CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

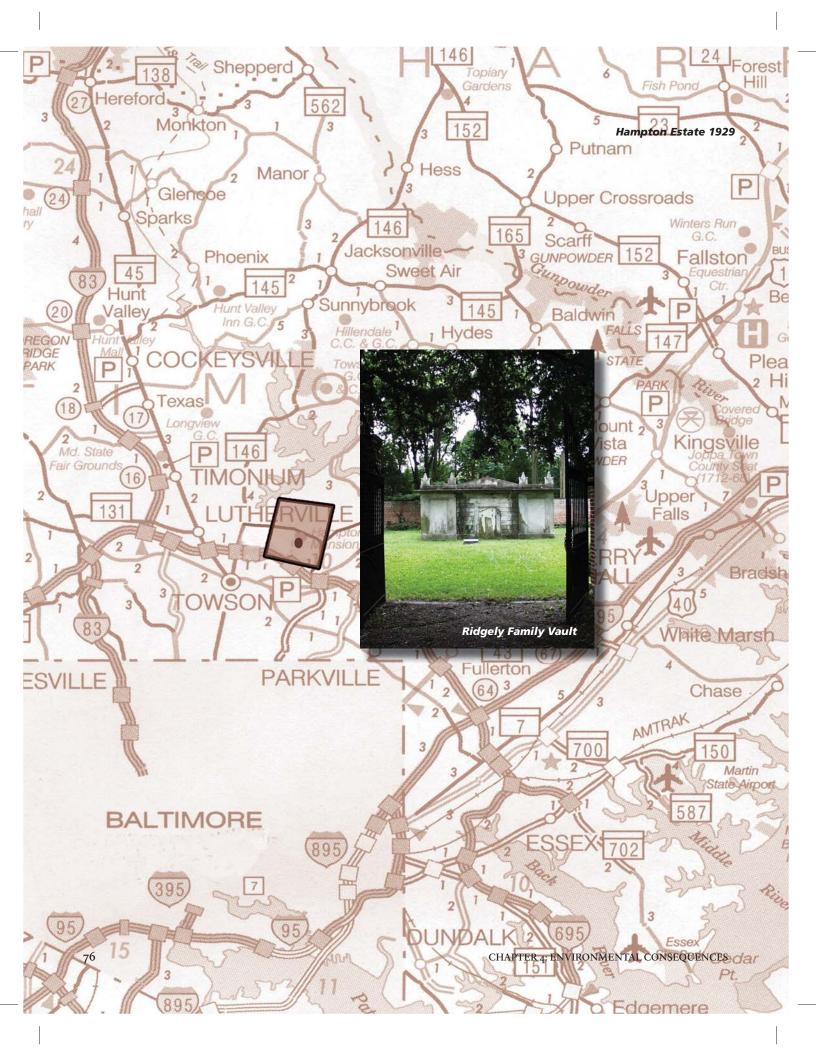
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INTRODUCTION

NEPA requires that environmental documents discuss the environmental impacts of a proposed federal action, feasible alternatives to that action, and any negative environmental impacts that cannot be avoided if a proposed action would be implemented. In this case, the proposed federal action would be the adoption of a GMP for Hampton NHS.

General management plans are programmatic, long-range documents and the actions described in the alternatives are often general in nature and not necessarily site specific. The general nature of the alternatives dictates that the analysis of impacts is also general. Consequently, the impacts of these actions are analyzed in qualitative rather than quantitative terms. Thus, although the National Park Service can make reasonable projections of likely impacts, the environmental impact statement (EIS) presents an overview of potential impacts relating to each alternative. This EIS will serve as a basis for the preparation of more in-depth NEPA documents to assess subsequent developments or management actions. The next chapter, Consultation and Coordination, includes a summary chart of potential activities requiring review under NEPA and Section 106 of the National Historic Preservation Act of 1966, for the preferred alternative.

This chapter analyzes the potential environmental impacts of implementing the three alternatives on various impact topics related to cultural and natural resources, visitor use and experience, park operations and management, and the socioeconomic environment and constitutes the EIS for the plan. The analysis is the basis for comparing the beneficial and negative impacts of implementing the alternatives. For the purposes of analysis, it is assumed that all of the specific actions proposed in the alternatives would occur during the period of the plan's implementation.

This EIS generally analyzes the several actions outlined in each alternative set forth in Chapter 2 of this plan. Following the approval of the GMP, additional compliance would be required prior to implementing any facility or landscape development actions included in the alternatives. Appropriate detailed environmental and cultural compliance documentation would be prepared in accordance with the *National Environmental Policy Act*

of 1969 and the National Historic Preservation Act of 1966, both as amended, meeting requirements to identify and analyze impacts to potentially affected resources.

This chapter begins with a description of the methods and assumptions for analyzing impacts, including potential cumulative impacts and impairment of park resources. Then, environmental consequences of each alternative are presented. All of the selected impact topics are assessed for each alternative. The existing conditions for all of the impact topics that are analyzed are identified in Chapter 3 of this GMP.

Alternative I—Continuation of Present Practices, serves as the benchmark against which the action alternatives (Alternatives 2 and 3) are measured. The two action alternatives are compared to Alternative 1 to identify the incremental changes that would occur as a result of changes in park facilities, uses, and management.

Methods And Assumptions For Analyzing Impacts

Overall, the NPS based its impact analysis and conclusions on a review of the existing literature and the professional judgement of subject matter experts within the NPS and other agencies, consultations with partners—especially Historic Hampton, Inc. and the Maryland State Historic Preservation Officer (SHPO—and staff insights and professional judgment.

Since a number of evaluations and assessments have been completed for Hampton National Historic Site in recent years, the GMP has correlated the findings and recommendations from these reports to describe the resources, generate the alternatives and evaluate the impacts. To the greatest extent possible, the alternatives are consistent with the recommendations identified in the *Archeological Overview and Assessment* (2000), *Archeological Survey*

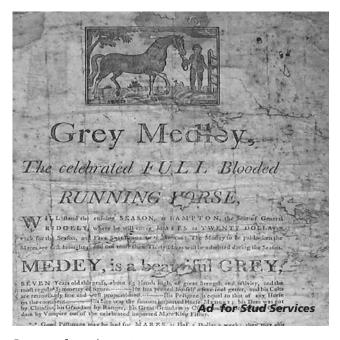
(2001), Business Plan (2006), Collections Management Review (1998), Collections Management Plan (1995) and 2009), Collections Storage Plan (1993), Cultural Landscape Inventory (2001), Cultural Landscape Report (2006) Long Range Interpretive Plan (2009), Natural Resource Report (1993), Park Asset Management Plan (2008), Park Asset Management Plan—Implementation Plan (2008), Pest Management Report (1992), Statement for Management (1989), Water Sampling Report (1999) and the recommendations from the Core Operations Workshop (2006).

As required by the NEPA, potential impacts are described in terms of type (positive or negative and direct or indirect), context (site-specific, local or regional), duration (short- or long-term) and level of intensity (negligible, minor, moderate or major). Cumulative impacts are also assessed. Where necessary and appropriate, this document suggests mitigating measures to minimize or avoid impacts. The following definitions are used throughout the impact analysis.

Impact type refers to the beneficial or positive change in the condition or appearance of a resource, or a change that moves the resource toward a desired condition. Negative change detracts from the condition or appearance of a resource, or moves the resource away from a desired condition. Direct impact occurs at the same time and/or place. Indirect impact is caused by an action later in time and/or place, but still reasonably foreseeable.

Impact context refers to the setting within which an impact may occur. In this document, cultural and natural resource impacts are limited to a specific site within the park (site specific) or impact the park as a whole (local). Socioeconomic impacts either affect businesses or individuals located mostly within or adjacent to the park (local) or affect businesses or individuals within Baltimore County and the larger community (regional).

Impact intensity refers to the degree or magnitude to which a resource would be beneficially or negatively impacted. Each impact is identified as *negligible*, *minor*, *moderate*, or *major*. Because the level of intensity varies by impact topic, intensity threshold definitions are provided separately for each impact topic. And once again, because this is a programmatic document, the intensities are expressed qualitatively not quantitatively.



Impact duration refers to how long an impact would last. The planning horizon for this general management plan/ environmental impact statement is approximately 20 years. Unless otherwise specified, in this document the following terms are used to describe the duration of the impacts: Short-term impact would be temporary in nature, lasting one year or less, such as impacts associated with construction. For the purposes of the socioeconomic analysis, short-term impacts would last less than three years. Long-term impact would last more than one year and could be permanent in nature, such as the loss of soil due to the construction of a new facility. Although an impact may only occur for a short duration at one time, if it occurs regularly over time the impact may be considered to be a long-term impact. For the purposes of the socioeconomic analysis, long-term impacts would last more than three years and may be permanent.

The NPS has consulted with numerous individuals, partners and public agencies in the development of the GMP/EIS and will continue to consult with the public, partners and agencies as it is implemented. As project-specific actions called for by the approved plan are implemented, further consultation with public agencies, additional analysis of impacts and more detailed environmental assessments may be prepared as appropriate. These documents would be tiered from this EIS.

CULTURAL RESOURCES

In this EIS, impacts on cultural resources are described in terms of type, context, duration, and intensity, which would be consistent with the regulations of the Council on Environmental Quality (CEQ) that implement the NEPA. However, this document is not being used to comply with Section 106, as this is a policy level document that does not detail actions to the degree of specificity necessary to make a determination of effect. Please note that the actions and topics are addressed only where there is potential impact. The selected cultural resources impact topics include historic structures, cultural landscape, collections, archeological resources and ethnographic resources.

Hampton National Historic Site will fully comply with 36 CFR 800, regulations of the Advisory Council on Historic Preservation for compliance with Section 106 of the National Historic Preservation Act in the future when projects are detailed to the level of specificity that a determination of effect could be identified. A list of potential actions that would likely require Section 106 consultation is provided in Chapter 5.

For purposes of analyzing potential impacts to cultural resources, the thresholds of change for the intensity of the impact are defined as follows:

Negligible impacts result from actions that impact a pattern or feature of an historic structure or cultural landscape at the lowest levels of detection, barely perceptible, and not measurable, with neither negative or positive consequences.

Minor impacts result from actions that impact a pattern or feature of an historic structure or cultural landscape, would be perceptible and measurable, but would be slight and localized. In terms of collections, the alteration would impact a few items in the collection. Negative impacts would not diminish the overall integrity of the structure or landscape and would not degrade the usefulness of the collection for future research and interpretation. In terms of archeological resources, disturbance of a site results in little, if any, loss of integrity or the disturbance results in maintenance and preservation of the site.

Moderate impacts result from actions that impact one or more character-defining patterns or feature(s) of an



historic structure or cultural landscape and would be perceptible and measurable. In terms of collections, the alteration would impact the condition and long-term preservation of many items in the collection. Negative impacts would not diminish the integrity of the structure or landscape to the extent that its National Register eligibility is jeopardized and would not diminish the usefulness of the collection for future research and interpretation. In terms of archeological resources, disturbance of a site does not result in loss of important information potential or diminish the integrity of the site to the extent that its National Register eligibility is jeopardized.

Major impacts result from actions that impact the majority of the character-defining pattern(s) or feature(s) of an historic structure or cultural landscape and would be substantial, discernible and long-term. In terms of collections, the alteration would impact the condition and long-term preservation of the collection as a whole. Negative impacts could diminish the integrity of the structure or landscape to the extent that it is no longer listed on the National Register and would destroy the usefulness of the collection for future research and interpretation. In terms of archeological resources, disturbance of a site is substantial and diminishes the integrity of the site to the extent that it is no longer listed on the National Register. Alternatively, the disturbance is an intervention to preserve a site.

NATURAL RESOURCES

Analysis of impacts to natural resources was based on research, knowledge of the area's resources, and the best professional judgment of planners, engineers and scientists who have experience with similar types of projects. Information on the area's natural resources was gathered from several sources, including the U.S. Fish and Wildlife Service, US Army Corps of Engineers, Natural Resources Conservation Service, Maryland Department of Natural Resources, Baltimore County Department of Environmental Protection and Resource Management, and the park's natural resource data base.

In this EIS, potential impacts on natural resources are described in terms of context, duration, and intensity and the definitions of impact intensity for selected impact topics including water quality and vegetation.

Socioeconomic Environment

The assessment of impacts to the transportation systems were limited to the area between Providence Road to the east, Dulaney Valley Road to the west, I-695 to the south and St. Francis Road to the north. Baltimore County land use maps were reviewed and consultation with the county zoning office was conducted to determine the local zoning designation of the adjacent land uses. Updated county demographic data were used where available; otherwise, demographic data were based on the 2000 Bureau of Census data to determine the demographic composition of the local area.

Existing and projected traffic volumes and levels of service for Hampton Lane, Providence Road and Dulaney Valley Road were obtained from the Baltimore County Transportation Planning office. Figures relating to traffic noise and air quality were obtained from the Maryland State Highway Administration's *Environmental Assessment/ Section 4(f) Evaluation and Finding of No Significant Impact for I-695*.

A number of site visits, discussions and evaluations were used to identify issues regarding parking and site ingress and egress with NPS staff from Hampton National Historic Site and the Northeast Regional Office and from the Federal Highway Administration. Factors that were considered in developing options in the alternatives included resource protection, safety and security, access for visitors and emergency vehicles, parking, community traffic interface, and the neighborhood context.

Professional expertise and judgment of staff from the NPS and the Maryland Office of Tourism Development, Baltimore County's Conference and Visitors Bureau, and Historic Towson, Inc. identified economic impacts to the broader community. Economic data, historic visitor use data, expected future visitor use, and future developments within the park and neighboring areas were used for a qualitative analysis comparing the impacts of alternatives.

Visitor Use and Experience

Analysis of visitor use and experience was based on research and the best professional judgment of NPS staff and consultants who have experience with similar types of projects. Information on park visitors is based on interviews with park and HHI staff, a traffic study, discussions with county and state tourism agencies, and published sources on the internet.

In this GMP/EIS, potential impacts on visitor use and experience are described in terms of context, duration, and intensity. The definitions of impact intensity for the selected impact topics are included at the beginning of each section.

Park Operations and Management

With the assistance of HHI and NPS staff from the Northeast Regional Office, Museum Services Center and Historic Architecture program, the park staff analyzed the impacts of existing and one-time funding, staffing organization, facility management and partnership development. The analysis utilized information from the NPS resource information data bases, NPS policies, reports and proposals, and discussions with preservation, interpretation and management partners.

Cumulative Impact Analysis

A cumulative impact, described in the Council on Environmental Quality's regulation 1508.7, are incremental impacts of the action when added to other current and reasonably foreseeable actions, regardless of what agency (federal or non federal) or person undertakes such other action. Cumulative impacts can result from individually actions taking place over time.

Cumulative impacts consider all changes to the environment, whether direct or indirect, whether from the proposed action or from other federal, non-federal or private actions. Although these impacts may be individually imperceptible, impacts accumulate over time from one

or more sources and can ultimately result in the degradation of important resources. When considering cumulative impacts it is important to consider the impacts of activities being planned or undertaken outside the park, and how those actions impact resources.

Cumulative impacts were determined by combining the impacts of the alternatives with the impacts of other past, present, and reasonably foreseeable future actions then assessing the relative contribution of the alternative to the overall cumulative impact. Cumulative impacts are considered for all alternatives, and are presented within each impact topic discussion. In defining the contribution of each alternative to cumulative impacts, the following terminology is used:

Imperceptible—The incremental effect contributed by the alternative to overall cumulative impacts is such a small increment that it is impossible or extremely difficult to discern.

Noticeable—The incremental effect contributed by the alternative, while evident and observable, is still relatively small in proportion to the overall cumulative impacts.

Appreciable—The incremental effect contributed by the alternative constitutes a large portion of the overall cumulative impact.

Findings on Impairment of Park Resources and Values As stated in NPS Management Policies 2006 section 1.4.7:

"Before approving a proposed action that could lead to an impairment of park resources and values, an NPS decision maker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values. If there would be an impairment, the action must not be approved."

As stated in the NPS Management Policies 2006 section I.4.5:

"The impairment that is prohibited...is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values..."



An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- 2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- 3) identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance."

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. A determination on impairment is made for each impact topic related to natural and cultural resources in the Conclusion section at the end of the Environmental Consequences chapter. Impairment determinations are not made for socioeconomic topics, or visitor use and experience (unless impacts are resource based) because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values and according to the Organic Act, cannot be impaired in the same way that an action can impair park resources and values.

CULTURAL LANDSCAPES

For purposes of analyzing potential impacts to cultural landscapes, the thresholds to change for the intensity of an impact are defined as follows:

Negligible impacts result in change to a pattern or feature of a cultural landscape at the lowest levels of detection, barely perceptible and not measurable, with neither negative nor positive consequences.

Minor beneficial impacts result in enhanced preservation of small areas of the cultural landscape.

Minor negative impacts result in change to a pattern or feature of a cultural landscape, would be perceptible and measurable, but would be slight and localized. Slight alternations to any of the characteristics that qualify the landscape for inclusion in the National Register may diminish the integrity of the landscape.

Moderately beneficial impacts noticeably enhance preservation and protection of the landscape as a cohesive entity.

Moderately negative impacts result in change to one or more character-defining pattern(s) or feature(s) of a cultural landscape and would be perceptible and measurable. It could change the characteristic(s) of the landscape that qualify it for inclusion on the National Register and diminishes the integrity of the landscape as a whole, but does not jeopardize the landscape's National Register eligibility.

Major beneficial impacts substantially enhance protection and preservation of the landscape.

Major negative impacts change the majority of the character-defining pattern(s) or feature(s) of a cultural landscape and would be substantial, discernible and long-term. It could diminish the integrity of the landscape to the extent that it is no longer listed on the National Register and would destroy the usefulness for future research and interpretation.

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

There would be no change to the large-scale topographic features. The historic patterns in the upper parterres of the formal garden would be rehabilitated. Less than two acres around the formal garden would be disturbed during construction and most of the impacts would disappear within a year as ornamental plantings increase in vigor, the lawns get reestablished and the construction debris is removed. These initial short-term, minor negative impacts would be overshadowed by the long-term, moderate beneficial impacts.

Rehabilitation of the dovecote/garage would have short-term minor negative impacts due to trenching for utilities and general construction. Regrading and replanting the lawns would erase these impacts within a year.

The new collections management facility would be larger than any other building west of the mansion and would be visually dominate the cultural landscape of the, historic service area. New sidewalks and road modifications would be required to service the front entrance and loading docks in the new building. Extensive grading and/or new retaining walls would be required to meet grades of the existing roads and parking lots and accommodate surface drainage requirements. The extent of the intrusion of this modern building and its visual domination of the historic service area is unknown until the grading and engineering plans are completed for the road, parking lots and new building; however with what is known now, construction of this new structure would have long-term, negative and moderate impacts.

Cumulative Impacts

Since the first Ridgely settled at Hampton, the family acquired, sold, or transferred property as their fortunes changed. At the height of its operation, the Hampton estate encompassed approximately 24,000 acres. When transferred into the national park system, the estate had shrunk to a little over 63 acres. All that remains of the formerly vast estate are two small parcels on opposite sides of a commuter route bounded by a six-lane interstate highway and suburban development. Over the past 200 years, the small villages and isolated farmsteads that once covered the surrounding landscape have given way to sprawling bedroom communities serving Baltimore

and Washington, D.C. The rapid growth in the greater Baltimore region and the construction of I-695 has contributed to the deterioration of the pastoral setting that the Hampton estate once enjoyed. The noise wall along the south side of the park has mitigated some of the noise from the interstate; however, traffic on I-695 can still be heard throughout the park.

Small villages and isolated farmsteads gave way to small-scale, small lot suburban developments in the early to mid-20th century. These developments of modest structures separated by woods are now being replaced by substantially larger buildings that have cut down wooded lots and developed open fields to accommodate larger, single-family homes and new community institutions with multiple buildings, roads and parking lots. Overall, this loss of the historic rural landscape has a long term, moderate and adverse impact on cultural landscapes in the region.

Alternative I preserves a small part of the rural landscape that once covered the surrounding hills and provides a visual respite from interconnected modern development, now and in perpetuity. Therefore, although the overall cumulative impact to cultural landscapes from the surrounding development plus Alternative I is adverse, the contribution of Alternative I to the total cumulative impact is imperceptible, and in some cases, provides benefits to cultural landscapes through the park's preservation efforts.

Conclusion

- Implementation of Alternative I would result in short-term, minor negative impacts on the cultural landscape due to construction and long-term, moderate negative impacts from intrusion of new modern buildings into the historic setting.
 Long-term beneficial impacts would result from the rehabilitation of an important historic feature of the cultural landscape and the improved health of the plants.
- The contribution of Alternative I to the total cumulative impact is imperceptible, and in some cases, provides benefits to cultural landscapes through the park's preservation efforts.
- Impacts from the actions contained in this alternative would not likely result in impairment of cultural landscape resources in the park.

ALTERNATIVE 2

Direct and Indirect Impacts

Similar to Alternative I, the topography would remain unaltered with negligible impacts. This alternative includes the most extensive rehabilitation of the formal garden and the west field and the reconstruction of two missing historic features: the corn crib and summer kitchen. These actions would result in short-term, negative impacts due to ground disturbance and materials storage from construction and long-term beneficial impacts from rehabilitation and reconstruction of critical elements in the cultural landscape.

This alternative would have a more extensive rehabilitation effort of the ornamental and native plantings along the property boundaries. This would result in a long-term, minor beneficial impact from increased vigor of the plants resulting in improved screening of neighboring properties.

Modification of the alignment and cross section of the existing farm lane, relocation of the mansion-side visitor entrance drive and construction of new parking lots, paths and service roads would result in less than five acres of new paving in total. As with other construction activities, there would be short-term, minor negative impacts and, in this case, long-term, moderate negative ones from increasing modern paving in highly visible locations near the mansion and the farm.

Construction of a new administration and visitor services building would have a long-term, moderate negative impact on the cultural landscape. The construction of a second potentially even larger modern building, in addition to the collections facility, would create an even greater visual intrusion into the cultural landscape of the historic service area and the mansion itself.

Rehabilitation of the west field after relocating the road and rehabilitation of the historic orchard would result in long-term, minor beneficial impacts. The view towards the mansion, across the lawn and framed by trees is the iconic image of the antebellum mansion. The orchard frames the view and restores an element that has been missing from the cultural landscape for almost a century.

Short-term, minor negative impacts to the cultural landscape would also results from the reconstruction the summer kitchen and the corn crib due to ground disturbance and materials storage during construction. Since the structures would be placed on areas already disturbed, the cultural landscape impact (less than an acre) would be negligible.

Cumulative Impacts

As described above, there is a long term, moderate and adverse impact to cultural landscapes from loss and alteration of landscapes and landscape features throughout the region.

Alternative 2 would rehabilitate all the existing cultural landscapes in the park, especially in places visible from Hampton lane like the orchard and the home farm. Therefore, although the overall cumulative impacts to cultural landscapes from the surrounding development plus Alternative 2 is adverse, the contribution of Alternative 2 to the total cumulative impact is imperceptible, and in most cases, provides a benefit to cultural landscapes through the park's preservation and rehabilitation efforts, which would help to offset some of the overall adverse cumulative impact. Of all the alternatives, Alternative 2 would provide the greatest benefit to preservation of cultural landscapes.

Conclusion

- Overall, implementation of Alternative 2 would have the greatest long-term negative impacts on the cultural landscape due to introduction of the second large, new, modern NPS building into the historic setting.
- The contribution of Alternative 2 to the total cumulative impact is imperceptible, and in most cases, provides a benefit to cultural landscapes through the park's preservation and rehabilitation efforts, which would help to offset some of the overall adverse cumulative impact.
- Impacts from the actions contained in this alternative would not likely result in impairment of cultural landscape resources in the park.

Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

Similar to Alternatives 2, the topography would remain unaltered and would have negligible impacts.

This alternative includes more rehabilitation of the formal garden than called for in Alternative 1, but less than identified in Alternative 2. The increase would not be substantial, so the negative impacts would be similar to that identified for Alternative 2: short-term, minor and negative due to construction. Long-term impacts would be moderate, less than Alternative 2, since the rehabilitation effort would be more limited in scale and scope.

As identified in Alternative 2, there would be long-term, minor beneficial impacts from the rehabilitation of ornamental and native plantings along the boundaries. This would result from improved vigor of the plants and therefore more screening of the neighboring properties.

Similar to Alternative 2, a small portion of the fields (less than one acre) along the farm lane and Hampton Lane would be graded and paved to provide adequate turning radii, safe road shoulders and new paths and crosswalks. This modification of the alignment and cross section of the existing farm lane and construction of a new path and crosswalk along Hampton Lane would have long-term, minor negative impacts to the cultural landscape due the increase of paving in this highly visible location.

The impacts relating to the relocation of the existing entrance road, from its current location in the middle of the west field to the edge of the park property and construction of new paths, parking lots and service drives connecting park operations and visitor service facilities with the historic buildings and gardens, would be less than identified for Alternative 2. The alignment of the new entrance drive and the configuration of parking lots would be different from those in Alternative 2, since there would be no new administration and visitor services building, rather, these operational features would be housed in existing buildings. There would still be shortterm, minor negative impacts from ground disturbance and materials storage during construction and long-term, minor to moderate negative impacts from the intrusion of the relocated parking lots, road and pathways into the cultural landscape. The extent of the impact could be



significantly lessened with sensitive site design, screening and materials selection.

The same short-term, minor negative impacts to the cultural landscape from ground disturbance and materials storage, as identified for Alternative 2, would occur during the reconstruction of the summer kitchen and the corn crib. Construction of a small contact station in the mansion side Support Zone and reconstruction of the corn crib would have additional construction-related short-term, minor negative impacts. There would also be long-term, moderate beneficial impacts as the corn crib would be returned to the cultural landscape and the visitor contact station on the mansion side would break up the view of the collection building—making it appear more like a cluster of out buildings.

Cumulative Impacts

As described above, there is a long term, moderate and adverse impact to cultural landscapes from loss and alteration of landscapes and landscape features throughout the region.

Alternative 3 would preserve major portions of the cultural landscapes in the park, more areas than under Alternative 1 but would not rehabilitate cultural land-

scapes as in Alternative 2. Therefore, although the overall cumulative impact to cultural landscapes from the surrounding development plus Alternative 3 is adverse, the contribution of Alternative 3 to the total cumulative impact is imperceptible, and in some cases, provides a benefit to cultural landscapes through the park's enhanced preservation efforts which would help to offset some of the overall adverse cumulative impact. Alternative 3 would provide more beneficial impact on cultural landscapes than identified in Alternative 1, but less than that identified in Alternative 2.

- Overall, implementation of Alternative 3 would have short-term, minor to moderate negative impacts due to construction and long-term, minor to moderate beneficial impacts from reconstructing the corn crib.
- The contribution of Alternative 3 to the total cumulative impact is imperceptible, and in some cases, provides a benefit to cultural landscapes through the park's enhanced preservation efforts which would help to offset some of the overall adverse cumulative impact.
- Impacts from the actions contained in this alternative would not likely result in impairment of cultural landscape resources in the park.

HISTORIC STRUCTURES

For purposes of analyzing potential impacts to historic structures, the thresholds to change for the intensity of an impact from an action (alteration) are defined as follows:

Negligible impacts result in change to a pattern or feature of a historic structure or group of structures at the lowest levels of detection—one that are barely perceptible and not measurable, with neither negative nor positive consequences.

Minor beneficial impacts result in preservation of a portion of a historic structure or group of structures.

Minor negative impacts result in change to a pattern or feature of a historic structure or group of structures, would be perceptible and measurable, but would be slight and localized. Slight alterations to any of the characteristics that qualify the landscape for inclusion in the National Register may diminish the integrity of the landscape.

Moderately beneficial impacts noticeably enhance preservation and protection of the landscape as a cohesive entity.

Moderately negative impacts result in change to one or more character-defining pattern(s) or feature(s) of a historic structure or group of structures and would be perceptible and measurable. It could change the characteristic(s) of the landscape that qualify it for inclusion on the National Register and diminishes the integrity of the landscape as a whole, but does not jeopardize the landscape's National Register eligibility.

Major beneficial impacts substantially enhance protection and preservation of the landscape.

Major negative impacts change the majority of the character-defining pattern(s) or feature(s) of a historic structure or group of structures and would be substantial, discernible and long-term. It could diminish the integrity of the landscape to the extent that it is no longer listed on the National Register and would destroy the usefulness for future research and interpretation.

The corn crib and summer kitchen proposed for reconstruction in Alternatives 2 and 3 are critical for interpretation of the work and workers—enslaved and free, that supported the estate. They would substantially add to the park's ability to tell the important stories of enslaved and



free workers and how their daily lives were lived at Hampton. Should further research provide for the reconstruction of the octagonal slave's quarters, that building would also serve critical interpretive purposes. Reconstruction is generally discouraged under applicable policies unless there would be substantial documentation for guidance and they would serve a critical interpretive purpose. Considerable historical evidence exists for two of these buildings and additional research is needed for the third. A plan would be developed and implemented to research and protect archeological resources at these sites. Full consultation with the SHPO and ACHP, as may be required, would be conducted regarding reconstructions proposed in Alternatives 2 and 3.

ALTERNATIVE I (No Action Alternative)

Direct and Indirect Impacts

Under Alternative I, historic structures would continue to be used for park operations. Some short-term, minor negative impacts would occur during the construction process from storage of equipment and materials. Additional long-term, moderate negative impacts would occur from structural changes to insure safety and accommodate modern uses, as well as, impacts from concentrating public use into portions of the mansion and the farmhouse without additional investment to mitigate this use.

The rehabilitation of the dovecote/garage into restrooms would have both short-term minor negative impacts due to storage of equipment and supplies and the construction process itself. However, there would be long-term, major beneficial impacts by rehabilitating the front facade and providing a handicapped accessible restroom for the farm side of the park.

The construction of the new collections management facility would have short-term minor negative impacts from construction related activities. The introduction of a modern, large building into the historic service area would have long-term, moderate negative impacts on the historic structures already there. The scale of the building is substantially larger than any other single building and the existing structures are tucked along the slope. This new building would be located further out into the west field, changing the spatial relationship of the historic service building group and the service build cluster in relation to the mansion. However, the new building has been designed to echo the historic building materials and design details from the structures at Hampton NHS in an attempt to blend in with the historic scene.

Cumulative Impacts

The greater Baltimore region has grown tremendously and the immediate Towson area has experienced rapid encroachment of residential and commercial development. Over the past 75 years, this rapid growth has resulted in the demolition and/or substantial alternation of many historic buildings in the region. In the community immediately surrounding the park, what was once agricultural fields has first changed to modestly scaled suburban development and, in recent years, is gradually being replaced with much larger single-family homes.



Overall, this loss of historic buildings and historic fabric has a long term, moderate and adverse impact on historic structures in the region.

Alternative I preserves the historic buildings in the park in their existing condition and would continue to do so in perpetuity. Therefore, although the overall cumulative impact to historic structures from surrounding development plus Alternative I is adverse, the contribution of Alternative I to the total cumulative impact is imperceptible, and in some cases, provides benefits to historic structures through the park's preservation efforts.

- Overall, Alternative I would result in short-term and long-term moderate negative impacts due to concentrated public use without additional mitigation investment and structural changes required to accommodate this use safely.
- The contribution of Alternative I to the total cumulative impact is imperceptible, and in some cases, provides benefits to historic structures through the park's preservation efforts.
- Impacts from the actions contained in this alternative would not likely result in impairment of historic structures in the park.

Alternative 2

Direct and Indirect Impacts

Under Alternative 2, modern uses, to the greatest extent possible, would be removed from historic structures and concentrated in a new operations facility and a few other structures, including the dovecote/garage and the farmhouse. Short-term, minor negative impacts would result from the process of rehabilitation for interpretation in those buildings identified for interpretation and longterm, moderate negative impacts would occur from structural changes required to insure safety and accommodate modern uses in the farmhouse and other buildings selected for park operations use. Long-term, moderate to major beneficial impacts would result from reducing the number of historic buildings used for park operations and visitor services and increasing the number used for interpretation. This alternative would rehabilitate the largest number of historic structures for interpretation and provide public access to the largest number of historic structures in the park.

Short-term, minor impacts to the Mansion would result from the reconstructing the summer kitchen. Short-term negligible impacts could occur in other historic structures selected to store materials and equipment during the reconstruction of the corn crib and octagonal slave quarters (should further research deem it feasible) and during the rehabilitation of the dovecote/garage. The reconstruction of the missing corn crib and summer kitchen and the potential reconstruction of the missing octagonal slave quarters would provide a long-term, minor beneficial impacts individually. However, the cumulative impact would have a more significant beneficial impact because these elements of the mansion reflect underrepresented or entirely missing aspects of the historic core of this plantation.

The construction of a new multi-purpose park operations building would have a long-term, moderate negative impact on the complex of the historic service buildings because it significantly increases the scale of a single structure, where smaller, more dispersed structures were historically constructed. It also reduces the visual dominance of the Mansion. This new operations and visitor services complex provides a long-term, minor beneficial impact by removing the temporary administration buildings from the middle of the west field and by integrating four separate modern buildings into a single

visual mass. This would provide efficient and adequate space meeting up-to-date health, safety and power requirements. The impact could be further reduced through sensitive site planning, architectural design and screening.

Cumulative Impacts

As described above, there is a long term, moderate and adverse impact to historic structures from loss of historic buildings and fabric occurring in the region.

Alternative 2 would rehabilitate all the existing historic buildings in the park and, if adequate information is available, would reconstruct some missing historic outbuildings around the home farm and the mansion. Therefore, although the overall cumulative impact to historic structures from surrounding development plus Alternative 2 is adverse, the contribution of Alternative 2 to the total cumulative impact is imperceptible, and in most cases, provides a benefit to historic structures through the park's preservation and reconstruction efforts. Of all the alternatives, Alternative 2 would provide the greatest benefit to preservation of historic structures which would help to offset some of the overall adverse cumulative impact.

- Overall, Alternative 2 would result in short-term negligible or minor negative impacts from the construction process and moderate beneficial impacts from rehabilitation of historic structures and moderate negative and beneficial impacts from construction of operational and visitor facilities that meet expands the impact of modern buildings into the historic setting, while meeting park needs and modern heath and safety codes.
- The contribution of Alternative 2 to the total cumulative impact is imperceptible, and in most cases, provides a benefit to historic structures through the park's preservation and reconstruction efforts.

Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

Under Alternative 3, operational and visitor services activities would be met by adapting historic structures and NPS buildings to modern park needs. Short-term, negligible impacts would result from storing equipment and materials during the rehabilitation effort. Long-term, minor to moderate negative impacts may result from the structural and safety modifications needed to support these modern needs in historic structures not originally constructed for these purposes. Moderate beneficial impacts to the long-term preservation of the structures would result from the investment of upgraded systems and infrastructure to these buildings, increased structural integrity and occupancy of the buildings. This alternative would adoptively reuse more historic structures for operations and visitor services and require less investment in new construction and on-going operational costs than identified for Alternative 2. This alternative would rehabilitate more historic structures and provide public access to the more historic structures than identified in Alternative 1, but fewer than Alternative 2.

Short-term, minor negative impacts to the Mansion and farm buildings would result from reconstruction of the summer kitchen and corn crib, and potentially the octagonal slave quarters (should further research determine that it would be feasible), due to storage of equipment and supplies and the construction process itself. However, the long-term impacts would be moderately beneficial as the reintroduction of these missing historic elements would restore the historic massing and spatial relationship of the groups of buildings associated with the Mansion and the farm.

The construction of a small visitor contact station on the mansion side in the Support Zone would have short-term, minor negative impacts because of storage of equipment and supplies and the construction process itself. The long term impact would be less than the large new head-quarters proposed in Alternative 2, but would still have long term, minor negative impacts, as it would be a small new structure. If designed sensitively, the visitor contact station might also help reduce the impact of the collections storage building by helping it appear like a cluster of smaller service structures. This would provide a long term beneficial impact.

Cumulative Impacts

As described above, there is a long term, moderate and adverse impact to historic structures from loss of historic buildings and fabric occurring in the region.

Alternative 3 would preserve all the existing historic buildings in the park and would rehabilitate several of them to house park operations and visitor services. Therefore, although the overall cumulative impact to historic structures from surrounding development plus Alternative 3 is adverse, the contribution of Alternative 3 to the total cumulative impact is imperceptible, and in some cases, provides a benefit to historic structures through the park's preservation and rehabilitation efforts which would help to offset some of the adverse cumulative impact. Alternative 3 would provide more beneficial impacts on historic structures than Alternative 1, but less than that identified in Alternative 2.

- Overall, implementation of Alternative 3 would balance long-term, minor to moderate negative impacts from construction activities with long-term, minor to moderate beneficial impacts on that provide buildings more able to meet park needs and modern heath and safety codes. This alternative would require the most compromises of historic structures to house administrative and operational needs in order to avoid development of a large new operations building.
- The contribution of Alternative 3 to the total cumulative impact is imperceptible, and in some cases, provides a benefit to historic structures through the park's preservation and rehabilitation efforts which would help to offset some of the adverse cumulative impact. The actions contained in this alternative would not likely result in impairment of historic structures in the park.

COLLECTIONS AND ARCHIVES

For purposes of analyzing potential impacts to collections and archives, the thresholds to change for the intensity of an impact from an action (alteration) are defined as follows:

Negligible impacts would impact the collections or its constituent components at the lowest levels of detection, barely perceptible and not measurable, with neither negative nor positive consequences.

Minor beneficial impacts would stabilize the current condition of the collection or its constituent components to minimize degradation.

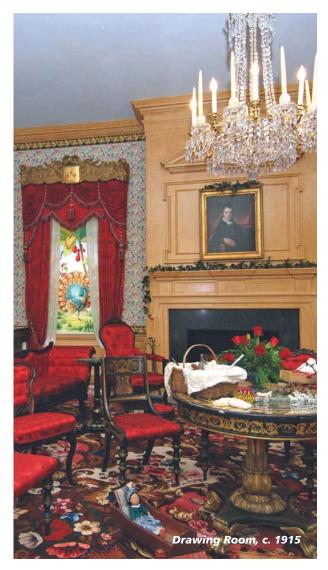
Minor negative impacts would be perceptible and measurable and would impact the integrity of a few items in the collection or its constituent components, but not degrade the usefulness of the collection or its constituent components for future research and interpretation. Slight alterations to any of the characteristics of the collection that qualify its related resources for inclusion in the National Register may diminish the integrity of the collection and its constituent components.

Moderate beneficial impacts would improve the condition of the collection and its constituent components from the threat of degradation.

Moderate negative impacts would be perceptible and measurable and would impact the integrity of most items in the collection and destroy its usefulness for future research and interpretation. It could change one or more of the characteristic(s) of the collection that qualifies it for inclusion on the National Register and diminishes the integrity of the resource and its related collection, but does not jeopardize the National Register eligibility of the resource related to the collection.

Major beneficial impacts would substantially secure the condition of the collection as a whole or its constituent components from the threat of degradation.

Major negative impacts would be substantial, discernible and permanent and would affect the integrity of most items in the collection and destroy its usefulness for future research and interpretation. It could severely change one or more of the characteristic(s) of the collection that qualify its related resource for inclusion on the



National Register and would diminish the integrity of the resource to the extent that it is no longer eligible for listing on the National Register.

Museum collections are important for their historic, scientific, artistic and interpretive value. For the purposes of this plan, impact analysis for the museum collection focuses on the storage and management of the collections, which include historic artifacts, archeological specimens removed from the ground, photographic and archival collections, and art and fine furnishings.

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

Under Alternative I, construction of a dedicated collections management facility, designed to meet all current museum storage, access, and research standards for collections and consolidate storage of the majority of Hampton collections from multiple park and off-site locations provides long-term, major beneficial impacts relating to resource preservation, security, and accountability. The artifacts and archives would be fully accessible on-site to staff and scholars for program development and independent research. This alternative most fully meets the goals of the *National Museum Storage Strategy* (2006) which specifically recommends consolidation of Hampton's museum storage facilities to as few locations as possible. It should be noted that the National and Northeast Museum's Collection Storage Plans initially recommended using the existing metal building and pole barn for storage on site, however, assessments of these structures since the completion of these plans by Northeast Museum Services, indicates replacing them with a purpose built facility, rather than retrofitting the existing structures, would be more cost effective and would provide better security and environmental control for the museum collections (Hampton Collections Management Plan 2009). There may be short-term, negligible impacts related to the moving and reorganizing of museum collections in order to achieve the desired consolidation in the new collections facility.

Cumulative Impacts

Cumulative impacts that relate to museum collections for this alternative would be noticeable because they would be stored in buildings with adequate environmental control and would provide adequate working space meeting up-to-date safety and health codes.

Conclusion

- Overall, implementation of Alternative I would have long-term, moderate beneficial impacts on museum collections. The benefits of this alternative are carried over into Alternatives 2 and 3 as a common action.
- Cumulative impacts for this alternative would be notifiable.
- Impacts from the actions contained in this alternative would not likely result in impairment of museum collections in the park.

Alternative 2

Direct and Indirect Impacts

In Alternative 2, many additional artifacts would be displayed in the increased number of historic furnished interior spaces and exhibits housed in restored historic structures. Since exhibits would rotate artifacts from storage to exhibition and back to storage, installation of necessary systems, regular monitoring of the environment, and the use of reproduction artifacts would be required. Improvements in the environmental conditions of the exhibits would have long-term, moderate beneficial impacts.

Cumulative Impacts

Cumulative impacts that relate to museum collections for this alternative would be imperceptible.

- Overall, implementation of Alternative 2 would have long-term, moderate beneficial impacts on museum collections in storage and for those on exhibit.
- Cumulative impacts for this alternative would be imperceptible.
- Impacts from the actions contained in this alternative would not likely result in impairment of historic structures in the park.



Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

In Alternative 3, many additional artifacts would be displayed in historic furnished interior spaces or interpretive exhibit spaces, but perhaps not quite as many as identified for Alternative 2. The long-term beneficial impact of improved controls and environmental control in exhibits described in Alternative 2 would still be required. These changes would have similar beneficial impacts to those described in Alternative 2.

Cumulative Impacts

Cumulative impacts that relate to museum collections for this alternative would be imperceptible.

Conclusion

- Overall, implementation of Alternative 3 would have the same long-term, moderate beneficial impacts on museum collections and for the collections on exhibit as identified in Alternative 2.
- Cumulative impacts for this alternative would be imperceptible.
- Impacts from the actions contained in this alternative would not likely result in impairment of historic structures in the park.



ARCHEOLOGY

For purposes of analyzing potential impacts to archeological resources, the thresholds to change for the intensity of an impact from an action (alteration) are defined as follows:

Negligible impacts would change the archeological resources at the lowest levels of detection, barely perceptible and not measurable, with neither negative nor positive consequences.

Minor beneficial impacts would preserve a small area or group of sites.

Minor negative impacts would be slight, but perceptible and measurable and would impact a limited area of a site or group of sites. Slight alterations to any of the characteristic(s) that qualify the site(s) for inclusion in the National Register may diminish the integrity of the site(s). Moderate beneficial impacts would noticeably enhance the preservation and protection of the site or group of site(s).

Moderate negative impacts would be perceptible and measurable and could change one or more of the characteristic(s) of the site(s) that qualifies it for inclusion on the National Register. It would diminish the integrity of the site(s), but does not jeopardize its National Register eligibility.

Major beneficial impacts would substantially enhance the preservation and protection of the site or group of site(s).

Major negative impacts would be substantial, discernible and permanent. It could severely change one or more of the characteristic(s) of the collection that qualify the site(s) for inclusion on the National Register and would diminish the integrity of the resource to the extent that it is no longer eligible for listing on the National Register.

Any change in archeological features would be irreparable and considered negative and of permanent duration; generally, the National Park Service promotes the policy of not disrupting archeological features as the best method of preservation. Negative impacts to archeological resources most often occur as a result of activities that cause ground disturbance, soil compaction, increased

erosion, or lead to unauthorized surface collection or vandalism. Beneficial impacts to archeological resources can occur when patterns of visitor use or management action are removed from the vicinity of archeological resources so they are avoided, thus helping to preserve them. In this way, incompatible activities that would otherwise continue to degrade areas of archeological sensitivity are reduced or stopped. Direct impacts can occur as a result of grading, trenching, or other activities that damage the configuration of an archeological site. Indirect impacts can occur as a result of increasing visitor activity or management action in the vicinity of an archeological site, leading to threats such as artifact collection, accelerated soil compaction, and erosion. The intensity of impact to an archeological resource would depend upon the extent of the effect on characteristics of the resource that qualify it for listing on the National Register.

A Phase I archeological survey for Hampton National Historic Site identified primary clusters of archeological resources and areas where archeological resources are not present. One of these other areas included the general area around the existing metal building and pole barn. This is the proposed site for the new operations/visitor services building and for the relocated entrance road. Many of the proposed ground disturbing actions identified in Alternatives 2 and 3 could be sited so as to avoid other primary clusters, thus obviating the need for (most) extensive testing and monitoring.

Before any major projects go into the design phase, further archeological analysis would be done to identify archeological resources and to develop strategies that would document, preserve and protect them as required in Section 110 of the *National Historic Preservation Act*.

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

Under Alternative I, the short-and long-term impacts to archaeological resources would be negligible for most of the park, since little ground disturbance would occur other than construction of the new collections management facility (see above). In addition, no actions are proposed that would change the current type, rate or pattern of deterioration to archeological resources,

mitigate impacts from current circulation and concentration of public use, or stabilize known archeological sites. The conversion of the dovecote/garage into public restrooms would require excavation to bring water to the building, resulting in a short-term, minor negative impact. Preliminary proposals recommend trenching in the existing road or in previously excavated areas to minimize damage to archeological resources. Regardless of the final proposal, the impacts would be monitored and documented as mitigation to potential damage and, when finished, the area would be returned to its previous appearance.

Rehabilitation of the formal garden would have negligible impacts from demolition of the existing planting beds, removing root balls and other ground disturbing activities. This garden has been dug up and the plantings completely replaced at least once or twice since the mid-19th century. As with the trenching for the dovecote/garage, the impact of this rehabilitation would be monitored and documented as mitigation.

Installation of interpretive panels throughout the park would have negligible impacts due to the extremely small area disturbed by each sign. Should research or subsequent ground disturbing activity identify archeological resources, all impacts could be avoided by use of stands that do not penetrate the ground at all.

Cumulative Impacts

The cumulative impacts that relate specifically to archeological resources would be imperceptible.

Conclusion

- Overall, implementation of Alternative I would result in negligible impacts to archeology.
- Cumulative impacts for this alternative would be imperceptible.
- Impacts from the actions contained in this alternative would not likely result in impairment of archeological resources in the park.

Alternative 2

Direct and Indirect Impacts

Under Alternative 2, short-term, minor negative impacts and negligible long-term impacts would result from construction activities associated with the reconstruc-

tion of the summer kitchen and the corn crib and the rehabilitation of the dovecote/garage into restrooms. Since these areas have been disturbed before, impacts to archeological resources would be limited to ground disturbance and compaction from equipment use, materials storage and construction. All ground disturbing activity would require archeological monitoring and documentation during construction.

Rehabilitation of the formal garden would have negligible impacts from demolition and rehabilitating parterres, paths and specimen plantings. The formal garden and associated planting areas have been dug up and the replaced during the NPS tenure and these proposed actions would not dig below the area already compromised. All ground disturbing activity would require archeological monitoring and documentation during rehabilitation.

Installation of interpretive panels throughout the park would have negligible impacts due to the extremely small area disturbed by each sign. Should future scholarship identify archeological resources at a location identified for a post, all impacts could be avoided by moving the post or using stands that do not penetrate the ground at all.

The construction of the new operations and visitor services headquarters and the Hampton Lane path and farm road projects would have short-term, minor negative impacts and moderate long-term impacts to archeological resources. While the project would be located in areas that have already been disturbed on the surface, the extent of the foundations, retaining walls and grading is extensive and the potential for digging into previously undisturbed soil is high. As with all other ground disturbing activity, all construction would be mitigated through testing, monitoring and documentation.

The relocation of the visitor entrance drive on the Mansion side would have short-term impacts similar to the other construction projects, The archeology survey has shown this general area to have a low likelihood for archeological resources. Consequently, impacts to archeological resources would be limited to ground disturbance and compaction from equipment use, materials storage and construction. As with all other ground disturbing activity, all construction would be mitigated through testing, monitoring and documentation.

Cumulative Impacts

The cumulative impacts that relate specifically to archeological resources would be imperceptible.

Conclusion

- Overall, implementation of Alternative 2 would have short-term, minor negative and long-term, moderate impacts to archeological resources. Of the three alternatives evaluated, this alternative would have more impact to these resources than Alternative 1 and Alternative 3.
- Cumulative impacts for this alternative would be imperceptible.
- Impacts from the actions contained in this alternative would not likely result in impairment of archeological resources in the park.

Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

Under Alternative 3, short-term, minor negative impacts and negligible long-term impacts would result from construction activities associated with the reconstruction of the summer kitchen and the corn crib. Since these areas have been disturbed before, impacts to archeological resources would be limited to ground disturbance and compaction from equipment use, materials storage and construction. All ground disturbing activity would require archeological monitoring and documentation during construction.

Rehabilitation of the formal garden and installation of interpretive panels throughout the park would have negligible impacts, similar to Alternative 2, from demolition and rehabilitating parterres, paths and specimen plantings. All ground disturbing activity would require archeological monitoring and documentation during rehabilitation.

The Hampton Lane path and farm road projects would have the same short-term, minor negative and negligible long-term impacts to archeological resources as identified in Alternative 2. The relocation of the visitor entrance drive on the Mansion side would have the same short and long-term impacts as identified in Alternative 2. As with all other ground disturbing activity, all construction would be mitigated through testing, monitoring and documentation. The construction of a small visitor contact station on the mansion side in the Support Zone would have short-

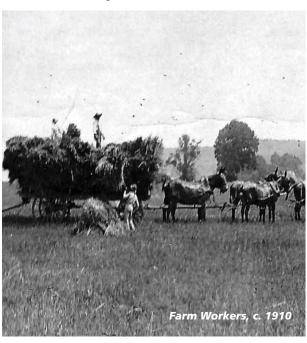
term, minor and long-term moderate negative impacts to archeological resources. Although a portion of this area has already been disturbed, the area identified for new construction has not been disturbed to the depth required for new foundations. Consequently, while the short-term impacts would be limited to ground disturbance and compaction from equipment use, materials storage and construction, the potential for impact from the new foundation is greater. As with all other ground disturbing activity, all construction would be mitigated through testing, monitoring and documentation.

Cumulative Impacts

The cumulative impacts that relate specifically to archeological resources would be imperceptible.

Conclusion

- Overall, implementation of Alternative 3 would have the same short-term negative impacts and a similar potential for long-term negative impact to Alternatives I and a smaller one than identified for Alternative 2.
- Cumulative impacts for this alternative would be imperceptible.
- Impacts from the actions contained in this alternative would not likely result in impairment of archeological resources in the park.



ETHNOGRAPHY

Certain important questions about human culture and history can only be answered by gathering information about the cultural content and context of cultural resources. Questions about contemporary peoples or groups, their identity and heritage have the potential to be addressed through ethnographic resources. As defined by the National Park Service, an ethnographic resource is a site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it.

Ethnographic resources are considered eligible for inclusion in the National Register of Historic Places as traditional cultural properties when 1) they are rooted in a community's history and are important for maintaining the continuing cultural identity of the community, and 2) they meet National Register criteria for significance and integrity. Often such communities are American Indian nations or groups, and in the case of Hampton, such groups of people appear to have traveled through the area while hunting or conducting other activities. An important community with special ties to Hampton National Historic Site would be that of African-Americans, particularly those descended from the enslaved people who once inhabited the estate.

Impacts to ethnographic resources occur as a result of changes in the physical characteristics of, access to, or use of resources, such that the cultural traditions associated with those resources are changed or lost.

Beneficial impacts can occur when intrusive facilities, or visitor or management activities, are removed from a traditional use area or when ecological conditions are improved at a gathering area such that the traditionally used resource would be enhanced.

Negative impacts occur when physical changes to a traditionally used resource or its setting degrade the resource itself, or degrade access to or use of a resource.

Short-term impacts represent a temporary change in important ethnographic resources such as vegetation used for traditional foods or temporarily restrict access to an important resource, and if they do not disrupt the cultural traditions associated with that resource for a noticeable period of time.

Long-term impacts involve a change in important vegetation or cultural features, or addition of a new facility or visitor use that would change the physical character of or access to a resource for a noticeable period of time. This period of time would vary by resource type and traditional practitioners. These long-term changes would disrupt cultural traditions associated with the affected resource, but the disruption would not alter traditional activities to the extent that the important cultural traditions associated with the resource are lost.

Permanent impacts involve irreversible changes in important resources such that the ongoing cultural traditions associated with those resources are lost.

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

Under this alternative, NPS would continue to preserve and interpret the extant stone slave quarters at the farm property—one telling the story of the experience of the enslaved at Hampton in the 1850s and the other interpreting post-emancipation stories and the tenant farmer experience. Additionally, archival research and documentation for the enslaved and post-Civil War African-American communities and other worker groups who contributed to Hampton would continue under all alternatives. There would be no short-term negative impacts and minor, long-term beneficial impact to ethnographic resources from this alternative would result from expanding the programs and efforts of the park to attract a wider audience and groups who have a traditional associations with the park.

Cumulative Impacts

The cumulative impacts that relate specifically to ethnographic resources would be imperceptible.

Conclusion

- Implementation of Alternative I would have no short-term and minor long-term, beneficial impact.
- Cumulative impacts for this alternative would be imperceptible.
- Impacts from the actions contained in any of the alternatives would not result in impairment of park ethnographic resources.

Alternative 2

Direct and Indirect Impacts

Under Alternative 2, NPS would continue to interpret the two extant slave quarters at the farm, and identified in Alternative 1. However, both structures would be more thoroughly fitted out with historically appropriate furnishings to create a more accurate and immersive historic experience inside the structures and in the immediate environs. Additionally, the octagonal slave quarters that once stood next to the Mansion (should further research demonstrate feasibility) and the summer kitchen that was actually attached to the Mansion, would be reconstructed to ensure the stories of the enslaved who lived and worked in the Mansion were fully told on that side of the property. Additionally, archival research and documentation for the enslaved and post-Civil War African-American communities and other worker groups who contributed to Hampton would continue under all alternatives.

There would be no long-term negative impacts to ethnographic resources, similar to Alternative 1; however, Alternative 2 would offer long-term, moderate beneficial impacts through the rehabilitation, reconstruction and augmentation of interpretation of the conditions of enslaved African-Americans living and working at Hampton.

Cumulative Impacts

The cumulative impacts in Alternative 2, that relate specifically to archeological resources, would be noticeable as there would be more attention paid to the lives and conditions of enslaved workers.

- There would be no negative impacts and implementation of Alternative 2 would have a greater long-term, beneficial impact to ethnographic resources than Alternative 1 but less than identified for Alternative 3.
- The cumulative impact of this alternative would be noticeable.
- Impacts from the actions contained in any of the alternatives would not result in impairment of park ethnographic resources.



Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

Under all alternatives, NPS would continue to interpret the two extant slave quarters at the farm, and identified in Alternative I. However, both structures would be more thoroughly fitted out with professional exhibits to evoke the historic scene and more fully engage the visitor with the complicated stories associated with slavery and race at Hampton. Additionally, the octagonal slave quarters that once stood next to the Mansion (should further research demonstrate feasibility) and the summer kitchen that was actually attached to the Mansion, would be reconstructed to ensure the stories of the enslaved who lived and worked in the Mansion were fully told on that side of the property. Archival research and documentation for the enslaved and post-Civil War African-American communities and other worker groups who contributed to Hampton would continue under all alternatives.

Under all three alternatives, there would be no long-term negative impacts to ethnographic resources. Alternative 3 offers long-term, moderate beneficial impacts through the rehabilitation, reconstruction and augmented interpretation of slave quarters. There would be a greater focus on interpretative programming and outreach in Alternative 3 that would expand the potential for attracting new audiences and traditionally associated groups more than identified in either Alternative 1 or 2.

Cumulative Impacts

The cumulative impacts that relate to ethnographic resources in Alternative 3 would be noticeable because the opportunity for interaction and the intent to attract a wider audience would be greater than identified in either Alternative 1 or 2.

- There would be no negative impacts and implementation of Alternative 3 would have a greater long-term, beneficial impact to ethnographic resources than Alternative 1 and Alternative 2.
- The cumulative impact of this alternative would be noticeable.
- Impacts from the actions contained in any of the alternatives would not result in impairment of park ethnographic resources.

WATER QUALITY

For purposes of analyzing potential impacts to water quality resources, the thresholds to change for the intensity of an impact from an action (alteration) are defined as follows:

Negligible impacts would not affect wetland function and water resource quality or the effects to the resource would be below or at the lower levels of detection. No negative or beneficial long-term effects to wetland function, riparian vegetation or water resource quality would occur and any detectable effects would be slight.

Minor impacts to wetlands or water resource quality would be detectable and relatively small, would likely be short-term, and the effects would be localized. The action would affect a few individuals of plant or wildlife species within an existing wetland or riparian area within the park. The change would require considerable scientific effort to measure and have barely perceptible consequences to wetland or riparian habitat function.

Moderate impacts would change an existing wetland area function or water quality, but the impact could be mitigated by the creation of artificial wetlands or the restoration of riparian habitat. The action would have a measurable effect on plant or wildlife species within an existing wetland or riparian area, but all species would remain indefinitely viable within the Hampton National Historic Site.

Major impacts would have drastic and permanent consequences for an existing riparian wetland function or water resource quality, which could not be mitigated. Wetland and riparian species dynamics would be upset, and species would be at risk of extirpation from Hampton National Historic Site.

Two types of impacts are analyzed: impacts as a reflection of increased impervious surface and storm water and impacts to the small stream system emanating from the spring inside the dairy. The stream runs 442 feet from the dairy eastward to a concrete enclosed culvert. Its banks include narrow bands of palustrine forested, broad-leafed deciduous riparian wetland areas (no greater than 10-12 feet at the eastern boundary). This stream is approximately 3 feet in width with an approximately 50 foot riparian buffer, and only minimal floodplain is

directly associated with it. The condition and function of stream riparian systems require consideration of hydrologic, vegetation, and erosion/deposition (soils) attributes and processes.

Potential impacts on water resources may include direct, indirect, temporary and permanent impacts. An example of a direct impact on water resources would be the alteration of a drainage pattern or streambed to accommodate road construction. An example of an indirect impact on water resources would be the increase in pollutants in a stream from spilled automotive fluids adjacent to a new road. Temporary impacts would occur during the implementation phase of the project, short-term impacts would be those that occur for up to one year, and long-term impacts would occur after full implementation and for the duration of the action.

Moderate to major hydrological impacts might arise from a project that imposes flood hazards on other properties, or decreases water available for aquifer recharge thus affecting well-water supplies. Major impacts on stream hydrology might result from uncontrolled runoff that causes erosion and subsequent sedimentation of downstream water bodies, especially if grading would occur during the rainy season or adjacent to bodies of water or drainage-ways. Modified drainage patterns might also create substantial changes to stream flow velocities. If a project incorporates extraction of water from an aquifer, a moderate to major effect might result if there would be a net deficit in aquifer volume or a reduction in the local groundwater table.

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

All maintenance activities that have potential for negative impacts on wetlands or streams would be conducted in accordance with Maryland's *Nontidal Wetlands Protection Act* (COMAR 26.23).

Construction of the collections facility would include extensive design to meet state and federal environmental regulations for water quality and additional runoff from new construction. The addition of an additional 5,000 square feet of building and approximately 10% increase in parking and roads would be offset by the removal of

the HHI trailer. The exact change in drainage pattern and new water management structures is not known because they have yet to be designed; however, the commitment is to no net change in water quality or runoff, although there is likely to be a long-term, moderate negative impact in the west field.

Consultation with the Corps of Engineers pursuant to Section 404 of the Clean Water Act may be required. Consultation with the Maryland Department of the Environment would be in accordance with the Maryland Coast Facilities Review (COMAR 26.22.01), the Chesapeake Bay Critical Area Protection Program (COMAR Title 27) and the Nontidal Wetlands Protection Act (COMAR 26.23). Consultation with Baltimore County Department of Environmental Protection and Resource Management would be recommended pursuant to the Chesapeake Bay Critical Area Protection Program and Article 9, Section 14-331, Protection of Water Quality, Streams, Wetlands and Floodplains for protection of these resources in Baltimore County.

Cumulative Impacts

Development of substantially larger homes next to the park that increases the impervious surface could change drainage patterns and water quality in the farm stream and in the drainage channels along the edge of the western field. Most of the impact would be downstream from the park and due to the topography of the park no surface flow would cross park lands; however, increased volume could cause periodic flooding within park property.

It is anticipated that even with the potential for drainage changes from the new NPS building, the contribution of Alternative 1 to the overall cumulative impact would be imperceptible.

Conclusion

- Overall, implementation of Alternative I would have long-term, moderate negative impact to water quality.
- The cumulative impact of this alternative to this overall cumulative impact would be imperceptible.
- Impacts from the actions contained in this alternative would not likely result in impairment of water quality in the park.

Alternative 2

Direct and Indirect Impacts

Under Alternative 2, the farm lane would be widened by 2 feet, half of the length realigned and all reinforced without change to the appearance of the existing surface. In addition, the entrance road on the mansion side would be relocated to the western edge of the property, new parking areas developed and the existing entrance drive and parking area. The new entrance road would likely be 30% longer than the existing one and the new parking area would be expected to accommodate 20% more vehicles than the current visitor, staff and overflow parking lots. There would also be an increased footprint for the operations and visitor service building. Subtracting the rehabilitated areas in the west field, less than two acres would be changed from field or lawn to impervious surface. Some of the potential increase in surface runoff could be mitigated through the use of pervious paving and retention structures.

Generally, short-term, minor negative impacts would be expected from road and parking area development and long-term, minor negative impacts would be expected due to the increase in impervious surface. Some of these negative impacts would be mitigated through the use of Best Management Practices (BMPs) during construction, by following state management policies for wetlands and by using drainage management techniques like pervious paving.

Consultation with the Corps of Engineers pursuant to Section 404 of the Clean Water Act may be required. Consultation with the Maryland Department of the Environment would be in accordance with the Maryland Coast Facilities Review (COMAR 26.22.01), the Chesapeake Bay Critical Area Protection Program (COMAR Title 27) and the Nontidal Wetlands Protection Act (COMAR 26.23). Consultation with Baltimore County Department of Environmental Protection and Resource Management would be recommended pursuant to the Chesapeake Bay Critical Area Protection Program and Article 9, Section 14-331, Protection of Water Quality, Streams, Wetlands and Floodplains for protection of these resources in Baltimore County.

Cumulative Impacts

As described above, there is a long term adverse impact to water quality from development in the region.

Alternative 2 would construct new impervious surfaces and drainage retention mechanisms so that no additional volume would drain into the existing streams and channels. Therefore, although the overall cumulative impact to water quality from surrounding development plus Alternative 2 is adverse, the contribution of Alternative 2 to the total cumulative impact is imperceptible.

Conclusion

- Overall, implementation of Alternative 2 would have short and long-minor negative impacts.
- The cumulative impact of this alternative would be imperceptible.
- Impacts from the actions contained in this alternative would not likely result in impairment of water quality in the park.

Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

Under Alternative 3, the farm lane, parking lots and entrance road would be altered similarly to that identified in Alternative 2. The footprint for the mansion side visitor contact station would be smaller with more opportunities for management of runoff than posed by Alternative 2, but would still have a long-term-ominor negative impact. Subtracting the rehabilitated areas in the west field, less than one and a half acres would be changed to impervious surface.

Generally, short-term, minor negative impacts would be expected from road and parking area development and long-term, minor negative impacts would be expected due to the increase in impervious surface. Some of these negative impacts would be mitigated through the use of BMPs during construction and by following state management policies for wetlands and by using drainage management techniques like pervious paving.

Consultation with the Corps of Engineers pursuant to Section 404 of the *Clean Water Act* may be required.

Consultation with the Maryland Department of the Environment would be in accordance with the Maryland Coast Facilities Review (COMAR 26.22.01), the Chesapeake Bay Critical Area Protection Program (COMAR Title 27) and the Nontidal Wetlands Protection Act (COMAR 26.23). Consultation with Baltimore County Department of Environmental Protection and Resource Management would be recommended pursuant to the Chesapeake Bay Critical Area Protection Program and Article 9, Section 14-331, Protection of Water Quality, Streams, Wetlands and Floodplains for protection of these resources in Baltimore County.

Cumulative Impacts

As described above, there is a long term adverse impact to water quality from development in the region.

Alternative 3 would construct new impervious surfaces and drainage retention mechanisms so that no additional volume would drain into the existing streams and channels. Therefore, although the overall cumulative impact to water quality from surrounding development plus Alternative 3 is adverse, the contribution of Alternative 3 to the total cumulative impact is imperceptible.

- Overall, implementation of Alternative 3 would have some short and long-term minor negative impacts, slightly less than Alternative 2 and more than identified for Alternative 1.
- The cumulative impact of this alternative would be imperceptible.
- Impacts from the actions contained in this alternative would not likely result in impairment of water quality in the park.

VEGETATION

For purposes of analyzing potential impacts to vegetation resources, the thresholds to change for the intensity of an impact from an action (alteration) are defined as follows:

Negligible impacts would not affect vegetation or the effects would be at or below the level of detection, would be short-term, and the changes would be so slight that they would not be of any measurable or perceptible consequence.

Minor impacts to vegetation would be detectable, although the effects would be localized, and would be small and of little consequence to anything outside the park. Mitigation measures, if needed to offset any negative effect, would be simple and successful.

Moderate impacts to vegetation would be readily detectable, long-term and localized, with consequences to vegetation in the park and immediate surroundings. Mitigation measures, if needed to offset any negative effect, would be extensive and likely successful.

Major impacts to vegetation would be readily detectable, long-term and localized, with consequences to vegetation in the park and immediate surroundings. Mitigation measures, if needed to offset any negative effect, would be extensive and likely successful.

The majority of the vegetative communities at Hampton National Historic Site are cultivated domestic landscapes, non-native, and deliberately and intensively managed as part of the cultural landscape. The uncultivated forested edges on the south and northeast borders are inundated with non-native and sometimes invasive plants. Hampton provides open space for recreation in this rapidly urbanizing, suburban community.

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

A small portion of the formal garden would be rehabilitated as outlined in the *Cultural Landscape Treatment Plan* and more detailed garden rehabilitation plans. This would increase plant vigor and remove hosts for disease, exotic species and invasive plants, resulting in long-term, minor beneficial impacts.

Construction activity would result in negligible short-term ground disturbance that would last for a year, ending once the lawns become reestablished and the construction materials removed. Substantial effort would be made to monitor and protect the historic vegetation. The increase in impervious surface relating to the new collections facility and its associated roads and paths would have a long-term, minor negative impact.

Cumulative Impacts

There would be an imperceptible cumulative impacts to vegetation under Alternative I.

Conclusion

- Alternative I would have both long-term, minor beneficial and negative impacts to vegetation.
- The contribution of Alternative I to this overall cumulative impact would be imperceptible.
- This alternative would not likely result in impairment to vegetation in the park.

Alternative 2

Direct and Indirect Impacts

Under Alternative 2 although there would be additional construction, the construction impacts would remain short-term and negligible because of their short duration and substantial effort would be made to monitor and protect the historic vegetation. The construction of the new administration and visitor services facility would have a long-term, minor negative impact from the loss of less than five acres of lawn to impervious surface.

The rehabilitation of the entire formal garden would restore the historic vegetation pattern, increase plant vigor and remove hosts for disease and invasives. This would have a long-term, moderate beneficial impact.

Rehabilitation of the native communities and ornamental plantings would have long-term, minor beneficial impacts by removing dead and diseased vegetation, enhancing interpretive views and providing more vigorous and dense screening between the park and adjacent landowners. Removal of invasive exotic plants on park property and outreach to neighbors would also have long-term, minor beneficial impacts by reducing sources of invasive species.



Cumulative Impacts

There would be an imperceptible cumulative impact to the vegetation from the actions of this alternative.

Conclusion

- Overall, implementation of Alternative 2 would have long-term, moderate beneficial impacts to vegetation in the park.
- Alternative 2 would have an imperceptible cumulative impact.
- Impacts from the actions contained in these alternatives would not likely result in impairment of the vegetation and the cultural landscape in the park.

Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

Under Alternative 3, there would be the same short-term, negligible impacts related to construction, as there were in Alternative 2. There would be the same level of effort expended to monitor the historic vegetation, to maintain their quality and to protect the park's cultural landscape during construction as identified in Alternative 2. There would also be negligible impacts from the loss of lawn

areas during the new construction of the orangery and the road projects.

Rehabilitation of the native communities and removal of invasive exotic plants would have the same long-term, minor beneficial impacts identified in Alternative 2. This alternative would rehabilitate less of the formal garden than identified in Alternative 2, but more than in Alternative 1. This change in management focus would still have long-term, minor beneficial impacts on the vegetation due to restoration of historic patterns, increase plant vigor and removal of disease hosts and invasives.

Cumulative Impacts

There would be an imperceptible cumulative impact to the vegetation from the actions of this alternative.

- Overall, implementation of Alternative 3 would have long-term, minor beneficial impacts to vegetation.
- Alternative 3 would have an imperceptible cumulative impact.
- Impacts from the actions contained in these alternatives would not likely result in impairment of the vegetation and the cultural landscape in the park.

ECONOMY AND LAND USE

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

Existing directional signs would be in character, appearance and placement the same as other directional signage along I-695, Hampton Lane and other regional roads. The main ones on I-695 would bring visitors directly to and from the site without passing the town center or any commercial area. Since there is no food at the park and the access routes from the main road are short, visitors would get on I-695 and leave the area to get food and drink. This would limit time at the site and same day return visits.

Hampton-oriented souvenirs, books and other items are supplied by the bookstore and are not found in local shops. Given the normal visitor travel patterns and the lack of marketing and product coordination between the park and local community, this would provide visitors with very little opportunity to see what the local community has to offer in terms of shops, restaurants or other amenities before or after their visit.

There are no private or public plans to significantly change the type or density of development adjacent to the park. Alternative I would have negligible impact on the existing or future use of land in the immediate vicinity.

Consequently the greatest contribution Hampton makes to the local economy would be through wage taxes and supplies. Given these factors, the actions under Alternative I would have a negligible impact on the regional economy or local land use.

Cumulative Impacts

There would be an imperceptible cumulative economic or land use impact in this alternative.

Conclusion

- Overall, the impact of Alternative I would be negligible.
- There would be an imperceptible cumulative economic or land use impacts for this alternative.

Alternative 2

Direct and Indirect Impacts

New directional signs would be in character, appearance and placement the same as other directional signage along I-695, Hampton Lane and other regional roads. The main ones on I-695 would reroute visitors past a small, but growing commercial area near the interstate. Plans to work with the town would provide information to visitors about food and drink available in the immediate area. This could expand time spent at the site, same day return visits and increase visitor spending in the town modestly.

These collaborations with the town, county and state agencies and business organizations could increase marketing and product coordination between the park and local community. This could increase the presence of Hampton-oriented souvenirs, books and other items in the bookstore and in local shops, thereby increasing visibility of the site in the community and the community to site visitors. This increased collaboration could give visitors a reason to go into the local commercial center and see what the local community has to offer in terms of shops, restaurants or other amenities.

There are no private or public plans to significantly change the type or density of development adjacent to the park. Increased collaboration with local and state agencies and business groups would include expanding outreach to local developers to maintain the character of the surrounding community.

In implementing Alternative 2, the park has the potential to draw an additional ten to fifteen percent more visitors to the park. However, the additional visitors would likely be primarily school groups with some additional tour groups, individuals and families. The school groups would take advantage of the expanded interpretation and would not likely be visiting stores and restaurants in the community. Consequently, even though there would be a substantial increase in visitation, the impact on the local economy would be negligible.

The increase in staffing and base funding in this alternative would increase the contribution Hampton makes to the local economy through wage taxes and supplies. Although there is an increased involvement with the community, the actions under Alternative 2 would have a long-term, minor beneficial impact on the regional economy or local land use.

Cumulative Impacts

The increase in attendance and improved information about food and shopping in the local community could impact local businesses. The increased conversations with builders and developers could increase the likelihood that compatible building would occur. These discussions and outreach efforts with local business interests and home builders would have an imperceptible cumulative economic or land use impact in this alternative.

Conclusion

- Overall, the impact of Alternative 2 would be long-term, minor and beneficial.
- There could be an imperceptible cumulative economic or land use impact in this alternative.

Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

New directional signs would be in character, appearance and placement the same as other directional signage along I-695, Hampton Lane and other regional roads. The main ones on I-695 would reroute visitors past a small, but growing commercial area near the interstate. Plans to work with the county would provide information to visitors about food and attractions available in the immediate area. Plans to explore options, impacts and funding for food and drink at Hampton National Historic Site are included in this alternative. Depending on the outcome of this study, this could either expand time spent at the site and severely limit the need for same day return visits and decrease visitor spending in the town modestly, or it could remain the same as described in Alternative 2.

These collaborations with the county and state agencies and business organizations could increase marketing and product coordination between the park and local community. This could increase the presence of Hampton-oriented souvenirs, books and other items in the bookstore and in local shops, thereby increasing visibility of the site in the community and the community to site visitors. This increased collaboration could give visitors a reason to go into the local commercial center and see what the local community has to offer in terms of shops, restaurants or other amenities.

There are no private or public plans to significantly change the type or density of development adjacent to the park. Increased collaboration with local and state agencies and business groups would include expanding outreach to local developers to maintain the character of the surrounding community.

In implementing Alternative 3, the park would also have the potential to draw an additional ten to fifteen percent more visitors to the park. However, the additional visitors would likely be primarily school groups with some additional tour groups, individuals and families. The school groups would take advantage of the expanded interpretation and would not likely be visiting stores and restaurants in the community. Consequently, even though there would be a substantial increase in visitation, the impact on the local economy would be negligible.

The increase in staffing and base funding in this alternative would increase the contribution Hampton makes to the local economy through wage taxes and supplies. Although there is an increased involvement with the community, the actions under Alternative 3 would have a long-term, minor beneficial impact on the regional economy or local land use.

Cumulative Impacts

Depending on the results of the study of food service at the park, the increase in attendance could reduce the numbers of visitors patronizing local businesses or it could be similar to that described in Alternative 2. The increased conversations with builders and developers would be similar to Alternative 2 and could increase the likelihood that compatible building would occur. Either way, these discussions and outreach efforts with local business interests and home builders would have a imperceptible cumulative economic or land use impacts in this alternative.

- Overall, the impact of Alternative 3 would be long-term, minor and beneficial.
- There would be an imperceptible cumulative economic or land use impacts for this alternative.

TRANSPORTATION

For purposes of analyzing potential impacts to transportation resources, the thresholds to change for the intensity of an impact from an action (alteration) are defined as follows:

Negligible impacts on transportation access and safety would not be affected, or the effects would be at low levels of detection and would not have an appreciable effect on the public health or safety.

Minor impacts would be detectable and would likely be short-term, but would not have an appreciable effect on transportation access and safety. If mitigation were needed, it would be relatively simple and would likely be successful.

Moderate impacts would be readily apparent and long-term, and would result in substantial, noticeable effects to transportation access and safety on a local scale. Mitigation measures would probably be necessary and would likely be successful.

Major impacts would be readily apparent and long-term, and would result in substantial, noticeable effects to transportation and safety on a regional scale. Extensive mitigation measures would be needed, and their success would not be guaranteed.

In 1962, construction on I-695 was completed, and between 1966 and 1971, the Beltway was widened to six lanes to accommodate the regional growth of the Baltimore area. In 1999, construction was again begun to widen the Beltway from six lanes to eight lanes. I-695 was one of the major infrastructure changes that have induced a transformation in the built environment around Hampton.

There are traffic safety and access impacts for Hampton National Historic Site and for the surrounding neighborhood under all alternatives. Hampton Lane bisects the site creating a barrier for easy and safe passage by visitors, particularly pedestrians. This barrier also impedes the interpretation of the farm site as there is limited access for buses and a safe pedestrian crossing is lacking. Safety is compromised since emergency vehicles and buses are oversized for the farm road. The turning radii, width, and bearing capacity are currently deemed insufficient to meet the basic safety requirements for such vehicles. The

existing driveways are in need of sight line improvements to increase safe exit from and entrance onto Hampton Lane from both sides of the site.

Short-term, minor negative impacts are those that might be encountered during construction and would include momentarily stopping traffic to allow safe entrance of an oversized vehicle, or temporarily closing a single lane while pipeline would be laid. Long-term moderate to major beneficial impacts would include permanent widening and reorientation of an entrance drive to allow safe exiting with good sight lines.

During consultations, the SHPO supported widening the farm road for safety considerations. Consultation with the SHPO also included discussion of the entry and egress to the mansion side. Under all of the alternatives an MOA should be signed with the SHPO to ensure that consultations are carried out during the design development and implementation phases of internal road and parking design.

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

Under Alternative 1, impacts affecting the transportation and circulation patterns would be long-term, minor to moderate and negative, because there would continue to be physical and safety barriers to crossing from the mansion side to the farm site, inhibiting the interpretive mission and permitting crossings between the sites. Emergency access and access for tour and school buses would be constrained. Currently, visitors walk along the park roads and cross Hampton Lane onto the farm lane and continue on towards the farm house. There are no signs or road markings to indicate the crosswalk. Large groups are escorted by their chaperones and at times, by NPS rangers. While these measures help, they are not adequate and the danger of accidents would continue to be very real for visitors crossing the road and walking along the park roads.

The existing alignment and cross section of the farm lane is inadequate for modern emergency vehicles and tour buses. In the dry weather when the ground is hard, these longer vehicles can navigate the turns; however, when the ground is soft, there is a danger of getting stuck.

Cumulative Impacts

The volume, speed and periodic congestion along Hampton Lane have increased due to the residential and commercial growth in Towson and the surrounding communities and from the construction of I-695. I-695 has transformed the area by providing access to the Baltimore and Washington, D.C. metropolitan areas. The Baltimore County Department of Public Works and the Maryland DOT are initiating a major road construction effort to improve local roads, access ramps to the interstate and widen I-695 by one lane adjacent to the park. While construction is not expected to extend beyond the existing noise wall or the state's right-of-way along Hampton Lane, these projects will increase the capacity of all these roads and therefore increase traffic volume and noise in the region. Overall, while these projects will relieve traffic congestion, the overall increase in traffic volume and noise has a long term, moderate and adverse impact on the region.

Alternative I maintains the existing programs and the existing visitation and circulation patterns and would not impact regional transportation levels or patterns. Therefore, although the overall cumulative level of the existing transportation patterns and levels plus that identified for Alternative I is adverse, Alternative I makes an imperceptible contribution to the total cumulative impact.

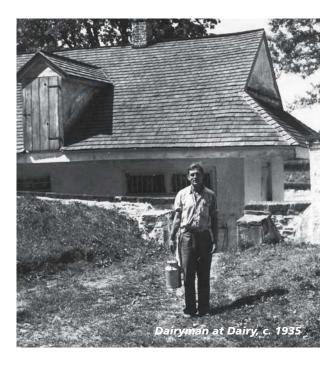
Conclusion

- Overall, implementation of Alternative I would result in long term, minor to moderate, negative impacts due to the safety issues going unaddressed.
- The cumulative transportation impacts for this alternative would be imperceptible.

Alternative 2

Direct and Indirect Impacts

Under Alternative 2, impacts affecting the transportation and circulation patterns would be long term, minor to moderate and beneficial, because the and safety barriers to crossing from the mansion side to the farm site, inhibiting the interpretive mission and permitting crossings between the sites would be addressed. Emergency access and access for tour and school buses would be corrected and pathways within the park would be separate from vehicle roads. In addition, there would be signs or road markings to indicate the crosswalk.



Under Alternative 2, the level of impacts from visitors travel from the major travel routes to the park would not change and would continue to be negligible. The majority of park visitors would enter from the Providence Road I-695 exit. Visitors would first use the farm road to enter the park and then all of them would use the relocated NPS entrance to get to the mansion. The relocated mansion-side entrance would move 100 feet closer to the western boundary. Given the location of I-695 (within ¼ mile) and the level of traffic on Hampton Lane—an increasingly busy and major county collector route, the change of access and circulation patterns within Hampton National Historic Site would be negligible. To minimize any impact on neighbors, buses and excessive numbers of cars would be parked near the mansion, where they currently park.

Park visitation is expected to increase by 10—15% over the life of this GMP. Even with the most optimistic visitation scenarios, the increase in total number of vehicles would be 700 vehicles per year or less than 5 additional vehicles per day. Under Alternative 2, there would be a substantial increase in foot traffic throughout the park, and especially between the farm and the mansion. This crossing of Hampton Lane would be considerably improved and safer. This new construction would increase

the number of visitors using the paths and would reduce pedestrian and vehicle incidents. Alternative 2 would provide the safest pedestrian crossing of all the alternatives. The increased emphasis on safety and new construction would reduce the negative impact to negligible and provide a minor, beneficial and long-term impact.

Cumulative Impacts

As identified in Alternative I, there is a long term, moderate and adverse impact from changing transportation levels and patterns in the area.

Alternative 2 would change the access route to the park and modify existing entrances to the home farm and the mansion. Although the changes in park programs would increase annual visitation to Hampton NHS, the total number of cars and buses from the park would remain less than 2% percentage of the hourly and daily loads on Hampton Lane and a barely measurable percentage on I-695. Therefore, although the overall cumulative level of the existing transportation patterns and levels plus that identified for Alternative 2 is adverse, Alternative 2 makes an imperceptible contribution to the total cumulative impact.

Conclusion

- Overall, the impact of Alternative 2 would be a long-term, minor beneficial impact.
- The cumulative transportation impacts for Alternative 2 would remain imperceptible.

Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

Under Alternative 3, impacts from visitors travel into and within the park would remain the same as described in Alternative 2. The majority of park visitors would enter from the Providence Road I-695 exit, as they would in Alternative 2. Visitors would first use the farm road to enter the park and then all of them would use the relocated NPS entrance to get to the mansion. The relocated mansion-side entrance would move 100 feet closer to the western boundary. Given the location of I-695 (within ¼ mile) and the level of traffic on Hampton Lane—an increasingly busy and major county collector route, the change of access and circulation patterns

within Hampton, National Historic Site would continue to be negligible. As in Alternative 2, buses and excessive numbers of cars would be parked near the mansion, where they currently park to minimize any impact on neighbors.

Park visitation is expected to increase by 10-15% over the life of this GMP. Even with the most optimistic visitation scenarios, the increase in total number of vehicles would be 700 vehicles per year or less than 5 additional vehicles per day. As described in Alternative 2, the impact for this alternative would remain negligible.

Under Alternative 3, there would be a substantial increase in foot traffic throughout the park, and e specially between the farm and the mansion. This crossing of Hampton Lane would be improved and safer. This new construction would increase the number of visitors using the paths and would reduce pedestrian and vehicle incidents. This alternative would provide a safer crossing than Alternative 1, and a slightly less safe one than Alternative 2. Under this alternative, the impact would remain minor and beneficial.

Cumulative Impacts

As identified in Alternatives 1 and 2, there is a long term, moderate and adverse impact from changing transportation levels and patterns in the area.

Alternative 3 would change the access route to the park and modify existing entrances to the home farm and the mansion in the same manner as described in Alternative 2. Although this alternative would have the greatest increase in annual visitation to Hampton NHS of all the alternatives, the total number of cars and buses from the park would still remain less than 5% percentage of the hourly and daily loads on Hampton Lane and a barely measurable percentage on I-695. Therefore, although the overall cumulative level of the existing transportation patterns and levels plus that identified for Alternative 3 is adverse, Alternative 3 makes an imperceptible contribution to the total cumulative impact.

- Overall, the impact of Alternative 3 would have minor beneficial impacts.
- The cumulative transportation impacts for Alternative 3 would remain imperceptible.

VISITOR EXPERIENCE

For purposes of analyzing potential impacts to visitor experience, the thresholds to change for the intensity of an impact from an action (alteration) are defined as follows:

Negligible impacts would not affect visitors, or changes in visitor use and/or experience would be below the level of detection. Any effects would be short-term. The visitor would not likely be aware of the effects associated with the alternative.

Minor impacts to visitor use and/or experience would be detectable, although the changes would be slight and likely short-term. The visitor would be aware of the effects associated with the alternative, but the effects would be slight. Visitor satisfaction would remain stable.

Moderate impacts to visitor use and/or experience would be readily apparent and likely long-term. The visitor would be aware of the effects associated with the alternative and would likely be able to express an opinion about the changes. Visitor satisfaction would begin to either decline or increase as a direct result of the effect.

Major impacts to visitor use and/or experience would be readily apparent and have important long-term consequences. The visitor would be aware of the effects associated with the alternative and would likely express a strong opinion about the change. Visitor satisfaction would markedly decline or increase.

The category of visitor experience includes what visitors do (visitor use), know, feel, and sense while in or around the site, interpretation (programs and media that communicate historical themes to public audiences), and education (programs and media that communicate these themes to organized groups, especially school groups). There would be considerable overlap among these three subsets, and they are analyzed together in the category of visitor experience. The alternatives presented are intended to improve the quality of the visitor experience and to increase opportunities to tell the full range of stories of the Hampton National Historic Site, rather than to generate greater raw numbers of visitors. Under all three alternatives, Americans with Disabilities Act (ADA) accessibility would be improved as funding became available.

There are two general sources for predicting the consequences to visitor experience of the various alternatives: experience and research. A vast reservoir of experience has accumulated for the more than 90 years of operations of national parks and the experiences of other parks, museums, and similar sites. These experiences are directly observed by planners who have worked in parks, and are shared formally in conferences and publications and informally through personal contacts. The accuracy of predictions based on experience would be substantially enhanced by formal research.

A short-term negative impact to visitor experience might involve closing a room to tours for a few days while an existing exhibit would be dismantled, cleaning and repairs take place, and a new exhibit would be installed. An example of a long-term negative impact to visitor experience would be a decision to limit access to a structurally vulnerable building to the public or even professional researchers in order to preserve the original flooring.

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

Under Alternative I, bus tours, school tours and other groups would continue to be oriented outdoors or in the farmhouse. Negative impacts to the visitor interpretation and experience would be moderate and long-term, as interpretation of the full range of stories, including those on the farm side and particularly relating to the stories of labor and slavery, would remain challenged by the lack of facilities and staff, limited access to the farm site, and the lack of adequate accessibility as required by the ADA. Services for groups would continue to be severely limited in inclement weather.

Cumulative Impacts

The Maryland Office of Tourism has launched a map and guide highlighting Underground Railroad stories in the state and has been promoting the Baltimore region as a destination for people interested in African-American history and the causes, conditions and lasting impacts of enslavement that form a part of our nation's history. Overall, these projects will increase visitation levels to historic sites and broaden their audiences that would have a long-term, moderate and beneficial impact on the region.



Alternative I would maintain the existing programs and visitor experiences that have limited focus on these broader interpretive stories. Therefore, this alternative would have imperceptible cumulative impact on visitor levels and experiences at historic sites in the region.

Conclusion

- Overall, implementation of Alternative I would provide the least benefit to visitor experience and interpretation of the three alternatives discussed in this document. This alternative would have long term, moderate negative impacts.
- In Alternative I, the park contribution to the overall cumulative impact would be imperceptible.

Alternative 2

Direct and Indirect Impacts

Under Alternative 2, impacts to the visitor experience would be long-term, moderate to major and beneficial, as considerable improvements to physical access, staff, and information would be facilitated. Visitor comfort would also be served as there would be accessible and adequate facilities for getting out of the inclement weather, and restrooms would be provided on both the mansion and farm sides. All visitors would begin their experience in

a single location— the visitor services area that would be part of the new administrative headquarters; visitors would be lead out into the property from that starting point—offering the most consistency of orientation among all visitors. This alternative also offers the most fully developed historic experience, as visitors would step back in time as they experience a restoration of the park's primary resources.

Negative impacts to interpretation would be short-term and minor during the rehabilitation process, but the long-term impact would be moderate and beneficial since interpretive programs would focus on the historic buildings, their settings and their historic uses and would often be self-guided and self-explanatory.

Additional items on exhibit or the representation of artifacts in historic context would be a long-term, minor to moderate beneficial impact.

Cumulative Impacts

As identified in Alternative 1, there is a long term, moderate and beneficial impact from changing visitor use levels and audiences in the area.

Alternative 2 would modify the interpretive themes and experiences available to visitors at both the home farm and the mansion to include stories of all the people who lived and worked at Hampton, enslaved, indentured and free. It is anticipated that these changes would increase annual visitation to Hampton NHS. Therefore, while Alternative 2 would echo the changing visitor use levels and patterns in the region, the activity at Hampton NHS would only make an imperceptible contribution to the total cumulative impact.

- Overall, implementation of Alternative 2 would provide an improved visitor experience and interpretation, above the levels described in Alternative 1 and equal, though distinctly different to that described in Alternative 3. Alternative 2 would have short term, negative impacts and a moderate beneficial impact.
- The park would contribute the greatest amount to the overall cumulative impacts, which are noticeable and negative, under Alternative 2 than under either Alternative I or Alternative 3.

Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

Under Alternative 3, beneficial impacts to the visitor experience would be moderate to major and long-term, as considerable improvements to physical access, staff, and information would be facilitated. Visitor comfort would also be served as there would be accessible and adequate facilities for getting out of the inclement weather, and restrooms would be provided on both the mansion and farm sides. Visitors would have maximum choice, planning their own visits from one of two visitor contact stations located at the corn crib on the farm side or small visitor contact station on the mansion side in the Support Zone, both imagined as staffed stations. This alternative would seek to create multiple opportunities for visitors to make meaningful connections between Hampton's stories and their own experiences, truly bridging the past and present.

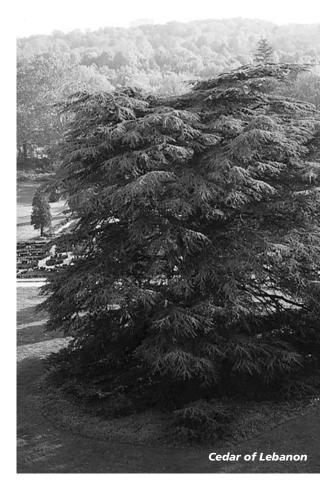
Negative impacts to interpretation would be short term and minor during the rehabilitation process, but the long-term impact would be moderate and beneficial since interpretive programs would utilize historic buildings for programming and interpretation.

Additional items on exhibit or the representation of artifacts in historic context would be a long term, minor beneficial impact.

Cumulative Impacts

As identified in Alternatives 1 and 2, there is a long-term, moderate and beneficial impact from changing visitor use levels and audiences in the area.

Alternative 3 would reconfigure the visitor experience at both the home farm and the mansion to include stories of all the people who lived and worked at Hampton—enslaved, indentured and free—as well as, the broader context of the family as a leader in the industrialization of the region and as a site where some of the most critical issues facing our nation during the 18th, 19th and 20th centuries were evident. The visitor experience would include a greater variety of interpretive media oriented to the needs and interests of a wider audience. It is anticipated that these changes to the interpretive programs and visitor experience would increase annual visitation to Hampton NHS would substantially widen the audience



coming to the park. Therefore, Alternative 3 would not only echo the changing visitor use levels and patterns in the region, but Hampton NHS would also make a noticeable contribution to the total cumulative impact by becoming a major destination for this new regional tourism initiative.

- Overall, implementation of Alternative 3 would provide an improved visitor experience and interpretation, above the levels described in Alternative 1 and equal, though distinctly different to that described in Alternative 2. Alternative 3 would have long term moderate beneficial impact.
- This alternative would make a noticeable contribution to the total cumulative impact by becoming a major destination for this new regional tourism initiative.

PARK OPERATIONS AND MAINTENANCE

For purposes of analyzing potential impacts to park operations and maintenance, the thresholds to change for the intensity of an impact from an action (alteration) are defined as follows:

Negligible impacts would not affect park operations or the effect would be at or below the lower levels of detection. No effects would occur to energy requirements and conservation potential or the effects would be below or at the level of detection and would not be long-term.

Minor impacts would be detectable, but would be of a magnitude that would not be appreciably negative or beneficial. The effects to energy requirements and conservation potential would be detectable and likely short-term. Any effects would be small and if mitigation were needed to offset potential negative effects, it would be simple and successful.

Moderate impacts would be readily apparent and would result in a substantial negative or beneficial change in park operations in a manner noticeable to staff and the public. The effects to energy requirements and conservation potential would be readily apparent and likely long-term. Any effects would result in changes to energy requirements and conservation potential on a local scale. If mitigation measures were needed to offset negative effects, they could be extensive but would likely be successful.

Major impacts would be readily apparent and would result in a substantial negative or beneficial change in park operations in a manner noticeable to staff and the public. The effects to energy requirements and conservation potential would be readily apparent and likely long-term. Any effects would result in changes to energy requirements and conservation potential on a local scale. If mitigation measures were needed to offset negative effects, they could be extensive but would likely be successful.

The impacts on administration and operations were determined by examining the effects of changes on administration and operational efficiency, facilities, and staffing and the role of partnerships in preservation and alternatives. Operational efficiency, for the purpose of

this analysis, refers to adequacy of the staffing levels and quality and effectiveness of the infrastructure used in the operation of the park in order to adequately protect and preserve vital park resources and provide for an effective visitor experience.

Alternative 1 (No Action Alternative)

Direct and Indirect Impacts

Under Alternative I, the administrative, maintenance and security functions would continue to operate under sub-optimal conditions and long-term negative impacts would be moderate. Administrative offices and the park partner offices would continue to occupy modular structures in the west field with all its major maintenance needs and limited connectivity issues. NPS staff would continue to be located throughout the park with limited phone and internet service. This alternative provides for the lowest staffing levels, the least service, and least investment in sustainable technologies. It also has the lowest operational cost.

Cumulative Impacts

The cumulative impacts that affect park operations and maintenance would be negligible.

Conclusion

- Overall, implementation of Alternative I would provide the least efficient model for park operations and the lowest level of park maintenance.
- The cumulative impacts with this alternative would be negligible.

Alternative 2

Direct and Indirect Impacts

Under Alternative 2, impacts to the administrative, maintenance and security infrastructure would be long-term, moderate to major, and beneficial as collections would be consolidated to several on-site facilities and under better climate control; research space would be provided; staff and partner offices would be in a single consolidated location; and staff would be able to respond to on-site needs in a more flexible and efficient manner. Because staff would be housed on-site, they would be able to more quickly respond to unexpected or emergency needs. The creation of a new operations and visitor services

building would increase operational costs; however, the new structure could be designed for optimum operational efficiency and energy savings to reduce this impact, and would eliminate energy inefficient modular structures now in use. Alternative 2 proposes the greatest staffing for the park and the greatest operational cost.

Cumulative Impacts

The cumulative impacts that affect park operations and maintenance would be negligible.

Conclusion

- Overall, implementation of Alternative 2 provides the
 most resources towards operation and maintenance of
 the park, the most service to the public, and the most
 intensive level of park maintenance at the greatest cost.
 Efficiency would be improved due to an investment
 in connectivity and infrastructure upgrades in
 technology. The impacts would be long-term, moderate
 to major and beneficial.
- The cumulative impacts with this alternative would be negligible.

Alternative 3 (Preferred Alternative)

Direct and Indirect Impacts

Under Alternative 3, beneficial impacts to the administrative, maintenance and security infrastructure would be moderate to major as collections storage would be consolidated under better climate control and protection. Staff offices would be distributed between a rehabilitated historic structure for administration and the collections management facility, however, staff would still be able to respond to on-site needs in a more flexible and efficient manner than in Alternative I. The need to maintain two small visitor contact stations—one on each side of the road—would have minimal to moderate operational costs and would require more interpretive staff. This alternative requires more staffing and operational expenses than Alternative 1, but less than Alternative 2. It would be also the medium choice for general efficiency of operation, but by providing substantial additional service, would be an improvement over Alternative 1.

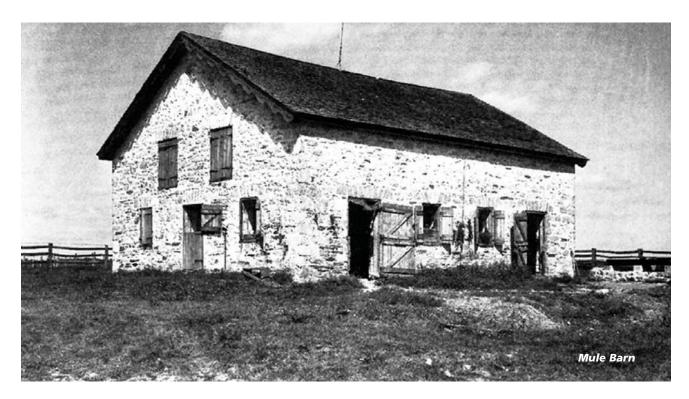
Cumulative Impacts

The cumulative impacts with this alternative that affect park operations and maintenance would be negligible.

Conclusion

- Overall, implementation of Alternative 3 provides increased resources towards operation and maintenance of the park and a better level of park maintenance than current operations. The cost would be believed to be justified due to these improvements without being the most expensive scenario. Efficiency would be improved due to an investment in connectivity and infrastructure upgrades in technology.
- The cumulative impacts with this alternative would be negligible.





UNAVOIDABLE NEGATIVE EFFECTS

There would be no unavoidable negative effects for Alternative 1.

The potential for unavoidable negative effects for Alternative 2 and 3 would include loss of historic integrity arising from rehabilitation efforts to solve existing safety and access problems into historic structures and along roads or during the process of stabilization or rehabilitation in historic structures or in the cultural landscape. Every effort would be made to avoid negative effects though use of Best Management Practices during the identification, construction and monitoring phases. In situations where an negative effect is identified through the design phase, consultation with the Maryland Historical Trust, State Archeologist, Advisory Council on Historic Preservation, Maryland Department of the Environment, and Baltimore County Department of Environmental Protection and Resource Management would be initiated by the park.

Careful consideration must be given to changing and removing elements that may have acquired historical

significance since 1867. Environmental assessment at the time of design and implementation of such plans would better quantify possible impacts and identify potential mitigation, and any unavoidable short-term impacts that would occur during construction. These impacts would likely occur in the form of fugitive dust, construction noise and construction equipment traffic on Hampton Lane.

RELATIONSHIP BETWEEN SHORT-TERM USES OF THE ENVIRONMENT AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

NPS is required, through the Organic Act (16 U.S.C. I), to "promote and regulate the use of the Federal areas known as national parks,...by such means and measures as \conform to the fundamental purpose of said parks,... which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and

by such means as would leave them unimpaired for the enjoyment of future generations." The short-term use of the resources must be balanced with the maintenance and productivity of the park's cultural, historic and natural resources.

If Alternative I—Continuation of Present Practices would be implemented, the public would not receive a long-term benefit from the interpretive and historic resources at Hampton National Historic Site and the full potential of the site would not be realized.

Under Alternative 2 and Alternative 3 (the Preferred Alternative), short and mid-term impacts to adjacent land uses at the farm property and along the western boundary of the mansion side of the park could occur until a vegetative buffer could be established or improved.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Potential irreversible and irretrievable commitments of the park's natural, historic and cultural resources include loss of unrecovered archeological resources and the integrity of the historic cultural landscape. Loss of historic elements from periods subsequent to 1867 due to rehabilitation or restoration activities would result in an irreversible loss to those resources. Under all alternatives, efforts would be made to insure resources are not lost.

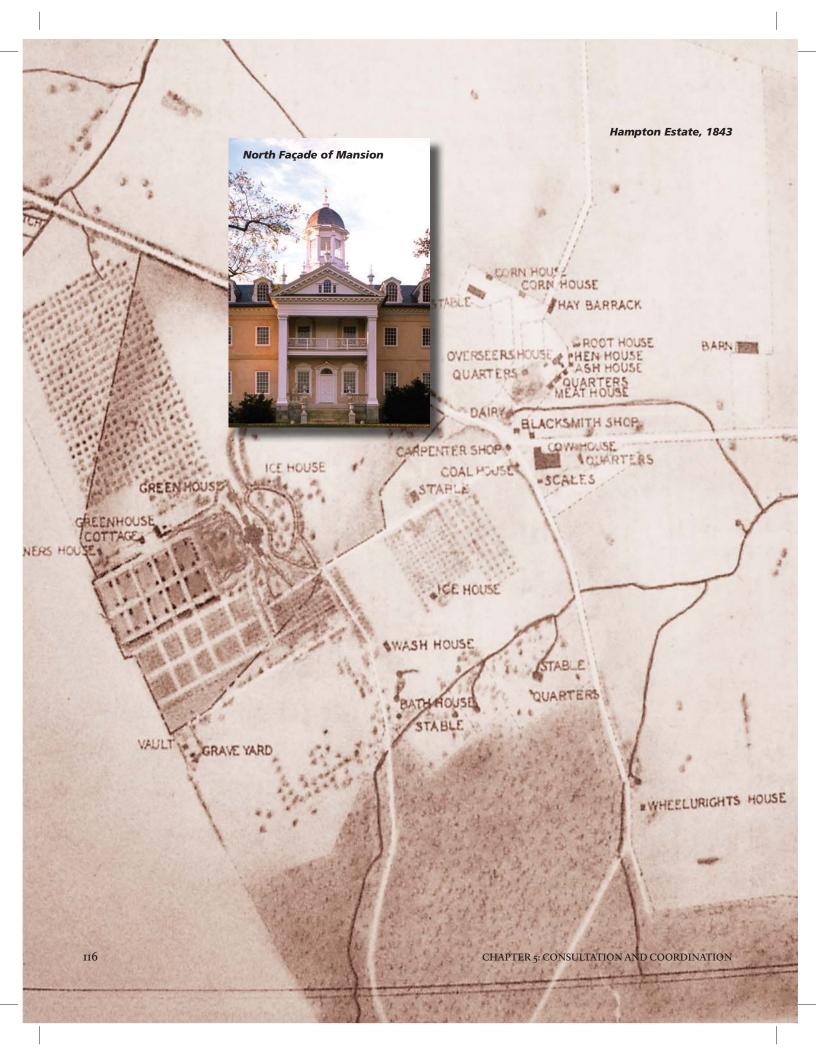
Mitigation measures that have been recommended include archeological surveys, testing and documentation of areas to be disturbed; consultation with the SHPO, the Advisory Council on Historic Preservation, Maryland's Department of the Environment and the Baltimore County Department of Environmental Protection and Resource Management; and development of a storm water management plan and implementation of erosion controls during the design and implementation phase and its concurrent environmental assessment.

CHAPTER 5

CONSULTATION AND COORDINATION

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PUBLIC SCOPING PROCESS

The development of a General Management Plan (GMP) for Hampton National Historic Site began with a public scoping process that continued throughout the planning process. The National Park Service (NPS) published a *Notice of Intent to Prepare a GMP/EIS* in the Federal Register, and asked citizens, organizations and agencies to identify any issues of concern, as well as ideas for the park's future. The NPS conducted public scoping meetings to solicit ideas on the public's vision for the future of the park. This was accomplished through public workshops and discussion groups; by reaching out to organizations that might have expertise or insight to offer; through newsletters, the media and the Internet; and through additional public meetings and briefings. Scoping and public involvement are one of the hallmarks of a general management planning process, that help define issues, shape the issues and keep the decision-making process open and accessible.

At the same time, the NPS collected and studied information about the park and its surroundings. Based on the results of scoping and research, concepts for the park were drafted, addressing future development, preservation, interpretation, visitor use and operations. The purpose of developing concepts is to synthesize the results of scoping and research and to clarify what are the most important decision points. The concepts were presented to the public in a workshop, by newsletter and on the park's web site. After public comments were received, the concepts were revised and again presented to the public in a workshop, a newsletter and on the park's web site.

Following additional public comment and NPS consideration, three alternatives were developed and described in the draft GMP/EIS. In addition to describing the alternatives, the draft document indicated which one was preferred by the NPS. Results of public and agency review of the draft GMP/EIS were considered by the NPS and this final document reflects these deliberations.

SUMMARY OF COMMUNITY PARTICIPATION

A *Notice of Intent* was published in the Federal Register in Volume 63, No. 159 on August 18, 1998. This notice initiated the scoping process for the Hampton National

Historic Site GMP/EIS. Public scoping, however, has been a continuous process which has informed the GMP/EIS throughout the planning process.

In June 1998, Newsletter #1 was published and placed on the web. It described the general management planning process, providing an overview of the park and describing how interested citizens and partners could become involved. The park's resources, significance and mission were introduced in subsequent public workshops that Fall. In small groups, participants identified and discussed goals for the park and issues for achieving the goal at a public workshop on September 16 and again on October 27 in 1998. Materials from the workshop and comments of the participants were transcribed and distributed to the participants through a letter and posted on the park's website In January and February 1999. Recipients of the newsletter and users of the web site were requested to send any comments they had on the workshops or summary materials to the park.

These workshops and public comments were used to develop four final planning concepts for the future of the park. These were presented at a public workshop on April 15, 1999, presented in *Newsletter #2* in May 1999 and posted on the park website in June 1999. In small groups at the April workshops, participants discussed each concept and wrote comments on the general proposal

and specific components of the alternative. As with the previous postings and mailings, recipients were requested to send their comments to the park for consideration and further development of the alternative proposals.

Due to the extensive comments received by the public and park staff, revisions were made and additional detail provided for the four concepts. This information was published in a *Newsletter #3* published in September 1999, and the information also was presented on the park's web site shortly after. A public workshop to discuss the revised concepts was held on September 16, 1999.

Over the next several years, extensive conversations were held with partners, the Maryland SHPO, neighbors and others to discuss their concerns. To reacquaint the public with the process and ideas of the alternatives, a follow-up open house was held on March 30, 2008 at Hampton National Historic Site.

These revised alternatives were further refined and were presented in the draft GMP/EIS in the fall of 2010. Following an extended period of public review with several open houses for the public and conversations with HHI and the Maryland SHPO, the comments from individuals, organizations and public agencies were reviewed by the NPS (see Appendix) and this final GMP/EIS prepared.

In response to concerns about the proposed rehabilitation projects in historic structures and proposals for new facilities on the site, a series of presentations and discussions have been held with the Maryland State Historic Preservation Office (SHPO) during the entire planning process. The Maryland SHPO has been frequently consulted during the entire planning process, but especially over the past two years, as specific rehabilitation projects have been developed for the mansion and the gardens. In addition, extensive conversations have been held regarding options for collections storage off site and at the park.

Following additional work by the planning team and review by the Washington and Northeast Regional Office of the NPS, a preferred alternative was selected and this Final GMP/EIS completed and published. This final document reflects and synthesizes the multitude of productive public discussions that have been held since the beginning of the project.

COMPLIANCE WITH LAWS, EXECUTIVE ORDERS AND REGULATIONS

Implementing a final GMP/EIS entails compliance with all applicable laws, policies, regulations and executive orders, as outlined in Chapter 4 of this GMP/EIS. Both formal and informal consultations with appropriate local, state and federal agencies have been conducted during this planning process.

Cultural Resources

The NPS is mandated to preserve and protect its cultural resources through the Organic Act of August 25, 1916, and through specific legislation such as the National Environmental Policy Act of 1969, and the National Historic Preservation Act of 1966. Cultural resources are managed in accordance with these acts and with Chapter 5 of NPS *Management Policies* (2006) and *Director's Order 28, Cultural Resources Management Guidelines*.

Section 106 of the *National Historic Preservation Act* requires that federal agencies that have direct or indirect jurisdiction take into account the effect of undertakings on National Register listed or eligible properties and allow the Advisory Council on Historic Preservation an opportunity to comment. The NPS would work with the Maryland State Historic Preservation Office and the Advisory Council to meet the requirements of *36 CFR* 800 and the recently signed 2008 Programmatic Agreement among the National Conference of State Historic Preservation Officers, the Advisory Council, and the NPS. This agreement requires the NPS to work closely with the Maryland SHPO and the Advisory Council in planning for new and existing NPS areas.

The agreement also provides for a number of activities that are eligible for the streamlined process, for specific actions that are not likely to have an adverse effect on cultural resources. The actions may be implemented without further review by the Maryland SHPO or the Advisory Council, provided that NPS internal review finds the actions to meet certain conditions. Undertakings, as defined in 36 CFR 800, not specifically excluded in the programmatic agreement must be reviewed by the Maryland SHPO, the Advisory Council, and others as appropriate before implementation. Throughout the process there would be early consultation on all potential actions relating to implementation of the GMP/EIS, as required.

The NPS will complete an assessment of effect on cultural resources before implementation of any of the proposed actions. This is necessary to document any project effects, outline actions proposed to mitigate any effects, and document that the proposed action flows from the GMP. All implementing actions for cultural resources would be reviewed and certified by cultural resource specialists consistent with NPS agreements and policies.

1998, a letter was sent to the Maryland State Historic Preservation Officer regarding development and implementation of the GMP. Since then, meetings with the SHPO, and park staff have been held regularly from 1999 to 2010. To date, no specific concerns have been raised concerning the identification and evaluation of historic resources related to the findings and recommendations contained in the final *General Management Plan*.

TABLE 5-1: Actions Requiring Consultation and/or Review		
Potential Actions	Compliance Requirements	
Rehabilitate cultural landscape	Review with SHPO and/or ACHP	
Rehabilitate formal garden	Review with SHPO and/or ACHP	
Construct interpretive orchard	Review with SHPO and/or ACHP	
Construct new multi-use building	Review with SHPO and/or ACHP	
Relocate or improve drives and rehabilitate landscape	Review with SHPO and/or ACHP	
New construction or reconstruct corn crib, octagonal slave quarters (if further research demonstrates feasibility), and summer kitchen	Review with SHPO and/or ACHP	
Rehabilitate historic buildings for interpretation or adaptive use for operations	Review with SHPO and/or ACHP	

Prior to any ground-disturbing action by NPS, a professional archeologist would determine the need for archeological activity or testing evaluation. Any such studies would be carried out in conjunction with construction and would meet the needs of the SHPO, Advisory Council and the NPS.

Section 110 of the *National Historic Preservation Act* requires the NPS to identify and nominate to the National Register of Historic Places all resources under its jurisdiction that appear to be eligible. Historic areas of the national park system are automatically listed on the National Register upon their establishment by law or executive order. Hampton's National Register documentation was updated during the course of the GMP planning process.

At key points in the planning process the Maryland SHPO has been consulted on this project. In March

However, they have raised a number concerns about the proposed rehabilitation of historic structures and cultural landscapes and the construction of new facilities. Consequently, there have been an extensive series of conversations over the past three years, especially in the last year about tissues associated with the collections facility, use of the mansion, rehabilitation of the formal garden and provision for curatorial storage. After reviewing the draft GMP/EIS, the SHPO reiterated their support for the preferred alternative and willingness to work with the NPS to implement the actions identified in the GMP (April 9, 2011). The final GMP/EIS will be distributed to the SHPO.

The table above identifies actions contained within the Final GMP/EIS that would likely require review under Section 106 of the National Historic Preservation Act and under the current *Programmatic Agreement* by the Maryland SHPO and/or the Advisory Council for Historic Preservation.

Natural Resources

Section 7 of the *Endangered Species Act* requires all federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) to ensure that any action authorized, funded or carried out by the agency does not jeopardize the continued existence of listed species or critical habitat. In October 1998, a letter was sent to the Maryland Heritage and Biodiversity Conservation Program and the US Fish and Wildlife Service to determine if any threatened or endangered species exist in or near the park. Follow-up letters were sent to the US Fish and Wildlife Service and the Maryland Department of Natural Resources, Wildlife Heritage Service in January 2003, October 2009 and January 2011.

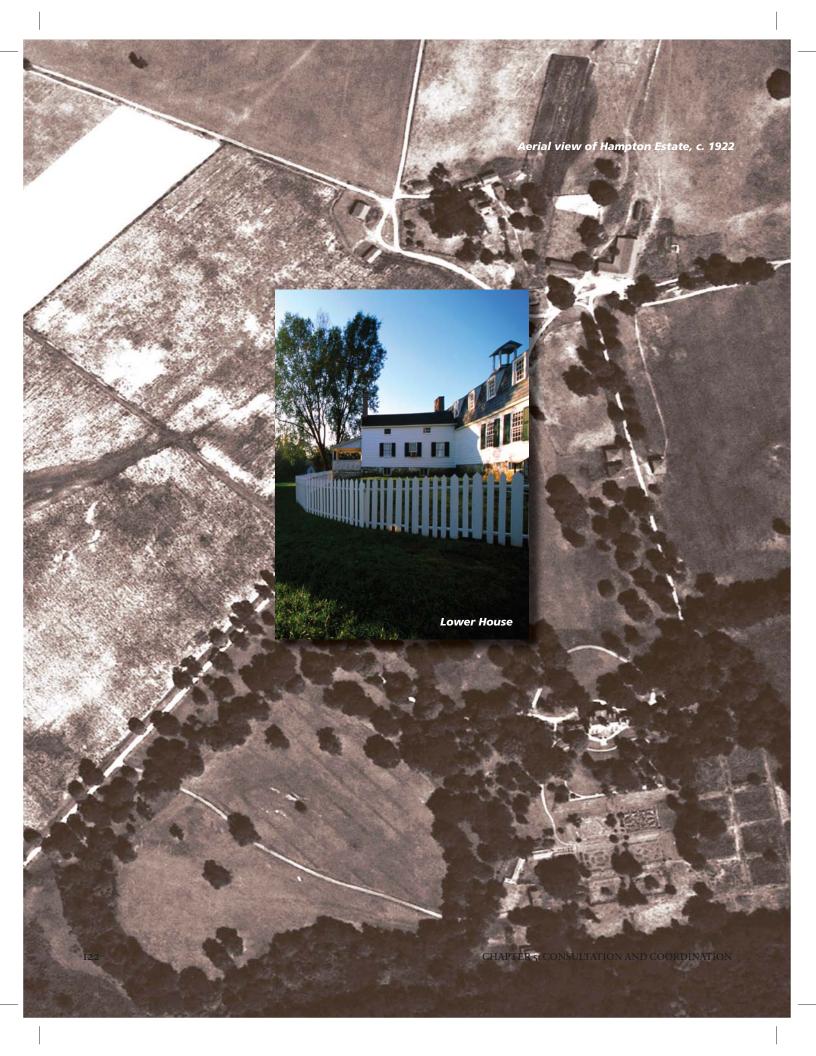
A response from the USFWS (November 23, 1998) noted that except for transient individuals, no federally proposed or listed endangered or threatened species are known to exist within the above referenced area. It also noted that additional consultation could be conducted through the Maryland Department of Natural Resources, Forest, Wildlife and Heritage Service, Wildlife and Heritage Division (MD DNR). A letter from that agency (May 7, 1999) noted that there are no records indicating the presence of Federal or State rare, threatened or endangered plants or animals within the park.

Due to the lengthy planning process, a second letter was sent to MD DNR and USFWS to verify these determinations in January 2003. No letter was received in response; however a telephone call was received from USFWS in early summer of 2003 verifying the original determination that there were no records indicating the presence of federal or state rare, threatened or endangered plants or animals within the park. Follow-up letters were sent in November 2009 and January 2011 to reverify that no federally listed species have been identified since the original inquiry and response. The NPS reviewed the USFWS and MD DNR websites listing species of concern for this area. Neither list included species know to be in the park and no new species were included in the listing since the original letters from either agency. A follow-up letter from MD DNR (April 5, 2011) verified that no change had occurred since the original determination. USFWS and MD DNR were sent the draft GMP/EIS and will also receive this final GMP/EIS.

At the beginning of the project, a series of meetings and telephone calls were held with the Baltimore County Planning Department to discuss transportation related issues. The ideas and concerns were incorporated into the original alternatives. Subsequently, a follow-up letter was sent in January 2003 to verify their support and identify any issues or concerns raised by the GMP. No response has been received. The Planning Department received the draft GMP/EIS and will also receive this final GMP/EIS.

APPENDIX





ORDER DESIGNATING THE HAMPTON NATIONAL HISTORIC SITE NEAR TOWSON, MARYLAND

June 22, 1948, 13 F.R. 3783

Whereas the Congress of the United States has declared it to be a national policy to preserve for public use historic sites, buildings, and objects of national significance for the benefit and inspiration of the people of the United States, and

Whereas historic "Hampton", near Towson, Maryland, built between 1783 and 1790 and one of the finest Georgian Mansions in America, has been acquired for the people of the United States through a generous private gift to the Nation, and

Whereas the Advisory Board on National Parks, Historic Sites, Buildings, and Monuments has declared that "Hampton" is of national historical significance as a splendid example of a great Georgian Mansion illustrating a major phase of the architectural history of the United States, and

Whereas title to the above mentioned building and appropriate grounds is vested in the United States:

Now, therefore, I, J.A. Krug, Secretary of the Interior, under and by virtue of the authority conferred upon the Secretary of the Interior by section 2 of the Act of Congress approved August 21, 1935 (49 Stat. 666; 16 U.S.C. 461-467), do hereby designate the following-described lands, with the structures thereon, to be a national historic site, have the name "Hampton National Historic Site;"

That certain parcel of land, together with the structures thereon, situated in the Ninth Election District of Baltimore County, State of Maryland, conveyed to the United States of America by John Ridgely, Jr., and Jean R. Ridgely, his wife, by deed dated January 23, 1948, and recorded in the Baltimore County Registry of Deeds on February 19, 1948, which according to a survey made by Dollenberg Brothers on December 29, 1947, is found to be within the following metes, bounds, courses, and distances, to wit:

Beginning at a stone heretofore set a the beginning of the fifth or south twenty-two and one-half degrees west sixteen feet line of a parcel of land containing one thousand acres allotted to John Ridgely of Hampton in certain petition proceedings in the Circuit Court for Baltimore County and recorded in Judicial Liber W.P.C. No. 209 folio 235 in the case of John Ridgely of Hampton vs. Otho E. Ridgely, et al.; and running thence with and binding on the outline of said parcel of land as the bearings are now referred to true meridian as established on "Plat No. 1 of Hampton" the eight following courses and distance viz: south thirteen degrees thirty-five minutes west sixteen feet to a stone, south seventy-seven degrees thirty-one minutes east one hundred ninety-nine and sixty-five one-hundredths fee, south nineteen degrees thirty-seven minutes west ten feet to a stone, south seventy-five degrees twelve minutes east twenty feet to a stone, north eighteen degrees two minutes east ten and eighteen one-hundredths feet to a stone, south seventy-seven degrees four minutes each one hundred forty-seven and ninety-five one-hundredths feet to a stone, north seventeen degrees fifty-five minutes east forty-two and fifty one-hundredths feet to a stone and south eighty degrees fifteen minutes east three hundred eighty-five and sixty one-hundredths feet to a pipe; thence leaving said outlines and running for lines of division the six following course and distances viz: north nine degrees eighteen minutes east, running parallel with and distant five feet westerly from the west wall of the Burial Ground there situate, one hundred eighty-four feet to a pipe, north one degree forty-seven minutes west six hundred seventy-four and fifty one-hundredths feet to a pipe, north twenty degrees eleven minutes west one hundred forty-one and two one-hundredths feet to a pipe, north eleven degrees forty-nine minutes east, binding in the center of a fifty foot road now laid out with the right and use thereof in common with others entitled thereto, four hundred feet, north seventy-one degrees fifty-six minutes west one hundred seventy-six and forty five onehundredths feet to a pipe and north four degrees twenty-seven minutes east three hundred ninety-three and twenty-five one-hundredths feet to a pipe set on the southeast side of Hampton Lane, fifty feet wide, thence binding on the southeast side of said Lane the two following courses and distances viz: south sixty-nine degrees sixteen minutes west eight hundred fourteen and fifty-five one-hundredths feet and south sixty-one degrees fourteen minutes west seven hundred ninety feet to a pipe, thence leaving said Lane and running for a line of division south thirty-two degrees east eleven hundred eighty-three and five one-hundredths feet to a pipe set in the fourth or south seventy-four degrees east one hundred nine and four-tenths perches line of the above referred to one thousand acres of land allotted to John Ridgely of Hampton; and thence running with and binding on a part said line, south seventy-nine degrees eighteen minutes east one hundred seventy-eight and seventeen one-hundredths feet to the place of beginning. Containing 43,295 acres of land more or less.

The administration, protection, and development of this national historic site shall be exercised by the National Park Service in accordance with the provisions of the act of August 21, 1935, supra.

Warning is expressly given to all unauthorized persons not to appropriate, injure, destroy, deface or remove any feature of this historic cite.

IN WITNESS WHEREOF, I have hereunto set my hand and caused the official seal of the Department of the Interior to be affixed, in the City of Washington, this 22nd day of June, 1948.

/s/ J. A. Krug Secretary of the Interior

RELATING TO ADDITION OF THE FARM COMPLEX TO HAMPTON NATIONAL HISTORIC SITE

October 12, 1978, Congressional Record, Pages 36221-36222

Mr. MATHIAS. Mr. President, the amendment I am offering today, along with Senators Sarbanes, Humphrey, and Case would expand the boundaries of the national historic site of one of the largest and finest Georgian homes in America. The Hampton NHS would be enlarged by approximately 14 acres to include the original farmhouse and six outbuildings.

Currently, this historic site consists of Hampton Mansion and several outbuildings located on a 45-acre tract just north of the Baltimore Beltway in Towson, MD. North of the mansion grounds is Hampton Lane, where the 14-acre farm parcel is located. This land area, virtually unseen from view by the dense vegetation is set back, somewhat, from Hampton Lane. In fact, the average visitor is probably not even aware of the existence of the farm, let alone capable of associating it with the mansion. Most would not even understand its true significance, which, I think, needs some explaining.

The significance of the farm is, simply, that Hampton originally was not just the mansion and its immediate grounds; rather, it was a sprawling plantation ...large venture, encompassing both agriculture and industry and the farm is an integral part of the enterprise.

It is important to note that many of the outbuildings on the Hampton Farm share common features with the [word illegible] buildings of the mansion. Several of the structures exhibit the same cornice and crescent-shaped cutouts, and the slate work of the masonry buildings is of similar appearance. This apparent relationship is important when relating the history of the Hampton estate as a single entity. In addition, it seems likely the nails, spikes, hinges, and other remaining hardware still visible in the buildings on both tracts of land were fabricated at the former carpenter/blacksmith shop from iron produced at Northampton furnace and should be noted as an example of how self-sufficient Hampton was.

Henry and Ottalie Williams in their book, "Great Houses of America" describe Hampton as "one of America's most imposing late—18 century mansions." So it is—and more.

Built by Charles Ridgely between 1783 and 1790, it stands today as one of the largest and finest Georgian houses in America. The mansion is furnished in the 1790-1830 period and contains many original Ridgely family pieces. The formal gardens, composed of six rectangular parterres in three terraces, are renowned for their sheer beauty.

Since 1948 Hampton has been the property of the American people as a national historic site. It is administered by the Society for the Preservation of Maryland Antiquities for the National Park Service. This arrangement has been eminently successful. Over the years it has provided the citizens of the Nation with a truly magnificent view of a late 18th century manor house.

And now—an exciting new development has taken place. The Hampton Farm is being offered for sale. We now have the opportunity to rejoin these two properties in one contiguous and grand Hampton National Historic Site. The acquisition of the Hampton Farm and its rehabilitation would have a dynamic effect upon the mansion as it is currently interpreted. The operation of a revitalized farm complex would dramatically help to transform Hampton from a site of primarily genealogical and architectural interest to what it really was—the centerpiece of a once vast estate, of which the farm was a major component.

The farm house, built in 1690, was originally known as Huntsman's Lodge and served as the home of Charles Ridgely while he built the mansion. The farm house has never been out of Ridgely hands.

I would like to describe for my colleagues the outbuildings which would be acquired pursuant to this amendment.

The overseer's house was the main building of the farm complex. It was built in stages, and its earliest section is believed to date from the early 18th century, or perhaps even the 1690s. The house is wood, with a stone foundation and wood shingle roof. The most recent addition dates from the 1940s, when the Ridgely family moved their place of residence from the mansion.

The shed/garage is situated very near to the overseer's house, and is a small wooden structure. As explained by Mr. John Ridgely III, the garage was built in two sections with the newer portion constructed from scrap lumber during his youth.

There are three slave quarters located on the property. All of them are two stories high, built on stone foundations with wood shingle roofs and brick chimneys. Two of the buildings have wooden cornices with crescent designs. Slave quarters III has an improved interior with a bathroom and was also used as a tenant house.

The bake oven is structurally sound stone located between slave quarters I and II, and has excellent interpretive potential.

The stuccoed stone dairy, believed to have been built before 1843, is partially below ground and includes a stream. There is an outdoor fireplace on the site and a brick chimney.

The rectangular-shaped two-story long barn/granary was built after 1843.

I24 APPENDIX

The corncrib is built on a stone foundation and has horizontal ventilated siding. One interesting feature of the structure is the doorway. The door itself has long iron hinges running almost the width of the door. It is believed that those hinges are the original ones and were produced at the Northampton furnace and the farm blacksmith shop. Above the main door is a transom door. Carved vertically at the door frames are Roman numerals (either VIII or VIIII). It should be noted that this feature was common in country buildings, and represented the builder's instruction mark. Such numbers provided guidance as to the proper construction of the structure's timber and beams. They were usually found in the attic. Such a feature, a mark of rural artisanship, must be protected against any damage or deterioration. The corncrib, surrounded by dense vegetation, was built after 1843.

The mule barn is a two-story structure built prior to 1843. There are wooden planks over the dirt floor. The remnants of the stalls and troughs are still in place, including areas worn down by the animals stabled there. There is a crescent-shaped cornice on the barn, which is also present on the Hampton mansion greenhouse.

Hampton could be viewed as a prototype for iron and steel mills which developed later in the 19th and 20th centuries. Its farm was an important element in the early efforts toward industrialization.

As I have mentioned, the farm produced the food and other necessities for the slaves as well as the residents of the Mansion. In addition, the farm was profitable in itself. The estate produced prize-winning racehorses, cattle, sheep and swine.

The farming activities predominated as the profitability of the ironworks began to decrease, and by the mid-19th century it was the profits generated by the agricultural activities which supported the elegant life at the mansion.

As my colleagues can see, the farm buildings were very important to the estate. And since those structures are still standing, we should do all we can to protect them.

The builder of Hampton Mansion, Charles Ridgely II was a public servant, in addition to being a businessman. He served the State of Maryland in a number of capacities, beginning as a representative to the General Assembly from 1790-95; as a Maryland State Senator from 1796-1800; and finally as Governor of the "Old Line State" from 1815 to 1818.

The Hampton mansion and grounds remained in the hands of the Ridgely family until 1948, when it was designated a national historic site. Mr. President, on March 9, I wrote to the Director of the National Park Service requesting his views on the proposed Hampton expansion. On March 24, I received a reply from the Director of the Mid-Atlantic Region, which I ask unanimous consent to have printed in the Record.

There being no objection, the letter was ordered to be printed in the Record as follows:

Hon. Charles McC. Mathias, Jr. U.S. Senate, Washington, D.C.

Dear Senator Mathias:

Your letter of March 9 to Director Whalen, concerning acquisition of 17 acres of land adjacent to Hampton National Historic Site was referred to me for a reply.

 $I \ have \ discussed \ this \ matter \ with \ Mr. \ Harrison, \ and \ feel \ the \ proposal \ has \ merit. \ However \ its \ inclusion \ in \ the \ National \ Historic \ Site \ would, \ of \ course, \ require \ the \ support \ of \ the \ National \ Park \ Service \ and \ the \ Department \ of \ the \ Interior \ with \ accompanying \ specific \ legislative \ authorization.$

This office has begun to prepare the necessary legislative support data so as to be ready should such data be requested by the Director, National Park Service.

Sincerely yours, Richard L. Stanton, Regional Director, Mid-Atlantic Region

Mr. MATHIAS. Mr. President, we will not have this opportunity again. The Ridgely farm, in all likelihood will be divided among the heirs of Mr. D. Stewart Ridgely, a banker, sportsman, and last member of his family born at Hampton, who was killed in a traffic accident this past summer. I therefore urge the Energy and Natural Rescues Committee to act now to accept this amendment.

ORDER ADDING CERTAIN LANDS AT HAMPTON NATIONAL HISTORIC SITE, BALTIMORE COUNTY, MARYLAND

December 23, 1953, 18 F.R. 8874

Whereas, the following parcel of land adjoining Hampton National Historic Site in the Ninth Election District of Baltimore County, State of Maryland, has been purchased by the United States as an addition to, and for use in administering, developing, protecting and interpreting, the said National Historic Site:

Now, therefore, by virtue of and pursuant to the authority contained in the act of August 21, 1985 (49 Stat. 666, 16 U.S.C., 1946 ed., secs. 461, et seq.), the following described land is hereby added to and made a part of the Hampton National Historic Site:

All that parcel of land situate in the Ninth Election District of Baltimore County, in the State of Maryland, and which, according to a survey dated January 27, 1953, prepared by Dollenberg Brothers, Surveyors, is found to be within the following metes, bounds, courses and distances, to wit:

Beginning for the same at a point in the center of a 50-foot road heretofore laid out, and at the beginning of the thirteenth or N. 71° 56' W., 176.45 feet line of a parcel of land which by a deed dated January 23, 1948, and recorded among the Land Records of Baltimore County in Liber J.W.B. No. 1618, folio 391, was conveyed by John Ridgely, Jr., and wife to the United States of America, and running thence with and binding on the thirteenth and fourteenth lines of said parcel of land, as the courses are referred to in the true meridian, the two following courses and distances, viz: N. 71° 56' W., 176.45 feet and N. 4° 27' E., 393.25 feet to the south side of Hampton Lane, heretofore laid out 50 feet wide, thence binding on the south side of said Lane as now extended, with the right and use thereof in common with others entitled thereto, N. 76° 0' E., 250.87 feet to the center of the first herein mentioned 50-foot road, as now extended, and thence binding in the center of said 50-foot road, with the right and use thereof in common with others entitled thereto, S. 11° 49" W., 518.50 feet to the place of beginning. Containing 2.118 acres of land, more or less.

The administration, protection, and development of the land hereinabove described as a part of the said National Historic Site shall be exercised in accordance with the provisions of the act of August 21, 1935, supra.

Warning is expressly given to all unauthorized persons not to appropriate, injure, destroy, deface, or remove any feature of this addition to said Site.

In witness whereof, I have hereunto set my hand and caused the official seal of the Department of Interior to be affixed, in the city of Washington, this 23rd day of December 1953.

[SEAL]

FRED G. AANDAHL,

Assistant Secretary of the Interior

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

December 13, 2010

Ms. Gay Vietzke Superintendent National Park Service Hampton National Historic Site 535 Hampton Lane Townson, Maryland 21286-1397

Re: Hampton National Historic Site, Draft General Management Plan and Environmental Impact Statement, Townson, Maryland (CEQ #20100403)

Dear Ms. Vietzke:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1509), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan and Environmental Impact Statement for the Hampton National Historic Site in Townson, Maryland.

The purpose and need for the Draft General Management Plan/Environmental Impact Statement (GMP/EIS) is to provide a clear definition of the park's purpose, significance, fundamental resources and values, and the direction that will guide and coordinate all subsequent planning and management for 15 to 20 years into the future.

The Hampton National Historic Site (Hampton NHS) is a 62-acre unit of the National Park System. The area is of national significance as it is an example of Georgian architecture and landscape design. In addition, the American Revolution, establishment of a new economy, slavery, the Civil War, Emancipation and Reconstruction are reflected by the site's cultural resources. The site is a comprehensive assemblage of structures, landscapes, collections and archives, preserved by one family over ten generations. The Hampton NHS represents an unusually complete chronicle that reveals the daily activities of the Ridgely family, laborers and enslaved persons, and illustrates 18th and 19th century history and design.

To achieve the purpose and desired future conditions of the Hampton NHS, the NPS evaluated three alternatives: Alternative 1—No Action Alternative, Alternative 2—Experiencing the Past; and Alternative 3—Broadening the Hampton Experience (Preferred Alternative). Alternatives 2 and 3 differ in the approach to the visitor experience, the extent of landscape rehabilitation and the use of buildings that would be proposed. The NPS has designed

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Alternative 3 as the environmentally preferred alternative. Alternative 3 recommends a more limited rehabilitation of the formal garden, west field and ornamental plantings and would rely on multiple approaches to experience the Ridgely estate. The primary historic buildings would be interpreted, but others would be rehabilitated to accommodate collections, administration and visitor services

EPA understands that the GMP is a programmatic document where impacts are addressed in general terms and recognizes that the EIS serves as a basis for the preparation of more in-depth NEPA documents to assess subsequent developments or management actions. However, because the DEIS does not have pertinent information to fully assess environmental impacts, EPA rated the document an EC-2 (Environmental Concerns/Insufficient Information) which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of EPA's ranking system is enclosed for your information.

EPA developed comments and questions which are presented in the Technical Comments (enclosure). Of particular concern are impacts to wetlands and threatened and endangered species as well as protection to human health from exposure to radon.

Thank you for providing EPA with the opportunity to review this project. We look forward to reviewing the FEIS and future/tiered environmental documents. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

Barbara Rudnick NEPA Team Leader

Office of Environmental Programs

Enclosure (4)

Technical Comments

Radon

As noted on page 27 under "Health," levels of radon in the mansion basement are a potential risk to employee and visitor health. Installation of a venting system proved inadequate; therefore, no use is proposed for the basement that would necessitate people spending extended periods of time in this space. The FEIS should include locations and dates of radon samples collected and sample results. Additional information, including how long the ventilation system operated and the sampling or monitoring that has occurred, should be documented. The FEIS should discuss whether adjoining area to the basement were sampled, and if the additional sampling was performed, the results of the sampling, to identify if there is any risk to human health elsewhere in the house. It is recommended that data be collected to determine if continued operation of ventilation could reduce radon levels or if other radon mitigation methods should be sought to lower the hazardous levels of radon in the basement. While remediation is underway, restriction and notification of risk should be publicly displayed to alert workers and the public of exposure to radon in the basement.

Cultural Resources

Page 49, Table 2-3: List of Major Projects by Alternative notes the construction of mansion side visitor contact station for Alternative 3 (Preferred Alternative). It is not clear if the visitor contact station would have an impact on the integrity of the historic mansion. Page 43 states that a mansion side small visitor contact station would be located in the Support Zone. Therefore it is assumed that the small visitor contact station is away from the mansion. Distance/proximity of the small visitor contact station should be defined in relation to the mansion. Please explain in the Final EIS.

The size and configuration of the historic and support zones for Alternatives 1, 2 and 3 vary. The Support Zone for Alternative 3 (Preferred Alternative) is largest in comparison with the other alternatives. In addition, it is assumed that the protected Historic Zone is reduced for Alternative 3 (Preferred Alternative). Please explain in the Final EIS how the zones were derived, why the larger support zone is needed for Alternative 3 (Preferred Alternative) and if there is a difference in protection of resources for the designated Historic Zone and Support Zone.

Wetlands

Page 68 states, "Baltimore County floodplain maps and the U.S. Fish and Wildlife Service's National Wetlands Inventory (1981) show no floodplains or wetlands identified within the park boundaries." Because the maps referenced are close to 30 years old, it would seem prudent to do a current wetlands inventory. This is also warranted since the DEIS references areas that may be classified as wetlands. For instance, page 68 notes that a band of hydric soil and hydrophytic vegetation extends along the banks of the dairy stream, the western border of the mansion site, and the far southern boundary of the park in the wooded area next to the I-695

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noise wall. The vegetation associated with this area should be identified and delineated because of the possible presence of wetlands. The text states, "The narrow strips of palustrine forested, broad-leaved deciduous wetlands along the dairy stream banks are similar to those found in two streams near the park, one about 800 feet east of Hampton's boundary adjacent to an unnamed tributary to Loch Raven Reservoir, and the other about 800 feet west of the park boundary along Hampton Branch."

Similarly, page 98 states that there "...is a small stream system emanating from the spring inside the dairy. The stream runs 442 feet from the dairy eastward to a concrete enclosed culvert. Its banks include narrow bands of palustrine forested, broad-leafed deciduous riparian wetland areas (no greater than 10-12 feet at the eastern boundary). This stream is approximately 3 feet in width with an approximately 50 foot riparian buffer, and only minimal floodplain is directly associated with it."

It is important to note that Wetlands present on, or immediately surrounding the site should be delineated according to the 1987 Federal Manual for Identifying and Delineating Jurisdictional Wetlands. Impacts to wetlands should be avoided or minimized whenever possible. The total size of the wetlands should be provided, in addition to the size of the wetland in the study area and size of the direct impact. The FEIS must analyze the size and functional values of all impacted wetlands and develop a mitigation plan for their replacement.

Vegetation/Threatened and Endangered Species

Page 68 states, "A total of 823 native and exotic trees and shrubs have been identified by park staff as important elements of the site's designed landscape." Is there a descriptive list that breaks down the 823 native and exotic trees as well as identifies threatened and endangered species to be included as an appendix in the FEIS?

The Endangered Species Act (ESA) provides for the listing of endangered and threatened species of plants and animals as well as the designation of critical habitat for listed species. The ESA prohibits the taking of any listed species without (for federal agencies) an "Incidental Take Statement." The definition of "taking" includes injury and harassment. The ESA also requires federal agencies to exercise their authorities, in consultation with designated agencies (in effect, the U.S. Fish and Wildlife Service and National Marine Fisheries Services, as appropriate), to conserve endangered species. It further requires federal agencies to consult with these agencies on any action that may jeopardize the continued existence of any threatened or endangered species, which has been interpreted by regulation to require consultation for any action that "may affect" such species. For actions that may adversely affect species, the regulatory agencies may recommend mitigation. Such mitigation is required if an agency action would otherwise jeopardize the species existence, and it may be required if agency action will result in a take and, therefore, require an incidental take authorization. The FEIS should provide a description of terrestrial, wildlife and aquatic species in the study area. Any threatened or endangered species must be listed. Critical habitat for threatened or endangered species should be properly identified. The FEIS should describe the potential impacts to these species from the proposed action.

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The DEIS states that the proposed actions for Hampton NHS will not alter the existing habitat or negatively impact wildlife within the boundaries of the park. It also states that the wildlife in the park is common to the area. However, designated agencies of authority should be notified of the proposed action and given the opportunity to evaluate and assess for potential impacts.

The most recent state and federal threatened and endangered species coordination letters should be included in the FEIS. In addition, we recommend that the appropriate state and federal agencies be contacted annually at a minimum regarding these issues.

Invasive Species

As noted on page 102, removal of invasive exotic plants is intended. The FEIS (or future NEPA documentation) should identify and quantify the invasive exotic plants to be removed as well as the plan for this action.

Invasive species effects on water resources can be direct, as in the case of many aquatic nuisance species, or indirect, as in terrestrial species that change water tables, runoff dynamics, fire frequency, and other watershed attributes that in turn can alter water body conditions. Indirect social/behavioral effects of invasive species can result in significant water quality impacts as well; for example, fear of non-native pests may prompt more pesticide and herbicide use, potentially increasing the amount of these chemicals entering water bodies through runoff. Both terrestrial and aquatic invasive species can be harmful to our waters — some affect the water directly, while other species affect the land in ways that harm the water. The threat of invasive species should be evaluated and mitigation measures addressed.

Low Impact Development

EPA understands that the GMP is a programmatic document; therefore the impacts are addressed in general terms. However, EPA would like to see the following comment addressed in future NEPA documentation.

Page 84 states, "There would still be short-term, minor negative impacts from ground disturbance and materials storage during construction and long-term, minor to moderate negative impacts from the intrusion of the relocated parking lots, roads and pathways into the cultural landscape." The DEIS does not estimate the ground disturbance, size of parking lots, roads and pathways needed. In future environmental documentation, EPA would like to see an estimate of ground disturbance and impervious surface to result from the proposed action as well as the location of proposed actions to fully assess impacts.

EPA appreciates and encourages the NPS to pursue sensitive site design, screening and the use of environmentally sustainable materials selection to limit impacts from the proposed action. A Presidential Memorandum (dated April 26, 1994) and Guidance (dated August 10, 1995) applicable to Federal facilities and federally funded projects pertinent to environmentally and economically beneficial landscape practices is to be incorporated into all NEPA-related documents. As outlined in Executive Order 13148 dated April 26, 2000 (Federal Register Vol.

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65, No. 81) on Greening the Government, it has been directed that all agencies incorporate the above Guidance into landscape programs, policies and practices. The Guidance calls for agencies that fund and landscape to provide recipients with information of beneficial landscaping as well as to work to support and encourage application of the principles. The EPA, GSA and USDA are tasked with providing technical information on beneficial landscaping to other federal agencies and their facilities. The effort, also recognized as low impact development, has the potential to reduce impacts on watershed hydrology and aquatic resources. This is described in the enclosure provided.

Energy Efficiency

This project presents an excellent opportunity for the NPS to implement the President's Executive Order 13423-- Strengthening Federal Environmental, Energy, and Transportation Management by incorporating energy efficiency into the retrofit and/or construction efforts for the Hampton NHS as well as Executive Order 13514-Federal Leadership in Environmental, Energy, and Economic Performance. Enclosed is information that EPA recommends the NPS consider in the retrofit/construction phase of the proposed action.

Distribution List

The DEIS should have included a Distribution List of agencies, organizations, and persons to whom copies of the document were sent as indicated in 40 CFR §1502.10 under "Recommended format: and §1502.19. A Distribution List identifies those parties who have been given the opportunity to comment and reveals that those not included on the list may need to be given the DEIS for review. This information is critical to ensuring all necessary parties are given the opportunity to review and provide input to the impacts of the proposed action. Since this list was not included in the DEIS, please provide it in the FEIS.

Miscellaneous

In the Table of Contents, the spelling of "Vegetation" should be corrected and the referenced page should be changed from page 102 to page 101.

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I32 APPENDIX



Martin O'Malley, Governor Anthony G. Brown, I.I. Governor John R. Griffin, Secretary Joseph P. Gill, Deputy Secretary

April 5, 2011

Mr. Peter Iris-Williams National Park Service – NE Region 200 Chestnut Street Philadelphia, PA 19106

RE: Environmental Review for Hampton National Historical Park, Towson, Baltimore County, Maryland.

Dear Mr. Iris-Williams:

The Wildlife and Heritage Service has determined that there are no State or Federal records for rare, threatened or endangered species within the boundaries of the project site as delineated. As a result, we have no specific comments or requirements pertaining to protection measures at this time. This statement should not be interpreted however as meaning that rare, threatened or endangered species are not in fact present. If appropriate habitat is available, certain species could be present without documentation because adequate surveys have not been conducted.

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at (410) 260-8573.

Sincerely,

Lori A. Byrne,

Environmental Review Coordinator Wildlife and Heritage Service MD Dept. of Natural Resources

ER# 2011.0432.ba



Martin O'Malley Governor

Anthony G. Brown Lt. Governor Richard Eberhart Hall Secretary

Matthew J. Power Deputy Secretary

April 8, 2011

Gay Vietzke Hampton National Historic Site 535 Hampton Lane Towson, Maryland 21286-1397

Re: L

Draft General Management Plan and Environmental Impact Statement (GMP)

Hampton National Historic Site (BA-103 / 18BA95)

Baltimore County, Maryland

Dear Superintendent Vietzke:

Thank you for providing the Maryland Historical Trust (Trust) with a copy of the above-referenced draft General Management Plan (GMP) / Draft Environmental Impact Statement (DEIS), which we received February 7, 2011. Trust staff reviewed the document pursuant to Section 106 of the National Historic Preservation Act (NHPA) and the relevant provisions of the National Park Service Nationwide Programmatic Agreement. We offer the following comments regarding effects on historic and archeological properties.

The draft document presents detailed information and justification regarding the goals, resources, and alternatives NPS considered during the development of the GMP. The GMP places strong emphasis on ensuring the appropriate long-term maintenance, preservation, and interpretation of the important historic structures, cultural landscapes, and archeological sites that comprise the Hampton National Historic Site. Based on the information presented in the GMP, the Trust supports the NPS preferred alternative, Alternative Three. Alternative Three represents a sound basis for facilitating visitor experience, operations and maintenance, and partnerships while ensuring the appropriate stewardship and interpretation of this significant historic site. We look forward to working with NPS to complete the Section 106 review of the individual components of Alternative 3, as needed, as the National Park Service proceeds with the planning and implementation of the preferred alternative.

If you have questions or need further assistance, please contact Jonathan Sager at 410-514-7636 / jsager@mdp.state.md.us or me at 410-514-7631 / bcole@mdp.state.md.us. Thank you for providing us this opportunity to comment.

Sincerely,

Beth Cole

Administrator, Project Review and Compliance

Maryland Historical Trust

EJC/JES /201100466

cc:

Anna von Lunz (NPS)

Seth Colon

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PLANNING TEAM

HAMPTON NHS

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Laurie Coughlan, Management Assistant
Paul Bitzel, Chief of Resource Management
Wayne Boyd, Facility Manager
Vincent Vaise, Chief of Interpretation
Gregory Weidman, Curator
John Pousson, Archeologist
Kirby-Lynn Shedlowski, Park Ranger
William Curtis, Park Ranger
Anna Von Lunz, Cultural Resource Specialist

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Terrence Moore, Chief of Planning and Compliance
Allen Cooper, Chief of Park Planing and Special Studies
Jacki Katzmire, Natural Resource Specialist and Compliance
Cheryl Sams O'Neal, Cultural Landscape Architect and Compliance
James Farrell, Graphics and GIS
Peter Iris-Williams, Community Planner

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Dennis R. Reidenbach, Regional Director, Northeast Region
Michael Reynolds, Deputy Regional Director, Northeast Region
Maryanne Gerbauckas, Associate Regional Director, Northeast Region
Michelle Batcheller, Natural Resource Specialist
Mark Isaksen, Curator
Peggy Albee Vance, Historic Architecture
Greg McGuire, Facility Manager

ADVISORS

Historic Hampton, Inc. Preservation Maryland

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ELECTED OFFICIALS

Senator Barbara Mikulski
Senator Benjamin Cardin
Senator Paul Sarbannes (retired)
Congressman Paul Ehrlich
Congressman Wayne Gilchrest
Congressman Dutch uppersberger
Congressman John Sarbannes
Governor Martin O'Malley
Governor Robert Ehrlich (retired)
Governor Parris Glendenning (retired)
Baltimore County Executive

FEDERAL AGENCIES

Advisory Council on Historic Preservation U.S. Environmental Protection Agency U.S. Fish and Wildlife Service

STATE AGENCIES

Maryland Office of Tourism

Maryland Department of Planning,

Maryland Historical Trust

Maryland Department of Natural Resources

Maryland Department of Transportation

COUNTY AGENCIES

Baltimore County Council
Baltimore County Office of Planning
Baltimore County Department of Public Works,
Transportation Planning Unit
Baltimore County
Department of Economic Development
Baltimore County Library System
Baltimore County Historical Society
Baltimore County Office of Tourism

PARTNERS

Historic Hampton, Inc. Hampton Improvement Assoiaiton Preservation Maryland Towson Chamber of Commerce

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Hampton National Historic Site is part of the National Park System, one of more than 390 units preserving important examples of our nation's natural and cultural heritage. For information on the system, visit the NPS web site at *www:nps.gov*.

As the nation's principal conservation agency, the U.S. 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.



