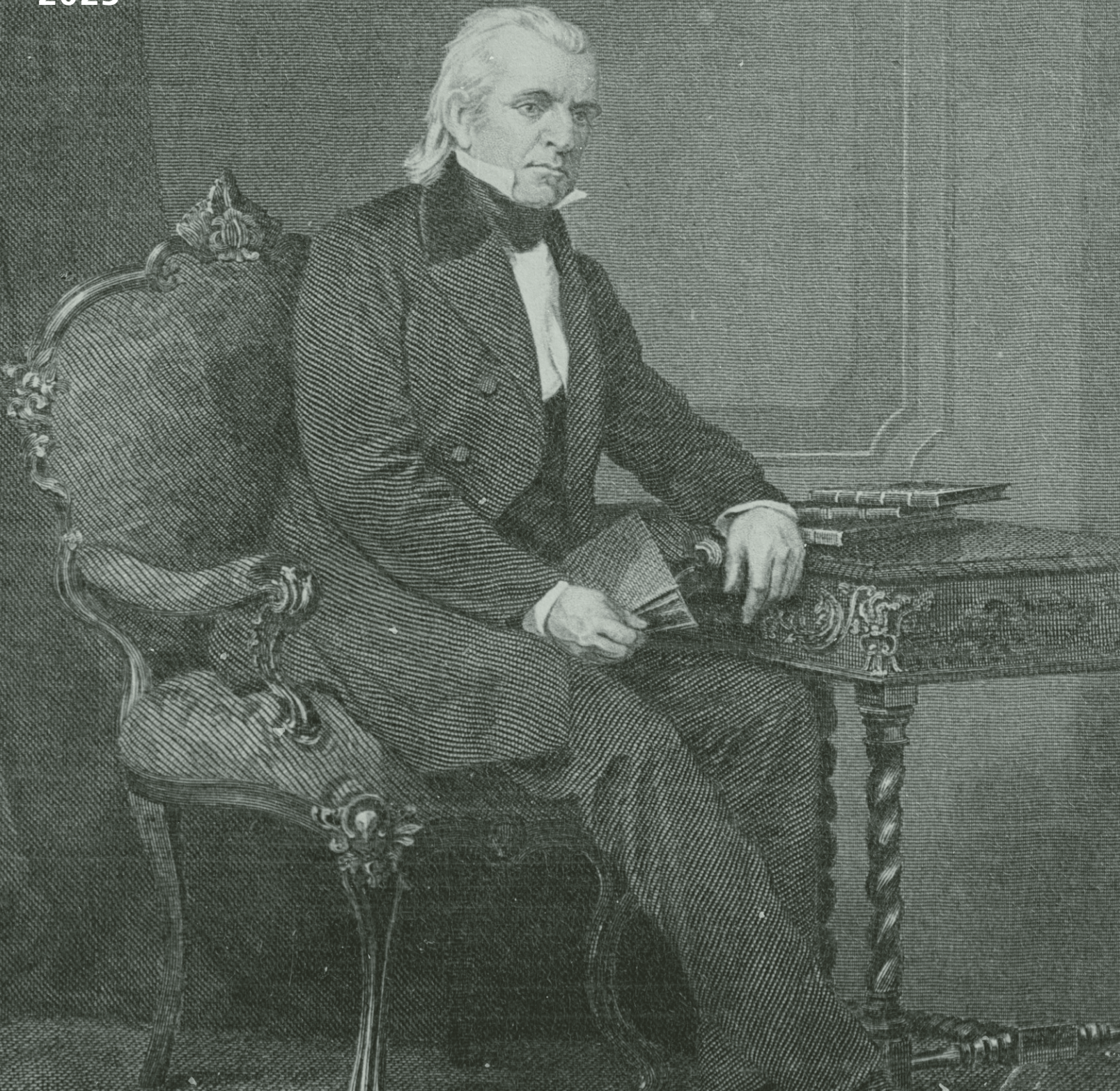




# James K. Polk Presidential Home Special Resource Study

2023



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## EXECUTIVE SUMMARY

### INTRODUCTION

In 2019, Congress directed the Secretary of the Interior through the John D. Dingell Jr. Conservation, Management, and Recreation Act (Public Law 116-9) to conduct a special resource study of the President James K. Polk Home (Polk Home) in Columbia, Tennessee, and adjacent property. The National Park Service (NPS) has prepared this special resource study to evaluate for potential inclusion within the national park system the Polk Home and adjacent property, which includes the Sisters' House, a kitchen outbuilding, gardens and garden cottage, the Polk Presidential Hall, and a modern law office building, all situated on the land parcel once owned by Samuel Polk, James K. Polk's father. As directed by Congress, this special resource study evaluates the site using established criteria for evaluating the national significance, suitability, feasibility, and need for NPS management that must be met for a site to be considered for inclusion in the national park system as a new, independent unit. The legislation further requires that the study process follow 54 USC 100507 and that the Secretary of the Interior submit a report containing the results of the study, along with any recommendations, to the House of Representatives Committee on Natural Resources and the Senate Committee on Energy and Natural Resources. The relevant text of Public Law 116-9 is included in appendix A.

### RESOURCE OVERVIEW

The President James K. Polk Home is a designated National Historic Landmark (NHL) (1961) for its association with the 11th President of the United States, James K. Polk, located in downtown Columbia, Tennessee.

The Polk Home and adjacent property, including the Sisters' House, the kitchen, and the gardens make up the NHL boundary. Samuel Polk, James K. Polk's father, purchased three lots of land and began construction of the home in 1816. James K. Polk lived in his parents' home from 1818 until 1824, during which time he was attending college and beginning his law and political career. While James K. Polk resided in the home briefly, there are no other extant sites associated with his life besides the White House. The Polk Home, Sisters' House, kitchen outbuilding, gardens, and the Polk Presidential Hall are owned and operated by the James K. Polk Memorial Association of Nashville and the State of Tennessee as a museum to President James K. Polk, the US Presidency and American society, and the culture of the Polk period. In addition to the resources at the site, there is a privately owned and operated parcel with a modern building serving as a law office. The inclusion of this parcel in the study allows for a more appropriate configuration of the site if it were to be designated a national park unit.

### SUMMARY OF FINDINGS

National Park Service *Management Policies 2006*, section 1.3, directs that proposed additions to the national park system must meet four legislatively mandated criteria: (1) national significance, (2) suitability, (3) feasibility, and (4) need for direct NPS management. All four of these criteria must be met for a study area to be considered for addition to the national park system. Based on the analysis performed through this special resource study, the National Park Service concludes that the Polk Home and adjacent property do not meet all of the established criteria for new national park system units.

### **Criterion 1 – National Significance**

As a designated National Historic Landmark (1961), the Polk Home possesses cultural resources that are nationally significant. Upon further evaluation, the National Park Service found that the site continues to meet the NHL criteria for national significance. The Sisters' House, the kitchen outbuilding, the gardens and garden cottage, and the Polk Presidential Hall contribute to the interpretation of the Polk Home. The study area, composed of the Polk Home and adjacent property, meets this criterion for inclusion in the national park system.

### **Criterion 2 – Suitability**

The addition of the Polk Home and adjacent property would constitute a substantive addition to the national park system, as there currently is no direct representation of Polk's resources, story, or legacy in the system. The study area is associated with a period of Polk's life that influenced his path to the presidency and is his only surviving residence. The site is suitable as an addition to the national park system based on the character, quality, quantity, and rarity of the resource and for its educational and interpretive potential for the 11th president of the United States. The study area meets this criterion for inclusion in the national park system.

### **Criterion 3 – Feasibility**

The study area meets all of the factors considered under the analysis of feasibility. The area is of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment. Current land ownership patterns, economic and socioeconomic impacts, and potential threats to the resources do not appear to preclude the study area from potentially becoming a new unit of the national park system.

Although, the James K. Polk Memorial Association is more supportive of an affiliated area or partnership model, there appears to be sufficient local support for inclusion of the study area within the national park system and public satisfaction with the current onsite visitor opportunities. The site would not require substantial new infrastructure to support visitation and to meet the standards of a national park system unit. The special resource study concludes that the Polk Home and adjacent property are considered feasible for inclusion in the national park system.

### **Criterion 4 – Need for Direct NPS Management**

The James K. Polk Memorial Association, in partnership with the State of Tennessee, is currently providing adequate resource protection and visitor access to the site to support public enjoyment. Existing management offers guided tours of the Polk Home and adjacent property, hosts rotating exhibits in the Polk Presidential Hall, provides a variety of interpretive programs and events, maintains the historic resources, and stewards an entire museum collection. The site is already eligible to receive NPS technical support through the NHL program. Direct NPS management of the Polk Home and adjacent property could offer sustained resource protection and interpretive offerings; however, given the ongoing and successful work of the James K. Polk Memorial Association, NPS management would not be considered a "clearly superior alternative" and would have limited additional benefit. The level of protection and visitor opportunities provided by the current management entities appears sufficient; therefore, the site does not demonstrate a clear need for direct NPS management. This special resource study concludes that this criterion of need for direct NPS management is not met.

## CONCLUSION

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The Polk Home and adjacent property meet Criterion 1 – National Significance, Criterion 2 – Suitability, and Criterion 3 – Feasibility but do not meet Criterion 4 – Need for Direct NPS Management. Therefore, the special resource study finds that the Polk Home and adjacent property do not meet all four criteria to be eligible for designation as a new unit of the National Park Service.

Being added as a unit to the national park system is only one of many options for managing a site(s), and the National Park Service operates several programs that help others preserve natural, cultural, and recreational areas outside of the park system. Although all of the established criteria have not been met, the National Park Service recognizes the public support and a potential opportunity for enhancing the interpretation and preservation of the James K. Polk Presidential Home. Due to the positive finding for national significance and suitability, the Polk Home is eligible for recognition as an NPS-affiliated area. Affiliated area status has the potential to provide a higher level of NPS support and the possibility of federal funding, depending on the formal agreement(s) developed between the National Park Service, current property owners, and other supporting entities. This agreement(s) would establish a formal partnership between the National Park Service and the nonfederal site manager, ensuring sustained protection and visitor access to the resources within the study area.

## A GUIDE TO THIS DOCUMENT

This special resource study is organized into the following chapters. Each chapter is briefly described below.

**Chapter 1: Study Purpose and Background** provides a brief description of the study area and an overview of the study's purpose, background, and process. This chapter also summarizes the NPS findings on the special resource study.

**Chapter 2: Historic Background and Resource Description** provides a historical overview and site description of the President James K. Polk Home and adjacent property. Construction of the Polk Home began in 1816 by James K. Polk's father, Samuel Polk. James K. Polk lived in his parents' home from 1818 until 1824, during which time he was attending college and beginning his political career, eventually leading to his election as the 11th president of the United States.

**Chapter 3: Analysis of the Four Criteria for Evaluation** describes the evaluation criteria and findings of the special resource study. Criteria discussed include national significance, suitability, feasibility, and need for direct NPS management.

**Chapter 4: Public Outreach** describes public outreach efforts conducted by the National Park Service in connection with the study. This includes a summary of major input that was provided by the public during the initial phases of the study.

**The appendixes** include the legislation authorizing this special resource study, a compilation of public comments received during outreach efforts, references used in the study, and study team.

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## CHAPTER 1: STUDY PURPOSE AND BACKGROUND

Chapter 1 describes the purpose and background of the study, including the criteria used by the National Park Service (NPS) to determine if a resource is eligible for potential designation as a unit of the national park system. The chapter concludes with a brief description of the study methodology and limitations.

### PURPOSE AND NEED

New areas are typically added to the national park system by an Act of Congress. However, before Congress decides to create a new park, reliable information is needed about the resource qualities at the site(s) and alternatives for protection. The National Park Service is often tasked with evaluating potential new park units for compliance with established criteria and documenting the findings in a special resource study.

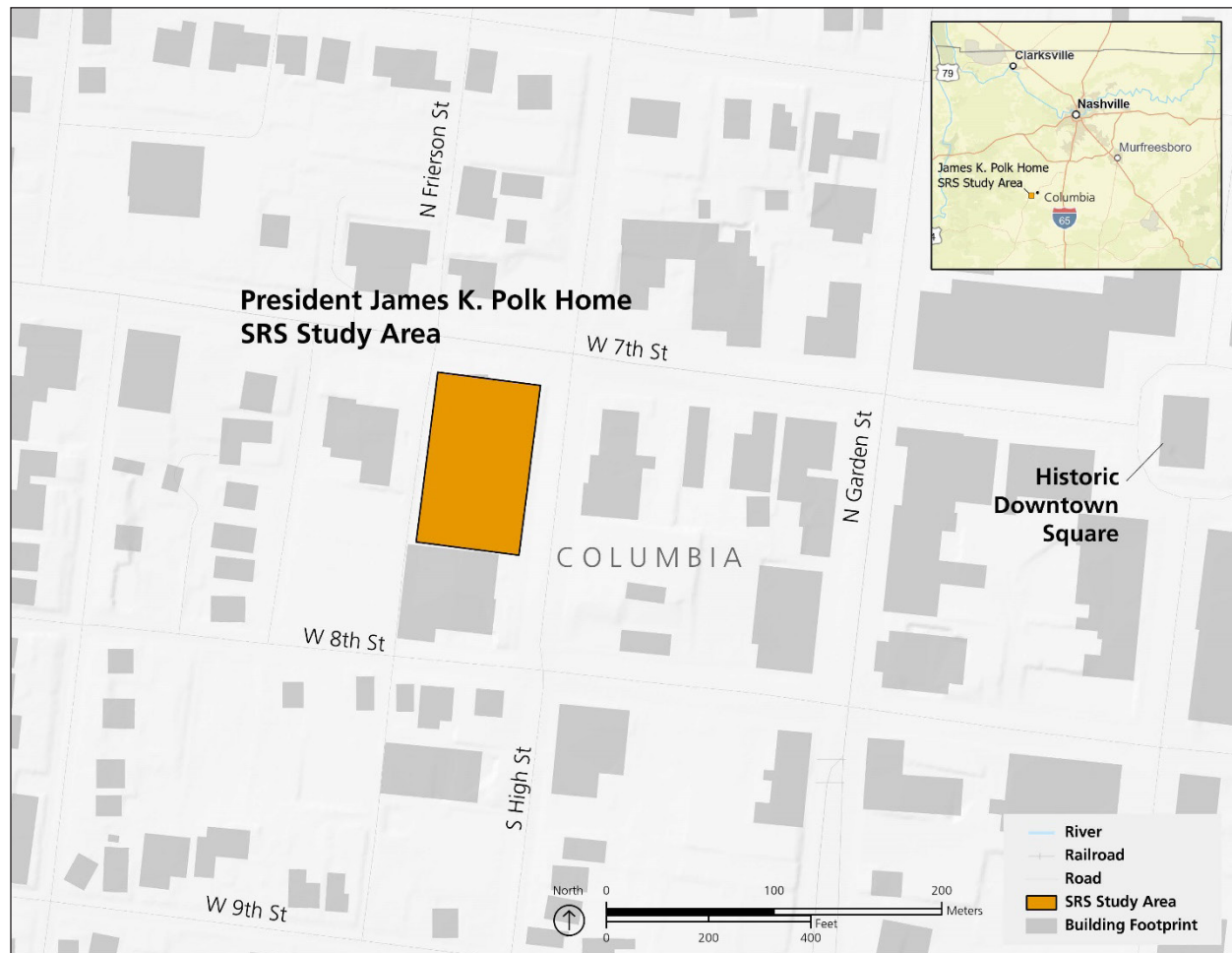
In 2019, Congress directed the Secretary of the Interior, through the John D. Dingell Jr. Conservation, Management, and Recreation Act (Public Law 116-9), to conduct a special resource study of the President James K. Polk Home in Columbia, Tennessee, and adjacent property to determine if the study area would be an appropriate addition to the national park system. The purpose of the special resource study is to evaluate the national significance of the study area and determine the suitability and feasibility of designating the study area as a unit of the national park system. Also considered in the study area were other alternatives for preservation, protection, and interpretation of the study area by federal, state, or local government entities, or private and non-profit organizations.

The legislation further required that the study process follow section 8(c) of Public Law 91-383 [(the National Park System General Authorities Act) (recently codified in 54 USC 100507)] and that the Secretary of the Interior submit the study findings and any recommendations to Congress within three years of the study's funding.

This special resource study evaluates the site and surrounding lands for potential inclusion in the national park system. This study is intended to provide Congress with information about the quality and condition of the President James K. Polk Home in Columbia, Tennessee, and adjacent property, and their relationship to established criteria for NPS parklands.

### OVERVIEW OF THE STUDY AREA

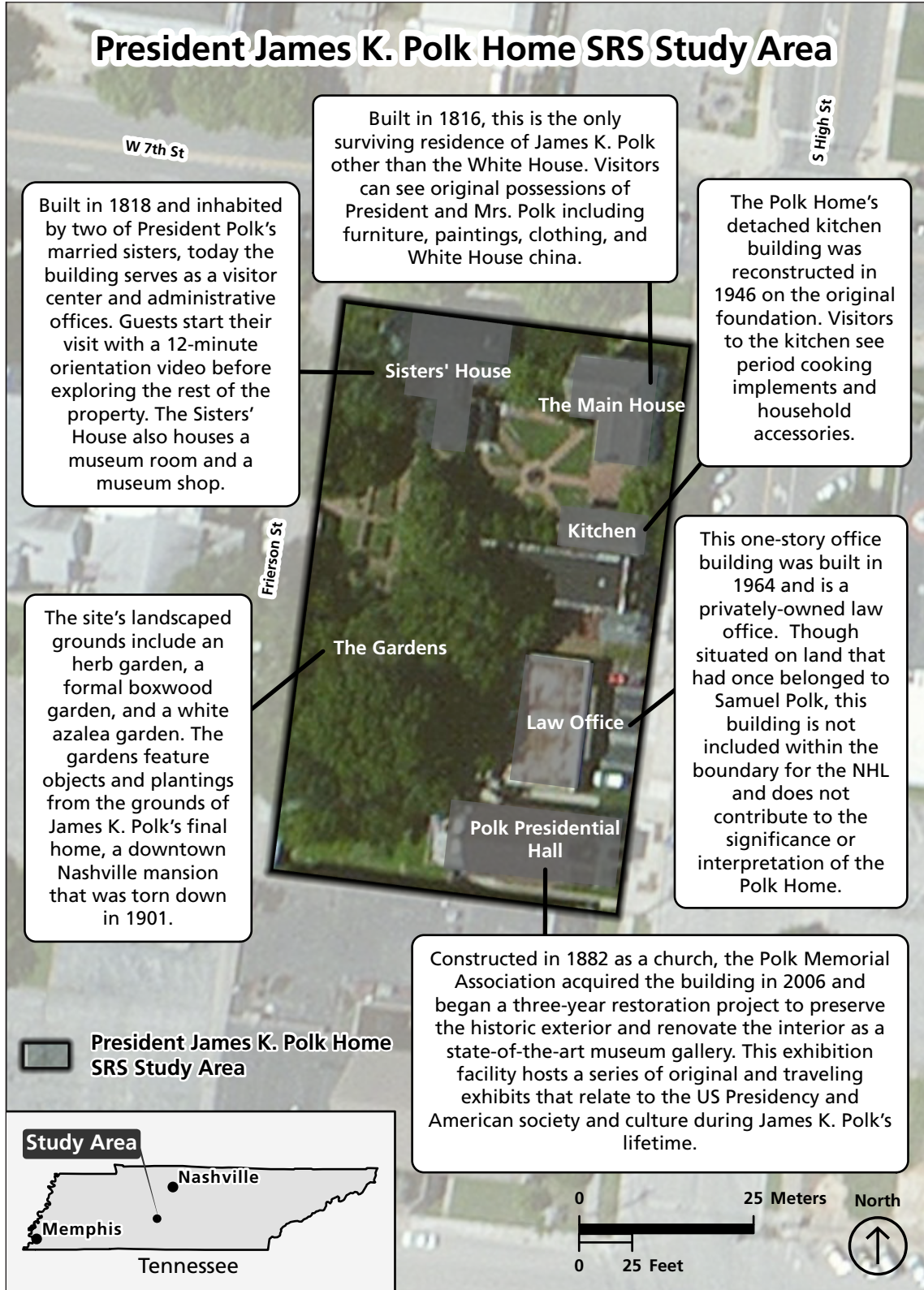
The President James K. Polk Home (Polk Home) is located at 301 West 7th Street in downtown Columbia, Tennessee, the county seat of Maury County, about 48 miles southwest of Nashville. The Polk Home is on the northeast corner of a 2.5-acre city block bounded on the east by South High Street, on the south by West 8th Street, on the west by Frierson Street, and on the north by West 7th Street (figure 1). The home is situated two blocks west of the courthouse square in downtown Columbia, and the neighborhood surrounding the home includes churches, a bank, a public library, and other residential and commercial structures dating to the 19th and 20th centuries (NPS 2014; Rettig and Sarles 1976). According to the 2020 census, the population of Columbia is just over 41,500, and the population of Maury County is almost 101,000. Maury County is a heritage tourism destination due to the Polk Home, the Columbia Athenaeum, the Mule Day celebrations in April, and nearby historic plantation homes.



**Figure 1.** Map of Columbia, Tennessee, Indicating the Location of the Polk Home and Adjacent Property (NPS 2014)

The study area encompasses the Polk Home and adjacent property that includes the Sisters' House, the kitchen outbuilding, the gardens and garden cottage, the Polk Presidential Hall, and a privately owned and operated law office. As the only surviving residence in which President James K. Polk lived besides the White House, the Polk Home in Columbia is most closely associated with James K. Polk (NPS 2014; NPS 1982). Department of the Interior Secretary Stewart L. Udall declared the Polk Home eligible for status as a National Historic Landmark (NHL) in 1961 for its association with the 11th president of the United States (NPS 1961).

The Polk Home, the Sisters' House, portions of the lot upon which the dining room and kitchen were reconstructed on their original foundations, and the gardens make up the NHL boundary, as the site had been nominated as a National Historic Landmark using the National Survey of Historic Sites and Buildings under Theme XIII, Political and Military Affairs 1830–1860 (NPS 1960; Sarles 1960). Correspondence between the National Park Service and the Polk Memorial Association began after the announcement, and the NHL application form was submitted and accepted later that year (Cox 1961; Gardner 1961; Littleton 1961; Porter 1961; Smith 1961; Tolson 1961; Wright 1961a, 1961b, 1961c; DOI 1961c).



**Figure 2.** Aerial View of the Polk Home and Adjacent Property Included in the Special Resource Study

The bronze NHL marker and certificate were presented to the Polk Memorial Association in 1962 as part of the association’s general membership meeting (Gardner 1962). In 1979, the official documentation for the Polk Home National Historic Landmark was accepted using the National Register of Historic Places nomination form. The nomination noted the boundaries of the National Historic Landmark include the Sisters’ House and kitchen outbuilding but that neither of these buildings contributes directly to the national significance of the Polk Home. Both were included in the boundaries for convenience in definition and because of their value in maintaining the historic setting of the Polk Home (NPS 2014; Rettig and Sarles 1976).

### STUDY METHODOLOGY/PROCESS

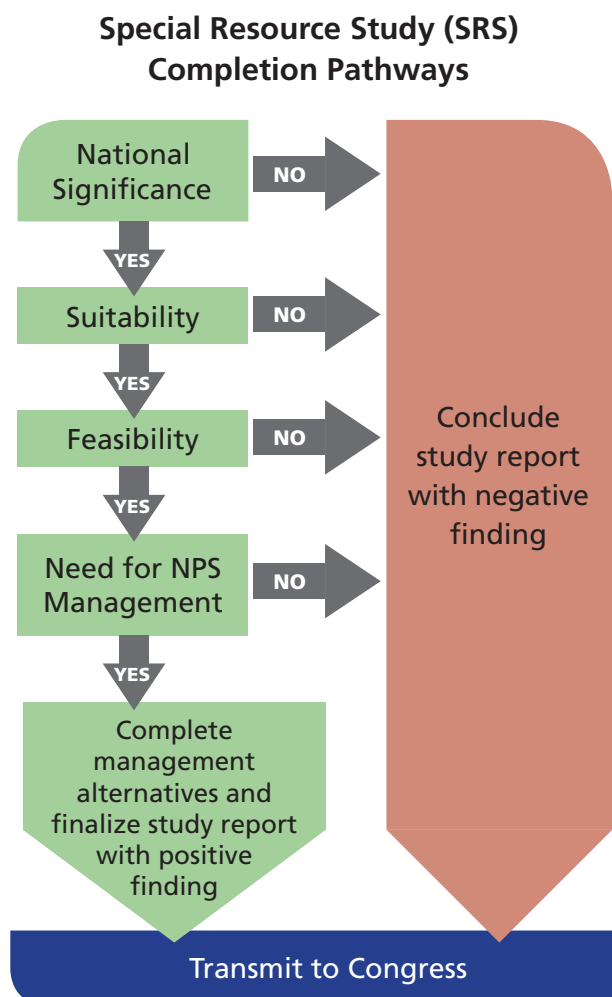
The special resource study process is designed to provide Congress with critical information about the resource qualities within the study area and potential alternatives for their protection. By law (Public Law 91-383, section 8, the National Park System General Authorities Act) (recently codified in 54 USC 100507)) and NPS *Management Policies 2006*, potential new units of the national park system must fully meet the following four criteria for evaluation:

- possess nationally significant natural and/or cultural resources;
- be a suitable addition to the national park system;
- be a feasible addition to the national park system; and
- require direct NPS management that cannot or will not be accomplished by another governmental entity or by the private sector.

This study includes the findings for these four criteria and will serve as the basis for a formal recommendation from the Secretary of the Interior as to whether or not the study area should be designated as a new unit of the National Park Service.

The following methodology, illustrated in figure 3, was used to conduct this special resource study and determine if the Polk Home meets these criteria.

Figure 3. SRS Completion Pathways



### **Step 1: Assess Public Views and Ideas about the Polk Home and Adjacent Property**

Through a process called “scoping,” the study team collects information about the study area and its resources. National Park Service staff identify existing information sources and data needs, issues, and potential constraints. The canvassing of existing conditions and available data, such as designation status and nominations and theme studies, is a critical element of scoping and a factor in developing the special resource study. Site visits to the study area may be conducted to assess resource conditions and provide additional information that could be used in the development of the study findings.

During the early stages of the study, the team begins the process of identifying the stakeholders, agencies, and individuals with a direct interest in the study area or with expertise that could assist the team; this process facilitates planning for later stakeholder conversations and public outreach activities. Engaging the potential stakeholders in the scoping process allows the public; neighbors of the study area; local, state, and other federal government agencies; and other stakeholders to share insights about their issues, concerns, ideas, goals, and objectives for the area. This process also provides a way for the study team to gauge the level of interest and community support in designating the study area as a unit in the national park system. Information collected and research conducted through this scoping process is used in the analysis of the four criteria for evaluation.

### **Step 2: Evaluate National Significance, Suitability, Feasibility, and Need for Direct NPS Management**

To be considered for designation, potential new park units must satisfy all four criteria noted previously. Based on the nature of the study process, a sequential evaluation of these criteria is utilized. While a study area may clearly be infeasible or not in need of direct NPS management, the study process must first establish national significance and then if that criterion is met, suitability, and so on.

If the study area is found, or confirmed, to be nationally significant, the study process continues on to the evaluation of suitability. If the resource is found to be nationally significant and suitable, the study process continues on to the evaluation of feasibility. If the resource is found to be nationally significant, suitable, and feasible, the study process continues on to the evaluation of need for direct NPS management. The study area is evaluated for the need for direct NPS management when an area has been found to meet all of the first three criteria for evaluation. Once the fourth criterion is met, the study proceeds with developing alternatives. An option for a potential new park unit can be included in the range of alternatives only if the study has determined that direct NPS management is clearly superior to other existing management approaches.

If the study determines that the resource does not meet any one of these criteria, the study process usually ends, and the study outcome is a negative finding.

### Step 3: Final Study Completion and Transmittal to Congress

Following rigorous agency review and affirmation of the study findings, the final special resource study report will be transmitted by the NPS Director to the Secretary of the Interior. The report and any recommendations from the Secretary of the Interior are then transmitted to Congress, which may or may not act on a study's findings. If legislation for the establishment of a new unit is drafted, it will usually draw from study findings. The time period in which Congress acts is unknown.

The final special resource study report is made available to the public following receipt by congressional members. This is accomplished by posting the study report to the NPS Planning, Environment, and Public Comment website. Study documents are not shared prior to their receipt by Congress nor can findings be discussed with the public or with key stakeholders until their transmittal.

### COMPLIANCE WITH THE NATIONAL ENVIRONMENTAL POLICY ACT

The National Parks Omnibus Management Act of 1998 requires each study to be “completed in compliance with the National Environmental Policy Act of 1969” (42 USC 4321 et seq.) (54 USC 100507). This study complies with the National Environmental Policy Act of 1969 (NEPA), as amended, which mandates that all federal agencies analyze the impacts of major federal actions that have a significant effect on the environment.

A categorical exclusion was selected as the most appropriate NEPA pathway for this study.

The study is excluded from requiring an environmental assessment or environmental impact statement because there is no potential for impacts on the human environment without further legislative action by the US Congress.

The applicable categorical exclusion is in the category of: “Adoption or approval of surveys, studies, reports, plans, and similar documents which will result in recommendations or proposed actions which would cause no or only minimal environmental impact” (NPS *NEPA Handbook*, 3.2 (R)).

### SUMMARY OF CIVIC ENGAGEMENT

The National Parks Omnibus Management Act of 1998 requires special resource studies to be prepared with public involvement, including at least one public meeting in the vicinity of the area under study (54 USC 100507). The official public comment period opened on January 19, 2021, and closed March 20, 2021. During the public comment period, the National Park Service solicited feedback from the public through a public scoping newsletter (virtual and hardcopy), the Planning, Environment and Public Comment (PEPC) website, a story map with links to the PEPC website, and one virtual public meeting that was announced via the PEPC website, and a press release to local and regional media and social media. As a result of the COVID-19 pandemic, which precluded in-person meetings for much of 2020 and 2021, a virtual meeting was held in which the public had access to materials and information through the internet platform, Microsoft Teams, during a live presentation event. The public informational session was held early in the study process on January 28, 2021, from 6:00 to 7:30 pm CT (local time for the study area). This virtual meeting and accompanying presentation, newsletter, story map, and PEPC page provided an opportunity to inform the general public about the study process and gain an understanding of whether there was public support for the creation of a potential park or other NPS involvement. The virtual meeting was attended by 23 people, and, overall, public support for the study was positive.



## **SPECIAL RESOURCE STUDY LIMITATIONS**

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This special resource study incorporates best available information during the study period. A special resource study serves as one of many reference sources for members of Congress, the National Park Service, and other persons interested in the potential designation of an area as a new unit of the national park system. The reader should be aware that the analysis and findings contained in this report do not guarantee the future funding, support, or any subsequent action by Congress, the Department of the Interior, or the National Park Service. Because a special resource study is not a decision-making document, it does not identify a preferred NPS course of action.

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## CHAPTER 2: HISTORIC BACKGROUND AND RESOURCE DESCRIPTION

### INTRODUCTION

Because Congress directed the National Park Service to investigate historic resources like the Polk Home as a potential new unit of the national park system, understanding its historical context, site treatment, and condition is essential. This chapter describes the historical context of the study area, the Polk Home, and adjacent property, identified through the special resource study process. The information and research presented in this chapter were used in the analysis of the four criteria for evaluating the study area presented in chapter 3 of this study.

### HISTORICAL BACKGROUND

James Knox Polk was born in a log farmhouse in Mecklenburg County near Charlotte, North Carolina, on November 2, 1795, as the first of 10 children (Friedel and Sidey 2006; Seigenthaler 2003; Petterson 2002; Ferris 1977; Nelson and Nelson 1892). In 1806, he and his family, as well as seven enslaved people owned by Polk's father, Samuel, moved to Tennessee, settling in what is now Maury County (Seigenthaler 2003; Baud 2013; NPS 2014). Samuel Polk purchased three lots in the town of Columbia in 1816 and constructed a two-story brick house on the corner of now West 7th Street and South High Street (NPS 2014). The Polk family did well financially, and Samuel was a leading citizen in Maury County (National Heritage Corporation 1976; Weaver and Eidson 1965), ultimately acquiring thousands of acres and more than 50 enslaved people (Mann 2020; Dusingberre 2003; Petterson 2002). James K. Polk, who was sickly during most of his youth (Ikard 1984), was schooled at home and at two Presbyterian schools in Middle Tennessee (Borneman 2009; Ferris 1977; National Heritage Corporation 1976).

Prior to moving to the Columbia home, James K. Polk was already away at school at the University of North Carolina at Chapel Hill (DeFiore 2014; Borneman 2009; Petterson 2002; Weaver and Eidson 1965).

At the age of 20, James K. Polk continued his education at the University of North Carolina at Chapel Hill, graduating with honors in 1818 (Friedel and Sidey 2006; Ferris 1977). After graduating, Polk briefly returned to his parents' home in Columbia before leaving for Nashville to study law under prominent Nashville lawyer and politician Felix Grundy. Over the next two years, Polk traveled back and forth between Nashville and his parents' home in Columbia. With Felix Grundy's political influence, James K. Polk was elected as the clerk of the state senate in 1819 and held that position until 1823 (Petterson 2002; Weaver and Eidson 1965). After passing the bar exam in 1820, Polk opened a law office and began a successful practice in Columbia. Three years later, James K. Polk ran for the state legislature and was elected to the Tennessee House of Representatives as a Democrat, serving one term from 1823–1825 (NPS 2014).

On January 1, 1824, James K. Polk married Sarah Childress of Murfreesboro, and the couple moved to a house a few blocks away from Polk's parents' residence in Columbia, which no longer stands (NPS 2014; Petterson 2002; Nelson and Nelson 1892). James K. and Sarah had no children, which may have been due to one of James's childhood illnesses (bladder stones) and subsequent operation (DeFiore 2014; Seigenthaler 2003; Ikard 1984). The Childress family, who enslaved numerous women and men, gave James and Sarah 10 enslaved people at the time of their marriage (Baud 2013; Petterson 2002).

Also at the time of their wedding in 1824, Samuel Polk gave them a young, enslaved man named Elias, who had been born into slavery in 1806 in Mecklenburg County, North Carolina, and was forced to relocate with the family to Tennessee. James K. and Sarah later took Elias, along with several other enslaved individuals, and moved them to the White House and Polk Place in Nashville (Kinslow 2018). Most of the people enslaved by the Polk family worked on the family's Mississippi plantations. Few of the people enslaved by the Polk family are known to have provided domestic labor (Mann 2020). After Samuel Polk's death in 1827, the men, women, and children Samuel had enslaved were disbursed among James K. Polk and his nine siblings (Mann 2020; Baud 2013).

### **US Congress**

In 1825, Polk was elected to the US House of Representatives. He moved to Washington, DC for the duration of his seven terms in Congress (1825–1839). Sarah joined him in Washington, DC in 1827 (Kinslow 2018; DeFiore 2014; Merry 2010; Petterson 2002; Nelson and Nelson 1892). Polk, who was befriended by Andrew Jackson in 1820, was a staunch supporter of Jackson and the Democratic Party and became one of Jackson's closest allies in Congress (Borneman 2009; Friedel and Sidey 2006; Petterson 2002; Ferris 1977). Under Andrew Jackson, the Democratic Party coalesced around his personality and the party reformed into "Jacksonian Democracy," which sought to restructure federal institutions largely for the benefit of white men (Lynn 2019; Onion et al. 2019). In fact, Polk so strongly supported Jackson's initiatives that his colleagues nicknamed him "Young Hickory." In 1832, Polk became a member of the Committee on Ways and Means and led the Jacksonian fight in Congress on the Second Bank of the United States. By December 1833, Polk was selected as the chairman of the Committee on Ways and Means, and all questions dealing with the bank were referred to his committee (NPS 2014; Merry 2010; Friedel and Sidey 2006; Seigenthaler 2003).

From this position, Polk became the primary defender of President Andrew Jackson during his two terms in office (1829–1837) (Borneman 2009).

In 1834, Polk was defeated by Whig Party candidate John Bell for the office of Speaker of the House of Representatives. With President Jackson's support, however, Polk became the Speaker of the House in 1835, a position he held for four years until his retirement from Congress in 1839 (NPS 2014; DeFiore 2014; Borneman 2009; Friedel and Sidey 2006). The House was bitterly divided, and Polk, unlike other speakers who tried to maintain neutrality, preferred partisanship, and he came to lead President Andrew Jackson's allies and Jackson's Bank War (Borneman 2009; Friedel and Sidey 2006; Nelson and Nelson 1892). Jackson distrusted the Second Bank of the United States, a private corporation, which had been chartered and partially funded by Congress in 1817 for 20 years. Jackson opposed the rechartering of the bank and claimed the bank was unconstitutional, putting Jackson at odds with an 1819 Supreme Court ruling that the bank was constitutional. Jackson's Bank War became a central issue in Jackson's second presidential campaign and led Jackson's opponents to organize into the Whig Party, while Jackson's supporters called themselves Democrats. When the bank's charter expired in 1836, there was no regulating force on state banks. Many investors panicked and banks closed. The issue of separating or combining the nation's finances and government would also be an issue not settled under the presidency of James K. Polk (Mullin 2022; Feller 2008; Tessoroff 1999).

### **Tennessee Governorship**

After serving in the US House of Representatives, Polk was persuaded by the Democratic elite in Tennessee to run for governor against the incumbent Whig, Newton Cannon. Although Polk knew that the state's governor had limited power, he had greater ambitions to one day land in the White House.

He envisioned the governorship as a steppingstone to his ultimate goal, president of the United States. Polk took the risk of giving up his seat in Congress and was elected governor of Tennessee in 1839. During Polk's governorship, the primary issues he faced included problems with specie payments (coin or bullion) to state banks; investment in internal improvements such as railroads, turnpikes, and navigable rivers; support of common schools (Byrnes 2001); reforms for the Tennessee Lunatic Asylum (Oliver 2017, Byrnes 2001, Thompson 1944); reform in the laws for electing presidential electors; and movements to restrict tippling houses (Byrnes 2001).

With the growth of the abolitionist movement, slavery was becoming more of a national issue. Depending on the elected position he held, Polk's actions on slavery varied. He voted for every pro-slavery measure brought before Congress while serving as a representative (1825–1839) of Tennessee, a slaveholding state; he prevented any legislation regarding slavery to be brought up for discussion while Speaker of the House (1835–1839), as the high numbers of arguments on slavery slowed down Congress; and as governor of Tennessee (1839–1841), he tried to remain politically neutral, as the state was divided (Mann 2020; Baud 2013). As governor, Polk maintained a strict interpretation of the US Constitution, noting that it acknowledged slavery and therefore, implicitly protected it (Leonard 2001). Polk further classified abolition as a political question to draw attention and votes to those who supported it (Chaffin and Cohen 2013).

Despite taking a politically neutral stance as governor, Polk's attitude on slavery and westward expansion were influenced by his upbringing on the western frontier and by contact with the people his family enslaved.

Polk was pro-slavery as he continued to expand his real estate holdings and profits by enslaving men, women, and children on his plantations first in Somerville, Tennessee (1831–1834), and later, Yalobusha, Mississippi (established in 1834), while his political career ascended (Mann 2020; Baud 2013). While Polk's views on slavery evolved over the years, and he ultimately thought that the federal government did not have the authority to limit the expansion of slavery into western territories, Polk also continued to benefit from the labor of enslaved people on his western plantation (Mann 2020; Baud 2013).

Shortly after his win as governor, Polk saw an opportunity to possibly enter the White House sooner than expected. In the presidential election of 1840, the incumbent vice president, Richard M. Johnson, was considered a liability to the reelection of President Martin Van Buren due to issues in his personal life (Miller Center 2022; Shafer 2021; Dorfman 2021; Myers 2019; Brown 1993; Meyer 1932). As Johnson's personal life was becoming increasingly scrutinized, Democrats were looking for a replacement vice presidential nominee. Polk actively campaigned to be nominated for vice president. Although he failed to win the vice presidential nomination, Polk's efforts put his name in the national spotlight. Polk campaigned tirelessly for Van Buren, but the Democratic Party was ultimately defeated by Whig candidate, William Henry Harrison (Byrnes 2001; Merry 2010).

Following the disappointing result of the presidential election, Polk focused on winning another term as governor of Tennessee. However, in the 1841 election, Polk narrowly lost to his Whig opponent James C. Jones. This was Polk's first defeat at the polls. Polk unsuccessfully challenged the incumbent Jones again in 1843. After successive losses at the state level, Polk focused his efforts on the White House, this time as a presidential candidate (Seigenthaler 2003; Byrnes 2001).

### Presidential Election of 1844

The political landscape leading to the presidential election of 1844 was one of turmoil. Texas annexation and the issue of slavery were the central issues of the general election, while the reoccupation of Oregon territory was a minor issue at the time (Borneman 2009; Ferris 1977).

After securing independence from Spain in 1821, the newly formed Republic of Mexico granted land to European American settlers, who sought wealth in the new country through building plantations worked by enslaved Africans. The Mexican government abolished slavery in 1829, and the European American settlers lobbied for a reversal of the law. Having not succeeded in reversing the ban (Dunbar-Ortiz 2015), the settlers, as the Republic of Texas, had declared independence from the Republic of Mexico in 1836 and applied for annexation to the United States in the same year. The Democratic and Whig parties opposed the introduction of Texas, which was a vast slave-holding region, into the United States, where the political climate was saturated with pro- and antislavery debates in Congress. The political leaders also wanted to avoid war with Mexico, which did not recognize the independence of Texas. By the 1840s, Texas was looking toward Great Britain to mediate its recognition of independence from Mexico (Borneman 2009; NPS 1960).

In 1843 President Tyler, who was seeking a full term as president (having succeeding William Henry Harrison upon his death), began to work toward the annexation of Texas. Tyler believed that the annexation of Texas would be an economic benefit to the United States. He also feared that the involvement of Great Britain would result in the emancipation of slaves in the territory, which would undermine slavery elsewhere in the United States (Borneman 2009; Ferris 1977; NPS 1960).

President Tyler secured the Tyler-Texas Treaty for annexation in April 1844 and sent it to the Senate for debate and votes. In short, this treaty stated that Texas could cede all its public lands to the United States and the government would assume its bonded debt of up to \$10 million. The boundaries of Texas were left unspecified, and any allusion to slavery was omitted, though it was understood that three slaveholding states would be created out of the territory (Borneman 2009; Ferris 1977; NPS 1960).

The language on slavery was vague in order to prevent antagonizing antislavery sentiments during the Senate debates. The content of the treaty, however, was publicly leaked, and there was a national outcry that the annexation of Texas was designed to preserve slavery. Antislavery and therefore anti-annexation of Texas sentiment threatened a sectional split among the major political parties of the day (Democrat and Whig) (Borneman 2009; Ferris 1977).

President Tyler, lacking support from both the Democratic and Whig parties, planned to run for reelection as a third-party candidate. Tyler intended to draw votes from those favoring the annexation of Texas, which were largely Democrat. However, a split Democratic Party could result in the election of the Whig nominee, Henry Clay (Pinheiro 2020; Merry 2010; Ferris 1977).

During the 1844 Democratic National Convention, the early leader for the nomination for president was former President Martin Van Buren. Other prominent candidates included Lewis Cass and James Buchanan. Van Buren was opposed to Texas annexation, and this position damaged his candidacy with pro-annexation and expansion Democrats. Andrew Jackson and southern Democrats also lobbied against Van Buren and successfully blocked him from the nomination.

James K. Polk, who was originally a leading contender for the vice presidential nomination with Van Buren, won the nomination as the “dark horse” candidate for the presidency on the ninth ballot. Polk was favored by Jackson and the southern Democrats as he publicly asserted that Texas should be “re-annexed” and all of Oregon “re-occupied” (Pinheiro 2020; Borneman 2009; Freidel and Sidey 2006; Seigenthaler 2003; Ferris 1977; NPS 1960; Nelson and Nelson 1892).

Jackson had urged the choice of a candidate committee to what many considered the nation’s “Manifest Destiny,” so Polk campaigned on the platform to expand the territory of the United States, with both Texas and Oregon territories. Concerning the Oregon boundary dispute, Polk’s platform claimed the entire area, from the California boundary northward to a latitude of N54°40’, the southern boundary of Russian Alaska. Henry Clay, who was the Whig nominee for the presidency, tried to take the expansionist issue out of the campaign (Freidel and Sidey 2006; Ferris 1977).

By August of 1844, Tyler withdrew from the race. Tyler, assured that Polk would advance Texas annexation, urged his supporters to vote for Polk. Meanwhile, Clay’s unclear stance on Texas annexation contrasted with Polk’s staunch belief in acquiring the territory. Furthermore, Polk was able to unite the issue of Texas annexation and slavery, which was popular with proslavery Southern expansionists, and an ongoing boundary dispute over Oregon with Great Britain, which won favor with anti-slavery Northern expansionists (Freidel and Sidey 2006; Ferris 1977; NPS 1960).

## US Presidency 1845–1849

In 1844, by fewer than 40,000 votes, Polk defeated Henry Clay to become the youngest person elected to the presidency at age 49. Highlighting the division of the Union at the time, Polk did not win his home state of Tennessee. Upon election, Polk promised that he would not run for a second term and set a schedule to accomplish all of his goals within one term (Pinheiro 2020; Seigenthaler 2003; Ferris 1977; Nelson and Nelson 1892). Before Polk could take office on March 4, 1845, however, several actions moved the United States closer to annexing Texas. In February of 1845, President Tyler urged Congress to pass a joint resolution to annex Texas, and after much debate, the Senate voted to admit Texas into the Union. Tyler, on his last full day in office sent the offer of annexation to Texas. Justifying his action to support Polk, Tyler argued that the incoming president would be under political pressure to renegotiate the annexation. Upon taking office, President Polk upheld Tyler’s action, which resulted in Mexico severing diplomatic relations and raising the possibility of war as Polk assumed the presidency. That possibility would become a reality in 1846 (Pinheiro 2020; Mann 2020; Friedel and Sidey 2006).

Polk had four clearly defined goals for his presidency: acquire some or all of the Oregon territory, acquire California and its harbors from Mexico, reduce tariffs, and reestablish the Independent Treasury System. Polk tried to keep the issue of slavery, of which he was in favor (having doubled his personal slaveholdings to over 70 people while president), out of his presidential agenda. He expressed his concerns in his presidential diaries that both the anti- and proslavery arguments would lead to civil war (Mann 2020).

By 1845, the Oregon territory was becoming increasingly settled by Americans, and in an attempt to fulfill one of his goals, Polk turned toward diplomacy in securing the boundary with Great Britain.

Despite Great Britain's threats of war over the boundary expansion, after many negotiations, Great Britain's Minister, Richard Pakenham agreed to a boundary along the 49th parallel, from the Rocky Mountains to the Pacific Ocean, except for the southern tip of Vancouver Island. With the Oregon Treaty ratified by Congress and signed in June 1846, Polk was able to acquire the territory containing present-day Oregon, Washington, and Idaho. Polk, however, was not able to establish a territorial government in Oregon right away (Pinheiro 2020; Freidel and Sidey 2006; Ferris 1977).

Despite his success with the Oregon territories, acquisition of Texas proved far more difficult. Polk upheld Tyler's offer of annexation while attempting to fix the border at the Rio Grande. After some discussion and debate, Texas accepted the terms. Annexation was ratified and approved in July 1845 and Texas became a state in December that same year. Polk prepared for war in part by sending then-Colonel Zachary Taylor to the disputed area on the Rio Grande. However, Polk did not think that war would come to fruition, believing instead that Mexico would prefer diplomacy (Pinheiro 2020; Mann 2020; Friedel and Sidey 2006; Ferris 1977).

Following Texas becoming the 28th state, Polk sent diplomat John Slidell to Mexico to purchase New Mexico and California for between \$20 and \$40 million and to secure Mexico's agreement to a Rio Grande border. Mexican President José Joaquín de Herrera refused to receive Polk's envoy, and public sentiment in Mexico was hostile toward the United States. President Herrera was thereafter shortly deposed through a military coup led by General Mariano Paredes, who vowed to take back Texas for Mexico (Pinheiro 2020; Mann 2020; Freidel and Sidey 2006; Ferris 1977; NPS 1960).

After a clash just north of the Rio Grande in late April 1846 between Taylor's troops and Mexican troops, known as the Thornton Affair in which Mexican troops had killed part of a patrol and captured the rest.

Polk declared that American blood had been spilled on US soil, and he requested and received a declaration of war from Congress on May 13, 1846, despite strong opposition from Northern representatives who were antislavery. This marked the beginning of the Mexican-American War, a war begun by Polk by exploiting the political conflict within the United States. While there was some popular enthusiasm for the war early on, the conflict became increasingly controversial over time, and by the fall of 1846, the war was so unpopular that the Whigs won a majority in the House of Representatives. Sixteen months after the declaration of war, US forces drove deep into Mexico, and in September 1847, Mexico City was captured. In the Treaty of Guadalupe Hidalgo, signed on February 2, 1848, and proclaimed by President Polk on July 4, 1848, the United States imposed a Rio Grande border for Texas and paid \$15 million to Mexico for the territories of California and New Mexico (Pinheiro 2020; Guardino 2017; Freidel and Sidey 2006; Ferris 1977; NPS 1960; Treaty of Guadalupe Hidalgo 1848).

While Polk's expansionist platform helped him secure the presidency, his success in expanding the nation's boundary came at the expense of native peoples, who had been living in these newly acquired territories (Dunbar-Ortiz 2015). The sudden acquisition of so much new territory, furthermore, deepened the national division on the issue of slavery, with Northerners unwilling to allow the expansion of slavery into the new territories and Southerners fearing the eventual extinction of their enslaved-labor economy and way of life. The Democratic Party was also divided on slavery, weakening the party overall.



Additionally, the increasing unpopularity of the Mexican-American War, as well as military victories by Zachary Taylor, who was attractive to the Whigs and later became their presidential candidate in 1848, strengthened the Whig Party.

This resulted in Polk having to contend with division within his party and an increasing Whig Party, all without settling the new territories (Guardino 2017; Chaffin and Cohen 2013; Ferris 1977).

During the Mexican-American War, Oregon had remained unorganized due to congressional arguments about slavery. These debates now included the new territories acquired from Mexico. Polk sought to extend the geographic limits of the Missouri Compromise, which had settled the reach of slavery within the Louisiana Purchase, to the new territories. However, Polk was challenged by anti-slavery northerners in the House and by the Wilmot Proviso, a bill that intended to ban slavery in all territories acquired from Mexico. With fierce maneuvering on all sides and opposition from Polk, the Wilmot Proviso passed the House repeatedly, but without concurrence from the Senate. In 1848, Polk signed the territorial congressional bill establishing the territory of Oregon and the prohibition of slavery within it. The status of slavery in the territories acquired from Mexico remained unresolved (Dusinberre 2003; Mann 2020).

Polk's presidential legacy is vast, and understanding this legacy has evolved over the years. As John C. Pinheiro (Aquinas College) notes, "Under James K. Polk, the United States grew by more than a million square miles, adding territory that now composes the states of Arizona, Utah, Nevada, California, Oregon, Idaho, Washington, much of New Mexico, and portions of Wyoming, Montana, and Colorado.

More than any other president, Polk pursued "Manifest Destiny," a phrase coined by his fellow Jacksonian Democrat, John L. O'Sullivan, to express the conviction that providence had foreordained the United States to spread its republican institutions across North America" (Pinheiro 2020). While the expansion of the United States across the continent is central to Polk's legacy, so too is the dispossession and genocide of native peoples who inhabited this territory, and their responses (Dunbar-Ortiz 2015). The acquisition of these western territories under Polk, while indicating prosperity for some, ushered in destruction for others.

Although Manifest Destiny was a defining characteristic of the Polk administration and its impact is still felt today, Polk accomplished every major goal that he set for himself as a single-term president. Domestically, he successfully stabilized the US banking system and lowered tariffs, reenacted the independent treasury system, created the Department of the Interior, established the US Military Academy, authorized the creation of the Smithsonian Institution, established a new federal depository system, and strengthened the executive office. Polk additionally entered into a treaty with New Granada (Colombia) to guarantee a right of way for US citizens across the Isthmus of Panama, passed the Tariff Act of 1846, and established a warehouse system for temporary retention of undistributed imports as key foreign policy achievements during his administration. Polk came into the presidency with a focused political agenda, and although he may have been able to win reelection, he kept his word to retire after one term (Pinheiro 2022, 2020; NPS 2014; Chaffin and Cohen 2013; Baud 2013; Freidel and Sidey 2006; Seigenthaler 2003; Ferris 1977; NPS 1960).

### Post-Presidency

At the end of his presidency, Polk retired from public office, and he and Sarah moved to Nashville. In 1840, during his term as governor, Polk purchased the former Nashville residence of his one-time mentor, Felix Grundy. The home, known as Polk Place, was the principal residence for James and Sarah outside of the White House. They renovated the residence over the years, constructing additions to the home and installing elaborate gardens. This would serve as the couple’s primary and final residence (Mann 2020; NPS 2014; DeFiore 2014; Nelson and Nelson 1892).

James Polk died from cholera on June 15, 1849, only three months after leaving the White House. James was buried at Polk Place in Nashville. Sarah Polk remained a widow for another 42 years in Polk Place and running the Polk’s Mississippi plantation. In 1860, Sarah sold a half interest in most of the people she enslaved, and in 1865, slavery was abolished in the United States.

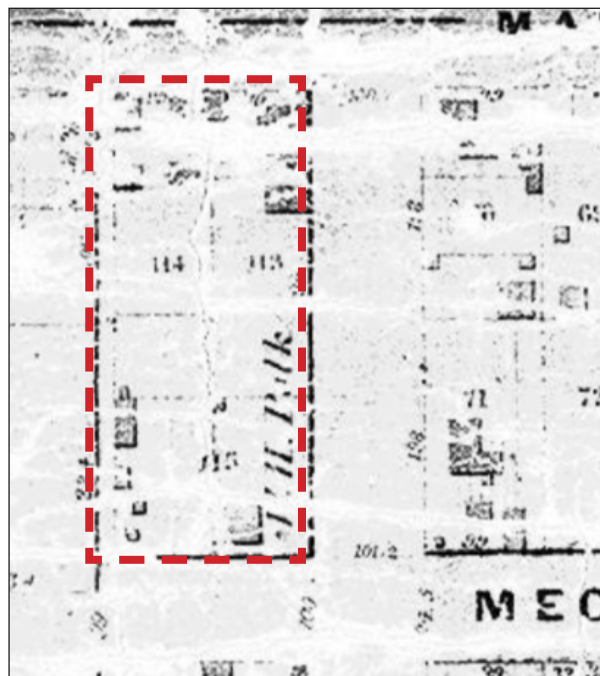
Sarah died in 1891 and was buried next to James at Polk Place. Their remains were later moved to the Tennessee State Capitol when the house was demolished in 1900 (Mann 2020; Greenberg 2019; NPS 2014; Chaffin and Cohen 2013; Freidel and Sidey 2006; Byrnes 2001; Tennessee State Museum 1991; Morton 1971; Nelson and Nelson 1892).

### RESOURCE DESCRIPTION

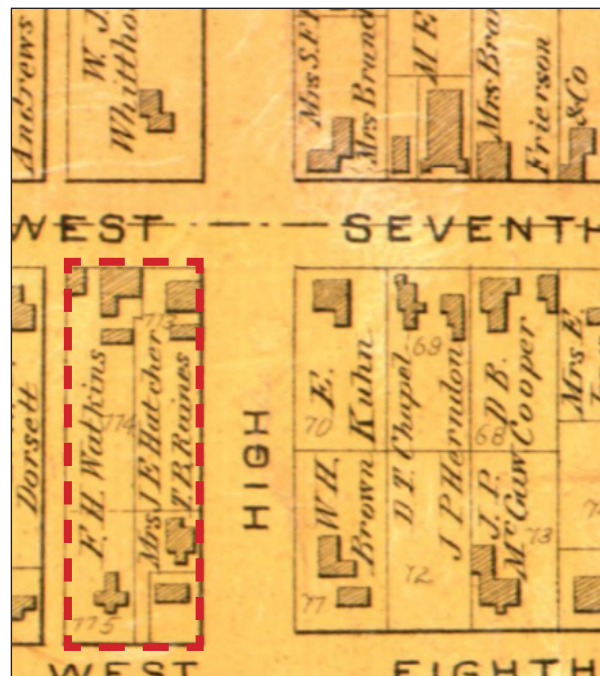
#### The James K. Polk Home

Samuel Polk, James’s father, purchased three lots of land on the western edge of Columbia from the town commissioners in 1816 and began construction of a two-story brick home (the Polk Home). A historic map of Columbia from 1861 shows these three parcels (113, 114, and 115) as belonging to J. K. Polk (figure 4).

**Figure 4.** Hartley and Drayton, 1861 Map of Columbia, with Polk Parcels Encircled



**Figure 5.** Beers & Co., Worley & Bracher, and Bourquin & Co. 1878 Map of Maury County, with Former Polk Parcels Encircled





**Figure 6.** The Polk Home, Columbia (NPS 2014)

The J. K. Polk indicated on the map was not President James K. Polk, but instead his nephew, James K. Polk II, who was born the same year that the president died (Polk Family Bible n.d.). James K. Polk II held the family home and the property until 1871, when he sold the Polk Home and nearly half an acre to Thomas B. Rains (figure 5). The former Polk property was additionally subdivided and sold until purchased by the state in 1929 (Weaver and Eidson 1965; Beers & Co., Worley & Bracher, and Bourquin & Co. 1878).

The Polk Home was constructed in the Federal-style, popular in the United States from 1790–1810, and is an ell-shaped building with a side hall and front and rear parlors. The home has two interior chimneys located at the gable ends of the building. The front façade is unadorned and includes a simple cornice, five window bays, and a Federal door surround with keystones above each opening.

The entrance has recessed molding, pediments, sidelights, and an elliptical glass transom, all typical features of the Federal style. The house has nine-over-nine sash windows with green-painted wood shutters. The gable roof is clad in wood shingles (NPS 2014; Weaver and Eidson 1965) (figure 6).

James K. Polk lived in his parents' Federal-style residence from 1818 until 1824, during which time he was attending college and began his law practice in Columbia before serving in the state legislature, the House of Representatives, as governor of Tennessee, and as the 11th president of the United States (NPS 2014). James K. Polk was most frequently at the home from 1820 to 1824. In 1824, James married Sarah Childress and permanently moved out of the Polk Home (Weaver and Eidson 1965). Samuel Polk and his wife, Jane, remained in the home until their deaths in 1827 and 1852, respectively (NPS 2014).

The Polk Home in Columbia remained in the family until 1871 (Weaver and Eidson 1965) and then changed owners several times before it was purchased by the State of Tennessee in 1929 (NPS 2014).

A few years before, the niece and adopted daughter of Sarah (Childress) Polk, Sarah Polk (Jetton) Fall,<sup>1</sup> had been working to present artifacts belonging to the Polks (bequeathed to her by Sarah) to the state for preservation. Before this could occur, however, Sarah Polk (Jetton) Fall, passed away, but her daughter, Saidee Polk (Fall) Gardner Grant,<sup>2</sup> continued her mother's project and organized and endowed the James K. Polk Memorial Association of Nashville in 1924. In 1929, the James K. Polk Memorial Auxiliary of Columbia was chartered (Weaver and Eidson 1965) to “operate, maintain, preserve, and restore” the Polk Ancestral Home and properties and to “perpetuate the memory of the eleventh President of the United States” (NPS 2014). The James K. Polk Memorial Association opened two parlors and a museum to the public in 1929 and the home itself in 1930 (NPS 2014; Weaver and Eidson 1965).

In 1960, the Polk Home was nominated as a National Historic Landmark using the National Survey of Historic Sites and Buildings form, under Theme XIII, Political and Military Affairs 1830–1860. The Polk Home, the Sisters' House, portions of the lot upon which the dining room and kitchen were reconstructed on their original foundations, and the gardens make up the NHL boundary (Sarles 1960).

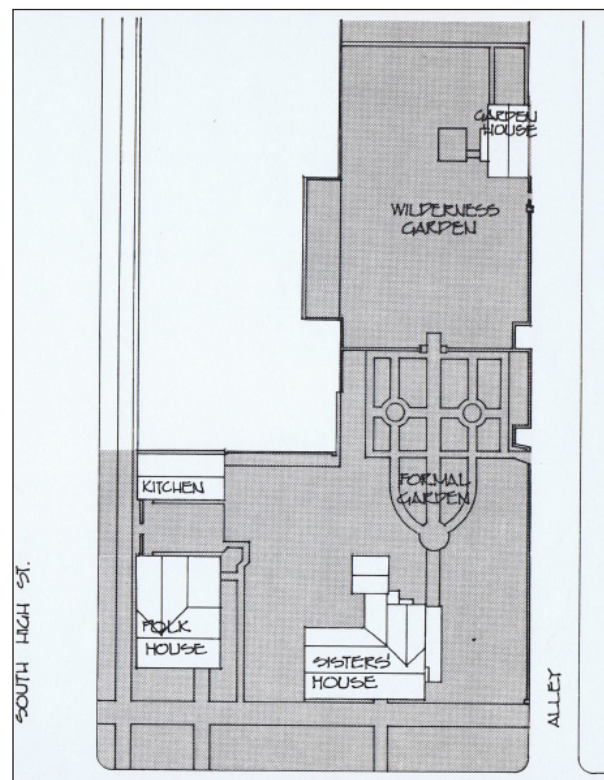
1. Mrs. George William Fall is the name given in Weaver and Eidson, 1965. The naming convention has been updated to provide clearer identification. See Peterson 2002.

2. Mrs. Rollin P. Grant is the name given in Weaver and Eidson 1965. The naming convention has been updated to provide clearer identification. See Peterson 2002 and FindAGrave 2020 for Saidee Polk (Fall) Gardner Grant. <https://www.findagrave.com/memorial/135329712/saidee-polk-gardner-grant>.

The Polk Home was designated a National Historic Landmark (NHL) in 1961, and it is nationally significant under NHL criterion 2 for its association with the 11th president of the United States.

In 1979, the official documentation for the Polk Home National Historic Landmark was accepted using the National Register for Historic Places nomination form. The nomination noted that the boundaries of the National Historic Landmark include the Sisters' House and kitchen outbuilding but that neither of these buildings contributes directly to the national significance of the Polk Home. Both were included in the boundaries for convenience in defining the boundary and because of their value in maintaining the historic setting of the Polk Home (NPS 2014; Rettig and Sarles 1976) (figure 7).

**Figure 7.** Site Plan from the James Knox Polk Ancestral Home Master Plan, 1976



### The Sisters' House

The Sisters' House, located on the same lot immediately to the west of the Polk Home, was built in 1818 by James Purcell for Polk's brother-in-law, James Walker, and his wife Jane (Polk). The original house had three bays and a one-story ell to the rear (figures 8 and 9). The Walkers lived in the house until 1843. From 1849 to 1853, John and Ophelia (Polk) Hays and their family lived in the home. Modifications were made to the home during the Polk sisters' occupation as well as after. In 1941, the State of Tennessee bought the Sisters' House (NPS 2014).

The Sisters' House was included in the NHL nomination for the Polk Home (Sarles 1960; Rettig and Sarles 1979). The Sisters' House does not contribute to the significance of the Polk Home (which is significant for its association with President James K. Polk), but the Sisters' House does have value in maintaining the historic setting of the Polk Home. In 1975, the Sisters' House was individually listed in the National Register of Historic Places as significant at the state level. The nomination notes the Sisters' House as an exceptional example of Federal-style architecture in Middle Tennessee. The nomination also states that the house is significant for its association with the Polk



**Figure 9.** Sisters' House (Photo by Jackson Deparis in NPS 2014)

family (though not President Polk himself) as the residence of James and Jane Maria Polk Walker and Dr. Samuel and Ophelia Polk Hays, both brothers-in-law and sisters to the president (Cross 1975; NPS 2014).

The Sisters' House today is used by the James K. Polk Memorial Association as a visitor center and staff offices and features a small auditorium, gift shop, kitchen, and restrooms (NPS 2014).

**Figure 8.** Polk Home (left) and Sisters' House (right) (Photo by R. Paul Cross, 1975, NRHP Photograph)





**Figure 10.** Reconstructed Kitchen (NPS 2014)

### **Kitchen Outbuilding, the Gardens, and Garden Cottage**

Outbuildings associated with the Polk Home do not survive (NPS 2014). In 1937, the Memorial Association acquired the adjacent lot to the south and constructed a one-story brick kitchen outbuilding with a central chimney and gable roof with wood shingles on the kitchen's original foundation (Dale 2018; Rettig and Sarles 1976; Weaver and Eidson 1965) (figure 10). Some extant material of this outbuilding survived, but the amount of extant material present in the 1930s is not known (Candeto 2020a). The Tennessee Division of Archaeology conducted some archeological monitoring of the area adjacent to and south of the kitchen, but no extant kitchen features were discovered (Tennessee Division of Archaeology, Nance pers. comm., 2020). The remainder of the property behind the Polk Home and the Sisters' House has not had much ground disturbance, and any future archeological work there may provide valuable information (Candeto 2020a).

A small brick courtyard and brick walk connects the kitchen to the Polk Home (figures 11 and 12). The kitchen has not been evaluated for national register eligibility (NPS 2014), but it may be eligible as a reconstructed building in that it is situated on the original kitchen foundation, is situated within a suitable environment, and contributes to the interpretation of the historic district (NPS 1995). Finally, the two-room reconstruction of the kitchen may also indicate its dual use as a laundry or as a living space for an enslaved cook (Candeto 2020a).

Restoration of the gardens began in 1949, and additional land was added to the site in 1953 and 1961 (NPS 2014). The brick walls encircling the garden were constructed around 1950 and may have been constructed using bricks reclaimed from demolished warehouses and other historic buildings in the area (Candeto 2020a). Weaver and Eidson (1965) claim that the brick is handmade and dates to around 1807, though the basis for this claim has not yet been identified (Candeto 2020a).



**(Top) Figure 11.** Garden Brick Wall (noncontributing) beside the Sisters' House; Wall Extends along the Gardens (out of frame) (NPS Study Team 2019)

**(Bottom) Figure 12.** Garden (NPS Study Team 2019)

In the 1960s, the James K. Polk Memorial Association created a formal “boxwood” garden in a 19th-century style to complement the Federal-style residence of the Polk Home (NPS 2014). The formal garden design is not based on what was present during the Polk occupation of the property, however, but rather on the garden from Polk Place in Nashville (Docents' Manual n.d.). In addition to the formal garden layout, an iron fountain and other pieces of outdoor ironwork from the Polk Place in Nashville is present in Columbia. The fountain provides a focal point connecting the Polk Home and the Sisters' House. The fountain has not been evaluated as a historic feature (NPS 2014) (figures 13 through 15).

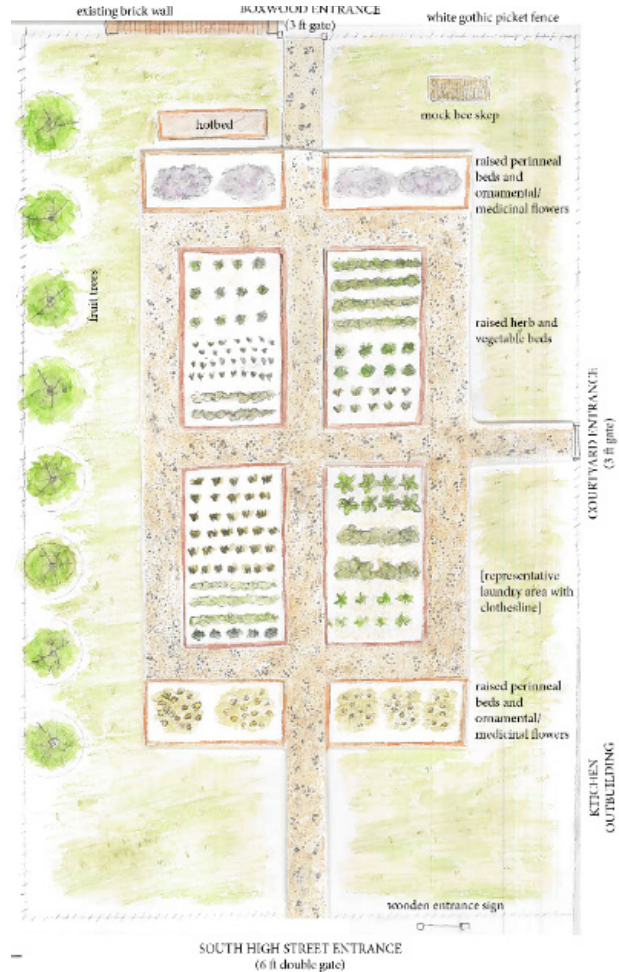


**(Top) Figure 13.** Garden Fountain, Which Was Moved from Polk Place, Nashville (Sisters' House in Background) (NPS Study Team 2019)

**(Center) Figure 14.** Kitchen Outbuilding Showing Removal of the Brick Wall and the Entrance to the Kitchen Garden (NPS Study Team 2021)

**(Bottom) Figure 15.** Garden Fountain and Sisters' House from the Polk Home (NPS Study Team 2019)

In 2020, the Memorial Association began installing a kitchen garden near the reconstructed kitchen outbuilding. The kitchen garden is designed to reflect what the land may have looked like in the 1820s when James K. Polk lived at the property as both a working garden and a status symbol (James K. Polk Memorial Association 2019a; Docents' Manual n.d.). Although there is no documentation on the layout of the garden, research was conducted by independent scholars and the Tennessee Historical Commission to arrive at a final design that combines the functionality of a kitchen garden and work area with the growing aesthetic fashionability of gardens for wealthy families. In fact, a garden, which was located off the Polk Home property, was owned and cultivated by James K. Polk himself (Candeto 2020b; Hornsby Heindl 2019). The kitchen garden features vegetables, fruit trees, medicinal/ornamental flowers, a mock bee keep, a hotbed, and a laundry area. The kitchen garden is not historic (NPS 2014) but may contribute to the interpretation of the historic district (figures 16 and 17).



**(Top) Figure 16.** Kitchen Garden Plan

**(Left) Figure 17.** Kitchen Garden on the Former Orman Tract Showing Reconstructed Kitchen (right) (NPS Study Team 2021)



The garden cottage, in the southwest corner of the site, was added sometime between 1880 and 1910 and is a gable-end wood-frame structure with a full attic and central chimney. The cottage has not been evaluated for national register eligibility. Neither the kitchen, gardens, nor the garden cottage are associated with James K. Polk (NPS 2014) (figure 18).

In 2017, Orman Studios, which had been built in 1947 abutting the reconstructed kitchen of the Polk Home, was demolished (Historic Maury County 2018). Recently, archeological monitoring was conducted during the removal of a building foundation slab on the Orman tract, south of the kitchen. No report was produced for this monitoring, but Benjamin Nance from the Tennessee Division of Archaeology reported that the gravel and soil underneath the slab was heavily disturbed and produced mostly 20th-century artifacts (Tennessee Division of Archaeology, Nance pers. comm., 2020) (figure 19). After the removal of this slab, the Polk Memorial Association began installing a kitchen garden on the site, near the reconstructed kitchen outbuilding (figures 16, 17, and 22).

**Figure 18.** Garden Cottage (NPS Study Team 2019)



**Figure 19.** Kitchen Garden on the Former Location of Orman Studios, Showing Law Office Building (left) and Garden Wall (center) (The Polk Memorial Association 2020)

The kitchen garden is designed to reflect what the land may have looked like in the 1820s when James K. Polk lived at the property as both a working garden and a status symbol (James K. Polk Memorial Association 2019a; Docents' Manual n.d.)

### The Polk Presidential Hall

This 1882 church was constructed after the period of significance (1818–1824) and is not associated with James K. Polk (NPS 2014). The church itself was built to house the Church of Christ congregation in Columbia (Columbia Daily Herald 2015), and the congregation remained at this location until 1925 (West 7th Church of Christ 2020). In 2009, however, and on the same city block as the above property, the James K. Polk Memorial Association purchased the church and renovated the space into a state-of-the-art exhibit facility (NPS 2014) (figure 20).

The renovated church was given the name “Polk Presidential Hall” and has hosted traveling and original exhibits related to the US presidency and American society and culture during the Polk period. In addition to exhibits, the building is used for visitor services (NPS 2014).



**Figure 20.** Polk Presidential Hall (NPS Study Team 2021)

### Law Office

Located at 808 S. High Street and adjacent to Polk Presidential Hall is a one-story office building that houses the law offices of Mounger and Moulder. This building was built in 1964 (State of Tennessee 2021) and was not included within the boundary for the National Historic Landmark (Retting and Sarles 1976). The law office building does sit on land that was originally purchased by Samuel Polk (Hartley and Drayton 1861); however, it does not contribute to the significance of the Polk Home and adjacent property (figures 21 and 22).



**(Top) Figure 21.** Exterior View of Law Offices Showing Proximity to Kitchen Garden on the Former Orman Tract (NPS Study Team 2021)



**(Bottom) Figure 22.** Exterior View of Law Offices (NPS Study Team 2021)

### Other Potential Related and Supporting Resources Considered but Dismissed

No current site in the national park system represents the life or presidency of James K. Polk, and no other extant sites are associated with James K. Polk's life besides the White House. Two sites, the President James K. Polk North Carolina State Historic Site and the President James K. Polk Tomb, are protected by other entities that are discussed in chapter 3. While the birthplace site, unlike the tomb, is directly associated with Polk's life, the birthplace site is a reconstruction and does not compare to the Polk Home in Columbia in terms of character or rarity and is not associated with the productive period of Polk's life.

## CHAPTER 3: ANALYSIS OF THE FOUR CRITERIA FOR EVALUATION

This chapter presents the evaluation of the four criteria that must be met for a study area to be considered for designation as a national park unit. The application of these criteria follows agency and legislated guidance outlined in section 1.3 (Criteria for Inclusion) of *NPS Management Policies 2006* as well as the National Park System New Areas Studies Act (Title III of the National Parks Omnibus Management Act of 1998, PL 105-391; 54 US Code 100507). For a study area to be considered for designation as a potential new unit of the national park system, it must fully meet the following four criteria for evaluation:

1. possess nationally significant resources,
2. be a suitable addition to the system,
3. be a feasible addition to the system, and
4. require direct NPS management or administration instead of alternative protection by other agencies or the private sector.

These four criteria are analyzed sequentially, and several pathways exist for concluding the study process based on individual criteria findings. The study process may be truncated if a negative finding is made for any one of these criteria. The findings presented in this chapter will serve as the basis for a formal recommendation from the Secretary of the Interior to Congress as to whether or not the study area should be designated as a new unit of the National Park Service. A summary of these findings can be found at the end of this chapter.

### EVALUATION OF NATIONAL SIGNIFICANCE

The determination of national significance for a study area is the first step in the special resource study evaluation process. To determine their national significance, historic places or sites being studied for their outstanding cultural resources are evaluated using established National Historic Landmark (NHL) criteria. More rigorous than the National Register of Historic Places nomination process, NHL designation serves as official recognition by the federal government of the national significance of a historic property or site. Outlined in 36 CFR Part 65, the NHL designation process for determining national significance is ascribed to districts, sites, buildings, structures, and objects that possess

1. exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering, and culture; and
2. a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association.

In addition, to be eligible for designation, an area must meet at least one of six “Specific Criteria of National Significance” contained in 36 CFR Part 65:

- **Criterion 1:** be associated with events that have made a significant contribution to and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or

- **Criterion 2:** be associated importantly with the lives of persons nationally significant in the history of the United States; or
- **Criterion 3:** represent some great idea or ideal of the American people; or
- **Criterion 4:** embody the distinguishing characteristics or an architectural type specimen exceptionally valuable for the study of a period, style, or method of construction, or represent a significant, distinct, and exceptional entity whose components may lack individual distinction; or
- **Criterion 5:** be composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historic or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or
- **Criterion 6:** have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation of large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts, and ideas to a major degree.

The use of the NHL criteria to determine national significance is the only link between the special resource study process and the NHL program regulations. Usage of these criteria does not confer landmark designation; separate designation processes, governed by other regulations, exist for the NHL program.

### National Significance Evaluation

Criterion 2: (Properties) that are associated importantly with the lives of persons nationally significant in the history of the United States.

The Polk Home was designated a National Historic Landmark on July 4, 1961, by the Secretary of the Interior. The site is nationally significant under criterion 2 for its association with the 11th president of the United States. According to 36 CFR Part 36, section 65.4, national significance is “ascribed to districts, sites, buildings, structures and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling and association,” and which also meet at least one of the NHL criteria listed above. National Historic Landmark criterion 2 also states that a property “be associated with the productive life of an important person and reflective of the period during which the important individual achieved significance.” While the Polk home predates James K. Polk’s most productive period as president, exceptions are made for properties such as this where there are no other more appropriate properties associated with his presidency. In 1965, the Advisory Board on National Parks, Historic Sites, Buildings and Monuments determined that the election of a US president is a historically important event and that appropriate sites associated with a president may be classified as a national landmark. In addition, there are no other extant resources outside of the White House in which James K. Polk lived (NPS 2014; NPS 1985; NPS 1982).

The home, located in Columbia, Tennessee, was owned and occupied by James K. Polk’s parents, Samuel and Jane, and their 10 children, of which James was the oldest. James K. Polk lived in the home as a young adult between 1818–1824 after graduating from the University of North Carolina. During the time he lived in the house, Polk was establishing his early political life. His parents lived in the house until their deaths, Samuel in 1827 and Jane in 1852 (Rettig and Sarles Jr. 1976; NPS 2014).

The Polk Home remained in the family for 10 years after Jane Polk's death. Ownership then changed many times until 1929, when it was purchased by the State of Tennessee. Around this time, a Polk family descendent established the James K. Polk Memorial Association of Nashville (1924) and the James K. Polk Memorial Auxiliary of Columbia (1929). The purpose of these entities is to "operate, maintain, preserve, and restore" the Polk Home and associated properties in Columbia. The James K. Polk Memorial Association opened the home to the public in 1929 and has continued to maintain and operate the home, providing tours, education programs, exhibits, and continues to acquire furniture and objects that once belonged to the Polk family (NPS 2014; Rettig and Sarles Jr. 1976; Weaver and Eidson 1965).

The period of significance for the Polk Home is between 1818 and 1824, when Polk lived in the Columbia house with his parents and siblings. This period also represents the time when James K. Polk was beginning his political career, building his law practice, and making connections with influential mentors such as Felix Grundy and Andrew Jackson, who helped shape his political career and eventually led him to the White House.

### **National Significance Finding**

The home was determined to be a National Historic Landmark in 1961 under NHL criterion 2 for its association with the 11th president of the United States. The original designation documentation for the James K. Polk Home National Historic Landmark was completed in 1960, and the official documentation for the James K. Polk House National Historic Landmark was accepted using the National Register of Historic Places nomination form in 1979. The study confirmed that the house retains integrity and is the most closely associated residence with James K. Polk, since it is the only surviving property outside of the White House in which he resided.

## **EVALUATION OF SUITABILITY CRITERIA**

A study area is considered suitable for addition to the national park system if it represents a natural or cultural resource type that is not already adequately represented in the national park system or is not comparably represented and protected for public enjoyment by other federal agencies, tribal, state, or local governments, or the private sector.

Adequacy of representation is determined by comparing the study area to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. This comparative analysis should also address the rarity of the resources, interpretive and educational potential, and similar resources already protected in the national park system or in other public or private ownership. The comparison results in a determination of whether the study area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas. Based on this determination, a finding on suitability is made.

The following methodology was used by the study team to evaluate the suitability of the Polk Home and adjacent property study area:

1. Define the type of resource represented by the study area.
2. Identify the theme or context in which the study area fits.
3. Identify sites that represent the resource type within the national park system and similar sites protected by other agencies, state, local or tribal governments, and the private sector.
4. Through a comparative analysis, describe how the resource type is represented.

5. Consider the adequacy of representation and determine whether the resource will duplicate, enhance, or expand opportunities for visitor use or resource protection.
6. Prepare a concluding finding on suitability.

### **Type of Resource Represented by the Study Area**

The resource under consideration is the home of the 11th president of the United States, James K. Polk, and adjacent property and landscape elements. This resource is nationally significant due to its association with the life of a person nationally significant in the history of the United States, James K. Polk. Though Polk only lived in the house from 1818–1824 after graduating from the University of North Carolina, it was during this time period he began shaping his political career by building his law practice and making connections with influential mentors. It is the only surviving property, outside of the White House, in which Polk resided.

The careers and lives of US presidents are commemorated by scores of sites, ranging from the humble to the palatial: birthplaces, residences, other buildings, inaugural places, monuments, and tombs. Visits to these sites enhance understanding of the distinguished group of individuals who have led the nation; their ways of life; family backgrounds; locales and regions in which they were born or resided; eras in which they lived; and the social, economic, and intellectual influences that molded them. The National Park Service preserves historic places associated with US presidents ranging from the White House to birthplaces, homesteads, battlefields, and monuments.

This comparison focuses on the current representation of James K. Polk’s life and legacy as well as various other historic presidential sites.

### **Theme or Context in Which the Study Area Fits**

In evaluating the suitability of cultural resources within or outside the national park system, the National Park Service references the 2017 NPS System Plan, as well as its 1994 thematic framework, “History in the National Park Service: Themes and Concepts” for history and prehistory. The NPS System Plan built upon the 1994 framework and examines the special places, stories, ecosystems, and recreational opportunities that the National Park Service currently protects, while identifying gaps and opportunities to seek new ways to protect important natural areas and cultural heritage in the national park system and beyond. The 1994 framework provides additional guidance for the National Park Service related to historic resources and serves as an outline of major themes and concepts that help to conceptualize American history. The framework is used to assist in the identification of cultural resources that embody America’s past and to describe and analyze the multiple layers of history encapsulated within each resource.

As his only surviving residence outside of the White House and representing Polk’s life that influenced his path to the presidency the Polk Home contributes to our understanding of the following themes within the NPS thematic framework and NHL theme studies: “Shaping the Political Landscape,” “Developing the American Economy,” “Black Americans in United States History,” and “Changing the Role of the United States in the World Community.”

The theme “Shaping the Political Landscape” encompasses tribal, local, state, and federal political and governmental institutions that create public policy and those groups that seek to shape both policies and institutions. As a president, Polk certainly shaped the political landscape through a number of influential policies and actions, including acquisition of the Oregon Territory, California, and the Territory of New Mexico;

the positive settlement of the Texas border dispute; lower tariff rates; the establishment of a new federal depository system; and the strengthening of the executive office. These actions are further aligned with the subtopics “military institutions and activities” (the Mexican-American War) and “political ideas, cultures, and theories” (expansionism and westward expansion of slavery). The Polk Home is associated with these themes through primarily being the family home where James K., in part, began to develop his worldview and opinions which he would refine into a clear political agenda while President. As the Polk Home was situated on the western frontier and the Polk family enslaved men, women, and children, Polk’s presidency was largely defined by the expansion of the United States to the west and the protection of slavery. Additionally, the museum collection at the Polk Home reflects Polk’s presidency and how he shaped the political landscape.

The theme “Developing the American Economy” reflects the ways Americans have worked, including slavery, servitude, and nonwage, as well as paid labor. Though Polk tried to keep the issue of slavery out of his presidential agenda, he was protective of the institution and was an enslaver himself. Though there was considerable opposition and antislavery sentiment at the time, Polk’s legacy left the country facing westward expansion of slavery. The subtopics “exchange and trade” and “governmental policies and practices” are also evident in Polk’s success in lowering tariff rates and the establishment of a new federal depository system. The Polk Home, built by the labor of individuals enslaved by James’s father, Samuel (Kinslow 2018; Baud 2013), could help explain how slavery was a fundamental pillar of the American economy during Polk’s time and how the family, like many others, built their wealth from the labor of enslaved individuals.

The theme “Black Americans in United States History” outlines the stories, contributions, and experiences of Black Americans in the history of the United States. James K. Polk was born into the culture of slavery in the American South and his father was an enslaver. Many of the Polk-enslaved workers were descended from those who had been enslaved by the Polk family for generations. The Polks went to great lengths to keep enslaved people within the “family” in order to foster loyalty among the enslaved people and to amass the family’s wealth (Baud 2013). Samuel Polk achieved wealth, status, and renown while living in the Polk Home in Columbia partly due to his use of enslaved labor to build his wealth. From here, James K. Polk was able to make important contacts and alliances which eventually lead to the White House. In recent years, there has been a growing interest in understanding the lives of the people enslaved by the Polk family. At the Polk Home alone, historians are aware of the childhood of Elias Polk, who after emancipation established himself as a political leader in Tennessee with the Democratic Party (Mann 2020; Kinslow 2018). Interpreting the lives of the enslaved individuals at the Polk Home has been an ongoing effort (Baud 2013).

The theme “Changing Role of the United States in the World Community” explores diplomacy, trade, cultural exchange, security and defense, expansionism, and, at times, imperialism. The interactions among indigenous peoples, between the United States and Native peoples, and the United States and the world have all contributed to American history. As the Polk Home was constructed on the western frontier, James K. is one of four other presidents who were raised on the frontier and who’s upbringing there influenced their presidential policies (Andrew Jackson, William Henry Harrison, James K. Polk, and Zachary Taylor) (Ferris 1977). Polk was elected on the platform of westward expansion and was instrumental in setting the boundaries of what came to be the American West.

Therefore, foreign policy was a central feature of his presidency, including negotiations with Great Britain and a war with Mexico.

One cultural resource gap identified in the NPS System Plan corresponds to the Polk Home. The plan noted that the National Park Service currently does little to address the history of US diplomacy and the changing role of the United States in the world community throughout history. Polk's legacy of westward expansion that dramatically changed the landscape of the country does reflect the changing role of the United States and the foreign policy involved with the acquisition of territory. However, the NPS System Plan recognized the most heavily represented themes in the existing system, one of which is US presidents. Thirty-five units (9% of total) celebrate the lives of US presidents. Some presidents have more than one unit dedicated to their life and accomplishments. For instance, many locations associated with President Abraham Lincoln's life and death are protected by park units, including his birthplace, his childhood home, the White House, the site of the Gettysburg Address, the site of his assassination, and his national memorial (NPS 2017).

### Comparable Sites

To determine if similar resource protection and visitor opportunities are already offered by other national park system units or other land management entities, comparable sites are examined. The following are some of the more representative examples of presidential homes and sites managed by the National Park Service and sites protected by other agencies, state, local or tribal governments, and the private sector.

### National Park Service Sites

**Adams National Historical Park**—This unit of the national park system was established to preserve, protect, maintain, and interpret the homes, Stone Library, and grounds in Quincy, Massachusetts, of the second US president, John Adams and his wife Abigail Adams; sixth US president, John Quincy Adams and his wife Louisa Catherine Adams; and subsequent generations of the Adams family. The unit preserves and interprets the homes where John Adams, the second US president, and his son, John Quincy Adams, the sixth US president, were each born. The park also preserves and interprets the estate known as Peace field, occupied by John Adams and his wife Abigail Adams, their son John Quincy Adams and his wife Louisa Catherine Adams, and subsequent generations of the Adams family, including US Ambassador to Great Britain Charles Francis Adams and historians Henry Adams, Brooks Adams, and Charles Francis Adams Jr.

**Martin Van Buren National Historic Site**—This unit of the national park system was established to preserve the Lindenwald estate so that present and future generations of visitors will have an opportunity to learn about the life and public career of President Martin Van Buren and find meaning in the issues facing America during the formative years of the republic through the turbulent decades leading to the Civil War. Martin Van Buren National Historic Site was established by an act of Congress (Public Law 93-486) on October 26, 1974, to commemorate the life and work of the eighth president of the United States. After serving one term, Van Buren moved back to his native Kinderhook, New York, where he had purchased Lindenwald. While continuing to remain active in politics, he devoted much of his time to overseeing the operation of the farm. Lindenwald was declared a National Historic Landmark in 1961 and a national historic site in 1974, at which time the site was administratively listed in the National Register of Historic Places.



The List of Classified Structures includes the Lindenwald mansion, South Gatehouse, the North Gatehouse foundation, the well cap, and the carriage path.

**Lincoln Home National Historic Site—**

This unit of the national park system was established for the benefit of present and future generations to protect and preserve the Springfield home of Abraham Lincoln and the surrounding Lincoln-era neighborhood as a meaningful setting for visitor understanding and appreciation and to interpret Abraham Lincoln and the significant impact his 17-year residency in Springfield had on his emergence as a transcendent national and international figure. The site in Springfield, Illinois, was established in 1971 by Public Law 92-128 (85 Stat. 347). Lincoln Home National Historic Site protects and interprets the home where Abraham Lincoln lived with his family from 1844 to 1861. The park is in downtown Springfield and covers 12 acres over four square blocks. The site preserves 14 houses that date from the Lincoln era, including the Lincoln Home. The park includes 37 buildings. The Lincoln Home neighborhood was diverse, representing many occupations and social and economic levels. Through neighborhood preservation and interpretive activities, the National Park Service seeks to recreate a vivid sense of the relationship of the Lincoln family to their neighbors and the broader Springfield community, enriching the experience of visitors at Lincoln Home National Historic Site.

**Andrew Johnson National Historic Site—**

This unit of the national park system was established to further the study and understanding of the life, career, and legacy of the 17th president of the United States during a challenging time in the nation's history by preserving his homes, workplace, and burial site in Greeneville, Tennessee, for the public's benefit, inspiration, education, and enlightenment. The Andrew Johnson National Cemetery provides an honorable resting place for veterans and their dependents.

Located in the center of Greeneville, Tennessee, just west of the Great Smoky Mountains in northeastern Tennessee, Andrew Johnson's early home, tailor shop, and homestead provide a window into Johnson's rise from tailor to political leader. Andrew Johnson and his family are buried at the crest of Monument Hill within Andrew Johnson National Cemetery.

**Ulysses S. Grant National Historic**

**Site—**This unit of the national park system was established to educate and inspire this and future generations about the lives and legacy of Ulysses S. Grant, Julia Dent Grant, the enslaved African Americans, and other residents by preserving and interpreting White Haven within the context of American history. Ulysses S. Grant National Historic Site, established in 1989, preserves 9.65 acres of an estate in St. Louis, Missouri, that once encompassed an 862-acre plantation and is associated with Ulysses S. Grant, Julia Dent Grant, and enslaved African Americans from 1854–1859 (the period of significance). The site's significance is drawn not from a specific event, but rather from the interaction of Ulysses S. Grant with African American slavery and how that experience impacted him personally and influenced decisions he made as a Civil War general and as a civil rights president. The present-day historic site includes two buildings and three structures from the 19th century: a two-story main residence; a stone outbuilding housing a summer kitchen, laundry room, and possible slave living space; a chicken house; an icehouse; and a stable.

**The White House and President's Park—**

This unit of the national park system was established to preserve and interpret the museum character and cultural resources of the White House—its architecture, artifacts, landscape design, gardens and grounds, and the surrounding parklands—in ways that foster and preserve dignity and respect for the office of the presidency while still allowing for their use.

The history and significance of the presidency, the White House, and President's Park is interpreted, including their relationship to the American public, our republican form of government and the growth of Washington DC. The National Park Service assists the White House Office of the Curator with the management and stewardship responsibilities for an extensive collection of artifacts and objects associated with presidents and their residency at the White House. The White House and President's Park is included in this list of comparable sites, though listed last, as it is not a private residence in the same way that the other comparable sites are but it is the only other structure still standing that is associated with the productive life of President James K. Polk.

#### **Sites Protected by Other Entities**

**President James K. Polk North Carolina State Historic Site**—This site is located on land once owned by the parents of James K. Polk. The site is a North Carolina State Historic Site commemorating significant events in the Polk administration, including the Mexican-American War, settlement of the Oregon boundary dispute, and the annexation of California. Reconstructions of typical homestead buildings, including a log house, separate kitchen, and barn, are authentically furnished. The visitor center features a film on Polk's life and exhibits about his family and tumultuous presidency. The Mecklenburg Chapter of the Daughters of the American Revolution erected a stone monument at the site in 1904. The monument was the first dedicated in North Carolina to the 11th president. A friends group, the Friends of President Polk's Birthplace, is a 501(c)(3) nonprofit organization that supports educational programs and special events at the site.

**President James K. Polk's Tomb**—James K. Polk and his wife Sarah Childress are buried on the grounds of the Tennessee State Capitol in Nashville. Noted architect William Strickland, architect of the Tennessee State Capitol, designed the Greek revival tomb, which was originally located at Polk Place. Polk Place, the Polk's Nashville home, was located a few blocks from the state capitol. The Polk tomb was located on the front lawn of Polk Place from the time of its construction (about 1849) until 1893, when the State of Tennessee moved the tomb to the grounds of the capitol. Polk Place was demolished in 1901 (Daley 2018; Tennessee State Museum 1991; Morton 1971).

#### **Comparative Analysis and Adequacy of Representation**

This section compares the character, quality, quantity, and rarity, combination of resource values, and themes of the historic sites above to those found at the Polk Home and adjacent property.

The resources within the study area—the Polk Home and adjacent property, including structures and landscape elements—possess exceptional historic value for their association with the 11th president of the United States. The interior of the home displays and interprets artifacts representing multiple eras surrounding the period of significance, including the Polk family history, Polk's campaign and presidency, and the era following Polk's retirement.

National Park Service sites broadly comparable to the Polk Home and adjacent property that represent many or all of the themes described above are Adams National Historical Park, Martin Van Buren National Historic Site, Lincoln Home National Historic Site, Andrew Johnson National Historic Site, Ulysses S. Grant National Historic Site, and the White House and President's Park.

These sites all include residences associated with past presidents, but not the president for which the resource under consideration is associated with, James K. Polk. The White House and President's Park is the only existing NPS site which protects one of Polk's residences. However, since all presidents reside in the White House, this unit more broadly interprets the office of the presidency. The birthplace site (North Carolina State Historic Site) and tomb are directly associated with Polk. The birthplace site is a reconstruction and does not compare to the Polk Home in Columbia in terms of character or rarity because the structures on site are reconstructions of what may have historically existed. The tomb is a rare resource, but there is minimal interpretation and education at the site.

Though the NPS System Plan identifies US presidents as one of the most heavily represented themes in the existing system, there is not currently a site within the system or a comparably managed area that compares to the character, quality, quantity and rarity of the Polk Home. Further, the Polk Home contributes to our understanding of the important themes "Shaping the Political Landscape," "Developing the American Economy," "Black Americans in United States History," and "Changing the Role of the United States in the World Community."

The current use of the Polk Home and adjacent property, including tours, education programs, exhibits, and display of furniture and objects that once belonged to the Polk family, has demonstrated that there are abundant opportunities for interpretation, education, and public use. The site is currently open to the public and a variety of interpretive programs have been designed for a range of age groups and interests.

Properties associated with James K. Polk are not yet represented and protected in the national park system or by any other federal agency.

Several existing NPS- and state-owned sites interpret the presidency and a small portion of Polk's life, but none has its main interpretive focus on the beginning of his political career which eventually led him to the White House. Therefore, the resources in the study area are not comparably represented and protected for public enjoyment and would enhance and expand existing resources in the system.

### **Suitability Finding**

The addition of the study area to the national park system would substantially add to the National Park Service's ability to tell the Polk story. Currently, no direct representation of Polk's story or legacy exists in the system. The study area is associated with a period of Polk's life that influenced his path to the presidency and is his only surviving residence. The site is suitable as an addition to the national park system based on the character, quality, quantity, and rarity of the resource and for its educational and interpretive potential for the 11th president of the United States.

### **EVALUATION OF FEASIBILITY**

An area that is nationally significant and meets suitability criteria must also meet feasibility criteria to qualify as a potential addition to the national park system. To be feasible as a new unit or as an addition to an existing unit of the national park system, an area must be of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries) and be capable of efficient administration by the National Park Service at a reasonable cost.

For an area to be considered feasible as a new unit of the national park system, a variety of factors must be considered. In evaluating feasibility for the President James K. Polk Home and adjacent property, the National Park Service considered the following factors:

- size and boundary configuration;
- land ownership, local planning and zoning, and potential land uses;
- existing and potential threats to the resources;
- access and public enjoyment potential;
- public support and socioeconomic impacts

Although these factors are considered individually below, the evaluation of the feasibility of establishing a new national park system unit at the Polk Home takes into account all of the above factors in the context of current NPS management. Evaluation of these factors under criterion 3 must consider if the National Park Service can feasibly manage the proposed new park unit given current agencywide limitation and constraints.

### **Size and Boundary Configuration**

The Polk Home and adjacent property is situated on a 2.5-acre city block made up of seven separate parcels shown in figure 23 below. The 1961 NHL nomination identified the boundaries of the landmark to include the Polk Home, the Sisters' House, the kitchen outbuilding, and the west garden in the southwest portion of the property. A small rectangular tract (labeled small tract on the ownership maps) was acquired in 1961; the Polk Presidential Hall tract was acquired in 2006; and the Orman tract was acquired in 2015. These seven parcels make up the current boundary of the site managed by the James K. Polk Memorial Association.

One additional parcel of land is considered a feasible addition to the current boundary. The additional parcel is located within the same city block between the Orman Tract and the Presidential Hall on South High Street. The current landowners operate a private law practice out of the building on this parcel.

Including this parcel in the boundary will ensure the adjoining land within the city block are compatible with the resources and values within the study area. The owners have expressed interest in selling this property in the future if the site were to be designated as a national park system unit. Figure 23 shows the proposed NPS boundary considered throughout the feasibility analysis. The current size and configuration of the site is conducive to providing a positive visitor experience, including group tours, special events, and programming.

Overall, the size and boundary configuration of the Polk Home and adjacent property is found to be feasible to be managed as a potential new unit of the National Park Service.

### **Land Ownership, Local Planning and Zoning, and Potential Land Uses**

Current owners of the property as outlined in the proposed boundary include the James K. Polk Memorial Association, the State of Tennessee under the Tennessee Historical Commission (state), and two private individuals for the additional parcel (law office). The James K. Polk Memorial Association owns the kitchen parcel and the Polk Presidential Hall. The state owns the Polk Home that was conveyed in trust to the James K. Polk Memorial Association in 1929 state legislation codified in Tennessee Code Annotated section 4-13-201-204. The additional parcels owned by the state include the Sisters' House, West Garden, small tract, and the Orman tract. In the past, there was a difference of opinion on direct ownership of several of the parcels between the James K. Polk Memorial Association and the State of Tennessee. A 2021 contract between the James K. Polk Memorial Association and the state has resolved the ownership issues (State of Tennessee 1980; Brown 2020, 2019; Holtzapple 2020; Blumstein 2017).



Figure 23. The Polk Home Land Parcels and Ownership

Although the state is the direct owner of the additional parcels outlined in yellow in figure 23, the James K. Polk Memorial Association and the state currently collaborate under this contract for the provision of management and maintenance as the primary caretaker for the state-owned portions of the property that were acquired after the 1929 statutory trust was established. The contract agreement was signed by both parties in July 2021, extends for a five-year period, and is expected to be renewed into the future. The contract states that both parties agree to operate the lands and buildings as one common site containing both the Polk Home and related properties.

The parcel in between the Orman tract and the Presidential Hall is a general practice attorney office, located at 808 South High Street. This land parcel was part of the original boundary owned by Samuel Polk. This property is currently owned by two private individuals. Both owners have expressed interest in selling the property in the future if the Polk Home and adjacent property were to be designated a national park system unit to be included as part of the site boundary. Although the building on this parcel is not historically significant, acquiring this parcel as part of the site boundary would be consistent with the original land ownership of Samuel Polk. Possible uses of this property include a visitor center equipped with public restrooms and facilities as well as administrative staff offices. This property has direct access to South High Street with five parking spaces.

The land and surrounding property near the Polk Home is predominately owned by private interests. Directly across West 7th Street, to the north of the property, is the Maury County Visitors Center, located at 302 West 7th Street, which serves as a space to welcome visitors to Columbia and offering tourists information about things to do and see in the area. To the east of the property, across from High Street, is the First Presbyterian Church.

To the west of the boundary is St. Peter's Episcopal Church at 311 West 7th Street. To the south end of the city block is the Mulehouse, a live music venue located at 812 South High Street. This venue is located within the same city block that was once owned by Samuel Polk.

The 2006 Zoning Ordinance for the City of Columbia, Tennessee, designates zoning districts to restrict and regulate the location, construction, reconstruction, alteration, and use of buildings, structures, and land for residence, business, commercial, manufacturing, and other specified uses. The site and adjacent properties are all within the Downtown Historic District; however, the city is in the process of expanding the Arts District to include the Polk Home. This plan is not expected to have significant impacts on the site. The zone is conducive to, and safe for, a significant volume of pedestrian traffic, which is desirable in promoting a high level of contact with consumers.

The 2011 Maury County Comprehensive Plan identifies development categories describing generalized development patterns for a range of natural and built features. Per the plan, the Polk Home, Sisters' House, kitchen, west garden, and small tract are all within the urban corridor, whereas the Orman tract, Polk Presidential Hall, and law office property are within the urban neighborhood. The difference between these two development categories are negligible. The main difference is that the urban corridor category focuses on roadway and transportation corridors to facilitate traffic flow and a variety of land uses. The Polk Home and Sisters' House are within the urban corridor, since they are situated on the relatively busy West 7th Street.

After analyzing the size, boundary configuration, land ownership, and land use of the proposed area, the National Park Service concludes the proposed boundary area is of adequate size to ensure for the protection and visitor enjoyment of the resources associated with the Polk Home and adjacent property.

There is a clearly defined boundary for the site as it currently exists, which is delineated by the seven parcels that make up the site as well as the additional law office parcel.

### **Existing and Potential Threats to Resources**

Because the site is located on a busy city block where surrounding businesses draw public use and is expected to increase in the future, vandalism is one potential future threat to the resources to be considered. The James K. Polk Memorial Association and nearby residents have stated that this has not been an issue in the past, but an increase in activity at the site may bring additional concerns which could threaten the resources. It is possible to mitigate these concerns with additional security measures.

Efforts have been underway for several years to relocate the James K. Polk and Sarah Childress tomb, which contains their remains, from the Tennessee State Capital to the Polk Home in Columbia, Tennessee (Daley 2018). The tomb features a rectangular stone block with inscriptions set upon a stone slab. Four Doric columns at each corner of the slab support a roof structure that includes a simple entablature. The Tennessee House of Representatives narrowly approved a joint resolution in 2018 seeking to move forward on relocating the tomb and burials of President James K. Polk and Sarah Childress Polk (Ebert 2018). Governor Bill Haslam allowed the resolution to become effective without his signature (Bennett 2018). Although the resolution became effective, the effort to move the tomb and burials must still be approved by the Tennessee Historical Commission (who has indicated opposition to the move), the Capitol Commission, as well as a legal proceeding. The Capitol Commission delayed a vote on the relocation until a future meeting, when all members of the commission would be in attendance (Schelzig 2018; State Capitol Commission 2018).

The commission met in December 2019 and February 2020, but there was no discussion of the Polk tomb relocation (State Capitol Commission 2019, 2020). Relocation of the tomb and burials does not pose a risk or prevent the Polk Home from becoming a national park unit, although *NPS Management Policies 2006*, section 5.3.5.4.5 Movement of Historic Structures, prevents the National Park Service from relocating the tomb were the site to become a national park unit. The policy states the National Park Service will not acquire historic structures for relocation to parks unless those structures were removed from the park and are necessary to achieve the park purpose or authorized by legislation. Understanding future decisions regarding a potential relocation will be important when considering associated costs and management and preservation of the tomb.

The Mulehouse is a privately owned music venue located within the same city block of the Polk Home. The venue in its current operation does not pose any threat or risk the site; however, intentions to expand the venue in the future include a potential bar and restaurant as well as hotel. If these intentions move forward into design and construction, conflicts could occur with more day traffic. The proximity to additional noise would be a consideration for the site as it relates to visitor experience and interpretation of the resources.

The structures within the boundary do not have an official resource condition assessment nor an archaeological survey; however, the study team reviewed and noted the condition of each structure within the study boundary. Overall, the site is well maintained and up to date on large maintenance items. A new heating, ventilation, and air conditioning (HVAC) system was installed in 2020 and meets Department of the Interior standards. The historic structures will require ongoing routine and preventative maintenance in order to maintain their historic integrity.

No outside factors hinder the ability to complete such maintenance. Overall, the Polk Home retains excellent historic integrity and shows minimal signs of degradation. More details on structure condition are provided below.

**James K. Polk Home**—Built in 1816, the Polk Home is a two-story painted brick house with a raised basement. The exterior of the residence retains historic integrity from the period when James K. Polk lived with his parents (1818–1824). The Federal-style dwelling is ell-shaped with a side hall and front and rear parlors. Two interior chimneys are located at the gable ends of the building. The front façade is unadorned and includes a simple cornice, five window bays, and a Federal door surround with keystones above each opening. The entrance has recessed molding, pediments, sidelights, and an elliptical glass transom, all typical features of the Federal style. The house has nine-over-nine sash windows with green-painted wood shutters. The gable roof is clad in wood shingles.

Overall, the Polk Home remains in good condition. Beyond routine maintenance, the roofing on the home is nearing the end of its life cycle. The window casings have some chipping paint, and the windows themselves and the exterior stools show signs of constant moisture. In some cases, wood deterioration is also present.

**Sisters' House**—The original house had three bays and a one-story ell to the rear. In 1827, the builder Nathan Vaught added a two-story addition to the east side and a second story to the rear ell. Around 1875, owners reconfigured and enlarged the rooms and added Victorian detail to the interiors. The construction of a detached two-story kitchen occurred around 1890, and a later side porch was added to adjoin the two buildings.

The overall state of the Sisters' House is currently in good condition. A few maintenance items to note include that the enclosed porch “infill” siding shows clear signs of deterioration and some rot. An inspection of the wood suggests that it may not have been properly sealed or primed when it was originally painted, which is evident in the bleed-through of resin around the knots found in the wood. Regular (every five years or so) painting of all wooden exterior elements would further preserve the building's exterior. The windows have some chipping paint on the sills, and the exterior stools are showing signs of constant moisture. In some cases, wood deterioration is present. Some sagging is occurring around a few of the basement window openings, which is evident from the stairstep cracks that can be seen originating from the center of the window wells. The sagging could be addressed by adding a steel lintel to support the brick on the upper portion of the window well. The visitor restroom facilities associated with the Sisters' House need complete replacement of outdated fixtures. Gutters and downspouts would need to be cleaned and repaired, as it is evident that overrun from gutters is a contributing cause to the deteriorating wood siding where present.

**Kitchen**—The outbuildings associated with the Polk Home did not survive. In 1937, a detached kitchen was built on the original foundation of a Polk period outbuilding south of the residence. The kitchen is a one-story brick building with a central chimney and gable roof with wood shingles. The north elevation has an entrance on the eastern end and two nine-over-nine sash windows. The west elevation has a central door. All openings have blind arches. A small brick courtyard and brick wall connects the kitchen to the Polk Home.

The kitchen building is in good condition. Beyond routine maintenance, the roofing on the kitchen is nearing the end of its life cycle and would need to be replaced.



The HVAC system that is in the kitchen has failed; however, the National Park Service would likely not replace the HVAC system, leaving the kitchen in its current unconditioned state.

**Gardens and Garden Cottage**—In the 1960s, the James K. Polk Memorial Association created a garden in the 19th-century style to complement the Federal-style residence, and as additional land was acquired, expanded the gardens to the south of the Sisters' House. Although the formal garden design is not significant, the iron fountain that provides a focal point connecting the Polk Home, Sisters' Home, and kitchen is from Polk Place, the president's personal residence in Nashville. The iron fountain is a scenic enhancement to the property and has not been evaluated as a historic feature. The garden cottage in the southwest corner of the site is a gable-end wood frame structure with a full attic and central chimney. The cottage has two unheated rooms and porch with chamfered posts along the east elevation. The cottage is used for seasonal education programs and storage. The garden cottage was added sometime between 1880 and 1910.

Overall, the garden cottage is in fair condition. The interior of the garden cottage is in good condition; however, the exterior is in poor condition. While the roofing appears to be sound, rotted porch posts and rotted/failed siding would need to be replaced. Additionally, the foundation would need extensive repointing.

**Polk Presidential Hall**—The James K. Polk Memorial Association purchased an 1882 Gothic Revival church on South High Street and opened the Polk Presidential Hall in 2009, after extensive renovation. The church is not associated with James K. Polk and was built long after his death. However, the church does provide a modern facility for exhibits. The building retains integrity to the late 19th-century with the preservation of original materials, workmanship, location, and setting.

The adaptive reuse of the church as an exhibit building provides the Polk Home valuable interpretive space for visitors.

The Polk Presidential Hall is in excellent condition, both on the exterior and the interior, and it can be reasonably maintained by regular cleaning and painting of the exterior elements as well as varnish to preserve the doors. To preserve the building, the basement would require regular cleaning of the storm inlet grate to allow water to enter the sump. The basement currently has a mildew smell as a result of water from storms, which would require some professional cleaning.

**Law Office**—The law office is a concrete rectangular building on South High Street built in 1964. The building does not contribute to the association with James K. Polk, but it does provide a modern facility that could be used for visitor services, administrative offices, and storage. The building is 3,000 square feet and contains closed offices, cubicle space, a break room, and restrooms. The building went through renovations in 2017. The law office is in good condition.

By clearly outlining ownership of the structures under the contract for the provision of management and maintenance with the State of Tennessee, the James K. Polk Memorial Association is eligible to apply for grant funding from the state. The Polk Home has the ability to request financial assistance for preservation from the Maury County Historical Society.

The National Park Service concludes that the site and surrounding property do not have any current or potential threats to the resources that would impact the significant values of the resources. The overall site is maintained in good condition. Based on these findings, the study site meets the feasibility factor based on current land ownership, local planning and zoning, and potential lands uses in the area.

## Access and Public Enjoyment Potential

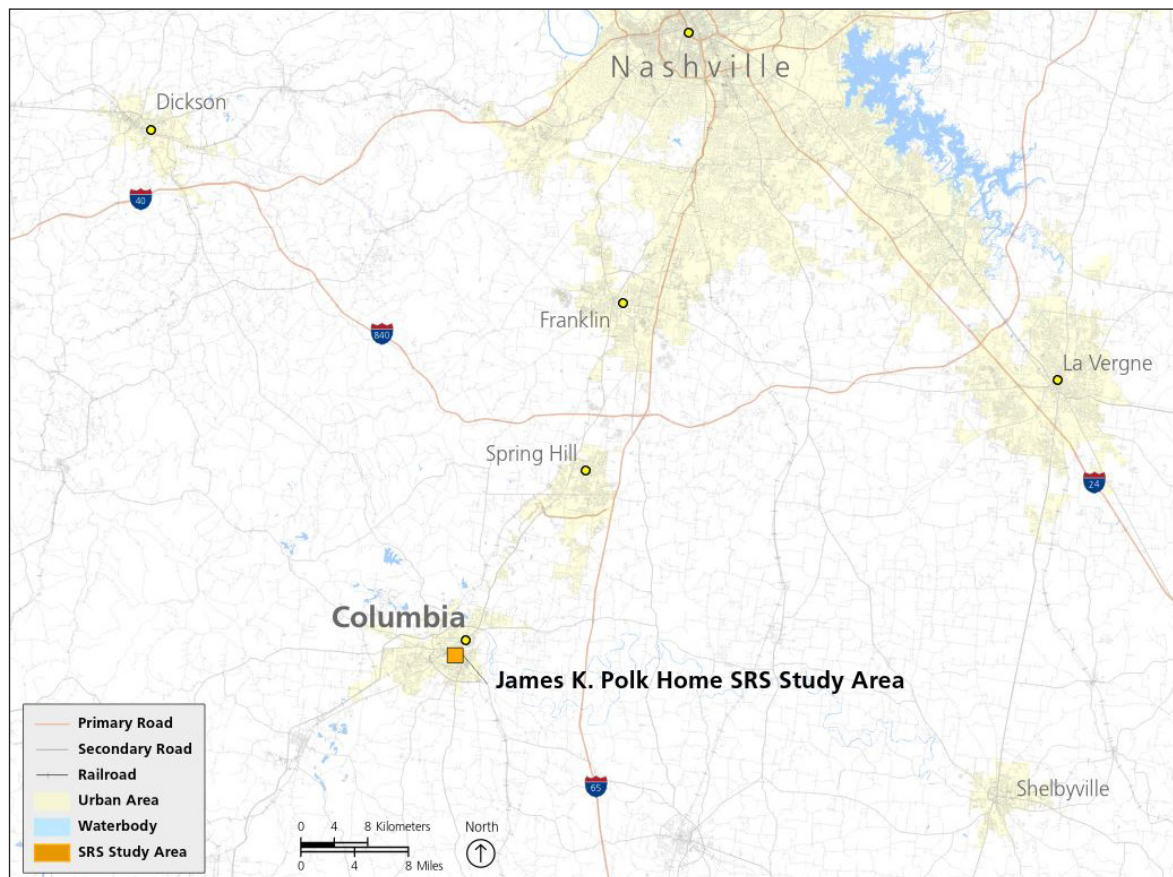
**Access**—The Polk Home and adjacent property is located in Columbia, Tennessee (population approximately 40,000), 45 miles south of Nashville and 75 miles north of Huntsville, Alabama, with access from Interstate 65 (figure 24). The closest major airport is Nashville International Airport. The Polk Home and adjacent property are located approximately two blocks from Town Square, where several shops and restaurants are present within a 1-mile radius of the site. Tourism attractions within Columbia include the Arts District, outdoor recreation along the Duck River, and the presidential history of James K. Polk.

Public transportation is available via the Mule Town Trolley, which offers four regular routes that provide service to Mt. Pleasant, Spring Hill, and around the Columbia area.

These routes run every hour. Columbia is easily navigated by pedestrians with maintained sidewalks and crosswalks.

Visitors typically access the Polk Home using a personal vehicle. The site currently uses approximately 10 public parking spaces, available on High Street. Additional parking is available via a verbal agreement with the Maury County Visitors Center, where recreation vehicles, tour buses, and special event parking can be accommodated. Additional public street parking is available directly in front of the Polk Presidential Hall. Nearby churches and businesses have increased use during evening and weekends, which doesn't interfere with visitation at the Polk Home. The site has adequate parking to accommodate current visitation.

**Figure 24.** Columbia and Surrounding Area Regional Map



**Public Enjoyment Potential**—The James K. Polk Memorial Association administers and operates the site, which commemorates the Polk presidency by displaying artifacts, furnishings, and documents associated with James K. Polk. The home is currently open to the public and offers guided tours of the residence and the kitchen building and self-guided tours of the Sisters’ House, which includes a museum room and gift shop and garden. The Polk Presidential Hall accommodates rotating exhibits. Visitors purchase tickets in the Sisters’ House and watch an introductory film that highlights the Polk presidency and the home site. A variety of interpretive programs have been designed for a range of age groups and topics focused on the life and legacy of James K. Polk.

The accessibility of the site and properties were evaluated using Architectural Barriers Act standards consistent with NPS guidance. The accessibility of the Polk Home is limited by its historic nature. The front entrance has stairs and accessible access is located at the back of the home; however, access to the second floor is not possible without using a staircase. The James K. Polk Memorial Association is currently seeking ways to offer programmatic accessibility through digital materials and other methods. The Sisters’ House is also a historic structure where accessible access is available in the back of the building. The kitchen outbuilding and the garden cottage also have accessibility challenges. The Presidential Hall is fully accessible. As discussed in “Existing and Potential Threats to Resources,” within the context of the proposed boundary, the law office has potential to serve as a visitor center and primary point of entrance allowing visitors to become oriented to the site and plan their visit. The law office in its current state aligns with NPS accessibility standards, which would improve access and visitor experience as the initial entry point to the site. The space also includes additional office space that could be used for administrative offices and collection storage.

The James K. Polk Memorial Association hosts events throughout the year, including educational opportunities, fundraisers, and community events and meetings. Recurring events include a monthly lecture series called Polk’s America (now also available as a podcast), monthly First Fridays (a downtown Columbia initiative in which the James K. Polk Memorial Association hosts pop-up markets in the gardens for local artists and vendors), and the annual Dark Horse Dinner and Polk Garden Gala fundraising events. In addition, education events take place throughout the year for school groups and youth organizations as well as community meetings, author talks and book signings, day camps, gallery walks, and free admission days (NPS Study Team 2021).

### **Public Support and Socioeconomic Impacts of Designation**

**Level of Public Support**—The study team conducted civic engagement to inform the special resource study and assess public support for the potential establishment of a unit of the national park system in Columbia, Tennessee. Due to COVID-19 restrictions, the National Park Service held a virtual public meeting on January 28, 2021. This meeting provided opportunities for the team to inform the public about the special resource study process and gauge community support for a potential new national park system unit. Overall, the meeting was well attended, including members of the local community and the James K. Polk Memorial Association. Additional comments were also collected through individual meetings with the Tennessee State Historic Preservation Officer and a local elected official, both of whom provided general support for a potential NPS designation. A majority of comments received from the general public showed support of a potential NPS designation, while some were opposed. All comments were in favor of preserving the site and keeping it open to the public.

Strong community support exists for the ongoing preservation and stewardship of the site that has been passed on generationally among local residents.

The public cited the great importance of the presidential site and that it should be preserved and protected for the enjoyment of the public and future generations. The public also supports NPS management as a way to enhance tourism and provide job opportunities. General opposition towards designation was due to the site being successfully managed locally in Columbia by the James K. Polk Memorial Association.

The James K. Polk Memorial Association stated their opposition against the transfer of property and management to the National Park Service. However, the association has a strong interest in exploring various options, ranging from an affiliated area to other partnership models between the James K. Polk Memorial Association and the National Park Service that would allow for access to funding, historic expertise, and to gain national prominence for the site (NPS Study Team 2021).

The owners of the law office have previously expressed their support for the preservation of the Polk Home and adjacent properties verbally and were supportive of a possible NPS designation. In addition, the study team met with several neighboring landowners to gauge their level of support. Each landowner was supportive of a potential NPS designation and cited that they regularly coordinate with the James K. Polk Memorial Association to build a sense of community in the area.

The National Park Service concludes there is sufficient access to the study area. Although the entire site is not fully accessible due to the historic status of the structures, a range of opportunities exist to provide for programmatic accessibility.

The site is currently managed in a way that facilitates a range of visitor use activities, which demonstrate adequate access and public enjoyment potential to support the site if it were to become a unit of the national park system.

Civic engagement for this study has demonstrated community support for the inclusion of the site within the national park system. Although the James K. Polk Memorial Association is not supportive of full NPS management, it may support an affiliated area designation or other partnership model.

#### **Economic and Socioeconomic Impacts—**

The economic benefits of national parks are well established, as the National Park Service preserves unique resources for the enjoyment of future generations. Nationwide, visitors to NPS lands purchase goods and services in local gateway regions, and these expenditures generate and support economic activity within those local economies. Such visitor spending is far reaching, directly affecting sectors such as lodging, restaurants, retail, recreation industries, and transportation. The 2020 NPS Visitor Spending Effects Report showed that park visitors spent an estimated \$14.5 billion in local gateway regions while visiting NPS lands across the country in 2020. These expenditures supported an estimated 234,000 jobs, \$9.7 billion in labor income, and \$28.6 billion in economic output to the national economy (NPS 2020).

The State of Tennessee welcomed a total of 9.7 million visitors to their national parks, which resulted in an estimated \$698 million spent in local gateway regions. These expenditures supported a total of 9,460 jobs, \$346 million in labor income, and \$971 million in economic output in the Tennessee economy.

At present, the socioeconomic impact of a new unit of the national park system on the local area is uncertain but is projected to be modest.

Social and economic impacts of a national park system unit designation would vary, depending on the size and scope of the new park, management approach, staffing levels, and especially visitation. Any impacts would accumulate over time as a new unit becomes better established within the national park system. Socioeconomic impacts correlate directly with the number of visitors to a site.

The site is currently open to visitors daily with a general increase of visitation over the past five years, from 11,613 visitors in 2016 to 12,640 visitors in 2019 (table 1), a 33% increase over the five-year period. Lower visitation was recorded in 2020 due to closures from the COVID-19 pandemic. To date, visitation for 2021 has rebounded to similar levels as seen in 2019. Total visitation is recorded annually per the number of visitors attending a tour (paid admissions plus free admission day attendees) and visitors attending special events (e.g., exhibit openings, on-site fundraisers, after-hours educational programs). Although the monthly “Polk’s America” lectures occur off-site at an adjacent church or the nearby library, those audiences are included in this count.

If a new national park system unit were established, general visitation to the site would likely increase; however, the level to which the Polk Home would attract visitors is unknown.

To determine estimated visitation of the Polk Home under NPS management, visitation statistics were analyzed for three established NPS reference sites with one or more of the following attributes: sites with geographic proximity to the Polk Home or sites having similar park characteristics (e.g., presidential home or similar time period). The three sites chosen include the Andrew Johnson National Historic Site (290 miles northeast of the Polk Home), Stones River National Battlefield (48 miles northeast of the Polk Home), and Fort Donelson National Battlefield (95 miles northwest of the Polk Home).

During the most recent five-year period (2016–2020), the Andrew Johnson National Historic Site in Greeneville, Tennessee, averaged 50,000 visitors annually (NPS 2021). Stones River National Battlefield in Murfreesboro, Tennessee, averaged 286,000 visitors annually (NPS 2021). Fort Donelson National Battlefield in Dover, Tennessee, averaged 243,000 visitors annually (NPS 2021). Estimated visitation of the Polk Home could range widely, from the current visitation level of approximately 11,500 visitors per year to 286,000 visitors per year.

Designation of a new unit would likely result in some increased spending in local restaurants, hotels, and retail establishments, and these purchases would generate tax revenues.

**Table 1.** Polk Home Five-Year Visitation (2016–2020)

| Year                              | Tour Participants | Special Activities Participants | Total Annual Visitation |
|-----------------------------------|-------------------|---------------------------------|-------------------------|
| 2016                              | 9,487             | 2,126                           | 11,613                  |
| 2017                              | 9,918             | 1,778                           | 11,696                  |
| 2018                              | 9,534             | 2,403                           | 11,937                  |
| 2019                              | 10,248            | 2,392                           | 12,640                  |
| 2020<br>(closures due to COVID19) | 2,900             | 0                               | 2,900                   |

Source: James K. Polk Memorial Association (visitation data is reported by calendar year).

The economic impact of this visitor spending in small towns, such Columbia, could be noticeable but may not be especially dramatic. Visitation would likely vary over the course of a year, and socioeconomic impacts would therefore be stronger during peak visitation.

In the 2020 *NPS Visitor Spending Effects Report*, the National Park Service estimates the economic “value added” of each unit of the national park system to the economy of the surrounding local area that results from nonlocal visitor expenditures. Value added refers to the incremental, or net, increase in economic output that can be attributed to a particular activity or the price of its final output minus the cost of its inputs (the total of value added in a particular economy equals its gross domestic product). The annual value added for similar sites in 2020 ranged from \$2 million to \$17 million.

Typically, the establishment of a new park unit would also involve the construction of some new visitor and administrative facilities. These construction activities would provide a modest and temporary economic benefit in the form of worker spending or local jobs. At the Polk Home, however, facility construction would likely be minimal in comparison to other national park system units. A new park would also require staff to operate facilities and care for the grounds. Presumably, some employees could be sourced from the local area. Again, job creation would likely be minimal in comparison to larger units of the national park system.

While the impact on the local economy is uncertain, socioeconomic factors would not preclude the designation of a new unit of the national park system. Designation is not expected to result in negative economic impacts, as minimal land and other resources would be diverted from their existing uses to establish the site as a unit of the national park system.

The site would likely generate a small economic benefit due to accommodations, food services, and retail generated as a result of increased visitation to the Polk Home and adjacent property. The overall socioeconomic impact of designation to nearby communities would likely be minimal.

### **Costs and Budgetary Feasibility**

Since the National Park Service has a legislated mandate to conserve resources unimpaired for public enjoyment, the park units it manages would presumably continue indefinitely into the future. However, designation of a new unit of national park system does not automatically guarantee that funding or staffing to administer that new unit would be appropriated by Congress. Any newly designated national park unit would have to compete with the more than 400 existing park units for limited funding and resources within a current fiscally constrained environment (DOI 2021). Study areas that may be nationally significant, suitable, and technically feasible for designation as a new park unit may not be feasible in light of current budget constraints, competing needs across the entire agency, and the existing NPS deferred maintenance backlog.

In a special resource study, analysis of feasibility provides an initial opportunity to understand the magnitude of costs required for acquiring park lands and establishing park operations. The full costs to acquire and sustain the Polk Home and adjacent property as a unit of the national park system are not known at present and would be affected by the level of visitation, requirements for resource preservation, and the desired level of facility development. Projects that would be both technically possible and desirable to accomplish for the new park may not be feasible in light of the constraints noted above.

**Acquisition Cost**—Any future land acquisitions would need to consider larger agencywide and regional priorities for purchasing new park lands. The establishment of a new national park unit by Congress does not guarantee funding or the purchase of lands, and any improvements would require further cost analysis and planning. Any NPS acquisition of private properties would occur only through donation or from a willing seller for the appraised fair market value.

Costs for land acquisition include the property boundary outlined in figure 23 above, which includes the Polk Home and adjacent property, the Polk Presidential Hall, and the law office. In addition to the purchase cost, the National Park Service would incur expenses from conducting full title searches/insurance, completing hazardous material surveys, real estate appraisals, and preparing a legislative map of the property. Assuming that the entire 2.5-acre property and the law office are purchased rather than donated, the acquisition costs are estimated to be approximately \$5.67 million (table 2). The law office estimate is based on the approximate costs in the State of Tennessee Real Estate Assessment Data appraised in 2018. The Polk Home and surrounding parcel estimate was provided by the James K. Polk Memorial Association and is based on current market trends, building costs, and similar property value considering the historic integrity of the site. The cost estimates listed in the table 1 below are not based on actual appraisals and are developed to provide approximate costs for potential purchase of the site from the James K. Polk Memorial Association and the State of Tennessee. In the event of a potential designation, there are possibilities of donation by the James K. Polk Memorial Association and the State of Tennessee.

**Table 2.** Acquisition Cost Estimates by Parcel

| Parcel                            | Estimated Acquisition Costs (2018) |
|-----------------------------------|------------------------------------|
| Polk Home and surrounding parcels | \$5,500,000                        |
| Law Office                        | \$175,400                          |
| Total                             | \$5,675,400                        |

Source: State of Tennessee Real Estate Assessment Data

In addition to the property, the on-site collection of artifacts and archives is a contributing resource to the national significance associated with James K. Polk. The ownership of the collection is split between the State of Tennessee, the Tennessee Historical Society, and the James K. Polk Memorial Association. The term “Polk relics” describes the objects from Polk Place in Nashville that were handed down from the descendants of Sarah Childress Polk, the adopted daughter of Sarah Polk, and presented to “the State.” Site managers and state officials have interpreted “the State” to refer to the Tennessee Historical Society and not the State of Tennessee, but other interpretations are possible with the available evidence. The Tennessee Historical Society’s collection is furthermore permanently deposited at the Tennessee State Museum. The “Polk relics” are managed by a trust agreement between the State of Tennessee and the James K. Polk Memorial Association, which has housed and stewarded the collection since the late 1920s and early 1930s. Other collection items from the Tennessee Historical Society are managed via a long-term loan with the James K. Polk Memorial Association. The James K. Polk Memorial Association owns a small portion of the collection outright through donation and acquisition after its establishment (Candeto 2021; James K. Polk Memorial Association 2019b).

The James K. Polk Memorial Association stewards the entire museum collection which includes Polk family furniture from the White House and Polk Place, items from his presidency, campaign souvenirs, decorative arts, historic documents, and clothing all related to James K. Polk's lifetime. The items within the collection have either belonged to James K. Polk and Sarah Childress or the immediate Polk family, are connected historically or politically to James K. Polk, or fill in the gaps in the interpretation of the Polk's lifestyle. The majority of the collection is displayed and stored at the site, and an inventory is underway to improve understanding of ownership and loan of the collection (James K. Polk Memorial Association 2019b). The most recent appraisal of the collection in its entirety was conducted in 2001 and valued the collection at approximately \$1 million. Additional expenses would be incurred related to acquisition of the collection. Preservation and storage of the collection is completed on-site by the curator, and these associated costs are included in the annual operating budget described in the operating costs section below.

**Development Costs and Total Cost of Facility Ownership**—Development of additions to the national park system vary widely, depending on the existing and desired conditions of the facilities. New national park system units and additions frequently require investment of time and money to inventory and document resources in the unit, develop management or treatment plans for those resources, develop educational and interpretive materials, and develop and improve facilities for visitors and park operations, including facilities that would meet legislative requirements for accessibility.

The condition assessment determined that the buildings and grounds were generally well maintained. Development costs include general maintenance and repairs, such as foundation repointing, window and shutter repair, painting, lock system, and legislatively mandated improvements for accessibility.

Development costs include replacing the public restrooms at the Sisters' House and the law office and installing fire detection and fire suppression systems in the Polk Home and the Sisters' House. The properties do not currently have fire detection or fire suppression, which would be a standard under NPS management for both visitor safety and protection of resources. The restrooms in the law office and Sisters' House are outdated and would require replacement in order to provide adequate visitor facilities. Current assumptions for the law office include keeping the interior in its current layout. The only renovation would be to the restroom facilities, which would result in demolishing portions of the slab and plumbing revisions to support the adequate number of fixtures. Additional improvements include foundation repointing, exterior paint, and lock system. The cost estimates represented in table 3 are based on the condition assessment conducted in summer 2021, including design costs of 5% pre-design, 10% design, and 2% supplemental, for a total of 17%. In addition, the estimates include an additional 5% for compliance, 8% for NPS management of the projects, and 10% construction contingency. The site is equipped with educational waysides outside of the Polk Home, educational programming, including a welcome video, interpretive materials for tour groups, and a gift shop. The study team anticipates that additional development and fabrication and installation of educational and interpretive materials would be included in the initial construction cost. Table 3 below shows a summary of the estimated development costs by site. Development costs are estimated to be \$3,010,004.

Total cost of facility ownership (TCFO) analysis estimates life cycle costs of a physical asset, including all activities that occur over its lifetime and the organizational resources and capacity required to perform those activities. The TCFO calculator estimates life cycle costs based on the square footage, current condition, and number of systems in each building and includes inflation rates for the life cycle.



**Table 3.** Development Costs and 50-Year Total Cost of Facility Ownership, November 2021

| Site                   | Square Footage | Estimated Development Costs | 50-Year Life Cycle Costs | 50-Year Total Cost of Facility Ownership |
|------------------------|----------------|-----------------------------|--------------------------|--|
| James K. Polk Home     | 1,872          | \$721,993                   | \$1,947,177              | \$2,669,170                              |
| Sisters' House         | 2,300          | \$722,225                   | \$2,435,031              | \$3,157,256                              |
| Polk Presidential Hall | 2,600          | \$255,402                   | \$2,551,802              | \$2,807,204                              |
| Kitchen                | 740            | \$130,959                   | \$201,453                | \$332,412                                |
| Garden Cottage         | 520            | \$422,807                   | \$252,173                | \$674,980                                |
| Law Office             | 3,000          | \$467,810                   | \$2,949,354              | \$3,417,164                              |
| Landscape              | N/A            | \$88,808                    | \$1,787,219              | \$1,876,021                              |
| Educational Waysides   | N/A            | \$200,000                   | \$50,000                 | \$250,000                                |
| Total                  | 11,032         | \$3,010,004                 | \$12,174,209             | \$15,184,213                             |

The estimated costs summarized in table 3 are based on the current condition assessment. The estimated costs assume the National Park Service would contract directly with construction firms for development costs and the long-term maintenance of the buildings and grounds. In addition to development costs, table 3 shows the life cycle costs over a 50-year period, yielding the \$12,174,209 as the 50-year total cost of facility ownership by site. The estimated total costs of facility ownership under the proposed boundary of the site are \$15,184,213 for development costs under a 50-year life cycle.

**Operational Cost**—Operating costs vary widely among units of the national park system, depending on the types and quantities of resources managed, the number of visitors, the level of programs offered, safety and security issues, and many other factors. At a minimum, the operating costs of the Polk Home would include grounds maintenance, utilities, communications, staffing personnel, and other miscellaneous expenses. Personnel would be required to design and deliver programming (e.g., personal interpretation, exhibits, special events), conduct maintenance of the facilities and grounds, perform administrative functions (e.g., budget, management,

planning and compliance), provide law enforcement (if necessary), and conduct outreach to the community and schools.

As discussed above, if new legislation is introduced and passed in the future to relocate the James K. Polk and Sarah Childress tomb and burials from the Tennessee State Capital before the site is potentially designated a national park unit, additional costs would be associated with maintenance and security of the tomb within the garden area. Potential operating costs are uncertain at this time.

The collection of items associated with James K. Polk would require annual funding to manage, display artifacts within exhibits, and overall conservation of the collection. Currently, adequate on-site space and facilities exist for storage and exhibit display of the collection. The James K. Polk Memorial Association has allocated between \$14,000 to \$42,000 annually for exhibits and conservation of the collection. Future costs associated with conservation and display of the collection under NPS management is estimated to be approximately \$50,000 per year, plus the cost of an on-site curator dedicated to this site, which would be approximately \$80,000 per year.

To estimate the potential costs of operating the Polk Home as a new unit of the national park system, the National Park Service reviewed annual operation costs from units of the national park system that are of similar size and with comparable facility assets. It is important to note that these comparable units are established and have been operating as national park units for some time. These units include First Ladies National Historic Site, General Grant National Monument, John Fitzgerald Kennedy National Historic Site, Theodore Roosevelt Birthplace National Historic Site, Theodore Roosevelt Inaugural National Historic Site, President William Jefferson Clinton Birthplace National Historic Site, and William Howard Taft National Historic Site. The comparable sites listed in table 4 have on average 5–8 full-time employees, with annual operating budgets ranging from approximately \$480,000 to \$1.1 million. These costs include staffing (part-time and seasonal employees), as well as programming, collection conservation, maintenance, security, communications, and administrative costs. Funding for a new unit of the National Park Service would be carefully weighed with current agencywide limitations and funding constraints.

In addition to considering operating costs from other national park system units, another good measure for consideration is the annual operating budget of the Polk Home. The annual operating budget of the Polk Home over the last five-year period (2015–2019) averaged approximately \$360,000. The James K. Polk Memorial Association conducts fundraising that directly contributes to the annual budget. The James K. Polk Memorial Association requires that professional staff be present whenever the site is open to the public. The site currently operates with three full-time positions (the executive director, curator, and education and programming coordinator) and six part-time guest services associates.

Under NPS management, the annual operating costs are expected to increase from the current levels under the James K. Polk Memorial Association. Additional staff would be required for management of the park unit and resources. Over a 50-year life cycle, the annual facility maintenance costs would average approximately \$250,000 per year. At a minimum, staff would include a park superintendent, curator, education and interpretation staff, law enforcement, and administrative officer for an annual estimate of \$400,000.

**Table 4.** Fiscal Year 2006–2020 Annual Operating Costs at Comparable Units of the National Park System

| Unit of the National Park System   | Annual Operating Costs (2006–2020 Average) |
|--|--|
| First Ladies National Historic Site  | \$1,042,000                                |
| General Grant National Monument  | \$877,000                                  |
| John Fitzgerald Kennedy National Historic Site                             | \$562,000                                  |
| Theodore Roosevelt Birthplace National Historic Site                       | \$708,000                                  |
| Theodore Roosevelt Inaugural National Historic Site                        | \$480,000                                  |
| President William Jefferson Clinton Birthplace Home National Historic Site | \$620,000                                  |
| William Howard Taft National Historic Site                                 | \$902,000                                  |

Source: 2006–2020 NPS Facility Management Data Set

The collection would require an annual budget to maintain the collection and organize display of the collection, estimated to be approximately \$50,000. Yielding total annual expenses for staffing, total cost of facility ownership, and the collection, the annual operating budget could reasonably range from \$700,000 to \$1,100,000, based on the current condition of the assets and anticipated visitation.

While the estimated costs of acquisition, development, and operations associated with the Polk Home would be modest in comparison to larger units of the national park system, any new expenditures would need to be carefully weighed in the context of the agency's existing maintenance backlog and other fiscal constraints and in terms of potential future visitation.

**Partnerships**—The James K. Polk Memorial Association expressed support in exploring an affiliated area of the national park system or another partnership model. The current management includes the executive committee, which consists of appointed members that facilitate hiring staff, providing oversight, and planning, such as approval of the annual operating budget and decision-making of overall management and operations. Additional partnership and management options are discussed below under “Evaluation of the Need for Direct NPS Management.”

If the site were designated a national park unit, the National Park Service could pursue partnership opportunities related to the curation and exhibition of the James K. Polk museum collections. The National Park Service could also pursue a formal agreement with the James K. Polk Memorial Association and/or the Tennessee State Museum for the care and storage of the site collection or for artifact loans for future exhibits at NPS facilities. By partnering with the Tennessee State Museum, the National Park Service would align with the agencywide curation

goal of combining federal repositories and using existing facilities that meet NPS curation standards. Under a potential partnership with the James K. Polk Memorial Association to continue managing the collection, these costs could decrease. Future NPS planning efforts, such as a partnership plan, general management plan, or park memoranda of understanding, could formalize these relationships and activities.

As a result of agencywide priorities, it would likely take several years for the National Park Service to fully staff and operate any newly designated national park unit. Overall costs and budgetary considerations associated with the acquisition, facility development and rehabilitation, and operations of the James K. Polk Home site are projected to be modest in comparison to the majority of national park system units but will add to the overall costs of the National Park Service, nonetheless.

### **Feasibility Finding**

The study area meets all of the factors considered under the analysis of feasibility. It is of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment. Current land ownership patterns, economic and socioeconomic impacts, and potential threats to the resources do not appear to preclude the study area from potentially becoming a new unit of the national park system. Although the James K. Polk Memorial Association is more supportive of an affiliated area or partnership model, there appears to be sufficient local support for inclusion of the study area within the national park system and public satisfaction with the current onsite visitor opportunities. The site would not require substantial new infrastructure to support visitation and to meet the standards of a national park system unit. The special resource study concludes that the Polk Home and adjacent property is considered feasible for inclusion in the national park system.

As evidenced by the National Park Service's current repair backlog, the agency has greater demands for cyclic and recurring maintenance than the funding that is currently available. The addition of the Polk Home would likely further dilute these funds; therefore, the feasibility of the National Park Service serving as the only entity managing the site as a unit into the national park system is dependent on NPS fund source managers' ability to prioritize cyclic and recurring maintenance projects to meet the requirements of the facilities within this potential new unit. Further, the costs associated with acquisition, potential development, and operations of the Polk Home represent a reasonable investment, considering the current management model under the James K. Polk Memorial Association. The site does not require substantial new infrastructure beyond additional restrooms to be preserved and operated under the National Park Service. Annual funding would be used to support recurring maintenance of the properties as well as staff personnel. Considering the National Park Service's maintenance backlog, potential options to engage in partnerships with the James K. Polk Memorial Association for joint management should be explored. The study area could be effectively administered by the National Park Service at a reasonable cost, depending on fund source availability and considered feasible under this factor.

Completion and transmittal of the study does not guarantee establishment of a unit of the national park system or future funding for any NPS actions at the Polk Home. Even if a unit is established, while new national park system units share common elements, each park unit requires a distinct organizational structure. The organizational structure may be influenced by the unit's enabling legislation or proclamation, its size, resources, scope and delivery of public programming, and its location. National Park Service units are not considered operational (prepared to welcome visitors, preserve resources, and provide programming and services on a regular basis) until they receive an operating appropriation from Congress, which can take years.

## EVALUATION OF THE NEED FOR DIRECT NPS MANAGEMENT

The fourth criterion in the special resource study evaluation process addresses whether the study area requires direct management by the National Park Service instead of protection by another public agency or the private sector. National Park Service *Management Policies 2006* (section 1.3.4) further requires direct NPS management not only to be needed but that its management be "the clearly superior alternative." Inclusion in the national park system would provide a study area with the stewardship mandate defined in the NPS Organic Act,

*... which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations, ...*

There may be a need for direct NPS management if current or potential management entities cannot provide opportunities for resource stewardship or public enjoyment. Unless direct NPS management is identified as the clearly superior alternative, the National Park Service recommends other existing organizations or agencies continue resource management responsibilities, and the study area is not recommended for inclusion as a new unit of the national park system

In the context of a special resource study, "direct NPS management" means the National Park Service owns or manages lands within an authorized park boundary and has lead responsibility for park operations, resource protection, and visitor services. This level of management provides NPS sites with a dual mandate of resource preservation while providing opportunities for visitor enjoyment.

“Clearly superior” is understood to mean that the National Park Service could provide optimal resource protection and visitor opportunities when compared to current management or other management scenarios. In this section, management by public and private entities is evaluated to determine if these entities can effectively and efficiently provide long-term resource protection and visitor services or if direct NPS management is the clearly superior option.

### Summary of Existing Management

The Polk Home and adjacent property (except for the law office) is currently managed by the James K. Polk Memorial Association (the association). The association, founded in 1924 by descendants of Sarah Childress Polk, is responsible for the management and maintenance of the state-owned portions of the property. The association is a 501(c)(3) nonprofit organization governed by a board of directors. The board oversees site operations and determines policy, and the professional staff is responsible for day-to-day operations. The board of directors is composed of the executive committee and the chairmen of the standing committees. The staff is composed of three full-time positions (the executive director, curator, and education and programming coordinator) and six part-time guest services associates. The association’s statement of purpose is “to operate, maintain, preserve, and restore the Polk Ancestral Home and properties, its grounds and appurtenances, and to perpetuate the memory of the eleventh President of the United States.”

Under current management, the home is open to the public for guided tours of the Polk residence, the kitchen building, and self-guided tours of the Sisters’ House, which includes a museum room, gift shop, and garden. The site has 10,000–13,000 visitors annually. The Polk Presidential Hall accommodates rotating exhibits that visitors can also access.

Visitors purchase tickets in the Sisters’ House and watch an introductory film that highlights the Polk presidency and the home site. A variety of interpretive programs have been designed for a range of age groups and topics focused on the life and legacy of James K. Polk. The association hosts a variety of events throughout the year, including educational opportunities, fundraisers, and community events and meetings. Recurring events include a monthly lecture series called Polk’s America (also presented as a podcast), monthly First Fridays (a downtown Columbia initiative in which the James K. Polk Memorial Association hosts pop-up markets in the gardens for local artists and vendors), and the annual Dark Horse Dinner and Polk Garden Gala fundraising events. In addition, education events take place throughout the year for school groups and youth organizations as well as author talks and book signings, day camps, gallery walks, and free admission days. The site has had an upward trend in visitation (table 41) as well as increased revenue over the past five years (a 38% increase in revenue from 2015 to 2020). The association receives grants for approximately \$39,000 each year from the State of Tennessee, which covers a portion of staff salaries. The association is also eligible for additional state grant opportunities because the Polk Home is a National Historic Landmark (NHL) (see “Current NPS Program Support”).

The James K. Polk Memorial Association stewards the entire museum collection, which includes Polk family furniture from the White House and Polk Place, items from Polk’s presidency, campaign souvenirs, decorative arts, historic documents, and clothing, all related to Polk’s lifetime.

An NPS assessment of the site concluded that the site is well maintained and up to date on large maintenance items. A new HVAC system was installed in 2020, which meets Department of the Interior standards. Overall, the resources at Polk Home retain excellent historic integrity and show minimal signs of degradation.

### **Current NPS Program Support**

The Polk Home was designated a National Historic Landmark on July 4, 1961. The NHL program—which oversees the almost 2,600 properties designated National Historic Landmarks by the Secretary of the Interior—is administered by the National Park Service and works to preserve the stories of nationally important historic events, places, and people by helping protect the historic character of National Historic Landmarks. Designation of a property as a National Historic Landmark does not change the ownership of the property or private property rights granted to the landowner(s), but NHL status provides an additional level of protection against incompatible federally funded development projects. National Historic Landmark program representatives monitor the condition of NHL properties to ensure impacts from actions funded, licensed, or initiated by federal agencies that may harm nationally significant resources associated are considered during the federal compliance process.

The NHL program reviews federal undertakings as part of the National Historic Preservation Act, section 106, consultation and may suggest modifications that avoid, minimize, or mitigate actions that affect National Historic Landmarks. As a designated National Historic Landmark, the Polk Home is currently part of this program and receives this level of federal monitoring and protection.

Additional benefits of the National Historic Landmark program, which the association does not currently use, include access to NPS expertise and funding opportunities. National Historic Landmark program representatives can provide interested NHL owners with information on a variety of preservation subjects and connections to preservation experts. The National Park Service can also provide technical assistance in the form of property condition information and site inspections when funding allows.

National Historic Landmark owners are also encouraged to apply for grants, tax credits, and other state and federal funding opportunities available through the program to maintain the site's historic character.

### **Continue Existing Management**

With support and partial funding from the State of Tennessee, the James K. Polk Memorial Association protects and maintains the site. As discussed above, the association is currently providing sufficient resource protection and opportunities for visitor enjoyment.

In theory, direct NPS management could expand resource protection, ensure the area is managed according to federal mandates and NPS policies, and expand interpretation, which could be beneficial for long-term site protection and management; however, developing a new unit of the national park system is a slow process. If the Polk Home and adjacent property was established as a new unit, it may take over a decade to begin federally funded projects or hire site-specific staff based on the precedence of other recently established units.

During outreach, approximately one-third of comments received regarding designation were opposed to direct NPS management of the site. A common sentiment was that the site should be managed by the association locally in Maury County, Columbia. Those opposed to NPS designation commented that the site is currently being managed effectively, and commenters had concerns about moving the site from local to national management. Comments noted that special events and fundraising under current management are important aspects of the local community and that these should not be discontinued. Comments included hesitation that the federal government would change the site, taking away from the local feeling.

Considering potential partnership models with the National Park Service, the Polk Home Board of Directors stated that they are least interested in direct NPS management and ownership of the site and most interested in increased NPS support (e.g., funding, technical expertise) without any change in management of the site.

The current nonprofit entity, in partnership with the State of Tennessee, has more flexibility in the management and development of the site than would be allowed to the National Park Service if the site was federally owned. A significant amount of grant money from the state contributes to access to funding for maintenance and capital improvement costs. The nonfederal management entities would maintain access to NPS technical experts, grant opportunities, and preservation communities through their participation in existing NPS programs. As a result of this, the current level of resource protection and site interpretation appears sufficient to support future visitor experiences and maintain the historic resources in their current condition.

### **Need for Direct NPS Management Finding**

Based on the analysis of the existing management currently operating the Polk Home, direct NPS management of the site is not needed. Direct NPS management of the Polk Home could offer sustained resource protection and broad interpretive offerings associated with the National Park Service, but the James K. Polk Memorial Association, in partnership with the State of Tennessee, is currently providing adequate resource protection and visitor access to the site to support public enjoyment. Given the ongoing and successful work of the James K. Polk Memorial Association, NPS management would not be considered a “clearly superior alternative.” The site is already eligible to receive NPS technical support through the National Historic Landmark program. Given these opportunities, the study team determined that full NPS management would have limited additional benefit.

The level of protection and visitor opportunities provided by the current management entities appears sufficient; therefore, the site does not demonstrate a clear need for direct NPS management.

### **POTENTIAL RECOGNITION AS A NATIONAL PARK SERVICE AFFILIATED AREA**

Being added as a unit to the national park system is only one of many options for managing a site(s), and the National Park Service operates several programs that help others preserve natural, cultural, and recreational areas outside of the park system. Despite the negative study finding for the fourth legislatively mandated criterion, the National Park Service recognizes the public support and a potential opportunity for enhancing the interpretation and preservation at the James K. Polk Presidential Home. In cases where resources meet special resource study criteria for national significance and suitability but do not meet other criteria for inclusion in the national park system, an alternative designation such as an affiliated area can apply.

#### **Affiliated Area**

Affiliated areas are sites that are managed and owned by others but for which the National Park Service provides assistance under the terms of a formal agreement. Affiliated areas are not units of the national park system, but affiliated area designation recognizes the significance of an area’s resources and affirms that they are being managed consistently with standards that apply to National Park Service units. Due to the positive finding in the SRS evaluation of national significance and suitability, the Polk Home could potentially qualify for recognition as an NPS affiliated area. Affiliated area status has the potential to provide a higher level of NPS support and the possibility of federal funding, depending on the formal agreements developed between the National Park Service, current property owners, and other supporting entities.

Such a designation would recognize the national significance of the Polk Home and could provide a venue for continued NPS engagement and support in the long-term stewardship of the site.

These related areas are established by Congress or through administrative action of the Secretary of the Interior under the authority of the Historic Sites Act of 1935; however, unlike the majority of units of the national park system, these sites are not federally owned or directly managed by the National Park Service. The role of the National Park Service in the management and administration of affiliated areas is typically outlined in the designation legislation or secretarial action and vary from strong partnerships with NPS staffing to occasional programmatic assistance. Federal funding for affiliated areas is determined on a case-by-case basis. Affiliated areas established through legislative means may receive base funding for staffing and/or interpretation and operations through the Department of Interior just like federally owned and managed units of the national park system. Areas established through administrative action may only receive direct federal funding if Congress specifically appropriates funding for that site. Other affiliated areas receive no federal funding; their primary connection to the National Park Service is through technical assistance.

The paths used to create affiliated areas are as varied as their receipt of federal funding. Thus far, 25 existing affiliated areas have been primarily established legislatively, while 4 have been established through administrative action. In some cases, such as with Thomas Cole National Historic Site, affiliated areas have been designated after the completion of a special resource study.

Other historic sites that were designated affiliated areas were later redesignated as units of the national park system, as in the cases of Port Chicago Naval Magazine National Memorial and the Belmont-Paul Women's Equality National Monument. Oklahoma City National Memorial was initially designated a unit of the national park system to be managed as a partnership park and was later redesignated as an affiliated area. Most recently, Parker's Crossroads Battlefield in Tennessee was established as an affiliated area by Public Law 116-9 in 2019.

To be eligible for affiliated area status, NPS *Management Policies 2006* state the potential area's resources must (1) meet the same standards for significance and suitability that apply to units of the national park system; (2) require some special recognition or technical assistance beyond what is available through existing NPS programs; (3) be managed in accordance with the policies and standards that apply to units of the national park system; and (4) be assured of sustained resource protection, as documented in a formal agreement between the park service and the nonfederal management entity. This special resource study has determined that the Polk Home is nationally significant and is considered suitable for inclusion in the national park system and thereby meets the first two eligibility criteria for affiliated areas.

Any action to establish the Polk Home and adjacent property as an affiliated area would guide the development of any subsequent formal partner agreements between the nonfederal site managers and the National Park Service necessary to meet eligibility as an affiliated area.



## **SPECIAL RESOURCE STUDY FINDINGS AND CONCLUSION**

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The James K. Polk Presidential Home Special Resource Study finds that the Polk Home and adjacent property does not meet all four criteria to be considered for inclusion in the national park system. Although the study area meets criterion 1 (national significance), criterion 2 (suitability), and criterion 3 (feasibility), the study finds that the Polk Home and adjacent property do not meet established need for direct NPS management criteria for new park units. The James K. Polk Memorial Association, in partnership with the State of Tennessee, is currently providing adequate resource protection and visitor access to the site to support public enjoyment and the site is already eligible to receive NPS technical support through the NHL program.

As a designated National Historic Landmark, the Polk Home possesses cultural resources that are nationally significant. The house retains integrity and is the most closely associated residence with James K. Polk, since it is the only surviving property, outside of the White House, in which he resided. In addition to national significance and because the site also meets the suitability criterion, the home could potentially qualify for recognition as an NPS affiliated area. Affiliated area status has the potential to provide a higher level of NPS support and the possibility of federal funding, depending on the mechanism used to establish the affiliated area and the formal agreements developed between the National Park Service, current site managers, and other supporting entities. Such a designation would recognize the national significance of the home and could provide a venue for continued NPS engagement and support in the long-term stewardship of the site. If affiliated area recognition is pursued, a formal agreement between the National Park Service and the James K. Polk Memorial Association as the nonfederal management entity would be required. This agreement would establish a formal partnership between the National Park Service and the association, ensuring sustained protection and visitor access to the resources within the study area.

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## CHAPTER 4: PUBLIC OUTREACH

### OVERVIEW OF PUBLIC OUTREACH

The National Parks Omnibus Management Act of 1998 requires that each special resource study “shall be prepared with appropriate opportunity for public involvement, including at least one public meeting in the vicinity of the study, and after reasonable efforts to notify potential affected landowners and State and local governments.” The National Park Service made a diligent effort to engage interested and affected individuals, groups, and agencies during the preparation of this study but was not able to hold an in-person public meeting in the vicinity of the site due to the COVID-19 global pandemic. National Park Service personnel, in partnership with the James K. Polk Memorial Association and other organizations, planned and conducted virtual public outreach aimed at sharing information about the special resource study process and collecting information that would inform the findings of the study. The National Park Service solicited public input on a variety of topics, including current management of the study area and ideas for future resource protection and visitor enjoyment. This outreach also helped the National Park Service assess the level of local support for adding the Polk Home to the national park system. Public outreach efforts conducted as part of this study are described in this section.

### NOTIFYING THE PUBLIC

The National Park Service initiated the special resource study of the Polk Home and adjacent property in Columbia, Tennessee, in late 2019. In the initial steps of the process, the study team gathered information regarding the site and met with key stakeholders on site. In January 2021, the study team initiated a civic engagement process to inform the special resource study.

During the civic engagement process, the National Park Service solicited feedback from the public through a newsletter, story map, the project website (<https://parkplanning.nps.gov/polksrs>), and a virtual public meeting, which was advertised through a press release in local and regional media. The study team emailed notifications regarding the virtual public meeting and public comment period to the Tennessee Historical Society, the Tennessee State Museum, the Tennessee State Historic Preservation Officer, the Tennessee Historical Commission, and the President James K. Polk State Historic Site in North Carolina.

The James K. Polk Memorial Association (association) posted announcements on Facebook and Instagram and sent email notifications to their members, local government, museum stakeholders, and Polk’s America Lecture and Podcast Series distribution list. They also mailed approximately 600 hard copies of the newsletter in early March 2021 to members of the Association. The newsletter included an overview of the site, a description of the study, the criteria used in special resource studies, and an invitation to submit comments via the project website or mailed correspondence.

The official public comment period opened on Tuesday, January 19, 2021, and closed on Saturday, March 20, 2021. The study team hosted one virtual public meeting on January 28, 2021, via the Microsoft Teams Live platform. The meeting was held from 7:00 p.m. to 8:30 p.m. (ET). The goals of the meeting were to share information regarding the purpose and process for special resource studies, provide an overview of the criteria the National Park Service applies when conducting special resource studies, provide an overview of the site and current management, and seek feedback from the public.

A project website was created on the Planning, Environment, and Public Comment (PEPC) site (<http://parkplanning.nps.gov/polksrs>) to share project updates and information regarding the virtual public meeting and collect public comments.

### **SITE VISITS TO THE POLK HOME AND ADJACENT PROPERTY**

From December 9–11, 2019, the National Park Service took part in a site visit of the study area. A variety of individuals and organizations took part in and supported this visit, including the James K. Polk Memorial Association, the Tennessee Historical Commission, the Tennessee Historical Society, and the Tennessee State Museum. The site visit included a tour of the Polk Home and adjacent property, a visit to the Polk tomb at the state capitol, and a visit to the Tennessee State Museum collections.

After the public commenting period, the National Park Service undertook a second site visit on July 27–29, 2021, to examine specific features of the Polk Home and adjacent property for feasibility and further discuss and evaluate the level of local support. The National Park Service met with individuals from the James K. Polk Memorial Association; the Tennessee Historical Commission; the owners of nearby businesses, such as the Mule House; and the Moulner and Molder law office

### **PUBLIC INFORMATION MEETING**

The National Park Service hosted one virtual public meeting on January 28, 2021, via the Microsoft Teams Live platform. The meeting was held from 7:00 p.m. to 8:30 p.m. (ET). The goals of the meeting were to share information regarding the purpose and process for special resource studies, provide an overview of the criteria the National Park Service applies when conducting special resource studies, provide an overview of the site and current management, and seek feedback from the public.

The meeting began with a presentation about the study process and the history of the site and President James K. Polk. At the end of the meeting, an open question and answer session was held in which members of the public could submit questions to the National Park Service. Approximately 23 people attended the virtual public meeting. The National Park Service received questions and comments from the virtual public meeting attendees and addressed questions and comments in real time. Attendees were also encouraged to also submit their comments to the project's PEPC site.

### **PUBLIC COMMENTS**

The National Park Service posed three questions on the project website:

1. What is your vision for preserving the James K. Polk Home and how would you like the site to be managed? What types of activities and experiences do you want to see as part of the Polk Home's future?
2. What objects, buildings, remaining features, values, and stories do you believe are most important at this site and why?
3. Do you have any other ideas, comments, or concerns you would like to share with us, including your level of support for a potential NPS designation?

These questions were also presented in the mailed newsletter and during the virtual public meeting. The official public comment period opened on Tuesday, January 19, 2021, and closed on Saturday, March 20, 2021.

During the public comment period, 56 respondents submitted comments to the study team. Of these, 51 were submitted through PEPC, 4 were submitted during the virtual public meeting, and 1 was emailed to the study team. National Park Service staff entered the correspondences submitted during the virtual public meeting and the emailed correspondence into the PEPC website.

**Table 5. Geographic Distribution of Correspondences**

| State  | Percentage | Number of Correspondences |
|--|------------|---------------------------|
| Tennessee  | 83.9%      | 47                        |
| Unknown ( <i>captured during virtual meeting</i> ) | 7.1%       | 4                         |
| Florida  | 1.8%       | 1                         |
| Illinois   | 1.8%       | 1                         |
| Maryland   | 1.8%       | 1                         |
| North Carolina                                     | 1.8%       | 1                         |
| Pennsylvania                                       | 1.8%       | 1                         |
| Total  | 100.00%    | 56                        |

Public comments were submitted from individuals in six states and four unknown locations. The following table provides the distribution of public comments that were submitted directly to the PEPC website (table 5).

In addition to general public comments, the National Park Service received comments from two great-great-great-nephews of James K Polk, as well as the following organizations:

- James K. Polk Memorial Association
- Heritage Bank & Trust
- Maury Regional Medical Center
- Workpress Collectives

The National Park Service received one letter from an official representative of

- Maury County Government

**What We Heard**

The following question was posed in the newsletter and on the project website:

1. What is your vision for preserving the James K. Polk Home and how would you like the site to be managed? What types of activities and experiences do you want to see as part of the Polk Home’s future?

The National Park Service received valuable comments that helped inform the special resource study findings. The summary below synthesizes the comments submitted online and by email.

**Vision for Preserving the James K. Polk Home and Site Management**—General comments for preserving the site included support of similar management as to what is currently being done and maintaining the site for future generations to enjoy. Comments showed support for preserving the site and displayed great pride in sharing the home and resources with the local community and tourists. The public comments demonstrated both support and opposition for a national park designation and also suggested a joint management option for preserving the site into the future.

**Support for NPS Designation**—Approximately two-thirds of comments received were in support of NPS designation. The public cited great importance of the presidential site and that it should be preserved and protected for the enjoyment of the public and future generations under NPS management. Supporters thought there would be additional stability to manage the site into perpetuity and noted that it is becoming increasingly difficult to secure adequate funding through grants and fundraising.

Others noted that an NPS designation would bring credibility and visibility for the home as a historic site.

A few comments received mentioned that NPS designation could make the site higher profile and bring in additional tourism to the area. One comment noted that an NPS designation would play a big role in marketing the local community nationally while providing additional opportunities for federal employment.

Commenters who were supportive of an NPS designation stated that without NPS management, the site would be lost or destroyed. Commenters noted the challenges in securing funding for operations, preservation, and programming, recruiting volunteers to keep the association running, and a loss of support from the State of Tennessee to support the site. A stagnation of visitation and admissions were noted, and it was hoped by some commenters that being included as a unit in the national park system would increase the site's relevance.

Some commenters mentioned the National Park Service's experience and professionalism in managing other sites, developing educational programming, and finding traveling exhibits as a benefit to the Polk site in addition to the National Park Service being a secure funding source. Commenters wrote that park designation would bring visibility and credibility to the historically important site. Finally, many commenters who were in support of NPS designation and management frequently identified themselves as current or former association board members.

Other commenters tentatively supported NPS designation and inclusion because of their understanding of Polk's national significance as well as the association's financial constraints, but they would prefer that the association continue managing the property. One commenter suggested a two- to three-year phased transition to achieve public and private support.

### **Opposition to NPS Designation—**

Approximately one-third of comments received regarding designation were opposed to direct NPS management of the site. Commenters said the association should manage the site locally in Columbia within Maury County. Those opposed commented that the site is currently being managed effectively, with concerns of the site moving from local to national management.

The public expressed concerns regarding current special events and fundraising as being important aspects of the local community. Comments included hesitation that the federal government would change the site, taking away from the local feeling. Commenters stated that the members of the association and volunteers were coming up with new ideas for interpretation and activities, and local fundraising was sufficient to protect the site and maintain programming. Commenters also felt that the site was uniquely personal and local (i.e., the site is operated by members of the community for the community). Many commenters in opposition to NPS designation mentioned the site does not need another level of bureaucracy or federal red tape, nor did these commenters trust the federal government.

One commenter noted that the site was not truly James K. Polk's home but the home of his father. Others, in their opposition, pointed to examples such as the Gordon House along the Natchez Trace Parkway, which shows deterioration, and the backlog of deferred maintenance within the National Park Service. There were also concerns expressed that the current Polk Home employees would lose their jobs if an NPS designation were made. Changes or limitations to operating hours, programming, educational focus, tours, and special events without local input were also causes of concern. State ownership of the site was suggested if the association could no longer continue to preserve and operate the site.

A few commenters who were not supportive of the nomination stated that previous federal government shutdowns have hurt other NPS sites, and future radical shifts in NPS priorities and policy, as has been seen in the last few years, would hurt the Polk Home. Additional commenters were concerned about the personal politics of NPS employees impacting operations, interpretation at the site wandering into “*revisionism and political/cultural posturing*,” the demonization of Polk along with other prominent past presidents, and the site becoming a target for “*radical revisionist insurrectionists*.” An example of this last concern was Charles Pinckney National Historic Site. The commenter was also concerned about security at the Polk Home if it received NPS designation.

**Affiliated Area**—About 20 comments mentioned a partnership approach between the local community and the National Park Service for long-term management. The comments identified a vision of a collaborative agreement with the National Park Service in which management and operations of the site would remain the responsibility of the association. As an affiliated area, comments received indicated that it was important for the local community to retain control with financial and technical support from the National Park Service. Some comments suggested that if the designation occurred, a phased transition to the National Park Service would be ideal.

Suggestions for cooperative management between the National Park Service and the association included retaining local control and programming with financial and technical assistance from the National Park Service; the National Park Service supplying an advisor or member to the association board; the properties being owned and operated by National Park Service but educational programming and volunteers being provided by the association; and establishing a friends group relationship with the association.

**Activities and Experiences at the Polk Home**—Commenters wanted educational opportunities and special events and programming to continue if NPS designation occurred. These special events include First Fridays, Bloodies and Biscuits during Mule Day, the Dark Horse Dinner, the Polk Memorial Ball, the Polk Luncheon, Spring Luncheon, Farm to Table Dinners, and garden parties. These special events were described as local traditions, and commenters hoped that these would remain and continue to be a source of funding. Local horticultural and social groups also want to continue using the gardens for social gatherings in support of the Polk Home.

Commenters also mentioned continuing children’s programming, summer camps, the Polk Academy, field trips, and school programs. Tours of the home and revolving exhibits at the Polk Presidential Hall were also highlighted as activities that commenters would like to see continue. Activities such as demonstrations of 1800s cooking, gardening, entertainment, daily life activities, lectures, and podcasts such as Polk’s America were highlighted as important. The newly installed kitchen garden was mentioned as popular among visitors. Commenters suggested that representations of Mexican-American War soldiers were needed.

The following question was posed in the newsletter and on the project website:

1. What objects, buildings, remaining features, values, and stories do you believe are most important at this site and why?

Commenters noted that the Polk home, the kitchen, and the Sisters’ House were all important, with the homes being rare examples of Federal-style architecture. All of the properties, though less often the garden cottage, were noted as contributing to the educational experience at the site.

The gardens were included in some comments for its educational importance, and in others, the beauty of the gardens was mentioned. Commenters expressed the desire that the property be kept whole. Polk Presidential Hall was included in some comments for its exhibit space and its enhancement of the educational experience. Polk Presidential Hall was identified in one comment as a space where the association could continue to operate if a cooperative management decision with the National Park Service was made. The gift shop and bookstore were also highlighted as an important feature.

The museum collection regularly appeared as important in comments. The museum collection includes artifacts and papers that belonged to James K. and Sarah Polk, especially during their time in the White House; artifacts owned by the association; and artifacts on loan from other museums and organizations. The collection and the display of the museum collection enhanced visitors' experience at the Polk Home. Commenters expressed their desire that the collections, from a variety of time periods associated with the Polk's and their lives in the Columbia community, continue to be interpreted rather than just the period between 1818–1824, when James K. Polk lived at the home. Within the larger community, commenters noted how the home was connected to the Civil War Trails, the Rattle and Snap Plantation, and St. John's Church, and other commenters noted that Sarah Polk made significant contributions to American culture that should also be interpreted at the site.

Some commenters noted that the educational experiences at the Polk Home provided important opportunities to reflect on history, the way of life, and how much has changed since James K. Polk was alive. Commenters noted that the history presented at the Polk Home was inspiring, considering what President Polk was able to accomplish in one term as president. Commenters noted that the educational experiences also provided an

opportunity to consider what was done wrong to ensure that those mistakes are not repeated. Some important themes and stories that were mentioned included the debate around slavery; tariffs; national debt; banking reform; Manifest Destiny; westward expansion; the Mexican-American War; immigration; influential women; family; Polk's Scotch-Irish and Presbyterian heritage and democratic ideals; Polk's relationship with North Carolina, Texas, and Oregon; Polk's role in establishing the Smithsonian Institution, the Washington Monument, the US Naval Academy in Annapolis, and an independent US Treasury; Polk's health issues; and Polk's brief post-presidency. Also mentioned in the public comments was the interest in how different segments of society were impacted by the practices, thoughts, and actions during the time in which the Polk's lived.

A few commenters noted that the Polk Home and Polk's story was as important as President Andrew Jackson, though President Jackson tends to overshadow Polk in recognition of state history. Commenters stated that the general public has nowhere else to go to learn about President Polk.

The following question was posed in the newsletter and on the project website:

1. Do you have any other ideas, comments, or concerns you would like to share with us, including your level of support for a potential NPS designation?

Additional comments received included general comments regarding the relocation of the tomb and considerations around the period of interpretation.

Some commenters mentioned the Polk tomb in Nashville and plans to relocate the tomb to Columbia. Four commenters were in support of moving the tomb to Columbia, and four were not.



Miscellaneous concerns about NPS designation included increasing parking at the site to accommodate increased visitation. Other needs at the site included updating the restrooms, using the kitchen for educational purposes, and implementing a site plan developed by landscape architect, Ben Page. Two commenters expressed interest in the site being further developed as a presidential library, possibly in Polk Presidential Hall.

One commenter expressed a desire to see archeological excavations at the Polk Home and more information on the enslaved individuals who were at the Polk Home, including genealogical research. Commenters also noted that original historic buildings, fabrics, and objects were of primary importance, and the arrangement of the Polk Home was not period appropriate. These commenters questioned if the National Park Service would rearrange the site to its original form and noted that they did not support an empty house concept for the museum collection and Polk Home.

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# APPENDIX A: LEGISLATION FOR THE PRESIDENT JAMES K. POLK HOME SPECIAL RESOURCE STUDY PUBLIC LAW (PL 116-9)

PUBLIC LAW 116-9—MAR. 12, 2019

133 STAT. 719

## TITLE II—NATIONAL PARKS

### Subtitle A—Special Resource Studies

#### SEC. 2001. SPECIAL RESOURCE STUDY OF JAMES K. POLK PRESIDENTIAL HOME.

(a) DEFINITION OF STUDY AREA.—In this section, the term “study area” means the President James K. Polk Home in Columbia, Tennessee, and adjacent property.

(b) SPECIAL RESOURCE STUDY.—

(1) STUDY.—The Secretary shall conduct a special resource study of the study area.

(2) CONTENTS.—In conducting the study under paragraph (1), the Secretary shall—

(A) evaluate the national significance of the study area;

(B) determine the suitability and feasibility of designating the study area as a unit of the National Park System;

(C) consider other alternatives for preservation, protection, and interpretation of the study area by the Federal Government, State or local government entities, or private and nonprofit organizations;

(D) consult with interested Federal agencies, State or local governmental entities, private and nonprofit organizations, or any other interested individuals; and

(E) identify cost estimates for any Federal acquisition, development, interpretation, operation, and maintenance associated with the alternatives.

(3) APPLICABLE LAW.—The study required under paragraph (1) shall be conducted in accordance with section 100507 of title 54, United States Code.

(4) REPORT.—Not later than 3 years after the date on which funds are first made available for the study under paragraph (1), the Secretary shall submit to the Committee on Energy and Natural Resources of the Senate and the Committee on Natural Resources of the House of Representatives a report that describes—

(A) the results of the study; and

(B) any conclusions and recommendations of the Secretary.

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## APPENDIX B: NPS MANAGEMENT POLICIES CRITERIA FOR INCLUSION

### 1.3 CRITERIA FOR INCLUSION

Congress declared in the National Park System General Authorities Act of 1970 that areas comprising the national park system are cumulative expressions of a single national heritage. Potential additions to the national park system should therefore contribute in their own special way to a system that fully represents the broad spectrum of natural and cultural resources that characterize our nation. The National Park Service is responsible for conducting professional studies of potential additions to the national park system when specifically authorized by an act of Congress, and for making recommendations to the Secretary of the Interior, the President, and Congress. Several laws outline criteria for units of the national park system and for additions to the National Wild and Scenic Rivers System and the National Trails System.

To receive a favorable recommendation from the Service, a proposed addition to the national park system must

(1) possess nationally significant natural or cultural resources, (2) be a suitable addition to the system, (3) be a feasible addition to the system, and (4) require direct NPS management instead of protection by other public agencies or the private sector. These criteria are designed to ensure that the national park system includes only the most outstanding examples of the nation's natural and cultural resources. These criteria also recognize that there are other management alternatives for preserving the nation's outstanding resources.

### 1.3.1 NATIONAL SIGNIFICANCE

NPS professionals, in consultation with subject-matter experts, scholars, and scientists, will determine whether a resource is nationally significant. An area will be considered nationally significant if it meets all of the following criteria:

- It is an outstanding example of a particular type of resource.
- It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage.
- It offers superlative opportunities for public enjoyment or for scientific study.
- It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.

National significance for cultural resources will be evaluated by applying the National Historic Landmarks criteria contained in 36 CFR Part 65 (*Code of Federal Regulations*).

### 1.3.2 SUITABILITY

An area is considered suitable for addition to the national park system if it represents a natural or cultural resource type that is not already adequately represented in the national park system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector.

Adequacy of representation is determined on a case-by-case basis by comparing the potential addition to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. The comparative analysis also addresses rarity of the resources, interpretive and educational potential, and similar resources already protected in the national park system or in other public or private ownership. The comparison results in a determination of whether the proposed new area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas.

### 1.3.3 FEASIBILITY

To be feasible as a new unit of the national park system, an area must be 1) of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries), and (2) capable of efficient administration by the Service at a reasonable cost.

In evaluating feasibility, the Service considers a variety of factors for a study area, such as the following:

- size
- boundary configurations
- current and potential uses of the study area and surrounding lands
- landownership patterns
- public enjoyment potential
- costs associated with acquisition, development, restoration, and operation
- access
- current and potential threats to the resources
- existing degradation of resources
- staffing requirements
- local planning and zoning
- the level of local and general public support (including landowners)
- the economic/socioeconomic impacts of designation as a unit of the national park system

The feasibility evaluation also considers the ability of the National Park Service to undertake new management responsibilities in light of current and projected availability of funding and personnel.

An overall evaluation of feasibility will be made after taking into account all of the above factors. However, evaluations may sometimes identify concerns or conditions, rather than simply reach a yes or no conclusion. For example, some new areas may be feasible additions to the national park system only if landowners are willing to sell, or the boundary encompasses specific areas necessary for visitor access, or state or local governments will provide appropriate assurances that adjacent land uses will remain compatible with the study area's resources and values.

### 1.3.4 DIRECT NPS MANAGEMENT

There are many excellent examples of the successful management of important natural and cultural resources by other public agencies, private conservation organizations, and individuals. The National Park Service applauds these accomplishments and actively encourages the expansion of conservation activities by state, local, and private entities and by other federal agencies. Unless direct NPS management of a studied area is identified as the clearly superior alternative, the Service will recommend that one or more of these other entities assume a lead management role, and that the area not receive national park system status.

Studies will evaluate an appropriate range of management alternatives and will identify which alternative or combination of alternatives would, in the professional judgment of the Director, be most effective and efficient in protecting significant resources and providing opportunities for appropriate public enjoyment. Alternatives for NPS management will not be developed for study areas that fail to meet any one of the four criteria for inclusion listed in section 1.3.

In cases where a study area's resources meet criteria for national significance but do not meet other criteria for inclusion in the national park system, the Service may instead recommend an alternative status, such as "affiliated area." To be eligible for affiliated area status, the area's resources must (1) meet the same standards for significance and suitability that apply to units of the national park system; (2) require some special recognition or technical assistance beyond what is available through existing NPS programs; (3) be managed in accordance with the policies and standards that apply to units of the national park system; and (4) be assured of sustained resource protection, as documented in a formal agreement between the Service and the nonfederal management entity. Designation as a "heritage area" is another option that may be recommended. Heritage areas have a nationally important, distinctive assemblage of resources that is best managed for conservation, recreation, education, and continued use through partnerships among public and private entities at the local or regional level. Either of these two alternatives (and others as well) would recognize an area's importance to the nation without requiring or implying management by the National Park Service.

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## **APPENDIX C: COMPILATION OF PUBLIC COMMENTS**

The following is a summary of comments received during the virtual public informational meeting and from the project (PEPC) website.

# **JAMES K. POLK HOME SPECIAL RESOURCE STUDY DRAFT CIVIC ENGAGEMENT SUMMARY**

**MAY 2021**

The National Park Service (NPS) initiated the special resource study (SRS) of the James K. Polk Home and adjacent property in Columbia, Tennessee, in 2019. In the initial steps of the process, the study team gathered information regarding the site and met with key stakeholders. In January 2021, the study team initiated a civic engagement process to inform the special resource study.

## **SUMMARY OF PUBLIC OUTREACH**

During the civic engagement process, the National Park Service solicited feedback from the public through a newsletter, the project website, and a virtual public meeting, which was advertised through a press release in local and regional media. The study team emailed notifications regarding the virtual public meeting and public comment period to the Tennessee Historical Society, Tennessee State Museum, State Historic Preservation Officer, Tennessee Historical Commission, and the President James K. Polk State Historic Site in North Carolina.

The James K. Polk Memorial Association (Association) posted announcements on Facebook and Instagram and sent email notifications to their members, local government, museum stakeholders, and Polk's America Lecture and Podcast Series distribution list. They also mailed approximately 600 hard copies of the newsletter in early March 2021 to members of the Association. The newsletter included an overview of the site, a description of the study, the criteria used in special resource studies, and an invitation to submit comments via the project website or mailed correspondence.

The official public comment period opened on Tuesday, January 19, 2021, and closed on Saturday, March 20, 2021. The study team hosted one virtual public meeting on January 28, 2021, via the Microsoft Teams Live platform. The meeting was held from 7:00 p.m. to 8:30 p.m. (ET). The goals of the meeting were to share information regarding the purpose and process for special resource studies, provide an overview of the criteria the National Park Service applies when conducting special resource studies, provide an overview of the site and current management, and seek feedback from the public.

A project website was created on the Planning, Environment, and Public Comment (PEPC) site (<http://parkplanning.nps.gov/polksrs>) to share project updates, share information regarding the virtual public meeting, and collect public comments.

## **PUBLIC INTEREST**

Approximately 23 people attended the virtual public meeting where members of the public were invited to submit comments to the PEPC website. During the public comment period, there were 56 comments submitted to the study team. Of these, 51 were submitted through PEPC, 4 were submitted during the virtual public meeting, and 1 was emailed to the study team. The correspondences submitted during the virtual public meeting and the emailed correspondence were entered into the PEPC website by NPS staff. Public comments were submitted from individuals in six

states and four unknown locations. The following table provides the distribution of public comments that were submitted directly to the PEPC website (table 1).

**Table 1. Geographic Distribution of Correspondences**

| State  | Percentage     | Number of Correspondences |
|--|----------------|---------------------------|
| Tennessee  | 83.9%          | 47                        |
| Unknown ( <i>captured during virtual meeting</i> ) | 7.1%           | 4                         |
| Florida  | 1.8%           | 1                         |
| Illinois   | 1.8%           | 1                         |
| Maryland   | 1.8%           | 1                         |
| North Carolina                                     | 1.8%           | 1                         |
| Pennsylvania                                       | 1.8%           | 1                         |
| <b>Total</b>                                       | <b>100.00%</b> | <b>56</b>                 |

In addition to general public comments, the National Park Service received comments from two great, great, great nephews of James K Polk, as well as the following organizations:

- James K. Polk Memorial Association
- Heritage Bank & Trust
- Maury Regional Medical Center
- Workpress Collectives

The National Park Service received one letter from an official representative of

- Maury County Government

## **PUBLIC OPINIONS, PERCEPTIONS, AND VALUES**

The National Park Service sought feedback on the special resource study by asking the public to answer three questions. The questions were listed in the newsletter and during the virtual public meeting. The questions were:

1. What is your vision for preserving the James K. Polk Home, and how would you like to see the site managed? What types of activities and experiences do you want to see as part of the Polk Home's future?
2. What objects, buildings, remaining features, values, and stories do you believe are most important at this site and why?
3. Do you have any other ideas, comments, or concerns you would like to share with us, including your level of support for a potential NPS designation?

The following is a brief overview of the comments made by respondents, broken down by the four main topics in the scoping questions above.

## **Vision for Preserving the James K. Polk Home and Site Management**

General comments for preserving the site included support of similar management as to what is currently being done and maintaining the site for future generations to enjoy. Comments showed support for preserving the site and displayed great pride in sharing the home and resources with the local community and tourists.

The public comments demonstrated both support and opposition for a national park designation and also suggested a joint management option for preserving the site into the future.

## **Support for NPS Designation**

Approximately two-thirds of comments received were in support of NPS designation. The public cited great importance of the presidential site, and that it should be preserved and protected for the enjoyment of the public and future generations under NPS management. Supporters thought there would be additional stability to manage the site into perpetuity and noted that it is becoming increasingly difficult to secure adequate funding through grants and fundraising. Others noted that an NPS designation would bring credibility and visibility for the home as a historic site.

A few comments received mentioned that NPS designation could make the site more high profile and bring in additional tourism to the area. One comment noted that an NPS designation would play a big role in marketing the local community nationally while providing additional opportunities for federal employment.

Commenters who were supportive of NPS designation stated that without NPS management, the site would be lost or destroyed. Commenters noted the challenges in securing funding for operations, preservation, and programming, recruiting volunteers to keep the Association running, and a loss of support from the State of Tennessee to support the site. A stagnation of visitation and admissions were noted, and it was hoped by some commenters that being included as a unit in the national park system would increase the site's relevance.

Some commenters mentioned the National Park Service's experience and professionalism in managing other sites, developing educational programming, and finding traveling exhibits as a benefit to the Polk site in addition to the National Park Service being a secure funding source. Commenters wrote that park designation would bring visibility and credibility to the historically important site. Finally, many commenters who were in support of NPS designation and management frequently identified themselves as current or former Association board members.

Other commenters tentatively supported NPS designation and inclusion because of their understanding of Polk's national significance as well as the Association's financial constraints, but they would prefer that the Association continue managing the property. One commenter suggested a two- to three-year phased transition to achieve public and private support.

## **Opposition for NPS Designation**

Approximately one-third of comments received regarding designation were opposed to direct NPS management of the site. The public thought the site should be managed locally in Columbia within Maury County by the Association. Those opposed commented that the site is currently being managed effectively, with concerns of the site moving from local to national management.

The public expressed concerns regarding current special events and fundraising as being important aspects of the local community. Comments included hesitation that the federal government would change the site, taking away from the local feeling. Commenters stated that the members of the Association and volunteers were coming up with new ideas for interpretation and activities, and local fundraising was sufficient to protect the site and maintain programming. Commenters also felt that the site was uniquely personal and local (i.e., the site is operated by members of the community for the community). Many commenters in opposition to NPS designation mentioned the site does not need another level of bureaucracy, federal red tape, nor did these commenters trust the federal government.

One commenter noted that the site was not truly James K. Polk's home but the home of his father. Others, in their opposition, pointed to examples such as the Gordon House along the Natchez Trace Parkway, which shows deterioration, and the backlog of deferred maintenance within the National Park Service. There were also concerns expressed that the current Polk Home employees would lose their jobs if an NPS designation were made. Changes or limitations to operating hours, programming, educational focus, tours, and special events without local input were also causes of concern. State ownership of the site was suggested if the Association could no longer continue to preserve and operate the site.

A few commenters who were not supportive of the nomination stated that previous federal government shutdowns have hurt other NPS sites, and future radical shifts in NPS priorities and policy, as has been seen in the last few years, would hurt the Polk Home. Additional commenters were concerned about the personal politics of NPS employees impacting operations, interpretation at the site wandering into "*revisionism and political/cultural posturing*," the demonization of Polk along with other prominent past presidents, and the site becoming a target for "*radical revisionist insurrectionists*." An example of this last concern was Charles Pinckney National Historic Site. The commenter was also concerned about security at the Polk Home if it received NPS designation.

## **Affiliated Area**

About twenty comments mentioned a partnership approach between the local community and the National Park Service for long-term management. The comments identified a vision of a collaborative agreement with the National Park Service where management and operations of the site would remain the responsibility of the Association. As an affiliated area, comments received indicated it was important for the local community to retain control with financial and technical support from the National Park Service. Some comments suggested that if the designation occurred, a phased transition to the National Park Service would be ideal.

Suggestions for cooperative management between the National Park Service and the Association included retaining local control and programming with financial and technical assistance from the National Park Service, the Park Service supplying an advisor or member to the Association board, the properties being owned and operated by National Park Service but educational programming and volunteers being provided by the Association, and establishing a friends group relationship with the Association.

## **ACTIVITIES AND EXPERIENCES AT THE POLK HOME**

Educational opportunities and special events and programming were desired to continue if NPS designation occurred. These special events include: First Fridays, Bloodies and Biscuits during Mule Day, the Dark Horse Dinner, the Polk Memorial Ball, the Polk Luncheon, Spring Luncheon, Farm to Table Dinners, and garden parties. These special events were described as local traditions, and commenters hoped that these would remain and continue to be a source of funding. Local horticultural and social groups also want to continue using the gardens for social gatherings in support of the Polk Home.

Children's programming, summer camps, the Polk Academy, field trips, and school programs were also mentioned as desired to continue. Tours of the home and revolving exhibits at the Polk Presidential Hall were also highlighted as activities that commenters would like to see continue. Activities such as demonstrations of 1800s cooking, gardening, entertainment, daily life activities, lectures, and podcasts such as Polk's America were highlighted as important. The newly installed kitchen garden was mentioned as popular among visitors. Commenters suggested that representations of Mexican War soldiers were needed.

## **OBJECTS, BUILDINGS, FEATURES, VALUES AND STORIES MOST IMPORTANT AT THE SITE**

Commenters noted that the Polk home, the kitchen, and the Sisters' House were all important, with the homes being rare examples of Federal-style architecture. All of the properties, though less often the garden cottage, were noted as contributing to the educational experience at the site. The gardens were included in some comments for its educational importance, and in others, the beauty of the gardens was mentioned. Commenters expressed the desire that the property be kept whole. Polk Presidential Hall was included in some comments for its exhibit space and its enhancement of the educational experience. Polk Presidential Hall was identified in one comment as a space where the Association could continue to operate if a cooperative management decision with the National Park Service was made. The gift shop and bookstore were also highlighted as an important feature.

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included the debate around slavery; tariffs; national debt; banking reform; Manifest Destiny; westward expansion; the Mexican-American War; immigration; influential women; family; Polk's Scotch-Irish and Presbyterian heritage and democratic ideals; Polk's relationship with North Carolina, Texas, and Oregon; Polk's role in establishing the Smithsonian Institution, the Washington Monument, the United States (US) Naval Academy in Annapolis, and an independent US Treasury; Polk's health issues; and Polk's brief post-presidency. Also mentioned in the public comments was the interest in how different segments of society were impacted by the practices, thoughts, and actions during the time in which the Polk's lived.

A few commenters noted that the Polk Home and Polk's story was as important as President Andrew Jackson, though President Jackson tends to overshadow Polk in recognition of state history. Commenters stated that the general public has nowhere else to go to learn about President Polk.

## **CONCERNS OR OBSERVATIONS**

Additional comments received included general comments regarding the relocation of the tomb and considerations around the period of interpretation.

Some commenters mentioned the Polks' tomb in Nashville and plans to relocate the tomb to Columbia. Four commenters were in support of moving the tomb to Columbia, and four were not.

Miscellaneous concerns about NPS designation included increasing parking at the site to accommodate increased visitation. Other needs at the site included updating the restrooms, using the kitchen for educational purposes, and implementing a site plan developed by landscape architect, Ben Page. Two commenters expressed interest in the site being further developed as a presidential library, possibly in Polk Presidential Hall.

One commenter expressed a desire to see archeological excavations at the Polk Home and more information on the enslaved individuals who were at the Polk Home, including genealogical research. Commenters also noted that original historic buildings, fabrics, and objects were of primary importance, and the arrangement of the Polk Home was not period appropriate. These commenters questioned if the National Park Service would rearrange the site to its original form and noted that they did not support an empty house concept for the museum collection and Polk Home.

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## APPENDIX D: STUDY TEAM

### **NATIONAL PARK SERVICE, DENVER SERVICE CENTER**

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Julie Bell, Project Manager

Henrietta Degroot, Project Manager

Cynthia Nelson, Branch Manager

Chris Osgood, Quality Assurance  
Specialist, DSC

Suzanne Digre, Editor

Lisa Merkhofer, GIS Specialist

Zak Wood, GIS Specialist

John Paul Jones, Visual Information Specialist

Emily Tristant, Outdoor Recreation Planner

Monica Vigil, Outdoor Recreation  
Planner, Economist

Hillary Conley, Cultural Resource Specialist

### **NATIONAL PARK SERVICE, INTERIOR REGION 2**

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Ben West, Program Manager, Planning and  
Compliance Division

Kevin Crisler, Supervisory Project Manager,  
Facility Support Division

Treff Alexander, Project Manager, Facility  
Support Division

### **NATIONAL PARK SERVICE, PARK PLANNING AND SPECIAL STUDIES DIVISION, WASHINGTON OFFICE**

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Cherri Espersen, Program Analyst

Erika Wudtke, Program Analyst

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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 historic 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.

SERO 910/187393

January 2023

