

National Park Service
U.S. Department of the Interior

Andersonville National Historic Site
Georgia



FINDING OF NO SIGNIFICANT IMPACT

December 6, 2023

**GRADING OF SECTIONS J AND Q TO CONTINUE INTERMENTS IN THE NATIONAL CEMETERY
Andersonville National Historic Site**

Recommended:

Gia Wagner
Superintendent, Andersonville National Historic Site

Date

Approved:

Mark A. Foust
Regional Director, Interior Region 2, South Atlantic - Gulf

Date

Introduction

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine potential impacts associated with the re-grading and improvement of drainage in Section Q and a small portion of Section J within the national cemetery at Andersonville National Historic Site. Andersonville National Cemetery and cultural landscape are determined eligible to the National Register of Historic Places.

Andersonville National Cemetery is reaching capacity for easily accessible grave sites. The largest unused area of the cemetery, Section Q, located in the southeast portion of Andersonville National Cemetery, is currently unusable for burials due to the steep slope of the terrain. Section Q could hold roughly 700 gravesites and allow the national cemetery to remain open to new burials for the foreseeable future.

The purpose in proposing action is to:

- Provide burial space for our nation's veterans and their families.
- Provide for staff safety by reducing slopes.
- Maintain the natural contour of the topography and cultural landscape, and
- Improve drainage in Section Q.

The EA analyzed 2 alternatives; the no-action alternative which provides a basis for comparing the environmental impacts of the action alternative, and one action alternative (alternative 2) that would implement the regrading of section Q to allow for burials into the future.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis found in the *Environmental Assessment-Andersonville National Cemetery Rehabilitation Project-Drainage Contour Grading Section Q, July 2023*. The EA was made available to the public (August 1, 2023, through August 31, 2023); and no comments were received.

The EA was prepared in accordance with NEPA; the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508); NPS Director's Order #12 (DO-12): Conservation Planning, Environmental Impact Analysis, and Decision-Making; and the NPS NEPA Handbook (NPS 2015).



Figure 1: Location of Proposed Action, Andersonville National Cemetery

Selection of the Preferred Alternative / Proposed Action

The preferred alternative was selected for implementation following analysis of the park mission, current conditions, predicted impacts to the human environment, and the purpose of the national cemetery. The Proposed Action consists of cutting and filling the existing slopes within Section Q and re- grading the area to obtain a 4 to 1 slope running from the west cutting east across the site. This will create one large, terraced area and maximize the balancing of the cut and fill required to reach final design grade elevations. The import and export of fill will not be required. The total acreage of the project area is approximately 2.7 acres, of which approximately 2.36 acres will be disturbed. The limits of disturbance and limits of construction includes the construction laydown /staging area which is located in a gravel parking area east of the rostrum and will not be visible to the public. Heavy equipment anticipated to be utilized includes an excavator, end-loader, and grader. The construction period of performance is estimated to be no more than 90 days.

The EA also evaluated the No Action alternative in accordance with NEPA guidelines and CEQ requirements. Under this alternative, Section Q would not be excavated, filled, or graded. No new disturbance to soils or vegetation would occur. No additional areas would be impacted, and no additional burial would be added. Since Section Q is the last undeveloped area in the cemetery the No Action Alternative would cause the cemetery to be closed to new interments. Stormwater erosion issues would continue to impact the area to include the potential long-term impacts to the historic cemetery perimeter wall. Cemetery operations and grounds maintenance activities would also continue to be negatively impacted. The No Action Alternative would not meet the purpose and need for the project.

Rationale for the Selected Alternative

The Selected Alternative best meets the project purpose and need to:

- Provide burial space for our nation's veterans and their families.
- Provide for staff safety by reducing slopes.
- Maintain the natural contour of the topography and cultural landscape, and
- Improve drainage in Section Q.

A full range of ideas were considered, including terracing or the major removal or addition of soils. While those ideas would provide benefits, they all failed to meet the condition to maintain the cultural landscapes contours and topography. Therefore, the selected alternative was chosen for analysis.

Finding of No Significant Impact: Why the Selected Alternative will not Significantly Affect the Quality of the Human Environment

As described in the EA (pages 32 through 50), the selected alternative has the potential to result in negligible or no impacts on park resources provided the prescribed mitigation measures are followed. Overall, the short-term negligible impact to visitor experience from construction operations (due to noise and bare soils) is far outweighed by the long-term visitor experience benefits of having the cemetery prepared for burials as historically intended.

Mitigation Measures

The NPS places a strong emphasis on avoidance, minimization, and mitigation of impacts. To help ensure that the construction and operational activities of the selected alternative protect natural, cultural, and social resources and the quality of the visitor experience within the national cemetery, the following potential impacts were analyzed and mitigations for any types of impacts were proposed and will be implemented.

A decrease in stormwater quality has a higher chance of occurrence during the filling, grading and excavation activities associated with the Proposed Action. Construction will not take place during rainy conditions. During construction, silt fencing will be installed to prevent any sediment/soils from reaching the drains. Native cover crops will be planted following construction.

Soil disturbances would occur during excavation, filling, and grading activities. Topsoil is underlain by a clay layer in the national cemetery. Topsoil will be removed prior to grading and will be replaced following completion.

The Proposed Action has the potential to affect archaeological and cultural resources, if encountered. An archeological monitor will be onsite during all soil removal operations. If artifacts or remains are discovered, operations will cease, the SHPO will be consulted, and further investigations will take place.

The proposed action will cause a temporary impact to visitor experience to include temporary interruption in transportation patterns and temporary changes in scenic views. The work will not be done during funerals and will be timed to avoid major cemetery events to minimize visitor impacts.

Construction activities will cause a temporary increase in noise in the project area. Operations will not take place during funerals or surrounding events.

The proposed mitigations are based on best practices for earth moving and the normal operation of the cemetery. No equipment is ever used during funerals or events and this project is no exception. Overall, the mitigations required for this project are minimal and easily implementable.

The above mitigations will be implemented, and overall, cultural resources will be positively impacted by execution of the selected alternative in that the project will complete the intended layout for the national cemetery and improve drainage which protects the cultural landscape and the historic cemetery wall.

Public Involvement/Agency Consultation

During preparation of the EA, the NPS consulted with federal and state agencies, tribes, interested and affected parties, and the public to ensure any potential impacts were considered.

Public Engagement

The EA was available on the NPS Planning, Environment, and Public Comment (PEPC) System website for public review and comment from August 1, 2023, through August 31, 2023. The purpose of the public review period was to seek public input on the discretionary decision-making process. NPS announced the open comment period through social media and press release. No comments were received.

Traditionally Associated American Indian Tribes and Groups

On June 11, 2021, the NPS initiated consultation with the federally recognized Tribes after the arrival of the park's new superintendent. The initial contact by letter to the thirteen potentially associated Tribes resulted in one Tribe not being interested in consulting with the park and no other responses. In 2022, the same Tribes and Tribal Historic Preservation Officers were contacted again by letter, and this resulted in two Tribes interested in consulting with the park on projects. In 2023, two Tribes were sent the EA by mail and followed up with telephone calls by the superintendent. No comments were received by the Tribes. The other 10 Tribes were notified regarding the availability of the EA, but no Tribes responded.

U.S. Fish and Wildlife Service

The U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) was used to determine potential presence of threatened or endangered species in the project area. Six species were identified by IPaC as possibly in the area. The species are listed below along with their potential for presence in the park:

- *Grus americana*. Whooping crane are not present within Andersonville National Historic Site, therefore consultation was not required.
- *Macrochelys temminickii*, Alligator Snapping Turtle are not present within Andersonville National Historic Site, therefore consultation was not required.
- *Danaus plexippus*, Monarch butterflies are ubiquitous in this area, they are not regular visitors to the lawn grasses of the national cemetery, therefore consultation for this species was not required.
- *Oxyppolis canbyi*, Canby's dropwort is a wetland species, and is not present in the national cemetery as it does not contain wetlands, therefore consultation for this species was not required.
- *Silene polypetela*, Fringed campion does not occur within the national cemetery nor the surrounding woodlands, therefore consultation for this species was not required.

- *Trillium reliqueuum*, Relict trillium does not occur within the national cemetery and therefore consultation was not required.

The manicured lawns of the national cemetery are not attractive to these species and have not been found in the area. None of the species listed have critical habitat in the project area and the project, as planned, will have no effect on these 6 species nor any migratory birds.

Georgia Office of Historic Preservation

Consultation with the Georgia Office of Historic Preservation (SHPO) about this project began in March of 2018 after previous consultation on updated cemetery operations at Andersonville National Cemetery in November 2017. The park supplemented information that was previously provided as more information was available. In May of 2018 archeological reports were submitted for the project area. In November 2020 clarification was sent to the SHPO about the inclusion of small portions of Section J that would also be involved in the overall grading project. The 70% design drawings were sent to the SHPO in July 2022 for review and they determined that the actions proposed would have no adverse effect to properties listed in the National Register. In September 2022 the results of a geotechnical survey were submitted for review. In August 2023 the SHPO reaffirmed that the project would have no adverse effect to properties listed in the National Register. Consultation letters are found in Appendix B to this FONSI.

Conclusion

Based on the environmental impact analysis contained in the EA, NPS has determined that the selected alternative (Alternative 2, Proposed Action) does not constitute a major federal action that will significantly affect the quality of the human environment or significantly affect human health and safety. The selected alternative will not violate any Federal, State, Tribal, or local laws protecting the environment. In addition, the selected alternative is not without precedent, nor is it similar to an action which normally requires an environmental impact statement. No connected actions with potential significant impacts were identified. Therefore, in accordance with NEPA and regulations of the CEQ, an Environmental Impact Statement will not be prepared. The selected alternative will be implemented as soon as practicable, as funding is available.

DETERMINATION OF NO IMPAIRMENT

Andersonville National Cemetery Rehabilitation - Drainage/Contour Grading in National Cemetery Section Q Project, Andersonville, Georgia

This determination of non-impairment has been prepared for the Andersonville National Cemetery Rehabilitation - Drainage/Contour Grading In National Cemetery Section Q Project, Andersonville, Georgia, as described in the Finding of No Significant Impact.

The National Park Service (NPS) Organic Act of 1916 directs the NPS to "conserve the scenery, natural, and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (54 USC 100101). NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values:

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

An action constitutes impairment when its impacts "harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values" (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the "particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an 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.
- 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 (NPS 2006, Section 1.4.5).

An impact would 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.

The park resources and values that are subject to the non-impairment standard include:

The historic prison site and associated resources which encompasses all the components of the prison camp officially named Camp Sumter. These include the Star Fort, earthworks, wells, potential archeological resources, stockade branch, and the Providence Spring.

The National Cemetery preserves, protects, and honors the graves of the nearly 13,000 prisoners who died at Camp Sumter as well as nearly 8,000 graves of deceased veterans from every subsequent conflict in which the United States has been engaged. Other physical resources include the cemetery cultural landscape and its associated features, such as the grave markers, the cemetery wall, and the rostrum.

Commemorative monuments encompass all the physical resources dedicated to commemorating the captives who were confined at Andersonville, those who died, prisoners of war from subsequent wars, and individuals and groups who worked to preserve the historic landscape. These resources include all cemetery and prison site monuments and the POW commemorative walkway.

The commemorative atmosphere of Andersonville National Historic Site fosters an awareness of patriotism, sacrifice, duty, honor, country, and civic education. The national historic site creates a setting in which former prisoners of war can unite with one another through a shared experience and other Americans can gain an appreciation and understanding of the constant relevancy of this experience.

The artifacts and other collections contained in the National Prisoner of War Museum provide an outstanding opportunity for education and research to further the understanding of the history of Andersonville and the larger history of prisoners of war throughout American history. The museum courtyard provides a poignant reminder of the sacrifices of prisoners of war throughout U.S. history and a moving portrayal of resolve in the face of despair.

Implementation of the project will provide the needed burial space for our nation's veterans and their families, provide for staff safety by reducing slopes, maintain the natural contour of the topography and cultural landscape, and improve drainage in Section Q. The analysis in the EA determined that the selected alternative will result in negligible or no impacts on park resources provided the prescribed mitigation measures. There may be a decrease in stormwater quality due to the filling, grading and excavation activities associated with the Proposed Action, therefore, construction will not take place during rainy conditions and silt fencing will be installed to prevent any sediment/soils from reaching the drains. Native cover crops will be planted following construction to stabilize soils. An archeological monitor will be onsite during all soil removal operations. If archaeological resources are encountered, all construction will cease and the SHPO will be consulted. There will be some noise impacts due to construction, but the noise will only occur during construction and will not be allowed during funerals or events.

Because there will be negligible impacts to park resources, the above mitigations will be implemented, and overall, cultural resources will be positively impacted by implementation of the selected alternative, there will be no impairment to park resources due to the implementation of this project.

Appendix B SHPO Consultation Documents

SHPO Letter 10/21/2021 171201-001 RE: Archeological Report

SHPO Letter 7/26/2022 171201-001 RE: 70% Design for Project

SHPO Letter 8/29/2023 171201-001 RE: Environmental Assessment

Brian P. Kemp
Governor



Christopher Nunn
Commissioner

October 20, 2021

Bridget Beers
Museum Curator
Andersonville National Historic Site
496 Cemetery Road
Andersonville, Georgia 31711

**RE: Andersonville NHS: FY 2018-2022 Maintenance Operations,
496 Cemetery Road, Andersonville
Macon County, Georgia
HP-171201-001**

Dear Ms. Beers:

The Historic Preservation Division (HPD) has received the archaeological survey prepared by the Southeast Archaeological Center and dated September 17, 2021. Our comments are offered to assist the National Park Service (NPS) and Andersonville National Historic Site (NHS) in complying with the provisions of Section 106 of the National Historic Preservation Act (NHPA).

Based on the information contained in the report, HPD concurs that no anomalies are consistent with significant cultural resources. Therefore, it is HPD's opinion that opening Sections L, N, and a portion of E for burial, as proposed, will have **no adverse effect** to historic properties, including the National Register of Historic Places (NRHP)-listed Andersonville NHS/9MA87, as defined in 36 CFR Part 800.5(d)(1). However, HPD concurs with the recommendation for staff to continue to use caution while excavating new grave shafts.

HPD looks forward to continued consultation regarding the subject project, as applicable, and in accordance with the NPS Nationwide Programmatic Agreement, and working with you as this project progresses.

Please refer to project number **HP-171201-001** in any future correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact me at jennifer.dixon@dca.ga.gov or (404) 486-6376.

Sincerely,

Jennifer Dixon, MIIP, LEED Green Associate
Program Manager
Environmental Review & Preservation Planning

Cc: Allison Slocum, River Valley Regional Commission
Jodie Mays, Andersonville NHS



Brian P. Kemp
Governor



Christopher Nunn
Commissioner

July 26, 2022

Bridget Beers
Museum Curator
Andersonville National Historic Site
496 Cemetery Road
Andersonville, Georgia 31711

**RE: Andersonville NHS: FY 2018-2022 Maintenance Operations; Grade Sections J and Q
Macon County, Georgia
HP-171201-001**

Dear Ms. Beers:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the National Park Service and Andersonville National Historic Site (NHS) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of grading Section Q within the cemetery portion of Andersonville NHS. HPD would like to note that while the submittal mentions Section J, no project documentation was provided for this section; therefore, HPD is only commenting on Section Q. Based on the information provided, HPD concurs that the project is within the National Register of Historic Places (NRHP)-listed Andersonville NHS and that the cemetery and site 9MA87/Prison Camp are contributing. Additionally, while the results of the previous archaeological survey for Section Q were negative, the project is within the Prison Camp area and is immediately adjacent to intact portions of the inner stockade wall just below the plow zone (Prentice 1990). Therefore, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties that are listed in the NRHP, as defined in 36 CFR Part 800.5(b), **provided the following condition is met:**

1. A professional meeting the Secretary of the Interior's (SOI) Professional Qualifications Standards for Archaeology should monitor ground-disturbing activity during grading of the area within the Prison Camp. If archaeological resources are located, ground disturbance should halt until the SOI-qualified archaeologist can assess and document the nature of the artifacts to the extent possible and contact our office for concurrence prior to continuing additional ground-disturbing activity. A monitoring report should be submitted to HPD for review and comment.

Please refer to project number **HP-171201-001** in any future correspondence on this project. If we may be of further assistance, please do not hesitate to contact me at jennifer.dixon@dca.ga.gov or (404) 486-6376.

Sincerely,

A handwritten signature in blue ink that reads "JD" with a stylized flourish.

Jennifer Dixon, MHP, LEED Green Associate
Division Director
Deputy State Historic Preservation Officer

cc: Allison Slocum, River Valley Regional Commission



Brian P. Kemp
Governor



Christopher Nunn
Commissioner

August 28, 2023

Bridget Beers
Museum Curator
Andersonville National Historic Site
496 Cemetery Road
Andersonville, Georgia 31711

**RE: Andersonville NHS: FY 2018-2022 Maintenance Operations; Grade Sections J and Q
Macon County, Georgia
HP-171201-001**

Dear Ms. Beers:

The Historic Preservation Division (HPD) has received the additional information submitted concerning the above referenced project, including the report entitled *Environmental Assessment (EA), Andersonville National Cemetery Rehabilitation Project, Andersonville, Georgia, Drainage Contour Grading in National Cemetery Section Q* dated July 2023. Our comments are offered to assist the National Park Service (NPS) and Andersonville National Historic Site (NIHS) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of grading Sections J and Q within the cemetery portion of Andersonville NHS. The project was previously determined to have no adverse effect to the National Register of Historic Places (NRHP)-listed Andersonville NHS, which includes the contributing cemetery and archaeological site 9MA87/Prison Camp, with one condition, as noted in our letter dated July 26, 2022. The scope of work (SOW) for Section J was provided for review, and as noted in our letter dated October 20, 2022, the project continued its no adverse effect determination.

The current submitted information includes the above-referenced report covering project activities in Section Q. Based on the information provided, HPD concurs that it appears no anomalies representing either graves or other man-made features are located within Section Q. Therefore, it continues to be HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its area of potential effects (APE), as defined in 36 CFR Part 800.5(d)(1), **provided Condition 1, noted in our letter dated July 26, 2022, is met.**

Please refer to project number **HP-171201-001** in any future correspondence on this project. If we may be of further assistance, please contact me at Stacy Rieke@dca.ga.gov or (470) 522-7979 or Joshua Foster, Compliance Review Archaeologist, at Joshua.Foster@dca.ga.gov or (404) 486-6396.

Sincerely,

A handwritten signature in black ink that reads "Stacy Rieke".

Stacy Rieke, MHP
Program Manager
Environmental Review and Preservation Planning

cc: Allison Slocum, River Valley Regional Commission
Rebecca White, DCA Regional Services, Region 8

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