



November 10, 2023

FINDING OF NO SIGNIFICANT IMPACT
Pullman Joint General Management Plan
ENVIRONMENTAL ASSESSMENT
Pullman National Historical Park, Illinois

BACKGROUND

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) has prepared an environmental assessment (EA) to examine the environmental impacts of the actions identified in the Pullman Joint General Management Plan (JGMP) for Pullman National Historical Park (PULL). The JGMP is needed to provide site-specific guidance for the management of resources and visitors and the development of infrastructure in the park. The plan provides management guidance and actions that will be carried out as staff and funding become available. The plan holistically presents future potential actions for the management of PULL, including actions proposed by Illinois Department of Natural Resources (IDNR) and other partners. The EA, consistent with NEPA and NPS policy, is focused on those actions the NPS is proposing while considering the cumulative impacts of other past and proposed future actions taken near PULL.

During preparation of the EA, the NPS consulted with federal and state agencies, Indigenous Nations, interested and affected parties, landowners with property in proximity or within PULL, and the general public. The EA was open for public comment from September 1, 2023, to October 15, 2023. A press release was issued on September 1, 2023, which announced that the EA was available for public review and invited comments online through the Planning, Environment, and Public Comment (PEPC) system or by U.S. mail. A summary of public comments and responses to all substantive comments are included in Attachment A.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the September 2023 EA and associated decision file. To the extent necessary, relevant sections of the plan and EA are incorporated by reference below. A non-impairment determination is included in Attachment B.

Selected Action and Rationale

The EA analyzed one alternative, the NPS proposed action. Based on the analysis, the NPS selected the proposed action as the alternative for implementation because it best meets the purpose and need for action, does not result in significant impacts on to park resources, and fulfills the requirements in the Cooperative Management Agreement (CMA). Under the selected action, NPS and IDNR would continue to work together to preserve resources, engage visitors, and cooperatively manage park areas as prescribed by the CMA. The JGMP identifies management areas, defines their desired conditions, and outlines management strategies to achieve and maintain the desired conditions. A detailed description of the desired conditions and management strategy are included in Chapters 2 and 3 of the JGMP.

Consistent with 43 CFR 46.310(b), the NPS did not include a no-action alternative because it would not be analytically useful, and there are no unresolved conflicts about the selected action with respect to alternative uses of available resources.

MITIGATION MEASURES

The NPS strongly emphasizes avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the NPS will require multiple mitigation measures and best management practices to protect environmental and cultural resources potentially affected by the selected action. Measures to minimize harm will be developed during detailed planning, compliance and permitting for individual components of the selected action.

Authority for these mitigations will come from the following laws and policies:

- NPS Organic Act (16 United States Code [U.S.C.] 1)
- National Park Service *Management Policies* (NPS 2006)
- National Historic Preservation Act (54 United States code [U.S.C.] 306108)

SIGNIFICANCE CRITERIA REVIEW

Consistent with CEQ regulations §1501.3(b), the NPS evaluates the significance of the selected action by evaluating the potentially affected environment and the degree of effect of the action, including both adverse and beneficial effects, effects on public health and safety and effects that would violate Federal, State, Tribal or local laws protecting the environment. The significance determination considers the effects of the selected action on the resources within the park.

Potentially Affected Environment

The plan provides management vision and strategies to improve resource conditions and visitor experiences. Potentially affected resources include historic structures and cultural landscapes, visitor use and experience, and transportation and circulation.

Historic Structures and Cultural Landscapes: The NPS owns only the historic Administration Clock Tower Building, which served as the hub of the former Pullman factory. Surrounding the Administration Clock Tower Building is the Pullman State Historic Site. The remainder of the land in the park boundary is owned by the City of Chicago or private owners. In 1998, an arson fire heavily damaged the Administration Clock Tower Building, following which it was partially reconstructed and restored. In 2021, the NPS completed rehabilitation of the Administration Clock Tower Building that created a small visitor center, classroom, and office space on the first floor. At the same time, IDNR completed the remediation and rehabilitation of its 12-acre Car Works grounds surrounding the NPS Administration Building Clock Tower Building. The landscaping, plantings, lighting, and pathways that were designed as a part of the original 1880 plans for the Sites have been substantially altered, such that a cultural landscape true to that period no longer exists.

Visitor Use and Experience: The park boundary includes historic and active residences and businesses. There are several places for visitors to experience Pullman history and resources, including the Historic Pullman Foundation Exhibit Hall, Pullman State Historic Site at the Hotel Florence, the National A. Philip Randolph Pullman Porter Museum, the Pullman House Project welcome center, the historic Greenstone Church, and the Pullman neighborhood itself. The NPS does not own or manage these places. Visitors are encouraged to enjoy PULL's architecture and public spaces while respecting the privacy of Pullman residents and private businesses. With professional guided tours by park staff or partners, and options

for self-led experiences through the community, visitors can learn about the history and significance of the Pullman Company and community.

Transportation and Circulation: The park is located approximately 13 miles south of downtown Chicago and is situated adjacent to the Bishop Ford Expressway (I-94). While public transportation is available via Chicago Metra train and Chicago Transit Authority bus, visitors to PULL primarily arrive by personal vehicle and can experience most of the park within walking distance of the main parking lot adjacent to the Administration Clock Tower Building. The community was originally designed as a walkable community which puts many points of interest within walking distance of the parking lot and visitor center. However, due to further distance and limited pedestrian focused access, the northern portion of the park is more frequently experienced by vehicle.

Degree of Effects of the Action

The National Park Service considered the following actual or potential project effects in evaluating the degree of the effects (40 CFR 1501.3(b)(2)) for the selected action.

a. Beneficial and adverse, and short- and long-term effects of the selected action.

Under the selected action, there would be permanent beneficial impacts to historic structures and cultural landscapes through the development of partnerships, growth of education and interpretation opportunities, and additional research, monitoring and inventorying at the park. These actions would improve the park's ability to preserve historic structures and cultural landscapes in accordance with the Secretary of Interior's *Standards and Guidelines for Historic Preservation* and Director's Order 28: Cultural Resource Management. Under the selected action, through the establishment of desired conditions, the historic character of PULL would be maintained while allowing for appropriate rehabilitation, reuse and redevelopment which would benefit historic structures. There are no anticipated adverse impacts on historic structures and cultural landscapes from the selected action.

The selected action also improves the visitor experience. Under the selected action, visitors would have the opportunity to experience the park in new ways, be provided with recreational and educational opportunities, and have easier and safer access to facilities. This would result in a long-term beneficial impact to visitor use and experience. The NPS would use the visitor use management strategies outlined in the selected action to strategically assess existing visitor opportunities and experiences and respond proactively to new opportunities and trends. This would in turn enhance visitors' connection with and understanding of the significance and fundamental resources and values of PULL.

The selected action also supports local transportation groups in their efforts to improve circulation throughout the community. Any action undertaken by the NPS would improve visitors' and residents' ability to navigate into and out of the community, travel to points of interest, and gain an immersive experience within PULL. There are no anticipated adverse impacts to visitor experience, transportation or circulation under the selected alternative.

As described above, the selected action will result in long-term beneficial effects to park resources over the life of the plan. The selected action will fulfill the park's purpose and support the park's fundamental resources and values. The NPS did not identify any significant adverse direct, indirect or cumulative effects from implementing the selected action.

b. Degree to which the selected action affects public health and safety.

The selected alternative will positively affect public health and safety by increasing the awareness and development of pedestrian oriented infrastructure including crosswalks at major streets. There are no other anticipated impacts to health or safety and no adverse effects on health or safety from the selected action.

c. Effects that would violate federal, state, tribal, or local law protecting the environment.

The selected alternative does not threaten or violate applicable federal, state, tribal, or local environmental laws or requirements imposed for the protection of the environment. The park consulted with the U.S. Fish and Wildlife Service (USFWS), Illinois State Historic Preservation Office, and traditionally associated Tribal Nations during the analysis of the selected action. These consultation efforts are summarized below:

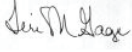

- **Government to Government Consultation:** Letters inviting federally recognized Indigenous Nations to consult on the JGMP were sent on July 28, 2023. NPS also consulted with traditionally associated Indigenous Nations on the EA and will continue to consult throughout implementation of the final JGMP pursuant to requirements of 36 CFR 800, executive orders and agency management policies.
- **U.S. Fish and Wildlife Service:** The NPS consulted with the USFWS using the Information Planning and Consultation (IPaC) tool on July 17, 2023, in compliance with Section 7 with the Endangered Species Act of 1973 (ESA). The USFWS replied on July 24, 2023, via email indicating “based on the project location and information that you provided in IPaC, you should make ‘no effect’ determinations for all the species listed in the county. The project location is in a highly developed area and there is not habitat (or records) for Federally listed species on your species list.”
- **State Historic Preservation Office:** The NPS is required by 36 CFR 800 and Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended (16 USC 470, et seq.), to consider the effect of any undertaking on properties listed in or eligible for listing in the National Register of Historic Places. On August 07, 2023, NPS sent a letter to the Illinois State Historic Preservation Office (SHPO) with a copy of the EA for review and comment. The NPS will coordinate with the SHPO in the development of mitigation measures for historic and archeological resources through the use of a memorandum of agreement.

The SHPO responded on September 5, 2023, stating that the JGMP and EA will not adversely affect any historic resource. Additionally, they provided corrections and updates regarding Illinois Law and Policy and the Illinois Comprehensive Environmental Review Process that do not affect the section 106 determination. These edits have been incorporated through errata (Attachment A).

FINDING OF NO SIGNIFICANT IMPACT

Based on the information contained in the EA, I have determined that the selected action does not constitute a major federal action having a significant effect on the human environment. Therefore, an environmental impact statement will not be required.

This finding is based on consideration of the Council on Environmental Quality criteria for significance(40 Code of Federal Regulations [CFR] 1501.3 [b] (2023)), regarding the potentially affected environment and degrees of effects of the impacts described in the EA (which is hereby incorporated by reference) and as summarized below.

Recommended:	<div><div>Digitally signed by TERI GAGE Date: 2023.11.17 09:55:37 -08'00'</div></div> <div>Teri M. Gage Superintendent Pullman National Historical Park</div>	<div></div> <div>Date</div>
Approved:	<div><div>Digitally signed by HERBERT FROST Date: 2023.11.24 13:02:11 -08'00'</div></div> <div>Herbert C. Frost, Ph.D. Regional Director National Park Service DOI Regions 3, 4, and 5</div>	<div></div> <div>Date</div>

Attachment A: Public Comment Summary and Errata

On September 1, 2023, Pullman National Historical Park released the Pullman Joint General Management Plan Environmental Assessment (EA) for public review and comment. A press release was issued on September 1, 2023, announcing that the document was available for public comment for 45 days. The public was invited to provide comments online through the Planning, Environment, and Public Comment (PEPC) system at <https://parkplanning.nps.gov/pulljgmpea> or to mail comments to PULL.

The National Park Service received six correspondences through the NPS Planning, Environment and Public Comment website and one correspondence delivered to the superintendent's office.

RESPONSES TO PUBLIC COMMENTS

This section includes responses to all substantive and some non-substantive public comments on the EA. The comments do not change the outcome of the impact analysis, nor do they affect the final decision documented in the Finding of No Significant Impact. Minor typographical errors in the EA are corrected through the errata. Substantive comments are those that:

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the NEPA document; or
- cause changes or revisions in the proposal.

EA Comments

COMMENT: One comment expressed concern that construction or preservation actions taken by partners could impact archeological resources.

NPS RESPONSE: The EA only address NPS impacts. Actions taken by partners will require compliance with appropriate laws and policies prior to implementation.

COMMENT: One commenter expressed that the socioeconomic analysis did not align with the rhetoric of local politicians, which indicates that the area should be experiencing economic growth.

NPS RESPONSE: The EA addresses the impacts of the JGMP. While there may be an increase in local economic growth, the JGMP will not have a direct impact on socioeconomics. As stated on page 2-11 there are no anticipated effects on regional income and jobs from the implementation of the JGMP. Many positive changes are occurring outside of the JGMP that may cause local economic growth.

COMMENT: One commenter expressed concern that the visitor use and experience impact analysis

did not account for self-led tourists not respecting the privacy of Pullman residents and businesses.

NPS RESPONSE: Self-led experiences are not specifically prescribed through the management actions of the JGMP. Currently and in the future, it is anticipated that some visitors will participate in self-led experiences. As stated in the EA, visitors are encouraged to enjoy the park while respecting the privacy of residents and businesses.

COMMENT: One commenter asked about the impacts that road improvement projects will have on historic structures and features.

NPS RESPONSE: Street improvement projects are under the jurisdiction of the City and County and these agencies will be required to follow all applicable laws and policies prior to implementation.

JGMP Comments

COMMENT: Commenters expressed concerned about the preservation of historic buildings not owned by the NPS and requested NPS assistance and intervention.

NPS RESPONSE: The NPS offers technical assistance through the National Historical Landmarks Program and may also offer matching financial support to significant historic structures. The NPS works closely with the City of Chicago Landmarks Commission, the IL State Historic Preservation Office, and other government groups in adherence with the National Historic Landmark District designation.

COMMENT: One commenter supports specific inclusion of a cultural trail be included in the JGMP.

NPS RESPONSE: The JGMP supports the development of a cultural trail. Specific trail design is outside the scope of the plan.

COMMENT: Commenters expressed a desire to experience a Pullman Railcar and that a railcar should be placed on-site.

NPS RESPONSE: The JGMP specifically supports the placement of a railcar in the Carworks zone. The IDNR visioning document (Appendix D of the JGMP) provides some specifics on how this could be accomplished.

COMMENT: Commenters expressed that the park should connect visitors with similar stories and locations outside of the park boundaries.

NPS RESPONSE: Table 7 of the JGMP supports this idea. The Pullman Long Range Interpretive Plan includes guidance for working with partners toward promoting connected sites. Specifics are out of the scope of the JGMP.

COMMENT: Commenters expressed concern that the story of the Sleeping Car Porters was not fully

addressed in the management actions section of the JGMP.

NPS RESPONSE: The NPS is mandated to tell the story of the Sleeping Car Porters and has engaged with the National A. Philip Randolph Pullman Porter Museum to tell this story. The Pullman Foundation Document identifies the Pullman Porter story in three of seven park significance statements. The Long-Range Interpretive Plan (LRIP) identifies the Pullman Porters as an interpretive theme and outlines the National A. Philip Randolph Pullman Porter Museum as a principal partner. The LRIP also includes guidance on telling the story of the Sleeping Car Porters through partnerships.

COMMENT: Commenters suggested a more active approach by NPS to acquire significant properties.

NPS RESPONSE: At this time the NPS is not actively acquiring any properties within the boundary of the park. The JGMP does not restrict future acquisition, and as situations change acquisition may be reassessed.

COMMENT: One commenter recommended a boundary modification to include the footings of the water tower and gas house.

NPS RESPONSE: The foundation of the Pullman Water Tower is within the Pullman National Historic Landmark Boundary and the National Historic Landmarks Program is available to support the owner of this property. The site itself does not fulfil any need or desired conditions identified in the plan.

The Pullman Gas House is outside the Pullman National Historical Park and National Historic Landmark boundaries. This area is not under consideration for inclusion in the park boundary. The site is a privately owned and development as a commercial area is currently underway.

COMMENT: Commenters expressed concerns about safety and that the plan primarily focuses on infrastructure safety not social safety.

NPS RESPONSE: On page 1-16, visitor safety issues are listed and the need for a safety plan is identified. However, the JGMP does not address safety plan specifics and further planning or coordination with partners and local law enforcements may still be required. This issue is carried forward from the Pullman Foundation Document which identifies the need to address safety for public spaces and services within the historical park boundary.

COMMENT: One commenter requested that the original landscape designed by Nathaniel Barrett should be restored throughout the park.

NPS RESPONSE: The decision to use landscaping reminiscent but not identical to the original plantings comes from NPS and IDNR mandates to maintain sustainable and locally friendly environments. The original plantings may not make sense in terms of water use, insect and other wildlife habitat, and maintenance costs.

ERRATA

This errata contains minor revisions to the JGMP and EA as a result of comments received during the public review process, as well as other corrections. These edits do not result in substantial modifications to the selected action, and do not change the environmental analysis. It has been determined that the revisions do not require additional environmental analysis. The page numbers referenced are from the September 2023 JGMP EA. Additions to text are underlined, and deleted text is shown by ~~strikeout~~.

Page 1-4

Section 6 of the Historic Preservation Act (20 ILCS 3405/6) designated the Pullman Car Works and Hotel Florence (and Annex) as a State Historic Site. Section 3.1 of the Historic Preservation Act (20 ILCS 3405/3.1) abolished the Historic Preservation Agency and transferred, effective August 3, 2018, all powers, duties, rights, and responsibilities of the Historic Preservation Agency, except those functions relating to the Abraham Lincoln Presidential Library and Museum, to IDNR.

~~The State Historic Site was created through 20 ILCS 3420/6 (Illinois State Agency Historic Resources Preservation Act) designating the Pullman Car Works and Hotel Florence (and Annex) as a State Historic Site. On August 3, 2018 (the effective date of Public Act 100-695), the Historic Preservation Agency was abolished and all powers, duties, rights, and responsibilities of the Historic Preservation Agency, except those functions relating to the Abraham Lincoln Presidential Library and Museum, were transferred to the Department of Natural Resources.~~

The IDNR is authorized by state statute ~~statue~~ # 20 ILCS 3405 to protect and promote the Pullman SHS under the following:

Page 1-5

Additionally, jurisdiction over the Pullman SHS to IDNR, and Sections 16.b and 16.u give IDNR the power “to take all measures necessary to erect, maintain, preserve, restore, and conserve all State Historic Sites and State Memorials...” and “to engage in marketing activities designed to promote the sites and programs administered by the Department.... All income from marketing activities shall be deposited into the Illinois Historic Sites Fund.

The Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420) establishes a mandatory review and consultation process by the Illinois State Historic Preservation Office of work proposed for state-owned historic property, including the Pullman SHS.

~~Applicable laws and policies related to IDNR resource management include 20 ILCS 3435 Archaeological and Paleontological Resources Protection Act, 520 ILCS 10 Illinois Endangered Species Protection Act, 525 ILCS 30 Illinois Natural Areas Preservation Act, and 20 ILCS 830 Interagency Wetland Policy Act of 1989.~~

Applicable laws and policies related to IDNR resource management include 20 ILCS 3435, Archaeological and Paleontological Resources Protection Act; Human Remains Protection Act, signed August 4, 2023, and not yet codified; 20 ILCS 860, Outdoor Recreation Resources Act; 520 ILCS 10, Illinois Endangered Species Protection Act; 525 ILCS 30, Illinois Natural Areas Preservation Act; and 20 ILCS 830, Interagency Wetland Policy Act of 1989.

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IDNR Vision – Pullman Car Works/Hotel Florence (2020): This document (appendix D) outlines a clear vision for the future of the SHS. This vision document was released to the public during the JGMP process and was integrated into all facets of the JGMP.

NPS Signage and Wayfinding Plan (2021): This plan was created by the U.S. Department of Transportation Volpe Center to guide signage within the NHP boundary and to guide wayfinding to the Sites. ~~The proposed~~ Proposed action is aligned with this plan with the goal of creating a consistent signage style throughout the NHP.

NPS and IDNR Cooperative Management Agreement (2021): The cooperative management agreement (Appendix C) is a 10-year agreement between the NPS and ~~the~~ IDNR for the cooperative management of the Sites. It defines the roles and responsibilities of each agency to fulfill the missions of both sites more effectively.

Page 1-19

The execution of this vision was revisited through ~~in~~ Positioning Pullman 2.0 in 2019.

Page 1- 33

Table 11. Connecting Pullman

Page 1-35

The current management action for all evaluated properties is that NPS and IDNR would support management by partners and offer support and technical assistance as time and funding allowed.

Page 1-38

South Gateway

Current Status: The corner of 115th ~~and~~ Cottage Grove Avenue lies within the Residential Neighborhood management area of the National Historical Park.

Page 2-14

There are several places for visitors to experience Pullman history and resources, including the Historic Pullman Foundation Exhibit Hall ~~Visitor Information Center~~, Pullman State Historic Site at the Hotel Florence, the National A. Philip Randolph Pullman Porter Museum, and the Pullman neighborhood itself.



November 10, 2023

Attachment B:
DETERMINATION OF NON-IMPAIRMENT
Pullman Joint General Management Plan
ENVIRONMENTAL ASSESSMENT
Pullman National Historical Park, Illinois

National Park Service (NPS) *Management Policies 2006* (Section 1.4) requires analysis of potential effects to determine whether proposed actions will impair a national park's resources and values. NPS decision makers must always seek ways to avoid or to minimize, to the greatest degree practicable, adverse impacts on park resources and values. The NPS has the management discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of the park, although that discretion is limited by the statutory requirement that the NPS must leave resources and values unimpaired unless a particular law directly and specifically prescribes otherwise.

An impairment is an impact that, in the professional judgment of the responsible NPS decision maker, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

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

An impact may be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values, and it cannot be further mitigated.

Impairment may result from visitor activities, NPS administrative activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park. An impairment determination is not made for subject matters such as visitor experience, public health and safety, socioeconomics, environmental justice, land use, and park operations because impairment determinations only relate to resources and values that maintain the park's purpose and significance. Additionally, this determination applies only to NPS lands.

Historic and Cultural Resources

The selected action would maintain historic buildings in their current condition or improve them by

appropriate restoration practices. The plan does not provide specific details and the actions would be taken by partners on non-NPS property. There would be no adverse effect to historic properties under Section 106 of the National Historic Preservation Act. Therefore, the selected action would not constitute an impairment to cultural resources.

Conclusion

As guided by the expected outcomes noted above, implementing the selected action does not constitute impairment of any resource or park value whose conservation is: (1) necessary to fulfill specific purposes identified in 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 goal in the Park's general management plan or other relevant NPS planning documents as being of significance. This conclusion is based on the consideration of the purpose and significance of PULL, a thorough analysis of the environmental impacts described in the environmental assessment, relevant scientific studies, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of NPS.