



Draft Master Plan Amendment Environmental Assessment 2005



National Park Service
U.S. Department of the Interior

Theodore Roosevelt Inaugural National Historic Site
Buffalo, New York

Draft Master Plan Amendment Environmental Assessment

Prepared by:
Theodore Roosevelt Inaugural Site Foundation
Northeast Region, National Park Service
2005

Dear Reviewer:

We are pleased to share with you this Draft Master Plan Amendment / Environmental Assessment for the Theodore Roosevelt Inaugural National Historical Site in Buffalo, New York. This document describes a number of alternatives for providing additional interior space at the National Historic Site, and assesses the potential environmental effects of those alternatives on park resources and visitor experience.

Public involvement is very important to our planning effort. We encourage you to share your thoughts with us on the alternatives presented in this document. This draft is available for your review for 30 days. During this period, we—the Theodore Roosevelt Inaugural Site Foundation and the National Park Service—will accept written and oral comments regarding the alternatives. Please include your name and address, as we cannot accept anonymous comments. We will carefully review all substantive comments and incorporate them, as appropriate, into our planning. Once the document is made final, we will undertake the necessary actions to implement this Amendment as funding and other contingencies allow.

Please contact us via phone, fax, email, or mail at the address provided below. We are looking forward to hearing from you.

Sincerely,

Molly Quackenbush
Superintendent / Executive Director
Theodore Roosevelt Inaugural Site Foundation

Please submit your comments to:

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"I shall take the oath at once in accord with the request of you members of the Cabinet, and in this hour of our deep and terrible national bereavement I wish to state that it shall be my aim to continue absolutely unbroken the policy of President McKinley for the peace, the prosperity and the honor of our beloved country."

**--Theodore Roosevelt,
Ansley Wilcox House, Buffalo, New York
September 14, 1901**

Executive Summary

The Site

Congress established the Theodore Roosevelt Inaugural National Historic Site (NHS) via Public Law 89-708 on November 2, 1966. The purposes of the one-acre NHS are twofold: (1) to preserve the Ansley Wilcox House in Buffalo, NY, where Theodore Roosevelt became the 26th president of the United States on September 14, 1901; and (2) to provide opportunities for visitors to understand the historical events surrounding the inauguration, as well as the lasting significance of Theodore Roosevelt's life and presidency. The NHS is historically significant because it was in the library of the Ansley Wilcox House that TR took the oath of office following the assassination of President William McKinley. The Wilcox House is one of only five presidential inaugural sites located outside of Washington, D.C. and illustrates the peaceful transfer of power that is a hallmark of our democratic process.

The Foundation

The enabling legislation stipulates that operation of the NHS be supported by private funds. While the federal government owns the property, the Theodore Roosevelt Inaugural Site Foundation operates and manages the NHS through a cooperative agreement with the National Park Service (NPS). The Foundation has met the challenge of raising funds to operate the park from its inception. In addition to raising funds for the initial restoration of the property, it was responsible for all management and operational costs of the NHS until 1980, when new legislation stipulated that the NPS contribute up to 2/3 of the annual operating budget. Since then, the Foundation has successfully managed the site and contributed its share of operating support, and from Fiscal Year 2000 at more than 50% of the total budget.

Need for the Plan

The NHS is a thriving cultural center offering interpretive, educational, and special event programs for walk-in visitors, school groups, and the broader community. In addition to providing resource interpretation for some 15,000–20,000 visitors per year, the Wilcox House serves as headquarters for the Foundation and a sizable core of active volunteers. The mix of activities that take place in the House (sole structure on the site)—administration, board meetings, volunteer projects, event preparation, lectures, exhibit viewing, guided tours, collection conservation, maintenance operations, children's school programs—presents programmatic and functional limitations for use of the structure. The limitations were examined in a "needs assessment" prepared by team members. The needs assessment revealed that the site operation has outgrown its present building and requires additional space and an upgrade of building systems to accomplish an efficient and safe use of the facility and support the NHS mission. The guiding document currently in effect for the NHS, the 1967 Master Plan, did not anticipate such facility requirements and provides little direction on how best to accommodate additional interior space.

Alternatives Considered

The Master Plan Amendment evaluates six alternative ways to better provide interior space for site operation:

- Alternative A is the "no action" alternative, which serves as a baseline for evaluating other alternatives.
- Alternative B seeks to remedy the most pressing planning issues facing the NHS within existing available space. It is a "minimal action" alternative that is based on recommendations made in a 1999 report by the architecture firm, Bargmann, Hendrie + Archetype, Inc.
- Alternative C proposes to acquire or lease an existing building outside of the NHS boundary to provide space for administrative and curatorial purposes. A boundary adjustment would be required if the NPS were to own and operate the off-site facility.
- Alternative D proposes to construct a new addition on the site of the former carriage house to provide additional interior space. The addition would be connected to the 1938 "infill area" of the Wilcox House. It would be of similar massing and scale to the historic carriage house, but not an

exact replica. Consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the façades of the new addition would be compatible with the historic structure, but be of obviously modern construction.

- Alternative E proposes to construct a new addition to the Wilcox House to provide additional interior space. The addition would be connected to the east façade of the house, protruding toward the parking area. The new addition would be of similar materials and detailing to the Wilcox House, but be of obviously modern construction.
- Alternative F proposes to construct a new, stand-alone structure on property within the NHS, but outside of the 1901 property line. The new structure would provide space for visitor services, which would free up space in the Wilcox House for administrative and curatorial functions. Under this alternative, no boundary adjustment would be required.

Preferred Alternative

Of the six alternatives considered, the team determined that “Alternative D: New Addition on Carriage House Site” best fulfills the objectives of the NHS with the least impact on the resources. It provides sufficient additional square footage, but in a way that is compatible with the cultural landscape. It returns the original massing and scale of the carriage house to the landscape, unlike alternatives E and F, which introduce modern intrusions that did not exist in 1901. And, unlike alternatives C and F, it provides this space without requiring the Foundation and the NPS to own and operate two separate properties, with all the redundancies of equipment, services, and staffing that two independent structures require.

Next Steps

Once the public review period is complete, the planning team will analyze the comments and refine the proposals, if warranted. The final step in the process is to issue a Finding of No Significant Impact.

PART ONE: BACKGROUND 9

INTRODUCTION	9
SITE PURPOSE AND SIGNIFICANCE	9
SITE DESCRIPTION	10
HISTORICAL BACKGROUND	12
PURPOSE AND NEED FOR THE MASTER PLAN AMENDMENT	13
IMPACT TOPICS INCLUDED IN THIS DOCUMENT	16
IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS	17
PLANNING CONTEXT	21

PART TWO: ALTERNATIVES 24

APPLICABLE LAWS, POLICIES, AND MANDATES	24
ALTERNATIVE A: NO ACTION	26
ALTERNATIVE B: RECONFIGURE EXISTING STRUCTURE	28
ALTERNATIVE C: ACQUIRE OR LEASE OFF-SITE FACILITY	30
ALTERNATIVE D: CONSTRUCT NEW ADDITION ON SITE OF FORMER CARRIAGE HOUSE (PREFERRED ALTERNATIVE)	32
ALTERNATIVE E: CONSTRUCT NEW ADDITION ON EAST SIDE OF HISTORIC STRUCTURE	34
ALTERNATIVE F: CONSTRUCT NEW FACILITY ON NON-HISTORIC PORTION OF NHS	36
ELEMENTS COMMON TO ALL ACTION ALTERNATIVES	38
SUMMARY OF ALTERNATIVES	38
SUMMARY OF COSTS	41
CONCLUSION	41
ALTERNATIVES CONSIDERED BUT NOT ADVANCED	42
PROPOSED ACTION: BOUNDARY ADJUSTMENT	42
APPLICATION OF NATIONAL PARK SERVICE CRITERIA FOR BOUNDARY ADJUSTMENTS	44
MANAGEMENT ZONING	45

PART THREE: AFFECTED ENVIRONMENT 47

ARCHEOLOGICAL RESOURCES	47
COLLECTIONS	47
CULTURAL LANDSCAPE	47
HISTORIC STRUCTURE	48
OPERATIONS	49
UNIVERSAL ACCESS	49
VISITOR USE AND EXPERIENCE	49

PART FOUR: ENVIRONMENTAL CONSEQUENCES 51

INTRODUCTION	51
METHODOLOGY FOR ANALYZING IMPACTS	51
CRITERIA FOR IMPACT INTENSITIES	52
ENVIRONMENTAL IMPACTS OF EACH ALTERNATIVE	54
IMPAIRMENT OF RESOURCES	63
ENVIRONMENTALLY PREFERRED ALTERNATIVE	64
SECTION 106 COMPLIANCE REQUIREMENTS FOR UNDERTAKINGS	64

PART FIVE: CONSULTATION AND COORDINATION 66

PLANNING PROCESS	66
CONSULTATION	67
LIST OF PREPARERS	68

APPENDICES 69

APPENDIX A: LEGISLATION 69

APPENDIX B: LIST OF CLASSIFIED STRUCTURES 74

APPENDIX C: GLOSSARY 75

APPENDIX D: SELECTED RESOURCES CONSULTED 77

Part One: Background

Introduction

The Theodore Roosevelt Inaugural National Historic Site (NHS) is a thriving cultural center offering interpretive, educational, and special event programs for walk-in visitors, school groups, and the broader community. A recent assessment of available facilities at the NHS has revealed that the site operation has outgrown its present building and requires additional space. An upgrade of building systems and redesign of space is required to accomplish an efficient and safe use of the facility and support the NHS goals and mission. The guiding document currently in effect for the NHS, the 1967 Master Plan, did not anticipate these facility requirements and provides little direction on how best to accommodate additional interior space. The Theodore Roosevelt Inaugural Site Foundation (the Foundation) and the National Park Service (NPS) are undertaking this Master Plan Amendment / Environmental Assessment to evaluate a range of alternatives that would provide efficient and safe use of the facility, while preserving the resources and values for which the NHS was established.

Site Purpose and Significance

Congress established the Ansley Wilcox House and grounds as the Theodore Roosevelt Inaugural National Historic Site (Public Law 89-708) on November 2, 1966. The enabling legislation authorizes the acquisition and preservation of the NHS and stipulates that its operation and maintenance be supported by private funds. While the federal government owns the property, the Foundation, which was named as the operating entity in 1980 (Public Law 96-607), operates and manages the NHS through a cooperative agreement with the NPS.

The purposes of the Theodore Roosevelt Inaugural NHS are twofold:

- To preserve the Ansley Wilcox House in Buffalo, New York, where Theodore Roosevelt became the 26th president of the United States on September 14, 1901.
- To provide opportunities for visitors to understand the historical events surrounding the inauguration, as well as the lasting significance of Theodore Roosevelt's life and presidency.

The NHS is historically significant because it was in the library of the Ansley Wilcox House that Theodore Roosevelt took the oath of office following the assassination of President William McKinley. The Wilcox House is one of only five presidential inaugural sites located outside of Washington, D.C. and illustrates the peaceful transfer of power that is a hallmark of our democratic process. Roosevelt's 1901 inauguration launched a presidency that has had a major influence on both the office of the presidency and our nation's development. Ansley Wilcox, a prominent lawyer, was a contemporary and acquaintance of Roosevelt and invited him to stay in his home when Roosevelt arrived in the city after McKinley was shot at the Pan-American Exposition in Buffalo.

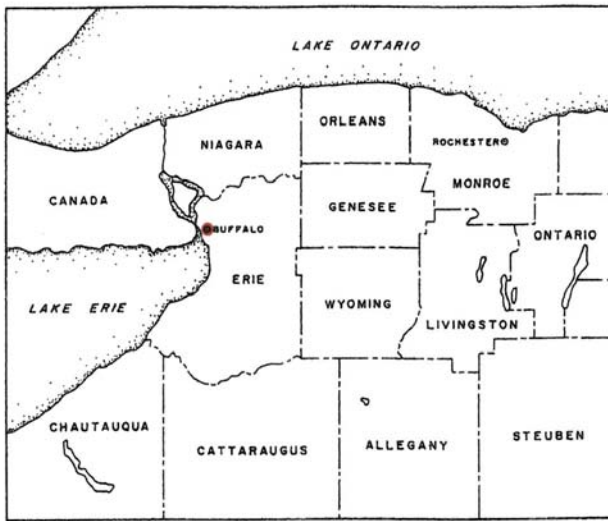


Figure 1 (Above): Northwestern New York
Figure 2 (Right): City of Buffalo



Site Description

Theodore Roosevelt Inaugural NHS is located on 641 Delaware Avenue, Buffalo, New York. The City of Buffalo is situated on the eastern shore of Lake Erie at the mouth of the Niagara River in Erie County.

The primary feature of the NHS is the Greek-Revival Ansley Wilcox House. The house is an impressive three-story structure, with painted brick, a two-story colonnaded front portico, and a Palladian pediment window.

In the early 20th century, Delaware Avenue was one of Buffalo's finest residential neighborhoods. Its streets were lined by triple rows of elms, with homes set back from the wide boulevard. Today, the Ansley Wilcox House stands as a reminder of that era. The majority of the surrounding Victorian homes and grounds have been replaced by modern commercial structures. The character of the area has changed from a stately Victorian residential neighborhood to a bustling commercial downtown.

The NHS embraces over one acre of property bounded on the west by Delaware Avenue, on the east by Franklin Street, and on the north and south by contemporary commercial structures and a parking area. The house is set back from Delaware Avenue by a manicured lawn with granite steps set into a rise leading to the front portico. Several mature shade trees, including two *Ginkgo biloba* trees, and numerous shrubs are located on the grounds. A partially paved drive leads from Delaware Avenue to the north side of the house. A small brick storage structure and garden area have been developed on the northeastern corner of the NHS. The southeast portion of the site is devoted to parking for roughly 45 vehicles to serve both visitors to the NHS as well as customers to the adjacent bank.

The property on which the adjacent bank, the Bank of America, is situated was part of the Ansley Wilcox grounds in 1901. Today, that property is privately owned and is outside of the NHS boundary. The legislation that established the NHS references an easement held via a lease agreement with the owners of the adjacent bank property. The lease agreement was made originally with the Liberty Bank of Buffalo.

Today, these rights are retained by the current owners. The easement enables the bank to use a driveway ramp, automobile parking privileges for 15 cars, and ingress and egress to Delaware Avenue and Franklin Streets. This easement can be described as a “floating” easement, because the exact locations of the 15 parking spaces, the ramp, and the ingress/egress are not specified.

Visitors arrive at the Ansley Wilcox House via the parking area off of Franklin Street at the rear of the structure. From the parking area, visitors proceed to the north entrance of the house, which was the primary entrance used by the Wilcox Family. After moving through the admissions area, visitors then proceed to the orientation room at the east end of the 1st floor to view introductory exhibits. Visitors are then guided through the restored library, morning room, and dining room. An exhibit area across from the library provides further information on the inaugural and on Roosevelt’s presidency. Visitors then proceed to the 2nd floor to view exhibits, the re-created Victorian Lady’s Bedroom, and visit the gift shop.

In addition to being the primary interpretive feature at the NHS, the Wilcox House also supports curatorial storage, maintenance functions, and administration uses. These functions are distributed throughout the building, from the basement level to the 3rd floor.

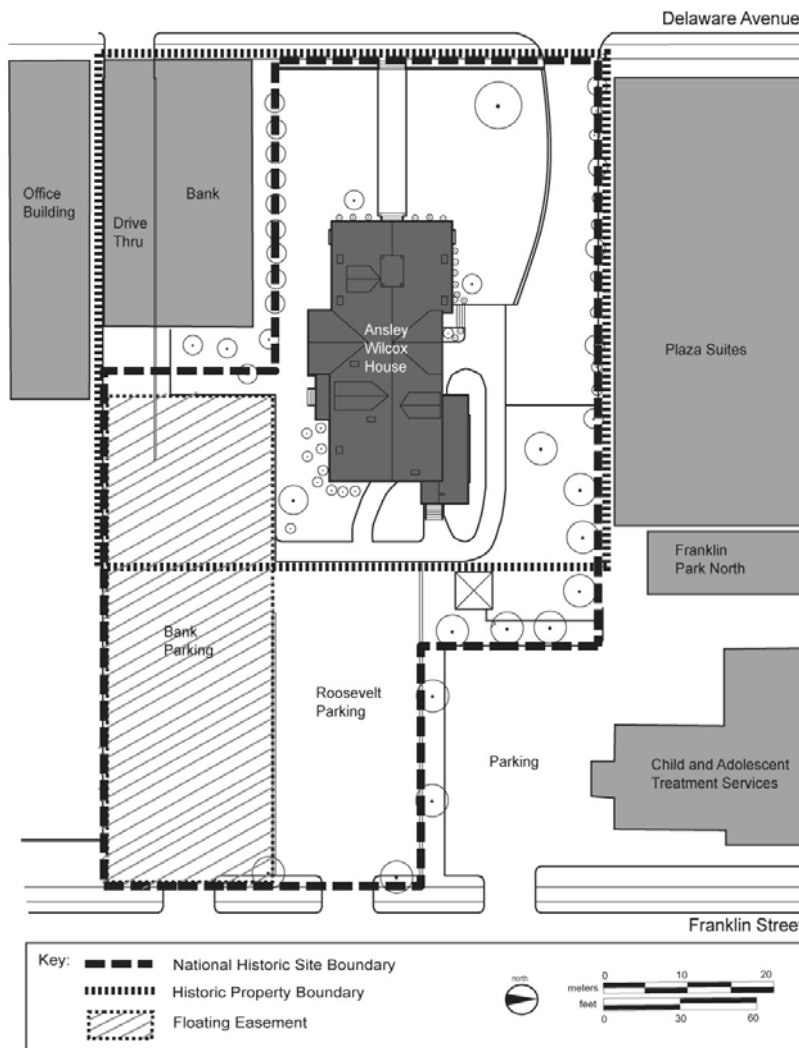


Figure 3:
Site boundaries

Historical Background

The Site

In 1837, concerned over an insurrection in Canada known as the Patriot's War, the citizens of Buffalo requested that the federal government provide for their protection in the event of an attack. In response, the government established an army post on the highest ground within the city limits. The barracks, known as the Buffalo Barracks or Pointsett Barracks (after Secretary of War Joel Pointsett), consumed a large square block between North Street, Delaware Avenue, Allen Street, and Main Street. The barracks were built on land leased from Ebenezer Walden, one of Buffalo's early settlers. A parade ground formed the core of the barracks, with the military buildings, including company quarters for enlisted men, junior officers' quarters, storehouses, a guardhouse, and stables, erected around its perimeter. The barracks was the largest military installation of its day and, at its height, housed over 600 people. The front portion of what is now the Wilcox House was built in 1838 as officers' quarters. Three identical officers' quarters were built along Delaware Avenue. The Wilcox House is the only one of the three to survive.

In 1845, the government terminated the land lease and moved the soldiers to Fort Porter, a more strategic location along the Niagara River. By 1846 the barracks were abandoned and many of the buildings dismantled. The land reverted back to its earlier ownership and the remaining structures were adapted for other uses.

The officers' quarters structure then passed into private ownership. In 1863, Albert P. Lanning acquired the building. During his occupancy, Lanning added a two-story service wing on the east end of the structure and constructed a full basement under the main part of the house.

A large brick carriage house was added in the mid-19th century. The two-story carriage house was erected near the north side of the main structure. A narrow pathway ran between the house and the carriage barn.

In 1883, Dexter Rumsey purchased the house as a wedding gift for his daughter, Mary Grace, and her husband, Ansley Wilcox. In 1883, the couple moved in and made the residence their permanent home. The first change made by the Wilcoxes was the installation of a bay window in the south side of the library. In 1896, the Wilcoxes tripled the size of the original building by demolishing the Lanning service wing and adding approximately 60 feet of building to the east, including a basement, two floors, and an attic. The Wilcoxes lived in the house until their deaths in the early 1930s. Subsequent to their tenure, the house remained vacant for several years.

In 1938, Kathryn and Oliver Lawrence leased the house and extensively renovated the building for operation as a restaurant. Many walls and architectural features, such as the main staircase, were removed to accommodate a large dining area on the 1st floor and a large banquet space on the 2nd floor. During the Lawrence tenure, the house was extended by about 400 square feet on the north side. This "infill area" incorporated the south wall of the carriage house, which was torn down to provide parking for the restaurant. The Kathryn Lawrence Tea Room and Restaurant was opened by 1939 and for 20 years was one of the most popular restaurants in Buffalo.

In the early 1960s, the Wilcox House stood vacant and was an attractive nuisance for vandals. Following threats from a developer that the structure would be demolished for a parking lot, community volunteers led a major effort to secure the house's positive future. With legislation pending, the Liberty National Bank purchased the property and held it until federal funding could be secured. The Ansley Wilcox House was declared a National Historic Site in 1966 and opened to the public on September 14, 1971, seventy years after Roosevelt took the presidential oath.

The Foundation

As mentioned earlier, the enabling legislation stipulates that the operation and maintenance of the NHS be supported by private funds. An amendment enacted in 1980 authorizes the NPS to enter into cooperative agreements with the Foundation and to contribute up to 2/3 of the annual operating costs for the site. While the federal government owns the property, the Theodore Roosevelt Inaugural Site Foundation operates and manages the NHS.

The Foundation was granted a Provisional Charter by the Board of Regents for and on behalf of the Educational Department of New York State on May 25, 1967. The Provisional Charter was valid for a term of three years. The Provisional Charter specifies that the corporation is to be "an educational corporation under the corporate name of Theodore Roosevelt Inaugural Site Foundation." On July 31, 1970, the Board of Regents granted the Foundation an absolute charter.

The Foundation has met the challenge of raising funds necessary to operate the park from the beginning. Funds were raised for the initial restoration. The federal government, along with purchasing the Wilcox House, contributed only \$50,000 to the restoration. The Foundation was responsible for raising the additional funds, which was done through monetary and in-kind contributions from the community. The total estimate for the restoration and rehabilitation costs as noted in the Historic Structures Report Part II, 1969, was \$233,057.

The Foundation was responsible for all management and operational costs of the site until 1980, when new legislation stipulated that the National Park Service would contribute up to 2/3 of the annual operating budget. Since then, through renewable cooperative agreements, the Foundation has met its obligation of successfully managing the site and contributing its share of operating support, and from Fiscal Year 2000 at more than 50% of the total budget.

Purpose and Need for the Master Plan Amendment

Theodore Roosevelt Inaugural NHS provides interpretive and educational programming for 15,000 to 20,000 visitors annually. In addition to supporting the interpretive functions, the Ansley Wilcox House serves as the headquarters for the Foundation and for a sizable core of active and talented volunteers. The mix of activities that take place in the single historic structure—administration, board meetings, volunteer projects, event preparation, lectures, exhibit viewing, guided tours, collection conservation, maintenance operations, children's school programs—presents certain programmatic and functional limitations. The limitations were identified in a "needs assessment" prepared by team members in November 2004 and were further examined during an on-site planning workshop. The purpose of the Master Plan Amendment is to remedy the planning issues summarized below.

Safety Concerns

Certain functions housed in the historic structure present safety concerns. For example: only one means of egress exists from offices located on the 3rd floor; emergency egress from program spaces on the 2nd floor and basement is inhibited by blocked or indirect exits and narrow staircases; there is a lack of fire separation between means of egress and public spaces; and exit signs are unclear.

The electrical service is aging, providing insufficient power. There are exposed electrical conduits in public spaces, with overused electrical branch circuits and extension cords used to supplement receptacles.

Fire suppression systems are entirely lacking in the structure, placing it at risk of fire damage.

Collections Management

The NHS has a collection of over 5,000 objects including original furnishings, books, textiles, paintings and prints, clothing, china, glassware, and other domestic objects. About 70% of the collection is kept in storage. Current curatorial storage conditions and exhibit areas do not meet NPS requirements for museum collections. The current conditions threaten the long-term survival of artifacts and collections. These conditions also make monitoring, management, and preservation of the collection both extremely difficult and inefficient.

The aging heating, ventilation, and air conditioning (HVAC) systems in the house provide uneven heat distribution, with controls not functioning evenly or reliably. Air conditioning is provided only in one area of the basement. Minimal environmental controls and high moisture levels in the storage areas result in wide-ranging temperature and humidity levels, plus the storage areas have minimal controls in place for ultraviolet light and pests. Moisture levels can be very high in the basement, with moisture intruding at window wells periodically in the curatorial office and paper collection storage room.

Over the past four years, the NHS has gathered and analyzed temperature and relative humidity data from four locations within the Wilcox House. Within the storage areas, temperatures vary from a maximum of 91°F to a minimum of 53°F. Temperatures are within acceptable ranges established by NPS guidelines only 8% of the time. The relative humidity, which fluctuates from a maximum of 84% to a minimum of 9%, is within an acceptable range only about 27% of the time. The relative humidity regularly, if not constantly, exceeds the +/- 5% fluctuation per month recommended by NPS guidelines. One of the storage areas also faces significant risk by mold.

Within exhibit spaces, temperatures vary from a maximum of 85°F to a minimum of 53°F, and are within acceptable ranges only 21% of the time. The relative humidity in the exhibit areas ranges from a maximum of 74% to a minimum of 9%, and is within acceptable ranges only about 26% of the time. The relative humidity within the exhibit spaces, as with the storage areas, regularly, if not constantly, exceeds the +/- 5% fluctuation per month recommended by NPS guidelines. These areas are at risk from mold, as well.

Lacking centralized storage, the collection is stored in various rooms throughout the house, mostly very remote from the curatorial workspace. Curatorial workspace is not secure, as traffic through the space for egress, utility maintenance, and event preparation is necessary. The storage spaces are narrow, cramped, and difficult to organize, with collections stored in the attic in under-eave locations and in the basement with low headroom. No room exists for temporary collection storage. The extent of the storage space, in addition to the quality, is insufficient. For example, the NHS recently acquired a collection of approximately 200 items, many of which are framed works, that they simply do not have the space to store. These items are placed in aisles that are used to access other parts of the collection, creating access and safety concerns.

The site's Scope of Collections Statement (1999) concludes that the park needs a Collection Storage Plan, which has not been done.

Operations

As mentioned previously, the Ansley Wilcox House serves as the headquarters for the Foundation as well as its volunteers. Administration and other non-public spaces are interspersed with public spaces, interrupting visitor circulation to interpretive spaces. Administrative offices are immediately adjacent to visitor use spaces, creating acoustical, privacy, and security issues. Insufficient and non-centralized storage exists for administrative supplies. Administrative office equipment, such as copiers, fax machines, and computer servers, is dispersed in staff offices throughout the building, making use of the equipment both inconvenient and inefficient.

The Foundation raises nearly 50% of the NHS total annual operating budget (\$479,600 in Fiscal Year 2004) to support the NHS. To accomplish its mission, the Foundation hosts special events and other fund-raising opportunities at the NHS. The ability to host fund-raising activities is constrained by insufficient available space. The 2nd floor multi-purpose room is the only space remotely appropriate for such purposes. Its awkward configuration, the lack of 2nd floor restrooms, and the lack of universal access to the 2nd floor, however, limit the type of functions the Foundation can host.

The 170-square-foot area of the Wilcox House devoted to the maintenance office and workshop is insufficient. Likewise, the 60-square-foot exterior equipment shed is too small to house the NHS equipment, resulting in overflow equipment being stored in stairwell of the Wilcox House. Trash and recycling materials are stored in basement, presenting opportunities for pests and making it difficult for the staff to easily move the materials in and out of the house.

Education storage is spread throughout different areas of the building, impairing the use of other spaces. Insufficient storage for educational functions results in chairs, tables, and other bulky equipment being stashed away throughout building, particularly in the 2nd floor conference room and adjacent stair-hall.

Visitor Use and Experience

The NHS lacks a large, dedicated education area. A 2nd floor multi-purpose room is used for most educational programs. In the multi-purpose room, the educational programs must compete with exhibits, visitors, other program functions, and meetings. The configuration of the multi-purpose room is awkward for certain uses due to the adjacent stair enclosure jutting into the space. Sharing common spaces for education and exhibits in this room limits both the type of exhibits that can be installed and visitor access to these exhibits while educational groups are in session.

The NHS receives all visitors, including large groups, at the north entrance of the Wilcox House. After passing through a small enclosure, visitors arrive at a reception area, where they are greeted and their fees are collected. The admissions area is confined and narrow, with insufficient interior waiting space. The adjacent staff space to support admissions is also cramped and uncomfortable for more than one person. The computer, security system, and paperwork are all in full view of visitors during their first moments in the Wilcox House.

The Foundation operates a gift shop that is located on the 2nd floor of the Wilcox House. The shop space is divided into two rooms, with one staff person presiding over its operation when visitors are shopping. The location of the gift shop is remote to the admissions and visitor entry/exit. Ideally, these functions should be adjacent to improve efficiency.

Universal Access

Universal access to the Wilcox House is provided at the east side, or rear, of the structure. One means of access is via a lift to the basement level; the other is via a portable ramp to the 1st floor, which is available on demand. Both means of access are marginal. The lift is constantly in need of repair, is awkward to use, and at present is non-functional. The portable ramp is inconvenient and awkward, as well, and doesn't work for many wheelchairs and scooters. The only accessible restrooms in the Wilcox House are located on the basement level (which, at present, is not accessible). The 2nd and 3rd floors are not wheelchair accessible.

Modern Intrusion on Historic Property

In 1901, the neighborhood surrounding the Ansley Wilcox House was composed of stately mansions set back nearly 200 feet from Delaware Avenue by manicured lawns with mature specimen trees. Today, many of the Victorian homes have been lost to modern, commercial structures, dramatically changing the scale and character of the neighborhood.

The southwest corner of the historic Wilcox property is outside of the NHS boundary. In 1901, the Rumsey holdings (Dexter Rumsey was Ansley Wilcox's father-in-law and held title to the property throughout the Wilcox tenure) included the lands on which the adjacent bank now stands along with a portion of the lands now encumbered by the "floating" easement. Those lands were part of the Wilcox landscaped grounds. When the NHS was established, the southwestern corner of the property was excluded from the lands that were transferred to the federal government.

The modern glass-and-concrete bank building was completed in the 1960s. Unlike Delaware Avenue's Victorian homes, it is sited very close to the avenue. Moreover, the modern structure stands less than 15 feet from the south side of the Wilcox House. Due to its proximity to Delaware Avenue and to the Wilcox House, this structure dominates the historic setting of the Wilcox House and compromises the site's cultural landscape. The modern structure limits the ability of site managers to present and interpret the cultural landscape of the Wilcox property in its entirety. The proximity of the structure compromises views from inside the Wilcox House, as well. Site staff must routinely close the curtains on the south wall of the house to block views to the modern structure.

For the visitor unfamiliar with Buffalo, the site's lack of visibility makes finding one's way to the NHS difficult. The modern bank structure blocks the view of the Wilcox House for those traveling north on Delaware Avenue. When driving north, by the time you can see the Wilcox House, you have driven past it. The modern structure to the north of the NHS blocks views to the Wilcox House, as well, for those traveling south on Delaware Avenue. This structure is set back further from Delaware Avenue than the bank building, so the visibility from the north is better than from the south. The lands on which this structure stands were never part of the historic Wilcox property, although they were part of the Pointsett Barracks.

Impact Topics Included in This Document

As required for an Environmental Assessment, the following section of the document identifies topics that have been selected for impact analysis in the "Environmental Consequences" section. An explanation of which impact topics were dismissed from further analysis is also included. Specific impact topics were identified to allow comparison of the environmental consequences of each alternative. The planning team identified the impact topics based on federal laws, regulations, Executive Orders, and the 2001 *Management Policies*. Below is an overview of the rationale for selecting each impact topic.

Archeological Resources

This topic was carried forward for analysis because alternatives D, E, and F call for new construction on the National Historic Site, and therefore have the potential to affect archeological resources.

Collections

This topic was carried forward for analysis because one of the planning issues identified in this Amendment is to improve facilities for the collection. Thus, beneficial impacts to the collection are anticipated.

Cultural Landscape

This topic was carried forward for analysis because alternatives D, E, and F call for new construction on the National Historic Site and therefore have the potential to impact the cultural landscape associated with the Wilcox House.

Historic Structure

This topic was carried forward for analysis because all action alternatives propose to reconfigure the Wilcox House to some extent, and alternatives D and E propose to construct an addition to the historic structure. Therefore, all action alternatives have the potential to impact historic fabric.

Operations

This topic was carried forward for analysis because the alternatives suggest ways to improve administrative and maintenance functions and thus have the potential to impact site operations. Safety issues were included in this impact topic.

Universal Access

This topic was carried forward for analysis because all action alternatives propose some improvements to site accessibility.

Visitor Use and Experience

This topic was carried forward for analysis because all action alternatives propose some improvements to the admissions area, exhibit areas, or other site elements, which would improve the visitor experience.

Impact Topics Dismissed from Further Analysis

The topics listed below would either not be affected or would be affected negligibly by the alternatives. The rationale for dismissing these topics from further consideration is summarized below.

Topography and Geology

The NHS is located within the Erie-Ontario Lake Plain physiographic province. This province is a product of Pleistocene glaciation, and glacial deposits are found in undisturbed areas. The local landscape consists of a nearly level post-glacial lake plain. The site is level, with an elevation of 660 feet above mean sea level.

None of the actions proposed in the alternatives would change the overall topography or geology in or near the site. Therefore, "Topography and Geology" was dismissed as an impact topic.

Soils

The dominant soil association in the City of Buffalo is Urban Land (Ud). It is found in nearly level urbanized areas and areas of well-drained to poorly drained soils and disturbed soil; on lowland plains, like the Erie-Ontario Lake Plain province. Very little of the original soils remain. Most areas are heavily developed residential blocks, commercial and industrial complexes, streets, and parking lots where 80% or more of land is covered by structures, asphalt, or concrete.

None of the actions proposed in the alternatives would impact the soil characteristics. Therefore, "Soils" was dismissed as an impact topic.

Water Resources

No water bodies, wetlands, or other naturally occurring water sources are located within the moderately urbanized project area. The nearest water body is the Niagara River, located about one mile west of the site. According to FEMA, the Federal Emergency Management Agency, the site is not located within the 100-year floodplain. All surface runoff, including downspouts from roofs, drains into catch-basins connected to the city's wastewater system.

None of the actions proposed in the alternatives would impact water quality. Therefore, “Water Resources” was dismissed as an impact topic.

Air Quality

The Clean Air Act (42 USC 7401 et seq.) requires federal land managers to protect air quality, and National Park Service Management Policies address the need to analyze air quality during park planning. States are responsible for the attainment and maintenance of national ambient air quality standards developed by the Environmental Protection Agency. These standards have been established for several pollutants: inhalable particulate matter, sulfur dioxide, nitrogen oxides, ozone, carbon monoxide, and lead. Elevated concentration of these pollutants can have adverse impacts on park resources, visitors, and staff.

Three air quality categories are established for the national park system areas: Class I, Class II, and Class III. Theodore Roosevelt National Historic Site is designated a Class II area, meaning that the state may permit a moderate amount of new air pollution as long as neither ambient air quality standards, nor the maximum allowable increases over established baseline concentrations are exceeded.

Results from a 2000 study showed ground-level ozone in western New York's air remains well below national standards. Particulate pollution in western New York rose slightly from prior years to a level equivalent to the New York State average, but remains in compliance with air quality standards. Cross-border movements of pollutants are becoming more significant factors in air quality for both the U.S. and the Canadian portions of the Buffalo-Niagara region. Air quality in the area is considered fair (Air Quality Index 3.7). Ozone is the major pollutant facing the city.

The primary source of air pollution associated with the site is vehicle emissions. However, the primary sources of regional air pollution are outside the site, and include stationary sources in the surrounding counties, motor vehicle use in the region, and other upwind sources.

Any construction related to the actions proposed in the alternatives would have negligible impacts to air quality due to vehicle and construction equipment emissions and fugitive dust during construction. Once construction activities were complete, these impacts would cease. None of the action alternatives are expected to significantly increase site visitation, or vehicular access to the site. Therefore, “Air Quality” was dismissed as an impact topic.

Vegetation and Wildlife

Prior to European settlement, the original forest cover consisted of a Northern Hardwoods forest. On the lake plain, this forest type was dominated by beech and maple trees. Lesser amounts of oak, chestnut, pine, and other species occupied drier areas, such as along the Onondaga Escarpment. Presently, the vegetation is primarily determined by land use. The vegetation on the site is typical of the greater residential areas, with little naturally occurring vegetation. The site vegetation is characterized by a manicured lawn, some large mature shade trees, along with a scattering of lilacs and other ornamental shrubs that lend a park-like appearance. The trees, shrubs, and ground cover at the site were either planted or are descendants of planted materials, and are therefore considered in the “Cultural Landscape” section of the document.

Given the size and urbanized nature of the site, no wildlife inventory has been conducted. The area is habitat for typical urban wildlife including squirrels, sparrows, starlings, and field mice. None of the actions proposed in the alternatives would have detectable impacts on wildlife. Therefore, “Wildlife” was dismissed as an impact topic.

Rare, Threatened, Endangered, Candidate Species and Species of Special Concern

The U.S. Fish and Wildlife Service (FWS) and New York State Department of Environmental Conservation (DEC) were contacted to determine whether any known critical habitats or listed rare, threatened, or endangered species had been documented with the project area. Both the U.S. FWS and the New York DEC stated that no Federal- or State listed or proposed endangered or threatened species are known to exist in the project area.

Soundscape Management

The natural ambient soundscape is the aggregate of all natural sounds that occur, together with the physical capacity for transmitting sounds. Natural sounds occur within and beyond the range of sounds that humans can perceive and can be transmitted through air, water, or solid materials. Mandates and policies require that the National Park Service preserve the natural ambient soundscapes, restore degraded soundscapes to the natural ambient condition wherever possible, and protect natural soundscapes from degradation due to human-caused noise. Disruptions from recreational uses are to be managed to provide a high-quality visitor experience in an effort to preserve or restore the natural quiet and natural sounds.

The site's soundscape is typical of a bustling commercial neighborhood, with the majority of noise being generated by automobiles. Delaware Avenue carries abundant traffic. The property adjacent to the site is a bank with a drive-thru service and parking lot, resulting in fairly high numbers of automobiles accessing the adjacent property during business hours.

None of the actions proposed in the alternatives would increase noise levels over the long term. Construction activities would have negligible impacts on noise, which would cease once construction was complete. The contractor would be required to comply with local noise ordinances. Because of the bustling nature of the site's setting, and any increased noise associated with the alternatives would be negligible and short-lived, "Soundscape Management" was dismissed as an impact topic.

Lightscape Management

Natural lightscapes are considered natural resources that exist in the absence of human-caused light. They vary with geographic location and season. The National Park Service management guidelines recognize the roles that light and dark periods play in natural resource processes and the evolution of species. Additionally, night sky and darkness are often important components of the overall visitor experience of a national park. To protect the loss of natural darkness, management policies direct park managers to avoid using artificial light in sensitive habitat areas; seek the cooperation of park visitors, neighbors, and local government agencies to prevent or minimize the intrusion of artificial light into the night scene; and work with surrounding communities to develop local Dark Night Sky ordinances.

Any new construction associated with the alternatives would introduce new artificial lighting to properly illuminate a new building addition or structure in the evening. Given that the site is surrounded by artificial lighting due to its location in a bustling commercial area, the introduction of this additional lighting would not result in a detectable impact on the night sky. Therefore, the impact topic "Lightscape Management" was dismissed as an impact topic.

Ethnographic Resources

The NPS defines ethnographic resources as any "site, structure, landscape, or natural resource feature assigned traditional legendary, religious, subsistence or other significance in the cultural system of a group traditionally associated with it" (Director's Order #28, *Cultural Resource Management Guidelines*, p. 181). Because there are no known ethnographic resources within or in close proximity to the site, "Ethnographic Resources" was dismissed as an impact topic.

Indian Trust Resources

The Department of the Interior Secretarial Order 3175 (Departmental Responsibilities for Indian Trust Resources) requires that any anticipated impacts to Indian Trust Resources from a proposed action by Department of the Interior agencies be explicitly addressed in environmental documents. The Federal Indian Trust responsibility is a legally enforceable fiduciary obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights. It represents a duty to carry out the mandates of federal law with respect to Native American and Alaskan native tribes.

Based upon the professional judgment of the planning team, there are no Indian Trust Resources within the site. The lands are not held in trust by the Secretary of the Interior for the benefit of Native American and Alaskan native tribes. Therefore, the impact topic "Indian Trust Resources" was dismissed from further consideration.

Socio-economic Environment

According to 2000 U.S. Census data, the greater Buffalo metropolitan area, including Niagara Falls, has a total population of 1,170,000, with 84% Caucasian, 12% African American, and 3% Hispanic or Latino. The region is below New York State averages in terms of income and housing values. The median family income is \$49,000 (5% below the New York State average). The median owner-occupied housing value is \$89,100 (40% below New York State average), and the median monthly rent for renter-occupied units is \$510 (25% below New York State average).

The City of Buffalo has a population of 292,648, more diverse than the greater metropolitan area, with 54% Caucasian, 37% African American, and 8% Hispanic or Latino. The city is far short of New York state averages in terms of income and housing values. The median annual family income is \$30,614 (40% below New York State average). The median owner-occupied housing value is \$59,300 (60% below New York State average), and the median monthly rent for renter-occupied units is \$472 (30% below New York State average).

None of the actions proposed in the alternatives are expected to have a measurable impact on the socio-economic environment of the City of Buffalo or Erie County. Any employment opportunities resulting from the action alternatives would be minimal. Therefore, the "Socio-economic Environment" was dismissed as an impact topic.

Environmental Justice

Executive Order 12898: "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" requires federal agencies to consider the impact of their actions on minority and low-income populations and communities, as well as the equity of the distribution of benefits and risks of those actions.

None of the actions proposed in the alternatives would have disproportionate health or environmental effects on minorities or low-income populations or communities as defined in the Environmental Protection Agency's Draft Environmental Justice Guideline (July 1996). Therefore, "Environmental Justice" was dismissed as an impact topic.

Transportation

Buffalo is served by several major airlines, by train, and by interstate bus lines. The city is also the center of a well-developed highway network. Interstate 90 (the New York State Thruway), U.S. Routes 62, 219, and 20, Canada's Queen Elizabeth Way, Ontario Route 3, and New York Routes 5, 16, 264, and 265 all pass through or near the city.

Interstate 90 and Interstate 190 join to the southeast of the city and are connected by the Scajaquada Expressway across the northern part of the city to form an inner beltway. Exits from this inner beltway provide easy access to Delaware Avenue and the Theodore Roosevelt Inaugural NHS. The site is also on an intra-city bus route.

None of the actions proposed in the alternatives would impact transportation through or to the site. Therefore, "Transportation" was dismissed as an impact topic.

Planning Context

This Master Plan Amendment builds on several documents already in force at the NHS, including the original Master Plan, the Theodore Roosevelt Inaugural Site Foundation's Strategic Plan, and the site's Annual Performance Plan. In addition, there are several plans and related programs underway in the Buffalo-Niagara region that relate directly or indirectly to the NHS. These plans and related initiatives are summarized below.

Master Plan

The original Master Plan was approved in 1967. No amendments have been made to date, although additional legislation has been passed affecting the NHS (see Appendix A).

The plan establishes general directions and guides for the development of the Ansley Wilcox House and grounds. It proposes the restoration of the library, morning room, and hallway, the areas of the house most closely associated with the inauguration of Theodore Roosevelt; refurbishing the library; and providing additional space for interpretive displays and devices. It proposes adaptive use of portions of the structure for administration and other purposes. It recommends a program of grounds development to enhance the setting of the house, while providing visitor parking and walks, parking for organizations using adaptive space, and for the access and parking rights leased to the adjacent bank by former owners.

The plan also provides for operation and maintenance of the site. It recognizes the role of the Theodore Roosevelt Inaugural Site Foundation, Inc., as the operating agency, and establishes broadly stated guides for this agency's use in operating, interpreting, and maintaining the site.

Finally, the plan provides a framework upon which to build a close and harmonious relationship between the Foundation and the NPS.

As mentioned previously, the Master Plan offers no guidance on provision of additional interior space.

Theodore Roosevelt Inaugural Site Foundation Strategic Plan: 2003–2006

The Strategic Plan establishes a mission, quantitative and qualitative goals, and the key activities essential to achieving those goals. It evaluates the NHS strengths, weaknesses, opportunities, and challenges, and puts forth a set of core beliefs that influence the direction, thinking, and behaviors of the organization. It also identifies the NHS target audience, strategic goals, and activities planned through December 2006.

The Strategic Plan highlights the Foundation's five strategic goals:

- Increase and diversify the audience base within target segments.
- Create mission-driven programming and exhibits.
- Increase effectiveness of staff, volunteers, and board members while providing them a rewarding and enriching experience.

- Enhance the operational and physical infrastructure to support long-term needs and goals.
- Grow and diversify funding streams to support strategic goals and operational activities.

Annual Performance Plan for Theodore Roosevelt NHS, Fiscal Year 2004

As a unit of the national park system, the Theodore Roosevelt Inaugural NHS is required to complete an annual performance plan. The plan focuses on the annual goals and what site managers plan to accomplish in Fiscal Year 2004. The plan is organized according to the NHS mission goals, which are summarized as follows:

- The Theodore Roosevelt Inaugural NHS is protected, restored, and maintained in good condition.
- Visitors safely enjoy and are satisfied with the availability, accessibility, diversity, and quality of site facilities, services, and appropriate recreational opportunities.
- Site visitors and the general public understand and appreciate the preservation of the park and its resources for this and future generations.
- The site increases its managerial resources through initiatives and support from other agencies, organizations, and individuals.

Buffalo Niagara Cultural Tourism Initiative

The Cultural Tourism Committee, with funding from the John R. Oishei Foundation, commissioned the Institute for Local Governance and Regional Planning at the University of Buffalo to develop a comprehensive plan for cultural tourism development. The planning process included an inventory of tourism assets and opportunities, a market analysis of current and potential cultural tourism, regional priorities for development, and implementation strategies rooted in strong stakeholder participation. A final blueprint for implementation is under development.

City of Buffalo Comprehensive Plan

The City of Buffalo published a draft Comprehensive Plan in June 2003. The plan sets forth a broad vision for Buffalo and projects conditions into the year 2025. The goal of the plan is to transform Buffalo as the urban center of the Buffalo-Niagara region through a process of managed change, integrating economic, social, and environmental considerations, and restoring economic well-being, environmental health, and population to the City. The Comprehensive Plan outlines several goals and related objectives, including:

- Fixing the basics: maintaining infrastructure and delivering quality municipal services.
- Building on assets: transforming the economy, reconstructing schools, implementing a community preservation plan, and rebuilding neighborhoods.

Delaware Avenue Historic District

The NHS lies just outside the boundary of the Delaware Avenue Historic District. The district encompasses the west side of Delaware Avenue for two blocks between North and Bryant Streets. The district is largely composed of the once private homes of wealthy Buffalo families. These structures are now occupied by educational, religious, cultural, and civic organizations. The district is significant as an important section of the most affluent residential area of the City during the period from the latter part of the 19th century through the Depression. The work of such important architects as Stanford White, Edward Green, and Charles Pierrepont H. Gilbert are represented here.

Erie Canalway National Heritage Corridor

In December 2000, Congress established the Erie Canalway National Heritage Corridor as the nation's 23rd national heritage corridor. It encompasses 524 miles of the New York State Canal System, which includes the Erie, Cayuga and Seneca, Oswego and Champlain canals, the historic alignments of the canals, plus the cities of Albany and Buffalo. Theodore Roosevelt Inaugural NHS is located within the boundary of the Erie Canalway. A preservation and management plan for the Erie Canalway commenced in 2003 and will be made available for public review by the end of Fiscal Year 2005.

Western Erie Canal Heritage Corridor

The Western Erie Canal Heritage Corridor is part of the New York State's system of heritage areas coordinated by New York State's Office of Parks, Recreation and Historic Preservation. The corridor commission was created by the New York State Legislature in 1999 to address resources in Erie, Monroe, Niagara, Orleans, and Wayne counties. The 18-member planning commission was established to develop a management plan that will guide the formal establishment of the heritage corridor. Establishment will be considered following approval of the plan. This heritage corridor overlaps with the Erie Canalway National Heritage Corridor both geographically and thematically, and includes the NHS. Both corridor commissions have taken steps to ensure communication and coordination of efforts.

Part Two: Alternatives

This section outlines a range of alternatives that would provide for the safe and efficient use of the facility and support the goals and mission of the NHS. The team developed these alternatives at an on-site workshop held in November 2004.

Prior to describing the alternatives, the following section outlines the laws, policies, and mandates applicable to Theodore Roosevelt Inaugural National Historic Site, regardless of which alternative is implemented.

Applicable Laws, Policies, and Mandates

As a unit of the national park system, the management of Theodore Roosevelt Inaugural NHS is guided by the 1916 Organic Act (which created the National Park Service); the General Authorities Act of 1970; the act of March 27, 1978, relating to the management of the national park system; other applicable federal laws and regulations, such as the National Historic Preservation Act; and the NHS enabling legislation and 1980 amendment (see Appendix A).

Actions are also guided by the National Park Service Management Policies. This planning effort is guided by Director's Order #2: *Park Planning* and by Director's Order #12: *Conservation Planning, Environmental Impact Analysis, and Decision Making*.

The applicable laws, regulations, and policies most pertinent to planning are described below. Theodore Roosevelt Inaugural NHS must be managed in accordance with these laws and policies regardless of which alternative is chosen as the final plan.

Archeological Resources

Laws and policies in effect for the protection of archeological resources include National Park Service Management Policies, The National Historic Preservation Act, Executive Order 11593: "Archeological Resources Protection Act," and the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. The laws and policies require that archeological sites be identified and inventoried and their significance determined and documented. Archeological sites are to be protected in an undisturbed condition unless it is determined through formal processes that disturbance or natural deterioration is unavoidable. When disturbance or deterioration is unavoidable, the site is to be professionally documented and salvaged in consultation with the State Historic Preservation Officer and American Indian tribes.

Environmental Compliance

Congress enacted the National Environmental Policy Act in 1969 to "declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality." This act requires federal agencies to: utilize an interdisciplinary approach to planning, consider a range of alternatives in planning, and evaluate the environmental impacts of proposed actions.

Historic Resources

Numerous laws and policies are in effect for the protection of historic resources, including the National Historic Preservation Act, the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, and the Secretary of the Interior's Standards for the Treatment of Historic Properties. The laws and policies require that historic resources be inventoried and their significance and integrity evaluated under National Register of Historic Places criteria. The qualities that contribute to the listing or eligibility for listing on the National Register are to be protected in accordance with the Secretary of the Interior's Standards, unless it is determined through a formal process that disturbance or natural deterioration is unavoidable.

Universal Accessibility

Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 791), and federal guidelines published in accordance with Americans with Disabilities Act of 1990 define specific access requirements for persons with disabilities to parking facilities, pathways, and buildings. The accessibility requirements apply to government facilities (Title II) and to private entities that provide public accommodations (Title III). Accordingly, NHS managers are to strive to ensure that disabled persons are afforded experiences and opportunities with other visitors to the greatest extent practicable. Special, separate, or alternative facilities, programs, or services are to be provided only when existing ones cannot reasonably be made accessible.

Sustainable Design/Development

Sustainability can be described as the result achieved by managing national parks in ways that do not compromise the environment or its capacity to provide for future generations. Federal laws, executive orders, and executive memoranda, including Executive Order 13123: "Greening the Government through Efficient Energy Management," Executive Order 13101: "Greening the Government through Waste Prevention, Recycling, and Federal Acquisition," and the National Park Service Guiding Principles of Sustainable Design, require park managers to reduce impacts of federal government activities on the environment. The NPS strives to reduce energy costs, eliminate waste, and conserve energy resources by using energy-efficient and cost-effective technology and incorporate energy efficiency into the decision-making process during the design and acquisition of buildings, facilities, and transportation systems.

Alternative A: No Action

Under this alternative, as the name suggests, there would be no changes made to the NHS. This alternative is presented as a basis by which to compare the other alternatives. The National Environmental Policy Act requires consideration of a “no action” alternative as part of the environmental assessment.

Safety Concerns

Under this alternative, the administrative offices on 3rd floor would remain as at present, with one means of egress available in case of an emergency. Program spaces on the 2nd floor and the basement would continue to have limited means of emergency egress. The Wilcox House would remain at risk of fire damage. The electrical system would continue to be insufficient.

Collections Management

Under this alternative, the HVAC systems would remain as is, and continue to provide uneven conditions. The present curatorial storage facilities would remain. The curatorial storage spaces would continue to be insufficient and cramped, with sub-standard environmental and security controls. Portions of the collection would remain in the basement, which is inconsistent with NPS policies for curatorial storage.

Operations

Under this alternative, administrative spaces would continue to be interspersed with public spaces, with no central administrative storage space provided. Fund-raising opportunities would continue to be constrained by limited appropriate space and the lack of nearby accessible restrooms. Maintenance areas would remain as at present, with insufficient workspace and storage space. Storage for educational programs would continue to be distributed in several spaces throughout the 2nd floor.

Visitor Use and Experience

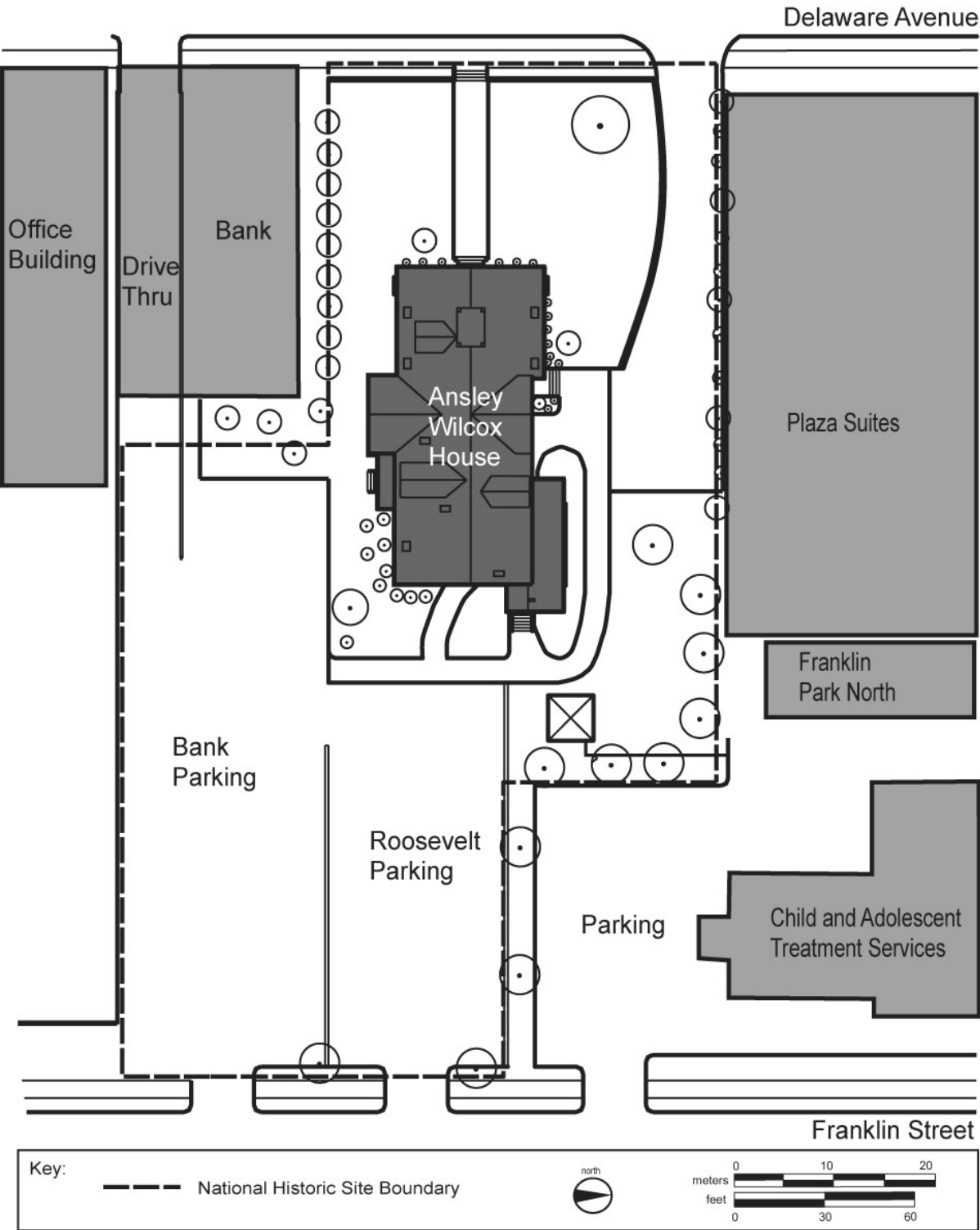
Under this alternative, the 2nd floor multi-purpose room would continue to serve as the only available, large educational space. The exhibit gallery would remain in the multi-purpose space, thereby limiting visitor access to the exhibits when programs or meetings were in session.

Under this alternative, the admissions area would remain in its current configuration, with insufficient space to support the arrival of groups. The gift shop would remain in two spaces on the 2nd floor, remote from the visitor admissions area.

Universal Access

Under this alternative, people in wheelchairs would continue to use a portable ramp to gain access to the Wilcox House. Alternately, should the lift become functional, they could use the lift in the rear entrance to access the basement. Those in wheelchairs would only be able to access restrooms when the lift was functional. The multi-purpose room as well as offices on the 2nd or 3rd floors would remain inaccessible.

Figure 4: Alternative A: No Action



Alternative B: Reconfigure Existing Structure

This alternative seeks to remedy the most pressing planning issues facing the NHS within existing available space. It is a “minimal action” alternative that is based on recommendations made in a 1999 report by the architecture firm, Bargmann, Hendrie + Archetype, Inc. This alternative largely follows proposals outlined in the report.

Safety Concerns

Under this alternative, the NHS would act to protect the Wilcox House from risk posed by fire and electrical system overload. Site managers would install a fire suppression system and upgrade the electrical system.

As in Alternative A, the administrative offices on 3rd floor would remain and would continue to have only one means of emergency egress.

Collections Management

Under this alternative, site managers would upgrade the HVAC systems, which would improve environmental conditions for the site’s collection. Site managers would secure all collection storage areas. Some of the collection would remain stored in the basement, which is inconsistent with NPS policies for curatorial storage.

Operations

Under this alternative, site managers would relocate educational offices from the 1st floor to the 2nd floor to limit interruption in the orientation room.

As in Alternative A, the NHS would continue to lack central administrative storage space, fund-raising opportunities would continue to be constrained by limited appropriate space.

As in Alternative A, the maintenance area would remain as at present, and storage for educational programs would continue to be distributed in several spaces throughout the Wilcox House.

Visitor Use and Experience

As in Alternative A, the 2nd floor multi-purpose room would continue to serve as the only available, large educational space. The exhibit gallery would remain in the multi-purpose space, thereby limiting visitor access to the exhibits when programs or meetings were in session.

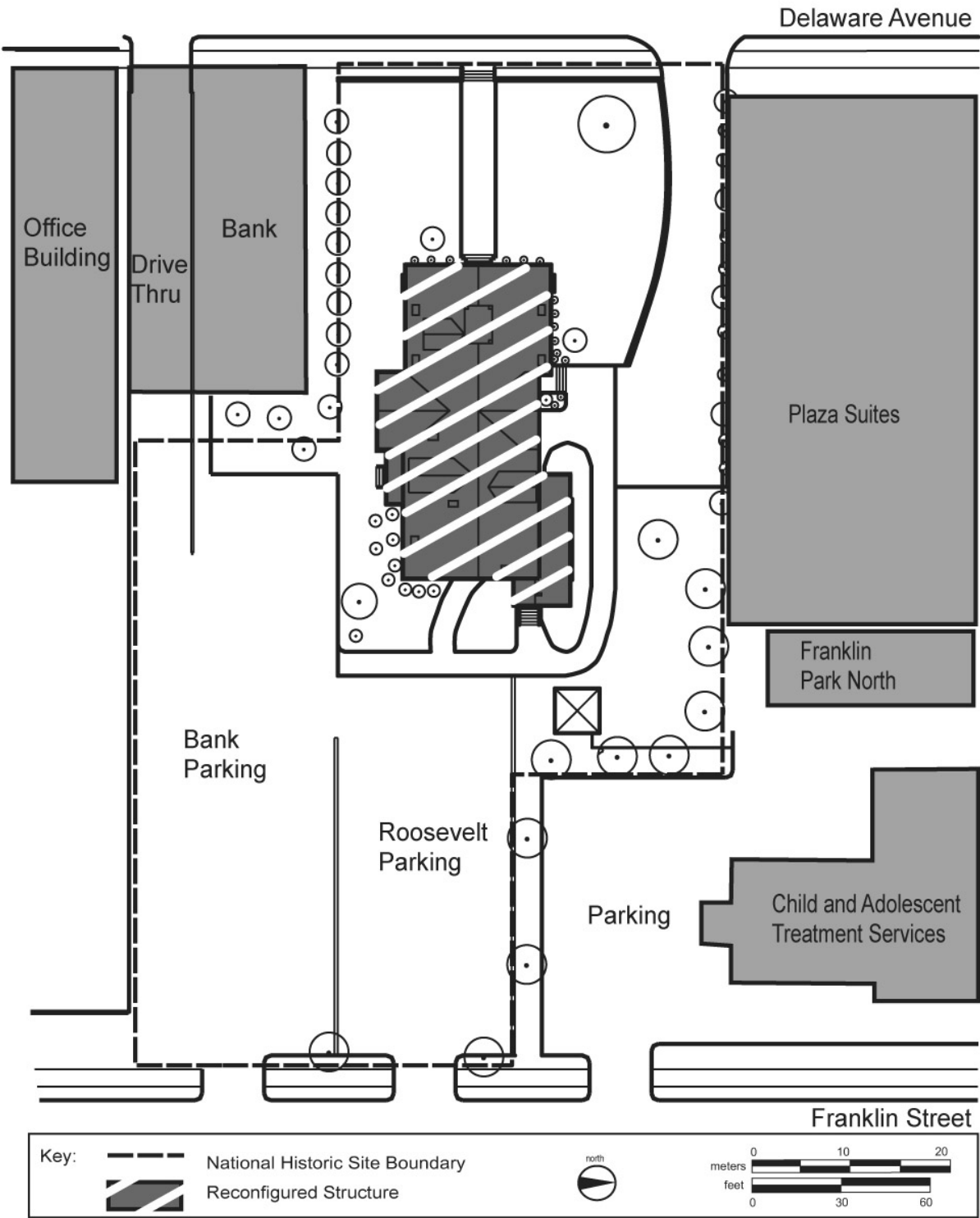
Under this alternative, site managers would install a central desk in the admissions area to help facilitate visitor flow in the small space.

Site managers would relocate the gift shop from the 2nd floor to the exhibit area so that it is directly adjacent to the visitor admissions area.

Universal Access

To facilitate universal access, site managers would construct a new ramp to 1st floor east entrance to Wilcox House and remove the non-functional lift. In addition, site managers would install an elevator in the “infill” area to provide wheelchair access to the basement, the 1st floor, and the 2nd floor. Site managers would also reconfigure the restrooms on the 1st floor to make them accessible.

Figure 5
Alternative B: Reconfigure Existing Structure



Alternative C: Acquire or Lease Off-site Facility

Under this alternative, site managers would acquire or lease an existing building outside of the boundary of the NHS to provide for the approximately 4,500 square feet of interior space that is needed at the site. The existing structure would be refurbished for administrative and curatorial purposes. Appropriate locations for an off-site facility would be to the north of the Wilcox House or to the east across Franklin Street.

Under this alternative, a boundary adjustment would be required if the NPS were to own and operate the off-site facility. A legislative boundary adjustment would not be required if the Foundation were to own and operate the facility.

Safety Concerns

Under this alternative, the NHS would act to protect the NHS from risk posed by fire and electrical system overload. Site managers would install a fire suppression system and upgrade the electrical system in both the Wilcox House and the rehabilitated off-site facility.

Administrative offices would be removed from 3rd floor and relocated to the off-site facility, thereby obviating the need for a second means of egress from the 3rd floor.

Collections Management

Under this alternative, site managers would upgrade the HVAC systems in the Wilcox House and provide adequate HVAC systems in the off-site facility. This would improve environmental conditions for the site's collection. Site managers would also secure all collection storage areas. Dedicated curatorial storage space would be provided in the off-site facility for archives, and permanent and temporary collections.

Operations

Under this alternative, the majority of the offices would be relocated to the off-site facility. This would largely centralize administrative functions and would limit interruption in interpretive spaces. Nearby meeting rooms and centralized administrative storage would be provided in the off-site facility. An office and meeting area would be retained in the Wilcox House to support interpretive functions. The maintenance area would be expanded in the Wilcox House into spaces currently occupied by curatorial functions. However, fund-raising opportunities continue to be constrained by limited appropriate space. Dedicated educational storage areas would be provided near educational programming spaces.

Visitor Use and Experience

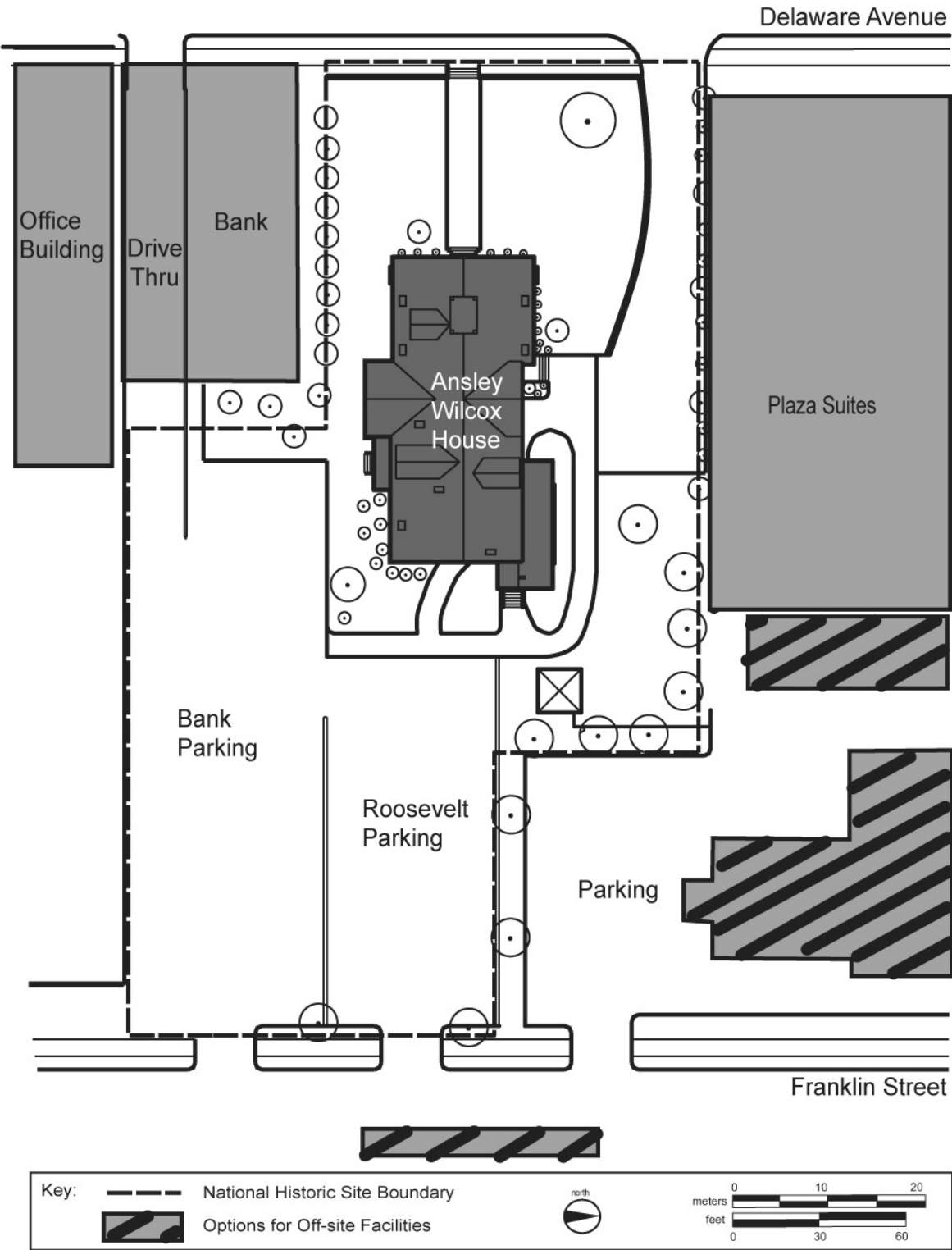
Under this alternative, the 2nd floor multi-purpose room would be devoted entirely for educational programming, as the exhibits would be removed to other locations in the Wilcox House.

As in Alternative B, site managers would install a central desk in the admissions area to help facilitate visitor flow in the small space. Also as in Alternative B, site managers would relocate the gift shop from the 2nd floor to the exhibit area so that it is directly adjacent to the visitor admissions area.

Universal Access

As in Alternative B, to facilitate universal access, site managers would construct a new ramp to the east entrance of the house and remove the lift. Site managers would install an elevator in the "infill" area to provide wheelchair access to the basement, 1st floor, and 2nd floor. Site managers would also reconfigure the restrooms on the 1st floor to make them accessible. Additionally, site managers would provide elevator access in the rehabilitated facility to support curatorial storage and administrative functions.

Figure 6: Alternative C: Acquire or Lease Off-site Facility



Alternative D: Construct New Addition on Site of Former Carriage House (Preferred Alternative)

Under this alternative, site managers would construct a new addition on the site of the former carriage house to provide for the approximately 4,500 square feet of interior space that is needed at the site. The addition would be connected to the “infill area” of the Wilcox House. It would be of similar massing and scale to the historic carriage house, but not an exact replica. Consistent with the Secretary of the Interior’s *Standards for the Treatment of Historic Properties*, the façades of the new addition would be compatible with the historic structure, but be of obviously modern construction.

Safety Concerns

As in Alternative B, the NHS would act to protect the Wilcox House from risk posed by fire and electrical system overload. Site managers would install a fire suppression system and upgrade the electrical system. These systems would serve the Wilcox House and the new addition.

Administrative offices would be removed from 3rd floor, thereby obviating the need for a second means of egress from the 3rd floor.

Collections Management

Under this alternative, site managers would upgrade the HVAC systems to serve the Wilcox House and addition. This would improve environmental conditions for the site’s collection. Site managers would also secure all collection storage areas. Site managers would provide dedicated curatorial storage space and short-term research space in the Wilcox House and new addition.

Operations

Under this alternative, site managers would relocate the majority of offices to the 2nd floor of the Wilcox House. This would centralize the site’s administrative function and limit interruption in interpretive spaces. A nearby meeting room and work area would be provided. A central administrative storage space would be provided near the offices in the Wilcox House. Additional space for maintenance would be provided in the existing structure or the new addition. Dedicated educational storage areas would be provided in the new addition near educational programming space.

Under this alternative, fund-raising opportunities would be expanded by the availability of appropriately configured accessible space with nearby restrooms located in the new addition.

Visitor Use and Experience

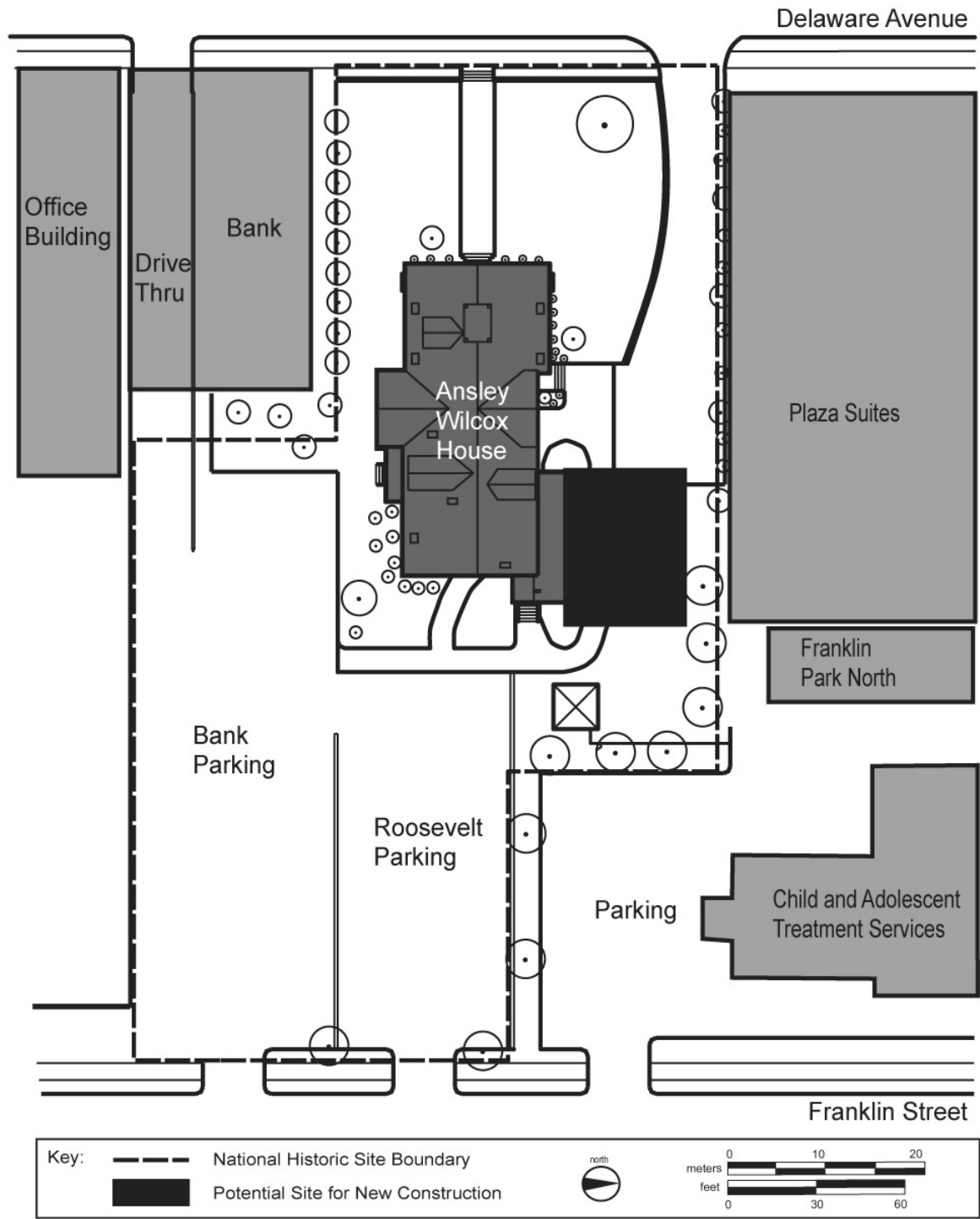
Under this alternative, site managers would provide a large, dedicated educational space in the new addition. The exhibit gallery in the 2nd floor multi-purpose room would be relocated to the current admissions area and gift shop.

Under this alternative, the primary visitor entrance would be located on the south side of the new addition. In the new space, site managers would provide a sufficiently sized admissions area, with suitable workspace and storage. A single space for the gift shop would be located directly adjacent to the admissions area.

Universal Access

Under this alternative, universal access would be provided at the primary visitor entry. An elevator, located in the new addition, would provide wheelchair access to basement, 1st, and 2nd floors. Restrooms on the 1st floor would be made accessible.

Figure 7:
Alternative D: Construct New Addition on Site of Former Carriage House
(Preferred Alternative)



Alternative E: Construct New Addition on East Side of Historic Structure

Under this alternative, site managers would construct a new addition to the Wilcox House to provide for the approximately 4,500 square feet of interior space that is needed at the site. The addition would be connected to the east façade of the house, protruding toward the parking area. The new addition would be of similar materials and detailing to the Wilcox House, but be of obviously modern construction.

Safety Concerns

As in Alternative D, the NHS would act to protect the Wilcox House from risk posed by fire and electrical system overload. Site managers would install a fire suppression system and upgrade the electrical system. These systems would serve the Wilcox House and the new addition.

Administrative offices would be removed from 3rd floor, thereby obviating the need for a second means of egress from the 3rd floor.

Collections Management

As in Alternative D, site managers would upgrade the HVAC systems to serve the Wilcox House and addition. This would improve environmental conditions for the site's collection. Site managers would also secure all collection storage areas. Site managers would provide dedicated curatorial storage space, with short-term research space in the Wilcox House and new addition.

Operations

As in Alternative D, site managers would relocate the majority of offices to the 2nd floor of the Wilcox House. A central administrative storage space would be provided near the administrative offices. This would centralize the site's administrative function and limit interruption in interpretive spaces. A nearby meeting room and work area would be provided.

Under this alternative, fund-raising opportunities would be expanded by the availability of appropriately configured accessible space with nearby restrooms located in the new addition. Additional space for maintenance would be provided in the existing structure or the new addition. Dedicated educational storage areas would be provided in the new addition near educational programming space.

Visitor Use and Experience

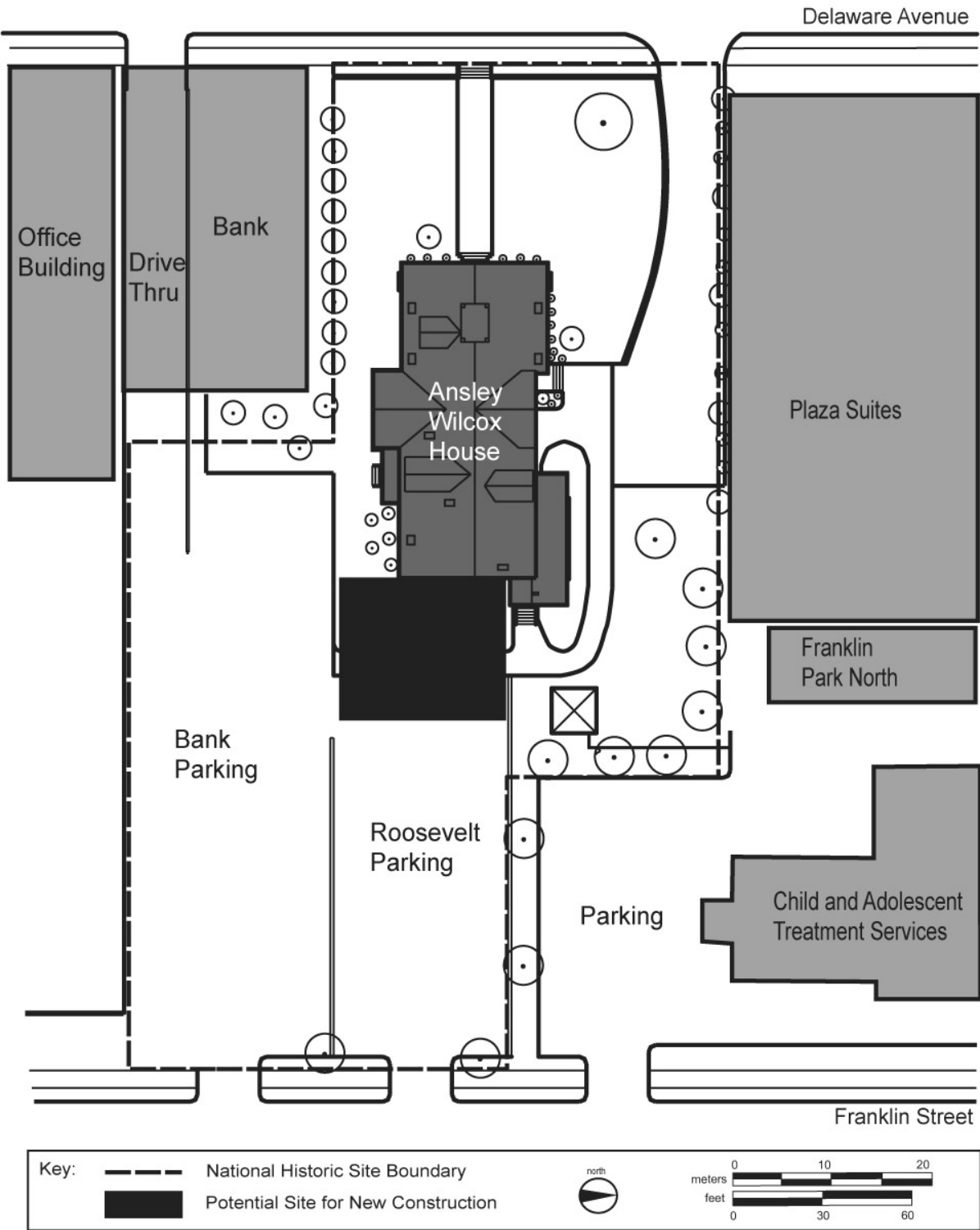
As in Alternative D, site managers would provide a large, dedicated educational space in the new addition. The exhibit gallery in the 2nd floor multi-purpose room would be relocated to the current admissions area and gift shop.

Under this alternative, the primary visitor entrance would be located on the east side of the new addition to the House. In the new space, site managers would provide a sufficiently sized admissions area, with suitable workspace and storage. A single space for the gift shop would be located directly adjacent to the admissions area.

Universal Access

As in Alternative D, universal access would be provided at the primary visitor entry. An elevator, located in the new addition, would provide wheelchair access to basement, 1st, and 2nd floors. Restrooms on the 1st floor would be made accessible.

Figure 8:
Alternative E: Construct New Addition on East Side of Historic Structure



Alternative F: Construct New Facility on Non-Historic Portion of NHS

Under this alternative, site managers would construct a new, stand-alone structure on property within the NHS, but outside of the 1901 property line. The new structure would provide for the approximately 4,500 square feet of interior space that is needed at the site. The new structure would provide space for visitor services, which would free up space in the Wilcox House for administrative and curatorial functions. Under this alternative, no boundary adjustment would be required.

Safety Concerns

Under this alternative, the NHS would act to protect the NHS from risk posed by fire and electrical system overload. Site managers would install a fire suppression system and upgrade the electrical system in the Wilcox House. In addition, fire suppression, site security and surveillance, and electrical systems would be provided in the new facility. Administrative offices would be removed from 3rd floor of the Wilcox House, thereby obviating the need for a second means of egress from the 3rd floor.

Collections Management

Under this alternative, site managers would upgrade the HVAC systems in the Wilcox House. This would improve environmental conditions for the site's collection. Site managers would also secure all collection storage areas. Site managers would provide dedicated curatorial storage space, with short-term research space in the Wilcox House.

Operations

As in Alternative D, site managers would relocate the majority of offices to the 2nd floor of the Wilcox House. This would centralize the site's administrative function and limit interruption in interpretive spaces. A central administrative storage space would be provided near the administrative offices in the Wilcox House. A nearby meeting room and work area would be provided. Additional space for maintenance would be provided in the existing structure or the new facility. Fund-raising opportunities would be expanded by the availability of appropriately configured accessible space with nearby restrooms. Dedicated educational storage areas would be provided in the new facility near the educational programming space.

Visitor Use and Experience

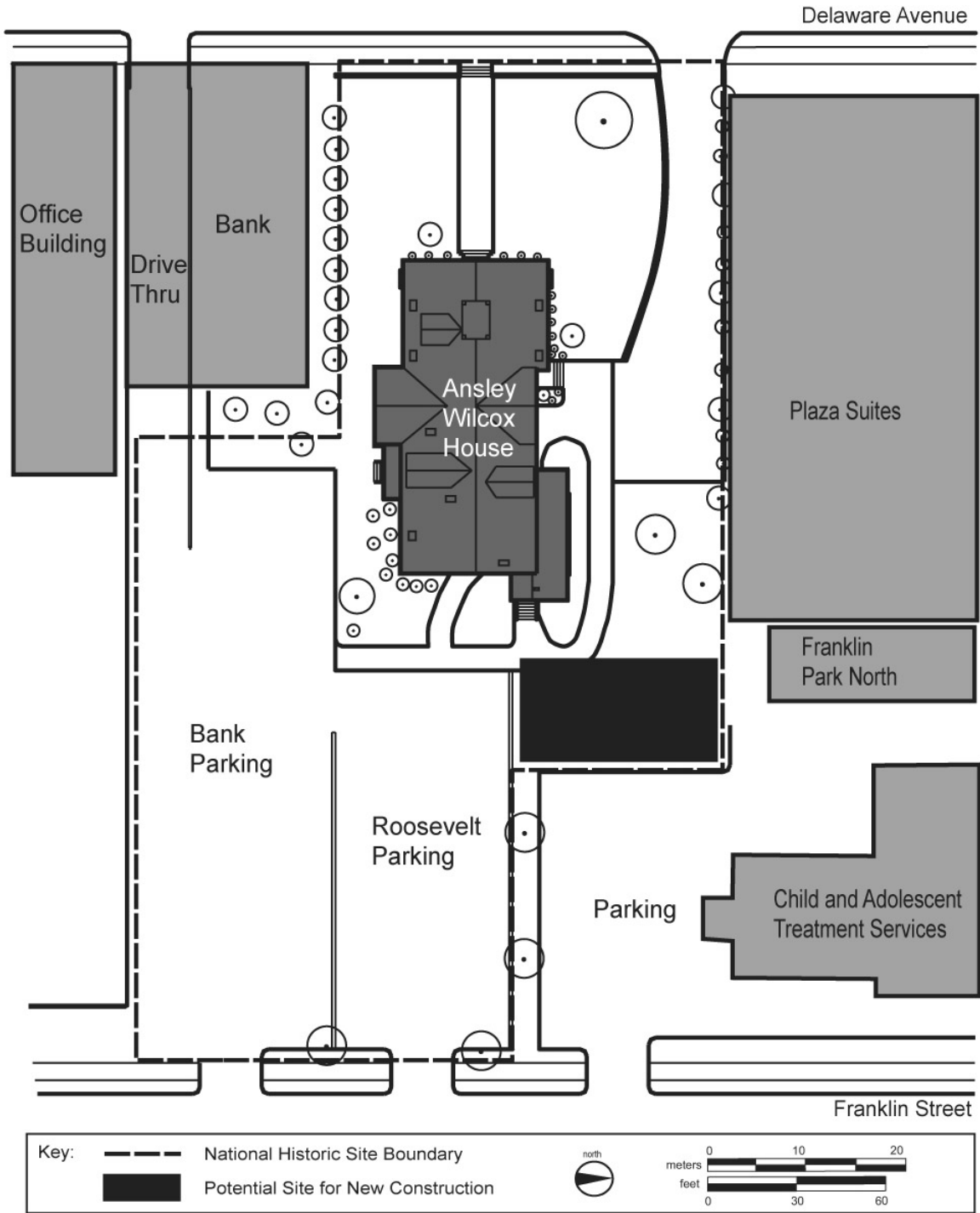
Site managers would provide a large, dedicated educational space in the new facility. The exhibit gallery in the 2nd floor multi-purpose room would be relocated to the current admissions area and gift shop.

Under this alternative, visitors to the NHS would enter the new facility for initial contact and admissions. Then visitors would proceed to the Wilcox House via its present primary entrance. In the new facility, site managers would provide a sufficiently sized admissions area, with suitable workspace and storage. A single space for the gift shop would be located directly adjacent to the admissions area.

Universal Access

Under this alternative, universal access would be provided at the primary visitor entry to the new facility. Site managers would install an elevator in the new facility to support visitor services. To facilitate universal access to the Wilcox House, site managers would construct a ramp leading to the 1st floor east entrance of the Wilcox House and remove the non-functional lift. In addition, site managers would install an elevator in the "infill" area to provide wheelchair access to the basement, the 1st floor, and the 2nd floor. Site managers would also reconfigure the restrooms on the 1st floor to make them accessible.

Figure 9:
Alternative F: Construct New Facility on Non-Historic Portion of NHS



Elements Common to All Action Alternatives

Under all action alternatives, an historic structures report would be updated for the Ansley Wilcox House prior to initiating construction activities. This would allow site managers to be as sensitive as possible to the historic values of the structure when making any modifications.

Under all action alternatives, site utilities would be put underground. This would remedy the unsightly views of the utility pole with its haphazard collection of wires that stands at the entry to the NHS.

Summary of Alternatives

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non- Historic Portion of NHS
SAFETY CONCERNS					
No fire suppression system provided.	Install fire suppression system.	Install fire suppression system in Wilcox House and off-site facility.	Install fire suppression system.	Install fire suppression system.	Install fire suppression system in Wilcox House and new facility.
Electrical systems remain as at present.	Upgrade electrical system.	Upgrade electrical system in Wilcox House and in rehabilitated facility.	Upgrade electrical system.	Upgrade electrical system.	Upgrade electrical system.
Administrative offices remain on 3 rd floor.	Administrative offices remain on 3 rd floor.	Administrative offices removed from 3 rd floor.	Administrative offices removed from 3 rd floor.	Administrative offices removed from 3 rd floor.	Administrative offices removed from 3 rd floor.
COLLECTIONS MANAGEMENT					
Environmental conditions remain as at present.	Upgrade HVAC system.	Upgrade HVAC system in Wilcox House and in rehabilitated facility.	Upgrade HVAC system.	Upgrade HVAC system.	Upgrade HVAC system; provide adequate HVAC system in new facility.
Storage areas remain un-secured.	Secure storage areas in basement and on 3 rd floor.	Secure storage areas in Wilcox House and off-site facility.	Secure storage areas in Wilcox House.	Secure storage areas in Wilcox House.	Secure storage areas in Wilcox House.
		Provide dedicated collection	Provide dedicated collection	Provide dedicated collection	Provide dedicated collection

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non- Historic Portion of NHS
		storage space in rehabilitated facility.	storage space in Wilcox House and new addition.	storage space in Wilcox House and new addition.	storage space in Wilcox House.
OPERATIONS					
Administrative spaces remain as at present.	Relocate educational offices from 1 st to 2 nd floor.	Relocate majority of offices to off-site facility; provide nearby meeting room and work area.	Relocate majority of offices to the 2 nd floor; provide nearby meeting room and work area.	Relocate majority of offices to the 2 nd floor; provide nearby meeting room and work area.	Relocate majority of offices to the 2 nd floor; provide nearby meeting room and work area.
No central administrative storage space exists.	No central administrative storage space exists.	Provide central administrative storage space in off-site facility.	Provide central administrative storage space.	Provide central administrative storage space.	Provide central administrative storage space.
Fund-raising opportunities remain as at present.	Fund-raising opportunities remain as at present.	Fund-raising opportunities remain as at present.	Fund-raising opportunities expanded.	Fund-raising opportunities expanded.	Fund-raising opportunities expanded.
Maintenance area remains as at present.	Maintenance area remains as at present.	Provide additional space for maintenance function in existing structure and new facility.	Provide additional space for maintenance function in existing structure and new addition.	Provide additional space for maintenance function in existing structure and new addition.	Provide additional space for maintenance function in existing structure and new facility.
No dedicated educational storage space exists.	No dedicated educational storage space exists.	Provide dedicated educational storage space in Wilcox House.	Provide dedicated educational storage space in new addition.	Provide dedicated educational storage space in new addition.	Provide dedicated educational storage space in new facility.
VISITOR USE AND EXPERIENCE					
2 nd floor multi-purpose room continues to serve as educational space.	2 nd floor multi-purpose room continues to serve as educational space.	Devote multi-purpose room to educational functions.	Provide dedicated educational space in new addition.	Provide dedicated educational space in new addition.	Provide dedicated educational space in new facility.
Exhibit gallery remains in multi-use space.	Exhibit gallery remains in multi-use space.	Remove exhibit gallery from multi-purpose room to other location in Wilcox House.	Remove exhibit gallery from multi-purpose room to present admissions area and gift shop.	Remove exhibit gallery from multi-purpose room to present admissions area and gift shop.	Remove exhibit gallery from multi-purpose room to present admissions area and gift shop.

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non- Historic Portion of NHS
Gift shop remains as at present.	Install a central admissions desk to help facilitate visitor flow. Relocate gift shop to present exhibit area.	Install a central admissions desk to help facilitate visitor flow. Remove gift shop to present exhibit area.	Provide sufficiently sized admissions area in new addition. Provide single space for gift shop adjacent to admissions in new addition.	Provide sufficiently sized admissions area in new addition. Provide single space for gift shop adjacent to admissions in new addition.	Provide sufficiently sized admissions area in new facility. Provide single space for gift shop adjacent to admissions in new facility.
UNIVERSAL ACCESS					
Universal access remains as at present.	Install elevator in infill area to provide universal access to basement, 1 st and 2 nd floors. Construct ramp to east entrance of Wilcox House; remove lift. Make 1 st floor restrooms accessible.	Install elevator in infill area to provide universal access to basement, 1 st and 2 nd floors; install elevator in off-site facility to support curatorial storage and administrative functions. Construct ramp to east entrance of Wilcox House; remove lift. Make 1 st floor restrooms accessible.	Install elevator in new addition to provide universal access to basement, 1 st and 2 nd floors. Provide universal access at main visitor entry in new addition. Remove lift. Make 1 st floor restrooms accessible.	Install elevator in new addition to provide universal access to basement, 1 st and 2 nd floors. Provide universal access at main visitor entry in new addition. Remove lift. Make 1 st floor restrooms accessible.	Install elevator in infill area to provide universal access to basement, 1 st and 2 nd floors; install elevator in new facility to support visitor services. Provide universal access at main visitor entry in new facility. Construct ramp to east entrance of Wilcox House; remove lift. Make 1 st floor restrooms, and those in new facility accessible.
COMMON TO ALL ACTION ALTERNATIVES					
Update Historic Structures Report. Underground utilities to remove unsightly utility pole from visitors' view.					

Summary of Costs

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
INITIAL ONE-TIME COSTS (in 2005 dollars)*					
NPS: \$367,500 TRISF: \$0 Total: \$367,500	NPS: \$729,500 TRISF: \$452,200 Total: \$1,181,700	NPS: \$729,500 TRISF: \$747,200 Total: \$1,476,700	NPS: \$729,500 TRISF: \$1,128,000 Total: \$1,858,100	NPS: \$729,500 TRISF: \$1,128,000 Total: \$1,858,100	NPS: \$729,500 TRISF: \$1,128,000 Total: \$1,858,100
ANNUAL COSTS (in 2005 dollars)**					
\$480,000	\$482,050	\$542,100	\$499,660	\$499,660	\$541,250
TOTAL LIFE-CYCLE COSTS (Annualized)***					
\$731,951	\$804,691	\$922,328	\$891,714	\$891,714	\$953,865

NOTES:

*It is anticipated that the NPS will cover costs associated with replacement/reconfiguration of the Wilcox House and any acquired structures, while the Foundation (TRISF) will cover costs for program space improvements, land acquisition, and new construction.

** The enabling legislation stipulates that operation of the NHS be supported by private funds. Legislation enacted in 1980 authorized the NPS to contribute up to 2/3 of the site's annual operating budget. Since FY2000, the Foundation has provided more than 1/2 of the total budget. It is anticipated that the Foundation will continue to provide between 1/3 and 1/2 of the annual operations costs.

*** The National Park Service Director's Order #90 defines life-cycle cost as: "The total cost of a system, facility, or other product, computed over its useful life. It includes all relevant costs involved in acquiring, owning, operating, maintaining, and disposing of the system or product over its useful life or other specified period of time, including environmental and energy costs." The life cycle cost figures shown above indicate the total costs of the proposed facilities for each year over a 25-year period from the present date, allowing for inflation.

Conclusion

The team developed and considered six alternative ways to better provide interior space for the operation of the Theodore Roosevelt Inaugural National Historic Site. Of the six alternatives considered, the team determined that "Alternative D: New Addition on Carriage House Site" best fulfills the objectives of the plan amendment, with the least impact on the resources. It provides sufficient additional square footage, in a way that is compatible with the cultural landscape, as it returns the original massing and scale of the carriage house. Alternatives E and F introduce modern intrusions that did not exist in 1901. Unlike alternatives C and F, Alternative D provides this space without requiring the Foundation to operate two independent facilities, with all the redundancies of equipment, services, and staffing that two independent structures require. Operation of two independent facilities is less desirable from the standpoint of the Foundation than the operation of one, due to the associated increase in costs and complexity.

Alternatives Considered but Not Advanced

The planning team considered an alternative to reconstruct the exterior of the historic carriage house with contemporary interiors (as opposed to Alternative D, which proposes a new addition of similar massing and scale to the original carriage house.) Chapter 5 of NPS 2001 *Management Policies* states, in Section 5.3.5.4.4 the following regarding the reconstruction of missing structures:

No matter how well conceived or executed, reconstructions are contemporary interpretations of the past rather than authentic survivals from it. The National Park Service will not reconstruct a missing structure unless:

- There is no alternative that would accomplish the park's interpretive mission;
- Sufficient data exist to enable its accurate reconstruction based on the duplication of historic features substantiated by documentary or physical evidence, rather than on conjectural designs or features from other structures;
- Reconstruction will occur in the original location; the disturbance or loss of significant archeological resources is minimized and mitigated by data recovery.

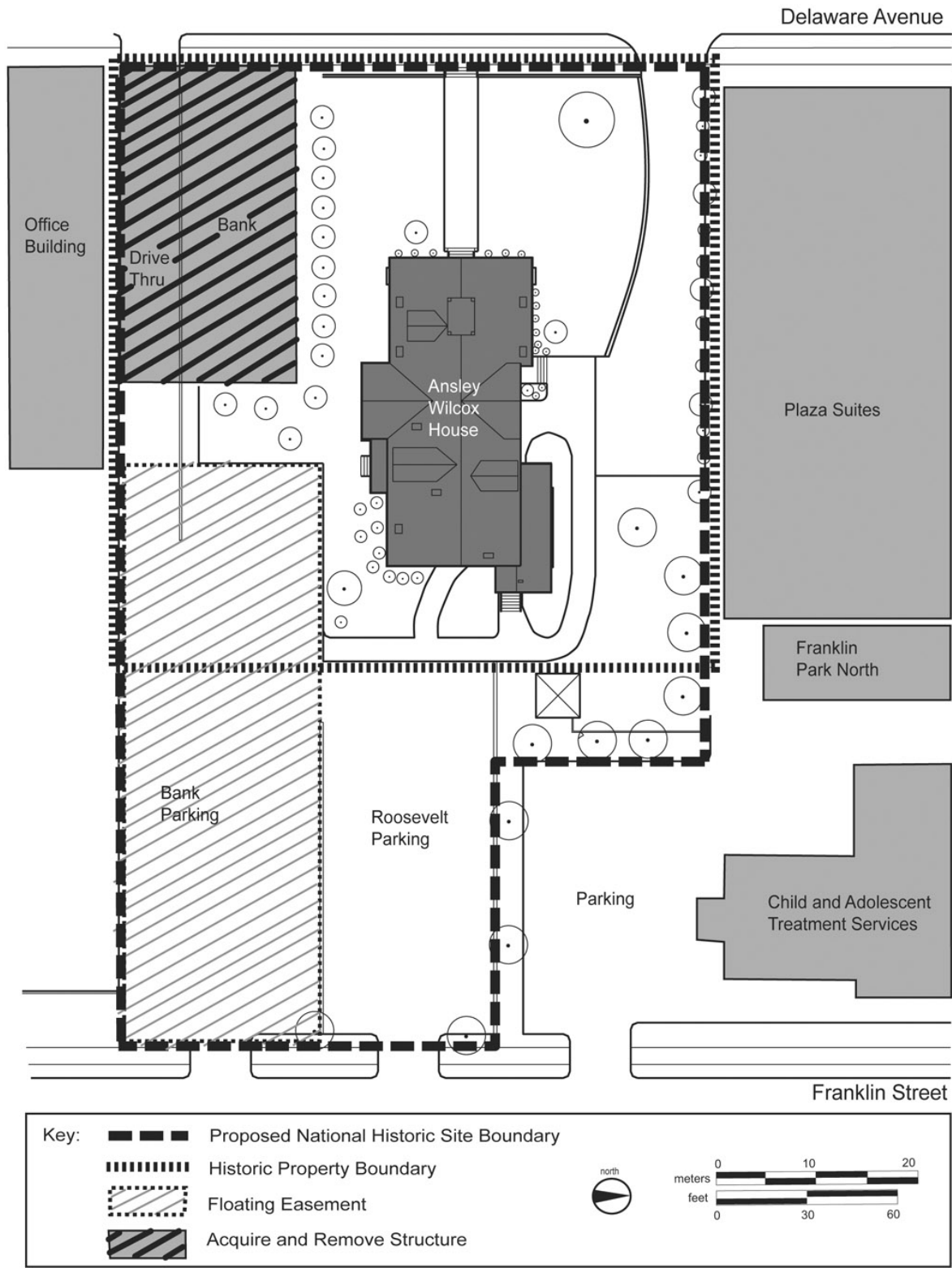
The proposal to reconstruct the exterior of the historic carriage house was not advanced because the team felt it did not fulfill the first two criteria. As stated above, NPS policies support reconstruction only if it is central to fulfill the interpretive objectives of the park unit. Given that the inaugural ceremony took place in the Wilcox House, not the carriage house, the team felt that the carriage house is not essential to the interpretation of the inaugural. In addition, insufficient information exists on the appearance of the exterior of the carriage house. The only known photographs of the carriage house depict only the façade facing Delaware Avenue. During the planning process, park staff contacted the City of Buffalo Building Department and the Buffalo Historical Society to see if additional information was available on the carriage house, but none was found. For these reasons, the team did not pursue this proposal.

Proposed Action: Boundary Adjustment

This Master Plan Amendment proposes to expand the boundary of the NHS to restore the property to its full extent at the time of the inauguration. This would enable the NPS to acquire by donation or purchase with private or federal funds, the bank property and its related easement, should these properties become available in the future. The bank building would then be removed and the landscape returned to its former grade and appearance, as much as is possible. These actions would enable site managers to remove a major modern intrusion from the historic scene and present the property more closely to the way it appeared in 1901, when Theodore Roosevelt took the oath of the presidency. (Should the property become available at a time after the bank building has reached 50 years of age, the building would be evaluated for National Register eligibility prior to any action being taken.)

At such time that the NPS and the Foundation determine that the bank property is available for acquisition, a detailed Legislative Support Package will be assembled. This document will detail the role that the NPS and/or the Foundation will play in such acquisition. A current informal cost estimate for the acquisition, demolition, and site restoration is \$650,000.

Figure 10: Boundary Adjustment



Application of National Park Service Criteria for Boundary Adjustments

National Park Service management policies provided guidance for this study and list the following conditions or reasons as criteria under which the NPS may recommend boundary revisions:

- To include significant resources or opportunities for public enjoyment related to the purposes of the park.
- To address operational and management issues, such as access and boundary identification by topographic or other natural features or roads.
- To protect resources critical to fulfilling the park's purposes.

Recommendations to expand park boundaries will be preceded by determinations that:

- The added lands will be feasible to administer considering size, configuration, ownership, costs, and other factors.

Do these properties include significant resources or opportunities for public enjoyment related to the purposes of the park?

The southwest corner of the historic Wilcox property is presently outside of the NHS boundary. On this corner stands a modern glass-and-concrete bank building that was completed in the 1960s. The lands on which the bank sits were part of the Wilcox landscaped grounds. The structure is situated less than 15 feet from the south side of the Wilcox House and dominates the historic scene. In fact, to protect the historic character of the property from the *inside* of the house, site staff must routinely close the curtains on the south wall to block views to the structure. Given the intimate scale of the NHS—roughly one acre—the modern bank structure looms large and overwhelms the stately, but more subdued, Wilcox House. The modern structure severely diminishes the integrity of the historic setting of the National Historic Site.

Restoring the original boundary of the historic Wilcox property would enable site managers to present and interpret the cultural landscape of the Wilcox property in its entirety. It would allow the removal of a major intrusion from the site's historic setting and enable site managers to restore the breadth, feel, and overall aesthetic of the Victorian-era Wilcox House and manicured grounds.

Can the properties address operational and management issues, such as access and boundary identification by topographic or other natural features or roads?

For the visitor unfamiliar with Buffalo, the site's lack of visibility makes finding one's way to the NHS difficult. The modern bank structure on the former Wilcox grounds blocks the view of the Wilcox House for those traveling north on Delaware Avenue. When driving north, by the time one can see the Wilcox House, one has driven past it.

Restoring the original boundary of the historic Wilcox property would enable site managers to remove the modern bank structure, thereby opening up views to the Wilcox House from Delaware Avenue. Not only would this improve the overall aesthetic qualities of the NHS, but it would assist visitors in finding their way to the site.

Does inclusion of these properties protect resources that are critical to fulfilling the park's purposes?

Inclusion of these properties would protect resources that are critical to fulfilling the park's purposes. These resources include:

- The site's historic setting, which is woefully compromised by the presence of a modern glass-and-concrete structure situated nearly at arm's length from the 1838 structure.
- The original extent of the historic property, which included these lands.

Are the added lands feasible to administer considering size, configuration, ownership, costs, and other factors?

The added lands would be feasible to administer. The parcel consists of 0.15 acre of land, is contiguous with the NHS property, and is under one ownership. The costs associated with the property would largely be one-time costs for acquisition, for removing the structure, and for grading the landscape.

Management Zoning

National Park Service park planning policies require that management zones be designated to identify which management approaches apply to particular areas of a park or national historic site. As the following map indicates, the planning team identified two management zones for the site: the Preservation Zone and the Site Support Zone.

The Preservation Zone embraces areas in the Wilcox House that are specifically associated with the events surrounding the inaugural: the library, in which the inaugural ceremony took place, the morning room, the scene of Theodore Roosevelt's first official act as president, and the dining room, where Theodore Roosevelt would have had his meals during his visit. It also embraces the approximate front half of the grounds facing Delaware Avenue, including the landscape features listed on the List of Classified Structures: the carriage drive, the sandstone sidewalk, the bluestone steps, and the front retaining wall.

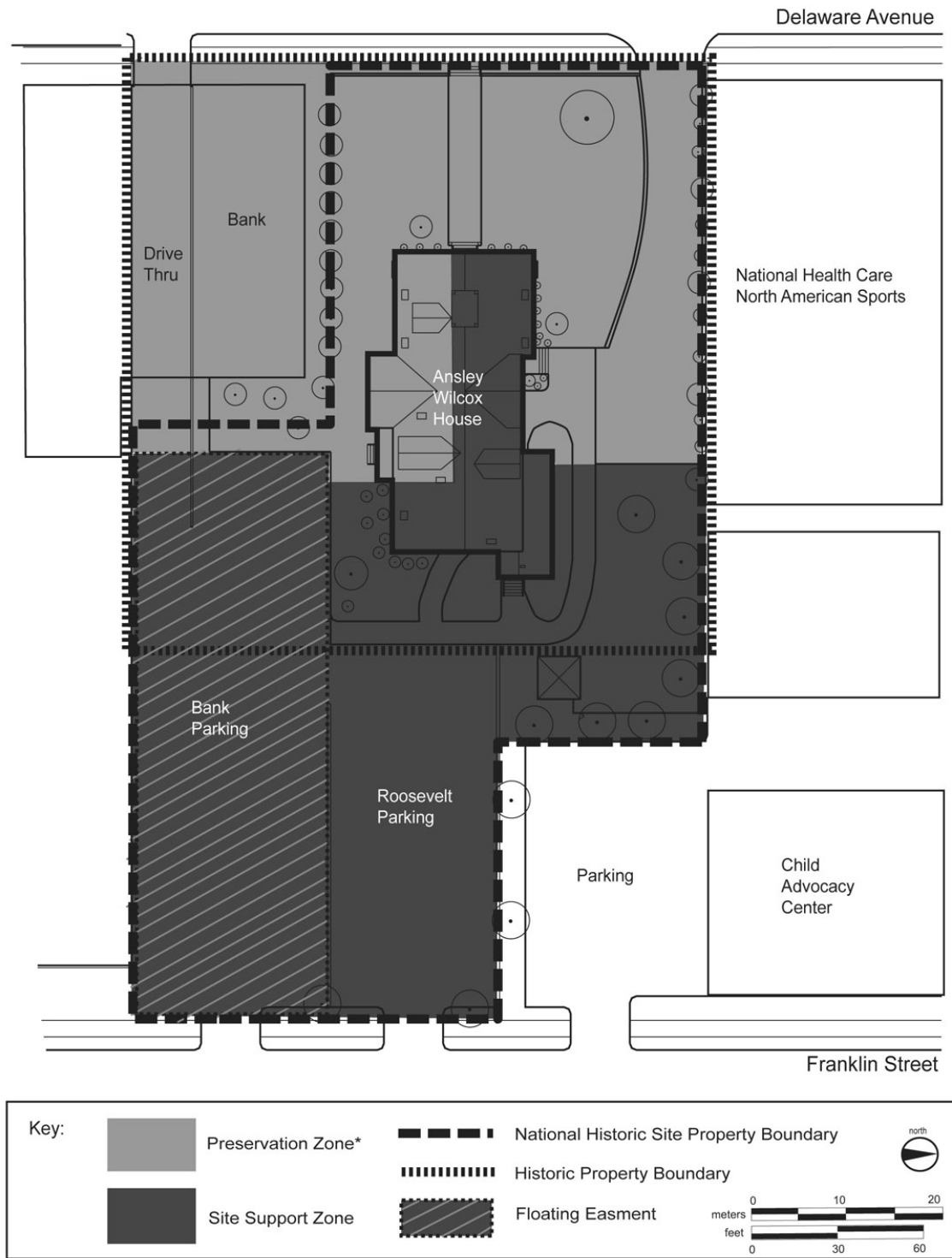
The Site Support Zone embraces the remaining areas of the Wilcox House, which have been modified over the years, first to accommodate the restaurant, and then to accommodate visitor services, and site support. It also embraces the approximate back half of the grounds, which have been modified over the years to accommodate the restaurant (i.e. removal of the carriage house for parking), and then for visitor services (i.e. installation of new parking areas and pathways), and site support (i.e. installation of the small maintenance structure). No cultural landscape features listed on the List of Classified Structures exist in this zone (although the entire Wilcox House is listed on the List of Classified Structures).

The configuration of the management zones remains constant for all alternatives because they are based on the resources they embrace. The configuration of the zones may need to be adjusted if new information becomes available that changes our understanding of the events of 1901.

Management actions associated with the Preservation Zone would focus on resource preservation and interpretation. In these areas, visitors would encounter primary historic resources associated with the inaugural that have been restored and/or rehabilitated to reflect their 1901 appearance. Restoration and rehabilitation would be the preservation treatments allowed in this zone. Visitors would have close contact with the historic resources in this zone and learn about them through guided tours, publications, and other interpretive media. Development in these areas would be allowed, but would be limited to the minimum necessary to provide fundamental services, such as visitor access and interpretation. Such infrastructure would be carefully designed and sited to protect resources, including cultural landscape values, and to enhance visitor experiences.

Management actions associated with the Site Support Zone would focus on providing visitor services and site support. In these areas, visitors would encounter historic resources that have been adapted for visitor orientation, interpretation, and support, as well as new structures. Visitors would have contact with exhibits and interpretive media in this zone, and have access to a range of visitor services, amenities, and conveniences intended to provide a safe and enriching experience. Adaptive use of properties, as well as new construction, would be allowed in this zone. Types of development included in this zone would be visitor facilities, access roads, parking, walkways, and maintenance, administrative, and other site support facilities. Development in this zone would be carefully designed and sited to protect resources, including cultural landscape values, and to enhance visitor experiences.

Figure 11: Management Zoning



* Please note that only the Library, Morning Room, and Dining Room on the first floor are included in the Preservation Zone.

Part Three: Affected Environment

The following chapter provides a description of the site resources that could be affected by the proposals outlined in “Part Two: Alternatives.”

Archeological Resources

Ten prehistoric sites have been previously recorded within a two-mile radius of the site. No sites lie within the NHS property. The distribution of previously recorded sites, along with other background research data, suggests that the National Historic Site has a low probability to yield prehistoric resources. This may be further degraded by modern land use including recent utility installations, industrial and commercial development, parking lot and sidewalk constructions, and landscaping. Deeply buried archeological sites are not expected in the National Historic Site due to its distance from any streams.

Twenty Euro-American sites have been recorded within a two-mile radius of the site. Most of the sites consist of construction debris or foundations of late-19th to early-20th-century commercial and residential buildings. Several sites are the foundations of 19th-century roads. One historic burial was uncovered about one mile to the south of the National Historic Site.

There are four historic map-documented structures located on the grounds. Shovel testing within the vicinity of three produced no contextual evidence of the associated structures, nor did they yield sufficient data to assess National Register eligibility status. The fourth is a carriage house associated with the c. 1881–1938 Wilcox occupation of the site. Portions of the carriage house foundation wall were located immediately beneath the second soil layer. Though intact portions of this foundation have been identified, a lack of integrity and diagnostic artifacts combine to limit the research and data recovery potential of the deposits associated with the former carriage house. Based on this work, these deposits fail to qualify for listing on the National Register.

Collections

The NHS has a collection of some 5,000 objects including original furnishings, books, textiles, paintings and prints, clothing, china, glassware, and other domestic objects. About 70% of the collection is kept in storage. Current curatorial storage conditions and exhibit areas do not meet NPS requirements for museum collections. The fluctuations in temperature and humidity threaten the long-term survival of artifacts and collections. These conditions also make monitoring, management, and preservation of the collection both extremely difficult and inefficient.

Cultural Landscape

The majority of the surrounding Victorian homes and grounds have been replaced by modern commercial structures. The character of the area has changed from a stately Victorian residential neighborhood to a bustling commercial downtown. Adjacent to the site is a bank with drive-thru service and parking lot. The historic landscape therefore is strictly composed of on-site features.

The site's cultural landscape includes the vegetation, the circulation system, and the landscape features surrounding the Ashley Wilcox House.

The vegetation includes manicured lawns that extend directly up to the Wilcox House, with a scattering of lilacs and other shrubs. Several mature shade trees exist, lending a park-like appearance and a fairly continuous canopy over the grounds.

The circulation system separates the vehicular access and parking from the pedestrian portions of the site. Automobiles access the site from Franklin Street and park in the designated parking lot to the east of the Wilcox House. Visitors access the house via a pedestrian sidewalk to the north entrance of the house, and therefore do not pass by or view the front (western) façade and porch. The pedestrian visitor approaching the site along Delaware Avenue can view the front façade and porch, but cannot access this entry.

The unpaved drive survives from at least Roosevelt's inauguration date in 1901. Although the carriage house was removed in the 1930s, the drive reflects the historic vehicular site circulation. The drive is not part of the site's current vehicular circulation system.

The walkway system dates to at least the development of Delaware Avenue as a primary street in Buffalo. The pathways were in place at the time of Roosevelt's 1901 presidential inauguration. Included in the circulation system are a set of bluestone steps that date at least to the Lannings' ownership. The stone steps were part of the site during Roosevelt's 1901 presidential inauguration.

A retaining wall that runs parallel to Delaware Avenue dates at least to the period when Delaware Avenue became a primary residential street and the main entrance of the house was reoriented to the west. It was extant at the time of Roosevelt's 1901 presidential inauguration.

Historic Structure

The main feature of the National Historic Site is the Ansley Wilcox House, the building where Theodore Roosevelt took oath of office as President of the United States on September 14, 1901, after the death of President McKinley. At that time, the structure was the home of Roosevelt's friend, Ansley Wilcox. It is a three-story gable-roofed Greek Revival house with a painted brick, two-story colonnaded front portico, and a Palladian pediment window.

The structure was originally built as officers' quarters for an army base in 1838. The officers' quarters structure then passed into private ownership. In 1863, Albert P. Lanning acquired the building. During his occupancy, Lanning added a two-story service wing on the east end of the structure and constructed a full basement under the main part of the house.

In 1883, Dexter Rumsey purchased the house as a wedding gift for his daughter, Mary Grace, and her husband, Ansley Wilcox. In 1883, the couple moved in and made the residence their permanent home. The first change made by the Wilcoxes was the installation of a bay window in the south side of the library. In 1896, the Wilcoxes tripled the size of the original building by demolishing the Lanning service wing and adding approximately 60 feet of building to the east, including a basement, two floors, and an attic. The Wilcoxes lived in the house until their deaths in the early 1930s.

In 1938, the Kathryn and Oliver Lawrence leased the house and extensively renovated the building for operation as a restaurant. Many walls and architectural features, such as the main staircase, were removed to accommodate a large dining area on the 1st floor and a large banquet space on the 2nd floor. The house was extended by about 400 square feet on the north side. This "infill area" incorporated the south wall of the carriage house, which was torn down to provide parking for the restaurant. The Kathryn Lawrence Tea Room and Restaurant was opened by 1939 and for 20 years was one of the most popular restaurants in Buffalo.

In the early 1960s, the Wilcox House stood vacant. Following threats from a developer that the structure would be demolished for a parking lot, community volunteers led a major effort to secure the house's positive future. With legislation pending, the Liberty National Bank purchased the property and held it until federal funding could be secured. The Ansley Wilcox House was declared a National Historic Site in 1966 and opened to the public on September 14, 1971, seventy years after Roosevelt took the presidential oath. In preparation for its opening to the public, portions of the structure—the library, morning room, and front entry—were restored to reflect their appearance in 1901.

Operations

Theodore Roosevelt Inaugural National Historic Site is a one-acre urban park with all administrative and maintenance functions, as well as visitor activities, currently taking place within the Ansley Wilcox House. The NHS operates under a unique partnership between the NPS and the Theodore Roosevelt Inaugural Site Foundation. While the park is owned by the federal government, its enabling legislation establishes that the management of the park will be carried out by a separate entity, the Foundation. All park staff members are Foundation, not federal, employees. Park legislation states that the NPS will provide up to 2/3 (66%) of the site's annual operating budget, with the Foundation contributing the remainder. The site is also eligible for NPS one-year project funds. A cooperative agreement guides this successful 38-year partnership.

Universal Access

Universal access to the Wilcox House is provided at the east side, or rear, of the structure. One means of access is via a lift to the basement level; the other is via a portable ramp to the 1st floor, which is available on demand. Both means of access are marginal. The lift is constantly in need of repair, is awkward to use, and at present is non-functional. The portable ramp is inconvenient and awkward, as well, and doesn't work for many wheelchairs and scooters. The only accessible restrooms in the Wilcox House are located on the basement level (which, at present, is not accessible). The 2nd and 3rd floors are not wheelchair accessible.

Visitor Use and Experience

Some 20,000 people visit the Theodore Roosevelt Inaugural NHS each year. Fees are charged for admission: \$3.00 for Adults; \$2.00 for seniors; and \$1.00 for children. Advance reservations are required for groups of 10 or more.

Visitors arrive at the Ansley Wilcox House via the parking area off Franklin Street at the rear of the structure. From the parking area, visitors proceed to the north entrance of the house, which was the primary entrance used by the Wilcox Family. After moving through the admissions area, visitors then proceed to the orientation room at the east end of the 1st floor to view a short audio-visual program highlighting the events that took place in Buffalo in 1901. An interpreter or volunteer docent then guides visitors through the four period rooms and exhibit area.

The Wilcox library is the primary focus of the house tour. Meticulously restored to its 1901 appearance and containing original furniture, the library was the scene of Theodore Roosevelt's inauguration. The circumstances surrounding the inauguration are interpreted in this room, as well as the lifestyle of an upper-class family.

Visitors are then led to an exhibit area across from the library. The exhibit provides further information on the inaugural and on Roosevelt's presidency.

Visitors then view the morning room, which was used by Theodore Roosevelt as a temporary office and was the scene of his first official act as president. Part of the addition the Wilcoxes added in the 1890s, the morning room is unique in the house with its Gothic Revival style. The morning room contains Ansley Wilcox's original desk and a copy of the scrapbook he kept.

Visitors then proceed to the dining room, where Theodore Roosevelt would have had his meals during his visit. Few changes were made to this room when the house was used as a restaurant. It is the most intact in the house, although it contains very little of the original dining room furniture. Lifestyle and the importance of preservation are interpreted here.

Visitors then proceed to the 2nd floor to view exhibits and the re-created Victorian Lady's Bedroom. The bedroom is used for interpreting lifestyles of the period and addresses such topics as lighting and heating of the home, the importance of sewing in a woman's life, and the role of servants in the household.

At the end of their visit, visitors are encouraged to tour the gift shop on the second floor.

Part Four: Environmental Consequences

Introduction

This section describes the environmental consequences associated with each alternative. It is organized by the identified impact topics. These topics allow for a standardized comparison between the alternatives based on their impact to the environment. The National Environmental Policy Act (NEPA) of 1969 required consideration of type, context, duration, intensity, and direct, indirect, and cumulative impacts. NPS policy also requires that “impairment” of park resources be evaluated in all environmental documents.

Methodology for Analyzing Impacts

The planning team based this impact analysis and conclusions largely on the review of existing research and studies, information provided by subject matter experts, and site staff professional judgment. The terms of potential impacts are described as follows:

Type: are the effects positive or negative;

Context: are the effects site-specific, local, or regional;

Duration: are the effects short-term, lasting less than one year, or long-term, lasting more than one year; and

Intensity: are the effects negligible, minor, moderate, or major. The definitions of the intensity levels are outlined on the following pages.

The Council on Environmental Quality regulations, which implement NEPA, requires the assessment of cumulative effects in the decision-making process for federal projects. Cumulative effects are defined as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or nonfederal) or person undertakes such other action.” (40 CFR 1508.7) Cumulative effects can result from individually minor, but collectively significant, actions taking place over a period of time.

This document serves as a vehicle for both NEPA and Section 106 compliance for historic preservation. A determination of effect for Section 106 was considered for Alternative D, the Preferred Alternative. The criteria for impact intensities indicate how the determination of effect was applied for archeology, cultural landscapes, and historic structures. The NPS has proposed that Alternative D, the Preferred Alternative, has no adverse effect subject to review of plans for rehabilitation by the New York State Historic Preservation Officer to ensure consistency with the Secretary of the Interior’s *Standards for the Treatment of Historic Properties*.

Criteria for Impact Intensities

Archeological Resources	Collections	Cultural Landscapes	Historic Structures	Visitor Experience	Operations	Universal Access
NEGLIGIBLE						
Impact is at the lowest levels of detection with neither positive nor negative consequences. Determination of effect for Section 106 would be <i>no adverse effect</i> .	Impact is at the lowest levels of detection; barely perceptible and not measurable without consequences, either positive or negative to the collection.	Impact barely perceptible and not measurable. Determination of effect for Section 106 would be <i>no adverse effect</i> .	Impact barely perceptible and not measurable. Determination of effect for Section 106 would be <i>no adverse effect</i> .	Impact barely detectable, not in primary resource areas or would occasionally affect a few visitors.	Operations would not be affected, or the effects would be at low levels of detection and would not have an appreciable effect on operations.	Impact not detectable, no discernible effect on universal access.
MINOR						
Negative Impact: disturbance of a site results in little, in any, loss of integrity. Determination of effect for Section 106 would be <i>no adverse effect</i> . Positive Impact: maintenance and preservation of a site. Determination of effect for Section 106 would be <i>no adverse effect</i> .	Negative Impact: would affect the integrity of a few items in the collection, but would not degrade the usefulness of the collection for future research and interpretation. Positive Impact: would stabilize the current condition of the collection or its constituent components to minimize degradation.	Negative Impact would alter a pattern or feature of the cultural landscape but would not diminish overall integrity of the landscape. Determination of effect for Section 106 would be <i>no adverse effect</i> . Positive Impact: preservation of landscape pattern or feature in accordance with the Secretary of the Interior's standards. Determination of effect for Section 106 would be <i>no adverse effect</i> .	Negative Impact would alter a feature or a limited amount of fabric in an historic structure but would not diminish overall integrity of the structure. Determination of effect for Section 106 would be <i>no adverse effect</i> . Positive Impact: preservation of a feature or some historic fabric in accordance with the Secretary of the Interior's standards. Determination of effect for Section 106 would be <i>no adverse effect</i> .	Impact would change a few visitors' experiences, which would be noticeable but would result in little distraction or improvements in the quality of the experience.	Impact slightly detectable but would not obstruct or improve overall ability to provide services, to manage resources, or to operate the park.	Impact would change a few handicapped visitors' experiences, which would be noticeable but would result in little obstruction or improvement in the overall quality of the experience for visitors with disabilities.
MODERATE						
Negative Impact: disturbance of site results in loss of integrity. The determination of effect for Section 106 would be <i>adverse effect</i> . A memorandum of agreement is	Negative Impact: would affect the integrity of many items in the collection and diminish the usefulness of the collection for future	Negative Impact: alteration of a pattern or feature of the landscape would diminish overall integrity. The determination of effect for Section 106 would be <i>adverse effect</i> . A	Negative Impact: alteration of a feature would diminish overall integrity of the resource. The determination of effect for Section 106 would be <i>adverse effect</i> . A memorandum of	Impact would change a large number of visitors' experiences and would result in a noticeable decrease or improvement	Impact clearly detectable and could appreciably obstruct or improve the ability to provide services, to manage	Impact would change a large number of handicapped visitors' experiences and would result in a noticeable

Archeological Resources	Collections	Cultural Landscapes	Historic Structures	Visitor Experience	Operations	Universal Access
<p>executed among the National Park Service and applicable SHPO and, if necessary, the Advisory Council on Historic Preservation in accordance with 36 CFR 800.6(b). Measures identified in the MOA to minimize or mitigate adverse impacts reduce the intensity of impact under NEPA from major to moderate.</p> <p>Positive Impacts: stabilization of a site.</p> <p>Determination of effect for Section 106 would be <i>no adverse effect</i>.</p>	<p>research and interpretation.</p> <p>Positive Impact: Would improve the condition of a large percentage of the collection by eliminating most security and protection threats.</p>	<p>memorandum of agreement is executed among the National Park Service and applicable SHPO and, if necessary, the Advisory Council on Historic Preservation in accordance with 36 CFR 800.6(b). Measures identified in the MOA to minimize or mitigate adverse impacts reduce the intensity of impact under NEPA from major to moderate.</p> <p>Positive Impact: rehabilitation of a landscape or significant patterns and features in accordance with the Secretary of the Interior's standards.</p> <p>Determination of effect for Section 106 would be <i>no adverse effect</i>.</p>	<p>agreement is executed among the National Park Service and applicable SHPO and, if necessary, the Advisory Council on Historic Preservation in accordance with 36 CFR 800.6(b). Measures identified in the MOA to minimize or mitigate adverse impacts reduce the intensity of impact under NEPA from major to moderate.</p> <p>Positive Impact: rehabilitation of a property or considerable amount of fabric in accordance with the Secretary of the Interior's standards.</p> <p>Determination of effect for Section 106 would be <i>no adverse effect</i>.</p>	<p>in the quality of the experience.</p>	<p>resources, and/or to operate the park.</p>	<p>decrease or improvement in the quality of universal access.</p>
MAJOR						
<p>Negative Impact: disturbance of a site results in loss of integrity. Determination of effect for Section 106 would be <i>adverse effect</i>. Measures to minimize or mitigate the adverse impacts cannot be easily agreed upon and the NPS and applicable SHPO and/or Advisory Council are unable to negotiate and execute a MOA in accordance with</p>	<p>Negative Impact: would affect the integrity of most items in the collection and destroy the usefulness of the collection for future research and interpretation.</p> <p>Positive Impact: Would secure the condition of the collection as a whole (including objects on</p>	<p>Negative Impact: alteration of a pattern or feature of the landscape would diminish overall integrity of the landscape. Determination of effect for Section 106 would be <i>adverse effect</i>. Measures to minimize or mitigate the adverse impacts cannot be easily agreed upon and the NPS and applicable SHPO and/or Advisory Council are unable to negotiate and</p>	<p>Negative Impact: alteration of a feature would diminish overall integrity of the resource. Determination of effect for Section 106 would be <i>adverse effect</i>. Measures to minimize or mitigate the adverse impacts cannot be easily agreed upon and the NPS and applicable SHPO and/or Advisory Council are unable to negotiate and execute a MOA in accordance with 36 CFR 800.6(b).</p>	<p>Impact has a substantial improvement in many visitors' experiences or a severe drop in the quality of many visitors' experiences, such as the addition or elimination of a recreational opportunity or a permanent change to an area.</p>	<p>Impact would have a substantial, highly noticeable, potentially permanent influence on the ability to provide services, to manage resources, or to operate the park.</p>	<p>Impact has a substantial improvement in the majority of handicapped visitors' experiences or a severe drop in the quality of the majority of handicapped visitors' experiences.</p>

Archeological Resources	Collections	Cultural Landscapes	Historic Structures	Visitor Experience	Operations	Universal Access
36 CFR 800.6(b). Positive Impacts: active intervention to preserve a site. Determination of effect for Section 106 would be <i>no adverse effect</i> .	exhibit) by eliminating most security and protection threats.	execute a MOA in accordance with 36 CFR 800.6(b). Positive Impact: Restoration of a landscape or significant patterns or features in accordance with the Secretary of the Interior's standards. Determination of effect for Section 106 would be <i>no adverse effect</i> .	Positive Impact: Restoration of a property or a considerable amount of fabric in accordance with the Secretary of the Interior's standards. Determination of effect for Section 106 would be <i>no adverse effect</i> .			

Environmental Impacts of Each Alternative

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
ARCHEOLOGICAL RESOURCES					
No ground - disturbing activities would take place; therefore, this alternative would have no impact on archeological resources.	Minimal ground-disturbing activities would take place to accommodate undergrounded utilities; therefore, this alternative would have negligible impacts on archeological resources.	Minimal ground - disturbing activities would take place to accommodate modified circulation system and undergrounded utilities. This would result in negligible impacts on archeological resources.	Construction activities would disturb resources associated with former carriage house. These resources have been deemed ineligible for the National Register. This alternative would result in a minor, negative, long-term impact on archeological resources. <u>Section 106 Finding:</u> Because remains are not National Register eligible, there would be no impact and therefore the	Construction activities would disturb resources associated with the 548 Franklin Street carriage house (believed to date to 1901). Preliminary findings indicated that these resources are ineligible for the National Register. This alternative would result in a minor, negative, long-term impact on archeological resources.	Construction activities would disturb resources. Previous field tests revealed little of any value in the area of disturbance. This alternative would result in a minor, negative, long-term impact on archeological resources.

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
			determination of effect for Section 106 would be <i>no adverse effect.</i>		
Cumulative Impacts: Because few ground-disturbing activities have been conducted on the NHS since its designation and no other ground-disturbing activities beyond those described in this Amendment are anticipated, none of the alternatives would contribute any increment to cumulative effects on archeological resources.					
COLLECTIONS MANAGEMENT					
Environmental conditions remain as at present, with storage areas remaining un-secured. This would result in major, negative, long-term impact on the collection from inadequately sized, unsecured storage areas with improper climate control.	Environmental conditions would be improved, with secured storage areas. This would result in a moderate positive, long-term impact on the collections from secured storage areas with proper climate control.	Environmental conditions would be improved, with secured storage areas, and adequate, dedicated collection storage space. This would result in a major, positive, long-term impact on the collection from adequately sized, secured storage areas with proper climate control.	Environmental conditions would be improved, with secured storage areas, and adequate, dedicated collection storage space. This would result in a major, positive, long-term impact on the collection from adequately sized, secured storage areas with proper climate control.	Environmental conditions would be improved, with secured storage areas, and adequate, dedicated collection storage space. This would result in a major, positive, long-term impact on the collections from adequately sized, secured storage areas with proper climate control.	Environmental conditions would be improved, with secured storage areas, and adequate, dedicated collection storage space. This would result in a major, positive, long-term impact on the collections from adequately sized, secured storage areas with proper climate control.
Cumulative Impact: Since the NHS was designated, modifications to the NHS were made to improve collections management. The proposals made in the action alternatives would contribute to an overall incremental improvement in the management of the site's collection.					
CULTURAL LANDSCAPES					
No alterations to the cultural landscape would take place; therefore, this alternative would have no impact on the cultural landscape.	The adjacent bank building would be acquired and removed. This would result in a major, positive, long-term impact on the historic setting by restoring the property to its original dimensions and removing a dominating modern intrusion from within the historic boundary.	The adjacent bank building would be acquired and removed. This would result in a major, positive, long-term impact on the historic setting by restoring the property to its original dimensions and removing a dominating modern intrusion from within the historic boundary.	The adjacent bank building would be acquired and removed. This would result in a major, positive, long-term impact on the historic setting by restoring the property to its original dimensions and removing a dominating modern intrusion from within the historic boundary.	The adjacent bank building would be acquired and removed. This would result in a major, positive, long-term impact on the historic setting by restoring the property to its original dimensions and removing a dominating modern intrusion from within the historic boundary.	The adjacent bank building would be acquired and removed. This would result in a major, positive, long-term impact on the historic setting by restoring the property to its original dimensions and removing a dominating modern intrusion from within the historic boundary.

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
			Section 106 Finding: The determination of effect for Section 106 would be <i>no adverse effect</i>.		
			<p>The new addition would be constructed on the site of the former carriage house.</p> <p>This would have a moderate, positive, long-term impact on the visitor understanding of the historic scene because it would return the original massing and scale of the historic carriage house and more accurately represent the spatial arrangement of the property during its period of significance.</p> <p>Section 106 Finding: The determination of effect for Section 106 would be <i>no adverse effect</i>.</p>	<p>A new addition would be constructed on the east side of the Wilcox House.</p> <p>This would have a minor, negative, long-term impact on the visitor understanding of the historic scene because it would introduce a new mass that would less accurately represent the spatial arrangement of the property during its period of significance.</p>	<p>A new structure would be constructed on the non-historic portion of the property.</p> <p>This would have a minor, negative, long-term impact on the visitor understanding of the historic scene. Although technically not located on the historic property; the new structure would be positioned so close to the Wilcox House that it would impact the historic setting. Given that the structure would be located outside of the historic property boundary, however, it would not diminish the overall integrity of the cultural landscape.</p>
			<p>The new addition would be attached to the infill area of the Wilcox House, which would be retained.</p> <p>This would have a minor, negative,</p>		

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
			<p>long-term impact on the cultural landscape because it would preclude re-establishing the path historically located between the Wilcox House and Carriage House; and would truncate views to the front of property from the rear of the property.</p> <p>Section 106 Finding: The determination of effect for Section 106 would be no adverse effect.</p>		
	<p>Utilities would be located underground.</p> <p>This would have a minor, positive, long-term impact on the cultural landscape by removing the utility pole and more accurately portraying the historic scene.</p>	<p>Utilities would be located underground.</p> <p>This would have a minor, positive, long-term impact on the cultural landscape by removing the utility pole and more accurately portraying the historic scene.</p>	<p>Utilities would be located underground.</p> <p>This would have a minor, positive, long-term impact on the cultural landscape by removing the utility pole and more accurately portraying the historic scene.</p> <p>Section 106 Finding: The determination of effect for Section 106 would be no adverse effect.</p>	<p>Utilities would be located underground.</p> <p>This would have a minor, positive, long-term impact on the cultural landscape by removing the utility pole and more accurately portraying the historic scene.</p>	<p>Utilities would be located underground.</p> <p>This would have a minor, positive, long-term impact on the cultural landscape by removing the utility pole and more accurately portraying the historic scene..</p>
Cumulative Impacts: Because few alterations to the cultural landscape have been conducted since the designation of the NHS, and no other alterations beyond those described in this Amendment are anticipated, none of the alternatives would contribute any increment to cumulative effects to the cultural landscape.					
HISTORIC STRUCTURES					
No alterations to the Wilcox House would take place;	An historic structures report would be updated	An historic structures report would be updated	An historic structures report would be updated	An historic structures report would be updated	An historic structures report would be updated

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
therefore, this alternative would have no impact on the historic structure.	<p>followed by additional consultation with the SHPO when planning for structural modifications.</p> <p>This would result in a minor, positive, long-term impact on the historic structure by increasing the knowledge base associated with the site's primary historic resource.</p>	<p>followed by additional consultation with the SHPO when planning for structural modifications.</p> <p>This would result in a minor, positive, long-term impact on the historic structure by increasing the knowledge base associated with the site's primary historic resource.</p>	<p>followed by additional consultation with the SHPO when planning for structural modifications.</p> <p>This would result in a minor, positive, long-term impact on the historic structure by increasing the knowledge base associated with the site's primary historic resource.</p> <p>Section 106 Finding: The determination of effect for Section 106 would be <i>no adverse effect</i>.</p>	<p>followed by additional consultation with the SHPO when planning for structural modifications.</p> <p>This would result in a minor, positive, long-term impact on the historic structure by increasing the knowledge base associated with the site's primary historic resource.</p>	<p>followed by additional consultation with the SHPO when planning for structural modifications.</p> <p>This would result in a minor, positive, long-term impact on the historic structure by increasing the knowledge base associated with the site's primary historic resource.</p>
	<p>Minor alterations to the Wilcox House would take place, including moving certain functions from one area to another; installing a fire suppression system, upgrading electrical and HVAC systems, constructing a ramp to the east entrance, and making the 1st floor restroom accessible. In addition, an elevator would be installed in the infill area.</p> <p>This would result in minor, negative, long-</p>	<p>Minor alterations to the Wilcox House would take place, including moving certain functions from one area to another; installing a fire suppression system, upgrading electrical and HVAC systems, constructing a ramp to the east entrance, and making the 1st floor restroom accessible. In addition, an elevator would be installed in the infill area.</p> <p>This would result in minor, negative, long-</p>	<p>Substantial alterations to the Wilcox House would take place, including adding a new addition to the "infill area" on the site of the former carriage house; moving certain functions from one area to another, which could involve modifying interior elements; installing a fire suppression system; upgrading electrical and HVAC systems; and making the 1st floor restroom accessible.</p> <p>This would result</p>	<p>Substantial alterations to the Wilcox House would take place, including adding a new addition to the east façade of the historic structure; moving certain functions from one area to another, which could involve modifying interior elements; installing a fire suppression system; upgrading electrical and HVAC systems; and making the 1st floor restroom accessible.</p> <p>This would result in minor,</p>	<p>Minor alterations to the Wilcox House would take place, including moving certain functions from one area to another; installing a fire suppression system; upgrading electrical and HVAC systems; constructing a ramp to the east entrance; and making the 1st floor restroom accessible. In addition, an elevator would be installed in the infill area.</p> <p>This would result in minor, negative, long-</p>

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
	term impact on the historic fabric from modifications to the structure. Modifications would be guided by an historic structures report, and conducted as sensitively as possible. Mitigation measures, such as minimizing the alteration of original fabric as much as practicable, will be undertaken. The elevator would be located in the “infill area,” which was added subsequent to the period of significance, and therefore would have little impact 1901 fabric.	term impact on the historic fabric from modifications to the structure. Modifications would be guided by an historic structures report, and conducted as sensitively as possible. Mitigation measures, such as minimizing the alteration of original fabric as much as practicable, will be undertaken. The elevator would be located in the “infill area,” which was added subsequent to the period of significance, and therefore would have little impact 1901 fabric.	in minor, negative, long-term impact on the historic fabric from modifications to the structure. Modifications would be guided by an historic structures report, and conducted as sensitively as possible. Mitigation measures, such as minimizing the alteration of original fabric as much as practicable, will be undertaken. The addition would be attached via the “infill area,” which was added subsequent to the period of significance (in 1938), and therefore would have little impact historic fabric associated with the site’s primary resource. Section 106 Finding: The determination of effect for Section 106 would be no adverse effect.	negative, long-term impact on the historic fabric from modifications to the structure. Modifications would be guided by an historic structures report, and conducted as sensitively as possible. Mitigation measures, such as minimizing the alteration of original fabric as much as practicable, will be undertaken. The addition would be attached via the east façade, which was extant during the period of significance (1901), and therefore would alter historic fabric associated with the site’s primary resource. In addition, the original massing and scale of the site’s primary resource would be altered.	term impact on the historic fabric from modifications to the structure. Modifications would be guided by an historic structures report, and conducted as sensitively as possible. Mitigation measures, such as minimizing the alteration of original fabric as much as practicable, will be undertaken. The elevator would be located in the “infill area,” which was added subsequent to the period of significance (1938) and therefore would have little impact historic fabric associated with the site’s primary resource.
Cumulative Impact: Since the NHS was designated, modifications to the NHS were made to preserve, rehabilitate, and selectively restore the Wilcox House. With the exception of Alternative E, the proposals made in the action alternatives would contribute to an overall incremental improvement in the preservation of the historic structure.					
OPERATIONS					
Fire suppression and electrical systems, and administrative, storage, and	A fire suppression system would be installed and the electrical system upgraded.	A fire suppression system would be installed and the electrical system upgraded;	A fire suppression system would be installed and the electrical system upgraded;	A fire suppression system would be installed and the electrical system upgraded;	A fire suppression system would be installed and the electrical system upgraded;

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
<p>maintenance spaces remain as at present.</p> <p>This would result in major, negative, long-term impact on operations from threats of fire, electrical system overload, inadequately sized administrative and maintenance spaces.</p>	<p>This would result in a major, positive, long-term impact on operations from eliminating the threat of fire and electrical system overload.</p>	<p>administrative offices, storage space, and maintenance space would be adequately sized.</p> <p>This would result in a major, positive, long-term impact on operations from eliminating the threat of fire and electrical system overload, and by providing adequately sized administrative office/storage and maintenance space.</p>	<p>administrative offices, storage space and maintenance space would be adequately sized, and adequate space would be provided for fund-raising opportunities.</p> <p>This would result in a major, positive, long-term impact on operations from eliminating the threat of fire and electrical system overload, and by providing adequate space for administrative offices/storage, maintenance, and fund-raising opportunities.</p>	<p>administrative offices, storage space and maintenance space would be adequately sized, and adequate space would be provided for fund-raising opportunities.</p> <p>This would result in a major, positive, long-term impact on operations from eliminating the threat of fire and electrical system overload, and by providing adequate space for administrative offices/storage, maintenance, and fund-raising opportunities.</p>	<p>administrative offices, storage space, and maintenance space would be adequately sized, and adequate space would be provided for fund-raising opportunities.</p> <p>This would result in a major, positive, long-term impact on operations from eliminating the threat of fire and electrical system overload, and by providing adequate space for administrative offices/storage, maintenance, and fund-raising opportunities.</p>
	<p>The extent of administrative office and storage space would remain as at present, as would spaces for fund-raising and maintenance.</p> <p>This would have a moderate, negative, long-term impact on operations from inadequately sized administrative and maintenance spaces, and limited opportunities for fund-raising.</p>	<p>Fund-raising opportunities would remain as at present.</p> <p>This would result in minor, negative, long-term impact on operations by continuing to limit fund-raising opportunities.</p>			

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
		Two separate structures would need to be staffed, operated, and maintained. Additional and separate fire suppression, electrical, telephone, and HVAC systems would be required, plus staff would be needed to provide a presence in the new structure. This would result in a moderate, negative, long-term impact on operations due to the need to maintain and operate additional, separate facilities.			Two separate structures would need to be staffed, operated, and maintained. Additional and separate fire suppression, electrical, telephone, and HVAC systems would be required, plus staff would be needed to provide a presence in the new structure. This would result in a moderate, negative, long-term impact on operations due to the need to maintain and operate additional, separate facilities.
Cumulative Impact: Since the NHS was designated, modifications to the NHS were made to improve operations of the site. The proposals made in the action alternatives would contribute to an overall incremental improvement in the site operations.					
VISITOR USE AND EXPERIENCE					
No dedicated space would exist for educational programs; the admissions area would continue to be constricted and the gift shop would remain remote from the entrance. This would have a major, negative, long-term impact on visitor use and experience due to inadequate educational facilities,	No dedicated space would exist for educational programs. This would have a moderate, negative, long-term impact on visitor use and experience due to inadequate educational facilities. A central admissions desk would be installed to facilitate visitor flow and the gift	Dedicated space would exist for educational programs; a central admissions desk would be installed to facilitate visitor flow, and the gift shop relocated to be adjacent to the visitor entry. This would have a moderate, positive, long-term impact on visitor use and experience from improved	Adequately sized and dedicated space would be provided for exhibits, educational programs; sufficiently sized admissions area would be provided; and access to the gift shop would be improved. This would have a major, positive, long-term impact on visitor use and experience from	Adequately sized and dedicated space would be provided for exhibits, educational programs; sufficiently sized admissions area would be provided; and access to the gift shop would be improved. This would have a major, positive, long-term impact on visitor use and experience from	Adequately sized and dedicated space would be provided for exhibits, educational programs; sufficiently sized admissions area would be provided; and access to the gift shop would be improved. This would have a major, positive, long-term impact on visitor use and experience from

Alternative A: No Action	Alternative B: Reconfigure Existing Structure	Alternative C: Off-site Facility	Alternative D: New Addition on Carriage House Site (Preferred Alternative)	Alternative E: New Addition on East Side of Structure	Alternative F: New Facility on Non-Historic Portion of NHS
admissions space, and limited gift shop access.	shop relocated to be adjacent to the visitor entry. This would have a moderate, positive, long-term impact on visitor use and experience due to improved admissions space and gift shop access.	admissions space and gift shop access.	adequate interpretive and educational facilities, improved admissions space, and improved gift shop access.	adequate interpretive and educational facilities, improved admissions space, and improved gift shop access.	adequate interpretive and educational facilities, improved admissions space, and improved gift shop access.
Cumulative Impact: Since the NHS was designated, modifications were made to improve visitor use and access. The proposals made in the action alternatives would contribute to an overall incremental improvement to the visitor experience.					
UNIVERSAL ACCESS					
No alterations to the universal access would take place; therefore, this alternative would have no impact on access.	An elevator would be installed in the “infill area” of the house to provide universal access; a new ramp would be constructed to the east entrance of the house, and the 1 st floor restrooms would be made accessible. This would have a major, positive, long-term impact on access.	An elevator would be installed in the “infill area” of the house and in the off-site facility to provide universal access; a new ramp would be constructed to the east entrance of the Wilcox House, and the 1 st floor restrooms would be made accessible. This would have a major, positive, long-term impact on access.	An elevator would be installed in the “infill area” of the house to provide universal access to the majority of the structure and new addition, and the 1 st floor restrooms would be made accessible. This would have a major, positive, long-term impact on access.	An elevator would be installed in the “infill area” of the house to provide universal access to the majority of the structure and new addition, and the 1 st floor restrooms would be made accessible. This would have a major, positive, long-term impact on access.	An elevator would be installed in the “infill area” of the house and in the new facility to provide universal access; a new ramp would be constructed to the east entrance of Wilcox House, and the 1 st floor restrooms would be made accessible. This would have a major, positive, long-term impact on access.
	Access for those in wheelchairs would be separate from the main visitor entry. This would have a moderate, negative, long-term impact on universal access.	Access for those in wheelchairs would be separate from the main visitor entry. This would have a moderate, negative, long-term impact on universal access.	Universal access would be provided at the main visitor entry in the new addition. This would have a moderate, positive, long-term impact on universal access.	Universal access would be provided at the main visitor entry in the new addition. This would have a moderate, positive, long-term impact on universal access.	Universal access would be provided at the main visitor entry at the new facility, but at a separate entry at the Wilcox House. This would have a moderate, positive, and moderate negative long-term impact on

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					universal access.
Cumulative Impact: Since the NHS was designated, modifications were made to improve universal access. The proposals made in all action alternatives would contribute to an overall incremental improvement in universal access to the site.					
TOTALS (all impacts are long-term)					
Negative: Minor: 0 Moderate: 0 Major: 3	Negative: Minor: 1 Moderate: 3 Major: 0	Negative: Minor: 2 Moderate: 2 Major: 0	Negative: Minor: 3 Moderate: 0 Major: 0	Negative: Minor: 3 Moderate: 0 Major: 0	Negative: Minor: 3 Moderate: 2 Major: 0
Positive: Minor: 0 Moderate: 0 Major: 0	Positive: Minor: 2 Moderate: 2 Major: 3	Positive: Minor: 2 Moderate: 1 Major: 4	Positive: Minor: 2 Moderate: 2 Major: 5	Positive: Minor: 2 Moderate: 1 Major: 5	Positive: Minor: 2 Moderate: 1 Major: 5
Conclusion: Of the alternatives considered, alternatives D and E have the fewest and least intensive negative impacts. Both have only minor negative impacts, whereas alternatives B, C, and F had moderate negative impacts and Alternative A has major negative impacts. In addition to sharing the fewest number of negative impacts with Alternative E, Alternative D has the greatest number of positive impacts. Thus, Alternative D was selected as the preferred alternative.					

Impairment of Resources

In addition to determining the environmental consequences of the alternatives, NPS management policies require that potential effects be analyzed to determine whether or not proposed actions would impair the resources of the unit.

The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve resources and values. National park managers must always seek ways to avoid or minimize, to the greatest degree practicable, adverse impacts on the resources and values. However, the laws give the NPS the management discretion to allow impacts on the resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the NPS this management discretion, it is limited by the statutory requirement that the NPS must leave the resources and values unimpaired unless a particular law directly and specifically provides otherwise.

A prohibited impairment is an impact that, in the professional judgment of the responsible manager, would harm the integrity of contributing resources and values. This would include the opportunities that otherwise would be present for the enjoyment of those resources or values. An impact on any contributing resource or value may constitute an "impairment." An impact would be most likely to constitute an impairment if it affected a resource or value whose conservation would be:

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

Impairment might result from NPS activities in managing a park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park.

The team has determined that no impairment of resources and values would occur under any of the action alternatives, because there would be no major adverse impacts on a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Theodore Roosevelt Inaugural National Historic Site, (2) key to the natural or cultural integrity of the site or to opportunities for visitor enjoyment, or (3) identified as a goal in the park's general management plan or other relevant NPS planning documents.

The only alternative under which impairment of resources could possibly occur is the no-action alternative. Under the no-action alternative, the Wilcox House remains at risk from threat of fire, due to the lack of a fire suppression system and due to the potential for electrical system overload.

Environmentally Preferred Alternative

The team has identified Alternative D as the environmentally preferred alternative. The Department of the Interior National Environmental Policy Act (NEPA) regulations 4.10(5) define the environmentally preferred alternative as "the alternative that will best promote the national environmental policy as expressed in NEPA's section 101 and can be characterized as causing the least damage to the biological and physical environment and best protect, preserve, and enhance the nation's historic, cultural, and natural resources." The Council on Environmental Quality's (CEQ) guidance defines it as "...the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources."

After a review of potential impacts to historic resources, visitor use and experience, operations, and universal access, the team concluded that Alternative D best protects contributing resources, while enhancing public access to those resources.

Section 106 Compliance Requirements for Undertakings

An important element of compliance is Section 106 of the National Historic Preservation Act, which requires that federal agencies that have direct or indirect jurisdiction take into account the effect of their undertakings on National Register-listed or eligible properties and allow the Advisory Council on Historic Preservation (ACHP) an opportunity to comment. During the planning process, the National Park Service worked with the New York State Historic Preservation Office (SHPO) and the ACHP to meet requirements of 36 CFR 800 and the September 1995 Programmatic Agreement among the National Conference of State Historic Preservation Officers, the ACHP, and the National Park Service. (The Programmatic Agreement requires the National Park Service to work closely with the SHPO and the ACHP in planning for new and existing national park areas.)

The Programmatic Agreement also provides for a number of exclusions for specific actions that are not likely to have an adverse effect on cultural resources. Such actions may be implemented without further review by the New York SHPO or the ACHP, provided that National Park Service internal review finds that the actions meet certain conditions. Undertakings (as defined in 36 CFR 800) not specifically excluded in the Programmatic Agreement must be reviewed by the SHPO and the ACHP before implementation. Prior to any ground-disturbing action by park managers, a professional archeologist will determine the need for archeological testing or activity. Any such studies would be carried out in conjunction with construction and would meet the needs of the state historic preservation office.

Section 110 of the National Historic Preservation Act requires the National Park Service 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.

The following table identifies actions contained within the plan that will likely require review under Section 106, and the nature of the review.

Section 106 Compliance Requirements

POTENTIAL ACTIONS	COMPLIANCE REQUIREMENTS
Construct new addition and/or facility.	SHPO consultation
Modify portions of Wilcox House interior	SHPO consultation
Upgrade systems in Wilcox House	SHPO consultation

Part Five: Consultation and Coordination

Planning Process

The Amendment process was conducted by a multi-disciplinary team composed of staff from the NPS and the Foundation as well as members of the Foundation Board. In addition, the team consulted with NPS technical advisors in the fields of historic architecture, cultural landscape architecture, collections management, and archeology on an as-needed basis.

The team undertook the following steps to advance the plan:

Identification of planning issues: Team members, with input from staff and board members, undertook a needs assessment to determine what, if any, additional facilities are required at the NHS. The team concluded that a 28.4% increase in space, or approximately 4,300 square feet, is required to adequately operate the NHS. The needs assessment, along with discussions with site staff, formed the basis of the "Purpose and Need for the Master Plan Amendment" section

Identification of data gaps: The team determined that additional information on archeology and on the cultural landscape was needed to advance planning.

To address the need for archeological information, the State University of New York at Buffalo conducted a literature search and field investigation to assess the NHS's prehistoric and historic properties, and to determine if any deposits found would qualify for listing on the National Register. After review of historic maps and literature, and after field excavation, the authors concluded that the deposits found through site excavation fail to qualify for listing on the National Register according to the guidelines presented in the National Register Bulletin and that no further work is recommended for the NHS.

To address the need for cultural landscape information, the NPS Olmsted Center for Historic Landscape Preservation undertook a preliminary review of available materials to determine how the grounds may have looked during the period of significance (1901). The preliminary review revealed that little evidence remains of the appearance of the landscape. The limited number of images that do exist illustrates a landscape with a manicured lawn, mature shade trees, shrubs, and elaborately climbing vines on the front portico. The exact site of the Wilcox garden was not conclusively found; however, it was determined that the most likely location of the garden would have been to the south of the house.

Review of planning foundation: The team reviewed the purpose, significance, and the goals of the NHS to provide the foundation for decision-making in the document.

Development of alternatives: At an on-site workshop, the team developed a range of feasible alternatives to address the facility requirements for the NHS. The alternatives developed at the workshop are described in section two of this document.

At the workshop, as a first step in shaping the environmental assessment, the team conducted an analysis to determine the degree to which the alternatives satisfied the space planning requirements. The analysis concluded that, of the alternatives considered, Alternative D best served the space planning needs in a way that achieved operational efficiency.

Foundation Review: The team solicited input from the Foundation Board at two meetings, one in November 2004 and one in April 2005.

Assessment of alternatives: In consultation with technical advisors, the team conducted an assessment of potential impacts on the pertinent cultural and natural resources associated with the alternatives considered. The conclusion of the environmental assessment is that Alternative D provides sufficient additional interior space with the least impact on the cultural and natural environment and site operations. Therefore, Alternative D has been chosen as the preferred alternative.

Public review: The draft of the Master Plan Amendment / Environmental Assessment is on public review for 30 days. Once the public review period is complete, the planning team will consider any substantive comments received and revise the document as necessary.

Consultation

Consultation and coordination with appropriate federal and state agencies were conducted throughout the preparation of this Amendment. Regarding natural resource issues, the team consulted with the U.S. Fish and Wildlife Service and the New York State Department of Environmental Conservation regarding wetland and wildlife issues. Both agencies concluded that no wetland or wildlife issues were of concern regarding this planning effort. Regarding cultural resources, consultation with the State Historic Preservation Officer (SHPO) was informally initiated on April 15, 2004 with an introduction to the planning effort. An advance copy of the draft Master Plan Amendment / Environmental Assessment was shared with the SHPO in March 2005. Although the SHPO has not yet submitted formal comments, the SHPO has expressed no concern regarding the proposals put forth in the document, and has suggested that, should the preferred alternative be advanced, site managers should consider incorporating the carriage house foundation as a structural or interpretive element in the design of the new addition. A review copy was submitted to the SHPO for formal comments during the public review period.

Regarding historic properties of significance to Indian tribes, consultation with the Seneca Tribal Historic Preservation Office and the Tonawanda Seneca Nation Office was initiated by telephone on February 8, 2005. An advance copy of the draft Master Plan Amendment / Environmental Assessment was shared with the Seneca Nation in March 2005. A review copy was submitted to the Seneca Nation for formal comments during the public review period. This kind of consultation and coordination will continue whenever specific undertakings to implement the Amendment are initiated.

The planning team involved the site's primary partner, the Foundation, at all key stages of the planning process. The Foundation is composed of civic leaders and members of the larger Buffalo community from various backgrounds representing education, finance, community volunteers, site volunteers, law, architecture, construction, public relations, and development. The planning team conducted the needs assessment and developed the alternatives in consultation with the site staff and Foundation Board members. In November 2004, the team presented the alternatives to the Foundation Board to solicit feedback. The Foundation Board was consulted again at a meeting in April 2005. In addition, the Superintendent has kept interested community institutions and organizations informed of the planning process through informal consultation.

Theodore Roosevelt Inaugural NHS functions as a gathering place for the community and a center for civic engagement. In addition to special events and commemorations, the site sponsors special lecture programs on the subject of Theodore Roosevelt, local history and the Victorian era. For example, the site presented the Voting Rights program in collaboration with the African American Historical Association and the League of Women Voters, and the Buffalo's Presidential Connections program that celebrated Buffalo's many past presidential visits and rich heritage. Implementing the recommendations offered in this Amendment will facilitate the site's ability to engage the public, by providing appropriate and accessible space.

List of Preparers

Planning Team

Theodore Roosevelt Inaugural Site Foundation:

Lawrence D. Seymour, Foundation Board President
Molly Quackenbush, Superintendent / Executive Director
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Janice Kuzan, Assistant Director
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National Park Service, Northeast Region:

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Marjorie Smith, Park Planner
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Nancy Woods, Planning and Partnerships, Northeast Region

Appendices

Appendix A: Legislation

Nov. 2 ANSLEY WILCOX HOUSE, NEW YORK P.L. 89-708

"As used in this section, the offenses of burglary, assault with a dangerous weapon, and incest shall be defined and punished in accordance with the laws of the State in which such offense was committed."

Sec. 2. Section 3242, Indians committing certain offenses; acts on reservations, of title 18 of the United States Code⁶⁷ is amended to read as follows:

"§ 3242. Indians committing certain offenses; acts on reservations

"All Indians committing any of the following offenses; namely, murder, manslaughter, rape, carnal knowledge of any female, not his wife, who has not attained the age of sixteen years, assault with intent to commit rape, incest, assault with intent to kill, assault with a dangerous weapon, arson, burglary, robbery, and larceny on and within the Indian country shall be tried in the same courts, and in the same manner, as are all other persons committing any of the above crimes within the exclusive jurisdiction of the United States."

Approved November 2, 1966.

ANSLEY WILCOX HOUSE, BUFFALO, NEW YORK

PUBLIC LAW 89-708; 80 STAT. 1101

[H. R. 2600]

An Act to provide for the acquisition and preservation of the real property known as the Ansley Wilcox House in Buffalo, New York, as a national historic site.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That:

Notwithstanding any other provision of law, the Secretary of the Interior shall, subject to the provisions of section 2 of this Act, acquire on behalf of the United States the real property described in section 3 of this Act, known as the Ansley Wilcox House, which real property is of national historic significance as the place in which Theodore Roosevelt took the oath of office as President of the United States on September 14, 1901, following the assassination of President William McKinley. The Secretary shall provide, in accordance with section 2 of this Act, for the operation and maintenance, at no expense to the United States of such property as a national historic site for the inspiration and benefit of the people of the United States.

Sec. 2. (a) The Secretary shall not obligate or expend any moneys herein authorized to be appropriated for acquisition and restoration of the real property described in section 3, nor shall he establish such property as a national historic site in Federal ownership, unless and until commitments are obtained for donations of funds or services in an amount which in the judgment of the Secretary is sufficient to complete restoration of the property and to operate and maintain it for public benefit.

(b) The Secretary shall determine at the beginning of each fiscal year, beginning the first full fiscal year following the date of enact-

67. 18 U.S.C.A. § 3242.

P.L. 89-708 LAWS OF 89TH CONG.—2ND SESS.

Nov. 2

ment of this Act, whether and to what extent donations of funds or services will be forthcoming for the purposes of subsection (a) of this section. If at any time following the acquisition of the property referred to in the first section of this Act the Secretary finds that during the next full fiscal year donated funds or services will not be forthcoming in amounts sufficient to satisfactorily carry on or complete restoration or to continue the operation and maintenance of the property as a national historic site in Federal ownership he shall, in accordance with such regulations as he may prescribe, dispose of such property at not less than its fair market value, as determined by him. The proceeds received from such disposal shall be credited to the Land and Water Conservation Fund in the Treasury of the United States.

Sec. 3. The real property referred to in the first section of this Act is more particularly described as follows:

All that tract or parcel of land, situate in the city of Buffalo, county of Erie, State of New York, and beginning at a point in the east line of Delaware Avenue distant 110 feet southerly from the southerly line of land of Catharine Marie Richmond, recorded in Erie County clerk's office in liber 247 of deeds at page 167; running thence easterly a distance of 110 feet;

Running thence southerly a distance of 60 feet to a point in the north line of land of Morris Michael, recorded in Erie County clerk's office in liber 531 of deeds at page 335; running thence easterly and along the north line of land of the said Morris Michael 64 feet more or less, and continuing easterly on a line extended from the land of Morris Michael a further distance of 174 feet more or less to the westerly line of Franklin Street; running thence northerly along the westerly line of Franklin Street 110 feet; running thence westerly 134 feet; running thence northerly and parallel with Franklin Street 59.51 feet more or less to a point distant 40 feet more or less easterly from the southeast corner of lands of Amelia Stevenson, recorded in Erie County clerk's office in liber 669 at page 299;

Running thence westerly 40 feet to the southeast corner of lands of the said Amelia Stevenson and continuing westerly in a line along the south line of the land of Catharine Marie Richmond a further distance of 174 feet more or less to the easterly line of Delaware Avenue; running thence southerly along the easterly line of Delaware Avenue 110 feet to the place of beginning.

And being subject to an easement as contained in a lease agreement dated January 6, 1959, between the landlord and the Liberty Bank of Buffalo covering a driveway ramp and automobile parking privileges, together with the right of ingress and egress to Delaware Avenue and Franklin Street, as contained in said lease.

Sec. 4. There is hereby authorized to be appropriated not more than \$250,000 for the acquisition and not more than \$50,000 for the restoration of the real property described in section 3 of this Act.

Approved November 2, 1966.

PUBLIC LAW 95-625—NOV. 10, 1978

92 STAT. 3467

Public Law 95-625
95th Congress

An Act

To authorize additional appropriations for the acquisition of lands and interests
in lands within the Sawtooth National Recreation Area in Idaho. Nov. 10, 1978
[S. 791]

*Be it enacted by the Senate and House of Representatives of the
United States of America in Congress assembled,*

National Parks
and Recreation
Act of 1978.

SHORT TITLE AND TABLE OF CONTENTS

SECTION 1. This Act may be cited as the "National Parks and Recreation Act of 1978". 16 USC 1 note.

TABLE OF CONTENTS

- Sec. 1. Short title and table of contents.
Sec. 2. Definition.
Sec. 3. Authorization of appropriations.

TITLE I—DEVELOPMENT CEILING INCREASES

- Sec. 101. Specific increases.
Agate Fossil Beds National Monument.
Andersonville National Historic Site.
Andrew Johnson National Historic Site.
Biscayne National Monument.
Capitol Reef National Park.
Carl Sandburg Home National Historic Site.
Cowpens National Battlefield Site.
De Soto National Memorial.
Fort Bowie National Historic Site.
Frederick Douglass Home, District of Columbia.
Grant Kohrs Ranch National Historic Site.
Guadalupe Mountains National Park.
Gulf Islands National Seashore.
Harper's Ferry National Historical Park.
Hubbell Trading Post National Historic Site.
Indiana Dunes National Lakeshore.
John Muir National Historic Site.
Lands in Prince Georges and Charles Counties, Maryland.
Longfellow National Historic Site.
Pecos National Monument.
Perry's Victory and International Peace Memorial.
San Juan Island National Historical Park.
Sitka National Historical Park.
Statue of Liberty National Monument.
Thaddeus Kosciuszko Home National Historic Site.
Tuskegee Institute National Historic Site.
Whiskeytown-Shasta-Trinity National Recreation Area.
William Howard Taft National Historic Site.
Wilson's Creek National Battlefield.

TITLE II—ACQUISITION CEILING INCREASES

- Sec. 201. Acquisition ceilings.
Big Cypress National Preserve.
Buffalo National River.
Cumberland Island National Seashore.
Sec. 202. Sawtooth National Recreation Area.

**FROM YOUR
CONGRESSMAN HENRY J. NOWAK**

92 STAT. 3520

PUBLIC LAW 95-625—NOV. 10, 1978

16 USC 460l-8. (b) The third sentence of such section 6(f)(7) of such Act is amended by striking out the period and inserting in lieu thereof "by no later than March 1 of each year."

HELLS CANYON NATIONAL RECREATION AREA

16 USC 460gg. SEC. 607. The words "September 1975" in section 1(b) of the Act of December 31, 1975 (Public Law 94-199), are deleted and replaced with the words "May 1978," to clarify that the boundary between Saulsberry and Freezeout Saddles is the hydrologic divide.

IRVINE COAST-LAGUNA, CALIFORNIA STUDY

16 USC 1a-5
note.

SEC. 608. (a) In order to consider preserving in its natural condition, the Irvine Coast-Laguna area, California from Newport Beach to Laguna Beach as generally depicted on the map entitled "Irvine Coast-Laguna Study Area", numbered IRV-90,000, and dated June 1978, and in order to consider protection of the area's unique ecology and topography, its watershed and marine environment, and public outdoor recreation opportunities, the Secretary shall study, investigate, and formulate recommendations on the feasibility and desirability of establishing such area as a unit of the National Park System, such as a park, recreation area, or seashore. The Secretary shall consult with other appropriate Federal agencies, as well as with the appropriate State and local bodies and officials involved, and shall coordinate the study with applicable local and State plans and planning activities relating to the area. Federal departments and agencies are authorized and directed to cooperate with the Secretary and, to the extent permitted by law, to furnish such statistics, data, reports, and other material as the Secretary may deem necessary for purposes of the study.

Consultation and
coordination.

Report to
President and
Congress.

(b) The Secretary shall submit to the President and the Congress of the United States, within six months after the date of enactment of this section, a report of his findings and recommendations. The report of the Secretary shall contain, but not be limited to, findings with respect to—

(1) the scenic, scientific, natural, and outdoor recreation values of the Irvine Coast-Laguna area;

(2) the type of Federal, State, and local programs that are feasible and desirable in the public interest to preserve, develop, and make accessible for public use the values identified; and

(3) the relationship of any recommended national park, recreation area, or seashore area to existing or proposed Federal, State, and local programs to manage in the public interest the natural resources of the entire Irvine Coast-Laguna area.

Appropriation
authorization.

(c) There is hereby authorized to be appropriated \$50,000 to carry out the provisions of this section.

THEODORE ROOSEVELT INAUGURAL NATIONAL HISTORIC SITE

80 Stat. 1101. SEC. 609. The first section of the Act entitled "An Act to provide for the acquisition and preservation of the real property known as the Ansley Wilcox House in Buffalo, New York, as a national historic site", approved November 2, 1966 (Public Law 89-708), is amended by striking out "at no expense to the United States" and inserting in lieu thereof "at no direct operating expense to the Department of the Interior,".

PUBLIC LAW 96-607—DEC. 28, 1980

94 STAT. 3541

TITLE VIII

THEODORE ROOSEVELT INAUGURAL NATIONAL HISTORIC SITE

SEC. 801. The first two sections of the Act entitled “An Act to provide for the acquisition and preservation of the real property known as the Ansley Wilcox House in Buffalo, New York, as a national historic site”, approved November 2, 1966 (Public Law 89-708), are amended to read as follows: “That, notwithstanding any other provision of law, the Secretary of the Interior shall acquire on behalf of the United States the real property described in section 3 of this Act, known as the Ansley Wilcox House, which real property is of national historic significance as the place in which Theodore Roosevelt took the oath of office as President of the United States on September 14, 1901, following the assassination of President William McKinley. Such property is hereby designated as the Theodore Roosevelt Inaugural National Historic Site.

Ansley Wilcox
House,
acquisition.
16 USC 461 note.

“SEC. 2. (a) Notwithstanding any other provision of law, the property referred to in the first section of this Act shall be administered by the Secretary of the Interior, acting through the National Park Service, in accordance with this section and provisions of law generally applicable to units of the National Park System, including the Act entitled ‘An Act to establish a National Park Service, and for other purposes’, approved August 25, 1916 (39 Stat. 535; 16 U.S.C. 1,

2-4), and the provisions of the Act entitled ‘An Act to provide for the preservation of historic American sites, buildings, objects, and antiquities of national significance and for other purposes’, approved August 21, 1935 (49 Stat. 666; 16 U.S.C. 461-7).

“(b) The Secretary of the Interior shall enter into cooperative agreements with the Theodore Roosevelt Inaugural Site Foundation or other qualified public or private entities for the operation, maintenance, management, development, and interpretation of the Theodore Roosevelt Inaugural National Historic Site.

“(c) Notwithstanding any other provision of law, the Department of the Interior share in any fiscal year of the annual operating costs of the Theodore Roosevelt Inaugural National Historic Site shall not exceed two-thirds of such operating cost.”.

Appendix B: List of Classified Structures

Structure Number	LCS ID	Preferred Structure Name	National Register Status	Management Category	Management Category Date	Treatment
HS1	022696	Ansley Wilcox House	Entered – documented	Must be preserved and maintained	2/14/95	Rehabilitation with selected spaces restored
HR-01	040630	Carriage Drive	Determined eligible – SHPO	Must be preserved and maintained	2/14/95	Rehabilitated
HR-02	040631	Sandstone Sidewalk	Determined eligible – SHPO	Must be preserved and maintained	2/14/95	Preserved
HS/S-0	040632	Bluestone Steps	Determined eligible – SHPO	Must be preserved and maintained	2/14/95	Preserved
HS/S-02	040633	Front Lawn Retaining Wall	Determined eligible – SHPO	Must be preserved and maintained	2/14/95	Preserved

Appendix C: Glossary

accessibility—The provision of park programs, facilities, and services in ways that include individuals with disabilities, or makes available to those individuals the same benefits available to persons without disabilities. See also, *universal design*. Accessibility also includes affordability and convenience for diverse populations.

archeological resource—Any material remains or physical evidence of past human life or activities which are of archeological interest, including the record of the effects of human activities on the environment. An archeological resource is capable of revealing scientific or humanistic information through archeological research.

archeological site—Any place where there is physical evidence of past human occupation or activity. Physical evidence may consist of artifacts, such features as agricultural terraces and hearths, structures, trash deposits, or alterations of the natural environment by human activity.

consultation—A discussion, conference, or forum in which advice or information is sought or given, or information or ideas are exchanged. Consultation generally takes place on an informal basis. Formal consultation is conducted for compliance with section 106 of National Historic Preservation Act, National Environmental Policy Act, and with Native Americans.

critical habitat—Specific areas within a geographical area occupied by a threatened or endangered species which contain those physical or biological features essential to the conservation of the species, and which may require special management considerations or protection; and specific areas outside the geographical area occupied by the species at the time of its listing, upon a determination by the Secretary of the Interior that such areas are essential for the conservation of the species.

cultural landscape—A geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or esthetic values. There are four non-mutually exclusive types of cultural landscapes: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes.

cultural resource—An aspect of a cultural system that is valued by or significantly representative of a culture, or that contains significant information about a culture. A cultural resource may be a tangible entity or a cultural practice. Tangible cultural resources are categorized as districts, sites, buildings, structures, and objects for the National Register of Historic Places, and as archeological resources, cultural landscapes, structures, museum objects, and ethnographic resources for National Park Service management purposes.

enabling legislation—Laws which authorize units of the national park system.

environmental assessment (EA)—A concise public document prepared by a federal agency to satisfy the requirements of the National Environmental Policy Act of 1969, as amended. The document contains sufficient analysis to determine whether the proposed action (1) constitutes a major action significantly affecting the quality of the human environment, thereby requiring the preparation of an environmental impact statement, or (2) does not constitute such an action, resulting in a finding of no significant impact being issued by the agency.

geologic resources—Features produced from the physical history of the Earth, or processes such as exfoliation, erosion and sedimentation, glaciation, karst or shoreline processes, seismic, and volcanic activities.

interpretation—As used in the National Park Service, interpretation includes publicity, explanation, information, education, philosophy, etc. Early National Park Service interpretation went by the name of education or nature study; today it includes historical and recreational resources. The term “interpretation” is still not well understood by the public.

lightscapes (natural ambient)—The state of natural resources and values as they exist in the absence of human-caused light.

massing—The overall volume and dimension of a structure in the landscape.

mitigating measures—Modification of a proposal to lessen the intensity of its impact on a particular resource.

Organic Act (National Park Service)—The 1916 law (and subsequent amendments) that created the National Park Service and assigned it responsibility to manage the national parks.

preservation—The act or process of applying measures to sustain the existing form, integrity, and material of a historic structure, landscape, or object. Work may include preliminary measures to protect and stabilize the property, but generally focuses on the ongoing preservation, maintenance, and repair of historic materials and features rather than extensive replacement and new work. For historic structures, exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.

rehabilitation—The act or process of making possible an efficient, compatible use for a historic structure or landscape through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, and architectural values.

restoration—The act or process of accurately depicting the form, features, and character of a historic structure, landscape, or object as it appeared at a particular period of time by means of removing features from other periods in its history and reconstructing missing features from the restoration period.

soundscape—Ambient sounds as they exist in the absence of human-caused sounds.

stewardship—The cultural and natural resource protection ethic of employing the most effective concepts, techniques, equipment, and technology to prevent, avoid, or mitigate impacts that would compromise the integrity of park resources.

strategic plan—A National Park Service five-year plan, which lays out goals and management actions needed in the near term to implement the general management plan.

universal design—The design of products and environments to be usable by all people to the greatest extent possible, without the need for adaptation or specialized design.

viewshed—The area that can be seen from a particular location, including near and distant views.

visitor—Anyone who uses a park's interpretive, educational, or recreational services.

Appendix D: Selected Resources Consulted

- Bargmann, Hendrie, + Archetype, Inc. 1999. Assessment Study for the Upgrade of General Usage; Programmatic Functioning; Handicapped Accessibility; and Lighting and Mechanical Systems.
- New York Department of Environmental Conservation. 2005. Letter to M. Smith regarding presence of threatened and endangered species.
- Schneider Design, Architects, P.C. 2004. Planning Resource Document for Proposed Carriage House Addition and Interior Modifications to the Wilcox Mansion.
- State University of New York at Buffalo. 2004. Phase 1A Literature Search & Sensitivity Assessment of the Theodore Roosevelt Inaugural National Historic Site Ansley Wilcox Carriage House, City of Buffalo, Erie County, New York.
- State University of New York at Buffalo. 2004. End of Field Letter for the Phase 1B/2 Theodore Roosevelt Inaugural National Historic Site Examination.
- Theodore Roosevelt Inaugural Site Foundation. 2004. Fiscal Year 2004 Annual Performance Plan for Theodore Roosevelt Inaugural National Historic Site.
- Theodore Roosevelt Inaugural Site Foundation. 2004. Strategic Plan: 2003–2006.
- U.S. Department of the Interior, National Park Service. 1967. A Master Plan Report for Ansley Wilcox House National Historic Site, Buffalo, New York.
- U.S. Department of the Interior, National Park Service. 1969. Historic Structures Report, Part II: Ansley Wilcox House National Historic Site, Buffalo, New York.
- U.S. Department of the Interior, National Park Service. 1995. *The Secretary of the Interior's Standards for Treatment of Historic Properties*.
- U.S. Department of the Interior, National Park Service. 1998. Director's Order # 28: *Cultural Resource Management Guidelines*.
- U.S. Department of the Interior, National Park Service. 1999. Scope of Collections Statement: Theodore Roosevelt Inaugural National Historic Site, Buffalo, New York
- U.S. Department of the Interior, National Park Service. 2000. *2001 Management Policies*. December 2000.
- U.S. Department of the Interior, National Park Service. 2001. Director's Order # 12: Conservation Planning, Environmental Impact Analysis, and Decision Making.
- U.S. Department of the Interior, U.S. Fish and Wildlife Service. 2005. Letter to M. Smith regarding presence of threatened and endangered species.