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

**Roosevelt-Vanderbilt National Historic Sites
Hyde Park, New York**

- **Home of Franklin D. Roosevelt National Historic Site**
 - **Eleanor Roosevelt National Historic Site**
 - **Vanderbilt Mansion National Historic Site**
-

General Management Plan and Environmental Impact Statement

Record of Decision

Approved:



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Date: 9/20/10

Recommended:



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Date: 9.15.10

UNITED STATES DEPARTMENT OF THE INTERIOR

NATIONAL PARK SERVICE

RECORD OF DECISION

GENERAL MANAGEMENT PLAN

ENVIRONMENTAL IMPACT STATEMENT

Roosevelt-Vanderbilt National Historic Sites

New York

The United States Department of the Interior, National Park Service, has prepared this Record of Decision for the *General Management Plan/Final Environmental Statement* for Roosevelt-Vanderbilt National Historic Sites. This Record of Decision (ROD) includes: the project background; a statement of the decision made; a description of the alternative selected for implementation; a listing of measures to minimize and/or mitigate environmental harm; a synopsis of other alternatives considered; the basis for the decision; findings on impairment of park resources and values; a description of the environmentally preferred alternative; and a summary of public and agency involvement in the decision-making process.

PROJECT BACKGROUND

The primary function of a general management plan is to clearly define a park's purpose and management direction over the long term, typically 15 to 20 years into the future. The plan describes the resource conditions and visitor experiences that are to be achieved and maintained. The clarification of what must be achieved according to law and policy is based on a review of the park's purpose, significance, and mission. A general management plan is a policy-level document that provides a framework for more detailed implementation and technical plans. The National Park Service seeks to have all parks operate under approved general management plans to ensure that park managers carry out as effectively and efficiently as possible the mission of the National Park Service:

The National Park Service preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. The service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

The *General Management Plan* for Roosevelt-Vanderbilt National Historic Sites provides guidance for the three national historic sites in Hyde Park, New York: Home of Franklin D. Roosevelt National

Historic Site; Eleanor Roosevelt National Historic Site (also known as Val-Kill); and Vanderbilt Mansion National Historic Site. The plan was created over several years under the guidance of an interdisciplinary planning team including the Superintendent, senior park staff, NPS regional office staff, and consultants. During this process, the planning team involved the public, gathered background information, examined park legislation, compared similar sites, consulted with other agencies, partners and resource experts, explored solutions, assessed impacts, and published draft and final plans. At the outset, the planning team recognized that, although a general management plan was needed for each of the three Roosevelt-Vanderbilt National Historic Sites, a single unifying plan was not only the most expeditious approach, but was also essential for continued coordinated management.

With public and stakeholder involvement, the planning team developed statements of park purpose and significance, outlined interpretive themes, analyzed fundamental resources and values, identified planning issues, and formed goals for the national historic sites. Based on this foundation, the planning team defined and applied three broad questions, or “decision points” around which the alternatives were structured:

- 1) *What level and extent of resource treatment is most desirable and appropriate to portray the historic conditions and facilitate long-term stewardship?*
- 2) *How can the parks best maintain or build visitation and interpret the historic sites to new generations?*
- 3) *How can the parks best work with partners to garner resources and enhance capacity for operations?*

The planning team developed two “action alternatives” that were evaluated in the Draft and Final EIS, along with the “no-action” alternative. The planning team also developed a set of management objectives that would be pursued under any alternative.

DECISION (SELECTED ACTION)

The National Park Service (NPS) will implement the agency’s preferred alternative, Action Alternative Two, including the elements common to all alternatives, as described and analyzed in the *Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS)*.

Description of the Selected Action

The alternative selected for implementation, Action Alternative Two, seeks to make the parks relevant to more audiences by encouraging greater civic participation in park activities, while significantly enhancing the historic character of park resources. These efforts are in keeping with the historic residents’ use of the land for outdoor enjoyment and resource stewardship. Resource management efforts will focus on the landscape and be aimed at rehabilitating existing features, but will follow contemporary best practices for land management within select areas. Resource management decisions will be guided to a greater extent by programmatic needs, especially interpretation. The reconstruction of missing landscape features will be limited; generally they will

be represented by new features of similar massing and scale, or through interpretive media. Construction of new trail segments to support visitor access will be allowed. The main historic residences—FDR Home, Val-Kill Cottage, and Vanderbilt Mansion—will continue to be presented as fully furnished historic house museums, with select historic outbuildings adaptively re-used for park or partner programs.

Efforts to build and maintain visitation will focus on providing a wide range of activities, including recreational activities, special events, and programs to reach varied audiences. While interpretation will be place-based, it will more deliberately use resources to explore issues of contemporary relevance. A learning center will be established to expand the scope and magnitude of the educational programs. Creation and presentation of these new programs will depend largely on partners, with some NPS employees functioning more as coordinators and facilitators than at present.

The selected alternative calls for a significant expansion of partnership activities in the operation of the sites and opens up greater potential for new approaches to generating revenue to help sustain and improve operations.

Key Components

Rehabilitates cultural resources to enhance the historic character of estates and continues historic land uses with allowances for contemporary practices:

- Forests will be actively managed; treatments will range from managing for historic character to using latest forestry practices
- Historic fields will be reclaimed and farming reintroduced as feasible, with contemporary practices allowed
- Designed landscapes will be rehabilitated and missing features indicated via media or elements of similar massing/scale, for example, a community “Victory Garden” could be developed on the FDR Home Garden site
- The Hudson River view will be expanded at the Home of FDR, with action taken to preserve the view at Vanderbilt

With partners, a wider choice of visitor experiences will be offered to reach more audiences:

- Forestry and farming demonstrations and special events will be developed
- A place-based learning center, serving preschoolers to retirees, will be established
- Changing exhibits/forums that explore the contemporary relevance of site stories will be pursued
- Compatible recreational use of trails will be promoted with multi-use trail links among the sites
- River connections will be improved at Roosevelt Cove and Bard Rock

Significantly increased partner participation will help maintain resources, run programs, and generate revenue:

- Partners will be sought for a compatible public use of the Vanderbilt Coach House to offset maintenance costs
- Partnerships will be developed to operate the learning center and conduct demonstrations, special programs, and recreation-based tours
- New sources of revenue will be evaluated and implemented with partner participation, such as the development and sale of branded products

The following objectives, which were common to all alternatives evaluated in the *Draft GMP/EIS*, are incorporated into the selected alternative:

- Continue to make preservation and maintenance of park resources a management priority
- Strive to preserve the collections in good condition to support programs and interpretive themes, and acquire original and associated collections when available
- Preserve and enhance, when possible, important natural communities, such as freshwater tidal marsh, and mature forest stands
- Relocate maintenance facilities from historic buildings to a new structure
- Retain the Bellefield property as park headquarters but update it for efficiency
- Take steps to achieve energy efficiency, establish sustainable practices, and promote car-free access to the parks
- Continue to work with partners to promote stewardship and work to protect the sweeping views of the Hudson Valley, the parks' historic setting, and re-establish the rural character of the Route 9 and Route 9G corridors to the extent practicable

Mitigating Measures/Monitoring

During the preparation of the plan, the planning team identified measures to minimize and/or mitigate negative impacts of the management objectives and potential actions. The mitigation measures to be implemented as part of the selected alternative are described below. Due to the programmatic nature of the plan, additional mitigation strategies may be required as specific actions are proposed under the selected alternative and will be identified as part of planning for these future actions in compliance with the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA), and other applicable laws and policies prior to implementation.

Cultural Resources

Park managers will undertake several development projects to implement the selected alternative. Included among them are: upgrading the Bellefield property; continuing to make basic repairs and replacements to utility infrastructure; selecting a site and developing a maintenance facility; rehabilitating historic views, farm fields, and designed landscapes, and managing forest plantations and natural woodlands; and extending the trail system. Archeological reviews, surveying, careful planning, consultation, and monitoring will be employed to mitigate impacts to archeological resources associated with these activities. Existing archeological studies will serve as guiding documents indicating known and potential archeologically sensitive areas. Depending upon the

location of the projects, new research may be needed to evaluate the known and potential archeological resources. Archeological sites will be avoided as possible and archeological resource data collected prior to construction. During construction, archeological monitoring will ensure that proper procedures are followed for minimal disturbance, such as appropriate construction staging areas. If any unknown significant resources are uncovered during ground-disturbing activity, procedures in compliance with Section 106 of the NHPA will be initiated.

Park managers will repair, rehabilitate, and adaptively re-use certain historic buildings to implement the selected alternative. Appropriate planning will be undertaken to mitigate and minimize potential loss of historic fabric associated with modifications to the historic interiors. All work will follow the *Secretary of the Interior's Standards* and NPS management policies. Treatment plans developed in consultation with the New York State Historic Preservation Officer (NYS SHPO) will ensure good decision making regarding the preservation of remaining features and the rehabilitation of others.

Natural Resources

As described above, park managers will undertake several development projects to implement the selected alternative. Included among them are: selecting a site and developing a maintenance facility; rehabilitating historic views, farm fields, and designed landscapes, and managing forest plantations and natural woodlands; and extending the trail system. A site for the maintenance facility will be chosen, in part, to have minimal effect on natural resources, for example to minimize impacts on wetlands, floodplain, threatened and endangered species, soils and topography. Best practices, such as restricting construction activity to the smallest area possible, using existing alignments, and minimizing grade changes, will mitigate potential impacts to natural resources. Mitigation measures will be taken to control soil loss and erosion, to protect vernal pools, seeps, and wetlands, and to control invasive species potentially introduced by the clearing of understory, removal of trees, and other actions that would result in a loss of habitat for certain species. When rehabilitating designed landscapes, mitigation measures, such as using plants that are less attractive to wildlife and installing fencing, will minimize potential impacts associated with introducing new food sources to opportunistic wildlife.

Park managers will introduce more diverse and innovative programs and actively promote recreational use of the park trails. Clear signage and formalized pathways and trails will be used to mitigate potential impacts associated with trampling of vegetation, spread of invasive species, and disturbance and dispersal of wildlife.

OTHER ALTERNATIVES CONSIDERED

No-Action Alternative (Continuation of Current Practices)

The No-Action Alternative represents a continuation of current management practices at the Roosevelt-Vanderbilt National Historic Sites. It allows projects to be completed for which funding has been secured or environmental compliance has been fulfilled, but does not allow for major changes in direction.

Under the No-Action Alternative, park managers would continue to work to improve the condition of the cultural resources within available funding. The configuration and management of the cultural landscape would remain largely as is. Existing views of the Hudson River would be maintained by the present, though this means they will become increasingly obstructed by tree growth. Forest plantations would be inventoried and subject to continued research, but no management actions would be taken to keep them from being lost to natural succession. No additional management of natural woodlands would be undertaken. Existing gardens, orchards, and other designed landscapes would appear largely as they do now, with no efforts made to restore, replace, or interpret missing features. No attempt would be made to reclaim former farm fields now obscured by tree growth.

Interpretation would continue to be centered on guided tours of the historic residences, with little emphasis placed on other estate buildings and cultural landscapes. Outdoor and recreation-based interpretive programs would continue to receive little emphasis. Educational programs would continue to function at current capacity, with the overwhelming majority of programs offered at the Home of FDR and with house tours serving as the core of the programming. Occasional outreach programs would continue.

Existing partnerships would be maintained and volunteer programs would continue, with support provided for special projects on an occasional basis. Coordination of educational and interpretive programming with partners would continue on a limited basis.

Action Alternative One

Action Alternative One perpetuates the general philosophy and direction of the existing management plans but updates them to address changed conditions, additions to the parks, and increased knowledge of park resources gathered in the intervening years. Proposed resource management efforts would focus on the landscape and be aimed at restoring the historic appearance of resources to the fullest extent possible within select areas. The reconstruction of landscape features lost since the historic period would be encouraged in core areas to complete the historic scene. Modern intrusions would be minimized, and this alternative would limit the addition of features or facilities that were not present during the periods of historic significance. The main residences would continue to be presented as historic house museums, with more historic outbuildings opened for interpretation than at present.

Efforts to maintain and build visitation would center on expanding the tour options available to visitors and strengthening educational programming. Interpretation would focus on describing historic conditions and encouraging visitors to explore not only the historic residences, but the entirety of the estates through a range of guided and self-guided tours. Educational programming would be strengthened and concentrate on curriculum-based, after-school, and other types of children's programs.

This alternative would rely on enhanced partnerships to accomplish its vision. Coordination with partners would focus on increasing access to and awareness of the sites, enhancing interpretive programming, and assisting with resource preservation efforts.

BASIS FOR DECISION

The following section documents the rationale for the decision to select Action Alternative Two for implementation. In arriving at this decision, the planning team evaluated how well each of the alternatives met the parks' goals and compared the potential environmental impacts of the alternatives on cultural and natural resources, the visitor experience, park operations, and the socioeconomic environment. Based on this evaluation, the NPS determined that Action Alternative Two conveys the greatest number of beneficial results in comparison with the other alternatives. A summary of the rationale for selection is provided below. The narrative is presented in three categories that correspond to overarching goals of the NPS: 1) to preserve park resources; 2) to provide for visitor use and enjoyment, and 3) to ensure organizational effectiveness. (See Part Four of the *Draft GMP/EIS* for a full description of the environmental impact analysis.)

The NPS determined that the selected action best fulfills the goals outlined for the parks. In regard to preserving park resources, the NPS concluded that Action Alternative Two presents an approach to landscape management that is more practical and sustainable over the long term, and thus more likely to succeed in preserving resources than the other two alternatives. In terms of providing for public use, Action Alternative Two offers a wider variety of visitor experiences and places greater emphasis on the relevance of park themes to contemporary concerns, and thus may more effectively communicate park themes to a greater diversity of audiences than the other alternatives. In regard to ensuring operational effectiveness, Action Alternative Two opens up more opportunities for partner involvement in park operations, and may therefore better motivate new park stewards to advocate for the long-term preservation of the parks and related resources, and may offer the greatest potential to reduce the operational burden on park staff. These themes are also reflected in the comparison of environmental impacts outlined below.

The NPS determined that, based on a comparison of environmental impacts, the selected action conveys the greatest number of beneficial results than the other alternatives. The selected alternative would have an overall positive impact on cultural resources. Rehabilitating cultural landscapes and re-establishing forestry and farming practices will bring the cultural landscapes closer to historic conditions and will do so in ways that are more cost-effective to maintain. By allowing greater flexibility in resource treatment and relying more on perpetuating historic land uses, as opposed to strictly seeking to re-establish historic appearance, Action Alternative Two presents an approach to landscape management that is more practical, cost-effective, and sustainable over the long term. Repair, rehabilitation, and adaptive re-use of certain historic structures will reduce the deferred maintenance backlog on those structures. Actively managing some of the forest plantations and natural woodlands in accordance with modern practices will result in more diverse and healthier systems. Introducing more diverse programs, enhancing educational programming, and increasing emphasis on the contemporary relevance of the parks' stories will appeal to new audiences and broaden the base of support for cultural and natural resource stewardship. Augmenting the staff with volunteer docents and extensive partner support will allow more labor and funding from new sources to be put toward cultural and natural resource stewardship.

The selected alternative will have an overall positive impact on visitor use and experience. By encouraging more diverse interpretation, Action Alternative Two is the most likely to halt or even reverse the long-term decline in visitation. Introducing more diverse programs, enhancing educational programming, and increasing emphasis on the contemporary relevance of the parks' stories will provide a fuller depiction of important themes, offer a more engaging and participatory experience, and allow a greater diversity of ways to experience and learn about the parks. Making the parks more lively places, promoting compatible recreational use, and interpreting the parks to demonstrate their relevance to contemporary concerns should increase their qualitative benefits. Similarly, the greater scope of education under Action Alternative Two may more effectively renew interest in the parks and motivate new park stewards. Rehabilitating cultural landscapes, re-establishing forestry and farming practices, and repairing, rehabilitating, and adaptively re-using historic structures will increase visitors' understanding of the historic condition and functions of the properties. Presenting themes in a contemporary context will offer more opportunities for public participation and understanding of the parks' resources. The emphasis on partnerships and innovative programs should increase community involvement in the parks, which will support both preservation and a compatible diversity of uses. Action Alternative Two echoes to a greater degree than the other alternatives, the Roosevelts' ideals of active participation in government and civic life.

The selected alternative will have an overall positive impact on the parks' operational effectiveness. The emphasis on partnerships and new sources of revenue in Action Alternative Two will free park employees and funding to focus on management to a greater degree than the other alternatives. The integration of partners in many levels will facilitate resource stewardship. For example, re-establishment of forestry and farming practices and adaptive re-use of historic structures through leases, cooperative agreements, or other mechanisms will reduce the operational burden on park staff and ultimately contribute to the long-term stewardship of park resources. Working with partners will establish long-term relationships that will enable the park to provide substantially more services without commensurate increases in NPS staff. Staff time, however, will be required for increased partner coordination and administration, and promoting recreational use of the trails will increase the maintenance and law enforcement workload. Seeking new sources and augmenting existing sources of revenue will increase the capacity to maintain resources and operate the park. Increased partner-based activities will increase maintenance responsibilities in the short-term, though it is expected that the costs associated with these increases would be covered by the gains in revenue generated over the long term.

FINDINGS ON IMPAIRMENT OF PARK RESOURCES AND VALUES

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of Interior and the NPS to manage units "to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations" (16 USC § 1). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no "derogation of the values and

purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress" (16 USC 1a-1).

The NPS has determined that the selected alternative will not result in impairment of any park resources or values. A final determination on impairment for the selected alternative is attached to this Record of Decision.

CONSISTENCY WITH NEPA SECTION 101(B) AND THE ENVIRONMENTALLY PREFERRED ALTERNATIVE

The Environmentally Preferred Alternative is defined by the Council on Environmental Quality (CEQ) as "the alternative that will promote the national environmental policy as expressed in the National Environmental Policy Act [Section 101(b)]." CEQ further clarified the identification of the Environmentally Preferred Alternative in their *NEPA's 40 Most-Asked Questions* as "the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources (Q6a)." Following is the analysis of how well each of the alternatives evaluated in the Draft/Final Plan/EIS meet each of the NEPA Section 101(b) criteria, followed by the identification of the Environmentally Preferred Alternative according to CEQ's Q6a definition.

The goal of the NPS is to serve as a trustee for the environment for future generations (Criterion #1). This fundamental requirement to preserve significant resources is contained in the agency's 1916 Organic Act. The No-Action Alternative would seek to maintain resources at a basic level and thereby fulfill the NPS obligation to preserve the resources with which it has been entrusted. However, the experience of the last several decades, characterized by appropriations that have decreased in relative value combined with numerous increased demands on the park staff, have resulted in a growing maintenance backlog and an observable deterioration in some primary resources. Filling vacancies in critical staff positions, as outlined in the No-Action Alternative, would provide some needed assistance in addressing the backlog, but would not be sufficient to remedy the diminished resource condition and provide a satisfactory visitor experience.

Action Alternative One, which proposes an expansion in staff and a larger role for volunteers, would enable the park to better fulfill its responsibilities as trustee of cultural and natural resources. Action Alternative Two would have a more pronounced beneficial impact, because it proposes greater reliance on partnerships and new sources of revenue, which would free park employees and funding to focus on management to a greater degree than Action Alternative One. As the experience of the last several decades indicates, reliance on a high level of sustained government support over the long term for operations and services, as is the case with Action Alternative One, even augmented with strong volunteer support, may not be as sustainable a management approach as it once was; whereas the integration of partners in many levels of operations and services, as is the case with Action Alternative Two, facilitates better resource preservation and stewardship over the long term. (Criteria #1 and #4)

All three alternatives seek to maintain the primary historic structures and collections in good condition and to present the historic homes as fully furnished interiors that reflect their period of

significance. Differences in treatment among the alternatives are evident primarily in the cultural landscape. In continuing current management practices, the No-Action Alternative would continue to permit field encroachment, naturalization of forest plantations, obstruction of views, and other types of unfavorable cultural landscape conditions. Action Alternative One, which seeks to present a more literal re-creation of the historic scene, seems at first to offer the best prospects for preserving cultural resources. It cannot be assured, however, that the NPS will be able to muster the resources needed to essentially freeze the parks at a fixed stage of development and maintain them in that state indefinitely. Action Alternative Two, by allowing greater flexibility, will actually provide better prospects of perpetuating the character-defining aspects of the parks' cultural resources and making them meaningful to the public. In relying more on re-establishing historic land uses, as opposed to strictly re-establishing historic appearance, it presents an approach to landscape management that is more practical, cost-effective, and sustainable over the long term, and thus more likely to succeed in preserving resources. (Criteria #1 and #4)

By encouraging flexibility of treatment and more diverse and imaginative interpretation, Action Alternative Two has the greatest likelihood of achieving healthful, productive, and aesthetically and culturally pleasing surroundings. This alternative, by improving the presentation of cultural resources, offers the best possibility of halting or even reversing the long-term decline in visitation at the Roosevelt sites. Making the parks more lively places and interpreting them in ways that demonstrate their relevance to contemporary concerns should increase the qualitative benefits of the parks, as well as stimulating greater and more varied use by the American public. Similarly, the greater scope of education under Action Alternative Two may more effectively renew interest in the parks and motivate new park stewards. (Criteria #2 and #3)

With respect to natural resources, the No-Action Alternative would convey certain minor benefits, as continued lack of management of the parks' forested areas would allow some greater diversity of habitats and species than in Action Alternative One. This limited improvement would be greatly outweighed by the overall lack of interpretive attention to these resources, and resulting lack of visitor understanding of their importance. Action Alternative One, by increasing certain uses and managing forest plantations, natural woodlands, and agricultural fields as more of a monoculture, reduces diversity and habitat value in some areas. These impacts would be balanced by the aspects of the alternative that would yield improved interpretation and visitor understanding. Under Action Alternative Two, the minor negative impacts would be further decreased by greater flexibility and the use of contemporary farming and forestry practices, which tend to better support natural resource values. In addition, natural resources would benefit from the various measures to introduce new stewards and find new sources of support for the preservation effort. (Criteria #3 and #4)

Action Alternative Two supports greater recreational use of the trails (compatible with the resources that make them nationally significant), and thus provides a wider range of choice for public enjoyment of the parks. The expanded trail use envisioned under Action Alternative Two, and to a lesser extent under Action Alternative One, may actually generate a collateral benefit toward wildlife, vegetation, and soils, as a greater public and staff presence would tend to curtail

illegal all-terrain-vehicle use in outlying areas. The No-Action Alternative would do little to reduce such continuing resource damage. (Criteria #3 and #4)

With its stress on stimulating interest in the parks, which should translate into more stabilized visitation, Action Alternative Two is expected to have a modest, but greater beneficial socioeconomic impact than the other alternatives. At the same time, its emphasis on partnerships and innovative programs should increase community involvement in the parks, which will support both preservation and a compatible diversity of uses. Moreover, it is consistent with the Roosevelts' ideals of active participation in government and civic life. (Criterion #4)

Criteria 5 and 6 are not substantially engaged or addressed differently by the actions proposed under any of the alternatives. Regarding Criterion 5, all alternatives strive to achieve a balance between population and resource use (i.e. carrying capacity) at the parks as described in Appendix E in the *Draft GMP/EIS*. Regarding Criterion 6, all alternatives seek to enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources by reducing the parks' carbon footprint and enhancing sustainability as described on pages 57 and 89 in the *Draft GMP/EIS*.

After evaluating the potential impacts of the alternatives on cultural and natural resources, the visitor experience, park operations, and the socioeconomic environment, the NPS has determined that Action Alternative Two is the Environmentally Preferred Alternative.

PUBLIC AND AGENCY INVOLVEMENT

The planning process for the GMP/EIS was conducted with extensive public and agency involvement that included meetings, workshops, briefings, wide distribution of planning newsletters, email announcements, and a formal public comment process. These activities are briefly summarized below and a detailed discussion is presented in Part Five of the *Draft GMP/EIS*.

Scoping

During 2005 and 2006, the planning team held meetings with key stakeholders, agencies, resource experts, and members of the public. Following this contact, the NPS distributed its first planning newsletter in October 2006, which presented the planning process, draft statements of purpose and significance, preliminary planning issues, and included a mail-back card inviting comment. In October 2007, the NPS distributed a second newsletter or "Progress Report" describing three preliminary alternatives, which also included a mail-back card inviting comment. Over the course of the next two years, the planning team continued to brief and receive input from stakeholders.

Public Comment

In December 2009, the NPS distributed the *Draft GMP/EIS*. The draft document was available for public and agency review from December 24, 2009 through February 28, 2010. More than 100 copies of the document were sent to individuals, agencies, and organizations, and several were made available at the parks' visitor centers and the local library. The draft document was posted on the National Park Service (NPS) Planning, Environment, and Public Comment (PEPC) website

(<http://parkplanning.nps.gov/rova>). In addition, some 3,400 printed copies of a 16-page summary of the draft plan were distributed to the public. Public open houses were held on January 28 and 29, 2010. Press releases, email notifications, and messages on the parks' nps.gov homepages were used to announce the availability of the document, as well as the public open house dates and times.

The NPS received 76 pieces of correspondence in the form of letters (seven), emails (three), comment sheets from the public open houses (six), and electronic comments submitted through the NPS PEPC website (60). From the 76 pieces of correspondence, the planning team identified nearly 185 comments, or statements about a particular issue. The team identified three comments as being substantive, with the overwhelming majority being non-substantive.

All commenters who identified a preference identified Action Alternative Two (the Preferred Alternative) as their preferred option. Many commenters stated support for particular components of the Preferred Alternative. There were no statements of support or preference for Action Alternative One or the No-Action Alternative. Recreational use of the trail system, specifically bicycle use, received the most attention of any issue. Other topics on which multiple comments were received included: coordination with trail volunteers, support for regional trail networks, support for proposed cultural landscapes management objectives, and support for enhanced educational programs.

Comments received on the *Draft GMP/EIS* required only minor changes and editorial corrections; therefore, an *Abbreviated Final GMP/EIS* was used to respond to and incorporate the comments received during the public and agency review. No changes were made to the alternatives or to the impact analysis presented in the *Draft GMP/EIS* as a result of public comments.

Tribal Coordination

At the outset of the planning process, the NPS initiated consultation via letter with Native American tribes historically associated with this area of the Hudson Valley. The tribes contacted were the Stockbridge-Munsee Community, the Delaware Nation, and the Delaware Tribe of Indians. Planning newsletters were sent to the tribes in October 2006 and October 2007. Copies of the *Draft GMP/EIS* and the *Abbreviated Final GMP/EIS* were provided to each tribe. The tribes provided no comment on either document. Consultation and coordination with the tribes will continue through implementation of the plan, as needed. This effort will also be continued through the Section 106 compliance process as specific actions are taken under the selected alternative.

Section 106 Consultation

Consultation with the New York State Historic Preservation Office (NY SHPO) was initiated in December 2005 and continued in October 2006 and October 2007 via newsletter mailings. Periodic updates on the plan were provided at the parks' regular biannual consultation meetings. In February 2010, the NY SHPO submitted comments on the *Draft GMP/EIS* indicating that the agency finds, "the preferred alternatives to various project initiatives to be both reasonable and appropriate. Although we cannot offer our formal opinion under Section 106 for projects until we have reviewed the specific details, these reviews have not been an issue between our offices."

Section 7 Consultation

Consultation with the U.S. Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act was initiated in December 2008 with regard to the status of federally-listed threatened and endangered species in the area. The USFWS response indicated that, due to increasing workload and reduction of staff, the USFWS now directs species list inquiries to its website (<http://www.fws.gov>). According to USFWS website, there are seven Federally listed endangered, threatened, and candidate species that are known or are likely to occur in Dutchess County. Within the project area, however, except for occasional potential transient individual animals, no Federally listed or proposed endangered species are known to be present according to the official National Park species list. The NPS found that there was no effect on any Federally listed species. The park will continue to consult with the USFWS, as needed, in accordance with Section 7 as specific actions are designed and implemented under the selected alternative.

New York State Species of Special Concern

According to the New York State Department of Environmental Conservation (NYS DEC) website and New York Natural Heritage Program data, the project area contains rare plants and animals and significant natural communities. The NPS will continue to consult with the NYS DEC as specific actions are designed and implemented under the selected alternative.

Coastal Management Policy Consistency

In March 2010, the Department of the Interior prepared a consistency determination in accordance with 15 CFR Part 930 Subpart C. The Department of the Interior determined that the plan and the means for its implementation would be consistent to the maximum extent practicable with the New York Coastal Management Plan. The consistency determination was submitted to the New York Department of State, Division of Coastal Resources. In April 2010, the New York Department of State concurred with the determination via letter. The coastal consistency determination and the New York State letter of concurrence were appended to the *Final GMP/EIS*.

CONCLUSION

The above factors and considerations warrant implementing the Preferred Alternative, Action Alternative Two, including the elements common to all alternatives, as described and analyzed in the *Draft* and *Abbreviated Final GMP/EIS* for Roosevelt-Vanderbilt National Historic Sites and this Record of Decision. The alternative selected for implementation will not impair park resources or values and will allow the NPS to preserve park resources and provide for their enjoyment by future generations.

ATTACHMENT A

FINAL IMPAIRMENT DETERMINATION FOR THE SELECTED ALTERNATIVE

Roosevelt-Vanderbilt National Historic Sites General Management Plan/EIS

THE PROHIBITION ON IMPAIRMENT OF PARK RESOURCES AND VALUES

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.

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 National Park Service 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.

The NPS has discretion to allow impacts on Park resources and values when necessary and appropriate to fulfill the purposes of a Park (NPS 2006 sec. 1.4.3). However, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006 sec 1.4.3).

Section 1.4.5 of *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 *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 concessionaires, 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 *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 (NEPA); consultations required under Section 106 of the National Historic Preservation Act (NHPA); 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.

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 relation to the decision.

Impairment Determination for the Selected Alternative

This determination on impairment has been prepared for the alternative selected for implementation as the approved General Management Plan for Roosevelt-Vanderbilt National Historic Sites, as described in this Record of Decision. An impairment determination is made for all resource impact topics analyzed for the selected alternative in the *Draft GMP/EIS* and *Abbreviated Final GMP/EIS*. An impairment determination is not made for visitor use and experience, park operations and facilities, or the socioeconomic environment because impairment findings relate back to park resources and values, and these impact areas are 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.

Based on the environmental impact analysis for cultural resources, consisting of cultural landscapes, historic buildings and structures, collections and archives, and archeological resources, the NPS determined that there are no identified permanent major negative impacts on a resource or value whose conservation (1) would be necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, (2) is key to the natural or cultural integrity of the park or to opportunities to enjoy it, or (3) has been identified as a goal in the park's general management plan or other relevant NPS planning documents. Thus, implementing the selected action will not constitute an impairment of cultural resources.

Based on the environmental impact analysis for natural resources, consisting of wildlife, vegetation, wetlands, soils, and topography, the NPS determined that there are no identified permanent major negative impacts on a resource or value whose conservation (1) would be necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, (2) is key to the natural or cultural integrity of the park or to opportunities to enjoy it, or (3) has been identified as a goal in the park's general management plan or other relevant NPS planning documents. Thus, implementing the selected action will not constitute an impairment of natural resources.