



## **FINDING OF NO SIGNIFICANT IMPACT**

### **Blow-Me-Down Farm Site Management Plan**

#### **Saint-Gaudens National Historic Site Cornish, New Hampshire**

### **INTRODUCTION**

Saint-Gaudens National Historic Site (NHS) acquired the Blow-Me-Down Farm in March of 2010 via donation from the Saint-Gaudens Memorial, the park's non-profit partner. Acquisition of the Blow-Me-Down Farm (the Farm) was suggested in the park's 1996 General Management Plan (GMP). The NPS undertook the development of a site management plan as the much needed first step in the process of rehabilitating the Farm's structures and creating a long-term strategy to protect and maintain the Farm's cultural and natural resources. The purpose of the site management plan is to further define appropriate NPS and visitor uses for the newly acquired Farm beyond those listed in the GMP for Saint-Gaudens NHS and to preserve the deteriorating structures located at the Farm. The objectives are to:

- Determine appropriate visitor, park, and partner uses for the Farm.
- Expand the park's interpretive program to include the story of the Cornish Colony and fulfill the park's purpose.
- Relieve the stress on historic structures and curatorial and maintenance facilities within the historic core of the park.

The NPS completed a Site Management Plan / Environmental Assessment (plan/EA) that evaluated two alternatives and the impacts, or environmental consequences, of implementing each of the alternatives on a variety of resources. The plan/EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended; the regulations of the Council on Environmental Quality (40 CFR 1500-1508); and the NPS Director's Order #12: *Conservation Planning, Environmental Impact Analysis, and Decision Making* (DO-12, 2011) and accompanying DO-12 Handbook (NPS 2001).

### **SELECTED ALTERNATIVE**

Based on the analysis presented in the Site Plan/EA, the NPS has selected Alternative B – The Cornish Colony History and Art Center for implementation. The selected alternative is described in Chapter 2: Alternatives of the EA (pages 2-1 through 2-3 and 2-5 through 2-12).

The intent of the selected alternative is to provide for the long-term preservation of Blow-Me-Down Farm while expanding the visitor experience which is currently constrained by facility and historic preservation limitations within the historic core of the park. In addition to the life and works of Augustus Saint-Gaudens, this alternative will focus on preserving resources associated with the Cornish Colony and interpreting the lives, works, and significance of the members of the colony. Visitors will receive a larger glimpse into Saint-Gaudens's social life and learn more about the artists he influenced and those who influenced him.

Implementation of this alternative is strongly dependent upon raising the necessary funds from outside sources and the cultivation of strong partnerships to augment what minimal federal funding is available. For these reasons, Saint-Gaudens NHS will look to collaborate with partners and others to protect the Farm's historic resources and offer effective arts and/or history programming to the visiting public, scholars, and other interested parties. The park will use a two-part phasing approach to prioritize goals for key elements and develop an implementation sequence that allows for the greatest flexibility of use, preservation of resources, and enhancement of the visitor experience. More specific phasing information is provided under each planning topic description.

***Phase 1*** – Occurs within the first seven years following the issuance of this FONSI for the selected alternative. During Phase 1, the park will proactively seek grants and cost-share opportunities, strengthening existing partnerships and developing new partnerships for undertaking needed preservation and rehabilitation or restoration of the Farm's historic structures. The park may also pursue leasing or cooperative agreement opportunities that would bring uses to the Farm that directly relate to the park's purpose and significance including: art, history, and natural resource education programs; artist-in-residence programs; museums; or other programs which provide educational opportunities in the fields of art, art history, historic preservation, public lands management, or natural resources. In addition, the park may proactively pursue short-term leasing of different areas or structures of the farm for special events. These short-term leases will not be limited to uses related to the park's purpose and significance, but can include any appropriate party or event, such as weddings or banquets, upon NPS approval.

***Phase 2*** – Begins in the eighth year following implementation of the selected alternative and will continue as the management strategy for the Farm, provided the goals laid out in Phase 1 are not obtained. The intent of Phase 2 is to increase the likelihood of Saint-Gaudens NHS finding suitable occupants to assist in stabilizing and/or rehabilitating the Farm's structures in the event that the goals of Phase 1 prove untenable. In the event that efforts identified under Phase 1 to raise funds through grants and partnerships have not shown significant headway by the eighth year, Phase 2 will permit the park to expand acceptable uses of the Farm beyond those which directly support the park's purpose and significance. Under Phase 2, the park will consider any proposal for use (public or private), provided the proposal meets NPS leasing regulations.

Lease agreements under Phase 1 and Phase 2, can be created for an entire structure, part of a structure, multiple structures, a portion of the Farm's grounds, the entire Farm, or any

combination of the above. Leases can also be created for public or private use which could limit NPS programming and public access.

## **Access and Circulation**

***Phase 1*** – The park will use the rehabilitated Dance Hall to incorporate new programming and allow for some public access to the Farm during park operating hours. If funding becomes available, or if appropriate lease agreements are created, preservation and rehabilitation efforts can allow for additional structures to be open for public access once they have been secured and made safe for use. Unless the lease is renegotiated or permission is granted by the tenant, the public will not be granted access to the agriculturally-leased fields in order to protect the lessee's interests and the safety of visitors.

The historical entrance directly opposite the Blow-Me-Down Mill will remain closed due to poor sightlines, and the farm access drive will remain the main entrance. New entrance signage will be installed and the park will work with the town of Cornish and the New Hampshire Department of Transportation for additional roadway/approach signage along New Hampshire NH Route 12A. The park will continue to plow snow for emergency purposes during the off-season. If the Farm is leased for year-round use, the park will coordinate snow removal with the lessee through agreements and/or the terms of the lease. The existing paved parking area, between the Casino and Dance Hall, will be resurfaced, as needed, to provide accessible parking, but the majority of visitors and staff will continue to park in open lawn areas designated by the park. Depending on the level of use, new parking areas may be created in locations outside of the Farm's developed cluster.

The 2009 draft Blow-Me-Down Mill Cultural Landscape Report (CLR) identified treatment options for the Blow-Me-Down Mill and surrounding landscape, including access and circulation improvements to and from the Mill and Pond. Treatments for the landscape will include the following elements which are described in detail below:

- redesign Mill parking area;
- install additional interpretive waysides and directional signage;
- provide accessible pathways to the Mill and to a viewing area for the dam; and
- install trails to improve circulation around the Pond and connect to the existing park trail system.

***Redesign Mill parking area*** – The existing Mill parking area will be shifted further away from the Pond edge. The proposed parking area will be clearly defined with up to four delineated spaces, plus an overflow area, and may be treated with gravel chipseal, turf block, or other appropriate paving material. In addition, the parking access drive will be redesigned to provide better sightlines to NH Route 12A.

***Provide accessible pathways to the Mill and to a viewing area for the dam*** – An accessible pedestrian circulation route will be constructed from the parking area to the Mill. The walkway may be constructed along the existing pipe rail fence, constructed of a hardened surface, and

shall blend with the existing historic features. The walkway grade shall meet Americans with Disability Act (ADA) codes and be approximately four feet wide.

*Install trails to improve circulation around the Pond and connect to the existing park trail system* – A stable, universally accessible walkway is needed to connect the mill building with the stone arch bridge, extending approximately another 150 feet from the dam viewing area described above. The walkway should have a hard, compacted surface and may require retaining walls due to the steep slope of the road shoulder. A mowed grass path could continue to be mowed from the stone arch bridge to connect to the existing Blow-Me-Down Trail. A second mowed grass path could extend to the north end of the meadow along the pond bank.

Existing circulation routes will be expanded to the Farm. A new trail system can be developed that would cross NH Route 12A through the culvert under the stone arch bridge, or with a road crossing located at the Farm's entrance. The park will work with all appropriate local, state, and federal agencies for scoping, design, and approval of the road crossing. Rustic trails can extend from the Farm's existing driveway/trail system to the Connecticut River. Trails would be created by means of mowed grass through open field areas and hard-packed soil through forested areas. The proposed trail network will be designed to avoid sensitive natural and cultural resources.

***Phase 2*** – Under Phase 2, the park will continue to improve access and circulation as described under Phase 1 if portions of the Farm are used to accomplish the park's purpose and public access is acceptable under the terms of any current lease. If, however, the Farm is leased for private use under Phase 2, and public access is not permitted as part of a lease agreement, then the park will not continue to pursue any additional access and circulation improvements listed under Phase 1 above. Under the latter scenario, the park will coordinate access and circulation needs with the lessee through agreements and/or the terms of the lease.

## **Interpretation and Visitor Experience**

***Phase 1*** – Primary visitor services will continue to operate in the historic core, but additional staffing may be provided at the Farm to orient the visitor. The interpretive focus for visitors in the historic core of the park will continue to be Augustus Saint-Gaudens, while the visitor experience at the Farm will focus on arts in general and the history of the Cornish Colony: how it was established, who the artists were, how the colony related to external political and social events, etc. Permanent exhibit space can be dedicated to the Cornish Colony and other classically-influenced artworks while revolving exhibits can showcase the artwork by, or objects associated with, individual artists who formed the Cornish Colony. Interpretive waysides will be installed in selected areas to provide visitors with additional information about Blow-Me-Down Farm and the Cornish Colony.

The park will work with existing and new partners and others to expand on its current educational programs by providing classroom and meeting space at the Farm. Workshops, classes, lectures, and instruction may move beyond sculpture to any of the wide range of artistic mediums used by the Cornish Colony artists. Additionally, the Farm may become a site for research and learning about arts in general or the Cornish Colony in particular. An artist-in-

residence program may also be extended to the Farm. The chosen artist can work on his/her project at the Farm during the park's open season. Artists may interact with visitors, answer questions about their artwork, and hold workshops teaching visitors or students how to use their medium. Studio space for these artists may be developed in several different buildings at the Farm.

Passive recreational uses and special events may be moved from the historic core of the park to the Farm. An area of the Farm may be developed as a concert venue. Outdoor spaces or portions of existing buildings may be adaptively reused as special event staging areas. Under Phase 1, visiting artists wishing to use the park as their artistic inspiration may be provided access to the Farm during normal hours of operation to practice their artwork under the same guidelines used for the historic core of the park.

***Phase 2*** – Under Phase 2, the park will continue to expand interpretive and visitor uses of the Farm as described under Phase 1 if portions of the Farm are used to accomplish the park's purpose and public access is acceptable under the terms of any current lease. If, however, the Farm is leased for private use under Phase 2, and public access is not permitted as part of a lease agreement, then the park will not continue to pursue any opportunities to expand the interpretive programming and visitor use at the Farm as listed under Phase 1 above.

## **Resource Management and Protection**

***Phase 1*** – Saint-Gaudens NHS will focus on stabilization and repair of the Farm's structures as federal funding becomes available. Structures will remain closed to the public until these stabilization efforts are completed and the NPS deems them safe for public use. In addition to limited federal funding, the NPS will look to partners and others for donations, cost-sharing arrangements, or leasing opportunities with the intent of rehabilitating structures for uses related to the park's purpose and significance.

As structural improvements are made, visitor and operational uses will be incorporated into structures. Specific uses which would be suitable for each structure at the Farm during Phase 1 include: administrative uses, park operations, and interpretive or educational programming related to the park's purpose and significance. Proposed structural uses are not necessarily mutually exclusive; several different structures can be suited for the same use and compatible uses can be included within the same structure. Over the course of time, uses may shift from one structure to another or be combined differently within the same structure depending upon programmatic needs.

While the level of rehabilitation efforts can vary depending on needs and the type of use specified for each structure, the 2011 Blow-Me-Down-Farm Condition Assessment Report would be used to identify improvements needed to fully stabilize and preserve each of the Farm's structures, while the 2009 Blow-Me-Down Mill Historic Structure Report (HSR) will be used to guide interior and exterior rehabilitation efforts for the Mill. Some or all of the improvements could be made either by the NPS or through lease agreements.

Utility improvements will be required before any permanent visitor or operational uses are implemented. Electrical systems will need to be inspected and upgraded or replaced as needed. Existing plumbing lines serving the Casino and Chauncey Cottage will need to be inspected and upgraded as needed. All other structures will require plumbing installations if needed for their chosen use. The existing well supplying water to the Casino will need to be inspected, but it is thought to be in safe, working order. A new well will be installed for the Chauncey Cottage to replace the existing spring-fed water system which is failing. The two existing septic systems are failing and must be replaced. The park will continue to bring in portable restroom facilities as needed for special events until improvements to permanent facilities are completed. In addition, fire detection, fire suppression, and security systems will need to be upgraded throughout the Farm complex. All plumbing and electrical work will be completed to meet current code requirements.

The Farm's cultural landscape can be rehabilitated to its period of significance. Until funding becomes available for rehabilitation efforts, the park will continue to mow the Farm's existing lawns and fields on an as-needed basis. As uses are phased onto the Farm, the park or tenants will need to mow on a more regular basis in areas of frequent use. The park may allow areas further away from the core of the Farm's structures to revert to meadow, mowing only as needed to control overgrowth and invasive species. Dead trees and tree debris will be removed and replaced, if needed, to maintain the cultural landscape. As with Alternative A, vegetation will continue to be removed along certain areas of the Connecticut River to maintain existing views to Mount Ascutney and the Connecticut River. Saint-Gaudens NHS will continue to lease the lower terrace and a portion of the upper terrace for agricultural purposes. An existing agricultural lease is in place for these locations until 2029.

The majority of the park's collections will be held and maintained within the existing collections storage facility. Research documents or other research materials may be relocated to the farm for use by visiting researchers if buildings are upgraded to museum standards. As indicated above, some space may be created in the Farm's structures to store or display collections and non-collections objects that would be used for interpretation or research purposes at the Farm. If other uses are moved from the historic core of the park to the Farm's structures, the park may also incorporate collections and non-collections storage space into the vacated spaces within the historic core of the park. The park will continue to seek funding to create additional environmentally appropriate exhibit space in both the historic core and the Farm.

***Phase 2*** – Under Phase 2, management strategies for the Farm's historic structures will be the same as under Phase 1. Any new lease created under the Phase 2 will require rehabilitation efforts which will be overseen by the park. Structures which remained vacant moving into Phase 2 will continue to receive stabilization and preservation maintenance from the park as funding becomes available. The park will continue to maintain views of the Connecticut River under Phase 2 and the use of agricultural leases will continue for the lower terraces of the Farm.

Under Phase 2, rehabilitation of the Farm's cultural landscape and management strategies for the park's collections will depend on the terms of any lease in place for the Farm. If portions of the Farm are used to accomplish the park's purpose and public access is permitted, some or all of the landscape rehabilitation can occur and new storage and/or exhibit space can be created if those

actions do not conflict with existing leases. If, however, the Farm is leased for private use under Phase 2, then the park may not continue to pursue any additional landscape rehabilitation or collections exhibit or storage strategies listed under Phase 1 above. Under the latter scenario, the park will coordinate landscape maintenance needs with the lessee through agreements and/or the terms of the lease and collections management strategies will remain unchanged.

## **Park Operations**

**Phase 1** – Some park administrative and/or park operations offices may be relocated to the Farm if funding permits the rehabilitation of structures for those uses. Primary curatorial and maintenance work and storage spaces will remain in their existing facilities adjacent to the historic core of the park, but satellite work and storage space may be created in structures at the Farm. Tenants will be responsible for rehabilitation and maintenance of leased structures. The park will be responsible for maintenance of any structures and areas of the Farm not under a lease agreement as well as overseeing rehabilitation and maintenance efforts by lessees.

**Phase 2** – Under Phase 2, the park will continue park operations management as described under Phase 1 if the expansion of administrative offices and storage space do not conflict with any lease agreements. If, however, the Farm is leased for private use under Phase 2, then the park will not create additional administrative offices or create additional work or storage space at the Farm.

## **Partnerships and Cooperative Actions**

**Phase 1** – During Phase 1, the park may engage with existing partners and seek additional partners to work in collaboration with the park to rehabilitate Farm structures, or portions of structures, for uses related to the park's purpose and compatible with the ideas described under the general description of Phase 1 above. The NPS will seek leasing agreements with interested parties by which the lessee will rehabilitate and maintain the structure to meet the needs of their proposed use. The cost incurred by the lessee to rehabilitate a structure can be offset by the rental rate as specified in the lease agreement. Saint-Gaudens NHS will oversee rehabilitation efforts to ensure that all work is completed to current NPS standards.

**Phase 2** – After seven years (Phase 1), Saint-Gaudens NHS will open the leasing or cooperative agreement program to public or private users wishing to rehabilitate a structure, portion of a structure, area of the Farm, or the entire Farm. Proposed uses will need to be approved by the park and need to meet NPS standards and policies. Lessees will be responsible for rehabilitating and maintaining the structure to meet their needs. As with Phase 1, the NPS will work with the lessee to set the terms by which rehabilitation costs can be offset by reduced or waived rental rates. As with Phase 1, Saint-Gaudens NHS will oversee rehabilitation efforts to ensure that all work is completed to current NPS standards.

## **OTHER ALTERNATIVES CONSIDERED**

The plan/EA prepared for this project also analyzed Alternative A – Continuation of Current Management under which the NPS would respond to the future needs and conditions associated with the management and use of the Farm without major changes to the present course of action. With Alternative A, day-to-day access to the Farm would continue to be limited to NPS staff, agricultural lessees, and emergency vehicles. The Farm would only be open to visitors for special events and meetings, but visitor services and day-to-day interpretive and education visitor opportunities would occur within the historic core of the park. Rehabilitation efforts for the Dance Hall and Blow-Me-Down Mill building and landscape would occur as funding permits, but only emergency stabilization efforts would occur for the remaining Farm structures.

Alternative A – Continuation of Current Management was not selected for implementation because it did not offer the greater degree of resource protection or visitor use opportunities. In addition, the alternative did not meet the objectives of providing the park with a means of expanding interpretive programming to include the story of the Cornish Colony or helping to relieve stress on the park's historic structures, curatorial or maintenance facilities.

### **Alternative Elements Considered but Dismissed**

The following alternative elements were considered during the planning process but were dismissed from further analysis:

#### *The Farm as the Primary Visitor Center*

The 1996 GMP for Saint-Gaudens NHS suggested using the Farm as the primary visitor contact station with a shuttle system being incorporated to drive visitors to the historic core of the park. Saint-Gaudens NHS constructed a new visitor center in the historic core of the park in 2002, before the Farm was acquired, eliminating the need for a visitor center on Blow-Me-Down Farm. Additionally, the park does not receive a large enough number of annual visitors to warrant the cost of operating and maintaining a shuttle system. For these reasons, an alternative including the Farm as a primary visitor center was eliminated from further consideration.

#### *Residential Arts School*

During public scoping, the park received a suggestion for using the Farm as a residential arts school in which Saint-Gaudens NHS would be responsible for rehabilitating the Farm's structures for classroom and dormitory use. Students would attend a series of art classes, held at various locations throughout the park, while residing in the Farm's Casino. Classes would be administered by a partner group with assistance from the park. The cost of rehabilitating the Casino for dormitory use to NPS standards was estimated to be around \$2.5 million. Due to financial constraints within the NPS and federal government, this alternative was dismissed as infeasible. This option, however, could fit within the constraints of Alternative B, Phases 1 and 2, if funding were available from an outside source or an outside entity wished to lease the Farm for the purpose of creating a residential arts school.



### *The Barn as Art Studio Space*

Throughout the scoping process, Saint-Gaudens NHS received several requests to convert the Farm's Barn into studio space for artists. The Barn, as it exists today, is a shell building with no utilities or other amenities in place. The cost to rehabilitate the Barn, including adding water and electric, is estimated to be more than \$1 million. As with the residential arts school proposal above, financial constraints within the NPS and federal government make this option infeasible for the park to complete using federal funding alone. This option, however, could fit within the constraints of Alternative B, Phases 1 and 2, if funding were available from an outside source or an outside entity wished to lease the Farm for the purpose of creating studio space within the Barn.

### *The Blow-Me-Down Working Farm*

Converting the property into a working farm was considered following suggestions made during public scoping. Under this option, the NPS would create working farm to illustrate agricultural practices used during the Cornish Colony's period of significance as well as educate the public on current sustainable farming practices. While the park's purpose and significance does include telling the story of the Cornish Colony, the focus for the park is the Cornish Colony's influence on art and arts scene across the country, not the agricultural influences of the Cornish Colony. In addition, Saint-Gaudens NHS does not currently possess the equipment or staffing levels necessary to properly manage or maintain a working farm. The nearby Billings Farm and Museum, however, provides visitors with the similar experience of a working farm and agricultural lifestyle. Due to the lack of operational capacity and the close proximity of a similar visitor experience associated with the NPS, this element was dismissed in favor of more feasible options.

### *Subdivision of Property for Mixed Use*

Several proposals submitted during the 2007 Request for Proposals suggested subdividing and selling portions of the Farm for private residences. This alternative element was dismissed from further analysis as it does not meet the objective of this plan to protect the resources of the Farm and provide opportunity to expand on the current visitor experience.

## **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

In accordance with the DO-12 Handbook, the NPS identifies the environmentally preferable alternative in its NEPA documents for public review and comment [Sect. 4.5 E(9)]. The environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some

situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative (43 CFR 46.30).

The selected alternative best protects and preserves the cultural and natural resources of the Farm by creating a management strategy to guide the park in rehabilitating and preserving the Farm's resources while greatly improving visitor safety of the existing structures. This alternative also provides the widest range of opportunities for visitor enjoyment without resource degradation. Based on the analysis of environmental consequences of each alternative in Chapter 4 of the plan/EA, the selected alternative was also chosen as the environmentally preferred alternative.

## **MITIGATION MEASURES**

The NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures will be implemented where feasible. The NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

- Historic Structure Reports (HSR) and Cultural Landscape Reports (CLR) are used by the NPS to document the physical history, current condition, and proposed treatment for historic structures and landscapes. HSRs will be created for the Casino, Dance Hall, Blow-Me-Down Bank Barn, Chauncey Cottage and Garage, Chicken Coop, and Open and Closed Sheds, and a CLR will be created for the Farm's cultural landscape. These reports will be used to guide rehabilitation efforts and future maintenance of the Farm's structures and landscape. Until such time as HSRs and a CLR could be completed, the park will continue to use existing resource documentation while working closely with NPS resource specialists to make maintenance decisions regarding the Farm's resources.
- Where necessary for resource or visitor protection, work areas will be identified with construction fence, silt fence, or similar material prior to any activity. The fencing will define the work zone and confine activity to the minimum area required. All protection measures will be clearly stated in the construction specifications, and workers will be instructed to avoid conducting activities beyond the work zone. Disturbances will be limited to areas inside the designated construction limits. No machinery or equipment will access areas outside the work limits.
- Construction equipment staging will occur within previously disturbed areas as much as possible. All staging and stockpiling areas will be returned to preconstruction conditions following construction.
- Contractors will be required to properly maintain construction equipment (i.e., mufflers and brakes) to minimize noise.
- All disturbed ground will be reclaimed using appropriate best management practices (BMPs) including planting species-appropriate plants.
- Until the soil is stable and vegetation is established, erosion-control measures will be implemented to minimize erosion and prevent sediment from leaving the site.

- Temporary barriers will be provided to protect existing trees and shrubs that are not identified for removal.
- All activities will comply with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716, revised).
- Prior to any soil disturbing activities, a thorough geophysical baseline survey of the property will be conducted and adequate archeological ground truthing of the geophysical anomalies will be done to determine their nature, integrity, and extent.
- Known archeological resources in the vicinity of project activities will be identified and delineated for avoidance prior to project work.
- The park will continue to coordinate with the SHPO throughout the course of the project to protect and mitigate cultural resources affected by the selected alternative.
- Should any archeological resources be uncovered during construction, as appropriate, work will be halted in the area and the park archeologist, SHPO, and appropriate Native American tribes (if applicable) will be contacted for further consultation.
- NPS cultural resource staff will be available during construction to advise or take appropriate actions should any archeological resources be uncovered during construction. In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed.
- NPS will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archeological sites or historic properties. Contractors and subcontractors also will be instructed on procedures to follow in case previously unknown archeological resources are uncovered during construction.
- Visitors will be informed in advance of construction activities via the park website and visitor center.

## **WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As defined in 40 CFR § 1508.27, significance is determined by examining the following criteria:

***1) Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS.***

As described in the plan/EA, both beneficial and adverse impacts to the resources analyzed could result from the actions proposed, however, no significant impacts were identified that will require analysis in an EIS. The selected alternative will result in beneficial and adverse impacts on historic structures, museum collections, state-listed species, and visitor use and experience; beneficial impacts on cultural landscapes, park operations, and gateway communities. As described in chapter 4 of the plan/EA, none of these impacts will be significant. On balance, the selected alternative will have a beneficial impact.

***2) The degree to which public health and safety are affected.***

The selected alternative has some risk to public safety during the time that rehabilitation efforts are underway; however, this risk is considered to be very low and will be further minimized during construction by implementing measures such as fencing and monitoring to block public access to the site. In addition, rehabilitation efforts would improve the condition of the Farm's structures, creating a safer environment for park staff, visitors, potential lessees, and the general public.

***3) Any unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, and so forth).***

No wild and scenic rivers or known Indian sacred sites occur within or adjacent to the project areas. No new development will occur in an ecologically critical area or floodplain and any wetlands located within the project area will be avoided and protected from sedimentation during construction. The soil types within the study area (Winooski silt loam and Hadley silt loam) are designated as prime farmland soils; however, the selected alternative will not result in a change to existing agricultural uses or an irretrievable loss of these soil types.

Under the selected alternative, rehabilitation efforts will be completed for historic and cultural resources, including the Mill and Farm's structures and cultural landscape which are listed as contributing features in the 2013 National Register nomination. These improvements would result in beneficial impacts to those resources as the character-defining features of the structures are preserved and the appearance of the Farm's landscape is returned to its period of significance.

While no archeological resources are known to existing within ground-disturbing areas, surveys will be conducted to identify and avoid sensitive resources. Should archeological resources be encountered, the NPS will take appropriate steps to avoid, minimize, or mitigate any adverse effects to the resources.

***4) The degree to which impacts are likely to be highly controversial.***

No highly controversial impacts were identified during either the preparation of the EA or the public review period.

***5) The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.***

No highly uncertain, unique, or unknown risks were identified during preparation of the plan/EA or during the public review period.

***6) Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.***

The selected alternative neither establishes NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration. Future actions will be evaluated through additional, project-specific planning processes that incorporate requirements of NEPA, Section 106 of the National Historic Preservation Act (NHPA), and NPS policies.

***7) Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts.***

Cumulative impacts were analyzed by combining the impacts of the selected alternative with the impacts of three other projects that were identified as contributing to cumulative impacts on the resources addressed by the EA: the realignment of NH Route 12A, the preservation of the Blow-Me-Down Farm Bank Barn and removal of non-historic structures, and the Ascutney Management Unit Long-Range Management Plan. The beneficial and adverse impacts of these other past, present, and reasonably foreseeable future actions on resources, in conjunction with the impacts of the selected alternative, will result in both beneficial and adverse cumulative impacts; however, the overall cumulative impacts are not significant.

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

The selected alternative will not cause the loss or destruction of significant historic properties or other significant scientific, archeological, or cultural resources. Nine structures and two cultural landscapes within the study area are specifically listed as contributing elements of the Saint-Gaudens National Historic Site National Register historic district. Some adverse impacts to the structures and landscapes may be expected during construction, but rehabilitation of these resources will return their appearance to the historic district's period of significance and preserve their character-defining features. Implementation of the selected alternative will also result in beneficial impacts to National Register contributing museum collections as additional space is created for their maintenance, storage, and preservation.

No archeological resources are known to exist within the study area. Ground-disturbing activities will be preceded by archeological investigations to ensure that there are no significant archeological resources that could be impacted by the work. Should archeological resources be encountered, the NPS will take appropriate steps to avoid, minimize, or mitigate any adverse effects to the resources.

***9) The degree to which an action may adversely affect an endangered or threatened species or its habitat.***

One federally-listed endangered species that may occur in the Connecticut River in the area of the Farm is the dwarf wedgemussel (*Alasmidonta heterodon*), which is also listed by the state as

endangered. The selected alternative does not include any fill, dredging, dam construction, or other channel altering activities in either the Connecticut River or the Blow-Me-Down Brook which would adversely affect the dwarf wedgemussel. Additionally, the selected alternative does not include activities along the shoreline or within the waterway of the Connecticut River which would adversely affect potential dwarf wedgemussel habitat.

Several state-listed endangered, threatened, and special concern species which have potential to exist within the study area were analyzed in the EA including the Jefferson Salamander (*Ambystoma jeffersonianum*), Northern Long-eared Bat (*Myotis septentrionalis*), Wood Turtle (*Glyptemys insculpta*), Beaked Sanicle (*Sanicula trifoliata*), Northern Waterleaf (*Hydrophyllum virginianum*), Bladdernut (*Staphylea trifolia*), Large-flowered Bellwort (*Uvularia grandiflora*), Sago Pondweed (*Stuckenia pectinata*), Vasey's Pondweed (*Potamogeton vaseyi*), and slender Cliffbrake (*Cryptogramma stelleri*). While the selected alternative could potentially have adverse impacts to some of these species during construction activities, mitigation measures would be employed to reduce the likelihood of those impacts. No significant adverse impacts are expected to result from implementation of the selected alternative.

***10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.***

The selected alternative violates no federal, state, or local environmental protection laws.

## **PUBLIC INVOLVEMENT AND AGENCY CONSULTATION**

Internal and agency scoping for the plan/EA began with a collaborative, multi-disciplinary brainstorming workshop at Blow-Me-Down Farm in June, 2011. Additional field visits were conducted by NPS lease and resource specialists after the initial internal meeting.

Public scoping began in July, 2011 when the park issued a press release announcing the availability of a public scoping newsletter and a 30-day public review and comment period during which the public was invited to submit comments on the scope of the planning process, issues, concerns and potential alternatives for the plan/EA. During the scoping period, a public scoping open house was held at the Blow-Me-Down Farm to present the history of the park and Farm, detail the EA process, and record public input. The public was then engaged a second time in January 2012 when the park issued a second press release announcing a second newsletter which presented draft alternatives. The NPS also mailed copies of the newsletter on January 17, 2012 to individuals that had attended the public meeting for the plan/EA in 2011.

The plan/EA was made available for public review and comment on June 5, 2013 and was followed by a 31 day comment period that concluded on July 5, 2013. The park distributed a press release announcing the availability of the plan/EA and posted the document on the park planning webpage. The NPS made printed copies of the plan available at the park visitor center. The NPS also sent an e-mail announcement on June 5, 2013 to individuals that had attended the 2011 public meeting.

At the conclusion of the public comment period on July 5, 2013, five public comments had been submitted online via the NPS Planning, Environment and Public Comment (PEPC) website and two comment letters had been mailed to the Superintendent. Of the seven pieces of correspondence received, three supported the implementation of Alternative B – The Cornish Colony History and Art Center. The remaining pieces of correspondence raised substantive issues (questioning the facts of the plan/EA and requiring a response) including the relationship of the proposed federal actions to local zoning regulations; compatibility of leased uses with the park’s legislated purpose; and the dismissal of other alternatives.

The NPS initiated consultation under Section 106 of the NHPA with a letter to the New Hampshire SHPO dated July 19, 2011. The plan/EA was released to the public and SHPO on June 5, 2013 for review and comment on the broad concepts of the plan/EA. The SHPO submitted comments on the plan/EA in a letter dated September 30, 2013 agreeing that the selected alternative’s “use of the property as a Cornish Colony History and Art Center presents the greatest degree of benefit.” The SHPO supported the completion of a cultural landscape report and historic structure reports to guide maintenance and rehabilitation efforts as part of the selected alternative and recommended the NPS complete an archeological assessment, in order to assist with future Section 106 consultation efforts related to implementation of the selected alternative. As the selected alternative is implemented Section 106 consultation will continue including the identification of any appropriate consulting parties. Some of the actions proposed in the plan/EA will fall under the guidance of the NPS nationwide PA for Section 106 while other planning and actions will require the standard Section 106 process. The park will continue to consult with the New Hampshire SHPO as project-specific details of the Farm’s rehabilitation efforts become available, as well as during the park’s biannual meetings with the SHPO and annual Section 106 reporting requirements.

In accordance with Section 7 of the Endangered Species Act, the park initiated consultation with the U.S. Fish and Wildlife Service (USFWS) with a letter dated January 24, 2012. The NPS made a determination of May Affect, but Not Likely to Adversely Affect for the federally-listed dwarf wedgemussel, allowing for any potential inadvertent indirect impacts if streambed siltation occurs due to construction efforts. A web link to the plan/EA with a letter asking for concurrence with the NPS determination was sent to the USFWS on June 6, 2013. The USFWS concurred with this determination on July 5, 2013.

The NPS also consulted with the New Hampshire Natural Heritage Bureau on state-listed species within the study area. A letter requesting comments, along with a weblink for the location of the plan/EA, was mailed to the New Hampshire Natural Heritage Bureau on July 6, 2013 for their review. No comments were received from the NH Natural Heritage Bureau during the review period.


A summary of the substantive comments received with NPS responses and errata are included as Attachment B of this FONSI. The errata make factual corrections to the text of the EA. No changes were made to the selected alternative or impact analysis as a result of agency and public comments.

## FINDING OF NO SIGNIFICANT IMPACT

The NPS has selected Alternative B – The Cornish Colony History and Art Center for implementation. The selected alternative is described on pages 2-1 through 2-3 and 2-5 through 2-12 of the EA. The selected alternative will not have a significant effect on the human environment. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this action and thus will not be prepared.

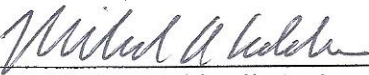
Recommended:

  
James R. Kendall, Superintendent  
Saint-Gaudens National Historic Site

  
Date

1/6/2014

Approved:

  
Michael A. Caldwell, Acting Regional Director  
Northeast Region, National Park Service

  
Date

1/8/2014



# **ATTACHMENT A**

## **NON-IMPAIRMENT DETERMINATION**

### **Blow-Me-Down Farm Site Management Plan**

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

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

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

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

This determination on impairment has been prepared for the selected alternative described in this FONSI. An impairment determination is made for all resource impact topics analyzed for the selected alternative. An impairment determination is not made for visitor use and experience, operations, or gateway communities because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

Implementation of the selected alternative will not result in impairment of park resources or values. The NPS bases this conclusion on a thorough analysis of the environmental impact described in the plan/EA, relevant studies, and professional judgment of the decision-maker

guided by the direction in the NPS *Management Policies 2006*. The analysis did not identify any major adverse impacts that would result from implementation of the selected alternative.

## **Historic Structures**

Under the selected alternative, the Blow-Me-Down Farm and Blow-Me-Down Mill structures would be rehabilitated for use by the park or through lease agreements. All nine structures are listed as contributing resources on the National Register nomination for their association with arts and the Cornish Arts Colony. The selected alternative would allow for rehabilitation of the structures resulting in stabilization and preservation of their character-defining features. Construction efforts will be overseen by the NPS and will follow the Secretary's standards for rehabilitation and consultation, as applicable, would be conducted to avoid impacts to the resources. The selected alternative would not constitute an impairment of historic structures because rehabilitation of the structures would improve their current condition and provide additional opportunities for current and future generation to enjoy those resources.

## **Cultural Landscapes**

The selected alternative will rehabilitate the cultural landscape of the Farm by restoring vegetative features, improving the appearance of the historic structures, and maintaining important views to the surrounding countryside. Under the selected alternative, the Farm's landscape would continue to be inventoried and evaluated and the NPS would implement resource management policies to restore the integrity of the landscape, preserving the natural resource values and culturally significant character-defining patterns and features of the landscape. The selected alternative will not result in impairment of the cultural landscape because the landscape will be improved from its current condition.

## **Museum Collections**

The park's extensive museum collections, many of which are contributing resources to the National Register historic district, are key elements of the park's purpose and significance. The selected alternative will improve curatorial workspace by alleviating overcrowding in the museum collections storage building. The creation of additional non-collections storage space on the Farm and Mill properties would result in beneficial impacts to museum collections by creating a more efficient work space and eliminating the need for frequent relocation of collections items. The selected alternative would not result in impairment of museum collections because increased work and storage space improve the park's ability to preserve and maintain those resources.

## **State-listed Species**

A number of state-listed species have potential to occur within or adjacent to the project area including the Jefferson salamander, northern long-eared bat, wood turtle, beaked sanicle, northern waterleaf, bladdernut, large-flowered bellwort, sago pondweed, Vasey's pondweed, and slender cliff brake. Under the selected alternative, construction activities would result in potential

impacts to wildlife, such as noise disturbance and temporary displacement. The majority of construction activity, however, would occur within areas frequently disturbed by human activities including farming and frequent landscape maintenance (mowing). Mitigation measures to minimize disturbance, monitoring during construction, and revegetation in areas of ground-disturbance would reduce the potential impacts. The selected alternative will not result in impairment of wildlife resources because impacts would be temporary and mitigation measures would be implemented to avoid and reduce impacts.

## ATTACHMENT B

### **Comment with NPS Responses and Errata** **Blow-Me-Down Farm Site Management Plan**

The NPS received a total of seven public comments during the public review period of the Site Management Plan and Environmental Assessment. Several of the comments received raised concerns that do not affect the selected alternative or impact analysis in the plan/EA, but warrant a response. The discussion below provides representative comments that express the issues raised and NPS responses to those comments. The representative comments are quoted exactly as provided by the commenter. Grammar and/or editorial mistakes have not been corrected. Corrections made to the text of the EA are included in an errata list following the summary of comments and responses.

**Representative Comment:** It is very petty and un-neighborly of you to prohibit something as innocuous and harmless as the time-honored picking of the easily renewable resource of fiddlehead ferns on the property.

**NPS Response:** The NPS understands that some members of the community enjoyed harvesting fiddleheads in the past when the Blow-Me-Down Farm was under private ownership. When the Farm was donated to the national park system, however, the property, and everything within its boundary, became protected under federal laws and regulations. The Code of Federal Regulations provide for the proper use, management, government, and protection of persons, property, and natural and cultural resources within areas under the jurisdiction of the National Park Service. The removal of fiddleheads is in violation of these regulations which prohibit “possessing, destroying, injuring, defacing, removing, digging, or disturbing from its natural state...plants or the parts or products thereof” (36 CFR § 2.1). It is the duty of Saint-Gaudens National Historic Site, as a unit of the national park system, to uphold these laws and regulations; therefore, the park will continue to prohibit the harvesting of fiddleheads on park property.

**Representative Comment:** Portions of the property lie in the Regulatory Flood Plain Overlay District and the Connecticut River Shoreline Conservation Overlay District. Presence of the Wetlands Overlay District would be determined by a licensed wetlands scientist. The management plan dismisses the impact topic of floodplains and wetlands (BMDF, pg. 21); however, the authors may not have been aware that each of the overlay districts includes a one hundred foot buffer zone.

**NPS Response:** The NPS is regulated by federal laws and regulations (Executive Order 11988: Floodplain Management, Executive Order 11990: Protection of Wetlands, and Section 404 of the Clean Water Act) which provide the basis for determining potential impacts to floodplains and wetlands. Federal regulations adopted a “no net loss of wetlands” goal for federal agencies and agencies are required to comply with Section 404 of the Clean Water Act for activities that involve the discharge of dredged or fill material into wetlands. Additionally, federal agencies must complete a floodplain Statement of Findings in accordance with Executive Order 11988

when proposed activities would result in occupation or modification of floodplains or result in impacts to floodplain values. In accordance with the National Environmental Policy Act (NEPA), those impact topics were dismissed because no actions proposed are expected to impede or alter floodplains or impact wetlands as defined by federal regulations.

While there is no legal requirement for the Federal Government to comply with local zoning overlay districts, the NPS would consider, and comply with as much as possible, applicable local wetland and floodplain buffers during the design stages of the proposed actions.

**Representative Comment:** 4th paragraph under Regulatory Issues and Management Concerns: Here it says that under Director's Order #38 Real Property Leasing, parks have the ability to, “lease properties for fair market value as long as the lease is compatible with park purposes and valued and the lease would not be destructive to park resources.” This seems to contradict statements elsewhere in the document that indicate that other types of leases are permissible. For example, p. 2-6, paragraph 2: “Phase 2 would permit the park to expand acceptable uses of the Farm beyond those which directly support the park's purpose and significance.”

**NPS Response:** Leasing regulations and NPS management policies require lease uses to be *compatible* with the park's purpose. The purposes of Saint-Gaudens NHS, as stated on page 1-7 of the plan/EA, are to preserve and interpret the home, artwork, properties, life, and times of renowned sculptor Augustus Saint-Gaudens and to commemorate Saint-Gaudens's and the Cornish Art Colony's contribution to the cultural development of the United States. Under Alternative B, the NPS would retain the authority to deny lease proposals that are not compatible or would interfere with or disrupt the park's ability to fulfill its purpose or disrupt the park's ability to find a compatible use for the entire Blow-Me-Down Farm property. While a potential lease could limit the park's ability to expand NPS programming to the Farm, the park would continue to be able to fulfill its legislated purpose in the same manner as prior to the Memorial's donation of the Farm to the NPS. Though a potential use may not directly support the park's mission or enhance its ability to meet this mission, any leased use of the Farm would be compatible and not detrimental to achieving the park's mission.

**Representative Comment:** While proposed uses under leasing agreements would need to be approved by the park and would need to meet National Park Service standards and policies (BMDF pg. 35), the Blow-Me-Down-Farm cannot be removed from its local context. Ownership of the farm by the Park Service should not exempt a potential lessee, public or private, from the same local zoning regulations with which an identical lessee operating through a private landlord would have to comply.

The final paragraph of the plan states that implementation of Alternative B would 'require the NPS to abide by applicable laws and regulations' (BMDF pg. 75). However, the question remains: which of the town of Cornish, NH, regulations would be 'applicable' to a potential lessee of the Blow-Me-Down-Farm property. Clarification of the applicability of local zoning regulations with regard to potential lessees under Phase 1 and Phase 2 of Alternative B would

serve to avoid contention and misunderstandings between the Park Service, the town of Cornish and any future lessees.

**NPS Response:** Saint-Gaudens National Historic Site values its relationships with state and local governments, neighboring landowners, and other concerned parties and recognizes that the park is an integral part of the larger regional environment. The park has and will continue to work cooperatively with local and state governments to resolve potential conflicts, address mutual interests, and protect park resources and values. Although there is no legal requirement for the NPS to adhere to local zoning regulations, the park will consider local zoning laws and requirements (other than procedural requirements) when making decisions regarding potential lease uses.

In addition, federal law gives the NPS the approval authority for construction both as the lessor and as the responsible regulatory agency. NPS rehabilitation efforts must comply, to the maximum extent feasible, with one of the nationally recognized model building codes and with other applicable nationally-recognized codes, including, electrical, fires and safety, and plumbing.

**Representative Comment:** A significant part of this assessment deals with Blow-Me-Down Mill, which is not part of the BMD Farm and did not seem to be included in the BMD Site Management Plan Newsletters in 2011 and 2102. It's addition here comes as something of a surprise given the emphasis and substantial resources to be devoted to it. A number of years ago a proposal was made to develop public use in the Mill and there was substantial public reaction against it for reasons of safety of entry and exit along Route 12A. Has this been considered and addressed?

**NPS Response:** The first two newsletters were published to introduce the public and interested parties to the Blow-Me-Down Farm and present draft alternatives for public and internal review. Comments received during public and internal review of the draft alternatives required the NPS to revise the initial alternatives to include elements such as a better connection to the historic core of the park. Previous planning efforts for the Blow-Me-Down Mill and its surrounding landscape were consulted and relevant actions from those reports were incorporated into this plan/EA. While the previous planning proposals envisioned a larger visitor load and development footprint, this plan/EA identifies mostly upgrades to provide for visitor and vehicular safety, improved lines of sight, connections between the Farm and the historic core of the park, and better environmental harmonization of planned parking. Rehabilitation of the Mill's cultural landscape includes proposals for a modified parking area to address entry and exit safety issues. The NPS would work with the New Hampshire Department of Transportation and the Town of Cornish to ensure public safety is incorporated into the final redesign of the site.

**Representative Comment:** Phase 1 under partnerships and Cooperative Actions: "Saint-Gaudens NHS would oversee rehabilitation efforts to ensure that all work is completed to current NPS standards." Does this refer simply to the quality of the work itself or does it extend to the process?

**NPS Response:** The referenced statement refers to the quality and type of rehabilitation work that may be completed under current NPS standards, primarily the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Secretary's Standards are used to plan for the protection and treatment of historic structures and cultural landscapes to maintain their integrity and protect their character-defining features. Both the design for and the rehabilitation itself would need to meet these standards.

**Representative Comment:** This category "Alternative Elements Considered but Dismissed" is unclear. The Residential Arts School... was dismissed on the basis of the expense to the NPS of rehabilitating the structures prior to programming. There should be another category to make it more clear that such a use is acceptable in terms of content and feasible given a different funding structure.

**NPS Response:** The section on "Alternative Elements Considered but Dismissed" considers elements that were brought up during public and internal scoping as potential ideas for use of the Farm. As stated on page 2-14 of the plan/EA, the Residential Arts School envisioned a role for the NPS that was found to be infeasible, but such a use "could fit within the constraints of Alternative B, Phases 1 and 2, if funding were available from an outside source or an outside entity wished to lease the Farm for the purpose of creating a residential arts school." Thus, the concept as proposed was dismissed because the NPS could not feasibly undertake the role prescribed for it; however, the overall concept could be pursued under the auspices of a lease agreement.

**Representative Comment:** Summary of Alternatives, Alternative B, Phase 2: "Uses [under the park's leasing program] would require park approval, but would not need to relate to park purpose or significance." Whose approval is required? Does the Superintendent make this decision or are other NPS staff involved?

**NPS Response:** Lease agreements go through a process that requires approval from the Superintendent, a committee of resource and lease specialists from the NPS Northeast Regional Office, and the Northeast Regional Director.

**Errata:**

Page 1-3, Figure 1, Park Location Map: remove highlighted area and label named "Cornish State Wildlife Management Area."

Page 4-2, first sentence under the section titled Preservation of the Blow-Me-Down Farm Bank Barn and Removal of Non-historic Structures: revise to read "Under the ownership of the Saint-Gaudens Memorial, stabilization..."