

DEPARTMENT OF THE INTERIOR
National Park Service

Record of Decision; First Ladies National Historic Site General Management Plan and Final Environmental
Impact Statement; First Ladies National Historic Site, Ohio

The Department of the Interior, National Park Service (NPS), has prepared this Record of Decision on the Final General Management Plan / Environmental Impact Statement for First Ladies National Historic Site, Ohio. This Record of Decision includes a description of the background of the project, a statement of the decision made, synopses of other alternatives considered, the basis for the decision, a description of the environmentally preferable alternative, a discussion of impairment of park resources or values, a listing of measures to minimize environmental harm, and an overview of public involvement in the decision-making process.

BACKGROUND OF THE PROJECT

Public Law 106-291, passed in October of 2000, established First Ladies National Historic Site as a unit of the national park system. A comprehensive general management plan was needed to outline resource conditions and visitor experiences desired for this park. The purpose of First Ladies National Historic Site is to preserve and interpret the role and history of First Ladies for the benefit, inspiration, and education of the people of the United States. The purpose of this management plan is to decide what kind of resource conditions and visitor experiences should ultimately be achieved and maintained throughout the park and to provide guidance for managing the park for the next 10 to 15 years. Four alternatives were considered — a no-action alternative, a preferred alternative, an alternative emphasizing partnerships that share resources, collections, exhibits, and programs, and an alternative emphasizing scholarly research.

The concepts presented in the Final General Management Plan / Environmental Impact Statement for the park are based on a thorough consideration of the best available information on park resources and the visitor experience. Alternative B in the final plan presents a distinct vision for preserving the resources that contribute to the park's cultural values while making the resources available to people for their enjoyment, education, and recreation.

DECISION (SELECTED ACTION)

The NPS and its cooperating partner, the National First Ladies Library (NPLL), will implement the preferred alternative as described in the Final General Management Plan / Environmental Impact Statement issued on April 7, 2006. Under Alternative B, the preferred alternative, cultural resources will be preserved, and various types of interpretive programs will be developed to encourage visitors to learn about the importance of the First Ladies and the historic events associated with First Ladies. Interpretive programs will focus on the roles of First Ladies in both their public and private lives. Partnerships will be pursued with a wide variety of agencies and organizations to publicize the site, and to share programming, information, and exhibits.

Most of the Saxton House (House) will be managed as an historic zone. Visitors will be provided access primarily through interpretive tours. The story of the First Ladies will be interpreted at both the House and the Education and Research Center (ERC). Exhibits of artifacts will support the interpretive program. On-site interpretation will be provided at the House through guided tours, with further information available in programs in the ERC theater and during special programs.

Most of the ERC will be managed as a library zone, where resources are maintained at a high level of preservation. Visitor use will be restricted to portions of two floors. Parking will remain at the existing location.

Implementing this alternative will cost approximately \$395,000 in one-time upgrade and construction expenses. Environmental impacts of this alternative are summarized below.

The ERC is listed in the National Register of Historic Places as the National Bank Building. Because the NPS would own the ERC as well as the House under this alternative, the preservation of the integrity and historic character of both structures would be ensured. As NPS-owned properties, both would receive priority assistance from the NPS. This would be a long-term moderate beneficial impact, and would have a positive

cumulative impact. The preservation and ongoing maintenance of the House and the ERC would be consistent with the community's preservation ethic and would augment the City's efforts to preserve and revitalize the area around the site.

This alternative would have a long-term moderate beneficial impact on the House and ERC, as a result of the availability of NPS technical and operational assistance. Ownership of the Rotary Park would allow expanded interpretation of the exterior of the House and would provide a transition between the House and the parking area.

In accordance with the Advisory Council on Historic Preservation's regulations (36 CFR 800) implementing Section 106 of the National Historic Preservation Act, the NPS finds that Alternative B would have no adverse effect on the House, and would have no adverse effect on the ERC. The preservation of the House would be consistent with the Secretary of the Interior's Standards for Rehabilitation, NPS Management Policies 2001, and Director's Order-28 (Cultural Resource Management Guidelines). More detailed treatment plans would be developed in consultation with the Ohio Historic Preservation Office and the NFLL.

OTHER ALTERNATIVES CONSIDERED

Three other alternatives for managing the park were evaluated in the Final Management Plan / Environmental Impact Statement for managing the resources and visitor uses of the park. The **No-action Alternative** represents current management trends at the park. This alternative was presented as a way of comparing current conditions to possible future conditions as described in the other three alternatives.

No new construction or major changes would take place under the no-action alternative. The NPS would continue to own the House, and would preserve the structure to maintain its integrity and character. The NPS would continue to serve as a preservation advocate for the ERC, and would seek to avoid or minimize any adverse effects.

Total annual operations and maintenance are the costs of the no-action alternative. Currently, these costs to the NPS are approximately \$800,000. The cost of Alternative A over 20 years is estimated at \$6.8 – 9.9 million.

Environmental impacts under this alternative would have included long-term minor beneficial impacts to historic structures, because of preservation efforts and adaptive use. There would be potential for minor-to-moderate adverse impacts on museum collections as a result of the lack of museum-quality storage and curatorial workspace, and minor-to-moderate adverse impacts on visitor experience because of facility space limitations.

Alternative A would provide interpretation of the roles and significance of First Ladies through partnerships that share resources, collections, exhibits, and programs. Under this alternative, the NPS and NFLL would acquire objects illustrating or depicting the contributions of all First Ladies, particularly with respect to their public role, for exhibits and interpretation. Most of the Saxton House would be managed as a visitor zone, where guided tours would be conducted, and visitors would be able to walk among the exhibits. Resources would include e-bibliography, museum collections, exhibits, interpretive programs, curriculum-based education programs, and research. Local businesses would provide services such as parking, transportation, promotional materials, and grounds maintenance. The NPS would provide technical expertise and policy guidance, while the NFLL would be responsible for day-to-day on-site administrative activities. The costs to the NPS of implementing Alternative A over 20 years have been estimated at \$7 million – 10 million.

Environmental impacts of Alternative A would include a minor long-term beneficial impact on the NPS-owned House, and a minor long-term beneficial impact on the NFLL-owned ERC. There would be positive cumulative impacts as a result of the availability of NPS technical and operational assistance, for these reasons: The NPS would own the House and insure the preservation of its integrity and historic character. This would be a minor long-term benefit. The House, an NPS-owned property, would receive priority assistance from the NPS. Under this alternative, a higher level of treatment than stabilization would be available to the ERC. The ERC would still be non-NPS owned, but the NPS would provide technical and operational support upon request and dependent on resource availability. Loss of the

integrity of the ERC over time would be less likely to occur because of this increased support, which would be a long-term, minor beneficial impact.

The availability of NPS technical and operational assistance with the preservation of the NFLL-owned ERC would have a positive cumulative impact. Although the NFLL may use other preservation services, this option provides more resources. The City of Canton has a historic landmark ordinance with design review that greatly contributes to the preservation of the downtown area's historic character. The preservation and ongoing maintenance of the NPS-owned House and the non-NPS-owned ERC is consistent with the community's preservation ethic and augments the City's efforts in preservation and revitalization of the downtown area.

Finally, in accordance with the Advisory Council on Historic Preservation's regulations (36 CFR 800) implementing Section 106 of the National Historic Preservation Act, the NPS finds that Alternative A would have no adverse impact on either the House or the ERC. The preservation of the House would be carried out consistent with the Secretary of the Interior's Standards for Rehabilitation, NPS Management Policies 2001, and Director's Order-28 (Cultural Resource Management Guidelines).

Alternative C combines elements of traditional on-site visitation with an emphasis on scholarly research on the roles and impacts of the First Ladies and associated events. To achieve this concept, the NFLL would actively seek accreditation for the ERC as a research facility and also would seek museum accreditation for the House. The library collection would be an internationally known, comprehensive annotated electronic bibliographic library augmented by a collection containing printed material and small personal artifacts associated with each of the First Ladies. A professional reference librarian would be available through the NPS and other partners to provide access to the collections and to provide technical assistance to researchers and students. The NPS and NFLL would share some aspects of site management under this alternative. The NFLL would coordinate programs, schedule tours, supervise docents and volunteers in both the House and the ERC, and would be responsible for their training and development. The NFLL also would manage the House museum. The NPS would provide technical assistance in such areas as policy guidance, planning, cultural resources management, and service contracting. Additionally, the NPS would provide an on-staff research professional. The NFLL and NPS collaboratively would plan and prepare exhibits and educational and interpretive programs offered at the House and ERC. Implementing Alternative C would cost approximately \$9.1- 13.1 million over 20 years.

Environmental impacts of Alternative C overall would include a long-term minor beneficial impact on the Saxton House, because ownership by the NPS would ensure the preservation of its integrity and historic character. The House, an NPS-owned property, would receive priority assistance from the NPS. Under this alternative, a higher level of treatment than stabilization would be available to the ERC. The ERC would still be non-NPS owned, but the NPS would provide technical and operational support upon request and dependent on resource availability. Loss of the integrity of the ERC over time would be less likely to occur because of this increased support, which would be a long-term, minor beneficial impact. The requirements for achieving and retaining accreditation of the House museum and the ERC would have a moderate-to-major beneficial impact on both historic structures. Accreditation requirements would also have long-term major beneficial impacts on the museum and library collections.

The emphasis in this alternative on researchers and "virtual" visitors would limit the options for activities and interpretation at the ERC, resulting in a long-term minor adverse cumulative impact on visitor experience for the casual, drop-in visitors, but would have a long-term major beneficial cumulative impact on visitors conducting scholarly research.

Finally, in accordance with the Advisory Council on Historic Preservation's regulations (36 CFR 800) implementing Section 106 of the National Historic Preservation Act, the NPS finds that Alternative A would have no adverse impact on either the House or the ERC. The preservation of the House would be carried out consistent with the Secretary of the Interior's Standards for Rehabilitation, NPS Management Policies 2001, and Director's Order-28 (Cultural Resource Management Guidelines).

BASIS FOR DECISION

The planning team solicited comments from the public on the scope of this plan in February 2002. Preliminary alternatives were presented to the public in autumn 2005. After careful consideration of public comments received throughout the planning process, including comments on the Draft General Management Plan/Environmental Impact Statement, Alternative B was chosen for implementation.

The Choosing By Advantages (CBA) process was used to select the preferred alternative in the draft plan. The decision factors against which preliminary alternatives were rated were: preservation of the Saxton House, range of visitor experience, extent of involvement of operational partners, range and diversity of partnerships, preservation of original collections, and access to, and use of, collections. The alternative found to have the paramount advantage in this CBA process was Alternative B. While two alternatives, B and C, scored very closely, the team preferred Alternative B because it had superior advantages in protection of cultural resources, particularly the collections.

FINDINGS ON THE ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The environmentally preferable alternative is the alternative that will promote national environmental policy as expressed in section 101 of the National Environmental Policy Act (NEPA). Ordinarily, this means the alternative that will cause the least damage to the biological and physical environment; it also means the alternative that will best protect, preserve, and enhance historic, cultural, and natural resources. Alternative B, which has been selected as the preferred alternative, is also the environmentally preferable alternative. The six criteria listed in the National Environmental Policy Act follow:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural, and natural aspects of our national heritage, and, wherever possible, maintain an environment that supports diversity and variety of individual choices;
5. Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities;
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The environmentally preferable alternative for First Ladies National Historic Site is based on these national environmental policy goals.

All three action alternatives for First Ladies National Historic Site will essentially meet all of the objectives of NEPA. In the process used to select the preferred alternative, Alternative B was found to have the best overall potential for protecting and preserving the historic and cultural resources of First Ladies National Historic Site. Actions under this alternative maximize protection of cultural resources while concurrently attaining the widest range of neutral and beneficial uses of the environment without degradation. More of the collections would be preserved and protected under this alternative than under either of the other alternatives. New construction, if any, would be limited to a small area within the House or ERC. Alternative B maintains an environment that supports diversity and variety of individual choice, and achieves a balance between humans and resources.

FINDINGS ON IMPAIRMENT OF PARK RESOURCES AND VALUES

The NPS may not allow the impairment of park resources and values unless directly and specifically provided for by the legislation or proclamation establishing the park. Impairment that is prohibited by the NPS Organic Act is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. In determining whether impairment would occur, NPS managers examine the duration, severity, and magnitude of the impact, the resources and values affected, and direct, indirect, and cumulative effects of the action. According to NPS policy, "An impact will be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is (a) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; (b) key to the natural or cultural integrity of the park or

to opportunities for enjoyment of the park; or (c) identified as a goal in the park's general management plan or other relevant NPS planning documents" (*Management Policies 2001*).

This policy does not prohibit all impacts on park resources and values. The NPS has the discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impacts do not constitute impairment. Moreover, an impact is less likely to constitute impairment if it is an unavoidable result, which cannot be further mitigated, of an action necessary to preserve or restore the integrity of park resources or values.

After analyzing the environmental impacts described in the Final General Management Plan / Environmental Impact Statement and public comments received on the draft document, the NPS has determined that implementing the preferred alternative will not constitute an impairment of First Ladies National Historic Site resources and values. The actions involved in implementing the preferred alternative will protect and enhance the site's cultural resources and provide for high-quality visitor experiences. None of the impacts of Alternative B will adversely affect resources or values to a degree that will prevent the NPS from fulfilling the purposes of the park, threaten the integrity of the park, or eliminate opportunities for people to enjoy the park

MEASURES TO MINIMIZE ENVIRONMENTAL HARM

Because no impacts were deemed to be likely to cause any environmental harm, there is no mitigation suggested for any identified impacts.

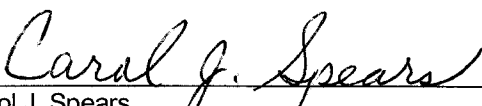
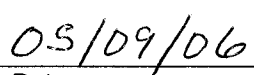
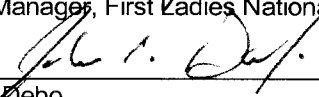
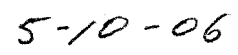
PUBLIC INVOLVEMENT

On February 25, 2002, the planning team held a public meeting at which comments were solicited from the public on the scope of this plan. Preliminary alternatives were presented to the public in autumn 2005, and comments accepted during the 60-day period that the draft General Management Plan was on review. There were four written comments submitted, all favoring the preferred alternative. No substantive comments were received.

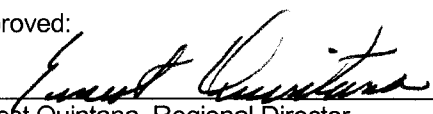
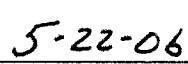
CONCLUSION

Alternative B provides the most comprehensive and effective method among the alternatives considered for meeting the park's purpose, mission, and goals for managing First Ladies National Historic Site and for meeting national environmental policy goals. The selection of Alternative B, as reflected by the analysis contained in the environmental impact statement, will not result in the impairment of park resources or values and will not violate the NPS Organic Act. All practical means to avoid or minimize environmental harm from implementing the selected alternative have been adopted.

Recommended:

 _____ Carol J. Spears Site Manager, First Ladies National Historic Site	 _____ Date
 _____ John Debo Superintendent, Cuyahoga Valley National Park	 _____ Date

Approved:

 _____ Ernest Quintana, Regional Director Midwest Region, National Park Service	 _____ Date
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