



First Ladies National Historic Site

Final General Management Plan / Environmental Impact Statement



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Canton, Ohio

First Ladies National Historic Site was established in 2000 to “to preserve and interpret the role and history of First Ladies for the benefit, inspiration, and education of the people of the United States.” The site has no approved long-term management plan. This plan, which provides broad direction for the future of the site, is needed to determine how best to manage the site’s resources, and help managers make decisions based on a deliberate vision.

This document examines four alternatives for managing First Ladies National Historic Site for the next 15-20 years. It also analyzes the impacts of implementing each of the alternatives. The “no-action” alternative describes the existing conditions and trends at the site and assumes that these conditions would remain unchanged. It also serves as a basis of comparison for evaluating the other alternatives.

Alternative A would provide interpretation of the roles and significance of First Ladies through partnerships with women’s history sites, the White House, historical societies, First Ladies organizations, and other interested organizations for such resources as e-bibliographies, museum collections, exhibits, interpretive programs, curriculum-based education programs, and research. Local businesses would provide services such as parking, transportation, promotional materials, and grounds maintenance. The Saxton-McKinley House (House) and the Educational Resource Center (ERC) would be available for use by the National First Ladies Library (NFLL), National Park Service, and future partners.

Alternative B (preferred alternative) would provide a wide variety of methods to interpret the significance of First Ladies and their public roles and private lives. Emphasis would be placed on encouraging self-discovery and self-directed learning through experiential activities while on site. There would be a robust outreach program aimed at a broad range of potential visitors, from the unscheduled casual visitor to a vocational historians, museum curators, historic preservationists, and school groups. Alternative B is also the environmentally preferred alternative.

Alternative C would combine elements of traditional on-site visitation with an emphasis on scholarly research on the roles and impacts of the First Ladies and associated events. To achieve this concept, the NFLL would actively seek accreditation for the ERC as a research facility and also would seek museum accreditation for the House. The library collection would be an internationally known, comprehensive annotated electronic bibliographic library augmented by a collection containing printed material and small personal artifacts associated with each of the First Ladies. The target audience in this alternative is researchers.

The *Draft Environmental Impact Statement* was available for public review from mid-September 2005 to mid-November 2005; responses to comments are presented in the “Consultation and Coordination” chapter of this *Final Environmental Impact Statement*. No substantive comments were received on the draft document; consequently, no changes were made to the alternatives or the analysis of environmental consequences. The final document will be on review for 30 days. If no major comments are received during this period, a Record of Decision, indicating which alternative has been selected as the approved plan, will be signed. Comments should be addressed to Carol J. Spears, First Ladies National Historic Site GMP, 8095 Mentor Avenue, Mentor, OH 44060 or by email to carol_j_spears@nps.gov.

A Guide to this Document

This *Final General Management Plan/Environmental Impact Statement* is organized in accordance with the Council on Environmental Quality's implementing regulations for the National Environmental Policy Act and the National Park Service Director's Orders on Park Planning (DO-2) and Environmental Analysis (DO-12).

Chapter 1: Purpose of and Need for the Plan sets the framework for the entire document. It describes why the general management plan is being prepared and what needs it must address. It provides guidance for the alternatives that are being considered, and discusses the laws, special mandates, and NPS management policies upon which the alternatives are based.

The chapter also provides background for the plan, and details the issues and concerns raised during public scoping. Chapter 1 concludes with a statement of the scope of the environmental impact analysis, that is, which impact topics were or were not analyzed in detail.

Chapter 2: The Alternatives describes the no-action alternative (what the situation would be if the National Park Service took no additional action). It then describes three action alternatives, including the agency's preferred alternative (Alternative B). The alternatives propose varying degrees of emphasis on visitor experience, interpretation, collections, and research, and differing methods of management. The chapter concludes with summary tables of the alternatives and the environmental consequences of implementing those alternative actions.

Chapter 3: Affected Environment describes the areas and resources that would be affected by implementing the various alternatives. Those resources include cultural resources, visitor experiences, and park operations.

Chapter 4: Environmental Consequences analyzes the impacts of implementing the alternatives on the topics described in the "Affected Environment" chapter. Methods used for assessing the impacts in terms of the intensity, type, and duration of impacts are outlined at the beginning of the chapter.

Chapter 5: Consultation and Coordination describes the history of public and agency coordination, and lists agencies and organizations which will be receiving copies of this document.

The **Appendices** present supporting information for the document, along with selected references. The **Glossary** defines terms.

Summary

The purpose of this General Management Plan is to define a direction for the management of First Ladies National Historic Site for the next 15-20 years. The approved plan will provide a framework to guide park management decisions. The plan addresses NPS responsibilities at the site and provides guidance for preserving and protecting the site's resources.

Alternatives

To determine the desired conditions at the site, the planning team developed a “no-action” alternative (continuing present management) and three “action” alternatives for managing the resources and visitor uses of the site. Each action alternative assigns various areas of the site to different management zones. These zones identify ways that different areas could be managed to achieve a variety of resource conditions and visitor experiences. In each alternative, the five management zones — library zone, managed collection zone, historic zone, visitor zone, and administrative zone — would each specify a particular combination of resource, social, and management conditions.

The no-action alternative represents existing conditions at the site. Under this alternative, the site would continue to be managed as it has been in the past. This alternative is presented as a way of comparing current conditions to possible future conditions, as described in the other three alternatives. It provides a baseline for understanding why the NPS or the public may believe that certain future changes are necessary or advisable.

No new construction or major changes would take place under the no-action alternative, and the site's existing facilities would continue to be operated and maintained as they are currently.

Alternative A provides interpretation of the roles and significance of First Ladies through partnerships that share resources, collections, exhibits, and programs. The NFLL would provide docent training, supervise volunteers, and would be responsible for maintaining a docent/volunteer

program. The NFLL also would manage the House and ERC. The NPS would provide technical assistance, such as policy guidance, planning, cultural resources management, and service contracts. The primary audience in Alternative A is the general public.

Alternative A relies upon partnerships with others to offer a full range of resources to benefit the public. Partnerships would be sought with women's history sites, the White House, historical societies, First Ladies organizations, and other interested organizations for such resources as e-bibliographies, museum collections, exhibits, interpretive programs, curriculum-based education programs, and research. Local businesses would provide services such as parking, transportation, promotional materials, and grounds maintenance. The House and the ERC would be available for use by the NFLL, NPS, and future partners.

Alternative B (preferred alternative) would provide a wide variety of methods to interpret the significance of all First Ladies and their public and private lives by combining elements of traditional on-site visitation with an emphasis on scholarly research on the First Ladies and associated historical events. This concept would offer diverse experiences to a broad range of visitors, from the general public to educational groups and researchers. Emphasis would be placed on encouraging self-discovery and self-directed learning through experiential activities while on site.

The NFLL would have primary responsibility for administration and daily on-site operations. NPS would have limited responsibilities, which might include NPS participation in site orientation, interpretation, educational programming, and resource preservation activities. NPS may provide technical assistance, policy guidance, planning, staff and docent training, and volunteer development assistance. In this alternative, the NFLL would seek museum accreditation for the House.

Alternative B would develop a robust outreach program to provide relevant information about the

site to a broad range of potential visitors, from the unscheduled casual visitor to avocational historians, museum curators, historic preservationists, and school groups. The site would offer experiential activities on site and guided tours, as well as encourage self discovery and self-directed learning opportunities. The NPS and NFLL would acquire objects illustrating the public and private roles, and the social and political impacts, of the First Ladies for exhibits and interpretation. To the extent possible, the museum collection would be stored on site and exhibited and/or accessible to the visitors in public areas. There would be an on-site conservation laboratory.

The ERC would allow for greater use in educational programming based on current research, and would provide adequate space for the museum and library to ensure proper curation of the collections. The first floor and lower level of the building would accommodate visitor services and scheduled programming. Alternative B is also the environmentally preferred alternative.

Alternative C would combine elements of traditional on-site visitation with an emphasis on scholarly research on the roles and impacts of the First Ladies and associated events. To achieve this concept, the NFLL would actively seek accreditation for the ERC as a research facility and also would seek museum accreditation for the House. The target audience in this alternative is researchers.

The NPS and NFLL would share some aspects of site management under this alternative. The NFLL would coordinate programs, schedule tours, supervise docents and volunteers in both the House and the ERC, and would be responsible for their training and development. The NFLL also would manage the House museum. The NPS would provide technical assistance in such areas as policy guidance, planning, cultural resources management, and service contracting. Additionally, the NPS would provide an on-staff research professional. The NFLL and NPS collaboratively would plan and prepare exhibits and educational and interpretive programs offered at the House and ERC.

The library collection would be an internationally known, comprehensive annotated electronic bibliographic library augmented by a collection containing printed material and small personal artifacts associated with each of the First Ladies. As the collection expands, it is conceivable that the

collections would outgrow the existing storage space. In that case, additional museum-quality off-site storage would be sought. The bulk of the on-site collection, housed in the ERC, would be original or period objects, primary source material, authors' notes, research materials, and associated records.

Boundary Adjustment

The enabling legislation anticipates that the City National Bank Building, which houses the ERC, will be acquired by the NPS through donation from the NFLL. At the time of acquisition, the boundary will expand to include the City National Bank Building. This GMP has been written with the assumption that the transfer of ownership will occur during the time period that the GMP is in effect. This is true for any of the alternatives.

Under certain circumstances, the NPS may accept donations of property that was not included in the enabling legislation. Congressional legislation would not be required to accept donation of the Rotary Park and parking lot in order to include them within the boundary, because parcels of this size can be added to the site under the Land and Water Conservation Fund Act by publishing a notice in the *Federal Register* and notifying the appropriate Congressional delegation.

Environmental Consequences

The planning team evaluated the potential consequences that implementing each alternative would have on cultural resources, which includes historic structures and museum and library collections, and on visitor experience. The beneficial or adverse effects were categorized as either short term or long term, and their intensity was rated as negligible, minor, moderate, or major. The impacts of the various alternatives are compared in Table 3. Please see Chapter 4, Environmental Consequences, for a detailed analysis of the impacts of the management alternatives.

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Chapter 1: Purpose of and Need for the Plan

Introduction

This *Final General Management Plan and Environmental Impact Statement* presents four alternatives to guide future management and use of First Ladies National Historic Site (the site). Alternative B has been identified as the National Park Service's preferred future management direction. Potential consequences and environmental impacts of all alternatives are identified and assessed in this document.

Actions proposed in a general management plan (GMP) or in subsequent implementation plans are accomplished over time. Budget restrictions, requirements for additional data or legal compliance, and competing National Park Service (NPS) priorities can prevent immediate implementation of many actions. Complex or especially costly actions could be implemented ten or more years into the future.

A multi-disciplinary planning team prepared the GMP. The planning team is composed of the site manager, executive director of the National First Ladies Library (NFLL), members of the staff of Cuyahoga Valley National Park, and members of the NPS Midwest Regional Office in Omaha, Nebraska. The enabling legislation (2000) established the site and directed the NPS to prepare this plan in consultation with the NFLL and other appropriate agencies or organizations.

The team consulted with the partners mentioned above, the general public, and city, state, and federal agencies through official correspondence, meetings, newsletters, and personal contacts. The opinions and ideas of the partners and the public are incorporated into the draft management alternatives. The "Consultation and Coordination" chapter of this plan describes the public involvement process in greater detail.

Purpose of the Plan

The purpose of this action is to develop a GMP for the site, which became a unit of the National Park System on October 11, 2000, pursuant to the provisions of Public Law 106-291 (114 Stat. 950). (See Appendix A for the full text of the enabling legislation.)

The GMP provides a comprehensive management framework that will guide resource preservation, visitor use, and administration of the site for the next 15-20 years. This document will not propose specific actions or describe how particular programs or projects will be implemented or prioritized. Those decisions will be deferred to more detailed implementation planning, which will follow the broad, comprehensive guidance presented in this document.

Need for the Plan

This plan is needed because the First Ladies National Historic Site is a new unit in the National Park System and currently has no approved long-term management plan. This plan, which provides broad direction for the future of the site, is needed to help managers make purposeful decisions based on a deliberate vision.

The GMP represents a commitment by the NPS to the public on how the site will be used and managed. The plan is intended to:

- Confirm the mission, purpose, and significance of the site.
- Define the various roles to be taken by the NPS and the NFLL in their partnership at the site.
- Determine the best mix of resource protection and visitor experience beyond what is prescribed by law and policy. This mix is based on the mission, purpose, and significance statements for the site, the cultural and natural resources at the site, the impacts of the alterna-

tives on cultural and natural resources, socioeconomic conditions, impacts on visitor use and experience, and long-term economic considerations and costs.

- Define management prescriptions that implement the goals of the NPS and the public with regard to cultural and natural resource management and protection and visitor use and experience. Facilities that are appropriate within each management prescription also are identified.
- Determine the areas to which the management prescriptions should be applied to achieve the overall management goals of the site.
- Assist the site staff in determining whether proposed actions are consistent with the goals embodied in the approved GMP.
- Serve as the basis for more detailed future management documents, such as five-year strategic plans and implementation plans.

Establishment of the Site

First Ladies National Historic Site, the 380th unit admitted to the National Park System, is a concept as well as a place. It is a site that commemorates the First Ladies' contributions to American society, with the charge from Congress "...to preserve and interpret the role and history of First Ladies for the benefit, inspiration, and education of the people of the United States." The First Ladies National Historic Site Act of 2000 established the site to "provide...education and study into the impact of First Ladies on our history"

Brief Description of the Site

The First Ladies National Historic Site is located in downtown Canton, Ohio. (See map on p. 3) The historic site includes a 19th century structure known as the Ida Saxton McKinley House (House) at 331 Market Avenue South, and the City National Bank Building located at 205 Market Avenue South. Market Avenue is the city's primary north-south artery. The total amount of land within the authorized boundary is 0.33 acres, and contains the House. (See Site map on p. 3) The NPS owns the House, and is authorized by Congress to accept as a donation the City National Bank Building. The bank building currently is owned by the NFLL, and has been renovated to serve as the

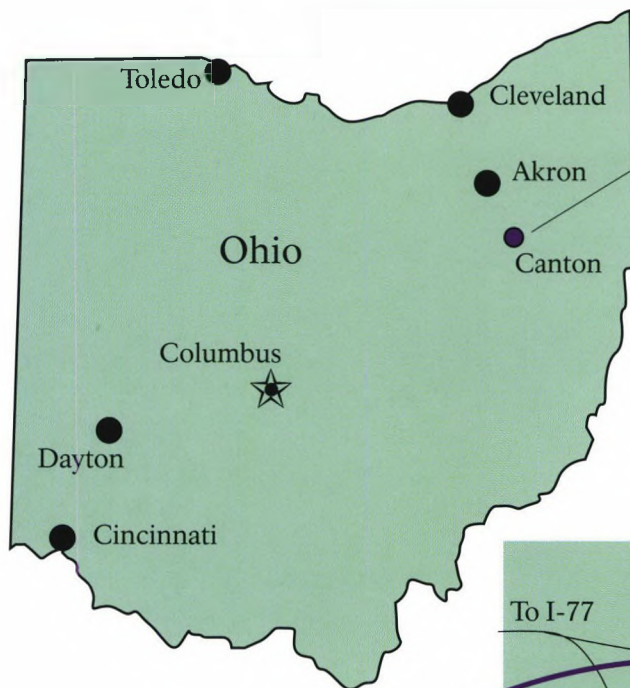
Education and Research Center (ERC). If such a donation were accepted, the boundary would be expanded to include it.

George Dewalt, Ida McKinley's maternal grandfather, built the initial structure at the intersection of Fourth Street and Market Avenue South in 1841. The earliest portion, a two-story gable-roofed building, is at the rear of the present structure. The Second Empire three-story section at the front of the house was added in the 1860s by Ida's father, James Saxton. The core of the house was substantially remodeled in 1865 and again in 1920. Today, the structure is a three-story brick Second Empire style house with a full-length wrap-around front porch, which reflects the prosperity of James Saxton, founder of the Stark County Bank.

The House is the only residence remaining in Canton that has direct historic association with President William McKinley. He and his wife, Ida, lived in the house while McKinley served in the United States Congress (1876 to 1890). McKinley was a popular military officer during the Civil War and a leading figure in local and state politics, serving as Stark County Prosecuting Attorney and Governor of Ohio before he became the 25th President of the United States (1897-1901). Because William McKinley served as a Congressman and Governor of Ohio, as well as President of the United States, the House has national, statewide, and local historical value. The House itself represents upper class 19th century lifestyles, along with possessing significant architectural merit, structural techniques, decorative details and craftsmanship. It was listed in the National Register of Historic Places on April 26, 1979.

The City National Bank Building, constructed in 1895, is a 25,000 square foot, six-story (with a lower level) commercial structure, in the Richardsonian Romanesque architectural style. It is constructed of masonry, with multiple cornices, scored friezes, triple ionic columnets, colonette and varied fenestration. The building stands on one of Canton's principal arteries just south of the Central Plaza. It is the only remaining example of 19th century Romanesque architecture in downtown Canton, and is the only bank building of its era still standing in Canton's 19-block commercial center.

Although the City National Bank Building is not currently within the park boundary, the NPS



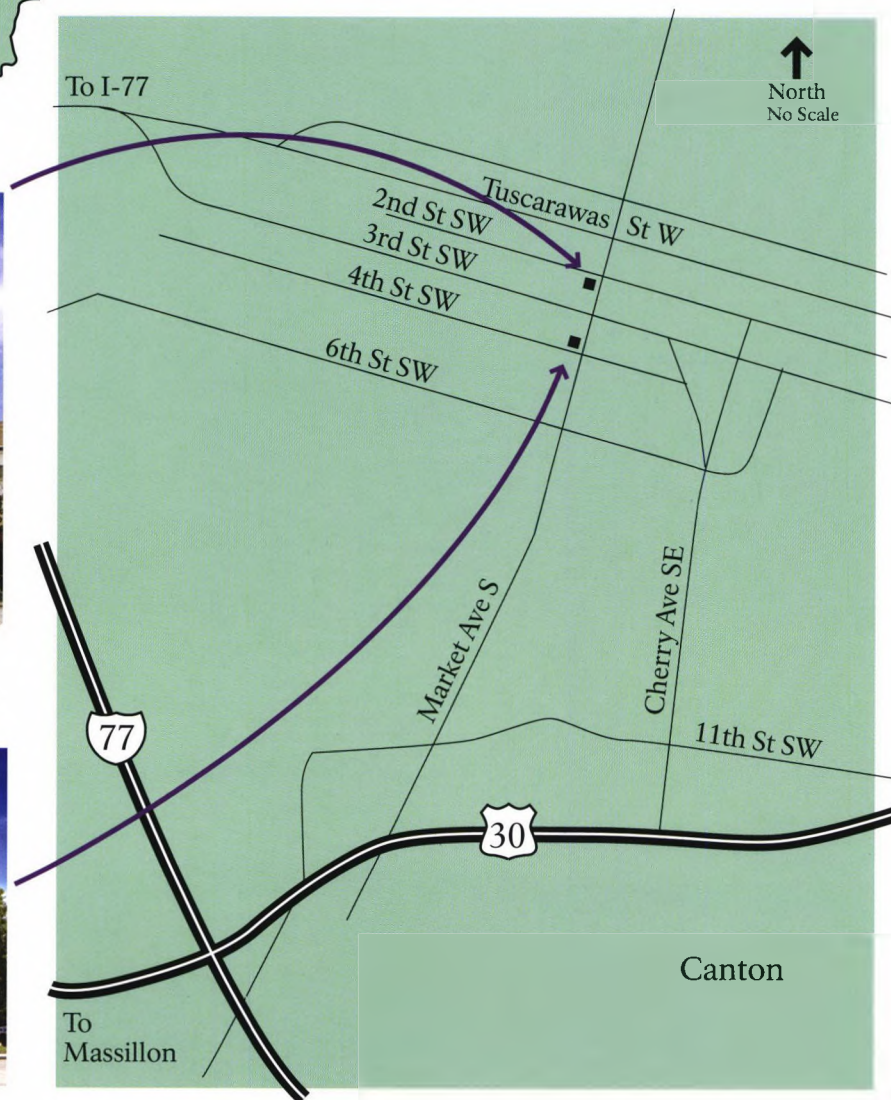
First Ladies
National Historic Site



Education and
Research Center



First Ladies National
Historic Site
(Saxton House)



First Ladies National Historic Site Location

National Park Service
U.S. Department of the Interior

expects to receive it, in accordance with a Cooperative Agreement between the NPS and NFLL and the park's enabling legislation (PL 106-291; see Appendix A).

Laws and Policies

As with all units of the National Park system, management of the First Ladies National Historic Site is guided by the 1916 act creating the National Park Service and other applicable laws and regulations, such as the National Historic Preservation Act and the National Environmental Policy Act, as well as NPS management policies. Many resource conditions and some aspects of visitor experience are prescribed by these laws and policies. Although full attainment of these conditions may be deferred because of funding or staffing limitations, the NPS will continue to strive to implement these laws and policies. The conditions prescribed by laws, regulations, and policies most pertinent to the planning and management of the site are summarized in this section.

Partnerships

NPS Mission Goal Category III of the NPS Strategic Plan calls for strengthening and preserving natural and cultural resources through partnership programs in historic preservation, conservation, and recreation. The NPS is in partnership with other federal agencies, states and territories, local governments, Indian tribes, private organizations, Friends Groups, academic institutions, and the general public to help ensure that natural and cultural resources are conserved and enjoyed by visitors. Current policy requires the following:

Law or Policy

NPS Management Policies 2001 (sec. 2.3.1.6, Public Involvement; sec. 2.3.1.9, Cooperative Planning)

Management Direction and Action

The NPS will work cooperatively with others to anticipate, avoid, and resolve potential conflicts, to protect site resources, and to address mutual interests in the quality of life for community residents. Regional cooperation will involve federal, state, and local agencies, neighboring landowners, and all other concerned parties.

The NPS will continue to establish and foster partnerships with public and private organizations to achieve the purposes and mission of the site. Partnerships will be sought for resource protection, research, education, and visitor enjoyment purposes.

The NPS will work closely with local, state, federal agencies, and partners whose programs affect, or are affected by, activities at the site.

Impairment

In addition to determining the environmental consequences of the alternatives, *Director's Order 55, Interpreting the NPS Organic Act*, fully incorporated within NPS Management Policies 2001, requires the analysis of potential effects to determine if actions would impair park resources. Under the Organic Act and the General Authorities Act, as amended, the NPS may not allow the impairment of park resources and values, except as authorized specifically by Congress. The NPS must always seek ways to avoid or minimize, to the greatest degree practicable, adverse impacts on park resources and values. However, these laws do give the NPS management the discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment to the affected resources and values (*Management Policies 2001*, section 1.4.3).

Law or Policy

1916 Organic Act, General Authorities Act, NPS Management Policies 2001

"The primary responsibility of the National Park Service...is to ensure that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for employment of them." Park resources and values are broadly considered to be the purpose for which the park was established.

Management Direction and Action

The proposed actions will not impair park resources and values. An analysis of the potential to impair, preserve, or restore park resources and values is contained in the "Environmental Consequences" chapter.

Cultural Resources

Current laws and policies require that the following conditions be achieved for historic properties (e.g., structures) at the site.

Law or Policy

National Historic Preservation Act; Executive Order 11593; Archeological and Historic Preservation Act; the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation; Programmatic Memorandum of Agreement among the NPS, the Advisory Council on Historic Preservation, and the National Council of State Historic Preservation Officers (1955); *NPS Management Policies 2001*.

Management Direction and Action

Historic properties are inventoried and their significance and integrity evaluated under National Register of Historic Places criteria.

The qualities that contribute to eligibility for listing of historic properties on the National Register are protected in accordance with the Secretary of the Interior's Standards unless it is determined through a formal process that disturbance or natural deterioration is unavoidable.

Museum Collections

Current laws and policies require that the following conditions be achieved at the site to protect and preserve site-specific cultural and natural history collections — museum objects, specimens, manuscripts, and archival collections.

Law or Policy

Antiquities Act of 1906 (16 U.S.C. 431-433); National Historic Preservation Act; Archeological and Historic Preservation Act; Archeological Resources Protection Act; DO#24: NPS Museum Collections Management; Departmental Manual: 411 DM, Managing Museum Property; the Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3001) NPS Records Management Guideline; National Archives and Records Administration Standards; NPS Cultural Resources Management Guideline.

Management Direction and Action

Museum collections composed of original objects, specimens, and archival and manuscript materials representing cultural and natural resources in the United States are preserved and interpreted for public benefit.

Ensure that access and use are consistent with the laws and NPS policies pertaining to the Freedom of Information Act disclosures, copyright, privacy, publicity, etc., and resource protection.

Visitor Experience

Current laws and policies require that the following conditions be achieved in national park system units such as this site.

Law or Policy

Visitor Safety: *NPS Management Policies 2001*.

Interpretation and education: NPS Organic Act; the site's enabling legislation; *NPS Management Policies 2001*.

Visitor Services: *NPS Management Policies 2001*; enabling legislation; NPS Organic Act; Title 36, Code of Federal Regulations.

Access: Americans with Disabilities Act; Rehabilitation Act; *NPS Management Policies 2001*, Architectural Barriers Act

Management Direction and Action

Visitor and employee safety and health are protected.

Visitors understand and appreciate site values and resources, and have the information necessary to adapt to site environments; visitors have opportunities to enjoy the site in ways that leave resources unimpaired for future generations.

Basic visitor needs are met in keeping with site purposes.

To the extent feasible, facilities, programs, and services are accessible to and usable by all people, including those with disabilities.

Boundary Adjustments

Current laws and policies require that the following conditions be achieved for boundary adjustments.

Law or Policy

NPS Management Policies 2001 (3.5). “As part of the planning process, the NPS will identify and evaluate boundary adjustments that may be necessary or desirable in order to carry out the purposes of the park unit.”

Management Direction and Action

The general management plan will assess whether a boundary adjustment is needed to protect significant resources and values or to enhance opportunities for public enjoyment related to park purposes.

Carrying Capacity

The National Park Service uses general management plans to set goals for desired resource conditions and visitor experiences in parks. Carrying capacity is a measure used by the NPS to ensure that visitors do not adversely impact the integrity of its resources, and that overcrowding does not diminish the quality of the visitor experience. This process is accomplished in accordance with the purpose of the park and park mission goals.

Establishing carrying capacity assists in managing visitor activities along with protecting natural and cultural resources in a way that is consistent with the park’s authorizing legislation. Carrying capacity figures are useful in helping managers determine the appropriate type of facilities and intensity of activities in specific areas (management zones) of the park. They also are useful in determining the number of people that can be accommodated throughout the site so that visitors can have a high-quality experience without damaging the resources.

The carrying capacity for the House and the ERC is determined in part by the occupancy limits of the buildings, visitor access to the resource, and potential adverse impacts on the cultural resource base. Because they have recently undergone full rehabilitation, both buildings are in good condition. During summer 2004, the Facility Condition Index (FCI) of the House was rated 0.033, which is equivalent to a rating of “good”. Because the ERC is not yet NPS property, there is no FCI rating for the ERC, but NPS facility managers assessed it as

“good” using a system comparable to the FCI. The three-story House has an occupancy limit of 155 people. Tour groups are limited to 15 participants. (Please see the Visitor Experience section in the “Affected Environment” chapter.) Even including the House staff, the maximum use of the building at any given time is well under the maximum capacity. There is more than adequate space to accommodate a moderate increase in visitation without adversely impacting the resources.

The ERC has an occupancy capacity of 242. This seven-story building has a theater on the lower level and three floors of research library. The primary use of the building is as a research facility. Other visitors to the ERC are brought into the orientation area in the auditorium, followed by a tour through the facility. Tours in the ERC can accommodate up to 25 people per tour group. The use of the building and the capacity of the building are such that the historic fabric of the building will not be adversely impacted at current or moderately increased visitation levels. If, at some point after the ERC is included within the boundary of the site, the need arises for additional space, the NPS will conduct an analysis to determine whether additional facilities are required, and the most efficient use of that space.

First Ladies National Historic Site collections, which consist of original objects (artifacts), period pieces, and many high-quality reproductions, are both material, in terms of exhibits and objects in museum storage, and ephemeral, as in the electronic bibliographic database. The park must strive to preserve and protect these resources to the extent possible, in balance with the park purpose and mission.

The collections will be managed as museum property. Thus, management is responsible for meeting specific standards for accountability, preservation, and protection. *Director’s Order #24: Managing Museum Collections* states the objectives (listed below) for attaining these standards, which are used to determine carrying capacity for access and use.

- Ensure that NPS managers and staff have information on the standards and actions for successfully and ethically complying with *NPS Management Policies* on museum collections.
- Provide a means of measuring and evaluating progress in preserving, protecting, documenting, accessing, and using museum collections.

Access to, and use of, museum collections is a prime component of effective museum management

At the Saxton House, stanchions serve as boundaries to visitor access in order to protect the rooms and artifacts. To insure a quality experience for visitors on the guided tours of the House, the carrying capacity is determined by the number of people who may comfortably fit into the doorways and hallways and still view the restored rooms and hear the interpreter. The optimum number will vary depending on a variety of factors, thus carrying capacity related to visitor experience is expressed as a range.

Indicators of exceeding carrying capacity include:

- Complaints by visitors of not being able to see into the rooms
- Complaints by visitors of not being able to hear the interpreters
- Crowding against the ropes in order to fit the entire group into an area

These indicators are obtained and measured through the on-site interpreters' observations and written or verbal complaints by the public to interpreters or other NFLL staff.

The maximum number for visitor use of the lower level of the House is 20. The carrying capacity range for number of visitors on tours of the Saxton House to insure quality experiences has been determined to be 10 – 15 per tour. Groups larger than 15 could be divided to experience other visitor uses, e.g., the lower level of the ERC for orientation and information, and a tour of the ERC. Thus, the maximum number for one group, spread among the three locations, would be 45.

Visitors will start their visit with a film or other presentation in the theater on the lower level of the ERC. To insure a quality experience, visitors need to be able to sit in the auditorium for the presentation. The maximum number of seats in the theater is 91. That number is the maximum number for carrying capacity on the guided tours.

To ensure quality experiences at the ERC, the maximum number of researchers and scholars is determined by the number of research carrels and tables/chairs available on the four visitor-accessed floors. As with the guided tours, the optimum

number will vary according to a number of factors. The carrying capacity will also fluctuate, depending on the circumstances.

Visitor use data have been recently compiled for the NFLL. None of the data indicate evidence of adverse impacts on resources resulting from visitor activities, nor was there an indication that visitor conflicts were occurring as a result of increasing visitor numbers and types of uses. Based on these results, it was determined that the site is currently operating at or below its carrying capacity. Visitation levels that are being considered under the alternatives analyzed in this document generally can be accommodated without adverse impacts to the resources.

First Ladies National Historic Site staff will monitor resource and visitor conditions over time. If trends are identified that signal changes from the desired resource and visitor experience conditions, detailed visitor management planning will be initiated.

Special Mandates and Administrative Commitments

The conditions prescribed by mandates outlined in the enabling legislation and existing agreements most pertinent to the planning and management of the site are summarized in this section.

Special Mandates

- The NPS is to form a “public-private” partnership with the NFLL to operate and maintain the site.
- The NPS may acquire the historic City National Bank building at 205 Market Avenue South, Canton, Ohio, through donation from the NFLL.

Administrative Commitments

The NPS may enter into a cooperative agreement with the NFLL to operate and maintain the site, as noted above. In addition, the NPS may enter into cooperative agreements with other public and private organizations to further the purposes of the legislation. The cooperative agreement with the NFLL states that the NPS may provide the NFLL technical assistance for the “preservation of historic structures of, the maintenance of the cultural

landscape of, and local preservation planning for, the historic site.” Recent study, however, indicates that no cultural landscape remains.

Under the current cooperative agreement between the NPS and the NFLL, the NPS agrees to provide a part-time NPS Site Manager, who will be the “daily liaison for the NPS to (the site).” The NPS agrees to provide technical support for research, training, and professional development in interpretation, education, collections management, electronic data management and communications, and historic preservation.

Under the agreement, the NPS may provide financial assistance for operation and maintenance of the site, subject to congressional appropriations. Fees may be charged for admission to the site, and may be retained by the NFLL to be used for operations. The NFLL may be authorized by the NPS to manage any property in the historic site, including the ability to lease to other public or private entities and retain the lease fees for site operations. Under the cooperative agreement, the NFLL agrees to provide for public access to the Saxton House and City National Bank Building “according to a schedule and conditions mutually agreeable between” the NPS and NFLL.

Mutual activities under the cooperative agreement include the preparation and approval of all brochures, promotional publications, media releases, planning of visitor services, and acceptance of donations in support of the site. The parties agree to be flexible, acknowledging that the terms of the agreement will evolve as the site evolves.

Planning Direction

Congress, through the enabling legislation, provides the rationale for establishing the site and provides general direction, as well as specific guidelines, for the future. In addition, planning guidance is given in a number of laws, policies, mandates, and guidelines that already exist. These sources provide the basis for preparing the general management plan.

The planning team began by reviewing and interpreting the intent of the legislation that established the park. With input from the public and planning partners, the team identified the purpose and significance of the site. The legislation, purpose and

significance, and interpretive themes provided the parameters for formulating the alternatives.

The following sections define these terms and present the statements developed specifically for the site.

Park purpose

The enabling legislation provides the fundamental criteria against which the appropriateness of actions proposed in the draft alternatives is tested. The following statements derive from the enabling legislation and reflect the team’s interpretation of the legislative mandate that established the site:

- Preserve and interpret the role and history of First Ladies, and the impact of First Ladies on the history of the United States, for the benefit, inspiration, and education of the American people
- Provide public access to information about the contributions of First Ladies through on-site facilities and an electronic library
- Preserve the historic Ida Saxton McKinley House in Canton, Ohio

Park significance

Significance statements define important attributes that reflect the site’s purpose and the reasons the site was established. Significance statements capture the essence of the site’s importance to the nation’s cultural and natural heritage. Understanding the significance of the site helps managers set protection priorities and determine how to enhance visitor experiences.

Based on the legislation, the team developed the following significance statements:

- First Ladies National Historic Site maintains the nation’s most comprehensive electronic bibliography about the First Ladies of the United States. The site is dedicated solely to preserving and interpreting the role and history, and impact of American First Ladies. The site provides the public, students, scholars, and international visitors a variety of opportunities to access the primary repository of information about the history and significant contributions of First Ladies.

- The House is the only remaining private residence associated with President and First Lady Ida Saxton McKinley. The House illustrates the public and private lives of this First Family and the role of the First Lady.

Interpretive Themes

Interpretation is an educational activity designed to provoke thought and curiosity, convey messages, encourage emotional connections, and help people enjoy, appreciate, and preserve park resources and values. Interpretive planning includes determining the key messages, stories, concepts, and experiences associated with a park site, and recommending the best ways to communicate those messages and stories and provide those experiences. Interpretive themes are those key messages, stories, and concepts that are important for visitors to understand. They provide the foundation for interpretive programs and media (although they need not include everything that is interpreted in the park). The following five interpretive themes were developed for the site:

1. First Ladies of the United States have played a major role in, and have had a major impact on, the political and social history of our country, and responded to their circumstances and world events.
2. The personal experiences of our country's First Ladies were the catalysts that shaped their contributions to our nation's history.
3. The evolution of the role of "First Lady" reflects the political and social evolution of our country.
4. The House illustrates the relationship between the public and private lives of First Families and the role of the First Lady.
5. First Ladies National Historic Site provides access to primary resources to provide a greater, first-hand understanding of the history and roles of America's First Ladies.

Decision Points

Laws and policies provide broad, general guidance on decisions faced by park managers, who often need to examine resource conditions and goals unique to that particular site. For example, how does the NPS preserve the Saxton House without interfering with the visitor experience? Decisions

such as this, with more than one possible answer, are based on the purpose, significance, and laws and policies mentioned previously. The tension created by these possible solutions forms the basis for the range of alternatives. Preservation of significant resources, public expectations and concerns, resource analysis, evaluation of the natural, cultural, and social impacts of alternative courses of action, and long-term costs are other considerations. The following management decision points provide the basis of this GMP.

Decision Point 1

How can we provide for a range of visitor experiences while preserving important park resources?

Decision Point 2

To what degree does the site enter into partnerships to provide resource preservation, visitor services, and interpretation and education opportunities to visitors and retain its unique identity?

Decision Point 3

What are the roles and responsibilities of the NPS and the NFLL in serving the public and preserving the park resources?

Planning Issues

Planning issues for the site create the basis of the impact topics that are analyzed in this document (see p. 13), and provide a framework to determine what successful results will be. The general management plan provides a strategy for addressing the following issues within the context of the draft alternatives.

Visitor Experience

The following information related to visitor use of the site has been provided by the staff of the NFLL, and applies to both the House and ERC:

The average visitor spends two hours at the site. Two percent of visitors use the site solely for research. The peak visitor use period is April through October. Historical tours of the House, which last approximately 1½ hours, are available Tuesday through Saturday year-round, and on Sundays during the summer. Tours are conducted by volunteer docents. Docent training sessions are scheduled regularly, and special sessions are held each time an exhibit changes. Because of space constraints, reservations are required for tour groups of ten or more, and recommended, but not

required, for all others. Groups of more than 20 people are split into two or three smaller groups. While one small group is touring the House, the other members of the group visit the first floor and lower level of the ERC.

The ERC library is open by appointment only. Currently, visitor contact areas are located on the lower level and first floor. There, visitors can view several exhibits and short documentaries. There is seating for 91 people, and restrooms are available. The ERC provides some scheduled programming and visitor access to library collections by appointment.

Education and Interpretation

Interpretive programs continue to be developed. Exhibits are changed regularly to follow a specific theme or to cover a particular First Lady or group of First Ladies. Some public education programming occurs on the first floor and lower level of the ERC.

Boundary Adjustment

Each GMP assesses the boundary of a park to ascertain the adequacy of the boundary to fulfill the mission of the park. The alternatives examine whether there is a need to adjust the boundary (*NPS Management Policies 2001*, Sec. 3.5). The enabling legislation for the First Ladies National Historic Site specified the boundary of the national historic site and identified the properties to be included within the boundary. (See Appendix A for the full text of the enabling legislation.) The legislation also authorized the NPS to acquire the City National Bank Building by donation from the NFLL. If this donation is accepted, the boundary will be expanded to include the City National Bank Building.

Because the enabling legislation provides that the City National Bank Building, which houses the ERC, may be acquired by the NPS through donation from the NFLL, it is not necessary to conduct an assessment of the feasibility of such an expansion of the boundary. The NPS anticipates, however, that the NFLL might, at some point, wish to donate the Rotary Park and parking lot to the NPS. In that event, a boundary adjustment would be made to include the Rotary Park and parking lot within the site. Congressional legislation would not be required to accept donations of those parcels.

NPS policy requires that potential additions to a park be considered during the general management planning process. This boundary assessment considers adjusting the park boundary to include these two properties. The criteria for determining whether a boundary adjustment is appropriate are identified in Section 3.5 of the *National Park Service Management Policies 2001*. Boundary adjustments may be recommended for one of the following reasons:

- To protect significant resources and values, or to enhance opportunities for public enjoyment related to park purposes;
- To address operational and management issues, such as the need for access or the need for boundaries to correspond to logical boundary delineations such as topographic or other natural features or roads; or
- To otherwise protect park resources that are critical to fulfilling park purposes.

All recommendations for boundary changes then must meet the following two criteria:

- The added lands will be feasible to administer, considering their size, configuration, ownership, hazardous substances, costs, the views of and impacts on local communities and surrounding jurisdictions, and other factors such as the presence of exotic species; and
- Other alternatives for management and resource protection are not adequate.

Current status

The Rotary Park and adjacent parking lot, located between the Saxton House and the ERC on South Market Street, are currently owned by the NFLL. The Rotary Park is surrounded on three sides by parking lots or city streets, and is adjacent to the House. It is available for picnicking and other uses. The 38-space parking lot currently provides bus and passenger vehicle parking for visitors to the site. It is adjacent to the Rotary Park and within a block of the ERC.

Operation and Management

A review of the criteria for boundary assessments finds that the Rotary Park and parking lot could be added to address operational and management issues, should the NFLL wish to have these parcels managed as a part of the national historic site. The Saxton House, Rotary Park, and parking lot together make up the 300 block of Market Avenue South. Adding the Rotary Park and parking lot to

the site would correspond to logical boundary delineations, and bring the entire block under the administration of the NPS, facilitating budget and long-term management, including upkeep and maintenance.

The Rotary Park and parking area provide individual visitors, school groups, and other tour groups with parking, a staging area, and a place to have lunch, which help the site offer a high-quality visitor experience. Adding these parcels to the boundary of the First Ladies National Historic Site would ensure the long-term availability of both parcels.

Feasibility

The parcels are small and easily accessible, and no hazardous substances are associated with them. These two parcels adjacent to the site are currently being used by visitors, and no change in their use would be anticipated in any of the alternatives. No fees have been charged for parking since the NFLL purchased the parking lot, so there would not be any economic impacts on the local community.

Costs

Including the Rotary Park and parking lot inside the NPS boundary would not add to the cost of the NPS operating budget, as the NPS currently reimburses the NFLL for these costs through a cooperative agreement (\$9,700/year based on FY2004). Cooperative agreements are typically renegotiated every five years (with yearly modifications of the amount of funds available for reimbursement). The current cooperative agreement between the NPS and the NFLL runs until the year 2007.

All these factors make it feasible for the NPS to administer these additional parcels.

Potential addition to the site

If the boundary were expanded to include the adjacent parking lot, there would be a negligible positive impact on visitor experience. The area would be within the visitor experience zone.

As well as being used as a picnic area, the Rotary Park could be incorporated into interpretive programs that focus on the exterior of the House. Any addition of interpretive programs would have a minor beneficial impact on visitor experience.

Although street traffic and parking of vehicles would be noticeable to visitors, the overall visitor experience would be enhanced by having the Rotary Park available for the above uses. The Rotary Park would be located within the visitor experience zone.

Museum and Library Collections

At present, the collections storage space meets minimum NPS requirements and standards for museum and library collection storage. Because the museum and library collections are expected to grow as the site becomes more widely known and research continues, dedicated space for curation will be needed to accommodate the new acquisitions. Appropriate facilities, such as those described in detail in Chapter 4, will be needed to meet the NPS museum guidelines requirements for collections. The NFLL currently has on staff an historian consultant whose duties include collections management.

Partnerships

In the site's enabling legislation, Congress envisioned a private-public partnership between the NPS and the NFLL. The NPS also works cooperatively with others to improve the condition of parks, to expand public service, and to integrate parks into sustainable ecological, cultural, and socioeconomic systems. Other organizations with which the NPS may develop agreements potentially play an important role in interpreting the site story and preserving resources.

Issues Beyond the Scope of this Plan

The public and the partners offered the planning team ideas about the future of the site during the scoping session and through correspondence. Some of these ideas will be used in implementation plans. Other suggestions are outside the purview of the GMP. The categories of comments are listed below.

Ideas that were implementation plan issues, rather than GMP issues:

- Marketing plan
- Interpretive plan
- Historic furnishings plan

Implementation plans identify actions needed to achieve the site's long-term goals, as laid out in the GMP. Limiting the development of implementa-

tion plans to no longer than five years allows managers to assess issues and take advantage of opportunities as they arise. A marketing plan, for example, would be drawn up and implemented only after the GMP is approved, and the final scope of the selected alternative is known.

Ideas that were not planning issues:

- Membership directory
- Coordinate memberships to presidential sites
- Phone numbers for cooperating sites
- Brochure dealing with other sites on a thematic basis
- Developing A/V materials for sale
- Networking with similar sites on GMP process
- Continue to raise awareness at presidential sites

These suggestions include activities, products, and services that would normally be addressed in annual work plans. Work plans are part of a park's annual goals, which tier off the long-term goals. These are detailed plans that show what work will be done, by whom, and how it will be accomplished. Some of the ideas suggested above would most likely be included in the work plans that underlie the implementation plans for marketing or interpretation.

Impact Topics

Laws, policies, and, sometimes, public input determine which impact topics need to be analyzed. Applicable topics can and do vary among the units administered by the NPS. For example, the NPS is required to avoid, to the extent possible, the adverse impacts associated with the destruction or modification of wetlands. At a site such as First Ladies National Historic Site, where there are no wetlands, the topic of impacts on wetlands can be dismissed. In this plan, specific impact topics were selected for analysis, while others were eliminated. Relevant impact topics were selected based on agency and public concerns, regulatory and planning requirements, and other known resource issues. Subsequent discussions of the environment that would be affected and the impacts related to each alternative action focus on these impact topics. The rationale for selecting these topics is found in the "Affected Environment" and "Environmental Consequences" chapters.

Impact Topics Selected for Further Analysis

The following impact topics were selected for further analysis: cultural resources, which includes

historic properties and museum and library collections, and visitor experience. All natural resource topics were eliminated from further evaluation. The reasons behind that decision are discussed in the section, "Impact Topics Eliminated from Further Evaluation."

Cultural Resources

Federal laws such as the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA) require that the effects of any federal undertaking on cultural resources be examined. Also *NPS Management Policies 2001*, *Cultural Resource Management Guideline* (Director's Order 28), and *NPS Museum Collections Management Guideline* (Director's Order 24) call for consideration of cultural resources in planning proposals. Consideration of effects on historic properties is required under the NHPA and is included in the "Servicewide Policies and Mandates" section. The alternatives proposed in this plan have the potential to affect the House, and the library and museum collections.

Visitor Experience

Providing for visitor enjoyment, understanding, and stewardship is one of the fundamental purposes of the NPS. Actions proposed in this management plan could affect patterns of visitor use and the type and quality of visitor experiences. Visitor access, orientation, and interpretation are specific elements of the visitor experience. Impacts in other topic areas could also directly affect visitor experience. Actions proposed in this plan would directly affect the visitor experience and number of visitors using the site.

Impact Topics Eliminated from Further Analysis

Environmental Justice

Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. The immediate vicinity of the site is a business district. The two-to-three lots in this urban setting that would be changed from commercial activities or vacant

property to a National Historic Site creates no health or environmental effects on minorities (including American Indian tribes) or low-income populations or communities as defined in the Environmental Protection Agency's *Environmental Justice Guidance* (1998). Accordingly, Environmental Justice has been dismissed as an impact topic in this document.

Cultural Landscape and Historic Streetscape

Through the years, the House and its adjacent features have undergone numerous alterations, to the point that all evidence of the site's cultural landscape and streetscape has been erased. In a field evaluation of the site, an NPS Cultural Landscape Inventory team found that contextual features indicative of the periods of significance (1841-1865 and 1873-1892) are no longer present.¹ Consideration of the historic streetscape was dismissed because of the change in land use of the surrounding area from residential to a downtown business district. The House is listed in the National Register; there is nothing about the landscape that contributes to the House's eligibility. As a result, the cultural landscape and historic streetscape topic has been eliminated from further evaluation.

Archeological Resources

The area of consideration has undergone substantial disturbance. None of the alternatives anticipate any construction or activity that would cause further disturbance. Accordingly, the impact topic "Archeological Resources" will not be analyzed in this document.

Indian Trust Resources/ Ethnographic (Sacred) Sites

No sacred sites are known to exist within or adjacent to the site's boundary, nor are any of the lands within the site being held in trust by the Secretary of the Interior for the benefit of American Indians due to their status as federally recognized tribes. Therefore, this topic has not been further analyzed.

Socioeconomic Environment

NEPA requires an examination of social and economic impacts caused by federal actions.

Implementation of either Alternatives B or C might result in increased numbers of virtual visitors (visits through the worldwide web). On-site visitation might increase slightly because of elimination of the reservation requirement and the ability to handle larger groups in either Alternative A or B, but most visitation will continue to occur via the web. It is unlikely that the local governments or businesses in the vicinity would be economically affected to a significant degree by actions proposed in this GMP. By the same token, no proposed or anticipated actions would be likely to significantly impact residents of either the areas adjacent to the commercial downtown district or to metropolitan Canton. Therefore, the socioeconomic environment as an impact topic has been dismissed from further analysis.

The following natural resource impact topics were eliminated from further evaluation because the site is in an urban area that has been highly disturbed, and almost no natural resources remain at the site.

Air Quality

The Ohio Environmental Protection Agency (OEPA) determines air quality for the downtown Canton area in terms of ozone level and particulate standards. Current standards for air quality attainment require the ozone level to be less than .085 parts per million in an eight-hour period. Particulate matter must be 10 microns or less during this same period. In 2002, Canton exceeded the ozone level on 13 days, but never exceeded the particulate threshold. The OEPA considers downtown Canton to be "in attainment" of air quality standards.

Although the alternatives developed for the plan have varying levels of anticipated visitation, the visitor capacity of the public areas of the resource is limited. Projections of automotive traffic to the site in the next 15-20 years indicate that management alternatives developed for the facility would not result in an increase sufficient to cause any detectable adverse change in the ozone levels, hence, are not likely to cause Canton to lose air quality attainment status.

Understanding how the environment affects museum collections in storage and on exhibit, and how to monitor and control the agents of deterioration are the most important parts of a preventive con-

¹ Robert Young to Darlene Kelbach, et al., NPS internal email, 2 July, 2002.

servation program. The Secretary's standard requires parks with museum collections to ensure, to the extent possible, that the standard is met. A properly designed heating, ventilation and air conditioning (HVAC) system should maintain appropriate levels of relative humidity and temperature and filter particulate gases from the air. Installing an HVAC system that achieves and maintains the environment to acceptable levels is an on-going process. Using the appropriate HVAC filter and pre-filter systems to protect museum storage and exhibits mitigates the impact of contaminants, such as hydrogen sulfide, nitrogen dioxide, sulfur dioxide and ozone and oxygen that cause physical and chemical damage to collections. The site has such a system in place.

Because implementation of any alternative is not likely to cause adverse effects to either the outside or indoor air quality, this issue has been dismissed from further analysis as an impact topic.

Water Resources, Floodplains, and Wetlands

No intermittent or perennial streams flow within or adjacent to the project area. Implementation of the alternatives would not noticeably add to local water and waste-water treatment requirements. Therefore, impacts on the systems' capacity and the area's water quality would be negligible. The project area is not within a 100-year or 500-year floodplain. Additionally, the U.S. Fish and Wildlife Service's *National Wetland Inventory* map indicates that there are no wetlands within the project area. No impacts on water resources, floodplains, or wetlands would be anticipated from implementing any of the alternatives. Accordingly, this topic has been dismissed from further consideration.

Prime and Unique Farmlands

Because there are no farmlands in the project area, this topic will not be discussed.

Soils

None of the alternatives anticipate further development or expansion that would disturb soils. Further, these soils are in an urban, developed area, and have been disturbed previously. No construction outside the confines of the House or ERC is anticipated in any alternative. Therefore, construction called for in any alternative would have no impacts on soils. Accordingly, soil has been dismissed as an impact topic.

Vegetation and Wildlife

The project area is situated in a highly developed urban setting that has been cleared of natural vegetation. Vegetation and wildlife species in the area are those associated with human development in metropolitan areas. Because actions called for by this project would not impact vegetation or wildlife, this topic has been eliminated from further consideration.

Threatened or Endangered Species or Species of Special Concern

No federally or state-listed threatened or endangered species are known to exist in the project area, which is composed exclusively of disturbed habitats in an urban environment. No ecologically critical areas exist within, or adjacent to, the site's boundary. Accordingly, this topic has been dismissed as an impact topic in this document.

Chapter 2: Alternatives

Introduction

This section of the General Management Plan presents potential future directions for the First Ladies National Historic Site. The no-action alternative describes current management and trends, and serves as a baseline against which the action alternatives are compared. The draft action alternatives were developed from information gathered and analyzed through site visits, research, and workshops, as well as through meetings with the public, subject-matter experts, partners, and city, state, and Federal agencies. Because full implementation of any alternative could take several years, and resource conditions and opportunities could change, the planning alternatives are purposely general in order to provide flexibility.

Planning Process

Before the alternatives were developed, the planning team gathered and analyzed information on site resources, visitor use, and visitor preferences through consultation with government agencies and with the public through correspondence and public scoping.

Once the issues were understood, the planning team created prescriptive management zones and developed three preliminary alternative concepts describing what the site could look like in 15-20 years. These zones were applied to the site in a variety of configurations to achieve the concepts the team had developed.

Each alternative is intended to support the purpose and significance of the site, as well as address issues and concerns, avoid unacceptable resource impacts, respond to public wishes and concerns, and address the decision points for the GMP. Additionally, each alternative incorporates the interpretive themes and meets the visitor experience goals.

Finally, an evaluation process known as Choosing by Advantages was used to select and further develop the preferred alternative (Alternative B). Through this process, the planning team identified

and compared the relative advantages of each preliminary alternative according to a set of goals and six factors. The factors were: 1) preserve the House, 2) provide a range of visitor experiences, 3) involvement of operational partners, 4) range and diversity of partnerships, 5) preserve original collections, and 6) provide access to, and use of, collections (both in-house and outside collections). Comparing the advantages of each alternative helped the team understand the specific benefits of each alternative and resulted in the creation of a preliminary preferred alternative built from some of the best pieces of each original alternative. The costs of implementing the proposals also were considered.

Management Prescriptions

Management prescriptions describe the specific visitor experiences and resource conditions to be achieved and maintained, and the facilities necessary to achieve these conditions. Grounded in the site's purpose, significance, and mission goals, the prescription zones are tools for the on-the-ground integration of visitor use with resource management. During the process of formulating alternatives for future site conditions and management, these prescriptions were differently configured on each alternative to achieve the concept of that alternative. Once the prescriptions have been designated "on the ground", *i.e.*, mapped, they are referred to as zones.

In this GMP, both the House and the ERC have been mapped with management prescription zones (see pp. 18-19). Although the ERC is not currently owned by the NPS, Congress anticipated that the ERC eventually would become part of the First Ladies National Historic Site. For that reason, the GMP team has included prescription zones for the ERC. None of these zones will go into effect until the ownership of the City National Bank Building has been transferred to the NPS and falls within the site boundary.

Five management prescription zones were developed for the site. The following section describes each zone.

Administrative Zone

Resource Condition

The primary purpose of the administrative zone would be to carry out administrative services and operational support. The condition of the resources would be maintained to the highest degree possible consistent with this purpose. Modification of resources would be acceptable where necessary for development. This zone would not be located within an area of critical park resources.

Visitor Experience

The area is intended for use by staff, and visitors on official business. Under most circumstances, there would be no visitor access to the administrative zone.

Development

Facilities needed for administration and operations would be included in this zone. Such facilities might include offices, general office supply and equipment storage areas, mechanical equipment and utilities, and restrooms. All development would emphasize operational efficiency, environmentally sustainable practices, and human safety, would provide full accessibility, and would be designed to complement park resources. Where possible, there would be adaptive reuse of historic structures.

Historic Zone

Resource Condition

In the historic zone, emphasis is on the resource. A moderate level of impact on the resource would be allowed. Adaptive reuse practices balance modern uses within the historic zone and retain the resource's historic fabric to the extent possible.

Visitor Experience

The primary audience in the historic zone is the general public. The historic zone includes an interior and exterior component that would be accessible to visitors through organized staff-led or self-guided interpretive programs within the House. Typically, the probability of encountering other visitors and staff in the historic zone would be high in both the interior and exterior experiences.

Development

Limited seating would be available in the historic zone. Public facilities, such as restrooms, drinking fountains, and other services would be fully accessible.

Library Zone

Resource Condition

Resources in the library zone would be maintained at a high level of preservation, and would permit only low levels of allowable impacts.

Visitor Experience

In this zone, the primary audience would be researchers, historians, and others who would need little staff assistance. The library zone would provide self-directed study, rather than an interpretive experience. This zone would be easily accessible, with staff assistance.

Development

The library zone would contain offices and work space, carrels, study rooms, and information technology support. This zone would be adjacent to restrooms and other public facilities.

Managed Collection Zone

Resource Condition

This area would contain sensitive or fragile resources requiring special management through staff assistance. Only minimal allowable impacts would be anticipated. Emphasis in this zone would be on resource preservation. The visitor use would be managed intensively, and unaccompanied access would be restricted.

Visitor Experience

There would be little opportunity for individual exploration in this zone. The primary audience would be school groups that would experience a high degree of visitor-staff interaction through staff-conducted programs. Researchers wanting access to sensitive or fragile resources also would have a high degree of interaction with staff. Visitors would be able to observe in-house collections management programs and to participate in organized and scheduled collection preservation activities.

Development

Facilities appropriate to this zone would be those required for resource management, and would be consistent with preservation and protection objectives. This would be a high-security area with environmental controls. Restrooms and other public facilities would be located in adjacent zones.

Visitor Zone

Resource Condition

In the visitor zone, there would be moderate tolerance for impacts on the resource where necessary for essential visitor and operational needs. Efforts would be made to ensure the continued physical stability and good condition of the resource.

Visitor Experience

There would be a high level of opportunity for self-guided exploration and staff-led educational and interpretive programs in this zone. The primary audience would be the general public. There would be a moderate degree of visitor-staff interaction, while the probability of encountering other visitors would be high. The visitor zone would be highly accessible.

Development

Both permanent and temporary or changing exhibits, along with other facilities for orientation, interpretation, and education would be available in the visitor zone. Service facilities, such as restrooms and a sales area, would be appropriate in this zone.

The Alternatives

The alternatives, which are based on the park's mission, purpose, and significance, present different ways to manage and balance resources and visitor use, and improve facilities. The alternatives focus on which resource conditions and visitor experiences and opportunities should be available at the site, rather than on details of how resource conditions and experiences should be achieved. As a result, the alternatives do not include details on resource conditions or visitor use management practices. The implementation of any alternative also depends on future funding and staffing. The alternatives must satisfy requirements of the National Environmental Policy Act, including an

analysis that considers the full range of reasonable alternatives.

No-Action Alternative

Overview

This alternative describes conditions that currently exist at the site and would continue for the next 15-20 years. The no-action alternative establishes a baseline for comparing the environmental consequences of implementing each alternative, and analyzes the potential impacts of "staying the course." It is likely that visitors would not see any substantial change in the appearance or operation of the site, since the goal would be to preserve existing visitor experiences and activities and maintain the site's historic values.

No management prescription areas are identified. Current operations, with limited space, staff, and budget, would continue at the site. No additional property would be acquired or leased. There would be no change in facilities beyond routine maintenance and no major changes in visitor programs. The site would continue to be managed as it has been, with the exception that managers would follow the special mandates, laws and policies described earlier in this document. The parking situation would remain as it is now, with 17 parking spaces behind the House to the west and 38 spaces in the parking lot to the north (next to the Rotary Park).

Administration

The on-site personnel would continue to consist of the following: Unpaid staff — the president and vice president (both members of the NFLL board and full-time volunteers); Paid NFLL staff and contract employees — an executive director, administrative assistant, director of educational programming, facility manager, maintenance worker, cleaning person, historian/ researcher, bibliographer, cataloguer, part-time bookkeeper, receptionist/cashier, and three part-time clerical staff. The NFLL would continue to be responsible for administration, operations, and training. The NFLL would continue to file requests for reimbursement to cover NPS-approved costs of operating the site, through the authority of the Cooperative Agreement between the NPS and the NFLL. The NPS would continue to provide technical assistance and policy guidance. The NPS site manager would continue to be based off site.

Operations

Visitor orientation to the site would continue to occur on the first floor and lower level of the ERC. The House and the volunteer docents would remain under the management of NFLL, which would also be in charge of training and development of the volunteers. The NFLL would continue to contract with outside companies for maintenance of the facility and grounds, as needed.

Interpretive programs and other visitor services would remain at current levels. Visitors would continue to arrive at the site in cars, vans, and tour and school buses. There would be on-site parking for cars and vans. At this writing, plans are underway to create bus pull-off parking along 3rd Street. Until that bus parking becomes available, school buses and tour buses would have to park off the site.

Partnerships

The partnership between the NPS and NFLL would remain the same as described in the current Cooperative Agreement. No other partnership would be formed by either party. The NFLL would continue to secure technical expertise, conduct fund-raising through membership drives and granting agencies, and would continue to do the organizational paperwork. The NPS would continue to address budgetary issues and provide policy guidance and technical expertise as requested.

Programmatic Focus

The primary audience in the No-Action Alternative would be the general public and school groups. The NFLL would continue to acquire materials related to the lives of the First Ladies, their involvement with various social movements and policy-making decisions they may have influenced. The NFLL's programming efforts would continue to include lectures on topics relevant to the lives and the contributions of First Ladies, and their roles and influences in shaping our nation's history. The NFLL would continue to develop educational programs for students at various levels of study, and expand and manage the electronic annotated bibliography of books, manuscripts, journals, diaries and other materials written about and/or by the First Ladies.

Resource Management

The NFLL would continue to administer its collections management responsibility for the House museum and ERC library. Most collections would be stored on site, although there would be temporary off-site storage at times. The House would illustrate the public and private lives of the McKinleys. Traveling and permanent exhibits would continue to illustrate the public and private lives of the First Ladies. Ten rooms in the House would remain furnished to indicate the period in which the McKinleys resided there.

Education and Research Center (ERC)

The ERC would continue to provide visitor services through scheduled educational program offerings. In addition, the NFLL would continue management oversight of the electronic bibliography and all on-site collections.

Boundary Adjustment

The enabling legislation provides that the City National Bank Building, which houses the ERC, may be acquired by the NPS through donation from the NFLL. This GMP has been written under the assumption that the transfer of ownership will occur during the time period that this GMP is in effect. This transfer would occur even in the No-Action Alternative, because it is an element of the enabling legislation.

The Rotary Park and adjacent parking lot are located between the Saxton House and the ERC on South Market Street. If, in the future, the NFLL wishes to donate the Rotary Park and parking lot to the site, Congressional legislation would be required before those parcels could be included within the boundary.

Estimated Costs

The costs to the NPS of the actions of Alternative A over 20 years have been estimated at \$6.8 million – 9.9 million. This estimate is general and should be used only for comparing the alternatives. (See Table 2 , Range of Costs by Alternative, page 39)

Alternative A: Preserving history of First Ladies through partnerships

Overview

This alternative provides interpretation of the roles and significance of First Ladies through partnerships that share resources, collections, exhibits, and programs. Local businesses provide services such as parking, transportation, promotional materials, and grounds maintenance. The House and the ERC would be available for use by the NFLL, NPS, and future partners.

Administration

The NPS would provide technical expertise and policy guidance, while the NFLL would be responsible for day-to-day on-site administrative activities.

Operations

Under this alternative, the NFLL would provide docent training, supervise volunteers, and would be responsible for maintaining a docent/volunteer program. The NFLL also would manage the House and ERC. The NPS would provide technical assistance, such as policy guidance, planning, cultural resources management, and service contracts.

The NFLL would contract for grounds and mechanical maintenance services using NPS document requirements to develop a Scope of Work.

Partnerships

Alternative A relies upon partnerships with others to offer a full range of resources to benefit the public. Partnerships would be sought with women's history sites, the White House, historical societies, First Ladies organizations, and other interested organizations. Resources would include e-bibliography, museum collections, exhibits, interpretive programs, curriculum-based education programs, and research. In addition to museum collection and electronic bibliography, library, and other research materials, there would also be partners who offer technical assistance.

Organizations such as the Canton/Stark County Convention & Visitors Bureau would assist with orientation and marketing by distributing promo-

tional materials to local businesses, primarily restaurants, and hotels, cultural institutions, libraries, and other potential sites. Local businesses would provide such services as off-site parking and transportation. City bus routes would have stops within one or two blocks of the site.

Programmatic Focus

In this alternative, the stories of the First Ladies provide the overall programmatic focus. In the House, the emphasis is on interpretation of the role and history of First Ladies, rather than on the McKinleys. Visitors are encouraged to learn about the First Ladies through the use of exhibits and special in-house programs, changing in-house exhibits and traveling exhibits produced through partnerships. The House interior serves as a contextual backdrop or prop for the exhibits and staffed tours. Public education programs are predominately lectures, workshops, and seminars. The primary audience in Alternative A is the general public.

Resource Management

Under this alternative, the NPS and NFLL would acquire objects illustrating or depicting the contributions of all First Ladies, particularly with respect to their public role, for exhibits and interpretation. The NFLL would seek additional partners to provide off-site museum collections storage at an appropriate repository, when necessary. In this alternative, the furnishings, floor plan, and House décor are secondary to the focus on traveling exhibit installations featuring the private lives of all First Ladies. As much as possible, the collections would be stored on site in the House and ERC. When necessary, collections would be stored off site in other repositories.

Education and Research Center (ERC)

In alternative A, the main focus of the ERC is the research library. The first floor and lower level of the building would accommodate varied visitor services and scheduled programming offered by NPS, NFLL, and other partners.

Boundary Adjustment

The enabling legislation provides that the City National Bank Building, which houses the ERC, may be acquired by the NPS through donation from the NFLL. This GMP has been written under

the assumption that the transfer of ownership will occur during the time period that this GMP is in effect.

The Rotary Park and adjacent parking lot are located between the Saxton House and the ERC on Market Avenue South. If, in the future, the NFLL wishes to donate the Rotary Park and parking lot to the site, those parcels will be included within the boundary. Congressional legislation is not required to accept donation of the Rotary Park and parking lot. Parcels of this size can be added to the site under the Land and Water Conservation Fund Act by publishing a notice in the *Federal Register* and notifying the appropriate Congressional delegation.

Estimated Costs

The costs to the NPS of the actions of Alternative A over 20 years have been estimated at \$7 million – 10 million. This estimate is general and should be used only for comparing the alternatives. (See Table 2, Range of Costs by Alternative, page 39)

Alternative B (Preferred): Wide variety of visitor experiences

Overview

This alternative would provide a wide variety of methods of interpreting the significance of all First Ladies and their public and private lives by combining elements of traditional on-site visitation with an emphasis on scholarly research on the First Ladies and associated historical events. This concept would offer diverse experiences to a broad range of visitors, from the general public to educational groups and researchers.

The NFLL would have primary responsibility for administration and daily on-site operations. NPS would have limited responsibilities, which might include NPS participation in site orientation, interpretation, educational programming, and resource preservation activities. In this alternative, the NFLL would seek museum accreditation for the House.

Administration

In alternative B, the NPS may provide technical assistance, policy guidance, planning, staff and

docent training, and volunteer development assistance. The NFLL would be primarily responsible for daily on-site administrative functions. The NPS would have limited responsibility for daily on-site administration, but would provide additional on-site administrative assistance if the NFLL requested it.

Operations

The NFLL would be responsible for recruitment and management of staff and volunteers. NPS may provide assistance with designing staff, docent and volunteer training and development practices, coordinating traveling exhibitions and exhibit installations, and developing orientation and education/interpretive programs. These plans and programs would be implemented primarily by NFLL staff and volunteers; NPS may have some implementation responsibility. The NPS would provide technical assistance in such areas as policy guidance, planning, cultural resource programming, collections management, and service contracts. The NFLL would contract for grounds and facility maintenance services for the House and ERC, as needed. In this alternative, the House would have museum accreditation.

Partnerships

The NPS and NFLL may seek partners with marketing and promotion expertise to publicize the site. Additionally, the site might coordinate with other institutions and non-profit organizations to arrange traveling and changing exhibits. Other partners would provide knowledge and expertise in performing arts and web-based programming.

Programmatic Focus

The programmatic focus of the site would be the public roles and private lives of First Ladies and their significant contributions to American history. The primary audience is a broad spectrum of visitors — those with a general interest, as well as school groups, community groups, and researchers. Visitors would learn through a variety of interpretive techniques and educational portals. Emphasis would be placed on encouraging self-discovery and self-directed learning through experiential activities while on site. The interpretive story would be presented for diverse audiences in ways that engage attention and emotion, provoke thought and reflection, and relate to contemporary issues. A new visitor contact area in the ERC would be the primary focal point for information

and on-site orientation, in addition to offering interpretative elements.

Alternative B would develop a robust outreach program to provide relevant information about the site to a broad range of potential visitors, from the unscheduled casual visitor to avocational historians, museum curators, historic preservationists, and school groups. The site would offer experiential activities on site and guided tours, as well as encourage self discovery and self-directed learning opportunities.

Resource Management

Under this alternative, the NPS and NFLL would acquire objects illustrating the public and private roles, and the social and political impacts, of the First Ladies for exhibits and interpretation. To the extent possible, the museum collection would be stored on site and exhibited and/or accessible to the visitors in public areas. All collections, including new acquisitions, would be inventoried and cataloged to establish baseline accountability consistent with NPS museum management policy and guidelines. There would be an on-site conservation laboratory. When necessary, the NPS and NFLL would seek additional partners to help identify other curation repositories that meet NPS standards to ensure long term preservation and protection for museum collections

The House would be managed to accommodate permanent exhibit spaces and interpretive activities, although occasionally there would be traveling exhibits for special events and outreach programs. Museum professionals would carry out collection management functions. In this alternative, the furnishings and décor of the house serve as a backdrop for the exhibits. Additionally, the NPS and NFLL would introduce high-quality reproductions in the outreach programs.

Education and Research Center (ERC)

The ERC would allow for greater use in educational programming based on current research, and would provide adequate space for the museum and library to ensure proper curation of the collections. The first floor and lower level of the building would accommodate visitor services and scheduled programming. Programs related to archives and curation would be offered to school and other groups on the 4th and 5th floor library and managed collections areas.

Boundary Adjustment

The enabling legislation provides that the City National Bank Building, which houses the ERC, may be acquired by the NPS through donation from the NFLL. This GMP has been written under the assumption that the transfer of ownership will occur during the time period that this GMP is in effect.

The Rotary Park and adjacent parking lot are located between the Saxton House and the ERC on Market Avenue South. If, in the future, the NFLL wishes to donate the Rotary Park and parking lot to the site, those parcels will be included within the boundary. Congressional legislation is not required to accept donation of the Rotary Park and parking lot. Parcels of this size can be added to the site under the Land and Water Conservation Fund Act by publishing a notice in the *Federal Register* and notifying the appropriate Congressional delegation.

Estimated Costs

Figuring in the estimated expenses related to accreditation of the House as a museum, the costs of the actions of Alternative B over 20 years have been estimated at \$10.2 million – 14.7 million. This estimate is general and should be used only for comparing the alternatives. (See Table 2, Range of Costs by Alternative, page 39)

Alternative C: Research facility and access to primary and secondary sources

Overview

This alternative combines elements of traditional on-site visitation with an emphasis on scholarly research on the roles and impacts of the First Ladies and associated events. To achieve this concept, the NFLL would actively seek accreditation for the ERC as a research facility and also would seek museum accreditation for the House. A professional reference librarian would be available through the NPS and other partners to provide access to the collections and to provide technical assistance to researchers and students.

Administration

The NPS would provide technical assistance, policy guidance, and an on-site research professional. The NFLL would be responsible for day-to-day administrative activities.

Operations

The NPS and NFLL would share some aspects of site management under this alternative. The NFLL would coordinate programs, schedule tours, supervise docents and volunteers in both the House and the ERC, and would be responsible for their training and development. The NFLL also would manage the House museum. The NPS would provide technical assistance in such areas as policy guidance, planning, cultural resources management, and service contracting. Additionally, the NPS would provide an on-staff research professional. The NFLL and NPS collaboratively would plan and prepare exhibits and educational and interpretive programs offered at the House and ERC. The ERC would be accredited as a research facility, and the House would be accredited as a museum.

Partnerships

In this alternative, with its emphasis on scholarship and research, the NPS and NFLL would promote the site through colleges and universities, and by marketing to affiliated professional associations. Partners would be sought who could provide expertise in bibliographic database management.

Programmatic Focus

The target audience in this alternative is researchers. The program emphasis is on research and use by educational groups and scholars nationally and internationally. The ERC would be staffed by a professional research librarian, and technical experts would be available to provide assistance.

There would be a concerted effort to share the progress of the research projects through public forums such as roundtables featuring historians and other professional researchers and students of American politics, with a focus on research-based education and interpretive programming.

The site would provide access to the histories of each First Lady, her role and significant impacts

she had during the course of her public and private life. The story of Ida (Saxton) and William McKinley would be of secondary importance in this alternative.

Resource Management

The library collection would be an internationally known, comprehensive annotated electronic bibliographic library augmented by a collection containing printed material and small personal artifacts associated with each of the First Ladies. As the collection expands, it is conceivable that the collections would outgrow the existing storage space. In that case, additional museum-quality off-site storage would be sought. The bulk of the on-site collection, housed in the ERC, would be original or period objects, primary source material, authors' notes, research materials, and associated records. Museum objects on exhibit would be secure from loss or damage, and cases would be climate controlled. There would be an on-site conservation laboratory. Exhibited objects and all new acquisitions would be cataloged and curated consistent with NPS policy and guidelines.

The emphasis in the House would be on illustrating the private lives of all First Ladies using original museum objects with a direct association to the First Ladies. Changing and permanent exhibits at the House would interpret the lives and contributions of First Ladies. All objects on exhibit in the House would have received conservation treatment and be considered stable and in good condition.

Education and Research Center (ERC)

In this alternative, the focus of the ERC is the research library dedicated to the history of First Ladies with expanded assisted access to closed stacks and collections for qualified researchers. Additionally, the lower level and first floor of the building would accommodate visitor services and on-site educational functions.

Boundary Adjustment

The enabling legislation provides that the City National Bank Building, which houses the ERC, may be acquired by the NPS through donation from the NFLL. This GMP has been written under the assumption that the transfer of ownership will occur during the time period that this GMP is in effect.

The Rotary Park and adjacent parking lot are located between the Saxton House and the ERC on Market Avenue South. If, in the future, the NFLL wishes to donate the Rotary Park and parking lot to the site, those parcels will be included within the boundary. Congressional legislation is not required to accept donation of the Rotary Park and parking lot. Parcels of this size can be added to the site under the Land and Water Conservation Fund Act by publishing a notice in the *Federal Register* and notifying the appropriate Congressional delegation.

Estimated Costs

Figuring in the costs of accreditation of both the House and ERC, the costs of the actions of Alternative C over 20 years have been estimated at \$10.3million – 14.8 million. This estimate is general and should be used only for comparing the alternatives. (See Table 2, Range of Costs by Alternative, page 39)

Environmentally Preferred Alternative

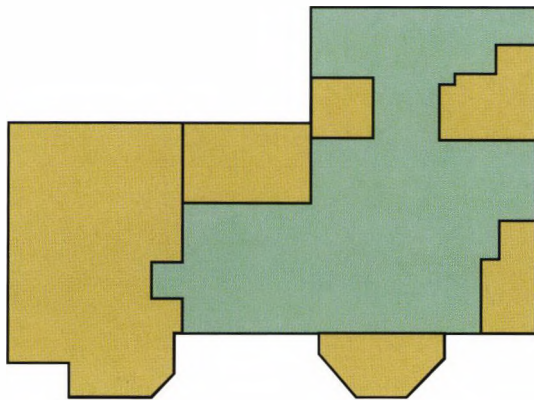
The environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed in Section 101 of NEPA. This alternative is determined by applying the criteria suggested in NEPA and guided by the Council on Environmental Quality. This means the alternative that would cause the least damage to the biological and physical environment; it also means the alternative that would best protect, preserve, and enhance historic, cultural, and natural resources. Although all alternatives in this plan rated well, the preferred alternative (Alternative B) best met the criteria, so it is also the environmentally preferred alternative.

NEPA lists six criteria for selecting the environmentally preferred alternative:

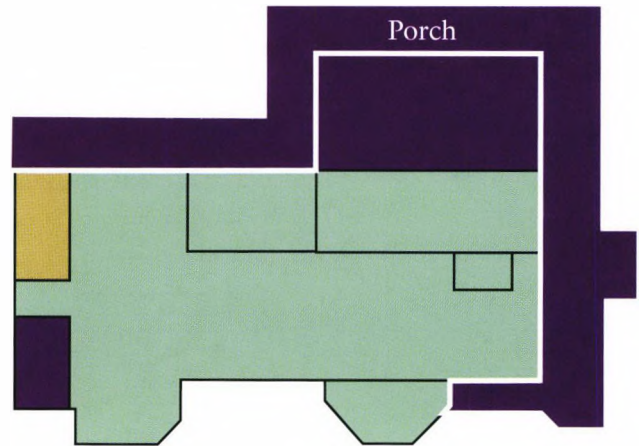
1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
4. preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
5. achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

In the process used to select the preferred alternative, Alternative B was found to have the best overall potential for protecting and preserving the historic and cultural resources of First Ladies National Historic Site. Actions under this alternative maximize protection of cultural resources while concurrently attaining the widest range of neutral and beneficial uses of the environment without degradation. More of the collections would be preserved and protected under this alternative than under either of the other alternatives. New construction, if any, would be limited to a small area within the House. Alternative B maintains an environment that supports diversity and variety of individual choice, and achieves a balance between visitors and resources.

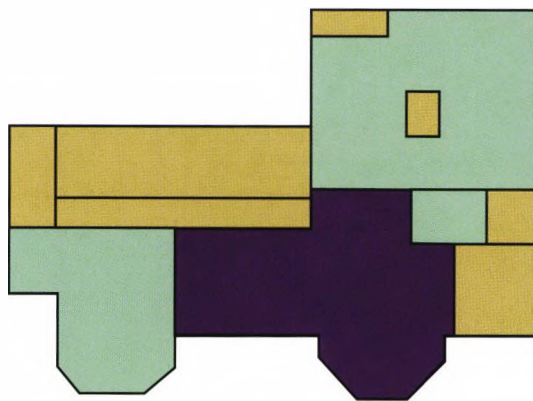
Management Zones
Alternative A:
Preserving history of First Ladies through partnerships



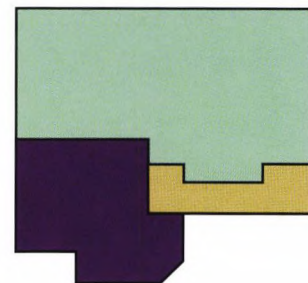
Lower Level



First Floor



Second Floor



Third floor



First Ladies
National Historic Site
Saxton House
National Park Service
U.S. Department of the Interior

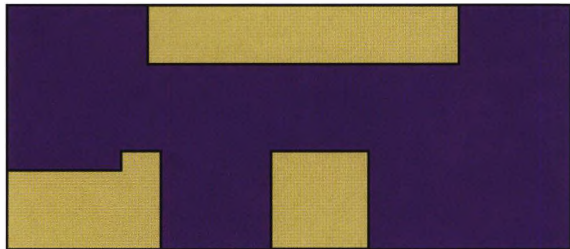
Alternative A: Preserving history of First Ladies through partnerships



Third Floor



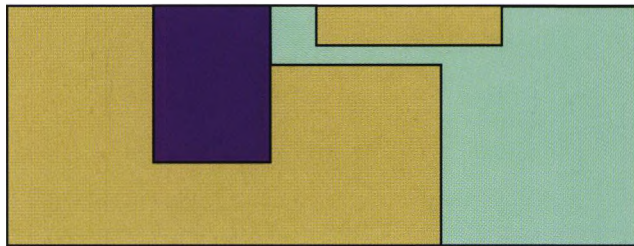
Sixth Floor



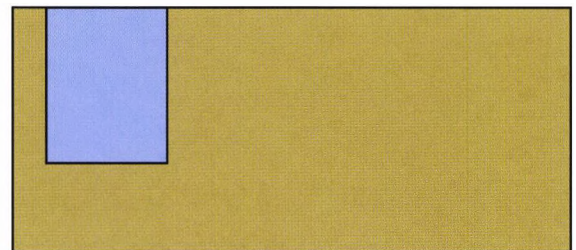
Second Floor



Fifth Floor



First Floor



Fourth Floor



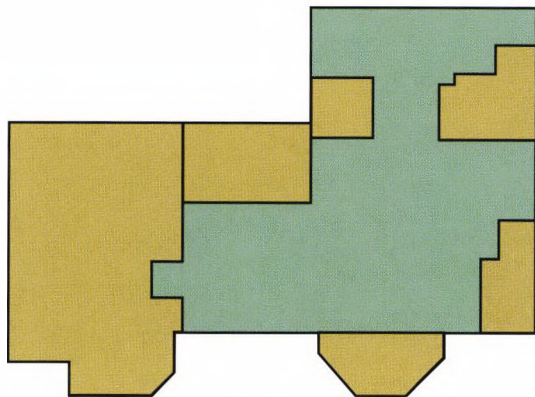
Lower Level

-  Library
-  Visitor
-  Administrative
-  Collections

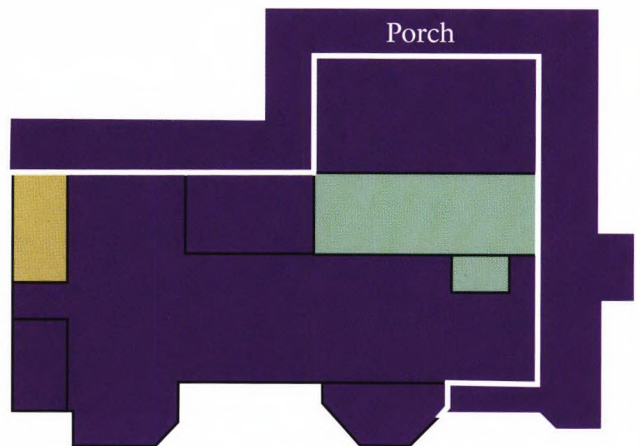


First Ladies
National Historic Site
**Education and
Research Center**

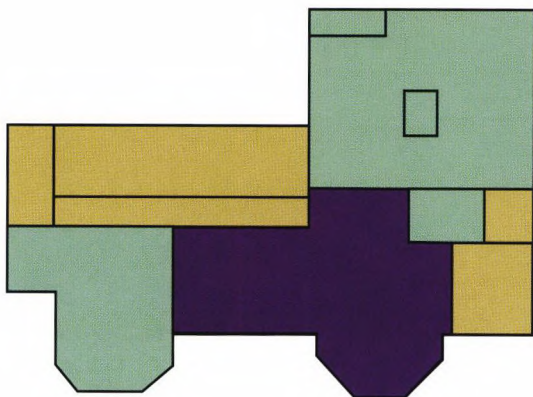
Management Zones Alternative B: Wide variety of visitor experiences



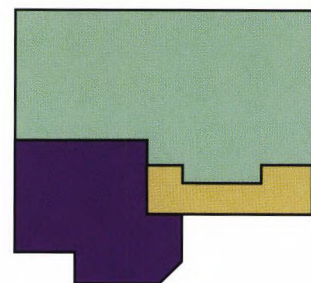
Lower Level



First Floor



Second Floor



Third floor



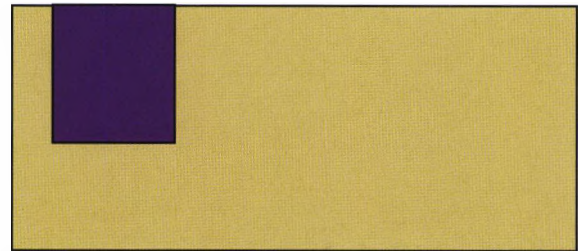
First Ladies
National Historic Site
Saxton House

National Park Service
U.S. Department of the Interior

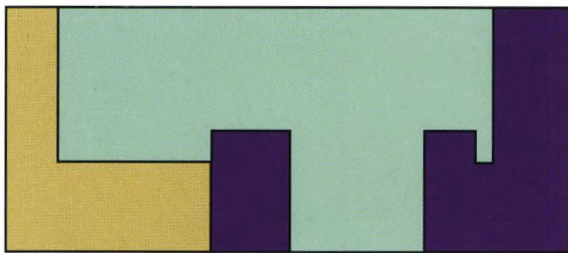
Alternative B: Wide variety of visitor experiences



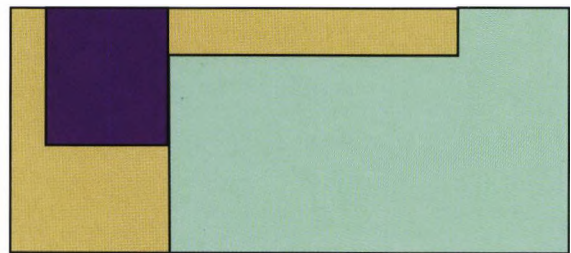
Third Floor



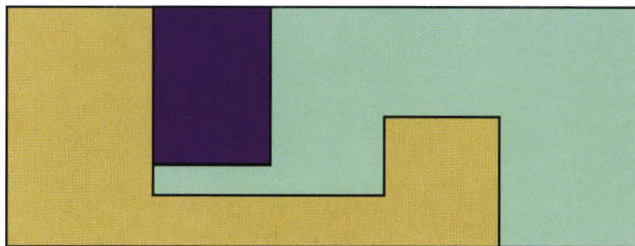
Sixth Floor



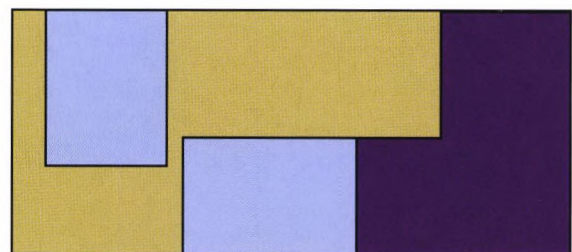
Second Floor



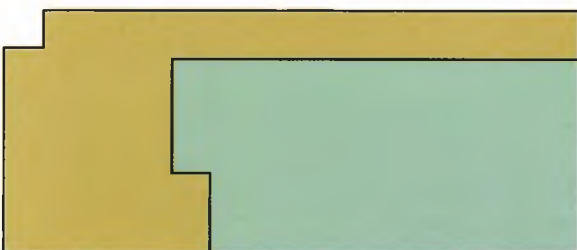
Fifth Floor



First Floor



Fourth Floor



Lower Level

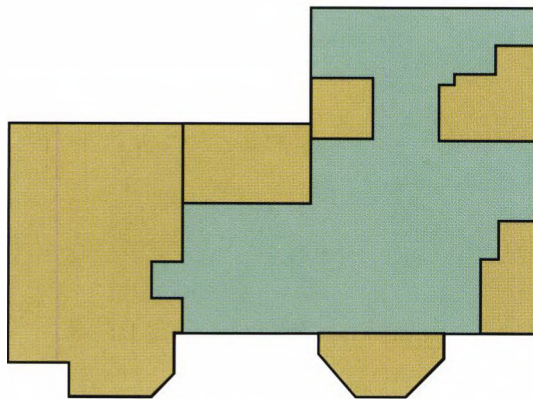
-  Library
-  Visitor
-  Administrative
-  Collections



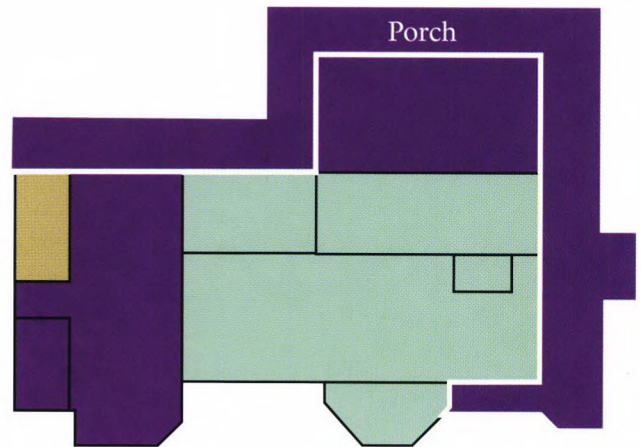
First Ladies
National Historic Site

**Education and
Research Center**

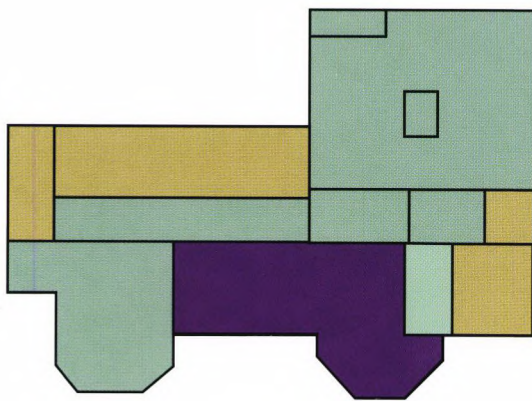
Management Zones Alternative C: Research facility



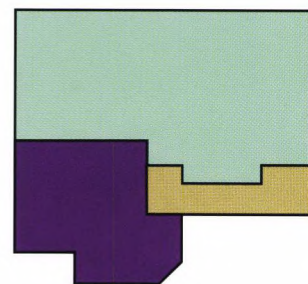
Lower Level



First Floor



Second Floor



Third floor



First Ladies
National Historic Site
Saxton House

Alternative C: Research facility



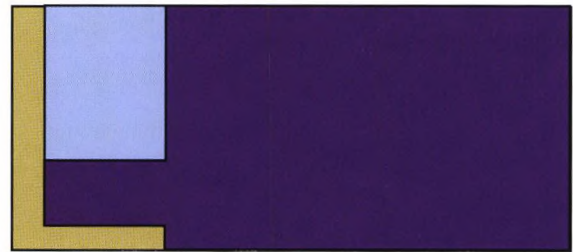
Third Floor



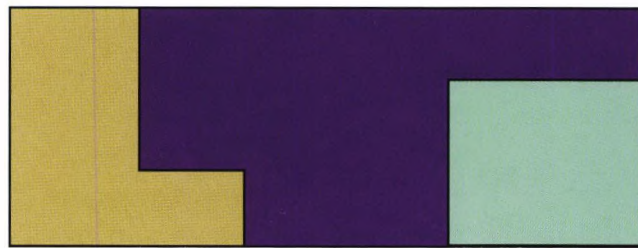
Sixth Floor



Second Floor



Fifth Floor



First Floor



Fourth Floor



Lower Level

-  Library
-  Visitor
-  Administrative
-  Collections



First Ladies
National Historic Site

**Education and
Research Center**

The following table lists the estimated range of costs for each alternative, rounded to the nearest 1,000. These costs were determined through a standard life-cycle costing method. The initial one-time costs are those that bring the facilities up to Secretary's standards for exhibits, museums, and curation and also would place the park in a position to request accreditation. This analysis also assumes that the initial one-time costs occur in Year One; in reality, these costs would occur as needed throughout the entire 20-year period. Because the sole purpose of this chart is to compare estimated costs of the alternatives, the figures do not take inflation into account.

Table 1: Range of Costs by Alternative

	No-Action	Alternative A	Alternative B	Alternative C
Initial one-time costs – Total Upgrades to existing equipment, construction as needed to accommodate exhibits and collection storage, other costs.	Not applicable	Not applicable	\$274,000 – 395,000*	\$262,000 – 377,000*
Recurring annual costs Staff salaries, maintenance, and general (includes supplies and materials, artifacts, travel and training, utilities and services, and miscellaneous costs).	\$623,000 – 935,000	\$635,000 – 953,000	\$822,000 – 1,234,000	\$802,000 – 1,202,000
Total Life-Cycle Costs Calculated for 20 years at 7% discount rate at range +/- 20% (Includes initial one-time costs as well as recurring annual costs).	\$6.8 million – 9.9 million	\$7 million – 10.1 million	\$9.3 million – 13.5 million	\$9.1 million – 13.1 million

*The accreditation costs associated with the on-site assessment (\$9,000 – 10,000) and re-certification are not factored into the cost estimates provided in this table. Accreditation costs could be covered by one or both of the partners, another organization or entity, through a grant, or by some other method.

Table 2: Summary of Alternatives

	No-Action	Alternative A	Alternative B	Alternative C
Overview	This alternative describes conditions that currently exist at the site and would continue for the next 15-20 years.	This alternative provides interpretation of the roles and significance of First Ladies, and resource preservation, through partnerships that share resources, collections, exhibits, and programs.	This alternative provides interpretation of the significance of First Ladies and their public and private lives through diverse visitor experiences.	This alternative combines elements of traditional on-site visitation with an emphasis on scholarly research on the First Ladies and their impacts on American society, culture, and politics.
Administration	NFLL responsible for administration and day-to-day on-site activities. NPS provides technical expertise and policy guidance.	NFLL responsible for administration and day-to-day on-site activities. NPS provides technical expertise and policy guidance.	NFLL and NPS may share responsibility for daily on-site administration. NPS provides technical expertise and policy guidance, and may provide assistance in planning, training and development.	NFLL responsible for day-to-day on-site activities. NPS provides technical expertise, and policy guidance.
Operations	NFLL manages volunteers, House, and ERC. NFLL responsible for volunteer training and development, interpretation, and visitor services.	NFLL manages volunteers, House, and ERC. NFLL responsible for volunteer training and development, interpretation, and visitor services. NPS provides technical expertise for those activities.	NFLL has primary responsibility for managing the site. NPS has limited responsibility, unless assistance requested by NFLL. NPS may provide assistance with training and development of staff and volunteers, and with planning and preparing exhibits, information, orientation, and education/ interpretation programs. Implementation primarily by NFLL. NPS may provide some staff for implementation.	NFLL manages volunteers, House, and ERC. NFLL responsible for volunteer training and development. Museum and library volunteers managed by NFLL; NPS provides on-staff research professional.

Table 2: Summary of Alternatives continued

	No-Action	Alternative A	Alternative B	Alternative C
Operations continued	Neither House nor ERC are accredited. NFLL hires facility and grounds manager; contracts with companies for these services as needed. On-site parking (includes bus lot).	Neither House nor ERC are accredited. NFLL contracts for maintenance services based on a Scope of Work prepared by NPS. On-site parking (includes bus lot). Off-site parking and transportation to the site provided by local businesses through partnerships.	House accredited as museum. ERC is not accredited. NFLL hires facility and grounds manager; contracts with companies for these services as needed. On-site parking (includes bus lot).	ERC accredited as research facility; House accredited as museum. NFLL responsible for day-to-day on-site activities. NPS provides technical expertise, and policy guidance. On-site parking (includes bus lot).
Partnerships	NPS-NFLL partnership continues under Cooperative Agreement; no other partnerships would be formed by either party.	NPS-NFLL partnership continues. Partnering with others to share resources, collections, exhibits, programs, curriculum-based programs, and research.	NPS-NFLL partnership continues. May partner with others for marketing and promotion, travelling exhibits, and for expertise in theatrical programming, living history, and worldwide web.	NPS-NFLL partnership continues. Partnering with others for scholarship and research, and for expertise in database management/ electronic library and collections access.
Programmatic Focus	Primary audience is general public and school groups. Focus on public roles and private lives of First Ladies, and on the McKinleys.	Primary audience is general public. Focus on public and private lives of First Ladies, less on McKinleys.	Broadest spectrum of visitors, e.g., general public, school groups, community groups, and researchers. Focus on public and private lives of First Ladies, and significant contributions of First Ladies, less on McKinleys.	Primary audience is scholarly researchers. Focus on public and private role, and personal history of every First Lady; less focus on McKinleys.

Table 2: Summary of Alternatives continued

	No-Action	Alternative A	Alternative B	Alternative C
Programmatic Focus continued	Public education through lectures, education programs, website information.	Public education through lectures and seminars.	Strong outreach programs Experiential activities on site, guided tours. Encourage self-directed learning.	Public roundtables include professional researchers.
Resource Management	Collection contains objects re public roles and private lives. Collections stored on site in ERC. Temporary off-site storage when necessary. House illustrates the public roles and private lives of the McKinleys; traveling and permanent exhibits and activities illustrate public roles and private lives of First Ladies. Ten rooms furnished to period indicative of McKinleys.	Collection contains objects re public role. Collections stored on site in ERC and House, insofar as possible. When necessary, collections are stored off site in other repositories. House illustrates the private lives of First Ladies; accommodates travelling and permanent exhibits.	Collection contains objects re public roles and private lives. Collection stored on site consistent with NPS museum management guidelines; additional storage space may be created in order to keep collections on site. Museum collection management functions carried out by museum professionals. Collections are exhibited and/or otherwise made available to public. House illustrates the private lives of First Ladies; accommodates permanent exhibits and activities more than traveling exhibits.	Internationally renowned, comprehensive collection of written material and objects associated with First Ladies. Collection storage off site. Focus on primary source material and authors' notes/research materials/working files. Museum collection management functions carried out by museum professionals. House/museum illustrates the private lives of First Ladies. Accommodates only permanent exhibits.

Table 2: Summary of Alternatives continued

	No-Action	Alternative A	Alternative B	Alternative C
Resource Management continued	ERC houses collections, provides educational programming, and offers some visitor services and programs.	ERC primarily research facility and library.	ERC primarily research facility and library, but also managed to allow greater use in educational programming. Research is transferred/translated into educational and interpretive programs.	ERC primarily research facility and library.

Chapter 3: Affected Environment

Introduction

This chapter describes the existing environment that could be affected by actions proposed in this general management plan. Included here are the specific topics that were analyzed to determine the environmental impacts of the alternatives. These topics were selected based on federal law, regulations, executive orders, NPS expertise, and concerns expressed by other agencies or members of the public during scoping. The conditions described established the baseline for the analyses of effects found in the “Environmental Consequences” chapter.

Cultural Resources

The National Park Service acknowledges the inherent value and significance of cultural resources as part of a single national heritage. The preservation, protection, and documentation of cultural resources require thoughtful planning for appropriate, long-term management. The NPS accomplishes the mission through thoughtful planning processes that originate from broader plans, such as this general management plan, to more specific operational and implementation plans that establish accountability. Stewardship of park cultural resources is accomplished through a holistic strategy that ensures unimpaired enjoyment for all future generations.

The National Park Service preserves and fosters an appreciation for cultural resources in its custody, and demonstrates stewardship oversight through appropriate programming and interpretation using baseline research and scholarship.

Research conducted by NPS personnel, contractors, and cooperative researchers is peer-reviewed, both inside and outside the Service, to ensure that it meets professional standards and reflects current scholarship. The data and knowledge acquired through research are recorded on permanent and durable media formats for long-term preservation. In addition, documentation and project records are integral to understanding the resources and inform management decision-making. Adequate

research supports informed planning and compliance with legal requirements and should be integrated into park resource management decisions, new development plans, and other resource management activities that might affect cultural resources.

The Ida Saxton McKinley House

The three-story brick Second Empire enlargement of the House reflects the prosperity of John Saxton’s son, James, founder of the Stark County Bank. The large wrap-around porch extends out from the building core. Five stone steps lead up to the porch’s central projecting pavilion marking the location of the door. The porch rests on a cut-stone base. Regularly spaced chamfered posts with base, shaft, and scrolled bracket capitals support the frieze board containing center keystones and a molded cornice line. The balustrade atop the porch roof consists of a row of circular rings running between the corner posts.

The first floor façade has a central door with fan-light transom and sidelights. Two floor-to-ceiling four-light double-hung sash windows flank the door. The windows feature cut stone lug sills and segmental arch top lights matched by segmental arch hoods with an emphasized key stone. The second floor façade has virtually the same fenestration, although the windows are not as tall. With the exception of the central bay, the second floor windows have the same hoods, sills, and sash arrangements as the first floor fenestration. A projecting cornice supported by paired scrolled brackets marks the roof/wall junction. Modillions line the frieze board running between the brackets. The cornice is broken by a central third floor wall-dormer.

The third story is a lower hip of the fish-scale, slate shingle mansard roof. Molded sheet metal flashing marks the top, bottom, and ridge lines of the roof. Barrel-vaulted dormers sheathed in sheet metal mark the attic windows. Heavy scrolls at each jamb base further accentuate these round hood windows. A projecting barrel-vaulted canopy supported by brackets, chamfered posts and sur-

rounds with scrolled bases covers the center wall dormer. The dormer's surrounds contain five applied wooden ornaments with leaf motifs. Six chimneystacks pierce the lower slope of the mansard or the top hipped slope.

The south elevation features two two-story bays flanking a recessed porch. The mansard roof caps the front bay, while a hipped roof caps the other. Two dormers similar to the roof dormers on the main façade are located on the south elevation's mansard roof. The rear bay was probably added to the 1841 core during the 1865 remodeling. The north elevation contains the bulk of the large wrap-around porch. A side door leading to a disability access ramp is located where the north elevation meets the rear. A brick and stone plaza with decorative trees abuts the north side of the house. A small rear porch with chamfered posts and scrolled brackets is located in the back wall of the north elevation's second bay and provides access into the 1841 section of the house.

In 1920, a brick commercial building was attached to the front façade, completely removing the porch and first floor façade and interior. Additional alterations prior to the restoration included a single story cinder block addition running the length of the north elevation, enclosing the area between the two south elevation bays, and enclosing a rear porch. The front porch and the first floor façade were reconstructed in 1980.

The stone and brick basement contains four rebuilt fireplaces and an unusual system of pits and channels. The only original material on the first floor is a segmental arched and molded framework for a south-side projecting bay. These pieces were copied for the reconstruction of the first floor interior. The reconstructed and rehabilitated first floor interior consists of a wide central hall flanked by two full-length parlors. A winding walnut staircase is located at the rear of the first floor. Two rooms are located in the rear portion — one is thought to have been the kitchen and the other, the dining room. The second floor retains much of the original door and window surrounds and room configurations. The third floor ballroom has much of the original woodwork and flooring intact.

Education Resource Center (ERC)

The ERC is housed in the City National Bank Building, located three lots north of the House on

Market Avenue. This National Register-listed commercial building is a six-story masonry Richardsonian Romanesque Revival-style building. The façade of the building consists of a two-window wide central spandrel flanked by single window piers. The rusticated ashlar block face and the highly plastic heavy decorative elements, such as engaged grouped columns, saw tooth stone frieze panel, dentil rows, molded cornices, and heavy projecting window arches, create a highly sculptural wall surface that is one of the hallmarks of the style. Alternating rows and groupings of arched and flat head windows, the slightly projecting piers, and variously sized and textured string-courses add to the visual interest and activity of the façade. The entry level consists of smooth-faced stone, a stepped-down basement entry, side entry door with large columns, and balustrade parapet. Adjacent to the door are three large display windows separated by squared columns with scrolled corner brackets. Above the windows is a frieze panel with the name block "City National Bank".

Museum Collection, Archives and Library

Throughout the house, the NFLL has punctuated the historic setting with exhibits relating to the First Ladies. There are several 19th century display cases donated by the Smithsonian Institution, as well as newer display cases, all of which feature original correspondence, portraits, books, and commemorative pieces by or related to the First Ladies.

Only a few items have a genuine association with the house: some portraits, which are exhibited in the reproduction law office. The NFLL has supplemented these items with a mix of 19th century furnishings and reproductions to provide a sense of the Saxton House's historic appearance. Upstairs, William McKinley's office has been outfitted with period pieces and reproduction carpeting and wallpapers to imitate a historic photograph. The Wilton reproduction carpet has an 1890 tapestry Rococo pattern.

A chandelier from the historic period, though not original to the House, hangs in the third floor ballroom, which has been rehabilitated to accommodate a conference/research function. The walls bear 81 portraits of the First Ladies. Although, for the most part, the portraits are reproductions, this is the only collection in the country where all the First Ladies' portraits can be viewed in one place.

Electronic resources (annotated bibliography collection) that are represented in two- or three-dimensional format will be preserved in the archives, and manuscript collections will be managed according to current museum standards and practices to ensure a robust and easily captured, accessible information management resource. (*Management Policies* 5.3.5.5.6, Archives and Manuscripts.)

Visitor Experience

Currently, the visitor contact area is located on the first floor and lower level of the ERC. There, visitors can view several exhibits and short documentaries. There is seating for 90 people, and restrooms are available. Because of the space constraints, reservations are required for tour groups of ten or more. Individuals and groups may call ahead to make reservations for a guided tour. Groups of more than 20 people are split into two or three subgroups. While one subgroup is touring the House, the other members of the group tour the ERC.

Education and Interpretation

Docent training sessions are scheduled regularly, and special sessions are held each time an exhibit changes. Interpretive programs continue to be developed. Exhibit space is limited; exhibits are changed regularly to follow a specific theme or to cover a particular First Lady or group of First Ladies. Limited public education programming occurs within the ERC. NFLL educators, interpreters, and volunteers provide orientation to the site in the lower level of the ERC. The ERC provides some scheduled programming. Visitors may access library collections by appointment.

Educational programs are presented in local schools by NFLL staff educators and volunteers. These programs are coordinated with the educational community to ensure their connection with the required school curriculum and evaluations.

Chapter 4: Environmental Consequences

Introduction

The National Environmental Policy Act (NEPA) requires that environmental documents discuss the environmental impacts of a range of reasonable alternatives and any adverse environmental effects that cannot be avoided should any of the alternatives be implemented. This chapter analyzes the environmental impacts of the four management alternatives, including the no-action alternative, on cultural resources (historic property and collections) and visitor experience. This analysis provides the basis for comparing the effects of the alternatives.

Methodology

The planning team based the analysis of environmental consequences on a review of existing literature and park studies, as well as information provided by NPS staff and subject matter experts within and outside of the NPS. The team identified impacts by comparing the potential effects of the evaluated alternatives to existing conditions as described in Chapter 3, “Affected Environment.” In addition, as described in the “Mitigation” section of Chapter 4, each alternative would incorporate mitigation measures, as appropriate, to avoid or minimize impacts.

In accordance with the National Environmental Policy Act (NEPA), evaluation of environmental impacts requires consideration of the intensity, duration, and cumulative nature of impacts, as well as a description of measures to mitigate impacts.

Type

For all impact topics, the following definitions were applied.

Direct: An effect that is caused by an action and occurs in the same time and place as that action.

Indirect: An effect that is caused by an action, but occurs later in time or is farther removed in distance, yet is still reasonably foreseeable.

Cumulative Impacts

Cumulative impacts are impacts on the environment that result from the incremental (*i.e.*, additive) impacts of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place during a period of time.

Cumulative impacts analyzed in this document consider the incremental effects of the no-action alternative and each of the action alternatives in conjunction with past, current, and future actions at the site. These actions include implementation of relevant portions of the *Downtown Development Plan* for Canton, Ohio. Two important components of this plan are development of the area adjacent to the site as part of an enhanced “cultural corridor,” a 25-square block “Hot Zone” for wireless internet access, and the development of the Downtown Canton Center Concept, an area within four blocks of the site, as a retail center. Another alternative considered in the *Downtown Development Plan* would involve construction of a convention center adjacent to the McKinley Grand Hotel, which is located across Market Street from the site. These projects do not have scheduled start or completion dates.

Impairment of Park Resources and Values

The team has determined that implementation of any of the alternatives would not constitute impairment of the resources and values of First Ladies National Historic Site. This conclusion is based on a thorough analysis of the environmental impacts described in the environmental impact statement.

In determining whether impairment may occur, park managers consider the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative

effects of the impact in question and other impacts.

An impact to any park resource or value may constitute an impairment. According to NPS policy, an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified as a goal in the park's general management plan or other relevant NPS planning document.

This policy does not prohibit impacts to park resources and values. The NPS has the discretion to allow impacts to park resources and values when necessary and appropriate, so long as the impacts do not constitute impairment of the affected resources and values. Moreover, an impact is less likely to constitute an impairment if it is an unavoidable result, which cannot reasonably be further mitigated, of an action necessary to preserve or restore the integrity of park resources or values. (*NPS Management Policies 2001*, Sec. 1.4.5) A determination of impairment is made within each "Conclusion" section.

Mitigation

Under all alternatives, the site managers would mitigate impacts arising from increases in visitation, development of additional access or storage, construction for parking, and increased development and traffic outside the park boundaries. All mitigation measures would be undertaken in consultation with the Ohio SHPO and the Advisory Council on Historic Preservation. The park staff would continue to develop inventories for the site's collections. These resources would be managed according to federal regulations and NPS guidelines.

Park management would restrict visitors in all instances where visitor use appears to adversely affect resources. This can be done by using protective carpet runners to direct the House tour and stanchions to protect non-public exhibit spaces. Park staff would work with certified archivists, as necessary, to assess and survey the archives, manu-

scripts, and administrative records owned by the park.

Park management would apply mitigation techniques to minimize the impacts on park resources during construction projects and other in-park activities. Plans to move interior walls to expand a corridor, or construction of museum collection storage space, would require an impact assessment of the site's character-defining features in accordance with The Secretary's standards, as both the House and ERC are listed on the National Register. If, in consultation with the Ohio State Historic Preservation Officer (SHPO), it is determined that a construction project would have an adverse impact, mitigation measures will be considered. Such measures might range from modifying a design proposal to full documentation of historic fabric conditions prior to any undertaking.

Park managers would regularly update the site's resource management plan and prioritize actions needed to protect and manage the resources. All areas used by visitors and staff would be monitored for signs of deterioration.

Intensity

Intensity refers to the degree or severity of an impact. Impacts are described as adverse or beneficial. Levels of intensity for each impact topic were determined using the definitions presented in the following sections.

Cultural Resources

In this EIS, the impact methodology applies to two basic types of cultural resources — historic property and museum collections. Impacts are described in terms of type, context, duration, and intensity, based on the regulations of the Council on Environmental Quality (CEQ) that implement NEPA. These impact analyses are intended to comply with the requirements of both NEPA and Section 106 of the National Historic Preservation Act (NHPA). In accordance with the Advisory Council on Historic Preservation (Advisory Council)'s regulations implementing Section 106 of the NHPA (36 CFR Part 800, *Protection of Historic Properties*), impacts to historic property are identified and evaluated by (1) determining the area of potential effects; (2) identifying cultural resources present in the area of potential effects that are either listed in or eligible to be listed in the National Register of Historic Places; (3) applying

the criteria of adverse effect to affected cultural resources either listed in or eligible to be listed in the National Register; and (4) considering ways to avoid, minimize or mitigate adverse effects.

An *adverse effect* occurs whenever an impact alters, directly or indirectly, any character-defining feature of a cultural resource that qualifies it for inclusion in the National Register, e.g., diminishing the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association. Adverse effects also include reasonably foreseeable effects caused by the actions proposed in the alternatives that would occur later in time, be farther in distance, or be cumulative (36 CFR Part 800.5, *Assessment of Adverse Effects*). A determination of *no adverse effect* means there is an effect, but the effect would not diminish in any way the character-defining features of the cultural resource that qualify it for inclusion in the National Register.

CEQ regulations and the NPS *Conservation Planning, Environmental Impact Analysis and Decision-making* (Director's Order #12) also call for a discussion of the appropriateness of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact, e.g., reducing the intensity of an impact from major to moderate or minor. Any resultant reduction in intensity of impact due to mitigation, however, is an estimate of the effectiveness of mitigation under NEPA only. It does not suggest that the level of effect as defined by Section 106 is similarly reduced. Although adverse effects under Section 106 may be mitigated, the effect remains adverse.

A Section 106 summary is included in the impact analysis sections for cultural resources under the alternatives. The Section 106 summary is not intended to meet the requirements of Section 106, but is based on currently available information. A formal finding of effect for the undertaking (implementation of the alternative) on cultural resources, based upon the criteria of effect found in the Advisory Council's regulations, will be made when the documentation requirements for a finding are available.

Impacts to cultural resources result from physical changes to material and non-material traits of a resource or its ancillary environment. There are two basic impacts: beneficial and adverse. Impacts typically occur from human intervention, but can

include such factors as improved accessibility, increased access to the resource, benign neglect, natural causes, and inappropriate resource use.

A variety of impacts have the potential to affect historic property and other types of cultural resources (museum objects, artwork, ethnographic collections, archeological artifacts, archives and manuscript collections, and photographs). Impacts are measured by the duration of effect on cultural resources: short, long, and permanent. Examples of short-term impact effects include using scaffolding or a safety fence during rehabilitation or mitigation work, and providing a temporary location during routine museum housekeeping and exhibit improvements. Short term impacts typically span a period from one to five years. Conversely, long-term impact is attributed to activities that change the resource(s), although the change may be reversible. A long-term impact involving an irreversible change permanently alters the historic structure, artifact, or associated records.

Any and all treatment of cultural resources is meant to ensure the long-term preservation of, public access to, and appreciation of, the historic property and the contributing values that support site significance. In this context, treatment is measured by the degree and duration of the impact upon resources.

Historic property

Intensity

Impacts are considered to be either adverse or beneficial to historic properties/cultural resources when analyzed under NEPA. However, impact type is not viewed this way when analyzed under Section 106 of the NHPA. For the purposes of assessing effects to historic properties under the NHPA, effects are either *adverse or not adverse*. Under both Acts, effects are considered adverse when they diminish the significant characteristics of an historic property.

Negligible: Impact(s) is at the lowest levels of detection – barely measurable with no perceptible consequences, either adverse or beneficial. For purposes of Section 106, the determination of effect would be no adverse effect.

Minor:	Adverse impact – impact would alter a non-character-defining feature of a structure or building, but would not diminish the overall integrity of the resource. For purposes of Section 106, the determination of effect would be <i>no adverse effect</i>.	dance with 36 CFR 800.6(b). Beneficial impact – restoration of a structure or building in accordance with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i>. For purposes of Section 106, the determination of effect would be <i>no adverse effect</i>.
	Beneficial impact – stabilization/preservation of features in accordance with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i>. For purposes of Section 106, the determination of effect would be <i>no adverse effect</i>.	<u>Duration</u> Duration refers to the time period during which the effects of an impact persist. The duration of impacts to historic property was determined using the following definitions: <i>Short term:</i> An effect that, within a short period of time, would no longer be detectable as the resource is returned to its pre-disturbance condition or appearance, generally fewer than five years. <i>Long term:</i> A change in a resource or its condition that does not return the resource to predisturbance condition or appearance, although the change may be reversible. <i>Permanent:</i> A change in a resource or its condition that does not return the resource to predisturbance condition or appearance and, for all practical purposes, is considered permanent.
Moderate:	Adverse impact – impact would alter a character-defining feature(s) of the structure or building, diminishing the overall integrity of the resource. For purposes of Section 106, the determination of effect would be <i>adverse effect</i>. A Memorandum of Agreement (MOA) is executed among the NPS and Ohio SHPO and, if necessary, the Advisory Council on Historic Preservation in accordance with 36 CFR 800.6(b). The mitigation measures identified in the MOA reduce the intensity of impact from major to moderate.	<u>Mitigation</u> Mitigation of adverse effects on historic character-defining features of historic properties starts with re-examination of the proposed project. Can the project be redesigned in a manner that will not impact character-defining features? This can often be the case when the character-defining features of a historic building were not identified prior to concept design development. Another alternative is to assess the feasibility of relocating the function that the project will provide. If the same function can be accomplished in another location, or if the potential shortcomings of relocating the function are minor compared to the adverse impact to the historic character of the structure, relocation of the project is a viable mitigation measure. If the project cannot be redesigned or relocated, and it is necessary to perform the core mission of the site, other mitigation measures must be explored. The historic resources that will be adversely impacted must be documented through
Major:	Adverse impact – impact would alter a feature(s) of the structure or building, diminishing the overall integrity of the resource. For purposes of Section 106, the determination of effect would be <i>adverse effect</i>. The NPS and applicable SHPO are unable to negotiate and execute a MOA in accor-	

measured drawings and large-format black-and-white photography. Drawings and photographs need to be stored in an environmentally stable manner. In addition, significant architectural features can be salvaged and should be catalogued and stored using proper curatorial methods.

No-Action Alternative

Analysis

In the site's enabling legislation, the NPS is directed to establish and maintain a partnership with the NFLL for day-to-day operations. The NPS would continue to own the Ida Saxton McKinley House, and would preserve the structure to maintain its integrity and character. This would be a minor long-term beneficial impact.

The NFLL currently owns and manages the City National Bank Building, which houses the ERC. During the time that the ERC property is not under NPS ownership, the NPS would continue to serve as a preservation advocate and would seek "to avoid or minimize any adverse effects" that may threaten the resources. The NFLL would not be precluded from seeking funds and technical assistance from other sources. A long-term minor beneficial impact would be anticipated.

Cumulative Impacts

Temporary or permanent alterations to the interior of the House or ERC to accommodate traveling exhibits or to provide additional storage for collections could, over time, cause degradation of the historic fabric. The preservation and ongoing maintenance of the House and the ERC would be consistent with the community's preservation ethic and augment the City's efforts to preserve and revitalize the area around the site. It is not likely that implementation of any of the Downtown Development Plan proposals would affect the historic structure.

Conclusion

Under the no-action alternative, there would be a minor long-term benefit to the NPS-owned House, because the NPS would preserve its integrity and character. The NPS would continue to assist in preserving the ERC to the extent possible. The NFLL would continue to take actions necessary to preserve and protect the ERC.

Section 106 Summary

In accordance with the Advisory Council on Historic Preservation's regulations (36 CFR 800) implementing Section 106 of the National Historic Preservation Act, the NPS finds that the no-action alternative would have *no adverse effect* on the House or ERC. The preservation of the House would be consistent with the Secretary of the Interior's Standards for Rehabilitation, *NPS Management Policies 2001*, and Director's Order-28 (Cultural Resource Management Guidelines). More detailed treatment plans would be developed in consultation with the Ohio Historic Preservation Office and the NFLL.

Alternative A: Preserving history of First Ladies through partnerships

Analysis

The NPS would own the House and insure the preservation of its integrity and historic character. This would be a minor long-term benefit. The House, an NPS-owned property, would receive priority assistance from the NPS. Under this alternative, a higher level of treatment than stabilization would be available to the ERC. The ERC would still be non-NPS owned, but the NPS would provide technical and operational support upon request and dependent on resource availability. Loss of the integrity of the ERC over time would be less likely to occur because of this increased support, which would be a long-term, minor beneficial impact.

Cumulative Impacts

The availability of NPS technical and operational assistance with the preservation of the NFLL-owned ERC would have a positive cumulative impact. Although the NFLL may use other preservation services, this option provides more resources. The City of Canton has a historic landmark ordinance with design review that greatly contributes to the preservation of the downtown area's historic character. The preservation and ongoing maintenance of the NPS-owned House and the non-NPS-owned ERC is consistent with the community's preservation ethic and augments the City's efforts in preservation and revitalization of the downtown area.

Conclusion

Alternative A would have a minor long-term beneficial impact on the NPS-owned House, and a minor long-term beneficial impact on the NFLL-owned ERC. There would be positive cumulative impacts as a result of the availability of NPS technical and operational assistance.

Section 106 Summary

In accordance with the Advisory Council on Historic Preservation's regulations (36 CFR 800) implementing Section 106 of the National Historic Preservation Act, the NPS finds that Alternative A would have *no adverse impact* on either the House or the ERC. The preservation of the House would be consistent with the Secretary of the Interior's Standards for Rehabilitation, *NPS Management Policies 2001*, and Director's Order-28 (Cultural Resource Management Guidelines). More detailed treatment plans would be developed in consultation with the Ohio Historic Preservation Office and the NFLL.

Alternative B: Wide variety of visitor experiences

Analysis

The ERC is listed in the National Register of Historic Places as the National Bank Building. Because the NPS would own the ERC as well as the House under this alternative, the preservation of the integrity and historic character of both structures would be ensured. As NPS-owned properties, both would receive priority assistance from the NPS. This would be a long-term moderate beneficial impact.

Cumulative Impacts

In Alternative B, the NPS would own both the House and the ERC. The ability of the NPS to retain the existing integrity of both structures would have a positive cumulative impact. The preservation and ongoing maintenance of the House and the ERC would be consistent with the community's preservation ethic and augment the City's efforts to preserve and revitalize the area around the site.

Conclusion

This alternative would have a long-term moderate beneficial impact on the House and ERC, as a result of the availability of NPS technical and operational assistance. Ownership of the Rotary Park would allow expanded interpretation of the exterior of the House and would provide a buffer between the House and the parking area.

Section 106 Summary

In accordance with the Advisory Council on Historic Preservation's regulations (36 CFR 800) implementing Section 106 of the National Historic Preservation Act, the NPS finds that Alternative B would have *no adverse effect* on the House, and would have *no adverse effect* on the ERC. The preservation of the House would be consistent with the Secretary of the Interior's Standards for Rehabilitation, *NPS Management Policies 2001*, and Director's Order-28 (Cultural Resource Management Guidelines). More detailed treatment plans would be developed in consultation with the Ohio Historic Preservation Office and the NFLL.

Alternative C: Research facility

Analysis

Under this alternative, the House and the ERC would have museum and research facility accreditation. The requirements for achieving and retaining museum accreditation would ensure a high degree of protection and preservation for the House. Because the House would accommodate only permanent exhibits, there would be less wear and tear on the interior than with temporary traveling exhibits. Most of the collection would be stored off site, further protecting the historic property by not trying to house more in storage than could comfortably be accommodated in the existing building envelope.

Cumulative Impacts

The combination of accreditation requirements and the availability of NPS technical and operational assistance with maintenance and preservation of the NPS-owned House and ERC would have a positive cumulative impact. The City of Canton's historic landmark ordinance with design review would greatly contribute to the preservation of the downtown area's historic character.

Conclusion

In this alternative, the requirements of retaining accreditation of the House and ERC would have a moderate-to-major beneficial impact on the historic structure. The Rotary Park would provide a buffer between the House and the parking area, affording further protection.

Section 106 Summary

In accordance with the Advisory Council on Historic Preservation's regulations (36 CFR 800) implementing Section 106 of the National Historic Preservation Act, the NPS finds that Alternative C would have no adverse effect on the House or the ERC. The preservation of the House would be consistent with the Secretary of the Interior's Standards for Rehabilitation, NPS Management Policies 2001, and Director's Order-28 (Cultural Resource Management Guidelines). More detailed treatment plans would be developed in consultation with the Ohio Historic Preservation Office and the NFLL.

Impairment of National Historic Site Resources or Values

None of the alternatives would result in impairment of the First Ladies National Historic Site's resources or values.

Museum and Library Collections

The Service collects, protects, preserves, and provides access to and use of objects, and archives and manuscript collections in original or digital formats in the disciplines of archeology, ethnography, history, biology, geology, and paleontology to engage park visitors and researchers, and to advance knowledge of the humanities and social sciences. The collections are typically divided into two broad categories: cultural and natural history collections.

Museum collections are valued resources that meet one or more of the following characteristics: 1) are generated by systematic research on Federal lands or through Federal funding or instrument, and are retained retained in perpetuity; 2) tend to appreciate in value; 3) are works of art; 4) are associated with a significant event, resource, or eminent figure; are commissioned works; are rare or one of a kind items.

Collections enable management to meet the core mission and objectives of NPS. Museum collections are important for their historic, scientific, artistic, and interpretive value. For the purposes of this plan, impact analysis for the museum collection focuses on acquisition, appropriate museum storage, and management (access and use of the collection.)

Treatment and management of individual objects in the collection are beyond the scope of this GMP. Duration of impacts to museum collections are considered either short or long term. Short-term impacts would involve reversible actions that last from one to five years. Reversible actions in museum collections resulting in short-term impact would include removing artifacts from exhibit cases to accommodate routine housekeeping or during an exhibit rehabilitation. Those objects would then be placed in museum storage at a temporary location. Long-term impacts include activities that relocate artifacts to a repository that does not meet NPS standards for security, fire protection, climate controls or access and use. Likewise, fragmenting the collection by curating portions of a collection among several repositories may adversely impact the resources and diminish effective management of the collection, and would be considered a long-term impact.

Objects and records are acquired and managed in accordance with an approved Scope of Collection Statement and current Collection Management Plan. Museum collections include objects, documents, books, electronic media, photographs, and other archival- related items. Objects and archives with direct association to the site (provenance) or an eminent figure will receive consideration over period pieces and reproductions. Any treatment or activity that impacts cultural resources and their context (environment) will proceed only after careful consideration of other alternatives by subject matter experts such as a senior museum curator, professional conservator, and certified archivist. The appearance and condition of cultural resources before treatment must be fully documented, and those records will become part of the object's history in the permanent record.

Intensity

Beneficial impacts occur when ongoing degradation of the collection is alleviated, or unsatisfactory conditions for managing the collection are remedied. These beneficial impacts can occur

when the collection, which would otherwise continue to be stored in places that place it at risk, is placed in storage or exhibit facilities that adequately control security, lighting, temperature, and humidity.

Adverse impacts can occur when the collection is subject to degradation as a result of inadequate security and environmental controls, or when management of the collection is hampered.

The following impact thresholds were used in this analysis.

Negligible: **Impact is at the lowest levels of detection** – barely measurable with no perceptible consequences, either adverse or beneficial, to museum collections.

Minor: **Adverse impact** – would affect the integrity of few items in the museum collection but would not degrade the usefulness of the collection for future research and interpretation.

Beneficial impact – would stabilize the current condition of the collection or its constituent components to minimize degradation.

Moderate: **Adverse impact** – would affect the integrity of many items in the museum collection and diminish the usefulness of the collection for future research and interpretation.

Beneficial impact – would improve the condition of the collection or its constituent parts from the threat of degradation.

Major: **Adverse impact** – would affect the integrity of most items in the museum collection and destroy the usefulness of the collection for future research and interpretation.

Beneficial impact – would secure the condition of the collection as a whole or its constituent components from the threat of further degradation.

Duration

Short-term adverse impacts would involve reversible actions that last from one to five years. Reversible actions in museum collections resulting in short-term impacts include removing artifacts from exhibit cases to accommodate routine house-keeping or exhibit rehabilitation and placing those objects in a temporary location.

Long-term adverse impacts include activities that relocate artifacts to a repository that does not meet NPS standards for security and environmental controls. Likewise, distributing portions of the collection among several repositories may adversely impact the resources and diminish effective management of the collection and would be considered a long-term adverse impact.

Mitigation

Mitigation measures related to museum collections consist of preventive conservation of a collection through proper storage, handling, and exhibit of museum objects. As necessary, more active mitigation to museum collections may require physical removal from the exhibit, storage location or from the site to a temporary off-site location. Occasionally, conservation treatment is performed to mitigate material loss to an object or to improve its overall physical condition.

No-Action Alternative

Analysis

Under this alternative, the museum collection and library would continue to be housed and maintained as they are currently, in the House and ERC, respectively. At times, when on-site space is unavailable, portions of the collection would be sent to a single temporary off-site repository. This temporary solution could be expensive in terms of funds and staff time. More importantly, the situation could make it difficult for the site to comply with the protection and preservation guidelines provided in the *NPS Museum Handbooks and Cultural Resource Management Guideline*, Director's Order #28. Additionally, maintenance of portions of the collection at an off-site facility could result in logistical and staffing problems that would impede effective management.

The National Park Service would maintain museum collections under its management in accordance with agency policy, insofar as is practicable. The NPS would also preserve the House to maintain the building's integrity and character. Consequently, impacts on the museum would be negligible. This would be a minor, long-term beneficial impact.

NPS artifacts and current collections at First Ladies National Historic Site would be cataloged according to NPS standards and curated to ensure long-term preservation and protection.

Cumulative Impacts

The ERC recently has installed shelving and cabinets for museum collection storage and ventilated curatorial work space facilities to house and preserve such objects, archives, and manuscripts. It has not yet been determined whether this equipment currently meets NPS minimum standards for collections management. Unless the minimum standards have been met, there would be potential for long-term minor-to-moderate adverse impacts to museum collections as a result of non-museum-quality storage cabinets and/or archival shelving, lack of properly ventilated curatorial workspace, and insufficient security measures, such as locking fire-proof cabinets and intrusion alarm systems.

Conclusion

The museum collection and library materials would be managed and protected to the extent allowable under current funding and staffing levels. Unless or until minimum standards for museum collections management are met, the museum property would face potential long-term, minor-to-moderate adverse impacts because of factors related to inadequate storage, a lack of curatorial work space, and inadequate security measures. Over the long term, these conditions could contribute to further deterioration and potential impairment of these resources. Storing collections at off-site repositories could result in logistical and staffing problems that would impede effective management.

Alternative A: Preserving history of First Ladies through partnerships

Analysis

Under this alternative, partnerships would be formed to share resources, museum, archives, and manuscript collections, and exhibits. The NPS would have a more active role in managing the site, and would provide technical assistance. A Scope of Collections Statement would be prepared by the NPS as a primary guiding document for the site in the acquisition of museum objects and other collections that contribute directly to the mission of the park, as well as those additional objects that the Service is legally mandated to preserve. The museum collection and library would continue to be housed and maintained in the House and ERC, respectively. When on-site space is inadequate to house the entire collection, a portion of the collection would be stored off site in an approved storage facility where the NPS is able to manage the collection consistent with policy guidance and museum standards for curation facilities as prescribed by the NPS *Museum Handbook and Cultural Resource Management Guideline*, Director's Order #28. Additionally, maintenance of portions of the collection at an off-site facility would result in logistical and staffing problems that could impede effective management.

The NPS would maintain the museum collections under its management in accordance with policy guidance. In some circumstances, however, the NPS would not have direct control over its collections partners. Because the NPS would not necessarily have day-to-day visits to the off-site curation facility, it would not be able to ensure full compliance with NPS standards of care in storage or on exhibit. These factors could result in a long-term moderate adverse impact related to the physical integrity of collections curated off site and for collections that are used in incoming and outgoing exhibits.

The NPS and NFLL would preserve the House to maintain the building's integrity and character. Maintenance contracts would be based on a Scope of Work, prepared by the NPS, designed to ensure that maintenance activities affecting the House did not result in any loss of historic fabric. Consequently, impacts on the House would be negligible. This would be a moderate long-term beneficial impact.

The NPS would provide technical assistance to ensure compliance with museum curation standards for permanent collections that would include managing the library stacks. This would be a long-term, minor-to-moderate beneficial impact.

Cumulative Impacts

Over time, the lack of direct NPS control over management and care of traveling exhibits and of off-site storage could result in deterioration and eventual impairment of the site's collections. There are no foreseeable cumulative impacts to the House museum or the library as a result of actions proposed in the Stark County Land Use Plan, Canton Downtown Development Plan, or other potential planned actions presently known to the NPS.

Conclusion

The museum collection and library would be managed and protected in accordance with policy guidance. In circumstances where the NPS did not have direct control over the care of collections, such as traveling collections or collections in off-site storage, the materials would face potential long-term, minor-to-moderate adverse impacts because of inadequate storage, curatorial work space, and protection measures. Over the long term, this could accelerate deterioration processes and cause irreversible damage or even loss to cultural resources. Maintenance of portions of the collection at off-site facilities would result in logistical and staffing problems that could impede effective management. Overall, there would be a long-term moderate beneficial impact.

Alternative B: Wide variety of visitor experiences (Preferred Alternative)

Analysis

In Alternative B, the NPS would have a greater role in collections management at the site. A Scope of Collections Statement would be prepared by the NPS to serve as a guide for all acquisitions. Additional planning documents would be prepared and implemented to ensure the long-term preservation and protection of museum collections such as housekeeping, integrated pest management, collection management plan, collection storage plan, environmental monitoring plan, preventive conservation plan, and access and use

plans. The NPS would adhere to stewardship reporting requirements for managing museum property and maintaining accountability. The collection would be fully cataloged using the Servicewide Automated National Catalog System (ANCS+).

The museum collections would be maintained and stored in the House and ERC to the standards set forth by the Secretary of the Interior. The collections management processes set in motion with the above list of curatorial plans and inspections would provide baseline information relating to conditions and preventive care, also known as preventive conservation, that avoids, blocks, or minimizes deterioration. Additional dedicated museum collection storage and a curatorial work space would be created, if necessary, in order to keep the collections on site. The creation of these collections spaces will impact the House, depending upon the extent of construction that is needed to adapt an existing space for storage and work space. Some examples are: blocking a window with a sheet of plywood to reduce potential for unauthorized intrusion, or installing a fire-rated door to meet museum standards. The storage facilities would comply with the protection and preservation guidelines and standards for storage facilities as prescribed by the NPS's *Museum Handbook and Cultural Resource Management Guideline*, Director's Order #28. Basic museum housekeeping practices, environmental monitoring, routine integrated pest management, and annual inventories would be initiated. There would be a long-term, major beneficial impact as a result of the consolidated on-site storage that met NPS standards.

As with all electronic collections available to the public, there would be potential for degradation and data corruption. To help prevent or limit such problems, the electronic library or bibliography collection would undergo routine information technology (IT) maintenance and data migration and, to the extent possible, would be secured against data corruption or manipulation using available IT expertise. Together these efforts would result in long-term minor beneficial impacts.

Cumulative Impacts

Shared involvement in the care of traveling exhibits and collection storage would ensure the continued long-term protection and preservation of the site's collections. There are no foreseeable

cumulative impacts to the museum or library collections as a result of actions proposed in the Stark County Land Use Plan, Canton Downtown Development Plan, or other potential planned actions presently known to the NPS.

Conclusion

The museum collections would be maintained and curated in the House and ERC according to the Secretary's standards. The off-site museum collection repository would meet all protection and preservation guidelines and museum standards. There would be a long-term, major beneficial impact as a result of the consolidated on-site storage meeting NPS standards. To help prevent data corruption of the virtual library, the electronic bibliography (metadata) would undergo routine IT maintenance and data migration, and would be secured against data corruption or manipulation. These efforts would result in long-term minor beneficial impacts.

Alternative C: Research facility

Analysis

Under this alternative, the collection would focus on research, emphasizing primary source materials. For the most part, the hard copy collections would be stored off site, but would be accessible electronically in the virtual library. The managerial responsibility, shared by the NPS and NFLL, would be to maintain and preserve the off-site collections to NPS standards. The off-site facilities would comply with the protection and preservation guidelines and standards for storage facilities as prescribed by the NPS's *Museum Handbook and Cultural Resource Management Guideline*, Director's Order #28.

In alternative C, the prescribed focus on primary sources would be inherently limited due to the scope of collection acquisitions accepting only materials with a direct association to the significance of the site. Because there would be no traveling exhibits, there would be substantially reduced physical damage to the historic fabric of the House. Additionally, museum accreditation would support a preservation directive to protect the House, and, therefore, through standardized routine museum maintenance, would ensure retention of its museum accreditation. The NPS would maintain museum collections under its management in accordance with agency policy,

insofar as is practicable. The NPS would also preserve the House to maintain the building's integrity and character. Consequently, impacts on the museum would be negligible. This would be a major, long-term beneficial impact.

Cumulative Impacts

There are no foreseeable cumulative impacts to the museum collection or library as a result of actions proposed in the *Stark County Land Use Plan*, *Canton Downtown Development Plan*, or other potential planned actions presently known to the NPS.

Conclusion

Accreditation for both the museum and the library would have the potential for long-term beneficial and adverse impacts — beneficial because of the high standards of care, adverse because of the need for off-site storage of all but the electronic library. Additionally, the lack of temporary traveling exhibits at the House would result in reduced wear and tear on the historic fabric of the House, which would have a long-term major beneficial impact.

The museum collections would be stored offsite. The storage facilities would comply with the protection and preservation guidelines and standards for storage facilities.

Visitor Experience

Methodology

The discussions of the visitor experience in this document cover the effects on visitors' ability to experience the site's primary resources, overall visitor access to the site, and access to appropriate orientation and interpretive information.

Visitor experience of the site's primary resources includes choices people have on how they will tour the site, what activities are available, how they will learn about the resources preserved at the park, visitor amenities, contact with park staff, and the days and hours the site is open for visitors.

Overall visitor access to the site includes knowledge that the site is available for visitors, parking, availability of information by phone, printed material and internet, handicapped accessibility, and the days and hours the site is open for visitors.

Access to appropriate orientation and interpretive information includes availability of a variety of interpretive exhibits, written materials, programming, orientation information, staff and volunteers, experiential learning, self-learning and staff-led learning.

Intensity

The intensity of impacts on visitor experience was determined using the following definitions:

- Negligible:** Visitors would not be affected or there would be no noticeable change in visitor experience.
- Minor:** Changes in visitor experience would be detectable, although the changes would be slight. The changes would affect a relatively small number of visitors, a localized area, or have barely perceptible consequences to the majority of visitors.
- Moderate:** Changes in visitor experience would be readily apparent and would affect a relatively large number of visitors.
- Major:** Changes in visitor experience would be severely adverse or exceptionally beneficial, highly noticeable, and would affect relatively large numbers of visitors.

Type

Impacts also are evaluated in terms of whether they are beneficial or adverse to visitor experience.

Beneficial impacts are those that would be perceived as positive by visitors or would contribute to the achievement of NPS goals for visitor experience.

Adverse impacts would be perceived as negative by visitors or would impair the achievement of visitor experience.

Duration

The duration of an impact on visitor experience is described as short term when the impact is temporary and occurs for less than one year, or long term

when the impact occurs for more than one year. The period of one year is chosen because the effects of most actions (*e.g.*, changes to visitor facilities or to programs) would stabilize after a year.

No-Action Alternative

Analysis

Facility limitations and the reservations policy would continue to lead to visitor frustration over the inability to get important orientation and interpretation. Outdoor interpretation of the House would continue to be non-existent. As visitation continues to increase, visitor services would not meet the needs and expectations of visitors to a national park site. The result would be a long-term minor-to-moderate adverse impact.

The primary audience would continue to be the general public. Researchers, educational groups, and expanded family groups would have limited access to resources. The result would be a long-term negligible adverse impact.

The programmatic focus of this alternative would continue to be the public and private lives of the First Ladies, and the lives of the McKinleys during the period that they lived in the House. Not much emphasis would be placed on the resource management educational opportunities, or on the singular achievements of the First Ladies. The result would be a long-term minor adverse impact.

Cumulative Impacts

Because there would be no new impacts associated with this alternative, it would not contribute to impacts of other actions. Consequently, there would be no cumulative impacts under the no-action alternative.

Conclusion

A moderately increasing number of visitors would continue to receive basic interpretation of the private and public lives of the First Ladies, and the era of the McKinleys. Drop-in visitors would be accommodated only if there were docents available. Parking would become more of a problem. The result would be a long-term minor adverse impact.

Alternative A: Preserving history of First Ladies through partnerships

Analysis

In alternative A, visitation would increase with regional population growth, and because of special events and marketing efforts by partners. The NPS and NFLL partnership would continue, with the NPS providing technical expertise and policy guidance, and the NFLL retaining responsibility for day-to-day on-site activities. In addition, the First Ladies National Historic Site would partner with other organizations, businesses, universities, and other entities to share resources, collections, and programs. The site, in cooperation with partners, would offer public education through lectures and seminars. The effect of these partnerships would be a long-term, moderate beneficial impact.

The site still would have visitor parking spaces available, but, in this alternative, off-site parking also would be provided by local businesses through partnerships. Providing additional parking spaces would be a long-term moderate beneficial impact. In Alternative A, because the primary audience is the general public, researchers and educational groups would have limited access to on-site resources, and educational programs would be of a general nature. The results would be a long-term moderate beneficial impact to the general visitor, negligible-to-minor adverse to the visitor with more scholarly interests.

In this alternative, the stories of the First Ladies provide the overall programmatic focus. Emphasis is on the First Ladies, rather than on the McKinleys. Visitors are encouraged to learn about the First Ladies through the use of exhibits and displays that are mostly temporary, traveling exhibits, produced through partnerships with others. The interior of the House serves as a backdrop for the exhibits. Public education programs are predominantly lectures and seminars. This alternative does not provide a wide variety of programming and learning styles for the public. There is not much emphasis on resource management and collections interpretation. The ERC is sparingly used for visitor programming. The result is a long-term minor beneficial impact.

Cumulative Impacts

With an emphasis on partnerships providing temporary and traveling exhibits, the cumulative visi-

tor knowledge has the potential to be broader for repeat visitors. For one-time visitors, the breadth of knowledge may be limited, because their visit may occur when only one theme of First Ladies is being heavily interpreted. The overall result would be long-term minor beneficial impacts.

Conclusion

Alternative A would provide a variety of traveling exhibits. Additional visitor parking spaces would be made available through partnerships with local businesses. Overall, this alternative would provide moderate-to-major long-term beneficial impacts on visitor experience.

Alternative B: Wide variety of visitor experiences

Analysis

In alternative B, visitation would be expected to increase as the regional population grows, and because this alternative is designed to appeal to the broadest spectrum of visitors. In addition to the general public, the site would design programs and exhibits, providing a variety of learning opportunities for school groups and researchers.

The NPS and NFLL may share the responsibility for day-to-day on-site activities. Both may work together on training and development of staff and volunteers, and on planning, preparing, and implementing exhibits, information, orientation, and education/interpretation programs. NPS professional staff may conduct some interpretive programs in this alternative. The number and effectiveness of interpretive and educational programs would be enhanced as a result of an increase in NPS interpretive staff. The sharing of the responsibilities for training and program development by NPS and NFLL would result in a long-term, major beneficial impact on visitor experience.

Programmatic focus in this alternative emphasizes encouraging self-discovery and self-directed learning through experiential activities on site. The interpretive story would be presented for diverse audiences in ways that engage attention and emotion, provoke thought and reflection, and relate to contemporary issues. A new visitor contact area in the ERC would be the primary focal point for information and orientation, and for interpretation.

Alternative B would employ a strong outreach program to provide information about the site to a broad spectrum of potential visitors, from the casual drop-by visitor to history buffs and school groups. The site would offer experiential activities on site and guided tours, as well as encourage self discovery and self-directed learning opportunities. These characteristics of Alternative B provide for a long-term major beneficial impact for visitors.

To ensure that collections remain on the site and under the control of the site managers, it might be necessary to build additional storage space in the House or the ERC. During the construction of the space, visitors might experience some noise or visual intrusion, but the effects would be short term and minor, because of the small scale of the construction and because the construction would not take place in prime visitor areas.

Cumulative Impacts

There are no foreseeable cumulative impacts on visitor experience that would occur as a result of implementing Alternative B.

Conclusion

In Alternative B, the number, variety, and effectiveness of interpretive programs is expected to increase commensurate with the increase in interpretive staff. There would be both traveling and permanent exhibits on display. Additional visitor parking spaces would be made available through partnerships with local businesses. The advantages of museum accreditation and research facility accreditation would enhance the visitor experience at the site. Overall, this alternative would provide long-term major beneficial impacts on visitor experience.

Alternative C: Research facility

Analysis

In alternative C, general public visitation would be expected to decrease, as the marketing emphasis shifted to focus mainly on researchers and other virtual visitors. The target visitor in this alternative would be researchers and educational groups, rather than the general public. Much of the visitation would occur through the internet, although the on-site library collection would be available to qualified researchers. The lower level and first

floor would be used for visitor services and scheduled programs. The House museum collection would be entirely permanent exhibits. General visitors would have limited options for activities and access to a broad understanding of the site's resources. Repeat visitors would have little new information available to them. This would result in a long-term minor-to-moderate adverse impact on the public.

The NPS and NFLL would share the responsibility for site management and day-to-day on-site activities. The NFLL would be responsible for volunteer training and development, and would manage the museum and library volunteers, with NPS assistance in research management. The NPS would provide technical expertise, policy guidance, and on-staff research professionals to assist researchers. The accreditation of the House as a museum and the ERC as a research facility would result in a long-term, major beneficial impact for researchers, but the overall experience for walk-in and general public visitors (as opposed to virtual visitors) would be long-term minor adverse impact, because collections would be primarily off-site, and access to the resources would be limited. There would, however, be a concerted effort made to share the progress and results of research projects with the public through public forums. This would be an advantage to the visitors living relatively close to the site, and would result in long-term minor beneficial impacts.

Cumulative Impacts

Overall, the impact of implementing Alternative C, with its emphasis on research, would have long-term, minor adverse cumulative impact on visitor experience as it relates to casual, drop-in visitors, but would have a long-term major beneficial cumulative impact on the experience of visitors doing scholarly research.

Conclusion

Alternative C would offer limited collections access to on-site visitors, and there would be limited options for activities and interpretation at the ERC. Researchers and virtual visitors, on the other hand, would find current, comprehensive bibliographic data. Overall, this alternative would provide long-term minor beneficial impacts on visitor experience.

Table 3: Summary of Environmental Impacts

	No-Action	Alternative A	Alternative B	Alternative C
Historic Property	Long-term minor beneficial impact on the House and ERC, because preservation work and adaptive use would maintain the structure's integrity and character, and ensure the maintenance and preservation of the building.	Long-term minor beneficial impact on the House and ERC, because preservation work and adaptive use would maintain the structure's integrity and character, and ensure the maintenance and preservation of the building.	A long-term major beneficial impact because the NPS would be able to insure the preservation of the integrity and character of these historic structures in accordance with the Secretary of the Interior's Standards for Treatment of Historic Properties.	Long-term minor beneficial impact on the House, because preservation would maintain the structure's historic integrity and character, and adaptive use would ensure the maintenance and contribute to the long-term preservation of the building. The requirements for achieving and retaining accreditation of the House museum and ERC would have a moderate-to-major beneficial impact on both historic structures.
Museum and Library Collections	There is potential for long-term minor-to-moderate adverse impacts to museum collections due to non-museum quality storage cabinets and/or archival shelving, lack of a properly ventilated curatorial work space, and insufficient security measures, such as locking fire-proof cabinets and intrusion alarm systems.	Long-term moderate beneficial impacts because the collections would be managed consistent with NPS policy. There could be potential long-term minor-to-moderate adverse impacts due to a lack of museum-quality collection storage, a well-ventilated curatorial work space, and/or security protection.	Long-term major beneficial impacts would result from adherence to the Secretary of the Interior's Standards for Treatment of Historic Properties, NPS museum curation practices, and consolidated on-site storage. The electronic collection would undergo routine scheduled data management and be secured against data corruption, resulting in long-term minor beneficial impacts.	Long-term major beneficial impacts because of the requirements for achieving and retaining accreditation of the House museum and ERC

Table 3: Summary of Environmental Impacts continued

	No-Action	Alternative A	Alternative B	Alternative C
Visitor Experience	Because of facility limitations, increased visitation would lead to long-term minor-to-moderate adverse impacts on visitor experience.	Partnerships with other cultural institutions, universities, and businesses would provide expanded resources, exhibit options, and programs, resulting in long-term moderate beneficial impacts. Much of the collection would be inaccessible to visitors, which could have a minor adverse impact on researchers.	Accreditation of the House as a museum would have a long-term major beneficial impact.	Emphasis shifts to "virtual" visitors and researchers. The House museum collection consists entirely of permanent exhibits. Limited options for activities and interpretation at the ERC. Impacts on the on-site visitor would be long-term minor-to-moderate adverse. Overall, accreditation of the House as a museum and the ERC as a research facility would result in long-term major beneficial impact for researchers, other interested "virtual" visitors, and on-site visitors.

Chapter 5: Consultation and Coordination

Public Involvement

A Notice of Intent to prepare a general management plan and environmental impact statement was published on March 26, 2002, in the *Federal Register* (volume 67, number 58, p. 13800). The scoping process for this GMP began with a public scoping meeting in February 2002. Members of the public commented at the meeting, and written comments were received as well.

Consultation With State Historic Preservation Office

In accordance with Section IV of the 1995 programmatic agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, certain undertakings require only internal NPS review for Section 106 purposes. Other undertakings require standard Section 106 review in accordance with 36 CFR 800. In those instances, the NPS consults as necessary with the state historic preservation officer, the Advisory Council on Historic Preservation, and other interested parties.

Copies of the draft plan will be sent to the SHPO and the Advisory Council on Historic Preservation requesting Section 106 review and comment.

List Of Agencies And Organizations Receiving A Copy Of The Draft Plan

U.S. Senators and Representatives

Senator Michael DeWine
Senator George Voinovich
Representative Ralph Regula

State Officials

Governor Bob Taft
Governor's Regional Economic Development Representative
Ohio Congressional Delegation /State representative for the Canton area

Federal Agencies

US Environmental Protection Agency,
Ken Lammers,
6950 Americana Parkway,
Reynoldsburg, OH 43068-4132
National Park Service, Washington DC Office
National Park Service, Midwest Regional Office

State Agencies

Ohio Historic Preservation Officer
Ohio Department of Education
Ohio Cultural Facilities Commission
Ohio Division of Travel and Tourism

City and County Governments

City of Canton Mayor
Canton City Council
Stark Area Regional Transit Authority (SARTA)

Organizations and Businesses

Canton Chamber of Commerce
Canton Convention and Visitors Bureau
Canton Development Partnership
McKinley Museum and Memorial
National Parks Conservation Association
The Rutherford B. Hayes Presidential Center

Appendix A: Legislation

First Ladies National Historic Site Act of 2000
114 STAT. 951 PUBLIC LAW 106–291—OCT. 11, 2000

SEC. 145. (a) SHORT TITLE.—This section may be cited as the
“First Ladies National Historic Site Act of 2000”.

(b) FIRST LADIES NATIONAL HISTORIC SITE.—

(1) FINDINGS.—The Congress finds the following:

- (A) Throughout the history of the United States, First Ladies have had an important impact on our Nation’s history.
- (B) Little attention has been paid to the role of First Ladies and their impact on our Nation’s history.
- (C) Establishment of the First Ladies National Historic Site will provide unique opportunities for education and study into the impact of First Ladies on our history.

(2) PURPOSES.—The purposes of this section are the following:

- (A) To preserve and interpret the role and history of First Ladies for the benefit, inspiration, and education of the people of the United States.
- (B) To interpret the impact of First Ladies on the history of the United States.
- (C) To provide to school children and scholars access to information about the contributions of First Ladies through both a physical educational facility and an electronic virtual library.
- (D) To establish the First Ladies National Historic Site in Canton, Ohio, the home of First Lady Ida Saxton McKinley.
- (E) To create a public-private partnership between the National Park Service and the National First Ladies Library.

(3) ESTABLISHMENT OF FIRST LADIES NATIONAL HISTORIC SITE.—

- (A) ESTABLISHMENT.—There is established in Canton, Ohio, the First Ladies National Historic Site.
- (B) DESCRIPTION.—The historic site shall consist of—
 - (i) the land and improvements comprising the National Park Service property located at 331 Market Avenue South in Canton, Ohio, known as the Ida Saxton McKinley House; and
 - (ii) if acquired under subsection (b)(4), National Park Service property located at 205 Market Avenue South in Canton, Ohio, known as the City National Bank Building.

(4) ACQUISITION OF CITY NATIONAL BANK BUILDING.—The Secretary may acquire by donation, for inclusion in the historic site, the property located at 205 Market Avenue South in Canton, Ohio, known as the City National Bank Building.

(5) ADMINISTRATION OF THE HISTORIC SITE.—

- (A) IN GENERAL.—The Secretary shall administer the historic site in accordance with this section and the provisions of law generally applicable to units of the National Park System, including the Act entitled “An Act to establish a National Park Service, and for other purposes”, approved August 25, 1916 (16 U.S.C. 1 et seq.), and the Act of August 21, 1935 (49 Stat. 666, chapter 593; 16 U.S.C.461 et seq.).

(B) COOPERATIVE AGREEMENTS.—

- (i) To further the purposes of this section, the Secretary may enter into a cooperative agreement with the National First Ladies Library (a nonprofit corporation

- established under the laws of the District of Columbia) under which the National First Ladies Library may operate and maintain the site.
- (ii) To further the purposes of this section, the Secretary may enter into cooperative agreements with other public and private organizations.
- (C) ASSISTANCE.—The Secretary may provide to the National First Ladies Library—
 - (i) technical assistance for the preservation of historic structures of, the maintenance of the cultural landscape of, and local preservation planning for, the historic site; and
 - (ii) subject to the availability of appropriations, financial assistance for the operation and maintenance of the historic site.
- (D) ADMISSION FEES.—The Secretary may authorize the National First Ladies Library to—
 - (i) charge fees for admission to the historic site; and
 - (ii) retain and use for the historic site amounts paid as such fees.
- (E) MANAGEMENT OF PROPERTY.—The Secretary may authorize the National First Ladies Library—
 - (i) to manage any property within the historic site;
 - (ii) to lease to other public or private entities any property managed under subparagraph (i) by the National First Ladies Library; and
 - (iii) to retain and use for the historic site amounts received under such leases.
- (6) GENERAL MANAGEMENT PLAN.—
 - (A) IN GENERAL.—Not later than the last day of the third full fiscal year beginning after the date of enactment of this Act, the Secretary shall, in consultation with the officials described in paragraph (B), prepare a general management plan for the historic site.
 - (B) CONSULTATION.—In preparing the general management plan, the Secretary shall consult with an appropriate official of—
 - (i) the National First Ladies Library; and
 - (ii) appropriate political subdivisions of the State of Ohio that have jurisdiction over the area where the historic site is located.
 - (C) SUBMISSION OF PLAN TO CONGRESS.—Upon the completion of the general management plan, the Secretary shall submit a copy of the plan to the Committee on Energy and Natural Resources of the Senate and the Committee on Resources of the House of Representatives.
- (7) DEFINITIONS.—In this section:
 - A) HISTORIC SITE.—The term “historic site” means the First Ladies National Historic Site established by subsection (b)(3).
 - (B) SECRETARY.—The term “Secretary” means the Secretary of the Interior.

Appendix B: Laws and Policies

The Organic Act of 1916 (16 USC 1, et seq.)

The National Park Service Organic Act remains after some 86 years the core of park service authority and the definitive statement of the purposes of the parks and of the National Park Service's mission: "to promote and regulate the use of the federal areas known as national parks, monuments, and reservations...by such means and measures as conform to the[ir] fundamental purpose...to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations."

General Authorities Act of 1970 (16 USC 1)

This Act affirms that all national park areas are "united through their interrelated purposes and resources into one national park system, as cumulative expressions of a single national heritage."

The Redwood Act of 1978 (16 USC 1a-1)

Congress supplemented and clarified the provisions of the Organic Act through enactment of the General Authorities Act in 1970, and again through enactment of a 1978 amendment to that law (the "Redwood Amendment") contained in a bill expanding Redwood National Park. This Act states that the provisions of the Organic Act apply to all units of the National Park System. A key phrase is that activities "shall not be exercised in derogation of the values and purposes for which these areas have been established." It is applicable unless Congress has "directly and specifically provided" otherwise.

National Parks and Recreation Act of 1978 (PL 95-625)

Section 604(b) of this act requires that general management plans be prepared and revised in a timely manner for each unit in the national park system. The act further specifies that general management plans shall include measures for the preservation of the area's resources, indications of the types and intensities of development associated with public use of the unit, visitor carrying capacities for all areas of the unit, and indications of potential modifications of the unit's external boundaries, if needed.

National Environmental Policy Act of 1969 (Title 42 U.S. Code sections 4321 to 4370 [42 USC 4321-4370]).

This landmark environmental protection legislation requires that federal decision-makers seek a balance between use and preservation of natural and cultural resources. NEPA requires all federal agencies to prepare in-depth studies of the impacts of and alternatives to proposed "major federal actions"; to use the information contained in such studies when deciding whether to proceed with the actions; and to diligently attempt to involve the interested and affected public before any decision affecting the environment is made. Implementing regulations for the National Environmental Policy Act are contained in Parts 1500 to 1508 of Title 40 of the U.S. Code of Federal Regulations (40 CFR 1500-1508).

Council on Environmental Quality Regulations, as amended (40 CFR 1500-1508)

These regulations implement the National Environmental Policy Act and provide guidance to federal agencies in the preparation of environmental documents identified under the Act.

National Historic Preservation Act of 1966, as amended (Sec. 106 and Sec. 110, 16 USC 470; 36 CFR 800). The purpose of this Act is to protect and preserve districts, sites and structures, and architectural, archeological, and cultural resources. Section 106 requires consultation with the State Historic Preservation Office. Section 110 requires that the National Park Service identify and nominate all eligible resources under its jurisdiction to the National Register of Historic Places.

Archeological and Historic Preservation Act of 1974, as amended (16 USC 469-469c)

This Act requires survey, recovery, and preservation of significant scientific, prehistorical, historical, archeological or paleontological data when such data may be destroyed due to a federal project. The Act directs federal agencies to notify the Secretary of the Interior whenever they find that such a project may cause loss or damage.

Archeological Resources Protection Act of 1979 [16 USC 470aa (1988)]. This Act defines archeological resources as any material remains of past human life or activities that are of archeological

interest and at least 100 years old; requires federal permits for their excavation or removal, and sets penalties for violators; provides for preservation and custody of excavated materials, records, and data; provides for confidentiality of archeological site locations; and encourages cooperation with other parties to improve protection of archeological resources. The Act was amended in 1988 to require development of plans for surveying public lands for archeological resources, and systems for reporting incidents of suspected violations.

**Executive Order 11593, "Protection and Enhancement of the Cultural Environment,"
May 13, 1971**

This Executive Order directs Federal agencies to inventory cultural properties under their jurisdiction, to nominate to the National Register all federally owned properties that meet the criteria, to use due caution until the inventory and nomination processes are completed, and also to assure that Federal plans and programs contribute to

preservation and enhancement of non-Federal properties. Some of the provisions of the Executive Order were turned into Section 110 of the National Historic Preservation Act.

**Executive Order 13007, "Indian Sacred Sites,"
May 24, 1996**

This Executive Order instructs each executive branch agency with statutory or administrative responsibility for the management of federal lands to 1) accommodate to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, access to and ceremonial use of Indian sacred sites by Indian religious practitioners, 2) avoid adversely affecting the physical integrity of such sacred sites, and 3) where appropriate, maintain the confidentiality of such sites.

Preparers and Consultants

Document Preparers

Midwest Regional Office

Sharon Miles

Job Captain and Community Planner, Master's Degree in Urban and Regional Planning. Four years with the NPS as a planner.

Carolyn Wallingford

Cultural Resources Division Consultant, Museum Collections Program Manager, Master of Arts in Museum Studies with an emphasis in textile history and conservation. Thirteen years with the NPS as a museum curator, ten years as assistant museum curator with the Kansas State Historical Society.

First Ladies National Historic Site

Carol J. Spears

Site Manager, First Ladies National Historic Site and James A. Garfield National Historic Site, Master of Science degree in Zoology. NPS employee for 22 years, as a Park Ranger Interpreter, Chief of Interpretation, Public Information Officer, and Site Manager.

Cuyahoga Valley National Park

Jeffrey Winstel

Cultural Resource Management Specialist/Historian, Master's degree in Historic Preservation Planning. Fourteen years with the NPS as a Historian and Planner.

National First Ladies' Library

Patricia Krider

Executive Director, National First Ladies' Library, Master of Business Administration. Nine years with the National First Ladies' Library, as Executive Director, Director of Computer Services, and a volunteer.

Project Consultants

National Park Service

Cuyahoga Valley National Park

John Debo, Superintendent

Midwest Regional Office

Sandra J. Washington

Chief, Planning and Compliance

Nicholas Chevance

Regional Environmental Coordinator

Consultation Letters



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGIONS 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 10 2005

REPLY TO THE ATTENTION OF:
B-19J

Mr. Nick Chevance
Regional Environmental Coordinator
National Park Service
Midwest Region
601 Riverfront Drive
Omaha, NE 68102-4226

Re: Draft Environmental Impact Statement / Draft General Management Plan for the First Ladies National Historic Site, Canton, Ohio, CEQ#: 20050404

Dear Mr. Chevance:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) / Draft General Management Plan (GMP), issued by the National Park Service (NPS), for the project listed above.

Four alternatives are presented in the DEIS. There is a no-action alternative that represents management of the site continuing as it has been in the past. There are four action alternatives representing different ways to manage the site. Alternative A provides interpretation of the roles and significance of First Ladies through partnerships that share resources, collections, exhibits, and programs, with the general public as the primary audience. Alternative B would provide a wide variety of methods to interpret the significance of all First Ladies and would offer diverse experiences to a broad range of visitors, from the general public to educational groups and researchers. Alternative C would combine elements of traditional on-site visitation with an emphasis on scholarly research on the roles and impacts of the First Ladies and associated events. The target audience of Alternative C is researchers.

The NPS has chosen Alternative B as the preferred alternative. U.S. EPA rates the preferred alternative as **LO (Lack of Objection)**. There are no significant environmental impacts associated with any of the alternatives.

If you have any questions please contact Julie Guenther at (312) 886-3172.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake", is written over a horizontal line.

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Science, Ecosystems, and Communities

Enclosures: *Summary of Ratings Definition and Followup Action*

Cc: Ms. Carol J. Spears
First Ladies National Historic Site GMP
8095 Mentor Avenue
Mentor, OH 44060

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment



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Canton, OH 44702

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November 9, 2005

Carol Spears
First Ladies' National Historic Site
General Management Plan
8095 Mentor Avenue
Mentor OH 44060

Dear Ms. Spears:

Canton and Stark County have much to boast of as regards tourism and cultural attractions. Since its inception, thanks to the leadership and vision of Mary Regula and Sheila Fisher and the strong day-to-day guidance of Executive Director Pat Krider, the First Ladies' National Historic Site (FLNHS) has become one of the county's (and indeed the state's) crown jewels. The two venues entice visitors and scholars alike, and the Canton/Stark County Convention & Visitors' Bureau is honored to work with such a nationally known attraction.

As Executive Director of the Bureau, I have studied the general management plan presented by the FLNHS in conjunction with the National Park Service. I believe that Alternative B will best advance the mission and objectives of this wonderful resource. Please contact me with any questions you might have.

Sincerely yours,

John Kiste
Executive Director

Cc: Pat Krider



CANTON REGIONAL
CHAMBER OF COMMERCE

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November 4, 2005

Ms. Carol Spears
First Ladies National Historic Site GMP
8095 Mentor Avenue
Mentor, OH 44060

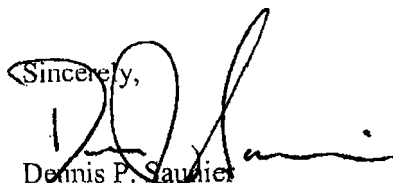
Dear Ms. Spears,

In ten short years, the First Ladies National Historic Site (FLNIIS) has gone from concept to a nationally recognized resource and treasure that will benefit, and be enjoyed by, people from around the world for years to come.

In Canton and Stark County, we are proud to have a cultural asset of this magnitude. The FLNHS not only provides a unique resource for scholars and academia to preserve and interpret the role and history of First Ladies, it also enriches the quality of life for our residents and enhances our region's ability to compete for much-sought-after cultural tourism dollars.

On Oct. 20, I attended the public meeting presented by the National Park Service (NPS). Since attending the meeting, I have had the opportunity to review the general management plan and environmental impact statement.

Credit for the Historic Site's success can be directly attributed to the vision of Mary Regula and Dr. Sheila Fisher. Under their continued leadership, direction and supervision along with Executive Director, Patricia Krider, the FLNHS will continue to prosper. Therefore, I recommend "Alternative B." This plan will best allow the current leadership to work in collaboration with the NPS.

Sincerely,

Dennis P. Saubier
President and CEO

Glossary

Accession

An accession is the acquisition of a single item or a group of items from one source; under one type of transaction (gift, purchase, exchange, field collection, and incoming loan) and on one date. Gifts, purchases, exchanges, and transfers are permanent and involve a transfer of ownership. This is the official first step to accept items into the National Park Service (NPS) museum collections.

Accessioning establishes legal custody and ownership and provides information on how the NPS acquired the items. (There are restrictions that prohibit NPS from accepting protected species, undocumented archeological collections, and objects of unknown origin, for example.)

Catalog

For the National Park Service (NPS) museum collections, cataloging is the process of recording detailed information about the individual objects or groups of related objects. Cataloging also includes assigning a unique identifying number. Catalog records provide access to information about the museum collection for research and interpretation.

Historic fabric

The physical elements that were combined or deposited to form a property from a historically significant period, as opposed to material used to maintain or restore a property following its historic period. (NPS-28)

Historic property

A district, site, structure, or landscape significant in American history, architecture, engineering, archeology, or culture.

Museum collection

A museum collection is an assemblage of objects collected according to some rational plan and maintained so they can be preserved, studied, or interpreted for public benefit. Museum objects include prehistoric and historic objects, artifacts, works of art, archival documents and natural history specimens. Elements, fragments, and components of structures are objects if they are no longer part of the original structure. Museum collections do not include items necessary to exhibit a collection, such as a case, diorama, special lighting, graphics, and so forth.

National Register of Historic Places

Frequently referred to as “The National Register”, this is the official federal list of districts, sites, buildings, structures, and objects deemed to be significant in American history, architecture, archeology, engineering, or culture.

Notice of Intent

A notice, published in the Federal Register, that an Environmental Impact Statement (EIS) will be prepared. The notice describes the proposed action and possible alternatives, describes the proposed scoping process, identifies where and when scoping meetings will be held, and contains the name and contact information for a person within the agency who can answer questions about the proposed action and the EIS.

Provenance

For museum collections, this term applies to the origin of the item, the maker or maker’s name, the period or time it was created and where the item was used and by whom. The National Park Service seeks to acquire only collections that have legal and ethical pedigree, which are part of an item’s provenance.

Record of Decision

This is a formal statement of the action an agency intends to take after having completed the Environmental Impact Statement process. The Record of Decision sets forth the rationale behind the decision and discusses the environmental consequences of the action.

Scoping

Scoping is a public process to identify significant environmental issues requiring in-depth analysis in the Environmental Impact Statement (EIS), along with alternative actions to be considered. Scoping is the first opportunity for public involvement in the preparation of an EIS.

State Historic Preservation Officer (SHPO)

The official designated by the governor to administer the state’s historic preservation program and the duties described in 36 CFR part 61, including nominating properties to the National Register.

Visitor

Any person who uses a park’s interpretive and educational services, regardless of where such use occurs (*e.g.*, via internet access, a library, etc.).