



National Park Service
US Department of the Interior
Birmingham Civil Rights National Monument
Alabama

FINDING OF NO SIGNIFICANT IMPACT
Birmingham Civil Rights National Monument

General Management Plan & Environmental Assessment

Recommended:

Kristofer Butcher
Superintendent, Birmingham Civil Rights National Monument

Date

Approved:

Mark A. Foust
Regional Director, Interior Region 2, National Park Service

Date

FINDING OF NO SIGNIFICANT IMPACT

Environmental Assessment for General Management Plan

US Department of the Interior National Park Service Birmingham Civil Rights National Monument Alabama

Background

The National Park Service (NPS) prepared a general management plan (GMP) and environmental assessment (EA) for the Birmingham Civil Rights National Monument (national monument or monument) in Birmingham, Alabama. The national monument was created by presidential proclamation in 2017 to commemorate, preserve, and interpret the struggle for human and civil rights that occurred in Birmingham in the 1950s and 1960s. As a NPS new park unit, the national monument requires a GMP—a broad document, specific to the national monument that identifies long-term goals for the monument and guides management of the visitor experience, monument facilities, and operations. In compliance with the National Environmental Policy Act (NEPA), the NPS prepared an EA to examine alternatives and environmental impacts associated with the alternatives presented in the GMP.

The GMP is needed to fulfill a park planning priority for resource preservation and facility asset management and to address legal and policy requirements identified in the National Parks and Recreation Act of 1978 [Public Law 95-625] and 54 United States Code [USC] 100502. The primary physical resource under the NPS's care at the monument is the A.G. Gaston Motel (Gaston Motel), which needs restoration and rehabilitation before it can be opened to the public. Current facilities do not meet the goals of the national monument or its partner organizations or the needs of visitors. A historic structure report (HSR) and cultural landscape report (CLR) were completed that outline a plan for restoration of the motel (Lord Aeck Sargent 2016; WLA Studio 2019). A GMP was developed to incorporate the recommendations within these reports, address future development needs, and serve as the implementation plan for the desired conditions and management strategies identified during the public engagement process.

Furthermore, the national monument has multiple community partners, and the NPS needs to formalize these partnerships with agreements to coordinate and accomplish the shared goals and purpose of the national monument, including consistent visitor experiences, accessibility, interpretation strategies and programming, transportation and wayfinding, connectivity between resources, security issues, collections management, and economic development opportunities within the national monument and neighboring community. The GMP will serve as one of the guiding documents for engaging the community, formalizing partnership agreements, facilitating collaboration, and coordinating future activities.

Preferred Alternative and Rationale for the Decision

The NPS analyzed two alternatives in detail in the EA—the no-action alternative and one action alternative. Based on this analysis, the NPS selected alternative 2: the rehabilitation and restoration of the A.G. Gaston Motel; the implementation of desired conditions and management strategies at the Birmingham Civil Rights National Monument; and the proposal for expansion of the monument boundary to include The Historic Bethel Baptist Church, Parsonage, and Guard House. This alternative has been

chosen for implementation because it best meets the purpose of and need for action without significant impacts on park resources. Alternative 2 will include a formal preservation strategy in coordination with existing partner agencies that would only occur informally under alternative 1: no action. The selected alternative will also protect the historic fabric of the Gaston Motel and the relationship between the other related resources while expanding partnership opportunities as appropriate to enhance the NPS presence in the community and support education, interpretation, and stewardship initiatives, and enhance visitor experience.

Under the selected alternative, NPS will implement the desired conditions and management strategies defined in the GMP (see chapter 2 of the GMP) for the national monument and preserve, rehabilitate, and restore the Gaston Motel. This alternative will provide a visitor experience that emphasizes the significance of the motel and the city of Birmingham's association with the civil rights movement and call attention to other partner sites (see figure 1 of the EA) and key historic individuals, such as Reverend Fred Shuttlesworth. Figures 2 and 3 of the EA provide a plan view of the first- and second-floor facilities and infrastructure under the preferred alternative for proposed uses and treatments at the Gaston Motel. Under the selected alternative, the treatment recommendations for the motel site will consist of a combination of rehabilitation, restoration, and reconstruction treatments as described in the Secretary of the Interior's *Guidelines for the Treatment of Cultural Landscapes* and *Standards for the Treatment of Historic Properties*. The selected alternative also identifies a proposed expansion of the monument boundary to include The Historic Bethel Baptist Church, Parsonage, and Guard House, consistent with the site boundary included in the national historic landmark nomination (National Register #05000455) (see table 1).

The selected alternative will protect the historic fabric of the Gaston Motel and the relationship between the other related resources while expanding partnership opportunities as appropriate to enhance the NPS's presence in the community and support education, interpretation, and stewardship initiatives, and enhance visitor experience. Overall, the selected alternative will provide for a cohesive interpretive plan to help visitors understand the civil rights story in Birmingham during the 1950s and 1960s through the preserved and restored resources that contribute to the national monument's historic significance. Table 1 provides more detail on the alternative elements and compares the elements under each alternative.

TABLE 1: SELECTED ALTERNATIVE IMPLEMENTATION

Impact Topic/Element	Alternative 2
Boundary Adjustment	The NPS will seek to expand the boundary of the national monument to include The Historic Bethel Baptist Church site. A framework for identifying what additional sites, if any, should be included in the monument boundary will be determined at a later date. A rationale for the inclusion of the church in the monument boundary is included in the GMP (in the "Proposed Boundary Adjustment" section). Any future boundary adjustment would be accomplished through presidential action or Congressional legislation.
Monument Administration	A cooperative agreement between the NPS and the city of Birmingham will detail roles and responsibilities for the shared management of the Gaston Motel. Areas in this agreement could include, but will not be limited to: <ul style="list-style-type: none"> • Short- and long-term care and management per the Preservation and Conservation Easement Deed • Public access, security, and common areas • Public programs and interpretation • Consultation and approval procedures for site development, facility restoration, and uses

Impact Topic/Element	Alternative 2
	<ul style="list-style-type: none"> • Maintenance requirements, scheduling, and responsibilities • Hours of operation, visitor capacity, and visitor capacity monitoring • Special event and public access permitting • Implementation planning, timing, and investment prioritization • Concessionaire contracting <p>A Visitor Services Leadership team, comprising a representative from each partner organization will facilitate collaboration and information sharing among all partners. The team will meet regularly and abide by a charter and strategic plan that clearly defines the roles of each partner, how the roles of various partners relate to each other, and how the NPS and partners will support one another. Formal agreements will be pursued between the NPS/the city of Birmingham and individual partner sites, as appropriate.</p> <p>The NPS will act as a consultant on partner site and city projects and provide assistance in the form of grant writing/collaboration or training and technical assistance. The cooperative management agreement will identify where the NPS could contribute financially to projects and improvements within the general vicinity of the monument.</p>
NPS Participation in Partner Projects and Programs	<p>The NPS will develop a monument map and brochure for use at all partner sites, and each site, including the Gaston Motel, will maintain its own NPS-branded passport stamp to encourage site coordination.</p> <p>The NPS will provide input to partner sites for the further development, marketing, and maintenance of the Heritage Trail.</p> <p>NPS staff will facilitate relationships with larger NPS programs such as the Centennial Challenge, Find Your Park, African American Civil Rights Network activities, and civil rights grants, that support community efforts for neighborhood preservation and revitalization.</p> <p>The NPS will coordinate with partners to evaluate other statewide and national initiatives related to the civil rights story and the role, if any, the national monument can play in these larger efforts.</p> <p>The NPS will participate in information sharing on small business opportunities for contracting at the monument, grant opportunities, and technical assistance available for preservation and restoration of historic resources within the monument and the historic district.</p> <p>The NPS will participate in local and national fundraising initiatives and act as a liaison with national donor and philanthropic organizations (e.g., National Park Foundation or Friends group).</p>
Youth Engagement	<p>The Birmingham Civil Rights Institute (BCRI) Legacy Youth Leader program, NPS interpretation internships, and other partners' youth engagement activities will be coordinated to provide training in interpretation and internships that open a career pathway for youth from the local community.</p> <p>NPS interpretive programming will be coordinated with partners to include youth engagement/activism.</p>
Equity and Inclusion	<p>Equity and inclusion themes will be woven into interpretation and themes throughout the national monument, including involving and engaging in the city of Birmingham, local community businesses, contractors, residents, and partner organizations in future interpretation, concession, and contracting opportunities.</p>

Impact Topic/Element	Alternative 2
Primary Visitor Contact Station, Ticketing, and Fees	<p><u>Primary Visitor Contact Station:</u> The Gaston Motel will serve as the primary visitor contact station and “point of arrival” for the national monument as a whole.</p> <p><u>Ticketing/Fees:</u> There will be no fee charged at the Gaston Motel, and a ticket/reservation for entry will not be required. Ticketing for other sites that require tickets or reservations will occur at the primary visitor contact station and at the individual sites or through specific partner websites.</p> <p><u>Visitor Counts:</u> The NPS will maintain visitor counts at the Gaston Motel following NPS guidelines for such procedures. Individual partner sites will be responsible for their own visitor counts. The NPS will provide guidelines for how to conduct consistent counts between sites.</p>
Visitor Services	<p>The following full information and visitor services will be provided at the primary visitor contact station:</p> <ul style="list-style-type: none"> • Monument map and brochure directing visitors to other monument sites • Tour and program schedule information • Ranger-led and/or self-led tours • Coordinated ticketing, as applicable to sites requiring a fee and/or reservation • Access/wayfinding to other sites (including The Historic Bethel Baptist Church) • Restrooms, drinking fountain, water, weather protection • Gift shop/bookstore <p>Basic information and visitor services will be provided at each partner site including:</p> <ul style="list-style-type: none"> • Monument maps and brochure directing visitors to other monument sites • Restrooms, water, weather protection • Passport stamps • Access/wayfinding to other sites (including The Historic Bethel Baptist Church) <p>Additional information and visitor services could be provided at partner sites to the extent feasible, including site-specific information, merchandise, and refreshments.</p> <p>Food service will be provided at the Gaston Motel in the restored coffee shop.</p>
Visitor Service Concessions	<p>Visitor services that are not provided directly by the NPS or partner organizations will be provided by one or more concessionaires. Concession contracts for food service, tours, parking lots, transportation, and a gift shop or bookstore will be contracted separately by partner sites and coordinated among all partner sites to avoid redundancy and ensure equitable business opportunities.</p>
Security	<p>The NPS would work with partners, including the city of Birmingham to address ongoing safety concerns.</p>

Impact Topic/Element	Alternative 2
Coordinated Interpretive Plan	<p>The NPS will develop a coordinated strategic interpretive plan that outlines how the overall national monument story is told and what part of the story is emphasized at each site. Partner organizations will participate in plan development. The plan will also define an umbrella graphics guide for branding and signage at individual sites and on websites, social media, and other publications and identify roles and responsibilities of each site in providing visitor contact stations and information services, programming, and special events. The interpretive plan will detail the type and scale of public programs to be provided at the Gaston Motel.</p> <p>The NPS will provide cohesive interpretive support and resources for partners organizations and others in the national monument boundary, such as training and technical assistance on interpretation and branding/promotion.</p> <p>The NPS will develop a website and interpretive materials to provide information on key experiences at the national monument, including NPS sites, partner sites, and other associated resources, such as the Heritage Trail. The NPS will assist partner organizations in the further development, marketing, and maintenance of the Heritage Trail. Potential joint marketing efforts will be identified.</p> <p>The NPS will act as a resource to coordinate interpretation between sites, including providing a ticketing mechanism for each site. The NPS will provide resources and training as needed. There will be a combination of ranger-lead, site-led, and self-guided tours throughout the national monument.</p>
Access	<p><u>Parking:</u> Parking for overall national monument visitation will be provided at partner sites, on the street, or in public parking lots in the neighborhood. Parking will continue to be provided at existing partner site lots, as feasible, and coordinated with the city.</p> <p><u>Pedestrian/Bike Trails:</u> Pedestrian and bicycle access throughout the monument will be provided on city sidewalks according to a Universal Design Plan and streetscape guidelines. City of Birmingham pedestrian and bicycle improvements within the monument and environs will occur primarily within the pedestrian priority corridor and will be coordinated with the NPS and other partner sites. Improvements will include bike lanes, wayfinding/graphics, bike parking, and water stations.</p> <p><u>Wayfinding Systems:</u> NPS markers and branding will be located at all sites, and the primary national monument marker will be located at the primary visitor contact station. A map will be provided to visitors.</p> <p>The interpretive plan will integrate the Heritage Trail into the wayfinding signage between monument partner sites.</p> <p><u>Access to Other Sites:</u> Access from the national monument to The Historic Bethel Baptist Church and other civil rights sites outside the boundary will be coordinated through a separate process to evaluate shuttle, trolley, or other transportation options. The NPS will coordinate with the city on existing/planned transportation options.</p>

Impact Topic/Element	Alternative 2
Universal Design	<p>The NPS will develop a universal access plan for the monument to ensure compliance with Architectural Barriers Act Accessibility Standards (ABAAS) throughout the monument and to identify access needs for visitors with vision, hearing, mobility, cognitive, and other impairments. The NPS will provide technical assistance to its partners in meeting these standards.</p> <p>At the Gaston Motel, the ABAAS will be applied to the rehabilitation treatments (see detailed site plan) and to streetscape guidelines developed by the city of Birmingham. The NPS will provide technical assistance to provide equitable and inclusive access to facilities and sites.</p>
Compatible Development	<p>The NPS will support any city of Birmingham-led efforts to develop Character-based Design Guidelines to ensure consistent development within the national monument boundary. Development will follow city ordinances and cultural resource surveys and assessments. Streetscaping will be compatible with the current city plans. The NPS will encourage and provide technical assistance and preservation guidance to the city and other partners regarding the development of controls and design standards related to the form and type of development in areas within the viewsheds of historic structures and landscapes within the national monument boundary.</p>
Preservation of Oral History	<p>The NPS will provide technical assistance and preservation guidance in the development of an oral history collection to be housed at BCRI or Ballard House. This could include engaging community members and family members through stories, song, film, primary source documents, and interviews. The NPS will coordinate with BCRI and other partners external to the national monument, such as Ballard House and the Alabama African American Civil Rights Heritage Sites Consortium, to digitize existing libraries to increase access and equity.</p>
Museum Collection and Storage	<p>The NPS will develop a scope of collections plan for a physical and oral history collection related to the Gaston Motel. The NPS will develop a collection storage strategy for facilities that meet professional standards and offer capacity for future collections for the Gaston Motel. Storage for collections will not be provided at the Gaston Motel.</p> <p>The NPS will provide technical assistance and preservation guidance for physical and oral history collections at partner sites and a collection storage strategy for facilities that meets professional standards and offers capacity for future collections for partner sites.</p>
Program of Uses for the Rehabilitated/Restored NPS-owned Portion of the Gaston Motel	<p>The following rehabilitation/restoration will occur:</p> <p><u>1st Floor</u></p> <p>Orientation</p> <ul style="list-style-type: none"> Restored lobby <p>Information</p> <ul style="list-style-type: none"> Restored check-in desk/office with information desk staff by a ranger; guide office, and former restroom restored for staff use <p>Interpretation</p> <ul style="list-style-type: none"> Restored courtyard, not reconstructing the garage building <p>Visitor Services</p> <ul style="list-style-type: none"> Restrooms First aid

Impact Topic/Element	Alternative 2
	<ul style="list-style-type: none"> • Small bookstore/souvenirs • Elevators <p>NPS Administration</p> <ul style="list-style-type: none"> • Maintenance office/custodial closet • Storage • Rehabilitated guestrooms for administrative offices <p><u>2nd Floor</u></p> <p>Interpretation</p> <ul style="list-style-type: none"> • Restored Master Suite and one guest room • Rehabilitated guestrooms for permanent or changing exhibits • Educational/multi-purpose space
Program of Uses for the Rehabilitated/ Restored City-owned Portion of the Gaston Motel	To be determined by the city of Birmingham.
Courtyard Treatment	The character-defining features of the courtyard will be restored and reconstructed to the 1963 condition, including spatial definition, period furniture, and cars, and will be used to orient/interpret the events of the spring of 1963 that are the basis of the designation of the Gaston Motel and environs as a national monument.
Courtyard Usage	The two-story garage will not be reconstructed. Mobile interpretive panels will be used to restore the spatial definition of the cultural landscape interpretive area to allow the full extent of the 1963–1968 courtyard to be used for events or to provide separation for events and day-to-day functioning of the 1963 cultural landscape.
Services Access	Services access will occur through back-alley access point, and operational details will be worked out between NPS and the city.
Accessibility	A minimum number of doorways will be modified to meet ABAAS accessibility standards. One elevator will be installed to allow access to the second floor. All visitor and NPS administrative spaces will be made fully accessible.

Mitigation

The NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the NPS will implement multiple mitigation measures to protect the natural and cultural resources that the project could affect.

To prevent and minimize environmental impacts related to the selected alternative, the NPS will incorporate best management practices and mitigation measures into design plans and specifications to be implemented during the construction and post-construction phases of the project. These best management practices and mitigation measures will follow the guidance for planning and management decisions for the monument as outlined in the monument’s foundation document. An HSR, completed in 2016, provides recommendations for treatments, including restoration and reconstruction, which were carried forward into

the development and analysis of alternatives. A CLR completed in 2019 acts as a companion report to the HSR and also prescribes treatment recommendations for the monument that will be followed as part of mitigation.

Other Alternatives Considered

The planning team considered alternatives that included the NPS seeking to use more of the city-owned portion of the Gaston Motel for a range of visitor services and monument operations; however, it was determined that the existing NPS-owned portion of the Gaston Motel provided enough of a footprint to adequately meet the purpose and need for overall monument management. The planning team also considered different configurations for using the space on the NPS-owned portion of the Gaston Motel, including putting the main interpretation area on the first floor of the motel. The team agreed that because visitors experience the Master Suite (known as the War Room) on the second floor, offering interpretation on the second floor provided for the optimal visitor flow and visitor experience.

During public scoping, various ideas were presented for how to manage the national monument. These ideas and the reasons for their dismissal from the range of alternatives are described below.

- Commenters provided suggestions for the interpretation of the national monument as a whole and for the Gaston Motel specifically. Suggestions included types of tours, who should lead the tours, and what information should be provided in the interpretation and wayfinding. The NPS will partner with these sites and provide assistance in terms of organization and coordination, and will help to provide consistency on interpretation throughout the monument.
- Commenters suggested alternative locations for the national monument's main visitor contact station. The NPS felt it was appropriate to have the Gaston Motel serve as a main visitor contact station because of NPS ownership of the site, the availability of visitor access and services there, and the motel's central role and location within the national monument boundary.
- Commenters suggested specific management models for the national monument operations, including managing the monument through a 501(c)3 structure. The GMP does not direct the specific type of partnership agreements that the NPS will execute with other partners in the national monument; however, this option could be considered as future planning around specific partnership agreements occurs.
- Commenters requested that the NPS finance specific improvements throughout the monument including cleaning adjacent properties, completing construction projects, and repairing sidewalks. Although the GMP does not state these specific improvements, the NPS is committed to working with the national monument partners.
- Commenters suggested several other sites that should be considered for inclusion in the national monument. The GMP does not propose these specific sites for inclusion in the national monument but instead would rely on future boundary studies to establish guidelines and evaluate sites for inclusion.

Finding of No Significant Impact

The NPS reviewed the environmental impacts described in the EA and determined that no significant direct, indirect, or cumulative impact will occur to any of the park's resources. The NPS considered the following actual or potential project impacts in evaluating the degree of the effects (40 Code of Federal Regulations 1501.3(b)(2)) for the selected action.

As described in the EA, the selected alternative has the potential for adverse and beneficial impacts on park resources, visitor experience, cultural landscapes, historic structures, and socioeconomics. No significant adverse impacts were identified.

VISITOR USE AND EXPERIENCE

The Gaston Motel does not currently offer visitor uses or experiences because it is closed to the public due to inadequate facilities. However, the other related partner sites within the national monument and surrounding area, including the 16th Street Baptist Church, St. Paul United Methodist Church, Kelly Ingram Park, the Masonic Temple, Birmingham Civil Rights Institute (BCRI), and Historic Bethel Baptist Church, offer a range of visitor experiences and access.

Under the selected alternative, the NPS will implement the GMP's desired conditions and management strategies for the national monument and preserve, rehabilitate, and restore the Gaston Motel. This alternative will provide a visitor experience that emphasizes the significance of the motel and the city of Birmingham's association with the civil rights movement and call attention to other historic partner sites related to the purpose and significance of the national monument.

The implementation of the GMP under the selected alternative will generally result in a seamless visitor experience between NPS and partner sites in the national monument, including a coordinated approach to access, branding, services, and interpretation. The Gaston Motel will serve as the primary visitor contact station and will provide full informational and visitor services as outlined in the GMP. The NPS will coordinate with the city of Birmingham on the use of the 1968 side to develop a plan to ensure visitor services can be provided in both the NPS- and city-owned portions of the motel. No fee will be charged at the Gaston Motel, and a ticket/reservation for entry will not be required at this time. Visitors will access the motel and other national monument sites during operating hours through a variety of travel modes, including car, bicycle, and pedestrian means. Parking will continue to be provided at existing partner site lots, as feasible, and the NPS will explore coordination with the city for additional off-site parking. Visitor access from the national monument to The Historic Bethel Baptist Church and other civil rights sites outside the monument boundary will be coordinated with the city to evaluate shuttle, trolley, or other visitor transportation options.

The NPS will develop a universal access plan for the monument to ensure compliance with the Architectural Barriers Act Accessibility Standard (ABAAS) and with city streetscape guidelines and to identify access needs for visitors with vision, hearing, mobility, cognitive, and other impairments. The NPS will provide technical assistance to its partners in meeting these standards to provide equitable and inclusive access to facilities and sites.

Under the selected alternative, visitor amenities at the Gaston Motel will include the rehabilitated and restored historic restaurant and coffee shop. Partner sites will contract separately for other concession contracts for food service, tours, parking lots, transportation, and a gift shop or bookstore; contracts will be coordinated among all partner sites to avoid redundancy and ensure equitable business opportunities.

The implementation of the GMP under the selected alternative will improve the overall visitor experience by providing additional interpretive and educational opportunities. An interpretive plan that details the public programs to be provided at the Gaston Motel will be developed. The 2018 foundation document identifies specific interpretive themes for the national monument. The interpretive plan will incorporate these themes into the structure necessary for monument staff to provide opportunities for visitors to explore and experience. The plan will integrate the Heritage Trail into the wayfinding signage between monument partner sites. The NPS will facilitate cohesive interpretive guidance for partner sites and others in the national monument boundary, including training and technical assistance on their interpretive programs (NPS 2018). In addition, the NPS will develop a website and interpretive materials to provide information on key experiences at the national monument, including NPS sites, partner sites, and other

associated resource. The NPS and its partners will identify clear roles and responsibilities for operations and interpretation through agreements, including guidelines for the extent of NPS involvement in interpretive delivery. The final interpretive and educational themes for the national monument will be consistent with the purpose, significance, and fundamental resources and values of the national monument.

Overall, the selected alternative will provide for a cohesive visitor experience and interpretive plan to help visitors understand the civil rights story in Birmingham during the 1950s and 1960s through the rehabilitation, restoration, and reconstruction of the Gaston Motel as described in the GMP. The selected alternative will improve the visitor experience and most likely attract additional visitors to the national monument and partner sites within the city. For these reasons, the selected alternative will result in direct, long-term, beneficial impacts on visitor use and experience at the national monument and will not have significant adverse short- or long-term impacts.

CULTURAL LANDSCAPES

Changes to cultural landscapes within the national monument will follow the recommendations in the CLR and GMP. Implementation of the GMP will allow for the preservation, rehabilitation, restoration, and reconstruction of the historic fabric and the treatment of cultural landscapes in a manner consistent with the desired conditions and public interpretive goals proposed for the national monument. The treatment recommendations for the cultural landscape at the Gaston Motel will consist of a combination of rehabilitation, restoration, and reconstruction treatments as described in the Secretary of the Interior's *Guidelines for the Treatment of Cultural Landscapes* and *Standards for the Treatment of Historic Properties*.

Under the selected alternative, all proposed development will adhere to the treatments recommended in the CLR and GMP, resulting in direct, long-term, beneficial impacts. Specific recommendations include the following:

- Restoring the building's front facade along 5th Avenue North, the porte-cochere, and parking court to reflect the conditions of the site in 1954, the year that the motel was constructed. Specific elements proposed for reconstruction include the original Z-shaped sign, two planting boxes, and a metal gate at the porte-cochere.
- Reconstructing the original courtyard space and the adjacent area previously occupied by a one-story garage to reflect the landscape setting of the site as it appeared in 1963, a pivotal year in the civil rights movement in Birmingham. The goal of this reconstruction is to return the appearance of the courtyard to May 10, 1963, when Dr. King and the Reverends Abernathy and Shuttlesworth held a news conference in the courtyard of the motel to announce that a truce had been negotiated between city officials and the leaders of the Southern Christian Leadership Conference/Alabama Christian Movement for Human Rights campaigns. Specific elements proposed for reconstruction include the site's original 27-foot x 72-foot courtyard, the brick plaza, metal stairs, covered concrete walkway, metal furniture, curvilinear planting bed, concrete bird bath, vegetation, angled parking and drive lane, parking stop, chain link fence, and the footprint of a former two-story garage and apartment building.
- Rehabilitating the balance of the site, including the eastern section of the parking court and the buildings added to the site in 1968 to enrich the setting with tangible and interpretive elements that continue to tell the story of this site through 1968 and beyond. Specific elements proposed for rehabilitation include the various footprint options for the two-story garage and apartment building, the removal of the 1968 ground-mounted motel sign, and the removal of non-contributing vegetation.

Overall, the selected alternative will provide for a cohesive interpretive plan to help visitors understand the civil rights story in Birmingham during the 1950s and 1960s through the preserved and restored cultural

landscapes that contribute to the national monument's historic setting. Monument-specific preservation strategies and design guidelines developed in coordination with the city of Birmingham will protect the character-defining features of the monument's cultural landscape from incompatible development.

HISTORIC STRUCTURES

Under the selected alternative, all proposed development will adhere to the treatments recommended in the GMP as initially described in the HSR, resulting in direct, long-term, beneficial impacts. The treatment recommendations for the historic structures at the Gaston Motel will consist of a combination of preservation, rehabilitation, restoration, and reconstruction treatments as described in the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. Specific recommendations include the following:

- Preserving the extant exterior and structural portions of the 1954 motel.
- Rehabilitating the exterior of the 1968 buildings to reflect their 1968 conditions. The interior spaces of the rooms in the 1954 motel will be rehabilitated, except for the historically significant Master Suite and other spaces that will be reconstructed. The interior of the 1968 buildings will be rehabilitated because of the substantial loss of historic fabric. These interior spaces will be configured to meet the future programmatic needs and interests of the city of Birmingham and the other partner sites.
- Restoring the extant exterior and structural portions of the 1954 motel to reflect the conditions of the 1963 period of significance, when the property achieved national historic importance for its association with the civil rights movement and the planned actions of Project C. Restoration of the 1954 building will require the removal of non-contributing features, including the ashlar stone planters on the 5th Avenue elevation, aluminum windows, plumbing fixtures, electrical wiring to the main panel, and the existing roofing system and flashing.
- Reconstructing the interior spaces significant to the motel and the civil rights movement, including the Master Suite, lobby, coffee shop, restaurant, and at least one additional guest room, as well as the damaged and missing 5th Avenue elevations of the coffee shop and restaurant.

In addition to the treatments proposed for the Gaston Motel, the implementation of the GMP will result in the following long-term benefits for the national monument and its interpretive goals:

- Preservation of the historic character of the neighborhood within the boundary of the national monument, to the extent practicable.
- Expansion of the national monument boundary to include The Historic Bethel Baptist Church, Parsonage, and Guard House.
- Protection and management of both NPS and partner museum collections per industry standards.
- A program to preserve and appropriately interpret the contributions of individuals associated with the history of the national monument through oral histories and written historical narratives.
- A process for ensuring appropriate development within the boundary of the national monument that includes the development of a consistent set of design standards that preserves the historic character of the area.
- Services that provide technical expertise and preservation guidance in the preparation of baseline cultural resource documentation for key resources at the monument, such as HSRs and CLRs.

Overall, the implementation of the proposed treatments for historic structures, combined with the expansion of the monument boundary to include The Historic Bethel Baptist Church, the preservation of the monument's historic setting through compatible development, a plan to manage and protect museum

collections, and a program to document the contributions of individuals important in the Birmingham civil rights movement as described above, will provide for a cohesive interpretive experience for visitors to the national monument, thereby resulting in direct, long-term benefits; no short- or long-term, significant, adverse impacts will occur.

SOCIOECONOMICS

Under the selected alternative, NPS will implement the GMP for the national monument, including its conditions and management strategies. Recent studies have examined the economic impact of national monument designation. Opponents frequently argue that monuments have a detrimental effect on local economies by restricting access to public lands. Recent studies, however, demonstrate that national monument designation can benefit local economies, particularly by increasing tourism and recreational spending (Walls et al. 2020; Rasker et al. 2013). According to the Walls et al. 2020 study, monument designation resulted in a 10% increase in new businesses and an 8.5% increase in jobs in the zip codes adjacent to 14 national monuments. The hotel, business services, health services, construction, finance, investments, and real estate sectors all saw job growth. Additionally, the study discovered that monument designations may help new businesses thrive.

National park system units welcomed more than 237 million visitors in 2020, with visitors spending nearly \$14.5 billion in local gateway regions. Additionally, park units benefited the national economy by creating 23,000 jobs, earning \$9.7 billion in labor income, adding \$16.7 billion in value added, and generating \$28.6 billion in economic output. The lodging industry benefited the most directly, with \$5 billion in economic output directly benefiting this sector on a national scale, followed by the restaurant industry, with \$3 billion in economic output (NPS 2021). Also, in 2020, 1.3 million visitors visited national parks in Alabama during the same period, contributing an estimated \$61.7 million to the state's local gateway regions, supporting 940 jobs, \$24.8 million in labor income, \$42.6 million in value added, and \$78.2 million in economic output (NPS 2021).

Under this alternative, it is reasonable to believe that visitation to the monument will increase as a result of enhanced visitor experiences at a restored, accessible Gaston Motel and increased local and regional partnership opportunities. The subsequent increase in visits could be a catalyst for local job creation. Additionally, visitor spending will grow beyond the current levels, resulting in long-term, beneficial impacts on the local economy and, to some extent, neighboring counties. No short- or long-term, significant, adverse impacts will occur.

Consultation and Coordination

PUBLIC PARTICIPATION

Civic engagement and scoping are essential components of the NEPA planning process. The NPS conducted public scoping and civic engagement to inform various agencies, community partners, and the public about the need to develop a comprehensive GMP at the national monument. Public scoping included a project scoping newsletter that provided an overview of the project, described the planning process and the path forward, and included the 30-day public scoping period notice. The NPS solicited feedback on a series of questions included in the newsletter to assist with planning for the monument's future and identifying preferred interpretive and educational experiences. The initial public comment period on the GMP ran from June 7, 2021, to July 10, 2021, and included opportunities to be involved in the planning process for the monument and to submit written comments. The NPS held two virtual meetings on June 16, 2021, from 1:00 p.m. to 3:00 p.m. (Central Time), and on June 17, 2021, from 6:30 p.m. to 8:30 p.m. (Central Time) to provide the public with the opportunity to learn more and ask questions about the GMP. Seven correspondences were received during the public review process for the

Birmingham Civil Rights National Park Environmental Assessment. In general, commenters supported the proposed improvements, including the NPS preferred alternative. Several commenters also supported designating the Gaston Motel as the primary physical resource within the monument. Summaries of substantive public comments are provided below.

- One commenter highlighted neighboring properties that may contribute to a negative visitor experience through general nuisances such as noise.
- Two commenters expressed concern regarding the number of parking spaces available for an increased number of monument visitors in the area. Bike accessible pathways and bike racks near the monument were also discussed as an important method of accessibility to the monument and as a hindrance to the historic aesthetic of the area.
- One commenter expressed concern over the GMP's focus on the management of the Gaston Motel and suggested that the motel plan include more concise direction for the café and other monuments within the national monument boundary.
- One commenter suggested including Bethel Baptist Church within the official boundary of the national monument. Ranger-led tours of Bethel Baptist Church were suggested as means of tracking visitation to the site.
- One commenter requested that NPS clarify the difference between reconstruction and rehabilitation with regard to the Preservation and Conservation Easement Deed.
- The visual experience of the motel was also discussed by one commenter, suggesting that care be taken to ensure that visitor entry and crowding do not take away from the historical significance of the lobby and other significant locations. Commenters also mentioned the historical accuracy of motel furnishings, café menu, and utilities.
- One commenter suggested notable visitors to the hotel be honored in the second-floor rooms they stayed in.
- One commenter suggested an Oral History Archive Facility be included in the scope of the project for the purpose of collecting items related to the history of the monument and for the long-term protection of the items.
- One commenter requested a map of the Heritage Trail, sections of the monument's foundation document, and local Historic District Ordinances be included as appendixes in the GMP.

INVOLVEMENT OF NATIONAL MONUMENT PARTNERS

At the beginning of the planning process, the NPS conducted a series of interviews with national monument partners to better understand how each site is currently visited, plans for future interpretation visitation, and how partners could best benefit from the NPS's involvement in the overall monument. In March and April 2020, interviews were conducted with:

- Urban Impact – March 31, 2020
- Historic Bethel Baptist Church – April 1, 2020
- City of Birmingham – April 2, 2020
- 16th Street Baptist Church – April 2, 2020
- BCRI – April 3, 2020
- St. Paul United Methodist Church – April 3, 2020

Partners were also invited to the public meetings during the civic engagement process. Additional meetings were held with the city of Birmingham throughout the planning process including monthly coordination meetings.

AGENCY AND TRIBAL CONSULTATION

The National Historic Preservation Act section 106 consultation process related to the A.G. Gaston Motel, Birmingham Civil Rights Historic District, was initiated with the Alabama State Historic Preservation Office (SHPO) on August 31, 2018. The SHPO reviewed the HSR and the report's Phase 1 design drawings in 2018. Consultation efforts with the Alabama Historical Commission to date are summarized below.

- On August 31, 2018, the NPS initiated formal consultation with the SHPO under section 106 of the National Historic Preservation Act, as amended. The NPS transmitted the HSR and draft design development drawings prepared by Lord Aeck Sargent for the A.G. Gaston Motel to the Alabama Historical Commission for review and comment. The HSR and design drawings were prepared in accordance with the preservation, rehabilitation, restoration, and reconstruction treatment standards outlined in the Secretary of the Interior's *Standards for the Treatment of Historic Properties*.
- On September 10, 2018, the Alabama Historical Commission provided formal comments on the design drawings for the Gaston Motel exterior restoration to the NPS in a letter addressed to Reginald Peoples, Acting Superintendent of the national monument at the time consultation occurred.
- On November 15, 2018, the NPS sent a letter to the Alabama Historical Commission requesting review and comment on the 100% design drawings, which the Commission required for the purposes of assessing effects on the property under section 106 of the National Historic Preservation Act.
- On February 5, 2019, the NPS sent a letter to the Alabama Historical Commission to inform the SHPO that the NPS had determined that implementation of Phase 1 of the undertaking will have no adverse effect on the Gaston Motel. The letter also included a matrix that addressed the SHPO's comments on the previously submitted design drawings for the motel.
- On February 21, 2019, the Alabama Historical Commission provided formal comments to the NPS in a letter addressed to Reginald Peoples, Acting Superintendent of the national monument. The letter acknowledged the NPS's responses to the SHPO's comments on the Phase 1 design drawings for the Gaston Motel. Additionally, the letter indicated that the SHPO agreed with the NPS finding that the Phase 1 exterior repairs and restoration work will have no adverse effect on the Gaston Motel.

The NPS will continue consultation under section 106 associated with future design phases for the work on the Gaston Motel. In addition, the GMP provides management strategies for ensuring consistent development within the boundary of the national monument, guidance for the preservation of museum collections, and the development of an oral history collection. Some of the details associated with the desired conditions envisioned for the national monument, as well as the management strategies developed to achieve those conditions, require additional collaboration among the monument partners before the GMP can be finalized. The NPS will continue to consult with the SHPO as the project advances over the next several years.

Conclusion

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement. The selected alternative will not have a significant effect on the human environment in accordance with section 102(2)(c) of NEPA. Based on the foregoing, it has been determined that an environmental impact statement is not required for this project and, thus, will not be prepared.

References

Lord Aeck Sargent

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APPENDIX A

Finding of Non-Impairment

Environmental Assessment for General Management Plan

**US Department of the Interior
National Park Service
Birmingham Civil Rights National Monument
Alabama**

NON-IMPAIRMENT DETERMINATION FOR THE BIRMINGHAM CIVIL RIGHTS NATIONAL MONUMENT

The Prohibition on Impairment of Park Resources and Values

National Park Service (NPS) *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given NPS the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the NPS 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 NPS. 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.

WHAT IS IMPAIRMENT?

NPS *Management Policies 2006*, section 1.4.5, What Constitutes Impairment of Park Resources and Values, and section 1.4.6, What Constitutes Park Resources and Values, provide an explanation of impairment.

Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

Section 1.4.5 of NPS *Management Policies 2006* states:

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would 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;
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an 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.

Per section 1.4.6 of NPS *Management Policies 2006*, park resources and values that may be impaired include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural

landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;

- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act unless the NPS was in some way responsible for the action.

HOW IS AN IMPAIRMENT DETERMINATION MADE?

Section 1.4.7 of *NPS Management Policies 2006*, states:

[I]n making a determination of whether there would be an impairment, an NPS decision maker must use his or her professional judgment.

This means that the decision maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969; consultations required under section 106 of the National Historic Preservation Act; relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.

NPS Management Policies 2006, further define “professional judgment” as:

... a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities in relation to the decision.

Non-Impairment Determination for the Selected Alternative

This determination on impairment has been prepared for the selected alternative described starting on page 7 of the EA. A non-impairment determination is made for all resource impact topics analyzed in detail for the selected alternative except for visitor use and experience because impairment findings relate back to park resources and values. Visitor use and experience is not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

ARCHEOLOGICAL RESOURCES

The proposed action will not have any foreseeable impacts on archeological resources, and thus archeological resources were dismissed from further analysis. If restoration and rehabilitation plans for the national monument proceed, the NPS will review the plans to assess possible impacts on archeological resources. If improvements require excavations that could affect potential archeological resources, the NPS

will continue section 106 consultation with the state historic preservation office and other partnering sites through the standard review process. No long-term impacts are expected to any archeological resource. Therefore, the selected alternative will not result in the impairment of archeological resources.

CULTURAL RESOURCES

Changes to cultural landscapes within the national monument will follow the recommendations in the General Management Plan (GMP) and related Historic Structure Report (HSR) and Cultural Landscape Report (CLR) for the Gaston Motel. Implementation of the GMP will allow for the preservation, rehabilitation, restoration, and reconstruction of the historic fabric and the treatment of cultural landscapes in a manner consistent with the desired conditions and public interpretive goals proposed for the national monument. The treatment recommendations for the cultural landscape at the Gaston Motel will consist of a combination of rehabilitation, restoration, and reconstruction treatments as described in the CLR and the Secretary of the Interior's *Guidelines for the Treatment of Cultural Landscapes* and *Standards for the Treatment of Historic Properties*. Therefore, no impairment of cultural resources will occur under the selected alternative.

HISTORIC STRUCTURES

Changes to historic structures within the national monument will follow the recommendations in the HSR and GMP, which will allow for the preservation, rehabilitation, restoration, and reconstruction of the historic fabric and the continued use of historic structures in a manner consistent with the desired conditions and public interpretive goals proposed for the national monument. The recommendations in the GMP will adhere to the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, *Guidelines for the Treatment of Cultural Landscapes*; Director's Order 28: *Cultural Resources Management Guidelines* (NPS 1998); and all applicable local, state, and federal codes, regulations, and policies. Changes to historic structures that adhere to the Secretary of the Interior's treatment standards will avoid adverse impacts on historic structures and result in direct, long-term, beneficial impacts. Because historic structures will be rehabilitated, preserved, restored, and reconstructed and no adverse impacts are expected to occur, the selected alternative will not result in the impairment of historic structures.

Conclusion

The NPS has determined that implementation of the selected alternative will not constitute an impairment of the resources or values of the park. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the environmental assessment, comments provided by consulting agencies and the general public, and the professional judgment of the decision maker guided by the direction of the *NPS Management Policies 2006*.

Errata

Environmental Assessment for General Management Plan Birmingham Civil Rights National Monument, Alabama

February 2023

ERRATA

An errata sheet is necessary to clarify information presented in the *Environmental Assessment for General Management Plan, Birmingham Civil Rights National Monument, Alabama* (EA). The clarifications made herein do not increase the degree of impacts described in the EA or change the determination that no significant impacts will occur under the selected alternative. Existing text to remain in the EA is found in *italics*, additions to the text are underlined, and deleted text is shown in ~~strikeout~~.

Page 5, Relationship to Other Planning Efforts, Historic Structure Report

The treatment and use of the Gaston Motel would follow the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary of the Interior's standards). The standards are a set of advisory principles that promote best practices in maintaining, repairing, or replacing historic materials, as well as designing new additions or alterations.

Four distinct treatment approaches are defined in the Secretary of the Interior's standards. These approaches can be applied to a wide variety of cultural resource types, including buildings and other structures, districts, and landscapes:

- Preservation maintains the existing integrity and character of a historic resource. This treatment precludes uses that would require major additions or demolition.
- Rehabilitation maintains the existing integrity and character of a historic structure but allows major additions or alterations to accommodate a compatible contemporary use.
- Restoration reestablishes the form, features, and character of a historic resource at a specific past period of time.
- Reconstruction produces a new resource identical in form, features, and details to a historic resource that no longer exists. NPS Management Policies 2006 permits reconstruction only if (a) it is essential for public understanding of the cultural associations of a park established for that purpose, and (b) the resource can be built at full scale on the original site with minimal conjecture. NPS rarely reconstructs historic resources (NPS 2021b).

Recommendations for treatment of the Gaston Motel, including rehabilitation, restoration, and reconstruction, provided in the HSR and carried forward for analysis in this document include:

- *Preserving and restoring the extant exterior and structural portions of the 1954 motel.*
- *Reconstructing the interior spaces significant to the motel and the civil rights movement, including the Master Suite, lobby, coffee shop, restaurant, and at least one additional guest room.*
- *Reconstructing the damaged and missing 5th Avenue elevations of the coffee shop and restaurant.*
- *Rehabilitating all portions of the 1968 buildings and the interior spaces of the 1954 motel's rooms, excluding the historically significant Master Suite and other spaces that will be reconstructed (Lord Aeck Sargent 2016).*

Page 11, Table 1: Alternatives Comparison – Community Partner Engagement, Boundary Adjustment

NPS would seek to expand the boundary of the national monument to include The Historic Bethel Baptist Church site. A separate congressional or presidential action would be required to expand the

monument boundary to include The Historic Bethel Baptist Church site. While this boundary adjustment is recommended as part of this document, this recommendation cannot be executed without an associated designation action. A framework for identifying what additional sites, if any, should be included in the monument boundary would be determined at a later date. A rationale for the inclusion of the church in the monument boundary is included in the GMP (in the “Proposed Boundary Adjustment” section).

Page 45, Alternative 2 – NPS Preferred Alternative

In addition to the treatments proposed for the Gaston Motel, the implementation of the GMP would result in the following long-term benefits for the national monument and its interpretive goals:

- *Preservation of the historic character of the neighborhood within the boundary of the national monument, to the extent practicable.*
- *Expansion of the national monument boundary to include The Historic Bethel Baptist Church, Parsonage, and Guard House. (Note: Separate legislative or presidential action would be required to expand the monument boundary to include The Historic Bethel Baptist Church site.)*

Page 46, Alternative 2 – NPS Preferred Alternative

Overall, the implementation of the proposed treatments for historic structures, combined with ~~the expansion of the monument boundary to include The Historic Bethel Baptist Church, the~~ preservation of the monument’s historic setting through compatible development, a plan to manage and protect museum collections, and a program to document the contributions of individuals important in the Birmingham civil rights movement as described above, would provide for a cohesive interpretive experience for visitors to the national monument, thereby resulting in direct, long-term benefits. Expansion of the monument boundary to include The Historic Bethel Baptist Church site through separate legislative or presidential action would contribute to these long-term benefits.

Page 18, Table 1: Alternatives Comparison – A.G. Gaston Motel Specific Elements, Program of Uses for the Rehabilitated/Restored NPS-owned Portion of the Gaston Motel

The following rehabilitation/restoration would occur:

1st Floor

Orientation

- *Restored Lobby. NPS intends to restore the lobby to look and feel as it did in 1963. Primary NPS orientation, interpretation, and visitor services on the first floor would be located at the back of the motel.*

Information

- *Restored Check-in Desk/office with information desk staffed by a ranger; guide office, and former restroom restored for staff use.*

Page 56, References, National Park Service (NPS)

2021b Secretary of the Interior’s Standards for the Treatment of Historic Properties (webpage). Available

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