

## Memo to Files

To: Files  
From: Superintendent, Nancy Nelson  
Through: Park Interdisciplinary Team  
Subject: Adequacy of National Environmental Policy Act Documentation

### Project Description

Minute Man National Historical Park (MIMA) proposes (PEPC #17379) the demolition of the Albano House, Garage/Apartment and Produce Stand, an early twentieth-century (pre-1920) farm complex. The house and produce stand exhibit severe structural deterioration and in their current state pose health and safety risks to MIMA employees and visitors. Additional, mold and hazardous waste issues in the house make occupation or rehabilitation unfeasible.

### Description of Previous Compliance Documentation

Demolition of buildings in the park was analyzed during preparation of the 1989 General Management Plan (GMP). Scoping for the Draft GMP/Environmental Assessment (GMP/EA) began in the early 1980s with the development of several long-range planning documents. These were followed by workshops beginning in 1985 and public meetings in 1987 and 1988. Over 2,250 copies of the Draft GMP/EA were distributed for public review in May 1988, with open houses were conducted to receive comments. The GMP/EA analyzed 5 alternatives and selected one in the FONSI, dated July 6, 1989. The selected alternative was then used to write the Final GMP, which was published in September 1989 and released to the public in January 1990. The Final GMP stated that "selective restoration of the 18th-century environment will provide a flavor of the physical conditions on April 19, 1775, without requiring the detailed replication of the entire landscape" (p. 34) within the Battle Road Unit of MIMA. To this aim, it proposed that historic structures dating to the seventeenth through nineteenth centuries be restored on the outside and that many of them be rehabilitated for adaptive reuse. Tables 1 and 2 (pages 17, 40–41) listed historic buildings within the park and outlined proposed treatments for them. All post-1920 buildings were to be demolished.

In July 1990 an errata to the GMP, dated May 1990 was signed by the Regional Director. The errata responded to comments received on the final plan. Among other things, the errata identified two historic buildings, the Rego House (1920) and the Kinsler House (c.1900) that needed to be added to the list of historic buildings on tables 1 and 2.

In February and March 1991, a draft amendment to the GMP was distributed to town officials and interested people, which proposed changes to which parcels of land were recommended for acquisition by MIMA and to the lease for Willow Pond Kitchen. The amendment also affirmed the relationship between NPS and former owners residing in the park, and promised to coordinate with local governments in formulating legislation and implementation plans. The regional director signed a FONSI, dated April 17, 1991, regarding this amendment and the final amendment to the GMP was signed on May 13, 1991.

## Impact Analysis

The following provides in depth impact analysis for specific impact topics. Please see the attached Environmental Screening Form for additional impact analysis.

| Impact Topic                            | Summary of Impact Analysis and Mitigations   |
|---|--|
| Air Quality                             | Demolition of the Albano complex would result in negligible, localized, short-term adverse impacts as a result of dust and emissions from combustion engines and debris, and noise.  |
| Floodplains/<br>Wetlands                | The Albano complex is not located within a floodplain or wetland, or within 100' of a wetland. Demolition will have no potential impact to wetlands or floodplains.  |
| Hazardous<br>Materials                  | Hazmat associated with the structures consists of asbestos and possible lead as typically used in domestic structures. A hazmat survey will be conducted prior to demolition and any hazmat will be contained and disposed of by a licensed contractor in accordance with applicable state and federal regulations. Additionally, mold growth throughout the house makes it unfit for human occupation (see attached report by Blank).   |
| Scenic Values                           | The selected alternative from the Draft GMP/EA emphasized the selective restoration of the 18 <sup>th</sup> -century cultural landscape. The removal of the Albano structures will contribute to the attainment of that goal. Impacts to the landscape will be minor, long-term and positive.  |
| Threatened and<br>Endangered<br>Species | The NPS determines that the demolition of the Albano Complex will have "no effect" on federally recognized threatened or endangered species. Tony Tur, U.S. Fish & Wildlife Service New England Field Office concurred with this determination over the phone to Margo Davis on 8/29/08. Additionally, the Albano Complex does not fall into a priority habitat and is not subject to review under the MA Endangered Species Act. No impact to threatened or endangered species is anticipated.  |
| Historic<br>Buildings                   | <p>The Albano house, garage/apartment, and produce stand are listed in the LCS and were listed on the National Register of Historic Places in 2006 as contributing elements to Minute Man National Historical Park for their local significance to architecture and the agricultural landscape. Since the survey that determined these structures eligible for listing, their condition has deteriorated to the point where the physical integrity of the buildings is compromised (see Diwittikar and Blank condition assessments).</p> <p>The 1990 GMP specified that historic buildings dating to pre-1920 would be saved, restored and reused. It also provided a list of buildings considered "historic" with specific treatments identified for each building. The Albano Complex was not noted on this list, nor was it added to the list when the 1990 Errata identified additional pre-1920 buildings to be restored and reused. The GMP did not intend for this complex to specifically be saved and since 1990, it has been managed as a non-historic resource by the park.</p> <p>Currently, the Albano structures are past the point of safe reuse and toxic mold makes such rehabilitation and reuse prohibitively expensive and possibly dangerous for occupants.</p> <p>The demolition of these structures would result in an adverse effect to the Minute Man National Historical Park National Register District. However,</p> |



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|                        | <p>whereas these buildings were not specifically identified as historic buildings that contribute to the park goal of selective restoration of the 18th century cultural landscape, and whereas treatments were not identified for these buildings in the GMP, and whereas the buildings lack the structural integrity needed to reuse them, and whereas in their current condition they pose a health and safety risk to MIMA employees and visitors, and whereas their demolition is consistent with the GMP's vision of selectively restoring the battlefield landscape, therefore, the demolition of these buildings would result in a minor environmental impact to MIMA.</p> <p>A Memorandum of Agreement (MOA) created in consultation with the Massachusetts SHPO will outline mitigation for the adverse effect on the district. This MOA will undergo public review prior to its adoption.</p> |
| Archaeological Sites   | The project has been designed to avoid any potentially significant archaeological sites that may exist within the yard area of the Albano complex of buildings by fencing sensitive yard areas and restricting equipment to paved or gravel areas. There should be no adverse effect to archaeological resources.  |
| Ethnographic Resources | The produce stand was designated an ethnographic resource because of its association with the farm family that lived in the house, raised produce and sold it at the stand. The association with the family was lost more than twenty years ago when the family no longer sold produce at the stand. Without the association with the farm family, the produce stand is no longer an ethnographic resource.  |

### Appropriate Use

Sections 1.5 and 8.12 of NPS *Management Policies 2006* underscore the fact that not all uses are allowable or appropriate in units of the National Park System. The proposed action was screened to determine consistency with applicable laws, executive orders, regulations, and policies; consistency with existing plans for public use and resource management; actual and potential effects to park resources; total costs to the Park Service; and whether the public interest would be served. Therefore, the Park Service finds that the proposed project is an appropriate use. Because the application of mitigating measures is expected to be successful in ensuring that no major adverse impacts would occur and that any adverse impacts to the National Register District are adequately mitigated, implementation of the proposed project would not result in any unacceptable impacts.

- The action is consistent with the park's purpose to interpret the events of April 17, 1775 in that it is removing a 20<sup>th</sup>-century intrusion on the landscape. This is part of an ongoing cumulative effort to remove 20<sup>th</sup>-century surplus buildings from the park landscape.
- The action does not impede the park's desired conditions for natural or cultural resources as stated in the GMP and described above. It helps fulfill the park goals as stated in the GMP to selectively reproduce the feeling of the 1775 landscape.
- The action remedies an unsafe condition for park employees and visitors.
- The action does not diminish opportunities for current or future visitors to be inspired by park resources or values.
- The action does not unreasonably interfere with park programs, appropriate use, atmosphere, or concessionaires since the buildings are not in usable condition. They currently detract from the commemorative atmosphere of the park.



## Impairment

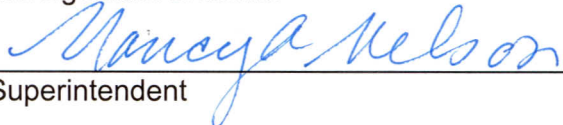
The National Park Service Organic Act of 1916, and related laws, mandate that the units of the national park system must be managed in a way that leaves them "unimpaired for the enjoyment of future generations". These laws give the NPS the management discretion to allow certain impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values. Director's Order 12 states that environmental documents will evaluate and describe impacts that may constitute an impairment of park resources or values. In addition, the decision document will summarize impacts and whether or not such impacts may constitute an impairment of park resources or values. An impact would be more likely to constitute impairment to the extent that it affects 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 to opportunities for enjoyment of the park, or
3. identified as a specific goal in the park's general management plan or other relevant NPS planning documents.

The National Park Service has determined that implementation of the project will not constitute an impairment to MIMA resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the Draft GMP/EA, the Environmental Screening Form prepared for this project, relevant scientific studies, cultural resource management expert opinions, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies (2006). Although the project has some negative impacts to secondary resources, in all cases these adverse impacts are the result of actions taken to preserve and restore primary park resources and values. Overall, the project results in benefits to park resources and values, opportunities for their enjoyment, and does not result in their impairment.

## Conclusion

The interdisciplinary team (IDT), consisting of Terrie Wallace, (Park Section 106 Coordinator), Margo Muhl Davis (Compliance Advisor, Northeast Region), and the CRM Advisor Team consisting of Jim Harmon (Archeologist), Chuck Smythe (Ethnographer), Richard Crisson (Historical Architect), and John Hammond (Historical Landscape Architect) conducted internal scoping to review the proposed project. After careful review of the September 1989 Environmental Assessment and the 1990 errata, as well as the March 1991 Amendment to the GMP, the team concurs that the previous document provides adequate support for the demolition of the Albano Complex and that it was never the intent of the GMP to restore this complex or treat it as an historic building. Neither the original EA, nor this evaluation, recognize any potential for more than minor adverse impacts (in light of its many reported beneficial effects) and there upon there is no expected impairment to NPS resources or disparity to the management of same.

  
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Superintendent

  
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Date