



Construct Curatorial Storage Facility for Large Objects

Environmental Assessment / Assessment of Effect



June 2008



**U.S. Department of the Interior
National Park Service**

**Delaware Water Gap National Recreation Area
Bushkill, Pennsylvania**

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Summary

The National Park Service (NPS) proposes to construct a new auxiliary curatorial storage facility at Delaware Water Gap National Recreation Area to house large historic objects including wagons and furniture. These items are currently being stored in various inadequate facilities within the National Recreation Area (park), including facilities in poor condition. These poor conditions have resulted in artifact deterioration, and have made routine inventory, examination, and preservation of the collection difficult to achieve. To minimize the deterioration of objects, and to consolidate the collection, the National Park Service proposes to construct an approximately 2,000 square-foot, one-story auxiliary curatorial storage facility within the park directly behind the current Bushkill Curatorial Storage Facility (Bushkill School) which will provide sufficient storage space for the collection of large objects as well as appropriate climate controls and security systems. The building will also be constructed to seek Leadership in Energy and Environmental Design (LEED) certification through the U.S. Green Building Council.

This document will be used for compliance with both the National Environmental Policy Act (NEPA) of 1969, as amended and the National Historic Preservation Act (NHPA) of 1966, as amended to provide the decision-making framework that 1) analyzes a reasonable range of alternatives to meet project objectives, 2) evaluates potential issues and impacts to the park's resources and values, and 3) identifies mitigation measures to lessen the degree or extent of these impacts. Resource topics that have been addressed in this document because the impacts associated with this project will be greater-than-negligible include museum collections and park operations. All other resource topics have been dismissed because the project will result in negligible impacts to those resources. No significant impacts are anticipated as a result of this project.

Public Comment

This Environmental Assessment/Assessment of Effect will be open for public comment for a period of 30-days from its release. Comments by mail may be addressed to the Superintendent at the address below or comments may be posted electronically at <http://parkplanning.nps.gov>. All comments received, including names and addresses of respondents, may be made publicly available during the NEPA process. Individuals may request that the NPS withhold their name and/or address from public disclosure. If you wish to do this, you must state this prominently at the beginning of your comment. Commentators using the website can make such a request by checking the box "keep my contact information private." The NPS will honor such requests to the extent allowable by law, but NPS may still be required to disclose your name and address pursuant to the Freedom of Information Act.

Superintendent
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PURPOSE AND NEED

INTRODUCTION

Delaware Water Gap National Recreation Area (the park) encompasses 40 miles of the Middle Delaware National Scenic and Recreational River and approximately 68,000 acres of land along the river's New Jersey and Pennsylvania shores. The northern boundary of the park is 3.5 miles south of Port Jervis, New York. The southern boundary is approximately 1.5 miles downriver of the geologically significant water gap (Figure 1). The park includes portions of Pike, Monroe, and Northampton counties in Pennsylvania, and Sussex and Warren counties in New Jersey. Each year, Delaware Water Gap National Recreation Area receives approximately 4.9 million visitors.

The Delaware River is the principal recreational attraction within the park unit. The park contains an extraordinary environment of geologic and natural features as well as cultural landscapes and historic resources. The diverse ecosystems and landscape features provide unique scenery and experiences for visitors and crucial habitat for flora and fauna. The park contains a significant concentration of cultural resources, which research has determined span 12,000 years of human habitation.

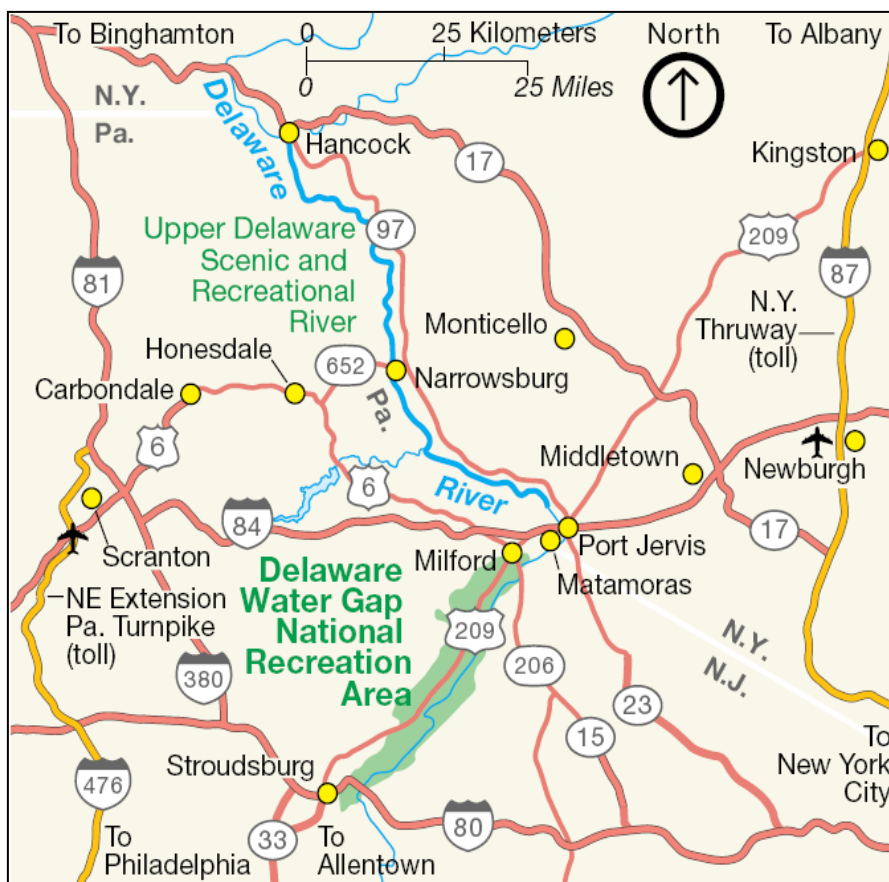


Figure 1. Location of Delaware Water Gap National Recreation Area

This Environmental Assessment (EA) evaluates alternatives for the proposed action and analyzes the potential impacts that these alternatives would have on the human environment. This document has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended; regulations of the Council on Environmental Quality (CEQ) (40 CFR 1508.9); and NPS Director's Order (DO) #12: *Conservation Planning, Environmental Impact Analysis, and Decision-Making*, and associated handbook.

PURPOSE OF THE PROPOSED ACTION

The purpose of the project is to ensure that the historic object collection of the Delaware Water Gap National Recreation Area is cataloged, preserved, and protected according to National Park Service (NPS) standards and guidelines as outlined below:

Code of Federal Regulations, Title 36 Parks, Forests, and Public Property, Chapter 1 National Park Service Director of the Interior, Part 79 Curation of Federally-owned and Administered Archeological Collections (CFR 36, Part 79)

"The regulations in this part establish definitions, standards, procedures and guidelines to be followed by Federal agencies to preserve collections of prehistoric and historic material remains, and associated records, recovered under the authority of the Antiquities Act (16 U.S.C. 431–433), the Reservoir Salvage Act (16 U.S.C. 469–469 c), section 110 of the National Historic Preservation Act (16 U.S.C. 470 h –2) or the Archaeological Resources Protection Act (16 U.S.C. 470 aa-mm). They establish: (1) Procedures and guidelines to manage and preserve collections; (2) Terms and conditions for Federal agencies to include in contracts, memoranda, agreements or other written instruments with repositories for curatorial services; (3) Standards to determine when a repository has the capability to provide long-term curatorial services; and, (4) Guidelines to provide access to, loan and otherwise use collections."

The NPS Management Policies (NPS 2006), Section 5.2.5.5, Museum Collections, states that "The Service will collect, protect, preserve, and provide access to..." collections in accordance with standards and guidelines, as provided in Director's Order #28: Cultural Resource Management and associated handbook, and Director's Order #24 (NPS 2004): Museum Collections Management and associated handbook. Director's Order #24 requires preventative care, preservation, documentation and accountability, cataloguing, inventorying, and provides specific technical guidance on management of collections.

The Delaware Water Gap National Recreation Area General Management Plan (NPS 1987) further directs the park staff: "Museum Collection. The museum collection and archival materials currently in storage will be analyzed to determine which items will be kept... Collection items...will be exhibited or stored in appropriately controlled environments, with adequate protection against accidents, theft, and vandalism; they will be examined periodically to ensure protection."

NEED FOR THE PROPOSED ACTION

The curatorial storage facility is needed because the current facilities in which the large objects are stored are substandard, in poor condition, and dispersed making inventory and upkeep of the collection more difficult for park staff; furthermore, current facilities do not provide adequate access for research. The park collection spans many eras, and has a wide range of materials. Historic objects alone number more than 22,569 (NPS 2007) and include furnishings, textiles, printed material, and domestic and agricultural implements. The historical collections present regional history, especially small-scale agriculture and village life specific to the Upper Delaware River Valley (NPS 1996).

Collection storage at the park has always been divided among multiple buildings in the park, however,

since 1985, Bushkill School Curatorial Storage Facility (Bushkill School), a park administrative structure, formerly a village elementary school, has housed small amounts of the collection and archives. Since that time, the Bushkill School has been improved to include climate control and an alarm system. The park proposes to construct a new auxiliary curatorial storage facility to the Bushkill School at Delaware Water Gap National Recreation Area to house large historic objects including wagons and furniture. Currently, these large items are being stored in various inadequate facilities within the National Recreation Area, including barns and other facilities in fair to poor condition at Millbrook Village and Totts Gap Farm. These facilities provide limited security, insufficient or no lighting, no fire suppression mechanisms, or climate controls and do not accommodate the access requirements per the Americans with Disabilities Act (ADA) Accessibility Guidelines (AG). These poor conditions have resulted in artifact deterioration, and have made routine inventory, examination, and preservation of the collection difficult to achieve.

To minimize the deterioration of objects, and to consolidate, preserve, and protect the collection, the National Park Service proposes to construct an approximately 2,000 square-foot, one-story curatorial storage facility within the National Recreation Area directly behind the current Bushkill School Storage Facility (Figure 2), which houses small archives and office space for the park cultural resource staff. The Bushkill School is located in Lehman Township, Pike County, Pennsylvania, within the National Recreation Area boundaries.

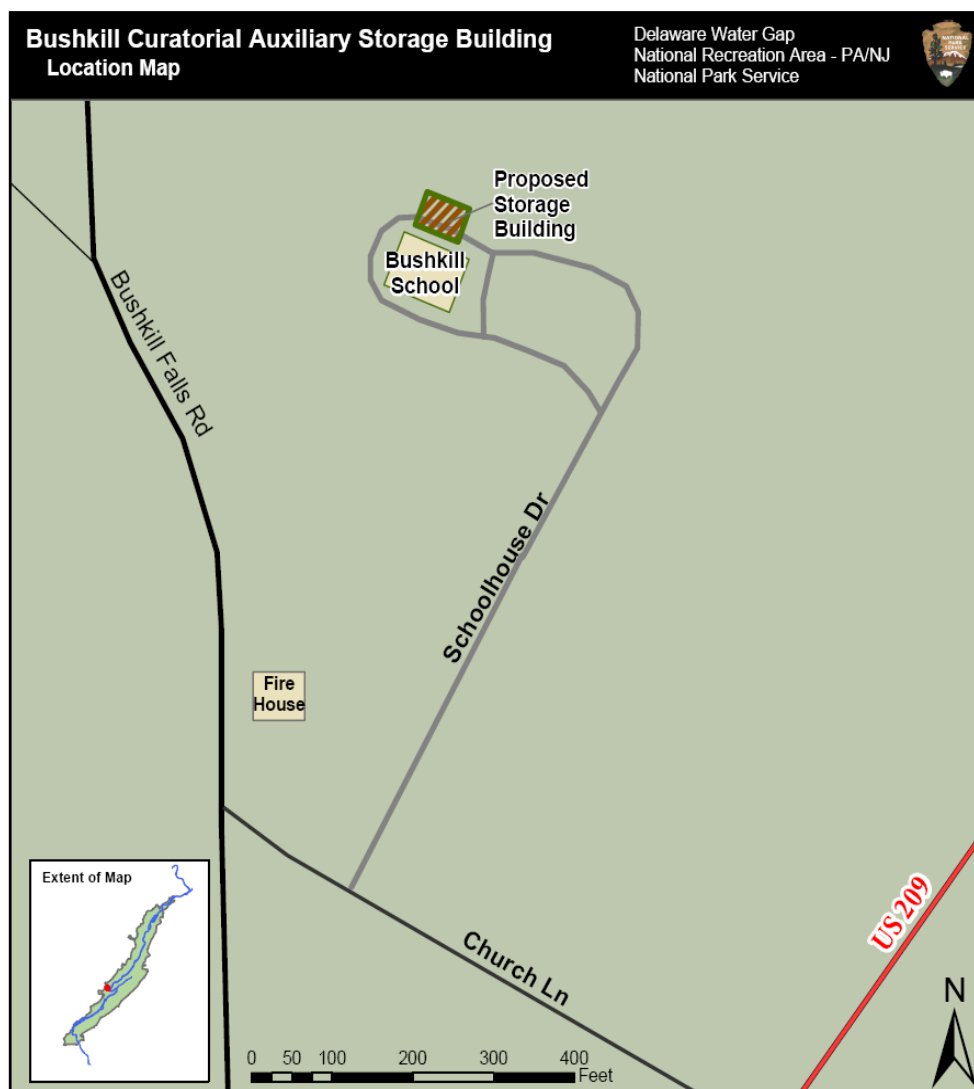


Figure 2. Location Map of Bushkill Curatorial Storage Building

The auxiliary building will provide sufficient storage space for the collection of large objects. The new facility will also be equipped with climate controls to reduce artifact deterioration, fire and intrusion alarms. The building will also be constructed to seek Leadership in Energy and Environmental Design (LEED) certification through the U.S. Green Building Council. Following construction of the museum storage facility, the objects will be relocated to the new building, where National Recreation Area staff will inventory, examine, clean, and restore the collection, as needed.

PROJECT OBJECTIVES

Based on the Purpose and Need for the project and the scoping conducted, the following objectives have been identified for implementation of a curatorial storage facility. The overall goal of the project is to improve the level of the collections care, preservation, and use. Specific objectives to meet this goal include:

1. Provide appropriate, adequate, and consolidated storage of the museum collection;
2. Maintain the collection in one location to facilitate convenient artifact supervision research, preservation, loaning, and curation by park staff;
3. Provide a safer environment for park employees who handle the collection;
4. Provide workspace for research, cleaning, preservation, restoration, or other curatorial duties.

PROJECT PLANNING

The need for an additional curatorial storage facility was identified in the park's *General Management Plan*, June 1987 and the *Collection Management Plan*, October 1996. The General Management Plan specified that the park museum collection would be "...exhibited or stored in appropriately controlled environments, with adequate protection against accidents, theft, and vandalism; they will be examined periodically to ensure protection." The Collection Management Plan further provides recommendations on storage requirements including constructing another structure to consolidate the collection in appropriate conditions and provide access to park curatorial staff and researchers.

The Collection Management Plan was developed by an interdisciplinary team to provide a site-specific, working document intended to provide programmatic guidance. Information was gathered and analyzed beginning in April 1996, with the report being published in October 1996 with suggestions for overall growth and improvement of the park collection. Recommendations from the plan were used to develop alternatives for storage of large objects in the collection, as discussed in this document (Chapter 2: Alternatives.)

Applicable Laws, Policies, and Regulations

The National Park Service Organic Act

In 1916, Congress created the National Park Service in the Department of the Interior with the Organic Act (16 U.S. Code 1, the National Park Service Organic Act). The Organic Act states that NPS will "...conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

The National Environmental Policy Act of 1969, as amended (NEPA)

The National Environmental Policy Act of 1969, as amended, is "...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." It instructs all agencies of the Federal Government to, in part, utilize a systematic and interdisciplinary approach to ensure integration of natural and social sciences into planning and decision-making which may have an effect on the human environment. This document discloses the design, planning, decision-making process, and the environmental consequences of the proposed action as required by NEPA, and as prescribed in NPS Director's Order #12 and associated handbook (2001).

Code of Federal Regulations, Title 36 Parks, Forests, and Public Property, Chapter 1 National Park Service Director of the Interior, Part 79 Curation of Federally-owned and Administered Archeological Collections (CFR 36, Part 79)

"The regulations in this part establish definitions, standards, procedures and guidelines to be followed by Federal agencies to preserve collections of prehistoric and historic material remains, and associated records, recovered under the authority of the Antiquities Act (16 U.S.C. 431–433), the Reservoir Salvage Act (16 U.S.C. 469–469 c), section 110 of the National Historic Preservation Act (16 U.S.C. 470 h –2) or the Archaeological Resources Protection Act (16 U.S.C. 470 aa-mm). They establish: (1) Procedures and guidelines to manage and preserve collections; (2) Terms and conditions for Federal agencies to include in contracts, memoranda, agreements or other written instruments with repositories for curatorial services; (3) Standards to determine when a repository has the capability to provide long-term curatorial services; and, (4) Guidelines to provide access to, loan and otherwise use collections."

§ 79.5 Management and preservation of collections. "The Federal Agency Official is responsible for the long-term management and preservation of preexisting and new collections subject to this part. Such collections shall be placed in a repository with adequate long-term curatorial capabilities, as set forth in §79.9 of this part, appropriate to the nature and content of the collections."

§ 79.9 Standards to determine when a repository possesses the capability to provide adequate long-term curatorial services. The Federal Agency Official shall determine that a repository has the capability to provide adequate long-term curatorial services when the repository is able to: (in part) accession, label, catalog, clean, store, maintain, inventory and conserve the particular collection on a long-term basis using professional museum and archival practices; maintain complete and accurate records of the collection; dedicate the requisite facilities, equipment and space to properly store, study and conserve the collection; keep the collection under physically secure conditions within storage, laboratory, study and any exhibition areas; require qualified staff; inspect the collection; conduct inventories; provide access for scientific, educational and religious uses.

NPS Management Policies (2006)

The National Park Service *Management Policies*, updated in 2006, "sets the framework and provides direction for all management decisions." As a steward of many of the nation's most important cultural resources, every unit of the national park system must carry out management of the unit as guided in the *Management Policies* and "in a manner consistent with legislative and regulatory provisions" and Secretary of the Interior policies and procedures.

The Delaware Water Gap National Recreation Area Enabling Legislation (Public Law 89-158)

The Delaware Water Gap National Recreation Area enabling legislation states “Congress established Delaware Water Gap National Recreation Area in 1965 to provide for “public outdoor recreation use and enjoyment. . . and for the preservation of the scenic, scientific, and historic features contributing to public enjoyment of such lands and waters” (Pub. L. 89-158).

The Delaware Water Gap National Recreation Area General Management Plan

Created and approved in 1987, the Delaware Water Gap National Recreation Area General Management Plan guides the overall management and use of the area’s resources. The plan ensures the perpetuation of the park’s natural and cultural resources and the scenic setting for present and future public enjoyment. The plan also provides the foundation for subsequent detailed implementation plans, programs, and operations. The plan, as directed by the enabling legislation, provides for:

1. Preservation of scenic, scientific, and historic features contributing to public enjoyment;
2. Public outdoor recreation benefits; and,
3. Such utilization of natural resources as in the judgment of the Secretary of the Interior is consistent with, and has minimal impact on, public recreation and protection of scenic, scientific, and historic features contributing to public enjoyment (16 USC 4600-4).

Scoping

Scoping is an effort to involve agencies and the general public in determining issues to be addressed in an EA. Scoping is used to:

- Determine important issues to be given detailed analysis in the EA and eliminate issues not requiring detailed analysis;
- Allocate assignments among the interdisciplinary team members and/or other participating agencies;
- Identify related projects and associated documents;
- Identify permits, surveys, consultations, etc., required by other agencies; and
- Create a schedule that allows adequate time to prepare and distribute the EA for public review and comment before a final decision is made.

Scoping includes any interested agency or any agency with jurisdiction by law or expertise including the State Historic Preservation Officer (SHPO) and associated Indian tribes to obtain early input.

Delaware Water Gap National Recreation Area staff conducted internal scoping for the project. This interdisciplinary process defined the purpose and need, identified potential actions to address the need, determined the likely issues and impact topics, and identified the relationship of the proposed action to other planned projects at the park. The park interdisciplinary team review resulted in a determination that the proposed action will have negligible impacts on the human environment.

IMPACT TOPICS

Impact Topics Analyzed

NPS Operations and Management

Construction of the museum storage facility will consolidate the large object collection of the park into one facility rather than several dispersed locations in the park. Consolidating the collection will be an impact on curatorial staff. Other changes associated with the proposed action include additional maintenance that is required for a new building; and relocation of the collection to the new facility following construction. Because these changes will have a measurable impact on the curator, and the maintenance crew, the topic of park operations has been carried forward for further analysis.

Cultural Resources - Museum Collections

According to Director's Order #24 *Museum Collections*, the National Park Service requires the consideration of impacts on museum collections (historic objects, natural specimens, and archival and manuscript material), and provides further policy guidance, standards, and requirements for preserving, protecting, documenting, and providing access to, and use of, National Park Service museum collections. Currently, the collection at Delaware Water Gap National Recreation Area is dispersed in facilities that have no climate control or security, which is contributing to artifact deterioration and preventing proper curation of the objects. The proposed project is expected to have a measurable, long-term impact on the collection, particularly in terms of artifact preservation. Therefore, the topic of museum collections has been carried forward for further analysis.

Impact Topics Dismissed from Further Analysis

Topography, Soils, and Geologic Resources

The Delaware River flows through the last valley of the Ridge and Valley Province. The associated landscape of the Delaware Water Gap National Recreation Area is characterized by gently rolling to steep river terraces and floodplains. In the vicinity of the Delaware River, the province is characterized primarily by alluvial materials from the river deposited over glacial outwash. The alluvial deposits are generally characterized by stratified clay, silt, sand, and gravel. Underlying glacial outwash is characterized by silt, sands, and gravels that were carried down by ice and glacial meltwaters (NPS 2005a).

The proposed location of the museum storage facility is a mostly flat, previously disturbed compacted area used as a driveway for many years. According to the Natural Resource Conservation Service (NRCS) soil maps for Pike County, PA, the project location is within soil classified as Wyoming, very cobbly sandy loam with 3 to 8% slopes. The soils in the project area are previously disturbed and compacted from use as a driveway for many years, and the topography is relatively flat with no unique geologic features within or near the project footprint; therefore, there will be no to negligible impacts on these resources and the topic was dismissed from further analysis.

Vegetation

The current vegetation within the proposed site is mowed grasses. At the edge of the project area is evergreen forest. No trees will be disturbed for this project. Disturbed grassy areas will be re-vegetated immediately with native species of grasses and permanent re-vegetation will include grasses and other native small trees, shrubs and flowers in rain-gardens that will collect excess runoff from the building roof. Because vegetation will be only temporarily disturbed and will be replaced with native species, there will be no adverse affect to vegetation and was therefore dismissed from further analysis.

Wildlife and Wildlife Habitat

The mature forest, old fields and agricultural lands, riparian areas, wetlands, and talus slopes and ridges in the park provide a wide variety of habitats for wildlife species, including birds, mammals, reptiles, and amphibians. A significant pathway for migratory birds, the Delaware River provides migrating species bottomland habitats for wintering, breeding, feeding, resting, and staging areas. Surveys of wildlife identified approximately 250 birds occurring in the vicinity of the park. Because the proposed project location is a disturbed area only mowed turf-grass and no other vegetation will be disturbed, wildlife and wildlife habitat will not be disturbed more than negligibly by the construction of the facility. Therefore, this topic was dismissed from further analysis.

Special Concern Species

Section 7 of the Endangered Species Act (16 USC 1531 et seq), as amended (ESA), requires an examination of impacts on all federally listed threatened or endangered species. NPS policy also requires examination of the impacts on federal candidate species, as well as state-listed threatened, endangered candidate, rare, declining, and sensitive species (NPS, 2006). An environmental review search of the Pennsylvania Natural Diversity Inventory (conducted 7 April 2008) resulted in a finding of no known resources in the project area, confirming the park's environmental screening results. Therefore, state and federally-listed threatened and endangered species were dismissed from further analysis. As part of the Section 7 consultation process, this document will be submitted to the U.S. Fish & Wildlife Service for review and comment.

Wetlands

Wetlands include areas inundated or saturated by surface or groundwater for a sufficient length of time during the growing season to develop and support characteristic soils and vegetation. The NPS classifies wetlands based on the U.S. Fish and Wildlife Service (USFWS) Classification of Wetlands and Deepwater Habitats of the United States, also known as the Cowardin classification system (Cowardin et al. 1979). According to data from the USFWS National Wetland Inventory and current NPS wetland survey data, there are no wetlands within the vicinity of the proposed project area, and therefore, this impact topic was dismissed from further analysis.

Floodplains

Executive Order 11988, "Floodplain Management" and NPS DO #77-2: *Floodplain Management* requires an examination of impacts to floodplains and potential risk involved in placing facilities within floodplains. The proposed location is shown on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for Pike County (panel 42103C0510C, effective 10/06/2000) and is outside the mapped floodplain. Therefore, the topic was dismissed from further analysis.

Surface Water and Groundwater

The proposed location of the museum storage facility is located on a flat parcel of compacted soils. Current conditions contribute minimally to surface runoff from rainfall events. The proposed facility will be seek to be LEED certified and may limit surface runoff from the structure by integrating rain gardens, which are small-scale bio-retention basins, comprising of a shallow depression (4 to 8 inches deep) that are filled with native plantings. The rain gardens collect rainwater and allow it to be utilized by the plantings or slowly absorb into the ground. Because the building will be constructed on already compacted soils, rainwater from the roof will only negligibly increase potential for runoff to contribute to surface waters. Also, if rain gardens are incorporated to intercept runoff, contributions to surface water will likely be less than from current conditions. Because any impact to surface water and groundwater due to the proposed project would be negligible, this topic was dismissed from further analysis.

Wild and Scenic Rivers

The Middle Delaware National Scenic and Recreational River is 40 miles long and is contained completely within Delaware Water Gap National Recreation Area, which administers the river. The proposed project is within a developed area of the park and will not be within view of the river and any impacts of the project on resources contributing to the outstanding values of the river would be of short duration and negligible and was dismissed from further analysis.

Prime Farmland

Prime and unique farmland are defined by the U.S. Department of Agriculture (USDA) as farmland that is important due to its ability to help meet the short- and long-term food and fiber needs of the nation or because of its suitability for a specific crop. According to the NRCS soil maps for Pike County, PA, the project location is within soil classified as Wyoming, very cobbly sandy loam and is not considered prime farmland. Therefore, this topic was dismissed from further analysis.

Visitation, Visitor Use, and Visitor Experience

The Delaware Water Gap National Recreation Area receives approximately 4.9 million visitors annually. Most visitors come during the summer months of June, July, and August to take part in the numerous outdoor activities. As a National Recreation Area, this NPS unit provides a variety of opportunities including hiking, boating, hunting, fishing, picnicking, swimming, horseback riding, bicycling, and sight-seeing of natural and historical sites of interest within the park. Objects may be displayed as appropriate for interpretation and education, but otherwise would be stored properly to ensure preservation of the materials. The proposed project would not have an effect on visitors or visitor experience as access to the objects housed in curation would not change; only park curatorial staff would readily access the museum storage facility. Therefore, this topic was dismissed from further analysis.

Historic and Cultural Resources (Historic Structures and Cultural Landscapes)

The National Historic Preservation Act of 1966, the National Environmental Policy Act of 1969 (NEPA), the 1916 NPS Organic Act, NPS Management Policies, including Director's Order 28 (Cultural Resources Management), require Federal agencies to consider the impacts of their proposed actions on cultural resources. In June 1994, the Bushkill School was determined by the Keeper of the National Register of Historic Places as not eligible for listing because the school has not been demonstrated to be of historical or architectural importance; and the village which it served no longer retains integrity (see appendices.)

A Section 106 (*36 CFR Part 800*) summary is included in the impact analysis sections for cultural resources under the action alternatives. The Section 106 summary is intended to meet the requirements of Section 106 and is an assessment of the effect of the undertaking on cultural resources, based upon the criteria of effect found in the ACHP regulations.

Indian Trust Resources

Secretarial Order 3175 requires that any anticipated impacts to Indian Trust resources from a proposed project or action by U.S. Department of the Interior agencies be explicitly addressed in environmental documents. Ethnographic resources are objects and places, including sites, structures, landscapes, and natural resources, with traditional cultural meaning and value to associated peoples. Research and consultation with associated people identifies and explains the places and things they find culturally meaningful. Ethnographic resources eligible for the National Register of Historic Places are called traditional cultural properties. There are no known ethnographic resources within the project area that would be affected by the proposed action; therefore, this topic was dismissed from further analysis.

Air Quality

The 1963 Clean Air Act, as amended (42 USC 7401 et seq.) requires land managers to protect air quality. Section 118 of the Clean Air Act further requires parks to meet all federal, state, and local air pollution standards and *NPS Management Policies 2006* (NPS 2006) addresses the need to analyze potential impacts to air quality during park planning. Because the proposed facility would be constructed on a concrete slab foundation on flat, previously disturbed and compacted land, and structure itself will be of pre-fabricated materials, it will require very minimal disturbance and short duration to erect the structure. Any impacts on air quality would be of short duration and negligible from disturbance of soil for the foundation and from operation of equipment during construction, and therefore, was dismissed from further analysis.

Adjacent Land Use and Development

The proposed project is located within the park and will be used solely for park museum storage, therefore, would not result in any measurable impact to adjacent land use or development and was dismissed from further analysis.

Soundscape Management

As described in *NPS Management Policies 2006* (NPS 2006) and NPS DO #47: *Sound Preservation and Noise Management*, preservation of natural soundscapes associated with national park units is an important part of the NPS mission. Natural soundscapes exist in the absence of human-caused sound. At the study area, natural sounds of wildlife are mixed with the flow of vehicular traffic adjacent to the study area on Bushkill Falls Rd. The park does make an effort to minimize the impact of human-cause sounds, where possible. Construction associated with implementation of the proposed action (construction equipment grading and assembling the structure), could result in additional noise but such construction sounds would be temporary. Park operation of the facility will not cause additional impact to the soundscape. Because impacts to the soundscape from the construction of the facility will be minimal and short-term, the impact topic of soundscape management was dismissed from further analysis.

Lightscape Management

In accordance with *NPS Management Policies 2006* (NPS 2006), the NPS strives to preserve natural, ambient lightscapes, which are natural resources and values that exist in the absence of human-caused light. The study area is located in a relatively developed, heavily traveled portion of roadway. As a result, the study area receives regular impacts to existing lightscapes from passing vehicles, as well as surrounding overhead and security lighting. Any additional lighting would be added only within the parking lots (where lights already exist) and for safety and security, and would be shielded or focused downward to minimize light pollution. As a result, these additions would not elevate the existing lightscape impacts within the study area. Therefore, the impact topic of lightscape management was dismissed.

Socioeconomic Resources

NPS Management Policies 2001 (NPS 2000) requires the NPS to identify any impact to socioeconomic resources when determining the feasibility of a proposed action. The proposed action would neither change local and regional land use nor substantially impact local businesses or other agencies. Any increase would be temporary, lasting only as long as construction, and negligible in intensity. Therefore, the impact topic of socioeconomic resources was dismissed.

Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations, requires federal agencies to identify and address any disproportionate adverse human health or environmental impacts of its projects on minority or low-income populations. According to this Executive Order, each federal agency must conduct its programs, policies, and activities that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons or populations from participation in, denying persons or populations the benefits of, or subjecting persons or populations to discrimination under, such programs, policies, and activities because of their race, color, national origin, or income level. The proposed action would have no impact on minority and low income populations therefore this impact topic was dismissed from further analysis.

Health & Safety

NPS Management Policies 2006 require NPS to seek to provide a safe and healthful environment for visitors and employees. The proposed action would provide a safe and healthful environment for park staff responsible for curation of large objects in the park in accordance with policy. There would be no adverse impact on health and safety to park visitors or staff and therefore, the topic was dismissed from further analysis.

Energy Requirements and Conservation Potential

The CEQ guidelines for implementing the NEPA require examination of energy requirements and conservation potential as a possible impact topic in environmental impact statements.

Delaware Water Gap National Recreation Area strives to incorporate the principles of sustainable design and development into all facilities and park operations. Sustainability can be described as the result achieved by operating in ways that do not compromise the environment or its capacity to provide for present and future generations. Sustainable practices minimize the short- term and long- term environmental impacts of developments and other activities through resource conservation, recycling, waste minimization, and the use of energy efficient and ecologically responsible materials and techniques.

The park would reduce energy costs, eliminate waste, and conserve energy resources by using energy efficient and cost effective technology wherever possible. Energy efficiency would also be incorporated into any decision-making process during the design or acquisition of facilities, as well as all decisions affecting park operations. The park would encourage suppliers, permittees, and contractors to follow sustainable practices and address sustainable park and non- park practices in interpretive programs. Consequently, any adverse impacts relating to energy use, availability, or conservation would be negligible.

In addition, the proposed facility will be designed to be certified through the Leadership in Energy and Environmental Design (LEED®) Green Building Rating System of the U.S. Green Building Council. Therefore, energy requirements and conservation potential is an impact topic dismissed from further consideration.

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ALTERNATIVES

This chapter describes alternatives that were developed for storage of the museum collection at Delaware Water Gap National Recreation Area. Only the no action alternative and the proposed project alternative were carried forward for analysis. Several other alternatives were considered but dismissed; these are discussed near the end of the chapter.

ALTERNATIVE A (NO-ACTION)

Alternative A, the No-Action alternative, would continue present management operations. The No-Action alternative does not imply or direct discontinuing day-to-day maintenance and repairs or stopping previously approved plans. The no action alternative provides a basis for comparing present park operations with the action alternatives and their anticipated environmental consequences. If the no action alternative is implemented, the NPS would respond to future needs and conditions without major actions or changes in current management direction.

Current management of the storage and large objects does not provide for compliance with 36 CFR Part 79, Curation of Federally-owned and Administered Archeological Collections. The structures in which the large objects are currently stored were selected based on the amount of space that was readily available. However, the structures have never met the requirements for storage of the objects and would be difficult to rehabilitate and retrofit to meet the requirements. Cyclical maintenance on the structures is performed to extend the useful life and is accomplished as funding allows. When funding is not available, cyclic maintenance backlogs occur and serious repairs take precedence over maintenance. Work is typically accomplished using full-time and seasonal park employees. Several partner groups augment the park work force in maintaining several historic structures, including those at Millbrook Village, which the groups are under agreement to utilize.

If the No-Action alternative were selected, the large museum collection objects would continue to be stored in several barns and structures. The buildings are currently in poor condition and maintenance will likely continue to be deferred. Curation of the objects is difficult because the collection is dispersed and the current structures used for storage do not provide adequate workspace; therefore, proper upkeep of the collection objects will be deferred until suitable storage and workspace is provided. Research can technically be accomplished but not readily. The park would continue to attempt to keep the structures secured against the elements, vandalism, and rodents. Should the No-Action Alternative be selected, the National Park Service would respond to future needs and conditions of the collection storage without major actions or changes in present course of action.

ALTERNATIVE B (PREFERRED ALTERNATIVE)

Alternative B, the Preferred Alternative, would construct a new auxiliary curatorial storage facility at the park to house large historic objects including wagons and furniture. To comply with laws and regulations

guiding storage and management of collections, the park proposes to construct an approximately 2,000 square-foot, one-story auxiliary building. The storage facility will be located within the park directly behind the current Bushkill Curatorial Storage Facility (Bushkill School), which houses small archives and office space for the park cultural resource staff. The auxiliary building will be a pre-fabricated steel structure and would provide a centralized location for the entire museum collection of the park and provide sufficient storage space for the collection of large objects. The new structure would be constructed on a current parking area/driveway and was a shale mining pit prior to the construction of the school. The structure would be constructed on concrete slab foundation and would require a minimal area of grading to provide an appropriate area for the structure. Photo 1 shows the location of the proposed structure (approximately outlined). The building will be constructed to seek Leadership in Energy and Environmental Design (LEED) certification through the U.S. Green Building Council. The new facility will also be equipped with climate controls to reduce artifact deterioration, fire detection/suppression system, and an intrusion alarm.

Following construction of the museum storage facility, the objects will be relocated to the new building, where park staff will inventory, examine, clean, and restore the collection, as needed. The facility would ensure large artifact items are preserved in a climate controlled, secure environment. Alternative B would provide easy access of the collection to park staff responsible for maintaining the objects and provide access for scientific research.



Photo 1. Approximate location of Alternative B, rear of Bushkill School.

MITIGATION MEASURES

The following standard mitigation measures would be implemented during construction of the proposed alternative, as needed:

- Prior to construction, the park will prepare an erosion and sediment control plan. During the construction period, excavated soil will be stockpiled in compliance with the erosion and sediment

control plan. The park will oversee onsite contractors, conduct regular site inspections, and take prompt action against non-compliance, if necessary.

- Construction zones would be identified and fenced appropriately. The fencing would define the construction zone and confine activity to the minimum area required for construction. All protection measures would be clearly stated in the construction specifications and workers would be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing.
- The exterior treatment of the auxiliary curatorial storage facility (color, scale, etc.) will be sympathetic to the existing Bushkill School, so as to blend with the existing developed setting, and be similar to other park structures.
- Landscaping and re-vegetation of disturbed areas and areas immediately adjacent to the storage facility will take place following construction. All disturbed areas would be restored as nearly as possible to pre-construction conditions shortly after construction activities are completed. Weed control methods will be implemented to minimize the introduction of noxious weeds. Existing trees at the site will not be disturbed, to the extent possible.
- To reduce noise and emissions, construction equipment will not be permitted to idle for long periods of time and to minimize possible petrochemical leaks from construction equipment, the contractor will regularly monitor and check construction equipment to identify and repair any leaks.
- A cultural resources specialist will monitor initial ground-disturbing activities. In the event that archeological resources are discovered during construction, all work would cease until the resources are properly recorded by a qualified archeologist. If any resources are determined to be potentially eligible for the National Register of Historic Places, consultation with the appropriate historic preservation offices will be conducted to determine if either avoidance or mitigation is necessary. In the unlikely event that any human remains or funerary and sacred objects are unearthed during construction, the park, in compliance with the Native American Graves Protection and Repatriation Act (1990), would consult the appropriate tribal representatives in order to determine proper treatment.

Alternatives Considered But Dismissed

The following alternatives were considered for project implementation, but were ultimately dismissed from further analysis. Reasons for their dismissal are provided in the following alternative descriptions.

Construct an addition onto Bushkill School - This alternative would construct a 55' x 40' addition to the current museum facility to accommodate the large objects currently dispersed in several buildings. Although the Bushkill School is a structurally sound building, it would be more costly and difficult to construct an appropriate addition to house the objects. The Bushkill School is historic; however, it was determined to be not eligible for the National Register of Historic Structures. Although it is not eligible, constructing an addition would still necessitate complimentary materials and architecture. Because this alternative would be more costly, it was dismissed from further analysis.

Move large objects to other park buildings - This alternative would move the large objects out of the locations where they are currently stored to more structurally stable buildings in the park. This alternative would not centralize the collection for preservation, and would also not provide significantly more security than current facilities provide unless retrofitted. Because this alternative would not fully meet the goals of centralizing and preserving the large objects, this alternative was dismissed from further analysis.

Construct a new building in another park administrative area - This alternative looked at options for constructing a new building for large objects near other administrative buildings. Options included the Bushkill Headquarters Complex, and Dingmans Maintenance Compound. Although these areas would be appropriate for a modern structure for administrative use, the Headquarters Complex is bound by areas of wetland and cannot be expanded. Without changing other uses, the complex could not accommodate a building of the size required. The Dingmans Maintenance Complex is 10 miles north of the current Museum Storage Facility, and although a new storage building there would provide appropriate storage for the objects, it would not meet the goal of the centralizing the collection for inventory and preservation.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The NPS is required to identify the environmentally preferred alternative in its NEPA documents for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM 4.10) and the Council on Environmental Quality's (CEQ) NEPA's Forty Most Asked Questions, defines the environmentally preferred alternative (or alternatives) as the alternative that best promotes the national environmental policy expressed in NEPA (Section 101(b) (516 DM 4.10). In their Forty Most Asked Questions, CEQ further clarifies the identification of the environmentally preferred alternative, stating "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" (Q6a).

Alternative B has been identified as the environmentally Preferred Alternative because it best meets the purpose and need for action and best protects, preserves and enhances cultural resources. Alternative B provides proper storage and preservation of the museum collections for future generations and minimizes risk to collection in inadequate structures in poor condition. Alternative B minimally impacts the physical environment and utilizes building practices and energy efficiency techniques to attain Leadership in Energy and Environmental Design (LEED) certification through the U.S. Green Building Council.

Table 1. Alternatives Comparison Summary

	Alternative A: No Action	Alternative B: Construct Curatorial Storage Facility for Large Objects
Meet Purpose and Need	No. This alternative does not substantially change current management actions. Current storage of large objects of the collection is not in compliance with 36 CFR Part 79 (see page 5 in Purpose and Need). This is due in large part to the lack of funding to maintain structures within the park; limited funding received is focused on eligible structures and those used for visitor services and maintenance on many other structures is deferred.	Yes. This alternative will provide storage in compliance with 36 CFR Part 79 by providing a climate-controlled and secured structure. It will also facilitate compliance by consolidating the resources for curation and inventorying. Requirements of access of the collection for research will be met.

3

Affected Environment and Environmental Consequences

INTRODUCTION AND METHODOLOGY

This chapter analyzes the potential environmental consequences, or impacts, that will occur as a result of implementing the proposed project. NEPA requires consideration of context, intensity, and duration of adverse and beneficial impacts (direct, indirect, and cumulative) and measures to mitigate for impacts. NPS policy also requires that impairment of resources be evaluated in all environmental documents. As required by NEPA, potential impacts are described in terms of type (beneficial or adverse, direct or indirect), context (site-specific, local, or regional), duration (short-term or long-term), and level of intensity (negligible, minor, moderate, or major). These terms are defined below. The impact analyses presented in this document are intended to comply with both NEPA and Section 106 of the NHPA.

Type

Beneficial: A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.

Adverse: A change that moves the resource away from a desired condition or detracts from its appearance or condition.

Direct: An impact that is caused by an action and occurs at the same time and place.

Indirect: An impact that is caused by an action but is later in time or farther removed in distance, but still reasonably foreseeable.

Context

Context describes the area or location in which the impact will occur and includes:

Site-specific: The impact would affect the project site.

Local: The impact would affect the park.

Regional: The impact would affect localities, cities, or towns surrounding the park.

Duration

Duration describes the length of time an effect will occur, either short-term or long-term:

Short-term: Impacts generally last only during construction, and the resources resume their pre-construction conditions following construction.

Long-term: Impacts last beyond the construction period, and the resources may not resume their pre-construction conditions for a longer period of time following construction.

Intensity

Intensity describes the degree, level, or strength of an impact. For this analysis, intensity has been categorized into negligible, minor, moderate, and major. Because definitions of intensity vary by resource topic, intensity definitions are provided separately for each impact topic analyzed in this Environmental Assessment /Assessment of Effect.

Cumulative Impacts

The Council on Environmental Quality (CEQ) regulations, which implement the National Environmental Policy Act of 1969 (42 USC 4321 et seq.), require assessment of cumulative impacts in the decision-making process for federal projects. Cumulative impacts 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 non-federal) or person undertakes such other actions" (40 CFR 1508.7). Cumulative impacts are considered for both the No Action and Preferred Alternatives.

Cumulative impacts were determined by combining the impacts of the Preferred Alternative (Construction of a curatorial storage facility) with other past, present, and reasonably foreseeable future actions. Therefore, it was necessary to identify other ongoing or reasonably foreseeable future projects at the park and, if applicable, the surrounding region. The following projects were identified for the purpose of conducting the cumulative impacts analysis:

Demolish Hazardous Structures (Scheduled for 2011)

The NPS is proposing to remove approximately 132 primary structures, such as residences and barns, and outbuilding, such as garages, sheds and associated utilities from the Delaware Water Gap National Recreation Area. The structures are a priority safety concern for the park because of their seriously deteriorating conditions. The decay and damage has compromised the structural integrity of most of the building structures presenting serious danger. Although the structures are secured and posted indicating no trespass, many are frequently vandalized. The park spends approximately 3,000 man-hours a year patrolling, responding to vandalism, and re-securing these buildings.

Several of the structures are historic and may be eligible for listing on the National Register of Historic Structures. Determinations of Eligibility are currently being reviewed by the State Historic Preservation Officers (SHPOs). Structures which are determined eligible for listing on the National Register will be documented as agreed upon by the park and the SHPOs. Important architectural features may be removed from the structures and become part of the park collection.

The sites would be restored to a natural condition, which would include final grading and seeding with native vegetation. Most of the sites are easily accessible or may require some vegetative clearing or other improvement to the existing access roads. Other sites will be difficult to access and may require the structures to be felled in place.

State Route 2001 Reconstruction Project (PennDOT)

The State Route (SR) 2001 (Milford Rd) project is an on-going project underway by the Pennsylvania Department of Transportation (PennDOT). It began on the north section of the road from Milford south to State Route 739 in Dingmans Ferry and was completed several years ago. The project is continuing from SR 739, south to and including Bushkill Falls Road to US 209 in Bushkill totaling approximately 14 miles of roadway. Currently, travel lanes are narrow with limited shoulders (total width on average of 18ft). Roadway will be improved to provide travel lanes with shoulders to current safety standards. This will increase the total width of the road to approximately 38 ft (22 ft total for travel lanes and 8 ft shoulders on each lane). The project will require land exchanges between the park and PennDOT for

approximately 35 acres within the park boundary and wetland mitigation for the road corridor. PennDOT is currently finalizing designs and acquiring permits for the project. Stormwater and wetland impacts are being mitigated to the extent possible, however due to the topography of the land along the roadway, increases in stormwater are unavoidable.

Employee Housing (Government Furnished Housing) Program

Many historic structures in the park have been maintained through the employee housing program, in which employees rent housing from the government at set market rates. Recent increases in rental rates throughout the program have resulted in many of the employee housing structures being vacated. If these structures cannot be leased or utilized by park partners, they will require maintenance by park staff. Because these maintenance needs will increase on these structures, either more employees will be needed to maintain the vacant structures, or structures will fall into “deferred maintenance” and be at increased risk of vandalism and destruction. The park intends to actively pursue individuals and organizations to occupy and maintain these important structures.

Impairment

NPS Management Policies 2006 requires analysis of potential impacts to determine whether or not actions would impair park resources. The fundamental purpose of the national park system, established by the Organic Act (16 USC 1-4) and reaffirmed by the General Authorities Act of 1970, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values. However, the laws do give the NPS the management discretion to allow impacts to park 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 the management discretion to allow certain impacts within parks, that discretion is limited by the statutory requirement that the NPS must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values. An impact to any park resource or value may constitute an impairment, but an impact would be more likely to constitute an impairment to the extent that it has a major or severe adverse effect upon a resource or value whose conservation is:

1. necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
2. key to the natural or cultural integrity of the park; or
3. identified as a goal in the park's GMP or other relevant NPS planning documents.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. In this "Environmental Consequences" section, a determination on impairment is made in the Conclusion section of the impact analysis for each impact topic related to natural and cultural resources. Impairment determinations are not made for socioeconomic topics, or visitor use and experience (unless impacts are resource based) because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values and according to the Organic Act, cannot be impaired in the same way that an action can impair park resources and values. Impairment may result from NPS activities in managing the park, as well as visitor activities or activities undertaken by concessionaires, contractors, and others operating in the park. An impairment determination for all impact topics is provided at the end of this chapter in the “Conclusion” section, with the exception of Visitor Use and Experience, Operations, and Utilities, for which no impairment determination is made.

CULTURAL RESOURCES MUSEUM COLLECTIONS

Intensity Level Definitions

Fire, theft, and vandalism can threaten a park's museum collections of prehistoric and historic objects, botanical and zoological specimens, and archival and photographic materials. The preservation of museum collections including archives is an ongoing process of conservation with a primary goal of preserving the collections in as stable an environment as possible. The methodology for this impact analysis is based on how the character defining features of the collection are affected by storage of the collection in terms of security; fire detection and suppression; temperature and humidity control; and present and future space needs for curation, storage, and research.

- Negligible:** Impact(s) is at the lowest levels of detection - barely perceptible and not measurable.
- Minor:** The impact would be measurable and perceptible, but would not affect the character defining feature(s) of the collection.
- Moderate:** The impact would alter the character defining feature(s) of the collection, which may slightly diminish the integrity of the resource and/or its relationship with the park's purpose and significance.
- Major:** The impact would alter the character defining feature(s) of the collection, which would substantially diminish the integrity of the resource and/or its relationship with the park's purpose and significance.
- Impairment:** A major, adverse impact to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning documents.

Impacts of Alternative A (No Action)

The No Action Alternative would result in moderate adverse impacts to the large museum collection objects of the park. The large objects would continue to be stored in several locations with substandard protection. Structures in poor condition would continue to degrade further threatening the integrity of the collection. Proper maintenance, curation, and storage of specimens would continue to be deferred. Without environmental climate controls, the potential for artifact deterioration would persist, which could eventually lead to the loss of pieces of the collection. Without a security system and fire protection system, the collections would continue to be susceptible to fire and theft. Because of the condition of the current facilities housing large objects and the locations of the facilities being opposite the park from the office of the park curatorial staff, regular maintenance, use, and research of the collection would likely continue to be difficult. Dust, insects, and rodents would also promote further artifact damage.

Cumulative Impacts: The collection at Delaware Water Gap National Recreation Area has been stored in various unfit locations at the park over the years, which has led to artifact deterioration and an incomplete inventory of objects in the collection. Lack of adequate curatorial space with appropriate environmental climate controls has contributed to the deterioration of museum objects at the park, which has and will result in a moderate, long-term, adverse impact to large artifact museum collection pieces.

The Hazardous Structure Demolition project may impact park collections by increasing the number of objects to be archived. As structures are demolished, some may contain important architectural features, such as mantels, doors, hardware, etc., which may be salvaged, if appropriate, and archived in the collection. Determination of significance and need for archiving would be in consultation with State Historic Preservation Officers (SHPO). This has the potential to slightly increase curatorial duties.

The State Route 2001 (Milford Road) project would not impact park collections.

Changes in the NPS Employee Housing Program could affect the park collection in much the same way as the Hazardous Structure Demolition project if structures become vacant for long periods of time. Any items located in park housing that could become part of the park collection would need to be moved to the storage facility. This has the potential to slightly increase curatorial duties.

The No Action alternative in combination with other projects and actions in the park would continue to have an overall moderate long-term adverse impact on large objects of the park collection.

Conclusion: The No Action Alternative would result in moderate, long-term, adverse impacts to museum collections from the continued deterioration of objects located in inadequate and insufficient storage. Cumulatively, the No Action Alternative in addition to other past, present, or reasonably foreseeable future actions would continue to have a moderate, long-term, adverse impact to museum collections. Because the project will not result in major, adverse impacts to the museum collections at the park, there would be no impairment of the park's resources or values.

Section 106 Summary: After applying the Advisory Council on Historic Preservation's criteria of adverse effects (*36 CFR Part 800.5 Assessment of Adverse Effects*), the NPS concludes that implementation of alternative A would have no adverse effect on historic objects (non-accessioned and accessioned objects).

Impacts of Alternative B (Preferred Action)

The Preferred Alternative would construct a new auxiliary curatorial storage facility at the park to house large historic objects including wagons and furniture. A new building will allow for the consolidation of the collection into one facility (aside from those objects on display or on loan at various times). The additional, consolidated space achieved through a new building will improve access to the collection, thereby promoting more regular curatorial duties to be conducted including inventory, research, cleaning, and preservation of the collection.

The curatorial storage facility will be equipped with environmental climate controls, a security system, and a fire detection system, which will result in a beneficial effect to the collection. The environmental climate controls will provide the appropriate temperature and humidity levels required for proper preservation of the collection, thereby prolonging the life of the collection. A security system will reduce the risk of theft, while the fire detection system will lessen the chance of damage to the collection from fire. A new museum storage facility will further protect the collections because damage to the collections from dust, insects, and rodents will be greatly minimized.

The Preferred Alternative will entail relocating the collections from their present locations into the museum storage facility. Relocation of the collection from the historic buildings to the curatorial storage facility would entail numerous trips in and out of the buildings by park staff and physically moving the objects out of the buildings and into the new building. These activities could increase the potential for damaging the objects in the collection, which could potentially result in minor adverse impacts to these objects. However, mitigation measures, including the monitoring of transport activities by park staff, are

designed to minimize potential damage to the collection. Following relocation of the large objects to the new building, park staff will inventory, examine, clean, and restore the collection, as needed.

Cumulative Impacts: As described in the cumulative impacts of the no action alternative, the collection at the park has been stored in various unfit locations at the park over the years, which has led to artifact deterioration and an incomplete inventory of objects in the collection. Lack of adequate curatorial space with appropriate environmental climate controls has contributed to the deterioration of museum objects at the park, which has and will result in a moderate, long-term, adverse impact to large artifact museum collection pieces.

The Hazardous Structure Demolition project may impact park collections by increasing the number of objects to be archived. As structures are demolished, some may contain important architectural features, which may be salvaged, as determination of significance and need for archiving would be in consultation with State Historic Preservation Officers (SHPO). This has the potential to slightly increase curatorial duties.

The State Route 2001 (Milford Road) project would not impact park collections.

Changes in the NPS Employee Housing Program could affect the park collection in much the same way as the Hazardous Structure Demolition project if structures become vacant for long periods of time. Any items located in park housing that could become part of the park collection would need to be moved to the storage facility. This has the potential to slightly increase curatorial duties.

Conclusion: The Preferred Alternative will result in a beneficial, long-term effect to the large artifact collection because the curatorial storage facility will provide adequate storage space with proper environmental controls, a security system, and fire detection system, thereby resulting in long-term benefits to the preservation of the collection. Minor, adverse impacts may occur to certain items in the collection if they are damaged during relocation to the curatorial storage facility. Cumulatively, the Preferred Alternative in addition to other past, present, and reasonably foreseeable future actions will have a short-term negligible impacts, and beneficial, long-term impact. Because the project will not result in major, adverse impacts to the museum collections at the park, there would be no impairment of the park's resources or values.

Section 106 Summary: After applying the Advisory Council on Historic Preservation's criteria of adverse effects (*36 CFR Part 800.5 Assessment of Adverse Effects*), the NPS concludes that implementation of alternative B would have no effect on historic objects (non-accessioned and accessioned objects).

NPS OPERATIONS AND MANAGEMENT

Intensity Level Definitions

Implementation of a project can change the operations of a park. A project may affect the number of employees needed at the park; the type of duties that need to be conducted; when/who will conduct these duties; how activities should be conducted; and administrative procedures. The methodology used to assess potential changes to park operations is defined as follows:

Negligible: Park operations would not be affected or the impact would be at or below the lower levels of detection, and would not have an appreciable impact on park operations.

- Minor:** The impacts would be detectable, but would be of a magnitude that would not have an appreciable adverse or beneficial effect on park operations. If mitigation were needed to offset adverse impacts, it would be relatively simple and successful.
- Moderate:** The impacts would be readily apparent and would result in a substantial adverse or beneficial change in park operations in a manner noticeable to staff and the public. Mitigation measures would probably be necessary to offset adverse impacts and would likely be successful.
- Major:** The impacts would be readily apparent and would result in a substantial adverse or beneficial change in park operations in a manner noticeable to staff and the public, and be markedly different from existing operations. Mitigation measures to offset adverse impacts would be needed, could be expensive, and their success could not be guaranteed.

Impacts of Alternative A (No Action)

The No Action Alternative will not change current management and operations at the park. The park curatorial staff will continue to be responsible for curatorial duties, and their offices will not change location. Management of the large artifact collection will continue to be compromised due to the poor storage and unconsolidated large objects and will not be in compliance with laws and regulations pertaining to the management of these resources. Research, inventory, and other activities that require dedicated work space will be difficult due to the condition existing storage buildings. Maintenance crews and volunteers at the park will continue to perform general maintenance on the existing buildings used for storage of the collection as funding allows, however, conditions will either stay the same or become worse. Although there will be no change in management of park operations (curatorial, maintenance, or otherwise), the No Action Alternative will continue to have a minor impact on park operations for curatorial staff because the large artifact collection is unconsolidated in structures in more remote areas of the park ultimately resulting in non-compliance with applicable regulations in inventory, maintenance of the objects, and accessibility for research.

Cumulative Impacts: The Hazardous Structure Demolition project may impact park operations by increasing the number of objects to be archived. As structures are demolished, important architectural features, such as mantels, doors, hardware, etc., may be salvaged, if appropriate, and archived in the collection. This would create increased curatorial duties thereby requiring more hours of limited staff time to curatorial duties, which could cause a delay in other projects.

The State Route 2001 project will be impacting portions of park land. In most locations, archeological testing has been completed and the likelihood of encountering artifacts is considered low; however, the potential does exist. If such a discovery occurred, the park would coordinate with PennDOT and its consultants and the PA SHPO in mitigation of the resources. This could have a minor, short-term impact on park operations, specifically, cultural resources / archeology staff due to the potential for increased coordination and review necessary. Also, during construction of the roadway, traffic may be detoured through the park on US 209. This would increase traffic in the park, likely requiring more law enforcement rangers to patrol the roadway. This would be expected to have a minor effect on park operations overall.

Changes in the NPS Employee Housing Program could affect and be affected by park operations. If more structures in park become vacant, more maintenance of these structures is necessary by park personnel. The longer a structure is vacant, the more maintenance necessary to keep it secured, and intact. Currently, many vacant structures in the park are vandalized, requiring the time of both law enforcement and maintenance division to repair and re-secure the structure. In some instances, important features of

the structures are damaged or stolen. Any items located in park housing that could become part of the park collection would need to be moved to the storage facility. This would create increased curatorial duties. The NPS Employee Housing program changes, if not mitigated by utilizing park partners to occupy the structures and assist in maintenance, could result in minor adverse impacts to park operations.

Overall, the majority of past, present, and reasonably foreseeable future projects will have minor impacts on park operation. During implementation of these projects, park employees may be temporarily affected to a minor adverse degree because of additional duties such as monitoring the construction or advising contractors, or additional maintenance needs, but these additional duties will be eliminated following construction. Cumulatively, the minor impacts of the No Action Alternative in addition to the temporary, minor, adverse impacts to employees during implementation of other past, present, and reasonably foreseeable future projects will result in minor adverse impacts to park operations on a short-term basis as a result of additional duties.

Conclusion: The No Action Alternative will have a minor impact because there would be no long-term change to existing park operations; however, current deficiencies would persist or worsen. Cumulatively, the No Action Alternative combined with other past, present, and reasonably foreseeable future projects will result in minor adverse impacts to park operations, due to the additional, temporary duties that park employees may have during implementation of these projects.

Impacts of Alternative B (Preferred Alternative)

Construction of a curatorial storage facility under the Preferred Alternative will improve access to the collections, which will result in a long-term beneficial effect. The curatorial staff will have improved access to the collection because it will be consolidated into one building, which will reduce the time/effort needed on for park staff to locate and work with the large objects. Adequate and appropriate storage (organization of the collection, proper shelving, etc.) will allow the park staff to more easily and efficiently conduct routine maintenance of the large objects, particularly general housekeeping duties and will provide sufficient space needed to conduct research, inventory, or cleaning of the historic objects.

The new auxiliary curatorial storage facility for large objects will provide a safer, cleaner environment than the existing structures used for storage, thereby benefiting park operations to a moderate degree. The building will be constructed to seek Leadership in Energy and Environmental Design (LEED) certification through the U.S. Green Building Council. The building will be constructed to reduce energy costs and be a sustainable design to reduce maintenance needs required for the park to perform, however there will be some maintenance and repairs expected over the long-term. The increased workload of due to maintenance of the structure and operational costs will result in a long-term, minor, adverse effect to park operations.

Following construction of the auxiliary storage facility, relocation of the large objects from current locations in various buildings in the park to the new facility will require additional time commitments on the part of the curatorial staff and will require additional seasonal staffing. This will result in a temporary, minor, adverse impact to park operations because the curatorial staff will be dedicated to assisting with the organization and monitoring of the collection relocation/transport to the new storage facility. It is anticipated it will take approximately 4 months to relocate the objects. Once the objects have been relocated to the new facility, the curatorial staff will be responsible for organizing and placing the objects in their appropriate places. Any cleaning, inventory, or repair of objects that takes place during the relocation process will also be the responsibility of the park curatorial staff.

Cumulative Impacts: The Hazardous Structure Demolition project may impact park operations by increasing the number of objects to be archived. As structures are demolished, important architectural features, may be salvaged, if appropriate, and archived in the collection. This would create increased

curatorial duties thereby requiring more hours of limited staff time to curatorial duties, which could cause a delay in other projects.

The State Route 2001 project will be impacting portions of park land. In most locations, archeological testing has been completed and the likelihood of encountering artifacts is considered low; however, the potential does exist. If such a discovery occurred, the park would coordinate with PennDOT and its consultants and the PA SHPO in mitigation of the resources. This could have a minor, short-term impact on park operations, specifically, cultural resources / archeology staff due to the potential for increased coordination and review necessary. Also, during construction of the roadway, traffic may be detoured through the park on US 209. This would increase traffic in the park, likely requiring more law enforcement rangers to patrol the roadway. This would be expected to have a minor effect on park operations overall.

Changes in the NPS Employee Housing Program could affect and be affected by park operations. If more structures in park become vacant, more maintenance of these structures is necessary by park personnel. The longer a structure is vacant, the more maintenance necessary to keep it secured, and intact. Currently, many vacant structures in the park are vandalized, requiring the time of both law enforcement and maintenance division to repair and re-secure the structure. In some instances, important features of the structures are damaged or stolen. Any items located in park housing that could become part of the park collection would need to be moved to the storage facility. This would create increased curatorial duties. The NPS Employee Housing program changes, if not mitigated by utilizing park partners to occupy the structures and assist in maintenance, could result in minor adverse impacts to park operations.

Overall, the majority of past, present, and reasonably foreseeable future projects listed in the cumulative scenario will have minor impacts on long-term park operations and minor short-term adverse impacts because of additional duties such as monitoring the construction or advising contractors, but these additional duties will be eliminated following construction. The Preferred Alternative is expected to have a temporary, minor, adverse effect on park operations because it will require nearly full-time time commitments of the curator / museum technician to the relocation of the objects from the historic buildings and the organization of the collection in the new storage facility. In addition to the minor, adverse impacts from other past, present, and reasonably foreseeable future projects, cumulatively, there will be a short-term minor to moderate impact on park operations, and long-term negligible to minor impact on management and park operations.

Conclusion: The Preferred Alternative will result in a long-term, beneficial effect to park operations because the curatorial staff will have improved access to the large artifact collection, thereby allowing them to perform their curatorial duties more easily and effectively. Short-term, minor, adverse impacts to park operations will occur from the staffing time needed to relocate, inventory, and clean the objects and organizing the new facility. The museum storage facility will require additional maintenance and will incur additional costs for energy, which will have long-term, minor, adverse impacts on park operations. Cumulatively, the Preferred Alternative in addition to other past, present, and reasonably foreseeable future projects will result in short-term, minor to moderate, adverse impacts to park operations during construction of these projects, and long-term negligible to minor adverse impacts to management and operations.

Table 2. Summary Comparison of Impacts

Resource	Alternative A: No Action	Alternative B: Construct Curatorial Storage Facility for Large Objects
Cultural Resources – Museum Collections	No changes to current management direction. <u>Overall Impact:</u> Moderate <u>Cumulative Impact:</u> Moderate	Construct new structure to house large objects. Provide workspace to perform curatorial duties including inventory and maintenance. Provide accessibility for research. <u>Overall Impact:</u> Long-term, beneficial <u>Cumulative Impact:</u> Negligible
NPS Operations and Management	No change to current management direction. <u>Overall Impact:</u> Minor <u>Cumulative Impact:</u> Minor	Collection consolidated resulting in improved curation. Process of consolidating collection will consume curatorial staff time. Additional building requiring some level of maintenance. <u>Overall Impact:</u> Minor <u>Cumulative Impact:</u> Minor to Moderate

4

Coordination and Consultation

NPS DO #12 requires the NPS to make “diligent” efforts to involve the interested and affected public in the NEPA process. This process, known as scoping, helps to determine the important issues and eliminate those that are not; allocate assignments among the interdisciplinary team members and/or other participating agencies; identify related projects and associated documents; identify other permits, surveys, consultations, etc. required by other agencies; and create a schedule that allows adequate time to prepare and distribute the environmental document for public review and comment before a final decision is made.

An environmental review search of the Pennsylvania Department of Conservation and Natural Resources, Pennsylvania Natural Diversity Inventory (PNDI), conducted 7 April 2008, resulted in a finding of no known resources in the project area, confirming the park’s environmental screening results. A copy of the PNDI receipt is included in Appendix A of this document. As part of the Section 7 consultation process, this document will be submitted to the U.S. Fish & Wildlife Service for review and comment.

The NPS notified the State Historic Preservation Office (SHPO) in April 2008 at the yearly consultation meeting of the project and the intent to issue a combined Environmental Assessment and Assessment of Effect. Correspondence regarding the Bushkill School determination of eligibility for listing on the National Register is included in Appendix B. This EA will be submitted to the PA State Historic Preservation Officer as part of the consultation process.

This EA will be distributed for public and agency review with a comment period of at least 30 days.

List of NPS Preparers

Kara Deutsch, NEPA Specialist

Lori Rohrer, Archeological Technician

John R. Wright, Chief of Visitor Services & Cultural Resources / NHPA Specialist

Contributors and Reviewers

John Donahue, Superintendent

Bob Karotko, Deputy Superintendent

Allan Ambler, Biologist

Larry Hilaire, Wildlife Biologist

Bill Leonard, Chief of Maintenance

Patrick Lynch, Chief of Research & Resource Planning

Jacki Katzmire, Northeast Region Environmental Coordinator

Jeffrey Shreiner, Biologist

References Cited

Cowardin et al.

- 1979 Classification of Wetlands and Deepwater Habitats of the United States. Prepared for the U.S. Department of the Interior, Fish and Wildlife Service, Office of Biological Services, Washington, DC 20240.

Council on Environmental Quality (CEQ)

- 1978 Executive Office of the President. 1978. Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act. Code of Federal Regulations Title 40, Parts 1500-1508. Washington D.C.
- 1981 Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations

National Park Service, Department of the Interior (NPS)

- 1987 *General Management Plan Delaware Water Gap National Recreation Area / Pennsylvania-New Jersey.*
- 1996 *Delaware Water Gap National Recreation Area Collection Management Plan.*
- 1998 *Director's Order #28: Cultural Resource Management Guideline.*
- 2000a *2000 to 2005 Strategic Plan for Delaware Water Gap National Recreation Area.*
- 2001 *Directors Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making.*
- 2006 *National Park Service Management Policies 2006.*
- 2007 *Collections Management Report, Fiscal Year 2007*

Pennsylvania Natural Heritage Program (PNHP)

- 2008 Natural Community Types. Accessed at: www.naturalheritage.state.pa.us/community.aspx

Pennsylvania State University and National Resource Conservation Service (PSU and NRCS)

- 2008 Pennsylvania Soilmap. Available at: <http://soilmap.psu.edu/>.

United States Access Board

- 2002 ADA Accessibility Guidelines for Buildings and Facilities (ADAAG)

Appendices

- A. Pennsylvania Natural Diversity Inventory (PNDI)
- B. National Park Service and Pennsylvania Bureau for Historic Preservation
Correspondence regarding the eligibility of the Bushkill School.

Appendix A: Pennsylvania Natural Diversity Inventory (PNDI) Receipt

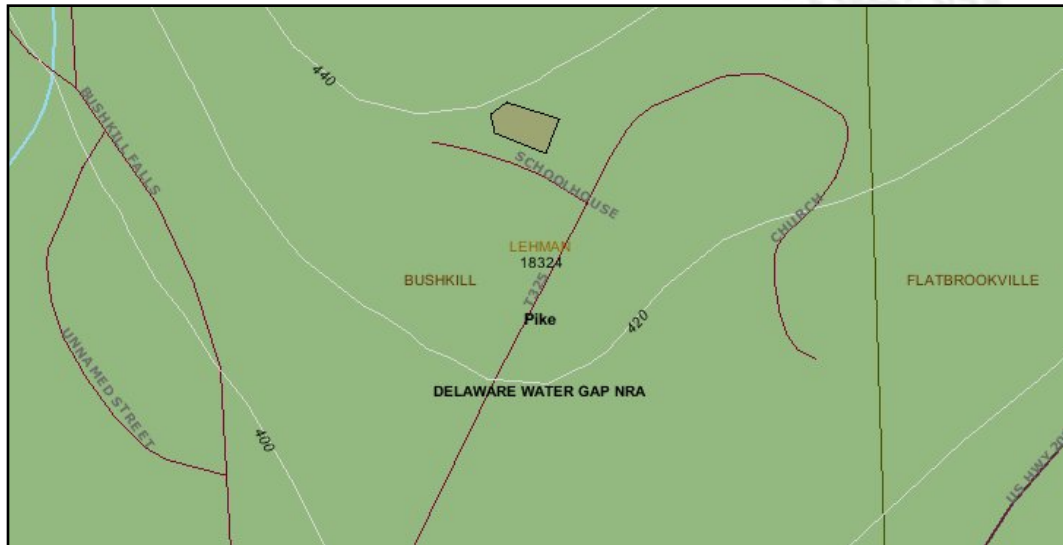
PNDI Project Environmental Review Receipt

Project Search ID: 20080407135413

Project Name: Bushkill Museum Storage

Date: 4/7/2008 9:03:33 AM

Project Location



Location Accuracy

Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Receipt is solely responsible for the project location and thus the correctness of the Project Review Receipt content.

0 Known Impacts

Under the Following Agencies' Jurisdiction:
None

Project Name: Bushkill Museum Storage

On Behalf Of: Federal Agency

Project Search ID: 20080407135413

Date: 4/7/2008 9:03:25 AM

of Potential Impacts: 0

Jurisdictional Agency:

Project Category: Development, Additions/maintenance to existing development facilities

Project Location

Decimal Degrees: 41.09742 N, -75.00172 W

Degrees Minutes Seconds: 41° 5' 50.7" N, 75° 0' 6.2" W

Lambert: 826236.07221813, 778300.61925817 ft

ZIP Code: 18324

County: Pike

Township/Municipality: LEHMAN

USGS 7.5 Minute Quadrangle ID: 525

Quadrangle Name: BUSHKILL

Project Area: 0.1 acres

PNDI Project Environmental Review Receipt

Project Search ID: 20080407135413

Project Name: Bushkill Museum Storage

Date: 4/7/2008 9:03:33 AM

Pennsylvania Natural Diversity Inventory (PNDI) records do **NOT** indicate any known impacts on special concern species and resources within the project area. DEP requires a signed copy of this receipt with permit applications being submitted as indication that an environmental review has been conducted and completed. See DEP PNDI policy at www.naturalheritage.state.pa.us for more information.

Based on the information you provided, no further coordination is required by the Pennsylvania Game Commission, the Pennsylvania Fish and Boat Commission, or the Pennsylvania Department of Conservation and Natural Resources with regard to special concern species, natural communities, or outstanding geologic features. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

Based on the project-specific information you provided, no impacts to federally listed, proposed, or candidate species are anticipated. Therefore, no further consultation under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.* is required with the U.S. Fish and Wildlife Service. Because no take of federally listed species is anticipated, none is authorized. For a list of species that could occur in your project area (but have not been documented in PNDI), please see the county lists of threatened, endangered, and candidate species. A field visit or survey may reveal previously undocumented populations of one or more threatened or endangered species with a project area. If it is determined that any federally listed species occur in your project area, the U.S. Fish and Wildlife Service requires that you initiate consultation to identify and resolve any conflicts. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

These determinations were based on the project-specific information you

provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the information you provided does not accurately reflect this project, or if project plans change, DEP and the jurisdictional agencies require that another PNDI review be conducted.

This response represents the most up-to-date summary of the PNDI data files and is good for one(1) year from the date of this PNDI Project Environmental Review Receipt.

DISCLAIMER

The PNDI environmental review website is a preliminary environmental screening tool. It is not a substitute for information obtained from a field survey of the project area conducted by a biologist. Such surveys may reveal previously undocumented populations of species of special concern. In addition, the PNDI only contains information about species occurrences that have actually been reported to the Pennsylvania Natural Heritage Program.

TERMS OF USE

Upon signing into the PNDI environmental review website, and as a condition of using it, you agreed to certain terms of use. These are as follows:

The web site is intended solely for the purpose of screening projects for potential impacts on resources of special concern in accordance with the instructions provided on the web site. Use of the web site for any other purpose or in any other way is prohibited and subject to criminal prosecution under federal and state law, including but not limited to the following: Computer Fraud and Abuse Act of 1986, as amended, 18 U.S.C. Â§ 1030; Pennsylvania Crimes Code, Â§ 4911 (tampering with public records or information), Â§ 7611 (unlawful use of computer and other computer crimes), Â§ 7612 (disruption of service), Â§ 7613 (computer theft), Â§ 7614 (unlawful duplication), and Â§ 7615 (computer trespass).

PNDI Project Environmental Review Receipt

Project Search ID: 20080407135413

Project Name: Bushkill Museum Storage

Date: 4/7/2008 9:03:33 AM

The PNHP reserves the right at any time and without notice to modify or suspend the web site and to terminate or restrict access to it.

The terms of use may be revised from time to time. By continuing to use the web site after changes to the terms have been posted, the user has agreed to accept such changes.

This review is based on the project information that was entered. The jurisdictional agencies and DEP require that the review be redone if the project area, location, or the type of project changes. If additional information on species of special concern becomes available, this review may be reconsidered by the jurisdictional agency.

PRIVACY and SECURITY

This web site operates on a Commonwealth of Pennsylvania computer system. It maintains a record of each environmental review search result as well as contact information for the project applicant. These records are maintained for internal tracking purposes. Information collected in this application will be made available only to the jurisdictional agencies and to the Department of Environmental Protection, except if required for law enforcement purposes—see paragraph below.

This system is monitored to ensure proper operation, to verify the functioning of applicable security features, and for other like purposes. Anyone using this system consents to such monitoring and is advised that if such monitoring reveals evidence of possible criminal activity, system personnel may provide the evidence to law enforcement officials. See Terms of Use.

Print this Project Review Receipt using your Internet browser's print function and keep it as a record of your search.

Signature: _____

Date: _____

Project applicant on whose behalf this search was conducted:

APPLICANT

Contact Name: National Park Service, K. Deutsch

Address: 1 River Road

City, State, Zip: Bushkill, PA 18324

Phone: 570-426-2460

Email: _____

PERSON CONDUCTING SEARCH (if not applicant)

Contact Name: _____

Address: _____

City, State, Zip: _____

Phone: _____

Email: _____

The following contact information is for the agencies involved in this Pennsylvania Natural Diversity Inventory environmental review process. Please read this entire receipt carefully as it contains instructions for how to contact these agencies for further review of this particular project.

PNDI Project Environmental Review Receipt

Project Search ID: 20080407135413

Project Name: Bushkill Museum Storage

Date: 4/7/2008 9:03:33 AM



Appendix B: National Park Service and Pennsylvania Bureau for Historic Preservation Correspondence regarding the eligibility of the Bushkill School.



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Post Office Box 1026
Harrisburg, Pennsylvania 17108-1026

January 7, 1994

Mr. Clifford Tobias, Regional Historian
United States Department of the Interior
National Park Service, Mid-Atlantic Region
143 South Third Street
Philadelphia, PA 19106

Re: H32 (MAR-PRP)

Dear Clifford:

Enclosed are the signed Determination of Significance cover sheets for the Bushkill School and the Bushkill Firehouse, both located in Lehman Township, Pike County, PA. The Bureau for Historic Preservation concurs with the National Park Service's assessment that the Firehouse is not eligible but it is our opinion that the School retains integrity and meets National Register Criteria.

If you need further information, please contact Greg Ramsey of my staff.

Sincerely,


Dan Deibler

Chief, Division of Preservation Services

GR/gr
Enclosures



Treasurer
District

DETERMINATION OF SIGNIFICANCE

PARK NAME, STATE Delaware Water Gap National Recreation Area, PA

STRUCTURE NAME(S): Bushkill School

PROPERTY / DISTRICT NAME: _____

LOCATION *Street Address:* Township Road 305 *Town / City:* Village of Bushkill
Municipality: Lehman Township *County:* Pike *PARK Tract #:* 7531

DATE BUILT: 1925 **LCS #:** N.A. **PARK #:** _____

SIGNIFICANCE National ☐ State & Regional ☐ Local ☐

NATIONAL REGISTER CRITERIA A ☐ B ☐ C ☐ D ☐

NARRATIVE STATEMENT OF SIGNIFICANCE

See attached Historic Architectural Assessment

Continuation Sheet? ☒

NARRATIVE DESCRIPTION

See attached Historic Architectural Assessment

Continuation Sheet? ☐

National Park Service, MARO

State Historic Preservation Office

Comments

Individually Eligible ☐

Contributes to:

Property ☐

District ☐

Potential District ☐

Not Eligible & Does Not

Contribute to Property/District ☒

Insufficiently Documented,

Treat as Eligible ☐

Concur ☐

Do Not

Concur ☒

Locally significant under
NR Criteria A and C.

See Specific Evaluation
sheet attached.

Signature

[Signature]
Regional Director, MARO

[Signature]
State Historic Preservation Officer

A STATEMENT OF CONTEXT HAS ACCOMPANIED THIS RECOMMENDATION.

Specific Evaluation

Name: Bushkill School

Location: Lehman Twp., Pike Co.

National Register Criteria

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- x A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- x C. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory or history.

Area(s) of Significance: Education, Architecture

Period of Significance: 1925-1944

Comments: In the opinion of the Bureau for Historic Preservation, the property appears to meet the criteria for listing on the National Register. Constructed in 1925, the Bushkill School apparently contributed to the local educational system and is also a fine example of typical early 20th century school design. It has survived in excellent condition with little changes to its interior plan. Interior and exterior decorative features are still intact.



United States Department of the Interior

NATIONAL PARK SERVICE

MID-ATLANTIC REGION

U.S. CUSTOMS HOUSE, ROOM 251

PHILADELPHIA, PA 19106



IN REPLY REFER TO:

H32 (MAR-PRP)

APR 18 1994

Memorandum

To: Associate Director, Cultural Resources, WASO 400
Attn: Carol Shull, Chief, National Register Branch,
Interagency Resources Division, 413

From: Associate Regional Director, Planning and Resource
Preservation, Mid-Atlantic Region

Subject: Request for Determination of Eligibility, Bushkill
School, Delaware Water Gap NRA

In accordance with 36 CFR Part 63.2, we hereby forward for your review and decision a disputed Determination of Eligibility (DOE) for the former Bushkill School, Tract 7531, Township Road 305, Village of Bushkill, Lehman Township, Pike County, Pennsylvania, Delaware Water Gap NRA. On October 21, 1993, we requested the concurrence of the State Historic Preservation Officer (SHPO) in the park consultant's finding that the property does not meet National Register Criteria as an individual property, and that while it would qualify as a contributing element to a historic district, the historic character of the village has been lost.

On January 7 the Pennsylvania Bureau for Historic Preservation (BHP) replied that it found the Bushkill School to be locally significant under Criteria A and C. We remain skeptical that this is really a significant building. The park is convinced that it is not, and has requested that we appeal the Deputy SHPO's finding to the Keeper of the Register. Although the building is used for park administrative purposes and is not scheduled for removal, its certification as a Register-eligible property would have major operational implications.

Attached are copies of the following correspondence:

1. Historic Architectural Assessment, March 1993
2. Letter of transmittal to SHPO, October 21, 1993
3. BHP reply and finding of Register eligibility, January 7, 1994
4. Park's request for appeal to the Keeper, April 8, 1994.

RECEIVED
DEWA

APR 20 1994

We request your decision at your earliest convenience. If you need additional information, please contact DEWA Chief of VS & CR Randy Turner at (717) 588-2451, or Regional Historian Clifford Tobias at (215) 597-9970.

KATHERINE H STEVENSON
Katherine H. Stevenson

Attachments

cc:
Supt, DEWA



United States Department of the Interior

TAKE
PRIDE IN
AMERICA

NATIONAL PARK SERVICE

P.O. Box 37127

Washington, D.C. 20013-7127

IN REPLY REFER TO:

413

To: Katherine H. Stevenson
Mid-Atlantic Regional Office
National Park Service
US Customs House Rm. 251
143 South Third Street
Philadelphia, PA 19106



July 6, 1994
Pike County
Bushkill School D.O.E

The Director of the National Park Service is pleased to inform you of our determination pursuant to the National Historic Preservation Act, as amended, and Executive Order 11593 in response to your request for a determination of eligibility for inclusion in the National Register of Historic Places. Our determination appears on the enclosed material.

As you know, your request for our professional judgment constitutes a part of the Federal planning process. We urge that this information be integrated into the National Environmental Policy Act analysis and the analysis required under section 4(f) of the Department of Transportation Act, if this is a transportation project, to bring about the best possible program decisions.

This determination does not serve in any manner as a veto to uses of property, with or without Federal participation or assistance. The responsibility for program planning concerning properties eligible for the National Register lies with the agency or block grant recipient after the Advisory Council on Historic Preservation has had an opportunity to comment.

We are pleased to be of assistance in the consideration of historic resources in the planning process.

Attachment

E.O. 11593

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places
National Park Service



Name of Property: Bushkill School

Location: Pike County

State: PENNSYLVANIA

Request submitted by: NPS/Katherine H. Stevenson

Date received: 4/18/94

Additional information received:

Opinion of the State Historic Preservation Officer:

☒ Eligible ☐ Not Eligible ☐ No Response ☐ Need More Information

Comments:

The Secretary of the Interior has determined that this property is:

☐ Eligible Applicable criteria: ☒ Not Eligible

Comments:

The Bushkill School, constructed in 1925, does not meet the National Register criteria for individual eligibility. The school has not been demonstrated to be of historical or architectural importance; the interior of the building has been altered (loss of one classroom, both bathrooms, and the closing off of the large rear space into two separate spaces); and the village which it once served no longer retains integrity, so there is no potential for a historic district.

☐ Documentation insufficient

(Please see accompanying sheet explaining additional materials required)

Patrick Andrews
Keeper of the National Register

Date: 6/24/94



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

July 25, 2007

Edward G. Roach
SBA Network Services, Inc.
5900 Broken Sound Parkway NW
Boca Raton, FL 33487-2797

TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: ER 07-0815-103-G
FCC: Resubmission of SBA Proposed 240-Foot Lattice Cell Tower, Van Shy Rd., Lehman Twp., Pike Co.

Dear Mr. Roach:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

Thank you for the revised submission for the above referenced project and notifying us of the inaccuracy of the National Register status of two properties in the area of potential effect. The Bureau has verified that the Cultural Resources GIS incorrectly identified the National Register status of the Bushkill Firehouse and Bushkill School as undetermined. They will reflect the determinations, found in the paper files, that both are not eligible for the National Register.

Based on the information in the submission, the proposed 240-foot cell tower will not be visible from the National Register listed Costello House that is located within the Area of Potential Effect (APE). The tower will be minimally visible from the National Register listed Peters House and the Turn Store and Tinsmith's Shop, which are located outside of the APE. In our opinion, due to distance, topography, and intervening natural landscape, the proposed cellular tower will have no effect on these historic properties.

In our opinion no archaeological resources will be affected by this project. Therefore, your responsibility for consultation for this project is complete.

If you need further information in this matter please consult Ann Safley at (717) 787-9121.

Sincerely,

Douglas McLearen, Chief
Division of Archaeology & Protection

cc: John Wright, Delaware Water Gap national Recreation Area, Bushkill, PA 18324

DMcL/ras

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

D-282

EXPERIENCE YOUR AMERICA

