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FINAL
GENERAL MANAGEMENT PLAN
DEVELOPMENT CONCEPT PLAN
ENVIRONMENTAL IMPACT STATEMENT

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NATIONAL HISTORICAL PARK

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Memorandum

To: Regional Director, Southeast Region

From: Manager, Eastern Team, Denver Service Center

Reference: Natchez National Historical Park, Pkg. 101, Park General, PT 02A,
General Management Plan/Development Concept Plan/Environmental
Impact Statement

Subject: Transmittal of Printed Final Plan

Forwarded under separate cover are 50 copies of the referenced document for your use and distribution. We have sent copies of the document to all parties on the mailing lists provided to us by your office and by the superintendent, Natchez National Historical Park. We have sent 100 copies to the superintendent for further distribution to the public. Additionally, 15 copies are being forwarded to Jake Hoogland. It is our understanding that your office will distribute copies to all other appropriate parties within the Washington Office including Denis Galvin (five copies), the U.S. Department of Interior Natural Resource Library (three copies), and the training centers and Harpers Ferry Center.

Please note that this is an abbreviated final document. It becomes a complete document in conjunction with the draft document of which an equal number are being sent to your office.

If you have questions, please contact Carol McNulty-Huffman of my staff at 303-969-2462.

/s/ ROBERT J. SHELLEY

Robert J. Shelley

Attachment

cc:
Acquisition Branch, Denver Public Library, 1357 Broadway, Denver, CO, 80203,
w/c att.
WASO-774-Mr. Hoogland, w/15 c att.
Supt., Natchez, w/100 c att. (100 FEIS, 75 DEIS)

FINAL
GENERAL MANAGEMENT PLAN
DEVELOPMENT CONCEPT PLAN
ENVIRONMENTAL IMPACT STATEMENT

January 1994

NATCHEZ NATIONAL HISTORICAL PARK
MISSISSIPPI

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
DENVER SERVICE CENTER

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INTRODUCTION TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT

This document is an abbreviated *Final Environmental Impact Statement* for Natchez National Historical Park, and the material included here is to be integrated with the *Draft General Management Plan/Development Concept Plan/Environmental Impact Statement* (DEIS 93-10322). The abbreviated format has been used because the changes to the draft document are minor and confined primarily to factual corrections, which do not modify the analysis.

Use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 CFR 1503.4(c)). The

draft and final environmental impact statements together describe the final plan, its alternatives, all significant environmental impacts, and the public comments that have been received and evaluated.

For the reader's convenience, the 27 pages on which changes have been made to the draft plan have been reproduced in full, including page numbers, on the following pages. Text that is to be removed from the draft document appears as ~~remove~~. Text to be added appears as **add**. No changes have been made to maps or graphics.

**CORRECTIONS AND REVISIONS TO THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Draft Final
General Management Plan
Development Concept Plan
Environmental Impact Statement

Natchez
National Historical Park
Adams County, Mississippi

Three alternatives for future management and use of Natchez National Historical Park are analyzed in this document. Alternative 1, the status quo (continuation of existing trends) alternative, describes the continuation of current management strategies. The major change from existing conditions would be removal (if possible) of all structures from Fort Rosalie except the historic Stietenroth house, which would be used for NPS headquarters. The William Johnson house would be open for interpretive exhibits on black history, and the adjacent McCallum house for visitor contact and interpretation; there would also be interpretive exhibits at Under-the-Hill. Visitors would learn the story of antebellum Natchez (1840s to 1860s) at Melrose and the William Johnson house — the two NPS visitor contact areas. The Fort Rosalie site would be informally interpreted. No additional staff would be required. Except for the positive impact of stabilizing the bluff at Fort Rosalie, there would be only minor impacts on natural resources. Impacts on visitors and their experiences would be minor. The removal or relocation of structures at Fort Rosalie would cause major impacts on those residents and cultural resources. Alternative 2, the proposed action, would be a partnership between the Park Service and the people of Natchez. This alternative includes rehabilitating a downtown structure (location as yet undetermined) for use as the NPS administrative headquarters/visitor center; using the Stietenroth house as the interim NPS administrative headquarters; restoring the Melrose estate to an appropriate period; opening the William Johnson complex for more extensive interpretation of black history; removing all but one or two structures on the Fort Rosalie site (if possible) and making the site a more parklike setting, with trails and a picnic area; a special history study to provide necessary data to interpret the role of plantation slavery and cotton production through the park's interpretive program; developing interpretive media/exhibits and possibly tours at Under-the-Hill; and potentially developing many cooperative agreements with state and local government, business entities, and owners of historically significant resources to provide technical assistance for preservation and interpretation. Visitors would learn the story of Natchez from its beginnings to the present, a much broader scope than in alternative 1. Additional staff would be needed. There would be minor adverse impacts on natural resources, although bluff stabilization at Fort Rosalie would be a positive impact on that resource. There would be very positive impacts on visitors and their experiences. The removal or relocation of most structures at Fort Rosalie would impact those residents and cultural resources. Alternative 3 would provide a more enhanced and comprehensive view of the Natchez story than alternatives 1 and 2. The new NPS visitor center would be at the Fort Rosalie site, and the Stietenroth house would be used as NPS administrative headquarters. Other structures on the Fort Rosalie site would be removed or relocated as described in alternative 2. Except for the addition of a small visitor contact station, development at Melrose would be very similar to alternative 2. Treatment of the William Johnson complex, Fort Rosalie (except for the new visitor center), Under-the-Hill, and the partnership with the city would be the essentially the same as in alternative 2. Cooperative agreements would be the same as under alternative 2 with additional cooperative agreements for tours, special events, and design guidelines. In alternative 3 the Park Service would acquire interest in (or negotiate a cooperative agreement for) the preservation, restoration, and visitor use of an area cotton plantation, including evaluation of the site for inclusion in Natchez National Historical Park or as a separate unit of the national park system. More staff than under alternative 2 would be needed. The minor difference in terms of impacts between alternatives 2 and 3 would be the enhanced visitor experience, the chance to see the remains of an antebellum cotton plantation, and the additional cooperative ventures under alternative 3. *The Draft General Management Plan, Development Concept Plan, Environmental Impact Statement* was distributed in May 1993. Attached pages show the changes that came from the review and the responses to the six comment letters.

For further information about this document, contact the superintendent of Natchez National Historical Park at the following address.

Superintendent, Natchez National Historical Park
P.O. Box 1208
Natchez, Mississippi 39121
(601) 442-7047

SUMMARY

Natchez National Historical Park was established by Congress to preserve and interpret the history of Natchez, Mississippi. This ~~draft~~ *Final General Management Plan/Environmental Impact Statement* is prepared to support the objectives for which the park was established. The purpose of this plan is to establish and guide the overall management, development, and use of the park in ways that will best serve visitors while preserving the historic character and appearance of the resources.

Three alternatives for future management and use of the park are analyzed in this document. The alternatives range from continuing existing trends and management actions at two NPS visitor contact areas to a more comprehensive alternative that makes four NPS visitor contact areas open to visitors. All alternatives share the objective of preserving the park while continuing to provide for visitor understanding and appreciation of its resources and their stories.

Alternative 1, the status quo (continuation of existing trends) alternative, describes the conditions that would exist if current management strategies were continued. The Melrose estate would be maintained essentially as it is, and visitors would learn about the workings of the estate. Visitors would see the rehabilitated carriage house, the main house, and the dependencies. Exhibits on black history would be developed in the William Johnson house, and the adjacent McCallum house would be adapted for use as a visitor contact area. Visitors would gain some insights into the story of the free black society. At the Fort Rosalie site the historic Stietenroth house would

be used as NPS headquarters, and all other structures would be removed, if possible. Open space would be established. The fort site would be archeologically investigated and interpreted, the bluff would be stabilized, and the box factory (in the mid-level area of Fort Rosalie) would be removed.

Also, under alternative 1, the relation of plantation slavery and cotton production, an important part of the Natchez story, would be interpreted, and there would be a few exhibits on black history at Under-the-Hill. Limited staffing would mean that few cooperative agreements would be developed to help the community preserve and interpret the city's other significant historic resources. The interpretive story would focus on antebellum Natchez (1840s to 1860s).

Alternative 2, the proposed action, describes conditions that would be needed to meet congressional intent for establishing the park. The National Park Service would rehabilitate a building (as yet undetermined) in downtown Natchez for use as an NPS administrative headquarters/visitor center. At this center, as well as the administrative functions, there would be information about NPS and area resources and a video projection program about Fort Rosalie and Natchez. Visitors to Melrose would find a rehabilitated carriage house, tours of the main house, which would be restored to an appropriate period, and tours of the dependencies, some of which would be restored and/or rehabilitated. The old maintenance building would remain, and the greenhouse would be removed, ~~(if found to be nonhistoric)~~, and a new maintenance complex would be built.

INTRODUCTION

PURPOSE OF AND NEED FOR THE PLAN

Natchez National Historical Park was established by Congress by Public Law 100-479 (Oct. 7, 1988) to preserve and interpret the history of Natchez, Mississippi. This general management plan supports the objectives for which the park was established. Specifically, the enabling legislation ~~directs the National Park Service~~ establishes the park to

- preserve and interpret the history of Natchez, Mississippi, as a significant city in the history of the American South
- preserve and interpret the sites and structures associated with all the peoples of Natchez and its surrounding area, from earliest inhabitants to the modern era and including blacks, both slave and free
- preserve and interpret the region's social, political, and economic development, with particular emphasis on the pre- and post-Civil War eras
- preserve and interpret the region's commercial and agricultural history, especially in relation to the Mississippi River and cotton

The purpose of this general management plan for Natchez National Historical Park is to establish and guide the overall management, development, and use of the park in ways that will best serve visitors while preserving the historic character and appearance of the resources. This plan will guide park management for approximately the next 10 to 15 years.

THE VISION FOR THE PARK

Natchez National Historical Park will preserve and interpret the sites and structures associated with the history of the Natchez region and will foster an understanding of the social, political, and economic history of the Natchez region from prehistoric to modern times, with an emphasis on the cotton era (1795-1908).

BRIEF DESCRIPTION OF THE PARK

Natchez National Historical Park became an established unit of the national park system on October 7, 1988 (see appendix A). The park is in the city of Natchez in southwestern Mississippi, approximately 100 miles southwest of Jackson (the capital of Mississippi), 70 miles south of Vicksburg, Mississippi, and 90 miles north of Baton Rouge (the capital of Louisiana). Natchez, on the Mississippi River, is in Adams County and across the river from Louisiana (see Region map). Travelers can easily reach Natchez by car along U.S. Highway 84 from the east and west, U.S. Highway 61 from the north and south, and the Natchez Trace Parkway from Jackson. The nearest major commercial airports are in Jackson and Baton Rouge. In season, riverboats plying the Mississippi River carry tourists to Natchez.

Historically, Natchez was the beginning of the Natchez Trace, a primitive trail stretching about 500 miles to Nashville, Tennessee. Today the Natchez Trace Parkway and the Natchez Trace National Scenic Trail commemorate the old trace.

The park is comprised of three ~~NPS~~ owned separate properties — the Melrose estate (78.6 acres in NPS ownership), the William

PURPOSE OF AND NEED FOR ACTION

Johnson complex (about 1/3 acre in NPS ownership), and Fort Rosalie (32.48 acres being acquired by the Park Service) (see Vicinity map) — and a larger area known as the preservation district. The pre-Civil War Melrose estate was built by a wealthy cotton planter. This Greek Revival mansion is complete with original furnishings and intact outbuildings and has been well maintained and preserved over the years. The 19th century furnishings collection at Melrose is of museum quality and is directly associated with estate owners.

William Johnson, a slave who was freed, started out as a barber and eventually owned several barber shops, rental property, a farm, and timberland; he also kept a lengthy personal and business diary that offers glimpses of antebellum southern life and relations between whites and free blacks. His Greek Revival town house is in downtown Natchez.

Established by the French in 1715, Fort Rosalie was built on the bluff overlooking the Mississippi River, high above the insect-ridden bottomland. Significant archeological resources associated with Fort Rosalie may still exist.

There are two major environmental concerns that are being considered in the planning effort. Natchez is on a prominent bluff that rises 150 to 200 feet above the Mississippi River floodplain. Stability and erosion of the bluff (unconsolidated sediments) along the river are issues of concern for the residents of the city as well as the National Park Service. Severe erosion has at times caused loss of life and property damage. The Fort Rosalie site contains approximately 0.25 mile of riverfront property along the bluff.

~~Being a new unit of the park system, Natchez National Historical Park~~ The National Park Service has few facilities for visitors, although Melrose is open for

tours (and was part of a commercial tour before acquisition by the National Park Service).

NATIONAL SIGNIFICANCE

- Antebellum Natchez was a commercial, cultural, and social center of one of the greatest cotton-producing regions — the cotton belt of the American South.
- Natchez was the second largest slave market in the country.
- The sale of cotton, produced by thousands of plantation-based slaves, generated a concentration of power and wealth in Natchez that was unparalleled by other southern towns of comparable size.
- Cotton planters' opulent lifestyles can be seen in the architecturally distinctive antebellum estates, which represent one of the best preserved concentrations of significant antebellum properties in the United States.

In the decades leading up to the Civil War, Natchez became a commercial, cultural, and social center of one of the world's greatest cotton-producing regions — the "cotton belt" of the American South. Planters living in Natchez controlled vast plantations in Louisiana and the Mississippi Delta and in Alabama, Arkansas, and Texas as well. Thousands of slaves worked these plantations, some of whom were sold in Natchez, at the second largest slave market in the country.

The profits derived from cotton produced a concentration of power and wealth in Natchez that was unparalleled by other southern towns of comparable size. The planters' opulent lifestyles are

THE PRESERVATION DISTRICT

The legislation establishing Natchez National Historical Park outlines Congress' desire that the park be a community resource — ~~a park that actively reaches out to one where the National Park Service cooperates with the community to effectively tell the story of all the peoples of Natchez and a park that actively works to preserve Natchez' resources for future generations.~~

To carry out the purpose for which the park was established, Congress asked the Park Service to prepare a study of the properties in Natchez and its immediate vicinity that preserve and interpret the history specified in the act that established the park. Following completion of the study, Congress further directed establishment of historic districts in the city and its immediate environs; establishment of these districts would help preserve and promote interpretation of the resources that contribute to the understanding of the purposes of the act.

The completed study presents a single preservation district (instead of several additional historic districts). This preservation district encompasses most of the significant resources in the Natchez vicinity — approximately 6 square miles of the city — and includes 10 of the city's 11 national historic landmarks, all five National Register of Historic Places historic districts, and 41 individually listed national register properties (see Preservation District and Existing National Register Historic Districts map).

The National Park Service has no regulatory or management control over property within this preservation district, other than at the three NPS sites (Melrose, Fort Rosalie, and the William Johnson complex). However, within the preservation district legislation allows the Park Service to enter into cooperative

agreements and provide technical advice to government agencies, business entities, and owners of historically or culturally significant properties on issues such as interpretation, preservation, and signs in return for bringing the property within the scope of the park's purpose. NPS assistance would be provided ~~only in response to specific requests from the community to willing property owners.~~ The preservation district thus identifies a ~~"zone of influence,"~~ cooperative park that is considerably larger than the three properties that the Park Service has or is acquiring. Within this ~~zone area,~~ NPS resources and expertise ~~could~~ would be used to assist Natchez citizens to preserve and interpret the historic, cultural, and natural resources of their city for the enjoyment of all.

ADVISORY COMMISSION

Public Law 100-479 also established the Natchez National Historical Park Advisory Commission. This six-member advisory commission, appointed by the secretary of the interior, consists of two members appointed from among individuals nominated by the mayor of Natchez and one from among individuals nominated by the governor of Mississippi. The legislation also provided that two of the six members have expertise in historic preservation and one has expertise in architectural history. (This advisory commission has been meeting regularly since February 1992.)

SUMMARY OF MANAGEMENT OBJECTIVES FOR THE PARK

Management objectives, done for each NPS unit, provide a framework for conserving park resources, integrating the park into its surrounding environment, and accommodating public use in accordance with NPS management policies. Following

INTRODUCTION

This draft general management plan contains three alternatives for management of Natchez National Historical Park over the next 10 to 15 years: alternative 1, status quo (continuing existing trends); alternative 2, partnership park (the Park Service's proposed action); and alternative 3, expanded partnership park. These alternatives are described individually later in this section of the document.

There are, however, some elements that are common to all alternatives — the parkwide interpretive themes and some planning decisions regarding, for example, the visitor center, Grand Village,

and special populations. These common elements are described first so that the reader has a basis for better understanding the alternatives. Two sections on the management of the natural and cultural resources are presented after the description of the alternatives. These two sections also contain elements that are common to all alternatives. A summary comparison of the alternatives is shown in the General Development maps and in table format at the end of this section. A summary comparison of the environmental impacts of each alternative is also shown in table format.

ALTERNATIVES INCLUDING THE PROPOSED ACTION

actions associated with gambling will need to be monitored and the Park Service will need to work with the city and gambling interests to address concerns and minimize impacts.

Grand Village and Its Relationship to the Park

The Grand Village of the Natchez is a national historic landmark within the city limits of Natchez. Administered by the Mississippi Department of Archives and History, the site contains a visitor center, mounds and plazas, and reconstructed Natchez Indian structures. Several archeological investigations have occurred at the site over the years. For the purposes of this planning effort, Grand Village is considered the primary area to tell the story of American Indians within a regional context.

NPS Visitor Center

As a part of this planning effort, the National Park Service has considered two basic options for providing a visitor center in Natchez. One option is for the National Park Service to have its own visitor center in downtown Natchez. A second option calls for the Park Service to join with the city and state in a combined facility.

The planning effort for this management plan has highlighted the difficulty in determining an appropriate site for an NPS visitor center. There are many unknowns and many decisions, which are years ahead and outside the scope of this plan, that are needed before an appropriate site can be chosen: How might gambling-associated development affect the city, the park, and the traffic flow? Where will the Natchez Trace

Parkway come into Natchez? Should the visitor center be associated with the route chosen? Should the center be in a historic building, and if so, which would be appropriate in terms of size, location, condition, significance, possibility of acquisition, and environmental and historic preservation concerns?

Alternative 2, which presents an NPS administrative headquarters/visitor center in downtown Natchez (exact location undetermined), and alternative 3, which presents a new visitor center at Fort Rosalie will serve visitor/NPS needs for the life of this plan (10 to 15 years).

Future planning will determine the requirements for a permanent NPS visitor center. An environmental study will be done at that time.

Combined City-State Welcome/Visitor Center

In the first stages of planning and contact with city and state officials, the National Park Service explored the possibility of providing visitor services and interpretation at a combined welcome/visitor center, east of the toll plaza and south of Simmons Street. There continues to be substantial local interest in the concept of a combined welcome/visitor center. The city has received a \$30,000 planning grant from the Mississippi Department of Transportation to identify a site and provide conceptual design services for the proposed facility. In addition, the city was awarded a \$3.42 million Intermodal Surface Transportation Efficiency Act enhancement grant toward the development of a \$7.13 million visitor/transportation center. The visitor center would include a transportation component, designed to alleviate

problems associated with inadequate downtown parking space and traffic congestion due to increased tourism.

The city has invited the Park Service to participate in the visitor center study. Because the city is subject to many of the same financial constraints facing many state and local governments, and because of the potential funding and management benefits of a partnership arrangement, the Park Service has agreed to work with the city on this project. Should plans for the combined visitor center and transportation component move beyond the idea stage in a timely manner, and if the Park Service determines that the facility would meet its long-term needs in Natchez, the Park Service could decide to discontinue efforts to develop its own visitor center and enter into a formal agreement with the city and the state to develop a

combined facility. Factors that the Park Service would have to take into account before making such a decision would include the facility's location and size, how well it would meet the needs of park visitors, whether the facility could also accommodate the administrative headquarters for Natchez National Historical Park, and whether it would be possible to construct and manage the facility on a cost-sharing basis that would be fair and equitable. Further environmental compliance would be needed if a decision is made to build a joint visitor center.

Although some information would be available regarding visitor attractions in Natchez, especially NPS facilities, the primary purpose of the welcome/visitor center would be to tell the interpretive stories of Natchez.

Alternative 1: Status Quo (Continuing Existing Trends)

exterior and would continue to house mechanical equipment for the complex. The dairy would continue with existing exhibits and an added interpretive panel. Half of the privy next to the dairy has been converted to modern restrooms for public use; the other half remains as a historic privy and would be open for interpretation. The cisterns would be preserved.

The north slave cabin (adapted by a previous owner for employee housing) would be used as housing for park staff to provide onsite security or as additional administrative space. The south slave cabin would be open to visitors, with no attempt to furnish the rooms to their historic appearance. The cabins and the roles of the slaves and post-Civil War servants in estate operations would be interpreted in this cabin. The stable, with interpretive panels inside, would interpret the features and functions of a working estate. Buildings would maintain their modern amenities and certain incongruities of furnishings and architectural appearance.

The gardens and grounds would be open for the public to enjoy. The northern boundary of the estate would be fenced to protect the grounds from the encroachment and trash dumping that currently occurs. The gazebo would be removed. The fishing dock on the pond would remain, and the pond and dam would be managed according to NPS guidelines, *Dams and Appurtenant Works — Maintenance, Operation, and Safety* (NPS-40). See later "Natural Resource Management" section for further information about other studies and actions related to protecting and preserving the natural resources.

The existing maintenance building and adjacent greenhouse would also remain; but the greenhouse would be removed.

Curatorial space would be provided in a structure sited by the existing greenhouse. Otherwise, no new construction would be provided for the buildings or grounds.

The additional footpaths shown on the site plan map are only representational; exact locations would be determined by an onsite survey to ensure minimal damage to trees, shrubs, plants, and archeological or cultural landscape values.

Except for necessary maintenance work, public parking (with designated spaces for persons with disabilities), staff parking for the main house, and roads and walkways would remain as they now exist (gravel surfaces). Access for persons with disabilities would be provided throughout the Melrose site where modifications would not adversely affect the architectural integrity of the structures or the historic qualities of the structures or grounds.

Historical, archeological, and architectural investigations and evaluations on all structures and the grounds would properly document the site's history. This intensive research, including a rewrite of the existing inadequate national historic landmark nomination, would be necessary before work on the main house or the grounds begins. In some instances, research results may change proposed development. The existing landscape would be preserved, maintained, and/or restored based on the cultural landscape report that would be done.

The "Cultural Resource Management" section contains further information about studies and actions relating to protecting and preserving the cultural resources.

interim, especially during restoration work, a chain link fence would be used.

Access to the structures and grounds would require about 200 square feet of new brick walkway. Access for the mobility impaired would be provided to the first floors of the two main buildings.

Parking for staff would be provided behind the McCallum house. Because the parking area belongs to the adjacent landowner, a cooperative agreement would have to be arranged between the Park Service and the landowner. Parking for visitors with disabilities would be on State Street.

Ultimate use of spaces in all three buildings, however, would depend on the results of historical research and structural and architectural studies. Some or all of the proposed use might not occur because of structural deficiencies.

FORT ROSALIE

Fort Rosalie was the site of the initial European settlement at Natchez. Walking through the site offers views of the mighty Mississippi and the chance to enjoy open space. The Fort Rosalie area is being acquired by the Park Service. No aboveground features of Fort Rosalie have been positively identified.

Under this alternative, the Fort Rosalie site would be established as open space through the removal of all structures except the Stietenroth house and through subsequent landscaping (see Fort Rosalie Alternative 1 map). The historic Stietenroth house would be rehabilitated for use as NPS administrative headquarters. (See table 1 at the end of this section for a definition of rehabilitation, preservation, etc.)

Structures that are on or eligible for inclusion on the National Register of Historic Places would be moved to a suitable location, if determined feasible in consultation with the state historic preservation office. Full documentation of historic structures would be undertaken for all structures removed from the site. Structures eligible for the national register may lose this designation if they are moved from their original location. If it is not possible to remove one or more of these historic structures, the Park Service would find uses for these structures — such as for NPS staff housing, storage, administration, or possibly visitor use.

The National Park Service and the state historic preservation office have already agreed informally that 13 of the buildings currently on the Fort Rosalie site could be demolished because they are either noncontributing, intrusive, or so marginal that they do not warrant preservation. The Park Service is in the process of seeking formal determinations of national register eligibility of the structures on Fort Rosalie. ~~The results of this process will be included in the final plan/environmental impact statement.~~ The Park Service would continue to consult with the state historic preservation office throughout this process.

An interim *Land Protection Plan* for the park was approved in June 1991 with the intention of revising it to reflect recommendations or ideas that come out of this general management plan.

The mid-level area of Fort Rosalie (between D.A. Biglane Street and the bluff and above Natchez Under-the-Hill) would be returned to open space (with removal of the parking lot). Any remnants of the box factory would be removed for safety reasons. No visitor facilities would be provided; however, the Park Service would encourage independent visitor use

ALTERNATIVE 2: PARTNERSHIP PARK (PROPOSED ACTION)

EMPHASIS

As in alternative 1, under alternative 2 the same stories of a rich cotton planter's life, the workings of an estate household, urban slavery, and the free black society would be told at Melrose and the William Johnson complex. However, with the addition of visitor use and interpretation at Fort Rosalie, the larger story of Natchez and its beginnings would also be told. The story of plantation slavery, so important to understanding the story of Natchez, would be told through interpretive media.

Also under this alternative, the city would in essence become the park. The Park Service would provide technical assistance for preserving and interpreting many historic properties within the city; upon request; in turn, property owners would be encouraged to incorporate the recommendations for preservation treatments and interpretive tours.

The emphasis of alternative 2 would be to provide a comprehensive visitor experience throughout the city — at historically or culturally significant properties (mostly privately owned) and at Melrose, the William Johnson complex, Fort Rosalie, and an NPS visitor center. The focus of the story would be Natchez from its beginnings to the present, a much broader treatment than in alternative 1. In addition, there would be more restoration, interpretive media, and personal services, including costumed interpretation and living history, and many more sites at which to more effectively tell the story of Natchez.

Alternative 2 represents a partnership concept between the Park Service and the people of Natchez.

Visitors coming into Natchez would be directed to the visitor center (see below). There they would find information about the other NPS sites as well as the various resources in the city. Visitors could then decide which resources to visit in whatever order they wished.

VISITOR CENTER

Questions have been raised during the planning process regarding the need for an NPS visitor center in Natchez. During scoping sessions, meetings with various groups and organizations, and public meetings, the need for a visitor center has been repeatedly affirmed. The most commonly asserted reasons for a visitor center were to

- provide a sense of arrival to Natchez, something that currently does not exist
- provide a central location where visitors can be oriented to the city and its resources (Currently, visitors typically just happen upon one of the places where they can get information — for example the state welcome center, the Chamber of Commerce, the Convention and Visitors Bureau, Natchez Pilgrimage Tours, or NPS headquarters; the information visitors receive is often different and sometimes conflicting.)
- provide a logical overview of the city's history and resources

~~In light of the purposes just described and the fact that the individual sites (Melrose, William Johnson complex, and Fort Rosalie) cannot adequately fulfill all of these purposes, the need for a visitor~~

ALTERNATIVES INCLUDING THE PROPOSED ACTION

~~center seems apparent and is included in this alternative.~~

The visitor center would serve to pull the various themes/stories of Natchez together through personal services and interpretive media, including a video projection program in the theater. It would be the place for the interpretive program to focus on the "big picture" of Natchez' history and significance and to place individual sites in a larger context. The interpretive program at the visitor center would also present those themes/stories that are not represented at a specific site.

It is important to note that the visitor center would not duplicate the services, programs, tours, etc. being provided by Natchez Pilgrimage Tours or by other publicly or privately managed historic sites. In addition to thoroughly familiarizing the visitor with major interpretive themes and how they relate to cultural sites and properties in and around Natchez, a primary goal for a visitor center would be to present visitors with the various options for visiting sites and properties regardless of what organization or group owns or manages them. This would allow visitors to make the best use of the time they plan to spend in Natchez, whether that is a few hours, a day, or an entire week.

An easy-to-find location is critical in establishing the visitor center as a point of arrival. It should be a first stop for people, not something they find after visiting other sites. An information desk and lobby displays generally provide the information/orientation functions. Interpretive media (for example, exhibits, audiovisual programs, and publications) relate aspects of the major themes and place them in proper context. These media usually have greater impact when associated with nearby resources that can be seen. In short, the visitor center should

be easy to find, associated with the significant resources, and large enough to perform its functions. See appendix C for more details about requirements for a visitor center.

In the course of the planning process in 1990-91, several sites for a downtown visitor center were examined. Considerable analysis of the railroad depot at Broadway and Franklin streets was done. However, uncertainty over the development of gambling facilities downtown and the final determination of the Natchez Trace Parkway route into Natchez have precluded a final decision on a visitor center site. As of December 1991, the railroad depot is no longer being considered for a visitor center because of the environmental issues surrounding bluff erosion (see appendix F).

The visitor center function would be combined with space to be acquired for the park's administrative headquarters (see discussion under "NPS Headquarters/Administration" section).

MELROSE

Built by a wealthy planter, Melrose symbolizes the apex of the cotton-based culture and the dominance of Natchez in the King Cotton economy. The story at Melrose would show how a wealthy cotton planter lived and tell how this wealth depended on cotton crops and the slave labor system on plantations that were outside of Natchez.

After driving down the slightly realigned entrance road, visitors arriving at Melrose would be directed toward the carriage house en route to the parking area (see Melrose, Alternative 2 map). At the carriage house visitors would purchase tickets to the main house and obtain a

Alternative 2: Partnership Park (Proposed Action)

map and information about touring the grounds; restrooms, a few exhibits, and a cooperating association sales outlet would also be in the carriage house. The exhibits would emphasize the relationship of Melrose to the cotton plantations owned by John T. McMurrin and the relationship of Melrose to other wealthy cotton planters' estates in Natchez; introduce the various owners of Melrose; explain why Melrose is significant and why it has been so well preserved; and describe Melrose in the old movies that portray the images, myths, and realities of Natchez. Unlike alternative 1, there would be no video projection program offered at the Melrose site.

Interior changes to the carriage house would follow extensive recordation of its appearance, using photography and measured drawings. The exterior would be restored to an appropriate period that would allow continued use of the existing doors. (See table 1 at the end of this section for a definition of restoration, preservation, etc.) The ticket booth in the visitor parking area would be removed.

From the carriage house, visitors would go to the main house for a guided tour of both floors. The McMurrin period is felt to be the most significant period to interpret. The emphasis of the house tour would be further defined following the historic furnishing report called for in the "Cultural Resource Management" section (later in this document). Architectural investigations would be needed to guide the implementation of this report.

If access to the second floor cannot be provided, programmatic accessibility (see appendix B) would be provided.

Upon leaving the main house, visitors could tour the dependency buildings and grounds, the interpretation of which would focus on the antebellum period and include the operation of a cotton planter's

estate, its dependence on slave labor, and its relation to the Natchez community.

The main house and selected portions of the grounds at Melrose would be restored to an appropriate period, based on historical, archeological, and architectural research. (See "Cultural Resource Management" section for further information about studies and actions related to protecting and preserving the cultural resources.) The kitchen and dairy would be restored and furnished to the antebellum period provided further study indicates that this is possible. The smokehouse next to the kitchen would be restored on the exterior but would continue to house the mechanical equipment for the complex. The privy, with exterior restoration, would be maintained as is — half as a public restroom and half as a historic privy. The cisterns would be restored. Should restoration to a specific period prove infeasible, the house and grounds would be maintained in their present condition. The state historic preservation office would be consulted on any decisions made regarding the period to which the buildings would be restored.

The north slave cabin would be partially restored on the exterior and rehabilitated on the interior for use as housing for park staff to provide onsite security or as additional onsite administrative space. The interior and exterior of the south slave cabin would be restored and open for visitor use. Two of the three rooms would be furnished as slave quarters (pre 1865) if documentation can be found to accurately do so; the third room would serve as an exhibit area and open interpretive space. The slave privy would be restored on the exterior and preserved on the interior. As in alternative 1, the stable would be open to visitors, and text panels inside would interpret key features and functions of a working estate.

ALTERNATIVES INCLUDING THE PROPOSED ACTION

The gardens and grounds would be open for the public to enjoy. The northern boundary of the estate would be fenced to protect the grounds from encroachment and trash dumping that currently occurs. The gazebo in the nearby pond would be removed. The small dock at the south end of the pond would remain. The pond and dam would be managed according to NPS guidelines, *Dams and Appurtenant Works — Maintenance, Operation, and Safety* (NPS-40).

A cultural landscape report would be done, which would provide recommendations on managing/preserving/restoring the gardens and grounds. The report would determine what part of the estate would be essential to achieving the management objective for Melrose, which requires preservation and restoration of the structures, collections, and grounds (see previous "Summary of Management Objectives for the Park" section). This report would also identify the placement of fences, gardens, and other features that would contribute to the visitor's understanding of a working estate. The Park Service would coordinate with the city and others having lands and structures that can be seen from the core area of the estate to minimize visually intrusive elements. See later "Natural Resource Management" section for further information about other actions related to the natural resources.

~~The process of determining if the existing maintenance building and greenhouse are contributing elements to the Melrose National Historic Landmark has been initiated. If the maintenance building and greenhouse are determined to be significant and contributing elements to the national historic landmark, they would be preserved and/or restored.~~

~~However, if research determines that the maintenance building and greenhouse are nonhistoric and noncontributing, they would be demolished. The building used as a maintenance building (formerly a barn/stable) has been determined to be a~~

~~contributing historic element to the Melrose National Historic Landmark; it would be preserved and/or restored. The greenhouse, a noncontributing nonhistoric element, would be removed. A new maintenance complex would be constructed in the open field adjacent to Melrose-Montebello Parkway. The new 3,500-square-foot structure would have a vehicle repair bay, a carpentry bay, an office, a multipurpose room for lunches, meetings, and work sessions, storage space, a toilet and shower, utilities, and, if necessary, a greenhouse. The existing maintenance building site would become a staff parking area.~~

There would also be a paved yard (about 6,500 square feet) for vehicle and equipment parking and a covered storage area (about 1,250 square feet). The existing path from the old maintenance area to the back of the estate and new staff parking would be upgraded. The entire complex (about 25,000 square feet) would be surrounded by a 7-foot chain link security fence. Although the field where the complex would be is already partially screened from the parkway by trees and shrubs, proper siting of the complex and additional trees and shrubs would make it even less visible. The row of mature cedar trees along the maintenance road should be retained to provide screening. (The map locations of the maintenance complex and relocated service road/parkway intersection are approximate.) The complex would be sited, among other factors, to avoid removing major stands of trees and harming any state-listed species or wetlands and to take advantage of existing vegetative screening.

The maintenance complex site would be advantageous because it would separate the maintenance and visitor use functions — the complex and the historic buildings would be separated by several heavily wooded acres that effectively screen out the audiovisual impacts of the maintenance function. A vegetation

ALTERNATIVES INCLUDING THE PROPOSED ACTION

changes based on information from future studies and research. The "Natural Resource Management" section contains further information about studies and actions relating to protecting and preserving the natural resources.

Thorough historical and archeological studies would be completed before implementing any actions. The "Cultural Resource Management" section contains further information about studies and actions relating to protecting and preserving the cultural resources.

FORT ROSALIE

Fort Rosalie was the site of initial European settlement at Natchez. Walking through the site offers views of the mighty Mississippi and the chance to enjoy open space. The Fort Rosalie area is being acquired by the Park Service. No aboveground features of Fort Rosalie have been positively identified.

All structures would be removed except the Stietenroth house and one or two other historic buildings that would be used for visitor contact, NPS staff quarters, or other park purposes. The Stietenroth house would be rehabilitated for use as interim park administrative headquarters and later visitor use/staff housing. (See table 1 at the end of this section for definitions of rehabilitation, preservation, etc.)

Structures that are on or eligible for inclusion on the National Register of Historic Places would be moved to a suitable location, if determined feasible in consultation with the state historic preservation office. Historic structures would be documented before removal from the site. Structures on or eligible for the national register may lose this designation if they are moved from their

original location. If it is not possible to remove one or more of these historic structures, the Park Service would find uses for them — such as staff housing, storage, or possibly visitor use.

The National Park Service and the state historic preservation office have already agreed informally that 13 of the buildings currently on the Fort Rosalie site could be demolished because they are either noncontributing, intrusive, or so marginal that they do not warrant preservation. The Park Service is in the process of seeking formal determinations of national register eligibility of the structures on Fort Rosalie. ~~The results of this process will be included in the final plan/environmental impact statement.~~ The Park Service will continue to consult with the state historic preservation office throughout this process.

An interim *Land Protection Plan* for the park was approved in June 1991, with the intention of revising it to reflect any substantive recommendations or ideas resulting from this completed general management plan.

A more parklike setting would be created at Fort Rosalie (see Fort Rosalie, Alternative 2 map). Site interpretation and landscape maintenance on the site would be greater in alternative 2 than in alternative 1. Fort Rosalie and the river would be interpreted through a video projection program at the visitor center and through an interpretive trail on the bluff that would have wayside exhibits covering many topics related to the fort and the river. The trail (of surface stabilized materials) would be approximately 1,000 feet long (14,000 square feet). The trail would be set back from the bluff edge and meet all bluff stabilization criteria developed for this area (the critical area for bluff stabilization

CULTURAL RESOURCE MANAGEMENT

GENERAL CULTURAL RESOURCE MANAGEMENT

The purpose of this section is to set forth some cultural resource management actions and studies that would be undertaken under any of the three alternatives just described and to guide the cultural resource management section of the resource management plan that will be written for the park. Under NPS policies, each park must have a resource management plan.

Cultural resource management serves to preserve and perpetuate the park's cultural resources. Proposed strategies for managing the cultural resources are in response to the issues identified in this general management plan. Resources are not to be destroyed or impaired by the type or amount of use they would receive under the different alternatives, and management strategies must reflect the capacity of the resources to accept use without degradation.

However, before actions can be taken to prevent damage to the park's cultural resources, it is necessary to find out exactly what is there, what is the best strategy for preserving and/or protecting the particular resource, how best to maintain it, and how much use it can tolerate without degradation. The following basic cultural resource plans and plans related to interpretation of the natural and cultural resources are needed at Natchez National Historical Park:

- Archeological evaluation studies
- Black history study (a draft of this study is complete)
- Carrying capacity studies for each structure open to the public
- Collection condition survey

- Collection management plan
- Collection storage plan
- Cultural landscape report
- Resource management plan
- Exhibit plan
- **Ethnographic overview and assessment**
- Historic furnishings reports (Melrose and William Johnson complex)
- Historic resource study (the park)
- Revised national historic landmark nomination for Melrose
- Revised national register nomination for Fort Rosalie and William Johnson complex
- Historic structure preservation guides
- Historic structure reports (Melrose and William Johnson complex)
- Oral histories of former residents and employees
- Park administrative history
- Scope of collection statement
- Special history study (cotton plantation, alternatives 2 and 3)
- Special resource study (cotton plantation, alternative 3)

To construct adequate data for ongoing maintenance of the historic scene, historic settings around or adjacent to structures would be included in these reports. Specific structure evaluation and preservation actions would be applied to each building to protect and/or enhance existing cultural remains.

The national historic landmark nomination for Melrose clearly needs to be revised. Written in 1974, the nomination contains very little data to help guide management, preservation, and visitor use needs at the site. Resources are described only minimally, and criteria for significance and contributing elements are barely touched upon. This work should be a priority, to further define the national significance of Melrose.

TABLE 2: SUMMARY COMPARISON OF ALTERNATIVES

	Alternative 1 — Continuation of Existing Trends	Alternative 2 — Partnership Park (Proposed Action)	Alternative 3 — Expanded Partnership Park
Emphasis	Visitors would learn about Melrose and the workings of the estate household — the story of a rich cotton planter's life. Minimal interpretation at Fort Rosalie of Natchez' early history. Some insights given into free black society and urban slavery. Focus of story would be antebellum Natchez (1840s to 1860s).	Visitors would learn about Melrose and the workings of the estate household, and about urban slavery and the free black society at the William Johnson complex. However, with more interpretation at Fort Rosalie, the larger story of Natchez and its beginnings would also be told. The important story of plantation slavery and cotton production would also be told through interpretive media. The city would, in essence, become the park. The emphasis would be a comprehensive visitor experience throughout the city as well as at the three NPS locations and the visitor center. There would also be more exhibits, personal services, restoration, interpretation, and many more sites to more effectively tell the Natchez story. A true partnership between the Park Service and the people of Natchez would be the result.	The emphasis of this alternative would be much as described in alternative 2, with the addition of a cotton plantation where visitors could see the site of an antebellum cotton plantation and learn about plantation slavery and cotton production. With a larger staff and four NPS sites, interpretation and thus the visitor experience would be the most comprehensive of the three alternatives. This alternative represents an enhanced partnership with the people of Natchez.
Visitor Center	Visitor information provided at Melrose and McCallum house; no formal NPS visitor center.	NPS visitor center at undetermined downtown site (combined with NPS administrative headquarters). Video projection program about Fort Rosalie/Natchez at theater in center.	New NPS visitor center at undetermined location at Fort Rosalie. Video projection program about Fort Rosalie/Natchez at theater in center.
Melrose	Melrose would be key site to tell the story of the cotton-based economy/culture of Natchez. Visitors would see video program about Melrose in carriage house, then tour the main house (no change from time of NPS acquisition), and follow a self-guiding brochure to tour dependencies. Dairy would have existing exhibits plus new interpretive panel; kitchen would be a cooperating association sales outlet. North slave cabin used as staff housing or for other administrative purposes. South slave cabin (exterior restoration) open to visitors (no interior restoration). Many research studies would be needed before implementation.	Melrose would be key site to tell the story of the cotton-based economy/culture of Natchez. Information and tickets at carriage house, which would also have a few exhibits and cooperating association sales. No video program would be provided. Tours of main house and dependencies. Main house and selected portions of grounds restored to appropriate antebellum period (if possible). North slave cabin restored on exterior and used for administrative purposes. South slave cabin restored on interior and exterior; two rooms restored as slave quarters (if possible). Parking for 47 vehicles (including buses and RVs). New and upgraded walkways would connect various areas. New maintenance complex built on site; existing maintenance building preserved, and greenhouse removed, if appropriate. Research studies would be needed before implementation of any actions.	Same as alternative 2, except for an open view of the main house from the entrance road and the construction of a small visitor contact station near the parking area.

NATURAL AND CULTURAL RESOURCES

REGIONAL CULTURAL RESOURCES

Adams County, Mississippi

The city of Natchez is in Adams County, along the lower Mississippi River in the southwestern portion of Mississippi (see Region map). The county is contiguous to Jefferson, Franklin, and Wilkinson counties in Mississippi and Concordia Parish in Louisiana. Many recognized regional cultural resources are related to Natchez' history. In addition to the numerous historic landmarks and national register properties and districts in Natchez, Adams County contains cultural properties that are significant in local, regional, and national history contexts, as well as traditional ethnographic resources significant to African-Americans and other local ethnic groups. The following sites are representative of significant cultural resources in Adams County outside of Natchez:

The nationally significant Emerald Mound site, on the Natchez Trace Parkway, was a major late prehistoric Plaquemine and historic Natchez culture ceremonial center. Emerald Mound is a massive, flat-topped platform mound and is the second largest late prehistoric earthwork in the United States.

The site of Fort Dearborn is in the vicinity of Washington, Mississippi, which served as the territorial capital of Mississippi. The timber fort housed U.S. troops in 1802-03 and served as a fortification for the territorial interior, but lost its military significance with the Louisiana Purchase.

The Assembly Hall, in Washington, Mississippi, is believed to be the meeting place of the legislative body of the Mississippi Territory (1709 to 1817), serving from ca. 1808 until

1811. It is one of the few surviving buildings from Mississippi's territorial period. It is also the sole known example in Mississippi of a Natchez Trace tavern built specifically for commercial use.

The Elizabeth Female Academy, outside Washington, was the first chartered (in 1818) institution for women's higher education in the South. The building is in ruins.

Jefferson College, also in Washington, was incorporated by the Mississippi territorial legislature in 1802 and opened its doors to students in 1811. Mississippi's first constitution was written and signed in the old Methodist Church on the college campus; the college is the birthplace of Mississippi's statehood.

Significant plantation houses in Adams County, noted for their architecture, are Bedford, Beechland, Brandon Hall, Buie House, Cedar Grove, The Cliffs, Cherry Grove, Edgewood, Fair Oaks, Foster's Mound, Glen Mary, Hillside, Laurel Hill, Magnolia Hill, Mistletoe, Montpelier, Mount Olive, Mount Repose, Oakland, Oakwood, Saragossa, Selma Plantation House, Smithland, Warren-Erwin House, and Woodstock. Both China Grove Plantation and Glen Aubin have histories of black ownership, being purchased by former slaves or their children in the years immediately after the Civil War. Mistletoe was built by slave craftsmen. Only China Grove, and Saragossa have extant tenant houses or slave quarters. Cedar Grove contains a cemetery for plantation slaves.

Fort Rosalie Site. The site of the original Fort Rosalie, where the colonial and territorial aspects of Natchez' history could be told, is on 32.48 acres on a hill west of South Canal Street. Several frame houses are on the site. Between the fort site and the Mississippi River is a cleared terrace where ancillary buildings, including the commandant's house, a Catholic church, and a priest's house, were located in the 1720s. West of this terrace, at the river, was the fort's old river landing. The site maintains much of its topographical integrity; the fort site on the knoll and terrace are essentially intact. Limited archeological testing at the fort site by the Mississippi Department of Archives and History resulted in the discovery of 18th century artifacts as well as one feature believed to be a portion of one of the fort's ramparts. Other archeological remains could exist and be excavated, although their significance is not known.

Fort Rosalie contains many structures in addition to the archeological fort site. These are on South Canal, Green, Rumble, and D.A. Biglane streets. There are seven significant historic buildings eligible for listing on the National Register of Historic Places, six of which are frame residences and date ca. 1880s to 1900. All of these structures possess high/excellent architectural integrity and are in poor to good condition. One significant historic building is log, dates to pre-World War II, and is a remnant of a "reconstruction" of Fort Rosalie. It possesses high architectural integrity and is in fair condition.

Seven buildings on the site are marginally significant. They are frame or board-and-batten residences and are in fair to good condition. One house dates to ca. 1904, one to 1920, and the remainder from 1925-1946.

Six buildings on site are noncontributing because of deterioration or unsympathetic alterations. All are frame, in poor to deteriorated condition, and lack architectural integrity. Four of these buildings were built ca. 1900, and two date from 1925-1946.

Eight buildings/structures are considered intrusive in appearance. These are frame or brick houses or garage structures that range in condition from good to deteriorated. No construction date has been determined for three of the buildings; the others range from 1925-1950. One of the structures is a brick tower associated with a ca. 1920 box factory on D.A. Biglane Street. The tower is in reasonably good condition, but other associated structures are in ruins.

The National Park Service and the state historic preservation office have already agreed informally that 13 of the buildings currently on the Fort Rosalie site could be demolished because they are either non-contributing, intrusive, or are so marginal that they do not warrant preservation. The Park Service is in the process of seeking formal determinations of national register eligibility of the structures on Fort Rosalie. ~~The results of this process will be included in the final plan/environmental impact statement.~~

D.A. Biglane Street, which winds through the Fort Rosalie site from Compress and South Canal streets to Natchez Under-the-Hill was improperly designed and lacks stability. Although maintenance for this street would continue to be the responsibility of the city, problems that develop along the road could become problems for adjoining NPS property. Private developers have recently constructed a parking lot in this mid-level area.

ENVIRONMENTAL CONSEQUENCES

eventual loss of such a resource if monies are not provided for preservation.

Significantly fewer avenues for NPS technical assistance to owners of historically significant properties in the preservation district and few if any cooperative agreements would be available or undertaken under this alternative (compared to the other two alternatives); the effect of this is difficult to calculate, but preservation would not be enhanced. Any staff assistance would be strictly on an as time permits basis.

Alternative 1 provides the least opportunity for preservation of cultural resources in Natchez.

IMPACTS ON NATURAL RESOURCES

Impacts on Geology and Soils

Generic bluff stabilization measures at Fort Rosalie, including control of all sources of water within one to two blocks of the bluff, removal of large trees close to the bluff, and possibly placing a grassy, 18-inch dike about 5 feet from the edge of the bluff to help control runoff, would help protect the bluff from further erosion. An integrated approach to protection of the entire bluff — top, slope, and toe — would help protect and stabilize the bluff. Additional site-specific mitigation measures (for example, ~~changing the bluff angle and/or~~ removing vegetation that aggravates erosion and replacing it with vegetation that would help stabilize) would also help protect and stabilize the bluff. The installation of an inclinometer, for monitoring, would provide warning time for some types of bluff failure; especially in terms of safety, this would be a positive impact.

Impacts on Floodplains

Under this alternative, no development is proposed in the 100-year floodplain; thus, no impacts on floodplains would occur.

Impacts on Federal and State Rare, Threatened, and Endangered Species

There would be no impacts on federal or state-listed rare, threatened, or endangered species under this alternative.

Impacts on Other Vegetation, Fish, and Wildlife

At Melrose, no new construction would occur on the grounds, except to provide access for people with disabilities. The extent of this construction cannot be determined without further study; however, this construction would cause minimal disturbance of vegetative communities.

At the William Johnson complex, about 200 square feet of lawn or previously paved areas would be used to provide walkways to the house. The proposed 900-square-foot parking lot behind the McCallum house would primarily displace mowed lawn. Thus impacts at this site would be minimal.

At Fort Rosalie there would be minimal impacts from parking and the promenade on Green Street because they would be built on existing disturbed area (the street).

Increased visitation might cause additional minor disturbance to wildlife species throughout the park.

COMPLIANCE WITH FEDERAL AND STATE LAWS, EXECUTIVE ORDERS, AND REGULATIONS

In implementing the Natchez National Historical Park general management plan, the National Park Service would comply with all applicable laws and executive orders, including those listed below. Informal consultation with appropriate federal, state and local agencies has been conducted in the preparation of this document. The draft environmental impact statement for the general management plan will be was on public review for 60 days. A final environmental impact statement (or abbreviated final environmental impact statement if comments are not substantive) will be prepared that responds to or incorporates the public comments on the draft document. This abbreviated final environmental impact statement reflects changes that were made in response to public comments. Letters received and responses to the letters are included in this final environmental impact statement. After a 30-day no-action period, a record of decision will be prepared and circulated to interested parties, thus completing the National Environmental Policy Act process. The procedures to be followed are described as follows.

NATURAL RESOURCE COMPLIANCE

Clean Air Act, as amended (42 USC 7401 et seq.) — Natchez National Historical Park is designated as a class II clean air area. Maximum allowable increases of sulfur dioxide, particulate matter, and nitrogen oxides beyond baseline concentrations established for class II areas cannot be exceeded. These class II increments would allow modest industrial activities in the vicinity of the park. Section 118 of the Clean Air Act requires all federal facilities to comply with existing federal, state, and local air pollution control laws and regulations. Natchez National Historical

Park would work with the Mississippi Department of Environmental Quality, Office of Pollution Control, to ensure that all in-park activities meet the requirements of the state air quality implementation plan.

Endangered Species Act of 1973, as amended (16 USC 1531 et seq.) —

Section 7 of the Endangered Species Act requires all federal agencies to consult with the U.S. Fish and Wildlife Service to ensure that any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of listed species or critical habitat. Consultation with the Fish and Wildlife Service has revealed that there are no known federally listed threatened or endangered species in the park (see appendix I). Thus, none of the alternatives identified in this general management plan would jeopardize any listed species or critical habitat. Further consultation would be carried out before construction to ensure that no new listed species have been found on any of the sites.

Executive Order 11988, "Floodplain Management" —

This order requires all federal agencies to avoid building in the 100-year floodplain unless no other practical alternative exists. Under alternatives 2 and 3, a trail and boardwalk (respectively) might be built in the 100-year floodplain adjacent to the Mississippi River. According to NPS guidelines, these actions are excepted from compliance with Executive Order 11988.

Executive Order 11990, "Protection of Wetlands" —

This order requires all federal agencies to avoid, where possible, impacts on wetlands. No known wetlands would be affected by

TABLE 6: GENERAL MANAGEMENT PLAN ACTIONS AND CULTURAL COMPLIANCE REQUIREMENTS (CONT.)

ACTIONS	COMPLIANCE REQUIREMENTS
<u>Melrose Estate (cont.)</u>	
Restore main house, dairy, kitchen, and selected portions of the grounds	Requires further SHPO/ACHP review
Restore exteriors of smokehouse, privy, and cisterns	Requires further SHPO/ACHP review
Rehabilitate carriage house for use as a visitor contact station and restore exterior	Requires further SHPO/ACHP review
Preserve stable exterior and rehabilitate interior	Requires further SHPO/ACHP review
Remove nonhistoric gazebo	Requires further SHPO/ACHP review
Restore exterior and interior of south slave cabin; continue present use of north slave cabin with partial restoration of exterior	Requires further SHPO/ACHP review
Construct new segment of staff access road from maintenance complex to Melrose-Montebello Parkway	Requires further SHPO/ACHP review
Remove existing greenhouse and preserve maintenance building and greenhouse	Requires further SHPO/ACHP review
Construct new maintenance complex and pave maintenance yard	Requires further SHPO/ACHP review
Realign entrance road	Requires further SHPO/ACHP review
Reconfigure parking area in existing location and pave	Requires further SHPO/ACHP review
Remove parking area adjacent to main house	Requires further SHPO/ACHP review
Upgrade existing pedestrian walkways	Programmatic exclusion (f)
Construct new pedestrian walkways	Requires further SHPO/ACHP review
Modify structures to allow access for visitors with disabilities	Requires further SHPO/ACHP review
Fence north boundary	Requires further SHPO/ACHP review
Landscape site	Requires further SHPO/ACHP review

ENVIRONMENTAL CONSEQUENCES

TABLE 6: GENERAL MANAGEMENT PLAN ACTIONS AND CULTURAL COMPLIANCE REQUIREMENTS (CONT.)

ACTIONS	COMPLIANCE REQUIREMENTS
<u>Melrose Estate (cont.)</u>	
Construct new segment of staff access road from maintenance complex to Melrose-Montebello Parkway	Requires further SHPO/ACHP review
Remove existing greenhouse and preserve maintenance building and greenhouse	Requires further SHPO/ACHP review
Construct new maintenance complex and pave maintenance yard	Requires further SHPO/ACHP review
Realign entrance road	Requires further SHPO/ACHP review
Reconfigure parking area in existing location and pave	Requires further SHPO/ACHP review
Upgrade existing pedestrian walkways	Programmatic exclusion (f)
Construct new pedestrian walkways	Requires further SHPO/ACHP review
Modify structures to allow access for those with disabilities	Requires further SHPO/ACHP review
Remove parking area adjacent to main house	Requires further SHPO/ACHP review
Fence north boundary	Requires further SHPO/ACHP review
<u>William Johnson House</u>	
Same as alternative 2.	
<u>Fort Rosalie</u>	
Install boardwalk along Mississippi, with appropriate benches and lighting; remove existing roadway	Requires further SHPO/ACHP review
Otherwise, same as alternative 2.	

CONSULTATION AND COORDINATION

PRELIMINARY SCOPING/ PUBLIC INVOLVEMENT

Phase I

Efforts to keep the community informed by way of articles in the local newspaper (*The Natchez Democrat*) and meetings between the superintendent and local representatives have been ongoing since the arrival of the superintendent on site in January 1990. These efforts will continue.

Phase II

During the week of June 25, 1990 presentations describing the NPS planning process and the intent of Natchez National Historical Park were given to the general public, as well as to a number of special interest groups. These groups included officials from the city, black religious and business leaders, the Mississippi Department of Archives and History, Adams County Board of Supervisors, the Chamber of Commerce, the Main Street Partnership Program, the Natchez National Historical Park Foundation, and the Historic Natchez Foundation. Input from attendees was requested, including ideas and concerns regarding a vision of what the park might be, the desired visitor experience, interpretive themes, and other issues. The results of these meetings were publicized and distributed to those on the mailing list.

Phase III

During the week of February 4, 1991, planning alternatives were presented to state and local officials and special interest groups at six different meetings. Resulting comments contributed to minor changes or refinement of the alternatives. In general, the alternatives were well received.

Phase IV

On May 13 and 14, 1991, two meetings were held in Natchez with the general public and with members of the black community to present the status of the black history study and the proposals for interpretation. The progress to date in both areas was well received, although concern was expressed about the approach, accuracy, sensitivity, and direction of the interpretation program regarding the subject of slavery.

Phase V

Initial scoping for this general management plan identified the need for an environmental assessment of the alternatives to be completed as part of the planning process. Subsequent policy decisions dictated the need for an environmental impact statement to be completed instead of an environmental assessment. A notice of intent to prepare an environmental impact statement was printed in the *Federal Register* on June 20, 1991.

The is draft general management plan is being distributed and made available to the public, and a notice of availability was printed in the *Federal Register* on May 3, 1993. comments are being requested. Public comments are reflected in the final environmental impact statement. Comments will be assessed and incorporated into the final general management plan, as appropriate. After a 30-day comment period, a record of decision will be written.

Contact with local, state, and federal government agencies, special interest groups, interested persons, and other

members of the public has been conducted on formal and informal bases by various members of the planning team throughout the planning process, as necessary to gather information.

AGENCIES, ORGANIZATIONS, AND INDIVIDUALS CONTACTED DURING SCOPING

During the course of the planning effort for Natchez National Historical Park, the following agencies, organizations, and individuals were contacted:

Federal Agencies

Fish and Wildlife Service, U.S.
Department of the Interior
Curtis B. James, Environmental
Coordinator, Mississippi Field Office
Mr. David W. Fruge, Field Supervisor,
Louisiana Field Office

Soil Conservation Service, U.S.
Department of Agriculture
Natchez Field Office, Brian D. Stringer,
District Conservationist
Vidalia Field Office, Jerol W. Magoun,
District Conservationist

State Agencies

Louisiana Department of Environmental
Quality, Office of Air Quality and
Radiation Protection
Louisiana Natural Heritage Program,
Department of Wildlife and Parks, Gary
Lester, Coordinator
Louisiana Office of Cultural Development
Mississippi Department of Archives and
History*
Mississippi Department of Economics and
Community Development
Mississippi Department of Environmental
Quality, Office of Pollution Control

Mississippi Natural Heritage Program,
Kenneth L. Gordon, Coordinator

Local Agencies and Organizations

Adams County Board of Supervisors
Historic Natchez Foundation
Main Street Partnership Program
Natchez-Adams County Chamber of
Commerce
Natchez Mayor, David Armstrong
Natchez National Historical Park
Foundation
Natchez Tourism Council

Individuals

Charles Bartley
Mary Lee Davis Toles, Natchez
George Dunkley, Natchez
Ora Frazier, Natchez
Dr. J. R. Todd, Jr., Natchez
Theodore West, Alderman, Natchez
Thelma Williams, Natchez

LIST OF AGENCIES, ORGANIZATIONS, AND INDIVIDUALS TO WHOM COPIES OF THE DRAFT FINAL IMPACT STATEMENT ARE BEING SENT

Federal Agencies

Advisory Council on Historic Preservation
Environmental Protection Agency *
Fish and Wildlife Service, Mississippi
Field Office *
National Park Service, Natchez Trace
Parkway
St. Catherine's Creek National Wildlife
Refuge
Soil Conservation Service, Natchez Field
Office
U.S. Army Corps of Engineers,
Waterways Experiment Station,
Vicksburg, MS *

ENVIRONMENTAL CONSEQUENCES

**LIST OF AGENCIES, ORGANIZATIONS,
AND INDIVIDUALS TO WHOM COPIES
OF THE DRAFT FINAL IMPACT
STATEMENT ARE BEING SENT (cont.)**

Federal Agencies (cont.)

U.S. Army Corps of Engineers, Vicksburg
District, Vicksburg, MS *
Veterans Administration

State Agencies

Mississippi Department of Archives and
History *
Mississippi Department of Economic and
Community Development
Mississippi Department of Wildlife and
Parks, Natural Heritage Program

* This agency/group/individual
commented on the draft plan.

**Federal, State, County, and Local
Officials**

Adams County Board of Supervisors
Governor Kirk Fordice
Natchez Mayor Larry L. "Butch" Brown
Representative Jamie Whitten
Representative Mike Parker
Senator Thad Cochran
Senator Trent Lott
Vidalia Mayor Hiram Copeland

Organizations and Local Agencies

Historic Natchez Foundation
Natchez-Adams County Chamber of
Commerce
Natchez-Adams County Economic
Development Authority
Natchez Convention and Visitor Bureau
Natchez Historical Society
Natchez National Historical Park Advisory
Commission *
Natchez Pilgrimage Tours

APPENDIX E: RANGE OF ESTIMATED COSTS FOR NATCHEZ NATIONAL HISTORICAL PARK

TABLE E-1. FACILITIES DEVELOPMENT AND STAFFING COSTS

	Alternative 1	Alternative 2	Alternative 3
Melrose			
Gross construction			
Restore main house		\$2,225,000	\$2,225,000
Restore kitchen		318,000	318,000
Restore dairy		318,000	318,000
Restore smokehouse		42,000	42,000
Restore privy		42,000	42,000
Restore cisterns		13,000	13,000
Restore north slave cabin		160,000	160,000
Restore south slave cabin		174,000	174,000
Restore slave privy		34,000	34,000
Restore some of the grounds		49,000	49,000
Restore carriage house (exterior)		169,000	169,000
Rehabilitate carriage house (interior)	\$135,000	135,000	135,000
Rehabilitate stable		215,000	215,000
Demolish old maintenance building greenhouse		13,000	13,000
Demolish ticket booth	1,000	1,000	1,000
Demolish gazebo and bridge	26,000	26,000	26,000
Construct maintenance building		527,000	527,000
Construct vehicle shed		52,000	52,000
Construct paved maintenance yard		26,000	26,000
Construct staff parking		16,000	16,000
Install north boundary fence	74,000	74,000	74,000
Install maintenance yard fence		14,000	14,000
Realign part of entrance road		68,000	68,000
Construct new service road		85,000	85,000
Construct new parking area		94,000	94,000
Resurface other existing roads		304,000	304,000
Construct new walkways	8,000	59,000	59,000
Remove current staff parking		13,000	13,000
Construct stabilized turf connector road		14,000	14,000
Construct visitor contact station			<u>\$259,000</u>
Subtotal gross construction	\$244,000	\$5,280,000	\$5,539,000
Advanced project planning	\$46,000	\$1,008,000	\$1,057,000
Interpretation	<u>\$760,000</u>	<u>\$1,446,000</u>	<u>\$1,320,000</u>
TOTAL	\$ 1,050,000	\$7,734,000	\$7,916,000
William Johnson Complex			
Gross construction			
Rehabilitate first floor of William Johnson house	\$477,000		
Rehabilitate first and restore second floor of William Johnson house		\$954,000	\$954,000
Stabilize second and third floors of William Johnson house	348,000		
Stabilize third floor of William Johnson house		158,000	158,000
Rehabilitate first floor of McCallum house	361,000		
Rehabilitate first and second floors of McCallum house		721,000	721,000
Stabilize second and third floors of McCallum house	361,000		
Stabilize third floor of McCallum house		180,000	180,000
Rehabilitate first floor of dependency	196,000		
Rehabilitate both floors of dependency		392,000	392,000
Construct brick walkways	28,000	28,000	28,000
Landscaping	<u>\$10,000</u>	<u>\$10,000</u>	<u>\$10,000</u>
Subtotal gross construction	\$1,781,000	\$2,443,000	\$2,443,000
Advanced project planning	\$340,000	\$467,000	\$467,000
Interpretation	<u>\$763,000</u>	<u>\$1,329,000</u>	<u>\$1,329,000</u>
TOTAL	\$2,884,000	\$4,239,000	\$4,239,000

COMMENTS AND RESPONSES TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Approximately 200 copies of the *Draft Environmental Impact Statement* were distributed to agencies, organizations, and individuals. A total of six individuals, organizations, and agencies presented written comments. These letters are reproduced in the following pages with the adjacent NPS response.

In addition, a public meeting was held on June 9, 1993, during the public review

period. Two people attended the public meeting. Comments ranged from concern about the archeological resources at Fort Rosalie, to voicing support for alternative 3 because of the possibility of visiting a cotton plantation, to a desire for the National Park Service to work cooperatively with the Natchez Museum of African-American History and Culture.

FEDERAL AGENCIES

COMMENTS



DEPARTMENT OF THE ARMY
LOWER MISSISSIPPI VALLEY DIVISION, CORPS OF ENGINEERS
P. O. BOX 80
VICKSBURG, MISSISSIPPI 39180-0080

REPLY TO
ATTENTION OF:

June 23, 1993

Directorate of Planning
Environmental Analysis Division

Superintendent
Natchez National Historical Park
Post Office Box 1208
Natchez, Mississippi 39121

Dear Sir:

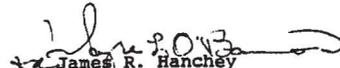
Appropriate staff in the Corps' Lower Mississippi Valley Division and the Vicksburg District offices have reviewed the Draft General Management Plan/EIS. The following comments are provided for your consideration as a result of that review.

33 1
a. It appears that most areas under consideration for construction are located in non-jurisdictional areas and would not be subject to regulation by Federal laws administered by the Corps. However, proposed work at the Melrose and Fort Rosalie sites may impact wetlands or other regulated waters of the United States. Ponds, wetlands, and intermittent streams have been identified on the Melrose site and the Fort Rosalie site extends to the thalweg of the Mississippi River. Proposed work at both of these locations, as well as other areas which might contain wetlands or other waters of the United States, should be reviewed by the Corps for possible regulatory requirements prior to beginning work.

2
b. Activities proposed within the 100-year floodplain are those which are regarded as appropriate.

If you have questions regarding these comments, please contact Dr. Tom Pullen, our point of contact for the Division office.

Sincerely,


James R. Hanchey
Director of Planning

RESPONSES

1. None of the proposed actions would affect wetlands. As indicated on p. 123 of the draft plan, consultation with the U.S. Fish and Wildlife Service indicates that there are no significant wetlands in the park. However, we will consult as appropriate.
2. Noted.

COMMENTS



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
WATERWAYS EXPERIMENT STATION, CORPS OF ENGINEERS
3809 HALLS FERRY ROAD
VICKSBURG, MISSISSIPPI 39180-9188

Maureen K. Corcoran

June 25, 1993

Ms. Deb Liggett, Interim Superintendent
Natchez National Historical Park
P. O. Box 1208
Natchez, MS 39121

Dear Ms. Liggett:

I have recently reviewed the draft plan for the Natchez National Historical Park. I am very interested in the development of this plan as both a geologist for the Waterways Experiment Station and as a resident of Natchez. The research you conducted was very thorough and well-presented.

1 I believe that Alternative 3 would benefit both Natchez and the park service. Tourism is the largest industry Natchez has and I feel that this alternative plan would capitalize on this industry. Although Natchez has much to offer, many tourists are only aware of the antebellum homes. Tours are now being conducted to include the Victorian style houses (1880's and 1890's). Many of these houses are located in the first established subdivision of the Natchez known as Clifton Heights (Linton and Clifton Avenues). In Alternative 3, there is mention of community sponsored events such as Christmas decorating tours. A tour of the Victorian houses during the Christmas season instead of in June would attract more people. Natchez is an active community for its size and I'm sure its citizens would welcome any involvement from the park service.

2 The oil industry has also played a major role in the economical and community development of Natchez. I believe Alternative 3 could include an exhibit on the oil industry from the beginning of exploration to modern times.

3 Alternative 3 also mentions acquiring a plantation. Tacony Plantation in Concordia Parish, Louisiana, is the only remaining brick antebellum working plantation. Although the house is located in Louisiana, it has many ties to Natchez. Over 81% of Concordia Parish was owned by Natchez planters living in Adams County. The plantation was built in 1850 by Alfred Vidal Davis, Sr., the owner of Dunleith before the Civil War. This plantation was one of the top ten cotton producing plantations in Louisiana before the Civil War. John R. Lynch, Mississippi's first black U.S. representative and Speaker of the House, was born a slave here in 1847.

HYDRAULICS
LABORATORY

GEOTECHNICAL
LABORATORY

STRUCTURES
LABORATORY

ENVIRONMENTAL
LABORATORY

COASTAL ENGINEERING
RESEARCH CENTER

INFORMATION
TECHNOLOGY LABORATORY

RESPONSES

1. Alternative 2 fulfills the legislative intent for community involvement. Your ideas on community-sponsored events will be considered as funding and staffing are available.
2. Interpretation of the oil industry is identified under interpretive theme 5 on p. 28 and would be included as part of alternative 2.
3. Noted. Also, alternative 2 (the preferred alternative) fulfills the legislative intent of the park. As described on page 60, interpretation of the role of the cotton plantation in Natchez history would be an integral part of the interpretive media and personal services at the visitor center, Melrose, and the William Johnson complex.

However, to explore this issue more fully, the National Park Service will seek funding for a special resource study of regional plantations associated with Natchez to determine the best examples according to national historic landmark criteria and new area criteria. The purpose of this study would be to determine the suitability and feasibility of either entering into a cooperative agreement or other appropriate arrangement with the owner to incorporate the site's preservation, interpretation, and visitor use into the interpretive and management program of Natchez National Historical Park or to seek legislation to add the site to the park.

COMMENTS

RESPONSES

Again, I would like to compliment you on a through investigation. If I can be of any service, please don't hesitate to call.

Sincerely,

Maureen K. Corcoran
Maureen K. Corcoran
Research Geologist
Earthquake, Engineering, and
Geosciences Division



U.S. Army Corps of Engineers
Waterways Experiment Station

MAUREEN K. CORCORAN

Research Geologist

Earthquake Engineering & Geosciences Division

OFFICE (601) 634-5354 3808 HALLS FERRY ROAD
FAX (601) 634-5153 VICKSBURG, MS. 39180-6189

COMMENTS

RESPONSES



United States Department of the Interior
FISH AND WILDLIFE SERVICE

900 Clay Street, Room 235
Vicksburg, Mississippi 39180
June 9, 1993

Mr. Don R. Thompson
Acting Superintendent
National Park Service
Natchez National Historical Park
Post Office Box 1208
Natchez, Mississippi 39121

Dear Mr. Thompson:

Thank you for your letter of April 21, 1993, concerning the GMP/EIS for Natchez National Historical Park. Our comments are provided in accordance with the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

None of the alternatives would result in significant adverse impacts to fish and wildlife resources. Overall, the Fish and Wildlife Service would recommend implementation of Alternative 2.

Sincerely,

Curtis B. James
Environmental Coordinator

CBJ/ds

COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUN 14 1993

Mr. Don R. Thompson, Acting Superintendent
Natchez National Historical Park
Box 1208
Natchez, Mississippi 39121

RE: Draft General Management Plan, Draft Development Concept
Plan, and Draft Environmental Impact Statement (EIS) of the
Natchez National Historical Park

Dear Mr. Thompson:

The Environmental Protection Agency Region IV (EPA) has reviewed the referenced Draft EIS. This review was conducted in accordance with EPA's responsibilities under Section 309 of the Clean Air Act and Section 102 (2)(C) of NEPA. The Draft EIS analyzes three alternatives to management of the historical and cultural resources located in the Natchez region.

We enjoyed reviewing this document because the actions were clearly described in an attractive and inviting format that was easy to follow. The graphics were particularly well done and added clarity to the presentation. The following comments concerning the impacts of the proposed alternative are provided below.

1 Erosion Control at Fort Rosalie.

As discussed in the "Affected Environment" section, bluff erosion at Fort Rosalie was identified as causing of loss of life and damage to historic buildings following a mudslide that struck Natchez Under-the-Hill in March, 1980. (Natchez Under-the-Hill is a small historic settlement situated at the edge of the Mississippi River at the base of the bluff system.) This episode was identified in the Draft EIS as being caused by rainfall, ground water seepage, and erosion caused by leaky utilities. Although bluff erosion protection was identified as being the most significant environmental action requiring immediate attention, specific plans detailing bluff stabilization were lamentably lacking. References to "generic bluff stabilization measures" (page 40 and elsewhere) were vague and would be considerably enhanced by including more specific details.

RESPONSES

1. Bluff stabilization actions at Fort Rosalie will not be taken by the National Park Service until further study is done to determine the site-specific actions needed. These studies cannot be accomplished until the land is in federal ownership (which it currently is not). An environmental document, which would be tiered to this environmental impact statement, will accompany any action plan developed for the site.

Recent consultation with geologists at the Waterways Experiment Station in Vicksburg, Mississippi, indicates that probable bluff stabilization activities at the site would not include moving large amounts of earth. They believe that major realignment of the slope is not necessary. Instead, stabilization activities would focus on repairing damaged utility lines, controlling stormwater runoff, and performing vegetation management activities such as removing large trees from the top of the bluff because the weight of the trees and the roots weaken the loess soil.

In addition, the city recently initiated a bluff stabilization study on a site close to Ft. Rosalie. Review of this study and consultation with the investigators will be undertaken as part of any NPS study or action plan.

COMMENTS

RESPONSES

It was suggested (page 88 and elsewhere) that the bluffs be protected by "changing the bluff angle", which we interpret to mean altering the topography of the bluffs to achieve a reduced angle of repose and creating a more stable bluff system which can better resist man-induced and natural wear. Altering the topography of the bluffs would surely require moving considerable amounts of earth, and the Draft EIS should examine the impacts of both heavy earth moving equipment having access to, and operation upon, the fragile bluff system. Would reconfiguration of the bluffs require additional fill, or would the existing earth be rearranged to achieve a more stable slope?

Erosion of the bluffs was also attributed to leaking utilities that were found to be in a state of disrepair, uncontrolled storm water runoff, and large tree roots creating instability at the top of the bluff. As the first two items are having detrimental impacts affecting the quality of the environment, the Draft EIS should focus upon specific remedies that will improve these unacceptable conditions. In the absence of clarification, we assume what is leaking and saturating the soil is domestic sewage. The document should identify which components of the utilities system needs repair, and explain how these repairs will be affected within the scope of the overall renovation. Also, the Draft EIS should identify some means to contain and direct stormwater runoff, make estimates of anticipated stormwater volume, provide options for disposal, and demonstrate how the proposed stormwater runoff control plan will integrate with the State of Mississippi NPDES Program.

Waste Reduction

The project should be examined to determine where pollution prevention opportunities might be identified. Coordinated efforts to develop waste disposal options and source reduction measures could reduce the amount of waste generated at the site.

The final EIS and Management Plan, as well as Park visitor brochures, might be printed on recyclable paper stock rather than clay-filled paper stock that was used in printing the Draft EIS.

Reduce Cooling Loads to Park Buildings

Shade is an important means to reduce the need for electric power used in air conditioning. In addition to planting native shade trees to shade pedestrian paths and parking areas, we would encourage planting shade trees adjacent to the visitor buildings and other facilities. Reducing heat load to buildings is cost-effective and is a form of pollution prevention.

We rate the environmental impact of this action as EC-2, (Environmental Concerns) because the Draft EIS does not contain sufficient information to fully assess environmental impacts of the proposed bluff stabilization. In order to fully protect the environment, certain environmental impacts must be avoided, and to determine these impacts, we suggest the inclusion of the additional information noted above.

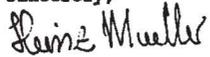
2. The project will be examined in the design stage for pollution prevention opportunities.
3. The draft plan was printed on recycled/recyclable paper that meets the Joint Committee on Printing requirements. The revision package for the final plan and the final *Interpretive Prospectus* is also printed on recycled/recyclable paper.
4. Planting native shade trees adjacent to visitor buildings will be considered during the development of the site plans for these facilities.

COMMENTS

RESPONSES

We appreciate the opportunity to review this proposed action.
Please call me or John Hamilton at (404) 347-3776 if additional
information is needed.

Sincerely,



Heinz J. Mueller, Chief
Environmental Policy Section

STATE AND LOCAL AGENCIES

COMMENTS



Mississippi Department of Archives and History

Post Office Box 571 • Jackson, Mississippi 39205-0571 • Telephone 601-359-6850
Elbert R. Hilliard, Director

June 30, 1993

Ms. Deb Liggett
Acting Superintendent
Natchez National Historical Park
P. O. Box 1208
Natchez, Mississippi 39121

Dear Ms. Liggett:

I am writing in response to Don Thompson's recent letter seeking our comments on the draft of the Natchez National Historical Park General Management Plan and Environmental Impact Statement. Overall we feel that the plan is good and that it represents excellent work on the part of the planning team. However, we do have a few areas of concern.

First, is the matter of the log cabin on the Fort Rosalie site. Although Alternatives 2 and 3 could possibly permit retention of the log cabin, maps for both alternatives indicate removal. Our office strongly disagrees with this plan and would like to reiterate our recommendation for the building made in July of 1991 as part of comments on the "Interim Land Protection Plan":

Recommendation: This log cabin is the sole surviving structure from an ambitious "reconstruction" of Fort Rosalie that was undertaken by entrepreneur Jefferson Davis Dickson just prior to World War II. Now over fifty years old, this building is a locally important landmark and is associated with the beginning of tourism as a major industry in Natchez. The building should be preserved on site as it has a historical relationship to the Fort Rosalie site. Fortunately, the cabin is located at the northern limit of the Fort Rosalie site and should not intrude on the National Park Service's interpretation of the seventeenth-century fort site.

For what it would cost to remove the building from the site, it could probably be stabilized and used for National Park Service equipment storage, etc. Because the log cabin is the last remaining structure from a significant (although misguided) earlier attempt to interpret Fort Rosalie and because of local sentiment for the structure, we believe it would be inappropriate historically and inexpedient politically to remove the log building from the Fort Rosalie Site.

Board of Trustees: William F. Winter, president / Van R. Burnham, Jr. / Arch Dalrymple III / Lynn Crosby Cammill
Gilbert R. Mason, Sr. / Amalie Fair Robinson / Everette Truly / Rosemary Taylor Williams / Sherwood W. Wise

RESPONSES

1. The significance determination of the Fort Rosalie site made pursuant to the establishing legislation was based on the site's relationship to colonial history and the early (founding) history of Natchez. Retention of past attempts at site interpretation (recognized as inaccurate) would be intrusive and confusing to the public's understanding of the site. For these reasons the National Park Service proposes removal of the log cabin.

COMMENTS

RESPONSES

Ms. Deb Liggett
June 30, 1993
Page two

2

For other buildings to be removed from the Fort Rosalie Site, we request that, in the early planning stages, NPS coordinate proposed actions with our office, pursuant to Federal Agency responsibilities under Sections 106 and 110 of the National Historic Preservation Act, as amended. As outlined in our July 1991 comments on the "Interim Land Protection Plan," we would like for NPS to work with our office and local preservation organizations in relocating those buildings possessing local architectural significance to appropriate sites within the city.

3

The next issue is in regard to the Cotton Plantation Complex. We wholeheartedly agree that "Plantation slavery and cotton production are important keys to understanding the antebellum story of Natchez . . ." (page 60)--too much so to leave its interpretation just to interpretive media at the visitor center and periodically scheduled tours of a cotton plantation. Because this aspect of Natchez history is so important, we strongly suggest that the course of action delineated in Alternative 3 be adopted for interpretation of a cotton plantation. Without the Cotton Plantation experience, there will be a great hole in the interpretive efforts and message of the Natchez National Historical Park. It is one thing to see an exhibit about a cotton plantation; it is quite another to actually experience a plantation.

4

The Department of Archives and History endorses inclusion of our archaeological park, Grand Village of the Natchez Indians, within the boundaries of the Natchez National Historical Park Preservation District. We will gladly cooperate with the National Park Service to ensure that the very important story of Native Americans in the Natchez area is properly interpreted to the public.

Again, I want to compliment the National Park Service on the preparation and beautiful presentation of the draft General Management Plan and appreciate the opportunity to comment on it at this stage of its development. If we can provide additional information, please do not hesitate to contact us.

Sincerely,



Elbert R. Hilliard
State Historic Preservation Officer

ERH/gj

cc: Mr. Roger Walker

2.

As indicated on p. 56, the National Park Service will coordinate with the state historic preservation officer on this issue.

3.

Alternative 2 (the preferred alternative) fulfills the legislative intent of the park. As described on page 60, interpretation of the role of the cotton plantation in Natchez history would be an integral part of the interpretive media and personal services at the visitor center, Melrose, and the William Johnson complex.

However, to explore this issue more fully, the National Park Service will seek funding for a special resource study of regional plantations associated with Natchez to determine the best examples according to national historic landmark criteria and new area criteria. The purpose of this study would be to determine the suitability and feasibility of either entering into a cooperative agreement or other appropriate arrangement with the owner to incorporate the site's preservation, interpretation, and visitor use into the interpretive and management program of Natchez National Historical Park or to seek legislation to add the site to the park.

4.

Noted.

ORGANIZATIONS

COMMENTS

1827 Teakwood Drive
Jackson, Mississippi 39212
June 28, 1993

Ms. Deb Liggett
Acting Superintendent
Natchez National Historical Park
P. O. Box 1208
Natchez, Mississippi 39121

Dear Ms. Liggett:

I am writing on behalf of the Natchez National Historical Park Advisory Commission regarding public comments on the Park's draft General Management Plan/Environmental Impact Statement (GMP/EIS) that was recently released. The Commission wishes to complement the National Park Service on the preparation of the plan. It is a beautifully illustrated, attractively designed, and carefully studied report.

Although the Commission is in agreement with most of GMP/EIS recommendations, there are some items we feel should be added or revised. These are itemized as follows:

I. Preservation District: We believe there should be a greater emphasis within the GMP/EIS to clarify that the area encompassed within the Preservation District boundaries actually is the Park, not merely a "zone of influence." Public Law 100-479, Section 2(b) states, "The park shall consist of the historic districts established under this Act and the following properties: [Melrose and Fort Rosalie]." Of course, Public Law 101-399 later provided for the acquisition of the William Johnson House complex.

Perhaps this emphasis could be partially accomplished by identifying in both the text and map legends the properties held in fee simple ownership by the National Park Service as "NPS-owned properties" rather than "NPS properties." Additionally, the maps (particularly the one on page 11 that illustrates the Preservation District and the National Register Historic Districts) should clearly communicate that the Preservation District constitutes the Park's boundary.

On page 10, the GMP/EIS very clearly and correctly states that in creating this unit of the National Park System, Congress desired, "...a park that actively reaches out to the community to effectively tell the story of all the peoples of Natchez, and a park that actively works to preserve Natchez' resources for future generations." However, only a few paragraphs later, the statement that "NPS assistance would be provided only in response to specific requests from the community" reduces the active role of the National Park Service to one of passive reaction. We find this not only contradictory within the GMP/EIS but contrary to our understanding of the intent of Public Law 100-479.

The National Park Service has a very important pro-active role to play in Natchez, not only in the restoration/preservation/interpretation of NPS-owned properties, but also in assisting, even leading, efforts to preserve and interpret the city's rich historic resources. As presently written the GMP/EIS does not adequately describe or emphasize the pro-active role for the National Park Service within the community.

RESPONSES

1. The text has been revised to emphasize the preservation district as the park and to better describe the cooperative role of the National Park Service within the community. See pages 3-4, 10, and 45.

The National Park Service is committed to the cooperative nature of the park. As indicated on page 10, however, the National Park Service has no regulatory or management control over property within the preservation district, other than at the sites it owns and those properties whose owners choose to enter into a cooperative agreement.

COMMENTS

Ms. Deb Liggett
June 28, 1993
Page Two

2 II. Cotton Plantation: The cotton plantation is central to understanding the history, development, and importance of Natchez. In fact, the story of Natchez is primarily that of the cotton plantation -- its rise, its operation, its wealth, and its decline. The two are inseparably intertwined.

Therefore, the Commission emphatically recommends that the proposals for the cotton plantation's interpretation outlined in Alternative 3 be incorporated into whichever plan alternative is eventually adopted. Obviously an interpretive museum exhibit in New York, or Alaska, or anywhere else, could impart information about cotton plantations. However, only at the Natchez National Historical Park does the National Park Service have the opportunity and the mandate to provide the plantation experience that is central to understanding the history of the peoples of Natchez and its surrounding area. Failure to take advantage of this opportunity would be a tragedy.

3 45 III. Log Cabin at Fort Rosalie Site: The log cabin situated at the intersection of South Canal Street and D.A. Biglane Street is the last extant remnant of a circa 1940 interpretation of Fort Rosalie undertaken by Jefferson Davis Dixon, an internationally recognized promoter and a native son of Natchez. Because the log cabin is the only remaining tangible evidence of the community's earlier efforts to recognize and interpret the history of Fort Rosalie and because the building physically embodies Natchez' early promotion of tourism as a tool for economic development and preservation (e.g. Interpretive Theme #5, page 28), it should be retained and preserved as a component of the Fort Rosalie Site. Although the structure would not have to be preserved on its present site, it should remain within the NPS-owned Fort Rosalie property, since it relates directly to the history and interpretation of the site.

4 IV. Melrose: Great care should be taken not to state or infer a definite period of interpretation for any one of the NPS-owned properties until all management reports and/or special studies have been completed for each project. This is particularly true for Melrose, since significant aspects of its history occurred over long periods of time and issues pertaining to its period of interpretation are complex. We would suggest that statements such as "the kitchen and dairy would be restored and furnished to the antebellum period" (page 49) be made only after all the recommended studies for the property have been completed and evaluated. Statements such as "the main house and selected portions of the grounds at Melrose would be restored to an appropriate period, based on historical, archaeological, and architectural research" (also page 49) would be much better for all components of the site.

5 V. Visitor Center: Although the GMP/EIS for this element leaves flexibility for working with the City of Natchez in developing a joint visitor center, we believe that the City's recent award of a \$3.42 million Intermodal Surface Transportation Efficiency Act (ISTEA) enhancement grant toward development of a \$7.13 million visitor/intermodal transportation center warrants further comment within the GMP/EIS.

6 VI. Alternatives: The minimalist approach to the Park's development/interpretation offered in Alternative #1 is, in our opinion, too meager to

RESPONSES

2. Alternative 2 (the preferred alternative) fulfills the legislative intent of the park. As described on page 60, interpretation of the role of the cotton plantation in Natchez history would be an integral part of the interpretive media and personal services at the visitor center, Melrose, and the William Johnson complex.

However, to explore this issue more fully, the National Park Service will seek funding for a special resource study of regional plantations associated with Natchez to determine the best examples according to national historic landmark criteria and new area criteria. The purpose of this study would be to determine the suitability and feasibility of either entering into a cooperative agreement or other appropriate arrangement with the owner to incorporate the site's preservation, interpretation, and visitor use into the interpretive and management program of Natchez National Historical Park or to seek legislation to add the site to the park.

3. The significance determination of the Fort Rosalie site made pursuant to the establishing legislation was based on the site's relationship to colonial history and the early (founding) history of Natchez. Retention of past attempts at site interpretation (recognized as inaccurate) would be intrusive and confusing to the public's understanding of the site. For these reasons the National Park Service proposes removal of the log cabin.

4. Wording has been changed on p. 49 to appropriately qualify the period of restoration for the kitchen and dairy at Melrose. The National Park Service agrees, as indicated throughout the document, that a time period for interpretation or restoration at any of the NPS-owned sites in the park must wait until the appropriate studies are completed.

5. Update made on p. 30. The National Park Service will continue to work with the city toward a joint visitor center.

6. See response to comment 2. In addition, no costs for a plantation were included in alternative 3 because the cost of a plantation is unknown. This information would need to come from a special resource study.

COMMENTS

Ms. Deb Liggett
June 28, 1993
Page Three

be effective, and well may not even comply with the intent of Public Law 100-479 which created the Park. The primary difference between Alternatives #2 and #3 appears to be how the cotton plantation is interpreted. Because experiencing an actual cotton plantation is so important to understanding the Natchez story and because the estimated cost difference between implementing Alternative #3 is only \$811,00 (or 4.9%) more than the cost of Alternative #2, we believe it would be unwise to omit the plantation experience from the Park's plans. We, therefore, strongly endorse adoption of Alternative #3 as the course of action for the Natchez National Historical Park.

The Commission appreciates the excellent work that has gone into the preparation of the draft GMP/EIS, as well as this opportunity to comment on the draft. We look forward to working with the local and regional National Park Service staff toward fulfillment of the Park's goals and potentials.

Sincerely,



Kenneth H. P'Pool
Chairman
Natchez National Historical Park
Advisory Commission

KHP/lr

cc: Advisory Commission Members

RESPONSES



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

NPS D-4A, January 1994



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