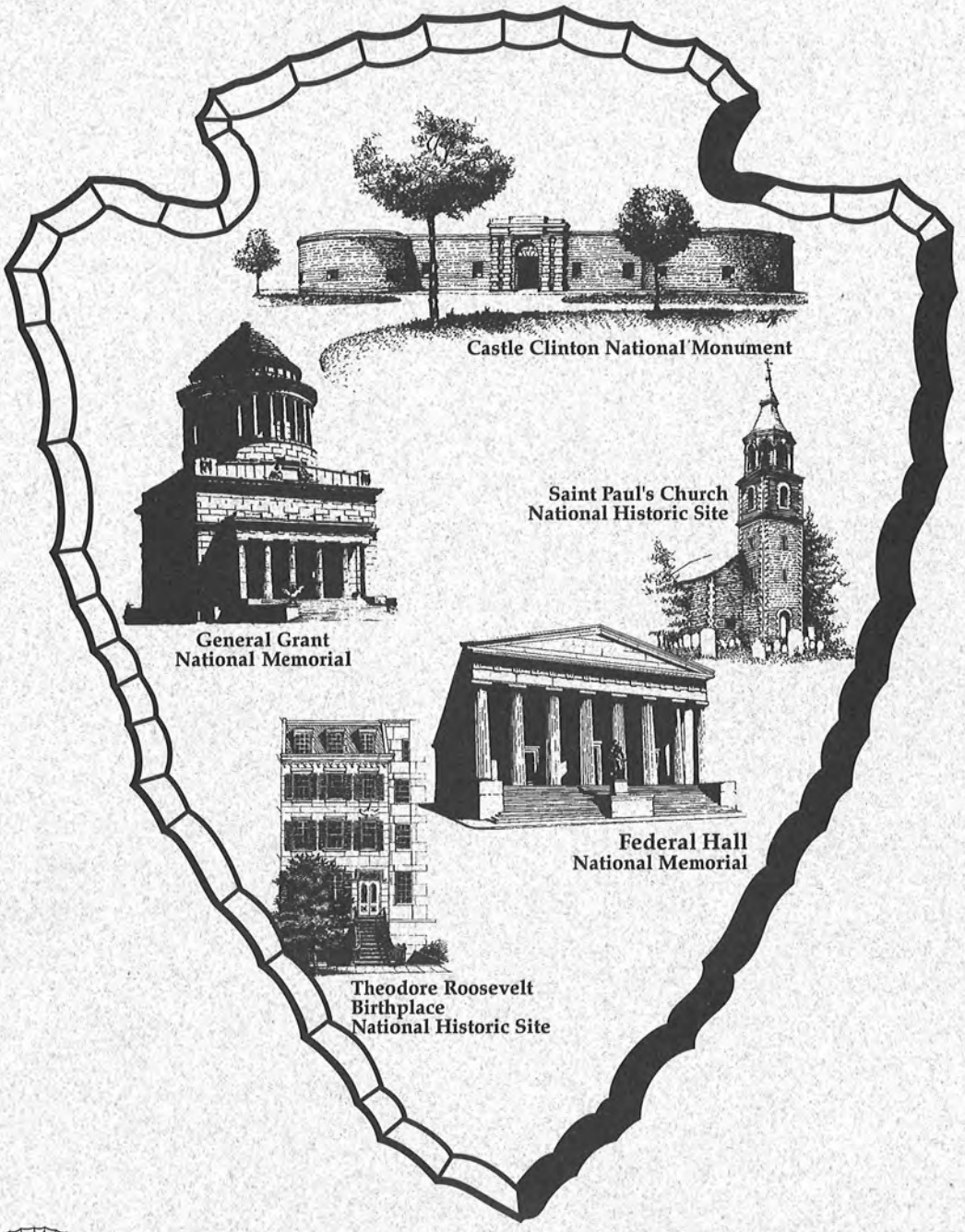
Final
General Management Plans
Environmental Impact Statements



NATIONAL PARK SERVICE
DEPARTMENT OF THE INTERIOR

Manhattan Sites

New York

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Final
General Management Plans
Environmental Impact Statements

MANHATTAN SITES

Castle Clinton National Monument, Federal Hall and General Grant National Memorials, and Saint Paul's Church and Theodore Roosevelt Birthplace National Historic Sites
New York and Westchester Counties, New York

Alternatives for future management and use of each of the sites listed above are presented and analyzed in this document. Under each site there is a "no-action" alternative that presents a continuation of existing trends and management, meets the minimum requirements, and provides a basis to evaluate the other alternatives.

At Castle Clinton National Monument the three alternatives range from continuing existing conditions (alternative 1), to providing a new structure for Statue of Liberty/Ellis Island ticketing sales outside of the fort (alternative 2), to constructing a roofed structure inside and over the old fort walls and providing an auditorium and seating for performances and more operational space (alternative 3). Alternative 2 would have the least impact on the structure; alternative 3 would have major impacts on the structure (but not the 1811 stone walls). At Federal Hall National Memorial the three alternatives range from continuing existing management (alternative 1), to preserving and restoring the structure and installing a visitor information center (alternative 2), to converting the use of Federal Hall exclusively to the public and for collection storage, with a state-of-the-art visitor information center and the relocation of offices to another facility (alternative 3). Alternative 2 would have positive impacts for site interpretation and positive and negative impacts on the physical structure. Alternative 3 would impact site management. At General Grant National Memorial the three alternatives range from providing for the rehabilitation, security, and maintenance of the structure and site (alternative 1), to restoring the structure and site to the original design intent of the architect and continuing interpretation through handbooks and occasional costumed interpreters (alternative 2), to preserving the tomb and site as they are and building a visitor center in the pavilion across Riverside Drive (alternative 3). Alternative 1 would continue to limit the visitor experience, alternative 2 would impact the structure and site and require acquisition of city property, and alternative 3 would have few structural impacts on the structure and site, allow for more interpretation than alternatives 1 and 2, and would require acquisition of city property. At Saint Paul's Church National Historic Site the two alternatives range from continuing the interpretive programs and existing site management through the cooperators (alternative 1), to changing park management to the National Park Service with assistance from the cooperating association and renting a facility for curatorial storage and preservation work (alternative 2), which would impact site management. Under alternative 1, without funding for a consistent preservation maintenance program, site resources would deteriorate. At Theodore Roosevelt Birthplace National Historic Site the three alternatives range from continuing interpretation and site and resource preservation and interpretation, (alternative 1), to installing a central air-conditioning system and a closet elevator from the third to fourth floor (alternative 2), to installing a central air-conditioning system and a modern elevator to all four floors (alternative 3). Under alternative 1 part of the collection would remain without adequate temperature and humidity control and the fourth floor would remain inaccessible to visitors with disabilities. Under alternative 2 some historic fabric would be damaged, but the collection would have environmental controls. Under alternative 3 there would be substantial impacts on the original design and fabric of the building, but the collection would have atmospheric controls.

For more information about this document, contact Superintendent Joseph T. Avery of Manhattan Sites, 26 Wall Street, New York, NY 10005 (212-825-6990).

United States Department of the Interior • National Park Service • Denver Service Center

SUMMARY

INTRODUCTION

Six national park system properties in New York comprise the administrative unit known as the Manhattan Sites. They are Castle Clinton National Monument; Federal Hall, General Grant, and Hamilton Grange National Memorials; and Saint Paul's Church and Theodore Roosevelt Birthplace National Historic Sites. Since the early 1970s these sites have been administered by one NPS superintendent and individual site managers.

Castle Clinton National Monument is a fort that was built on landfill as an island at the southern tip of Manhattan between 1808 and 1811 as part of a coastal defense system to protect the United States against renewed hostilities by Great Britain. Landfill was later added to the fort to connect it with historic Battery Park, which was used to defend New York City until the American Revolution. Castle Clinton National Memorial was authorized on August 12, 1946 (60 Stat.997).

Federal Hall National Memorial, on Wall Street, commemorates the site of the inauguration of George Washington as the nation's first president (1789), the site of the first capital of the United States, the meeting place of the first U.S. Congress, and the site of prerevolutionary activities. These activities included the Stamp Act Congress (1765) and trial of John Peter Zenger (1735), which contributed to the establishment of the principal of freedom of the press. The existing structure was also once used as a subtreasury. Federal Hall was designated as Federal Hall Memorial National Historic Site on May 26, 1939, and was approved and changed to Federal Hall National Memorial on August 11, 1955 (69 stat. 632).

Hamilton Grange National Memorial, in Harlem, was the home (1802-04) of Alexander Hamilton, first secretary of the U.S. Treasury, one of the authors of the *Federalist Papers*, architect of the treasury system of the federal government, and lieutenant colonel and aide to Gen. George Washington during the American Revolution. Hamilton Grange National Memorial was authorized on April 27, 1962 under Public Law 87-438 (76 Stat.57).

Saint Paul's Church National Historic Site, in Westchester County, New York, is an 18th century church that reflects some of the events that were important in the development of the nation. It served as a hospital during the American Revolution and has a churchyard containing the graves of 90 soldiers of the revolution. Saint Paul's Church National Historic Site was designated on July 5, 1943, and authorized in 1978 under Public Law 95-625 (title V, sec. 504).

Two presidential sites, Theodore Roosevelt's Birthplace National Historic Site (in the Gramercy Park area) and General Grant National Memorial (in Harlem), commemorate the contributions of these two great Americans to the growth of the nation. Theodore Roosevelt Birthplace National Historic Site was authorized on July 25, 1962, under Public Law 87-547 (76 stat. 217). General Grant National Memorial was dedicated in 1897. The legislature approved transfer of the property from the Grant Monument Association and the city of New York to federal ownership in 1956. The site was accepted by Congress on August 14, 1958, and placed under the management of the National Park Service on May 1, 1959, by Public Law 85-659 (72 stat. 614).

The purpose of this *General Management Plan/ Environmental Impact Statement* is to analyze and evaluate five of these sites: Castle Clinton, Federal Hall, General Grant, Saint Paul's Church, and Theodore Roosevelt Birthplace. Due to immediate restoration concerns at Hamilton Grange, the *Final General Management Plan and Environmental*

Impact Statement for Hamilton Grange (NPS 1995c) was completed separately.

The five separate plans in this document for each site will provide management guidance for issues and concerns related to the historic structures and their associated cultural and natural resources. Alternative concepts for future management and use of the sites are presented. These alternatives reflect a range of different strategies for meeting the purposes of the individual sites and examine the staff and funding that would be required to implement the actions of the alternatives presented.

As part of each site's *General Management Plan*, an environmental impact statement (in compliance with the National Environmental Policy Act) evaluates potential impacts of implementing the alternative actions. Subsequent development actions undertaken to implement the selected alternative concept would be preceded by site-specific compliance procedures that would tier on this document.

The following is a summary of the alternatives and major impacts for each site.

CASTLE CLINTON NATIONAL MONUMENT

Alternative 1

Alternative 1, a "no-action" alternative, describes a continuation of existing management, meets minimum requirements, and provides a basis to evaluate the other alternatives. Under this alternative NPS operation, management, and preservation maintenance would continue as it is. The fortification appearance and interpretation of the structure would continue, although exhibits would be upgraded. Ticket sales operations for the Statue of Liberty/Ellis Island would continue to be in the fort, but efforts would be made to improve ticket sales management. Ropes and stanchions would be added to help define the ticket lines. Restrooms would be upgraded, although the capacity would remain the same.

This alternative would result in minimal change to the site and no impacts on the walls of the 1811 fortification or national register qualities of the structure. The site would continue to function primarily as a ticketing facility, and the negative impacts on visitor experience and services, mostly because of the ticket sales crowds, would continue. The restrooms would continue to be overcrowded and in need of repair. There would be no additional impacts on the local community or the economy. Staffing would continue to be inadequate for the full operation of the site and crowd control for ticket sales. This alternative would have more impacts than alternative 2 because of the numbers of people in the structure but would have fewer impacts than alternative 3.

Alternative 2

Alternative 2 would preserve the structure and would relocate the ticket sales outside the structure — by moving the kiosks from the structure to a location outside the fort, using the existing ticket facility that is outside the fort, or building a new facility outside the fort. This would provide more visitor use and interpretive space inside the fort (without the crowds / ticket lines associated with ticket sales) and room for additional exhibits, which would allow enhanced interpretation and visitor experience. Restroom facilities would be upgraded, although the capacity would remain the same.

This alternative would not impact the original fortification walls, national register qualities of the structure, or the 1970s restoration of the fortification period. Constructing a new ticketing facility outside the fort could have a minimal impact on the site, depending on the location of the structure, which would be mitigated through design and careful site location. Depending on the location, the landscape could change slightly.

Limited city park land in Battery Park would be used if a new structure is built. Using the existing kiosks or the existing ticket facility outside the fort would have very little impact. The number of visitors to the site might be reduced (without the people wanting tickets to the statue and Ellis Island) but could also increase because visitors might want to see the site for the site itself and the improved/new exhibits and interpretation. Restroom facilities would continue to be overcrowded. The actions of this alternative would create the least amount of impact on the fort structure and would have positive impacts on the visitor experience.

Alternative 3 (Proposed Action)

This alternative, the National Park Service's preferred alternative, would involve the construction of a roofed structure inside the fort walls that would leave the 1811 walls in place and provide an auditorium and seating for performances and more exhibit and operational space. The new structure would be designed to accommodate uses consistent with the Castle Garden era (1823-55) and permit the development of the site's fullest use as a setting for interpretive and performance programming. Restroom facilities would be expanded, and ticket sales would be accommodated. If the ticketing function were relocated from the Castle Clinton structure, the options for location would be the same as in alternative 2. With enhanced interpretive media, interpretation would focus on the entire history of the site. More staff and funding for operations would be needed.

The actions of this alternative would have major impacts on the use and appearance of the structure — removing the 1970s reconstruction materials — but would not permanently impact the 1811 stone walls of the fort. There would be impacts on the New York City skyline from some viewpoints, but with careful design the impacts on the overall historical integrity of the structure and its surrounding area would not be adverse. (The existing fort is a reconstruction.) More visitors would probably be drawn to Battery Park and the new entertainment options and the social and cultural activities and interpretive exhibits.

Visitation to the site would probably be the highest under this alternative. The quality of the visitor experience and the extent of the overall impacts would be greater than in alternatives 1 or 2.

FEDERAL HALL NATIONAL MEMORIAL

Alternative 1

Under this no-action / minimum requirements alternative the management and use of the site would continue as it currently exists, housing park and cooperator offices as well as collections storage. The emphasis on interpretation and school programs would continue. Some exhibits would be upgraded and/or relocated. The physical structure would continue to be monitored for structural integrity. After a study of structural needs, the building would be preserved and restored. Actions would be taken to repair and rehabilitate the structural components that have deteriorated.

The actions of this alternative would have the least impact of the three alternatives on the historic fabric and the structure. Subway movement and building settling would continue to impact the structure. The visitor experience would be somewhat improved because of improved media.

Alternative 2 (Proposed Action)

With the installation of a visitor information center and the addition of exhibits and other interpretive media (such as film, interactive videos, graphics, artifacts, and tours), interpretation of the site would be the main focus of this alternative. The visitor center would provide interactive exhibits and information about nationwide national park

system sites. Alternative 2 would have positive impacts on the interpretation of the site and the visitor's understanding of its history, mainly through more effective use of interior space. After a study of structural needs, the building would be preserved and restored. Actions would be taken to repair and rehabilitate the structural components that have deteriorated. Subway movement and building settling would continue to impact the structure.

This alternative would introduce new elements that would impact the physical structure. Funding and staffing levels would need to be increased. This alternative would cause more impacts on the structure than alternative 1 but less than alternative 3.

Alternative 3

This alternative would convert Federal Hall exclusively to public use and would offer extensive interpretation. Visitors would have the opportunity to learn the full history of the site and the associated key events in the development of the nation. The NPS and cooperator staff offices would be relocated to a rented facility. A state-of-the-art NPS visitor information center would be created, with interactive exhibits portraying the history of Federal Hall, information on other national park system sites, and exhibits, videos, graphics, and other interpretive media would be added or improved. Storage for the curatorial collection would be expanded, and an auditorium/lecture space would be created in space on the third floor. After a study of structural needs, the building would be preserved and restored. Actions would be taken to repair and rehabilitate the structural components that have deteriorated.

This alternative would create the most impacts on site management, partly because of the relocation of offices. Visitor experience would be greatly enhanced. Subway movement and building settling would continue to impact the structure. Site staffing and funding would have to be increased. This alternative would have the greatest impact on the structure and site.

GENERAL GRANT NATIONAL MEMORIAL

Alternative 1

The no-action alternative would continue existing management trends and meet minimum requirements. Under this alternative the National Park Service would continue with the security, rehabilitation, and maintenance of the structure and site. Access to the main level for mobility impaired visitors would be provided, and exhibits would be updated. No public restrooms would be added, and the mosaic sculptured seating would be retained in place. Site security would continue with use of an overnight guard service. No additional staff would be needed, and operational funding would not be substantially increased.

This alternative would have positive effects on the historic fabric; the structural repair work would improve the overall condition of the structure, helping in its continued preservation and future maintenance. The visitor experience would continue to be somewhat limited. This alternative would have the least impact on the structure and the site.

Alternative 2

Under this alternative the tomb and Riverside Park area around the tomb would be restored to the original design intent of the architect, John H. Duncan. This would require the removal of architectural changes that have been made to the structure and site since their original construction, including the mosaic sculptured seating, and the removal of many landscape elements, such as the sycamore trees planted in the 1930s (if further study shows there would be no impacts on the endangered peregrine

falcon from removing these trees). Interpretation would be through occasional costumed interpreters and handbooks because the visitor contact desk and book sales area would be removed. Although the original design did not provide accessibility to physically impaired people, access to the main level would be provided for visitors who are mobility impaired. This alternative would require acquisition of city property.

The actions of this alternative would cause major impacts on the structure and site. Architectural elements, some of which are more than 50 years old, would be removed from the structure, and the landscaping and finished plaza area would also be removed (if allowed). The mosaic sculptured seating would be relocated to Claremont Park, just north of the tomb, and would undergo preservation treatment. This alternative would have the most impact on the structure and site.

Alternative 3 (Proposed Action)

Actions under this alternative would preserve the tomb and site and most of the changes that have been made since it was constructed. Moreover, a new visitor center would be built in the pavilion across Riverside Drive. (City property would have to be acquired for the plaza area, ellipse, visitor center (pavilion), and temporary tomb site.) This would allow for the solemnity of the interior of the tomb to remain; interpretation, which would be expanded, would be relocated to the visitor center. Tomb access for the mobility impaired would be to the main level only. Enhanced security would include a fence and lighting. Staffing would have to be increased.

Although the area has been previously disturbed, it is not known if any archeological resources would be impacted. An archeological survey would be completed before construction to determine if resources exist. Increases in visitor use could impact local traffic patterns, both temporarily and permanently, with the installation of a controlled traffic signal. The lack of parking for cars and buses could become a problem. However, the visitor experience at the tomb would be significantly improved.

The development of the tomb visitor center in combination with other actions such as the development of the Strivers Center Project and Harlem Pier and the restoration of Hamilton Grange (if promoted by the National Park Service and the city) could help stimulate tourism and bring associated economic benefits to the Harlem area. These development activities, in combination, have a greater chance of stimulating the local economy than each development opportunity separately. Additional costs for services such as police protection, graffiti removal, street cleaning, and promotional efforts would also be incurred.

This alternative would have fewer impacts on the structure and site than alternative 2 and would allow for more interpretive opportunities than alternatives 1 and 2.

SAINT PAUL'S CHURCH NATIONAL HISTORIC SITE

Alternative 1

The no-action alternative would continue the existing management of the site through the cooperator (the Society of the National Shrine of the Bill of Rights at Saint Paul's Church, Eastchester, Inc.). The site would meet minimum requirements and be maintained and preserved with available funding. School and interpretive programs would continue as they currently exist, although wayside exhibits would be added. An ethnographic overview and assessment would be done.

The actions in this alternative would not create major impacts on the site. However, without funding for a consistent preservation maintenance program, the resources could deteriorate. Also, a few onsite artifacts

would continue to be stored within the floodplain, although steps would be taken to lessen these impacts when an adequate structure could be found. This alternative would have a greater impact on the resources but less of an impact on the cooperative management of the site than the preferred alternative.

Alternative 2 (Proposed Action)

Implementing this alternative would result in a change of management for the site. The National Park Service would be responsible for the management of the site, and the cooperator would provide support staff and volunteers. An in-depth, onsite, historical research program would be established, an ethnographic overview and assessment would be done, and historical materials related to the site would be assembled and preserved. The curatorial artifacts would be assembled and preserved in a nearby rented or acquired facility, out of the floodplain; there would be adequate climate control and security, support for the weight of the gravestones, and room for conservation work. The carriage house would provide space for research, administrative, and maintenance facilities.

The entire site would be enclosed with a compatibly designed perimeter fence to provide site security and deter vandalism. The National Park Service would develop new exhibits and would continue tours that reflect the full range of the interpretive themes and provide an educational background for visitors. New exhibits would be developed, and school group and other tours would be continued, with NPS staff relating the site's history. This alternative would result in greater impact on the management of the site than alternative 1.

THEODORE ROOSEVELT BIRTHPLACE NATIONAL HISTORIC SITE

Alternative 1

This no-action / minimum requirements alternative would continue the preservation of the site and its resources, including its impressive curatorial collection. Interpretation would remain unchanged. Exhibits would have proper preservation treatment, and the adverse impacts of the climatic conditions on the collection would be reduced. Portable humidification equipment would help preserve the collection. Window air-conditioners (in the rear) would continue to be used to provide better temperatures for the collections and structure and would also increase visitor and staff comfort. A ramp would be installed at the front of the house to allow wheelchair users unassisted access to the ground level. However, the fourth-floor auditorium would remain inaccessible to visitors with physical disabilities. An ethnographic overview and assessment would be done.

This alternative would not impact any architectural or structural features (except the ramp). However, the curatorial collection would continue to be stored at less than ideal humidity and temperatures. There would be no new impacts on the quality or quantity of visitor use and experiences.

Alternative 2 (Proposed Action)

There would be an enhancement of the programs and facilities at the site with the rehabilitation of the basement level information / sales desk and restrooms. The installation of a central air-conditioning system under this alternative would provide comfort to visitors and staff, as well as protection to the collection. A museum-standard climate control system would be installed for the collection storage area. Furthermore, the site would be made accessible with the installation of the ramp described in alternative 1 and a closet

elevator from the third to the fourth floor. The exhibits would remain as they are, and additional exhibits and publications would be developed. The library on the third floor would be restored in part to its 1923 appearance using original furnishings, and a resource and educational center of site-related archival materials would be developed in the library. An ethnographic overview and assessment would be done.

The quality of the visitor experience would be improved under this alternative. This alternative would impact some historic fabric with the installation of the air-conditioning system and the closet elevator. Impacts would be reduced by careful design and installation. The collection would have proper climate controls, which would delay deterioration.

Alternative 3

A modernized elevator through the entire structure up to the fourth floor auditorium would be installed under this alternative (requiring an addition to the rear of the building for the elevator shaft), making it accessible to all visitors. The installation of the elevator would require major alterations of two period rooms. A central air-conditioning system, with a museum-standard climate control system in the collection storage area, would also be installed. Additional exhibits and publications would be developed. The second-floor library would be restored in part to its 1923 appearance using original furnishings, and a resource and educational center of site-related archival materials would be developed. An ethnographic overview and assessment would be done.

The quality of the visitor experience would be greatly improved. This alternative would have a substantial impact on the historic design and fabric of the building. Several elements of the original design would be removed to allow space for the elevator and renovate the library, install the air-conditioning systems, and add interior space. This alternative would have more adverse impacts on the site than the other alternatives. However, there would be beneficial impacts on the museum collections and its storage space and exhibits.

CHANGES FROM THE DRAFT PLAN

Based on the comments received during the public comment period, a few changes were made in this final plan. At Castle Clinton, the idea of using automated ticket sales was rejected and removed because further study was needed to evaluate associated impacts (especially regarding the Circle Line / Statue of Liberty Ferry Inc.) At Grant's tomb, the addition of a presidental flag would occur in all alternatives instead of just in alternative 1.

All comment letters and responses to substantive comments have been included in the "Consultation and Coordination" section of this document.

THE FINAL PLAN

This document is the *Final General Management Plan / Environmental Impact Statement* for Manhattan Sites. After a 30-day review period, comments will be analyzed, an alternative will be selected, and a record of decision will be issued.

Comments on or questions about this *Final General Management Plan / Environmental Impact Statement* should be directed to

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INTRODUCTION

Six national park system properties in New York make up the NPS administrative unit known as the Manhattan Sites. They are Castle Clinton National Monument; Federal Hall, General Grant, and Hamilton Grange National Memorials; and Saint Paul's Church and Theodore Roosevelt Birthplace National Historic Sites (see Manhattan Sites and Region map). Together, these six sites represent over 300 years of this country's history. Since the early 1970s these sites have been administered by one NPS superintendent with site managers (see appendix A).

Five of the six sites are in the borough of Manhattan in New York City, a highly urbanized metropolis. Manhattan is an island bordered by the East River on the east, the Hudson River on the west, the upper New York Bay to the south, and the Harlem River and the Bronx to the north. Castle Clinton National Monument is on the southernmost tip of Manhattan, in Battery Park. Federal Hall, the first capitol of the United States, is less than 0.5 mile north in the Wall Street district. Further north, on East 20th Street, is the reconstructed birthplace and boyhood home of Theodore Roosevelt. General Grant is memorialized in a tomb in Riverside Park in upper Manhattan on a bluff overlooking the Hudson River. Approximately 1 mile northeast from General Grant's tomb is Hamilton Grange National Memorial, the only home that Alexander Hamilton owned.

Saint Paul's Church National Historic Site, the only site outside Manhattan, is in the city of Mt. Vernon in Westchester County north of Manhattan. The events in New York City that led to the establishment, growth, and development of our national government constitute the theme of the Manhattan Sites.

Castle Clinton National Monument is a fort built between 1808 and 1811 as part of a coastal defense system to protect the United States against renewed hostilities by Great Britain. It adjoins the historic Battery which defended New York City from its founding until the American Revolution.

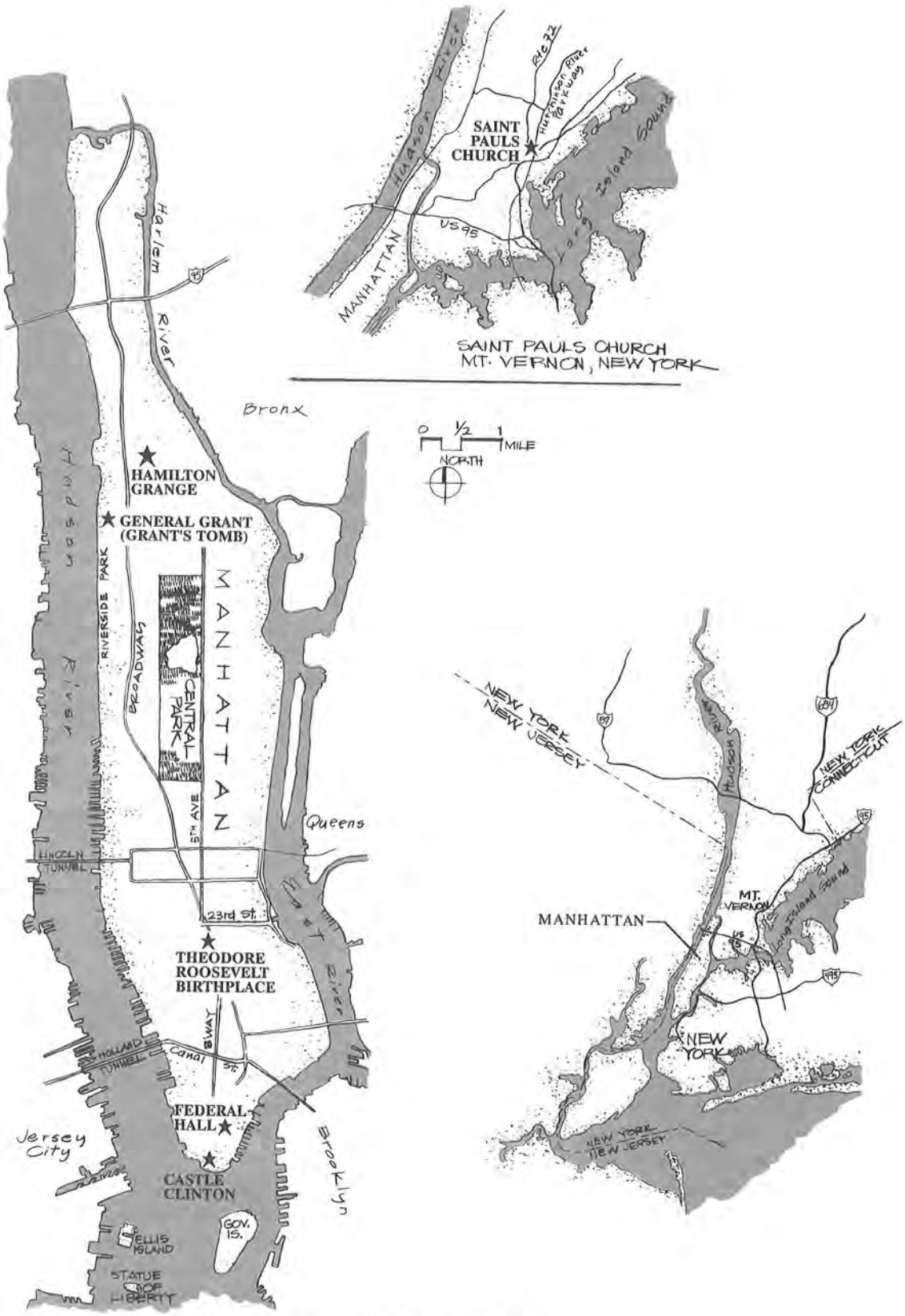
New York City was the capital of the nation for nearly six years, from 1785 to 1790. The Confederation Congress met at Federal Hall from 1785 through 1788. The first Congress of the United States met at this location from March 1789 until August 1790. Federal Hall National Memorial also commemorates the site of the inauguration of George Washington as our first president (1789), the site of pre-revolutionary activities including the Stamp Act Congress (1765), and the trial of John Peter Zenger (1735), which contributed to the establishment of the principal of freedom of the press.

Hamilton Grange National Memorial was the home (1802–04) of Alexander Hamilton — first secretary of the U.S. Treasury, author of the *Federalist Papers*, architect of the federal system of government, lieutenant colonel and aide to General Washington during the American Revolution.

Saint Paul's Church National Historic Site is an 18th century church that served as a hospital during the American Revolution. The churchyard contains the graves of soldiers of the revolution and almost every other war that involved the United States.

Two 19th century presidential sites, Theodore Roosevelt's Birthplace National Historic Site and General Grant National Memorial, which commemorate the contributions of these two great Americans to the growth of the nation, complete the park.

Because all six sites are unified by their contributions to the development of the country and common interpretive themes, this document proposes the introduction of legislation to Congress to change the name of the Manhattan Sites to Manhattan / New York Sites National Historical Park. This new



Manhattan Sites and Region

United States Department of the Interior / National Park Service
DSC / Oct. 1992 / 416 / 20020

name is suggested as a more appropriate name than Manhattan Sites because it identifies the historical unity shared by these six sites. It is immediately apparent that these are historical resources, not natural, scenic, recreational, or other.

The common theme linking these sites is that they commemorate individuals or events that have contributed to the development of the ideals and operations of American government.

As the nation's first capitol, Federal Hall was the focal point of the struggle to create the democratic republic that had been made possible by the American Revolution and foreseen in the United States Constitution.

Hamilton Grange was the home of Alexander Hamilton, one of the leaders in the creation of a strong national government and architect of a sound federal fiscal policy.

Saint Paul's Church served a community defining its own need for self-government during the 17th and early 18th centuries, then becoming part of the battle ground for American independence.

Castle Clinton was built to defend the nation's hard-won independence and later became an emigrant reception center to provide assistance to new Americans.

Grant's tomb honors the man who helped to preserve the Union during its hour of greatest trial and later, as president, sought to ensure the right of all people of color to participate in the democratic process.

Theodore Roosevelt's birthplace commemorates the man who led America onto the world's stage as one of the great powers while also championing the preservation of America's historic and scenic resources.

The network of nationally significant sites sprinkled throughout the greater New York City area finds its focus in linked historical events and interpretive themes. These themes would carry visitors through history — from the earliest days of the European landing in New York through the developing colonial period, the Revolutionary War, and subsequent founding and growth of the young nation. Tying together a core network of NPS interpretive literature, tours, and site presentations would offer visitors a comprehensive picture of our national continuum from a perspective unlike any other in the country.

PURPOSE OF AND NEED FOR THE PLAN

Although managed as one administrative unit, each of the sites was established by Congress at different times between 1939 and 1978.

- Castle Clinton National Monument was authorized on August 12, 1946.
- Federal Hall National Memorial was designated as Federal Hall Memorial National Historic Site on May 26, 1939 and was approved and changed to Federal Hall National Memorial on August 11, 1955.
- General Grant National Memorial was dedicated in 1897. The legislature approved transfer of the property from Grant Monument Association and the city of New York to federal ownership in 1956. The site was accepted by Congress on August 14, 1958, and placed under the National Park Service on May 1, 1959.
- Hamilton Grange National Memorial was authorized on April 27, 1962.
- Saint Paul's Church National Historic Site was designated on July 5, 1943, and authorized in 1978.
- Theodore Roosevelt Birthplace National Historic Site was authorized on July 25, 1962.

The purpose of the *General Management Plan* for these sites is to guide the overall management, development, resource conservation, and use of each site. The plans

present alternatives for the preservation and development of each site and analyze the impacts of implementing each alternative. The preparation of these documents complies with NPS policy and PL 95-42, which require the preparation of a general management plan for every park unit of the national park system. These plans are usually revised every 10 to 15 years.

Hamilton Grange National Memorial was originally included in this *General Management Plan*. However, structural problems that posed an imminent threat to visitors and the resource required that planning for Hamilton Grange proceed ahead of the other five sites. The *Final General Management Plan/Environmental Impact Statement* for Hamilton Grange was released to the public in March 1995 (NPS 1995).

LEGISLATIVE DIRECTION

The legislative directions for each of the individual sites (see appendix B) provide no specific directions for the management of the sites. In addition to each site's legislative purposes, NPS *Management Policies* (chap 8:1) direct that "To the extent practicable, the National Park Service will encourage people to come to the parks, and to peruse inspirational, educational, and recreational activities related to the resources found in these special environments" and that "the use of the parks will be essentially resource based but nonconsumptive of resources. Consumptive uses of park resources, whether renewable or nonrenewable, will be allowed only where specifically authorized." Consumptive uses include those that are destructive or wasteful of the sites' resources. These policies guide recommendations for visitor experience and public use in all of the alternatives presented in this document.

The *General Management Plan* and subsequent management will follow the direction of other applicable federal, state, and city statutes and regulations. Federal laws guiding administration of all units within the national park system include the following:

National Park Service Organic Act of 1916, which established the National Park Service and mandates that it "shall promote and regulate the use of federal areas known as national parks, monuments, and reservations . . . by such means and measures as conform to the fundamental purpose of said parks, monuments, and reservations, which purpose is 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 manner and by such means as will leave them unimpaired for the enjoyment of future generations."

An amendment to general NPS authorities, the **Redwood National Park Act**, directs that within the national park system,

> authorization of activities shall be construed and the protection, management, administration . . . shall be conducted in light of the high public value and integrity of the national park system and shall not be exercised in derogation of the values and purposes for which these areas have been established.

National Environmental Policy Act (NEPA), which declares that it is the policy of the federal government to "preserve important historic, cultural, and natural aspects of our national heritage." Title I of this act requires that federal agencies plan and carry out their activities "so as to protect and enhance the quality of the environment." Major federal actions, such as this *General Management Plan* for the Manhattan Sites, require environmental impact statements.

National Historic Preservation Act, which requires federal agencies that have direct or indirect jurisdiction over undertakings to consider the effect of those undertakings on national register properties and allow

the Advisory Council on Historic Preservation an opportunity to comment.

Other federal laws may apply and must be considered. Furthermore, the state and city of New York have many statutes that dictate the management of cultural and natural resources.

MANAGEMENT ISSUES TO BE ADDRESSED IN THE PLAN

A number of issues and concerns have been identified that impede the realization of the purpose, significance, and management objectives for the Manhattan Sites as a whole and for each individual site. These issues are based, in part, on obstacles that have arisen in managing the sites and have been supplemented by public comment at the open house meetings during which the preliminary alternatives for site development were presented (see "Consultation and Coordination" section). Concerns that pertain to all the sites are discussed below. Additional site-specific issues are addressed in the individual plans for each of the five sites.

Staffing

Manhattan Sites has a history of rapid turnover of career employees, which is primarily attributable to noncompetitive federal government salaries, the high cost of living, and the difficulty of finding satisfactory, affordable housing. The difficulty in attracting and retaining qualified career personnel adversely affects all facets of site management and visitor services.

Maintenance Organization

Most equipment and materials for custodial services are stored at the individual sites. The building maintenance and repair staff is centrally located at Federal Hall in lower Manhattan. The geographic separation between the sites and the resulting travel times are inefficient and may result in inefficient maintenance practices. Additional staff and adequate maintenance space at each site are required.

Facilities for Storage of Collections

Museum collection storage facilities and space at all sites are currently being evaluated by regional office staff. Space allocation for collection storage should be enhanced at all sites. Although improvements have recently been implemented for storage areas, improved environmental controls are needed. Furthermore, a facilities management plan is needed for the park sites.

Security and Fire Suppression Systems

The security systems at Federal Hall and Theodore Roosevelt Birthplace were upgraded in 1991. These sites are protected by an extensive monitored alarm system. The remaining sites also have alarm systems but are more prone to vandalism due to their locations. The adequacy of these systems should be evaluated.

Visitor Experience

Interpretation at the sites is limited, and interpretive opportunities are not fully implemented because of inadequate staffing and facilities. Informational/directional signs at most of the sites and on local streets and highways are insufficient. Some of the sites are not fully accessible to visitors with disabilities.

Local Issues

Because the Manhattan Sites are in a large urban area, park management must address many situations that are inherent in urban settings. Castle Clinton, Federal Hall, and General Grant are, at times, impacted by the

presence of the homeless, who mostly use the sites for shelter overnight and during inclement weather. Management strategies must be developed and implemented that would more effectively address these issues.

RELATIONSHIP OF THIS PLANNING EFFORT TO CITY, STATE, AND PRIVATE PLANNING EFFORTS

Planning efforts by city and state agencies continually occur within New York City. Some of these current planning projects within the areas of Castle Clinton and Federal Hall may directly or indirectly involve these sites. Discussed below are some current planning efforts conducted by the New York City Department of Parks and Recreation.

Pier A

Near Castle Clinton, the New York City Department of Parks and Recreation has developed plans to renovate Pier A in conjunction with the state and other local and federal agencies. The renovation will include a visitor center, restrooms, and shops for visitors and residents. The visitor center will present information on a conceptual park known as Harbor Park, which will include as many as 15 or 20 different federal (including national park system sites), state, local, and private parks or developments along New York Harbor.

NPS representatives have been involved in an advisory capacity in planning for the pier. The renovation plans could help alleviate current problems with distribution of information regarding the Manhattan Sites and the lack of adequate restroom facilities at Castle Clinton and in Battery Park.

Heritage Trails New York

Heritage Trails New York is currently a composite of four walking tours in lower Manhattan that lead visitors to the monuments of downtown Manhattan's rich architectural and cultural heritage. Heritage Trails distributes information and trail guides at Federal Hall, along with a video overview of the trails. Beginning at Federal Hall, visitors can go south to Battery Park and Castle Clinton, east from Wall Street to the South Street Seaport, north to Broadway, City Hall, and the Brooklyn Bridge, or west to Trinity Church and the World Trade Center. The purposes of the trails are to help increase public awareness of Wall Street and its surrounding environment and highlight the historical events and places related to the development of our nation. These heritage trails are being sponsored by major institutions, organizations, governments, and private individuals in downtown Manhattan.

Battery Park Conservancy

The Battery Park Conservancy has plans to upgrade Battery Park and its facilities. A visitor center is proposed through the development of Pier A, along with additional restrooms. An effort is being made to preserve the elements of the landscape and upgrade the security, maintenance, and custodial activities throughout the park.

The conservancy is a nonprofit, educational corporation founded to educate others about the historical importance and significance of Battery Park and New York City, as well as to improve the general conditions and quality of visitor experience in the park. The immediate goals of the group are to revitalize the park and to expand the functions of Castle Clinton as a cultural center for lower Manhattan. Towards this end, the Conservancy has been working with numerous federal, state, and local agencies, such as the National Park Service, as well as other public and private groups to gain support and coordinate proposed development plans (Pier A proposed redevelopment, for example).

STRUCTURE OF THIS DOCUMENT

The *General Management Plan / Environmental Impact Statement* for each of the five Manhattan Sites is presented separately in the following pages. Each plan includes site-specific information on purpose and significance, issues and concerns, interpretive themes, and proposed alternatives for development and use, a description of site-specific cultural, natural, social, and economic resources, when applicable, and an evaluation of the potential impact of each alternative on these resources. Cumulative impacts are also discussed by site.

Several sections contain information that pertains to all five of the Manhattan Sites. Descriptions of cultural resources and natural resources, including climate and air quality, and introductory information on the socioeconomic environment, visitor use, and transportation are presented in the "Overall Affected Environment" section. This data should be used to supplement the resource data provided in each individual plan / impact statement. Also, the "Overall Management Actions" section describes management actions that would be taken under any alternative in any of the following five plans. The sections on consultation and coordination, compliance with federal, state, and local laws, supporting appendixes, and references — which apply to all sites — are provided at the end of the document.

OVERALL AFFECTED ENVIRONMENT

The following resource information is a general synopsis of resource information available for the collective Manhattan Sites. Site-specific resource information is presented for each individual unit under its management plan discussion.

CULTURAL RESOURCES

The six sites that comprise Manhattan Sites — Castle Clinton National Monument, Federal Hall, General Grant, and Hamilton Grange National Memorials, and Saint Paul's Church and Theodore Roosevelt Birthplace National Historic Sites are all listed on the National Register of Historic Places. Only one of the sites, Hamilton Grange, is a national historic landmark. All of these sites represent different, yet interwoven periods of history that led to the growth of our nation. The cultural resources of each of these sites (except Hamilton Grange) are discussed in depth under each individual management plan in this document. (The associated resources at Hamilton Grange are described in a separate *General Management Plan* [NPS 1995c] due to immediate structural and preservation concerns.)

NATURAL RESOURCES

Climate

The New York City metropolitan area is in the path of most storm and frontal systems that move from west to east across the North American continent. Because most storms come from the west, the city has higher temperatures in summer and lower temperatures in winter than would normally be expected in a coastal area.

Although continental influences are dominant, oceanic effects are also present, with local sea breezes occasionally moderating the afternoon heat in summer and adding to the warming effect of the heat generated by the city in the winter. The small average daily variation in temperature attests to the influences of the ocean.

Average yearly temperature varies from a low of 46.9° F to 62.2° F. High and low average temperatures occur in July (85° F) and January (26° F), respectively. Average relative humidity varies yearly between 75% and 80% in the early morning hours throughout most of the summer and early fall. Precipitation averages 44 inches annually.

Vegetation

All of the sites are within the urban setting of New York City and its suburbs. Within this context the vegetative resources of the Manhattan Sites are indicative of a landscaped and manicured setting. The greatest assemblage of vegetation species is found at Saint Paul's Church, with its 6 acres of open space. Conversely, Federal Hall contains the least amount of vegetation of any of these sites due to its built environment. The vegetation management at General Grant Memorial is under the jurisdiction of the city. Vegetation associations are typical of landscaped sites containing grassy areas interspersed with various trees such as ash, elm, locust, mulberry, Norway maple, red maple, and wild cherry. Numerous invasive and landscaped nonnative plant species such as crabgrass and the tree of heaven can be found at most of these sites.

Wildlife

Similar to the vegetation species, wildlife populations at the Manhattan Sites reflect the urban environment. Most of these species use the park environments for their habitat needs. Many of these individuals depend on human interactions, either as a food source

(feeding of animals or availability at trash receptacles) or for the shelter opportunities provided by the historic structures. Wildlife species that are common throughout these parklands include numerous bird species such as pigeons, starlings, English sparrows, and sea gulls. The small mammal population includes species such as the Eastern gray squirrel *(Genera citellus)*, house mouse *(Mus musculus)*, and the Norway rat *(Rattus norvegicus)*. Other wildlife considerations include an abundant insect population including ants, spiders, beetles, cockroaches, and silverfish. Numerous nonnative species of wildlife (including insects and small mammals) can be found at each of the sites.

Threatened and Endangered Species

There are no known federal or state listed or proposed endangered or threatened species under U.S. Fish and Wildlife jurisdiction at either Saint Paul's Church or Theodore Roosevelt Birthplace National Historic Sites, except for occasional transients. None of the park habitats are considered critical for these species by that agency.

Consultation with the U.S. Fish and Wildlife Service field office in New York and the Significant Habitat Unit of the New York Department of Environmental Conservation revealed documented sightings of the peregrine falcon *(Falco peregrinus)*, a federal and state listed endangered species, within the vicinity of Castle Clinton National Monument and Federal Hall and General Grant National Memorials.

Water Resources and Wetlands

All of these park sites are in heavily urbanized areas that contain no water resources or wetlands within the park boundary or their immediate vicinity.

Floodplains

Only two sites, Castle Clinton and Saint Paul's Church, are within the floodplain as determined by the Federal Emergency Management Agency. The other sites, Federal Hall, General Grant National Memorial, and Theodore Roosevelt Birthplace, are outside of the area predicted for the 100- and 500-year flooding extent. General Grant National Memorial and Theodore Roosevelt Birthplace are outside of the floodplain.

Soils

The units comprising the Manhattan Sites are in a highly urbanized area and, as such, have not been surveyed by the U.S. Soil Conservation Service. Considering the magnitude of development throughout Manhattan Island, it is expected that the soils at each site are suitable for the purposes of sustaining proper landscaping materials and for development.

Air Quality

All six Manhattan sites are classified as class II clean air areas under the Clean Air Act (42 USC 7401). Under this classification, maximum allowable increases (increments) in sulfur dioxide (SO_2), particulate matter, and nitrogen oxides (NO_x) should not be exceeded.

The Manhattan Sites are within the New Jersey-New York-Connecticut Interstate Air Quality Control Region. Data from the New York Division of Environmental Conservation, Division of Air Resources, was collected from within this region for 26 and 35 air monitoring stations in the borough of Manhattan and Westchester County, respectively. These data indicate that emissions in Manhattan and Westchester County are within the national ambient air quality standards for SO_2, nitrogen dioxide ($N0_2$), lead, and particulate matter. However, emissions of carbon monoxide (CO) and

ozone levels (O_3) exceeded or did not meet the national standards. The Manhattan Sites are in an area of nonattainment with the national ambient air quality standards for carbon monoxide and ozone. Section 176 of the Clean Air Act requires any action on the part of a federal agency in a nonattainment area to conform to the state's efforts to attain and maintain these standards, which is applicable in this plan for the two pollutants documented. Because none of the NPS sites include parking facilities, and none of the alternatives for any of the sites propose new parking, then actions proposed would be in conformance with the Clean Air Act.

Poor air quality conditions related to vehicular pollutants, acid rain, and emissions from neighboring industries have affected cultural resources within the region when combined with certain environmental conditions. Acid rain affects the weathering process of marble and limestone. Its presence in the atmosphere greatly accelerates the deterioration of materials used in gravestones such as those at Saint Paul's Church. In addition, poor air quality conditions have damaged culturally significant historic structures as a result of corrosion to the exterior stone matrix.

SOCIOECONOMIC ENVIRONMENT

Five of the six Manhattan Sites are in New York City in the borough of Manhattan. Saint Paul's Church is in Mt. Vernon in Westchester County, very close to the northern border of New York City, and shares many of the characteristics of the greater New York area.

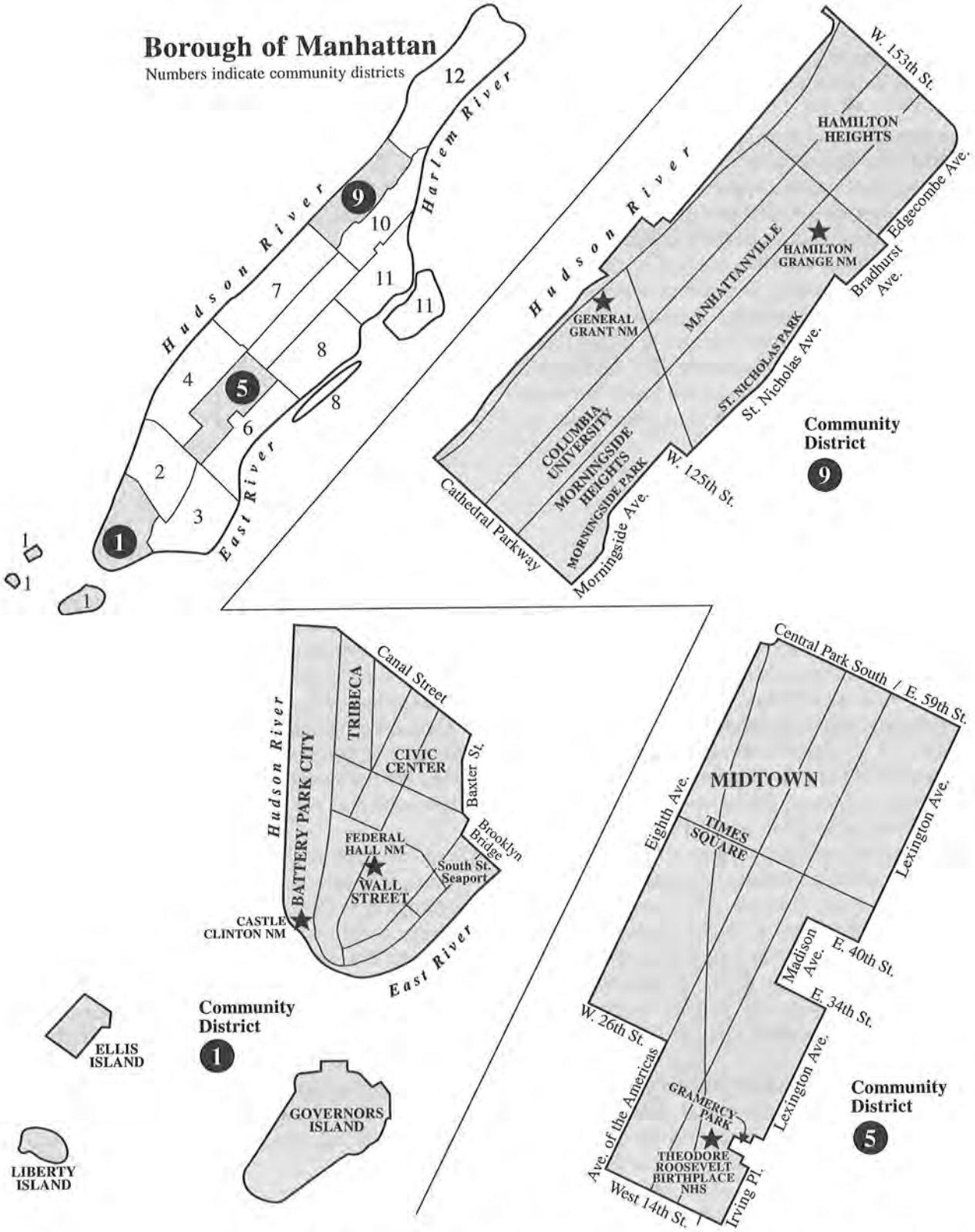
New York City, one of the most densely populated places in the United States, occupies 321.8 square miles and supports a population of 7.32 million (1994 census estimate). The city is divided into five boroughs known as the Bronx, Brooklyn, Queens, Staten Island, and Manhattan. Manhattan encompasses approximately 23.7 square miles and has a population of 1.49 million or 20% of the city's population. This borough is divided into 12 community districts that are administered by community boards. The intent of these boards is to represent the needs of their community and serve in an advisory capacity to the New York City council and mayor. As listed below, the five sites in Manhattan are in three of the 12 community districts (see Community Districts / Neighborhoods map).

District 1: Castle Clinton and Federal Hall
District 5: Theodore Roosevelt Birthplace
District 9: General Grant (and Hamilton Grange)

Because of the neighborhood characteristics and availability of data by district, socioeconomic information that relates to NPS site management is presented in each individual plan by district. This information was abstracted from the *Community District Needs Report* for fiscal year 1995 and from socioeconomic profiles compiled by the New York City of Department of City Planning from the 1990 census. Socioeconomic information pertaining to Mt. Vernon and Saint Paul's Church were abstracted from local planning data and the 1990 census.

In summary, socioeconomic characteristics between the three districts and Westchester County vary. District 1, in lower Manhattan, has the lowest population of the four areas, but has the highest median household and per capita incomes ($47,445 and $37,228, respectively) because of its location. This district contains Wall Street, the World Trade Center, and many banks, insurance companies, brokerage and investment houses, and commercial business firms, which support a working population of approximately 0.5 million. Although income is high, rents and other living expenses are equally high.

District 5, in midtown Manhattan, represents the central business district of New York City. Household and per capita incomes are similar to that of district 1. The district supports a low residential population (about 45,000) in comparison to its working population of 2 million.



Community Districts/Neighborhoods

Manhattan Sites

United States Department of the Interior / National Park Service
DSC / Dec. 1995 / 962 / 20,000

District 9, commonly known as West Harlem, supports a high residential population but is economically depressed because of a lack of sustainable commercial enterprises, industries, and new economic development opportunities. Median household and per capita incomes are approximately 50% less than those supported in districts 1 and 5. Mt. Vernon is an important industrial center that supports activities related to the production of apparel, electronics, machinery, food, fabricated metals, chemicals, precious metals, and printing. The city is larger than districts 1 and 5 but smaller than district 9 in Manhattan. Median household and per capita incomes are slightly higher than those in district 9.

VISITOR USE AND EXPERIENCE

Visitor Services and Programs

Each of the Manhattan Sites represents and interprets a significant individual or event in the history and formation of New York City and the United States. Opportunities for visitors to understand and learn about each site and its significance are available through interpretive displays, programs and various cultural activities. These opportunities are currently offered by the National Park Service, as well as by other government and private entities within and adjacent to the different sites. These activities vary from one site to another based on the types of activities and their appropriateness to a specific site. Specific examples of current program offerings and private cooperators are listed under each site.

Some of the Manhattan Sites are not as well known or as well advertised to the average New York visitor as major visitor attractions such as the Statue of Liberty, Ellis Island, the Empire State Building, and Times Square. As a result, the number of tourists at most of the sites is not high in comparison to other New York sites. Directional and informational signs on local streets or highways, as well as at the sites, is also inadequate.

Without specific knowledge of a particular site and its location, visitors have a difficult time reaching some of the sites because of their locations throughout Manhattan and Mt. Vernon. Local use of some of the sites, such as Castle Clinton and Grant's tomb, is associated with the surrounding parklands as well as the sites themselves. Special events or programs at the sites attract local residents as well as tourists.

Visitor Use Data

Statistical visitation data for each of the sites for the years 1980 to 1994 (where available) are presented under each site description. The annual level of visitor use varies from site to site ranging from less than 10,000 visitors at Saint Paul's to several million visitors at Castle Clinton; most sites have less than 150,000 visitors per year. At all but Theodore Roosevelt Birthplace, the number of site visitors is counted by NPS or volunteer staff with counting devices at the site entrance. At Theodore Roosevelt Birthplace, the number of fees is used as the number of visitors. For special events at all the sites, the number of people that fill one area is multiplied by the number of areas that are the same size and also filled with people.

Some analysis of park visitors (makeup of group, interests, activities, etc.) has been conducted at General Grant's tomb and the Battery Park area, which includes Castle Clinton. This information is discussed under these specific sites. Except for the data that was collected from these studies, little is known about the types of residents and visitors using and visiting the other sites. Visitor analysis for each of the sites, which would provide data pertaining to the types of visitors and use of the resources, is needed.

TRANSPORTATION

The five sites in the greater New York City area are accessible by private vehicle, taxi, bus, train, or subway. Public transportation

or taxis are encouraged because city streets are busy with traffic at all times. Both subway and bus lines are provided by the New York City Transit Authority. All sites, except Saint Paul's, are easily accessible by bus or subway. Saint Paul's, although accessible, is more difficult to reach because of its northern location and distance outside of New York City.

The National Park Service does not provide parking at any of the sites except for a few spaces at Saint Paul's Church. Parking is limited to available street parking, where permitted, adjacent to each site. Bus parking for tour groups is not available at most of the sites. This lack of parking further affects visitation levels.

OVERALL MANAGEMENT OBJECTIVES AND ACTIONS

MANAGEMENT OBJECTIVES

The Manhattan Sites are collectively managed and administered by one superintendent. Although each site has a distinct history and significance, the resources of the sites have similar conservation and preservation issues because they are in urbanized areas. The following management objectives, which apply to each individual site, provide a framework for conserving the sites' resources, integrating the sites into the surrounding areas and neighborhoods, and accommodating public use in accordance with NPS policy.

Preservation and Protection of Cultural Resources

- To preserve the sites' cultural resources in compliance with legislative and executive mandates, as well as NPS policies and historic preservation guidelines.
- To provide adequate curatorial collections storage and maximum security for the sites' collections.
- To exemplify efforts to preserve cultural resources and provide NPS expertise when requested.

Interpretation and Visitor Use

- To use all available historical information as well as materials and artifacts for interpreting the Manhattan Sites in a manner consistent with NPS policy.
- To ensure appropriate consideration for visitors with special needs in planning, developing, and managing each of the sites.
- To develop and implement an educational curriculum for site interpretation that is consistent with state standards.
- To develop and implement a comprehensive visitor and resource protection program to ensure the preservation of resources and that visitors have a safe, secure, and educational visit.

Administration

- To increase the sites' allotted operational budgets and number of full-time equivalent employees to adequately preserve the resources and provide for visitation.
- To increase staff professionalism through various strategies, including increased training, details, and other work assignments.
- To promote effective public relations, cooperation, and partnerships with local, state, and federal agencies, nonprofit organizations, and private groups and individuals.

MANAGEMENT ACTIONS

This section applies to the five sites discussed in this document and sets forth management actions that would be undertaken on the sites under any of the alternatives.

Cultural Resource Management Actions

Proposed strategies for managing cultural resources are in response to the identified issues. Under any alternative, the National Park Service would manage cultural resources, including potential archeological resources at some of the sites, according to NPS policies and guidelines. Relevant

structural evaluation and preservation actions would be applied to structures at all five sites to protect and enhance existing resources. Specific actions would be taken to identify, document, and protect the known and any previously unrecognized resources.

Resources would not be impaired or destroyed by the type or amount of use they would receive under the different alternatives, and management strategies must reflect the intent to manage or even limit use of the resources to ensure that they are not compromised. However, before actions can be taken to prevent damage to the sites' cultural resources, it is necessary to determine exactly what is there, what is the best strategy for preserving and/or protecting the particular resource, how best to maintain it, and how much use it can tolerate without degradation. Several studies are needed at the sites to determine and document the needs of the cultural resources (see later "Future Plans and Studies" section).

Historic Settings. Historic settings and the components that make up the landscapes that exist at Castle Clinton, General Grant, and Saint Paul's Church would be evaluated and documented in future reports so that the National Park Service has adequate data for accomplishing ongoing maintenance without compromising those settings and landscapes.

National Register Nominations. All of the sites are listed on the National Register of Historic Places. However, review and revision of all national register nominations would be needed, especially for General Grant's tomb and Saint Paul's Church. Prepared under old national register guidelines, none of the nominations contain enough data to provide full understanding of the history of each of the sites, as well as the guidance for managing and preserving the sites. The resources are described only minimally, and criteria for significance and contributing elements are inadequate.

Collections Management. Excluding the no-action alternatives, collections and archives for each site would be managed under NPS standards and guidelines for protecting the resources and information. They would be exhibited or stored in appropriately controlled environments with protection against atmospheric elements, pest infestation, accidents, theft, and vandalism, and would be periodically examined to ensure protection. Each of the sites has a museum collection, with Theodore Roosevelt Birthplace having the greatest amount of artifacts. Federal Hall stores the collections of Castle Clinton, Federal Hall, General Grant, Hamilton Grange, and part of Saint Paul's. The collection of Theodore Roosevelt is stored exclusively at that site.

Ethnographic Resources. Ethnographic resources are cultural and natural features — including sites, structures, objects, landscapes, flora, and fauna — that have traditional significance to contemporary peoples and communities. NPS management policies and resource management guidelines require the inventorying of lands and resources of importance to these park-associated groups in addition to consultation with them when federal actions may impact such resources.

Reliable information about ethnographic resources also supports management efforts to make and implement informed decisions; establish and maintain productive relationships with interested community members and groups; and enhance visitor services, including interpretive programs and amenities. Information also assists management in complying with the documentation and consultation requirements of the National Historic Preservation Act, the National Environmental Protection Act, the Archeological Resource Protection Act, the Religious Freedom Restoration Act, the American Indian Religious Freedom Act, and the Native American Graves Protection and Repatriation Act.

Ethnographic resources for Manhattan Sites have yet to be systematically surveyed. Preliminary information suggests that known and potential ethnographic resources are

largely site specific and, in most cases, have multiple resource values that can lead to conflicting preservation approaches. Depending on the resource and use, traditionally associated groups include direct descendants, contemporary park neighbors, and regional and national constituencies.

Notably, the significance of Manhattan Sites' ethnographic resources may or may not be tied to other cultural or natural resource values or to people and/or events officially commemorated by the site where they occur. To develop effective protection strategies, further study to identify and document ethnographic resources and associated groups is required.

Local Issues

Any illegal activities that occur within or near the sites would continue to be handled in accordance with NPS law enforcement policies in cooperation with the New York Police Department. Social issues, such as the homeless, would be addressed as the situation demands.

Federal Actions to Address Environmental Justice

Under policy established by the secretary of the interior to comply with Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," departmental agencies must identify and evaluate any anticipated effects, direct or indirect, from proposed actions on minority and low-income populations and communities, including the equity of the distribution of the benefits and risks.

If any significant impacts on minority and low-income populations and communities are identified, the environmental document should clearly evaluate and state the environmental consequences of the proposed project or action on minority and low-income populations and communities in the environmental document.

However, for each of the Manhattan Sites discussed in this document, there would be insignificant or no impacts on minority/low-income populations.

The National Park Service would continue to work with appropriate community districts and the city to address the issue of the homeless at each of the sites. The actions under some of the alternatives might displace some homeless people. However, these individuals would likely move to a nearby areas. The homeless people use Castle Clinton and Grant's tomb not because they are Castle Clinton and Grant's tomb, but because they happen to be in areas that suit their needs (such as Battery Park and Riverside Park). If Castle Clinton or Grant's tomb did not exist, homeless people would still likely use these park areas. Therefore, none of the actions proposed at the sites would result in significant impacts on these individuals.

If relevant, the issues related to the executive order on environmental justice are discussed under the socioeconomic impacts for those particular sites and alternatives.

Visitor Use and Interpretation

All structures open to the public would be made accessible to all visitors and employees to the fullest extent possible. In some instances, such as General Grant's tomb and Theodore Roosevelt Birthplace, it may be difficult to achieve full access to historic properties without compromising their architectural integrity and significance. If the National Park Service, in consultation with the state historic preservation officer, determines that full accessibility compliance would have a negative effect on a historic property, then providing a lesser level of accessibility (programmatic accessibility) may be acceptable. This plan analyzes approaches

to making the sites more accessible to special needs groups.

The visitor experience describes what people would do, see, and learn when they visit each of the Manhattan Sites. There are three aspects of the visitor experience: orientation/information, interpretation/education, and recreation. At the Manhattan Sites, some of these aspects are more pronounced than others.

Teaching visitors the history and significance of each of the sites and why each was established is an integral part of the preservation of the sites and their resources and the foundation of interpretation. What are the stories, or themes, to tell? Which are the most important? How will the National Park Service tell them? Interpretation is a process of education that is designed to stimulate curiosity and convey messages to the visiting public.

Interpretive themes are those ideas, concepts or stories that are central to the park's/site's purpose, identity, and visitor experience. The interpretive activities are described for each site's alternatives. The themes apply to all of the alternatives for each individual site. A major difference among the alternatives is the degree and means by which the themes would be addressed and interpreted, with every visitor having access to those ideas, concepts, and stories. The themes will provide direction for planners and for designers of interpretive media such as exhibits, publications, and audiovisual and personal programs.

At all the sites, any updated brochures, wayside exhibits, and other interpretive media would be accessible, to the fullest extent possible, to non-English-speaking visitors and those with disabilities. Research and visitation evaluation would need to be conducted to determine the needs that are to be addressed. Any multilingual media would include the most widely spoken foreign languages, which would be determined by visitation statistics.

Staffing

The location of the sites, with a lack of available nearby housing, makes the staffing, temporary as well as seasonal, difficult to attract and retain. New York City housing is expensive, and affordable housing near the sites is often difficult to find. Park housing at the sites is not available. However, options such as the housing proposed at Hamilton Grange (in the new building) may be available in the future. Other national park system sites, such as Gateway, might also be an option for staff housing in the future. This issue needs further investigation and evaluation.

Physical Development

At any of the sites, physical alteration or construction of a new facility may be needed to accommodate management objectives. Under all alternatives for each of the sites, the National Park Service would make development decisions for NPS-owned properties. The additional visitor contact points, the scope of activities offered, and the requirements for administration and maintenance facilities would vary, depending on the alternatives selected. Management zones provide general guidelines for appropriate levels of preservation, development, and activity in each zone.

Visitor activities and facilities must be analyzed at each site to ensure that valuable resources would not be damaged by actions of the alternatives. For this analysis, site-specific resources would be assessed. The appropriateness for development and activities would be determined based on the analysis. All development would be compatible with the existing resources and incorporate sustainable design techniques. For example, new construction or land alteration would reflect a respect for the cultural and natural environments of and around the sites.

Future Acquisitions of Land

The National Park Service owns all of the sites and the land base for the structures. Because these sites are within urban areas, very little land base around the perimeter of the structures is owned by the National Park Service. At Saint Paul's Church, the boundary of NPS ownership includes the structures and cemetery and a border of land around them. Some of the actions under the alternatives for Castle Clinton and General Grant involve the acquisition of city-owned property. These actions will be addressed under the separate plans for these sites.

Some of the proposed actions in this plan could affect lands owned and administered by the city of New York. Mutual agreements with the city would be sought to best provide protection and management for these areas. Any boundary adjustments appear to be of limited extent and the National Park Service might have authority to acquire them under the minor boundary adjustment legislation if there were no anticipated objections. For the actions that propose land acquisition by the National Park Service, the National Park Service would evaluate the potential for exchange of other federal lands with the city to fulfill management objectives for the parties involved. However, before implementing the actions proposed, a thorough and specific analysis of available lands for exchange would be conducted by the National Park Service in cooperation with the city of New York.

The actions related to these changes of ownership and boundary adjustments would be specifically addressed in a future land protection plan, which would be completed before implementing any related actions. Within that plan, specific and available lands for exchange would be analyzed. It is beyond the scope of this *General Management Plan* to address and evaluate specific properties for exchange.

A generic exchange authority available to the National Park Service is set forth in the 1968 amendments to the Land and Water Conservation Fund Act that provides, among other things, authorization for the secretary of the interior

> to accept title to any non-Federal property . . . within a unit of the National Park System . . . and in exchange he may convey to the grantor of such property . . . any Federally-owned property . . . under his jurisdiction which he determines is suitable for exchange . . . and which is located in the same state as the non-Federal property to be acquired. (16 USC §4601-22[b])

This authority also allows for the exchange of tracts of land within the boundaries of a park unit. The Federal Land Exchange Facilitation Act of 1988 (Public Law 100-409 H.R.1860) finds that

> land exchanges are a very important tool for Federal and State land managers and private landowners to consolidate Federal, State, and private holdings of land or interests in land for purposes of more efficient management and to secure important objectives . . . and needs for landownership adjustments and consolidation consistently outpace available funding for land purchases by the Federal Government and thereby make land exchanges an increasingly important method of land acquisition and consolidation for both Federal and State land managers and private landowners.

If a cooperative agreement is reached between the National Park Service and the city of New York to facilitate land transfers as identified in some of the alternatives, the National Park Service would seek boundary adjustments in accordance with federal laws and regulations.

Carrying Capacity

Carrying capacity is the type and level of visitor and public use that can be accommodated while sustaining the desired resource protection and visitor experience that achieve the purposes and the management objectives for each site. The amount of and kind of visitor use permitted must be influenced by the need to preserve and conserve each site's structures and resources. Effective management of visitor and public use, sensitive facility and infrastructure design, and educated location decisions help to allow the maximum number of visitors without affecting site resources.

The proper carrying capacity for each site and its collections has been determined individually and specifically. At some of the sites, such as Theodore Roosevelt Birthplace, it might be necessary to limit the number of tours, the number of people in a tour, and/or the number of people allowed into the building at one time to ensure that visitation would not adversely affect the stability or integrity of the cultural resources. The capacity of each site is discussed under its management plan.

Partnerships and Cooperation

The partnership concept has been around for quite a while; it has only been rediscovered since the late 1980s. NPS management in general, and Manhattan Sites in particular, are keenly aware of the potential for and highly interested in cultivating new partners for preservation. This document explores opportunities for developing new approaches to resource protection and visitor experience enhancement with long-time collaborators. Mr. Ervin H. Zube, NPS consultant and participant in several partnerships conferences, has characterized partnerships as including "common visions and goals, trust and harmony, and shared ownership. Effective communication and cooperation are essential." These general management plans for the different sites and resources within the Manhattan Sites unit of the national park system open fresh opportunities for collaborative dialogue and partnering to the potential benefit of resources throughout the New York City metropolitan area.

FUTURE PLANS AND STUDIES

The following is a discussion of standard NPS plans and studies that would be done.

Cultural Resource Management

This section addresses the studies and plans that would be required for protecting, preserving, and managing the cultural resources throughout the Manhattan Sites. These studies and plans assist managers in making even better decisions about managing these resources in the future. The information in these reports and studies would be an adequate database for preserving and maintaining the cultural resources within historic districts, landscapes, and settings.

- comprehensive administrative history for Manhattan Sites
- ethnographic overview and assessment reports for Saint Paul's Church and Theodore Roosevelt Birthplace
- cultural landscape assessments for Castle Clinton, Grant's tomb, and Saint Paul's Church, which would be developed into cultural landscape reports
- updated cultural resource management plans
- exhibit plan for all five sites
- special history study for Castle Clinton and Saint Paul's Church
- revised national register nomination and historic landmark information for all five sites.
- updated historic structure reports for Castle Clinton, Federal Hall, General Grant's tomb, and Saint Paul's Church
- collection condition survey for all five sites

- finalized collection management plan, with scope of collection statement, for Manhattan Sites
- collection storage plan for Manhattan Sites
- archeological survey for Castle Clinton, General Grant's tomb, and Saint Paul's Church
- visitor use analysis for all five sites

Although these sites are listed on the National Register of Historic Places, documentation forms would need to be revised and finalized to more concisely document the historical significance of the cultural resources, especially for Grant's tomb and Castle Clinton.

Collections and archives would be managed under standards and guidelines for protecting the resources and historic data. The collection would be exhibited or stored in appropriately controlled environments with adequate protection against theft, atmospheric elements, pest infestations, and vandalism. Furthermore, consistent monitoring would be done to ensure preservation and protection.

Additional research must be undertaken to further document provenance and status of the collections, both NPS and non-NPS collections, that might become available for the National Park Service to exhibit.

Before any preservation or restoration work on any of the sites that is not routine maintenance, the National Park Service would ensure that suitable documents have, or will be, prepared to provide sufficient data and recommendations for accurate restorative and interpretive actions. These documents would direct the National Park Service on which actions can be undertaken and how they should be accomplished.

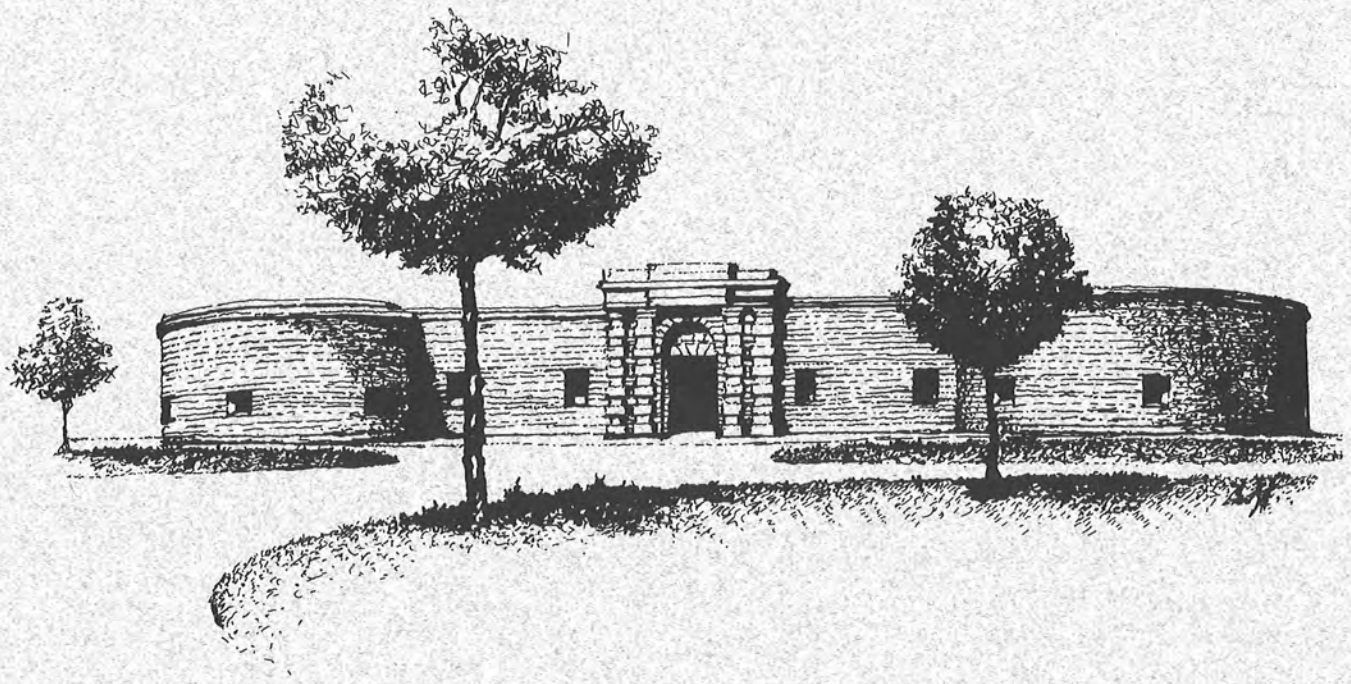
Natural Resource Management

The natural resources at the sites within Manhattan Sites are an integral part of the historic scene. Other than at General Grant's tomb where some resources are important in supporting a nesting pair of peregrine falcons, natural resources at each site would be managed to support interpretation of themes and historic structures. Overall, natural resource management in the park supports cultural resource management objectives.

According to the NPS *Natural Resource Management Guidelines* (NPS-77), the development of an up-to-date inventory of natural resources in each park is important, including historical sites. Only when a manager has an accurate picture of the type and condition of the natural resources at a site can effective management decisions be made. Natural resources are constantly changing; thus, a program of long-term monitoring is also essential. Monitoring can help detect changes in resource conditions before unacceptable changes occur.

Studies and/or actions that would assist in managing all five sites include the following:

- integrated pest management program which monitors, reduces or eliminates nonnative species that pose a threat to cultural resources
- the maintenance of current information on air quality from state, local, and federal monitoring stations and documentation of effects on park structures (including tombstones) and vegetation. Information collected should be used to manage and protect cultural resources (e.g., gravestones at Saint Paul's) from future deterioration
- photo documentation program that would establish photographic records of viewsheds and adjacent land use patterns for future reference
- comprehensive baseline resource inventories for all sites



NATIONAL PARK SERVICE
DEPARTMENT OF THE INTERIOR

Castle Clinton

National Monument

Manhattan Site • New York

SITE DESCRIPTION AND BACKGROUND

Castle Clinton National Monument is in the Battery, the southern tip of Manhattan, overlooking New York Harbor where the East and Hudson Rivers join (see Castle Clinton Neighborhood map). Battery Park, surrounding the structure, is bound by the harbor to the west, east, and south and the financial district of New York to the north. Although Battery Park has tress, grass, flowers, walkways, benches, and promenades, the environment immediately surrounding the park is a highly complex urban environment.

Castle Clinton, originally a fortress that guarded the city, is a single-tiered, open-casemated structure, almost circular in plan (about 26,000 square feet in area) and constructed of sandstone blocks. The facility is now used for two separate functions: as a historic site with its own interpretive focus and as a ticketing facility for the Statue of Liberty–Ellis Island ferry.

SIGNIFICANCE

Castle Clinton National Monument has seen many changes in the growth and culture of New York City. The structure was one of the New York Harbor defenses built just before the War of 1812. Later it became a great entertainment complex, then an important immigrant processing station, and then an aquarium. The National Park Service carried out a restoration campaign, completed in 1975, that restored the structure to its original fortress configuration.

PURPOSE AND NEED

The purpose of this plan is to guide future management of Castle Clinton National Monument and to resolve issues related to the Statue of Liberty–Ellis Island ferry ticketing and interpretation of the structure's history.

ISSUES TO BE ADDRESSED IN THIS PLAN

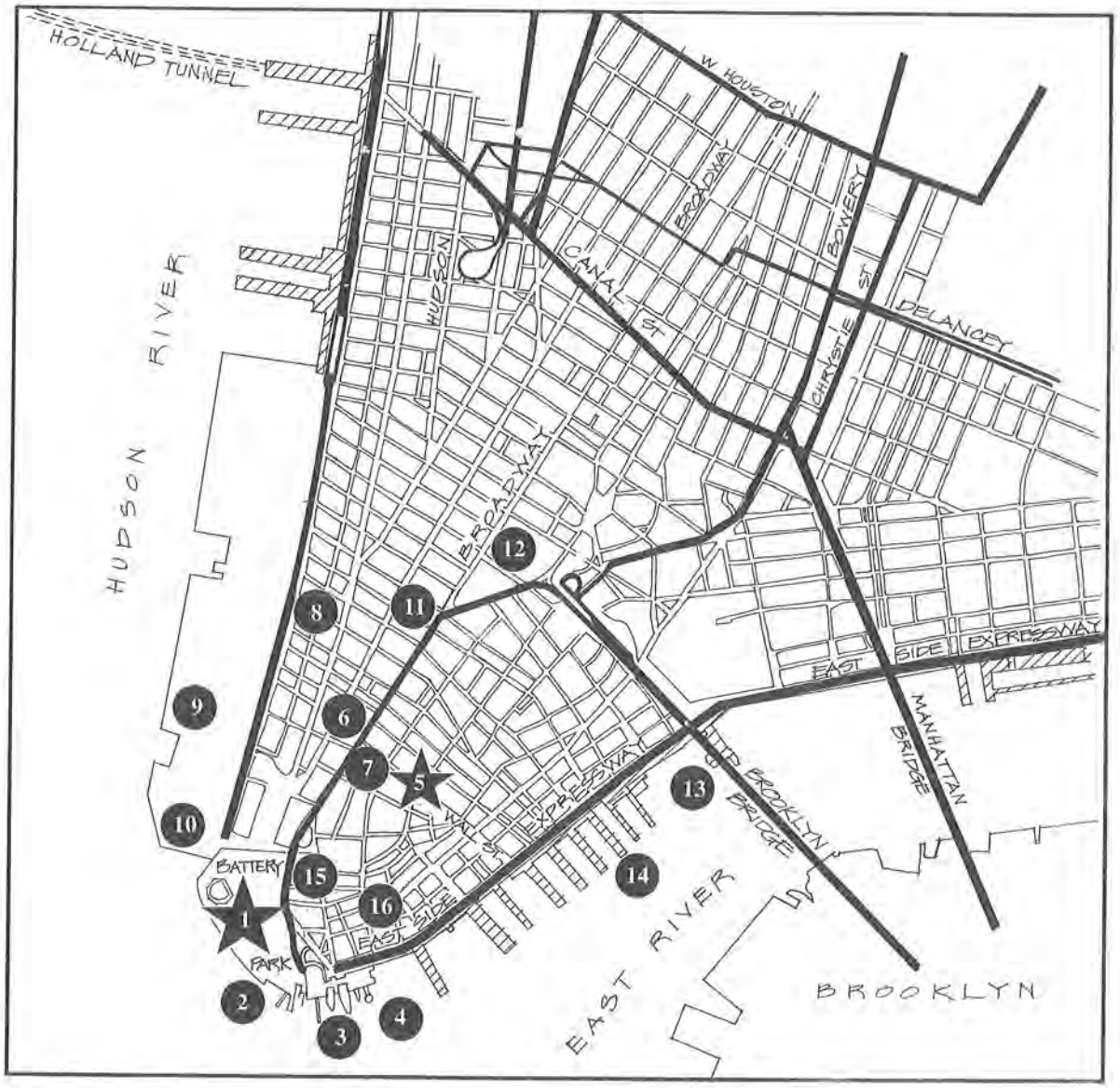
Ticketing sales for the Statue of Liberty and Ellis Island, located inside the fort structure, attract many visitors. However, this ticketing procedure often interferes with public understanding of the castle as a national monument with its own history. At times, especially during summer months and holidays, extensive ticket lines/crowds make it difficult to see Castle Clinton and its exhibits or find the Statue of Liberty ticketing office. Crowd control measures are often necessary during peak visitation. Restrooms in the fort are inadequate to serve the large number of visitors waiting for tickets. Because NPS landownership is confined to the fort, there is no opportunity to provide NPS facilities outside the fort.

Also, the fort configuration is not conducive to interpretation of other time periods (such as the entertainment complex or immigrant processing station) in the long history of the castle or for cooperator activities. Opportunities for public gatherings, such as concerts, is also limited by weather and space. The many visitors with limited English language skills are poorly served by English-only information and interpretation, including exhibits and brochures. The facilities and the staff levels at Castle Clinton are insufficient for the number of visitors.

The homeless people that live in and use the Battery Park area at times use Castle Clinton as a temporary shelter during bad weather and evening hours. This situation causes security and safety concerns.

The structure has pest-related issues. Wildlife, specifically squirrels and pigeons, are damaging the historic fabric of the structure as well as maintenance and other equipment.

1. CASTLE CLINTON NATIONAL MONUMENT
2. FERRY TO STATUE OF LIBERTY AND ELLIS ISLAND
3. FERRY TO STATEN ISLAND
4. FERRY TO GOVERNORS ISLAND
5. FEDERAL HALL NATIONAL MEMORIAL
6. TRINITY CHURCH
7. NEW YORK STOCK EXCHANGE
8. WORLD TRADE CENTER
9. BATTERY PARK CITY
10. PIER A - NYC FIRE DEPARTMENT
11. WOOLWORTH BUILDING
12. CITY HALL
13. BROOKLYN BRIDGE
14. SOUTH STREET SEAPORT MUSEUM
15. SMITHSONIAN NATIONAL MUSEUM OF THE AMERICAN INDIAN
16. FRAUNCES TAVERN



NEIGHBORHOOD
Castle Clinton National Monument
Federal Hall National Memorial

United States Department of the Interior/National Park Service
DSC / Jan. 1996 / 395 / 377 / 20,023

NORTH 0 1/4 1/2 MILE

ALTERNATIVES FOR DEVELOPMENT AND PRESERVATION OF CASTLE CLINTON NATIONAL MONUMENT

INTRODUCTION

Interpretive themes and objectives and three alternatives have been developed for the management of Castle Clinton National Monument. Alternative 1, the no-action/ continuation of existing management alternative, would continue existing management of the site. Alternatives 2 and 3 give different management options and site uses. Castle Clinton contains unique resources that would be protected and interpreted under any of the alternatives.

Interpretive Themes

Under any of the alternatives following, interpretive activities at Castle Clinton would interpret the history and evolution of the site, reflecting the changing roles and growth of the country through the evolution of Castle Clinton and how it provides a record of the changing intellectual and physical needs of New York City and the nation. The following primary themes would be used to interpret the site:

- Castle Clinton was an integral link in the New York Harbor defense system during the War of 1812 and continued to provide protection during the development of the young nation.
- The conversion of Castle Clinton to Castle Garden reflected the development of the need for a place of public entertainment and larger cultural events in New York City.
- The conversion of Castle Garden to the first immigration processing station reflected the influx of large numbers of immigrants into America; the immigrants would contribute to the development of a culturally diverse American people.
- The conversion of Castle Garden into the New York City aquarium reflected growing popular interest in scientific knowledge in the late 19th and early 20th centuries.
- The growing historic preservation movement in the United States is reflected by the site being saved from demolition in the 1940s and its reconstruction in the 1970s.

The difference in the interpretation of these themes in the three alternatives would be the time period(s) interpreted and the depth of interpretation. Alternative 1 would continue existing interpretation of the themes, which focuses on the fortification period as well as the changes and development of the site. Alternative 2 would primarily interpret the fortification period, and alternative 3 would provide the space and means to interpret the entire history of the structure (an in-depth treatment of each theme).

Visitor Experience

The National Park Service has the following goals for visitors.

- Visitors could understand the role of Castle Clinton in protecting New York City and its relationship to the evolution of the harbor and coastal defenses.
- Visitors could understand the site's significance in America's cultural development.
- The public could understand and appreciate the National Park Service's role in preserving our cultural heritage and support those preservation efforts.
- The public could have opportunities to participate in cultural activities at the site.

- Ticket sales for the Statue of Liberty–Ellis Island would not impact the interpretive experience at Castle Clinton.

ACTIONS COMMON TO ALL ALTERNATIVES

The ticketing operations for Statue of Liberty–Ellis Island (through the Circle Line/ Statue of Liberty Ferry, Inc.) that are based inside Castle Clinton would be improved through more efficient sales methods and management.

The original 1811 fort walls would be left in place and the historic fabric would be preserved and protected.

Because Castle Clinton is a site on the Heritage Trails New York, information on various points of interest throughout Manhattan would be available at the castle. New bulletin cases and waysides would include the history of Castle Clinton, a map and location of other national park system sites, and the ferry schedules for the Statue of Liberty and Ellis Island. New or upgraded exhibits and special programs would be provided, as would updated brochures. The brochures and exhibits, with multilingual information, would also be accessible to visitors with visual and physical limitations.

NPS regulations require that no critical actions occur within the 100-year floodplain without sufficient corrective or mitigative actions. Critical actions include storing hazardous materials, constructing facilities from which rapid evacuation would be difficult, or storing or displaying irreplaceable documents or objects (i.e., collections, artifacts, and historic furnishings). Because the site is in the 100-year floodplain, original collections would continue not be used for permanent exhibits and the collection would continue to be stored at Federal Hall. If a temporary exhibit using original artifacts were installed, special precautions (such as floodproofing) would be taken to ensure their protection and safety.

Site security would continue; the structure is locked and patrolled during non-use evening hours to protect the resources and discourage overnight use.

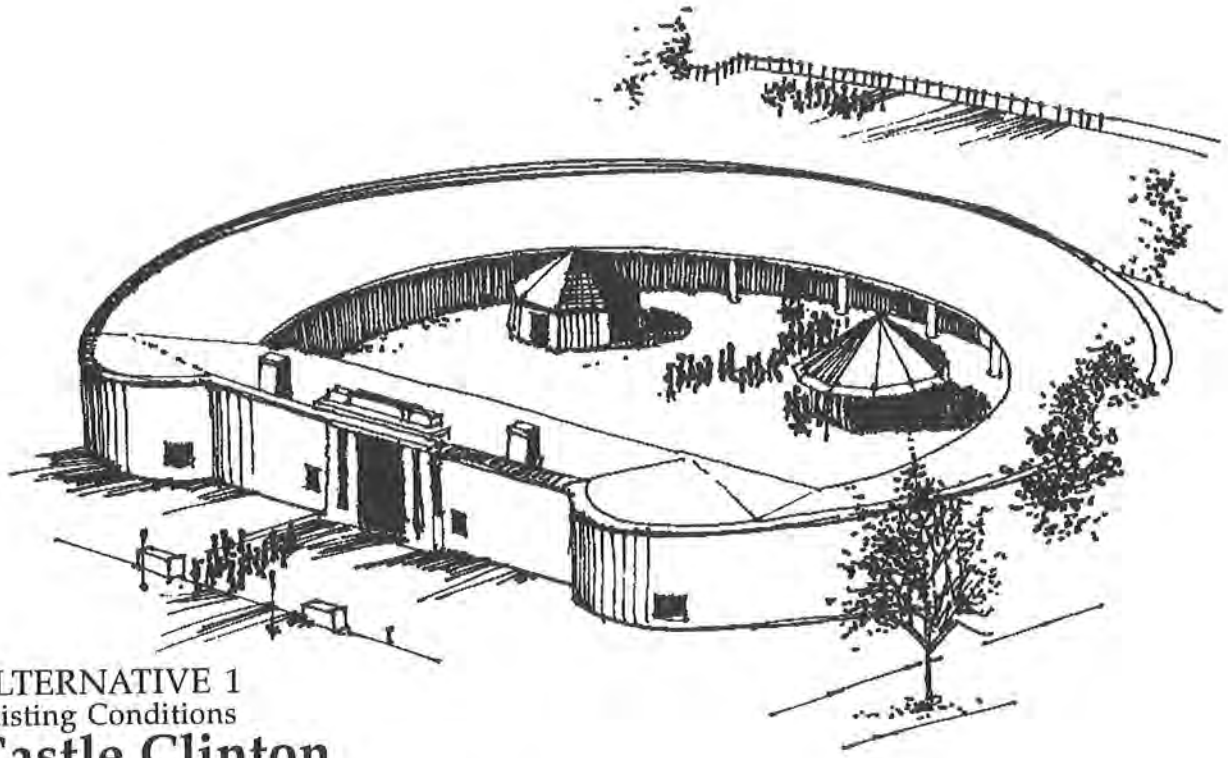
Pest management at the site would continue under all alternatives. Different techniques, such as netting and storage practices, are being used to control pest infiltration of the structure and avoid damage to the structure, exhibits, and maintenance equipment.

ALTERNATIVE 1: NO ACTION / MINIMUM REQUIREMENTS

Alternative 1 describes a continuation of existing management and the meeting of minimum requirements, which would bring little change to the site. The current fort appearance and preservation activities would continue (see Castle Clinton, Alternative 1, Existing Conditions).

The National Park Service would maintain the ticketing pavilions and collaborate with the Circle Line/Statue of Liberty Ferry, Inc. (through the Statue of Liberty National Monument) to improve ticket sales management. Physical changes such as installing stanchions and ropes would be installed to better define the ticket lines.

Existing interpretation would also continue, although exhibits representing the site's four eras in history would be upgraded to interpret the historical continuum of the site and would use reproductions of prints and photographs. The primary focus of the exhibits would be the role of Castle Clinton in the evolution and growth of New York City and the nation (described above in the interpretive themes). The number of tours of Castle Clinton would be increased but would continue to be limited by staff availability and physical congestion due to the ticket sales lines. During the slower periods in winter and spring, tours would continue on a schedule but would also be flexible and occur as needed.



ALTERNATIVE 1
Existing Conditions
Castle Clinton
National Monument
United States Department of the Interior/National Park Service
DSC / Dec. 1995 / 395 / 20,001A

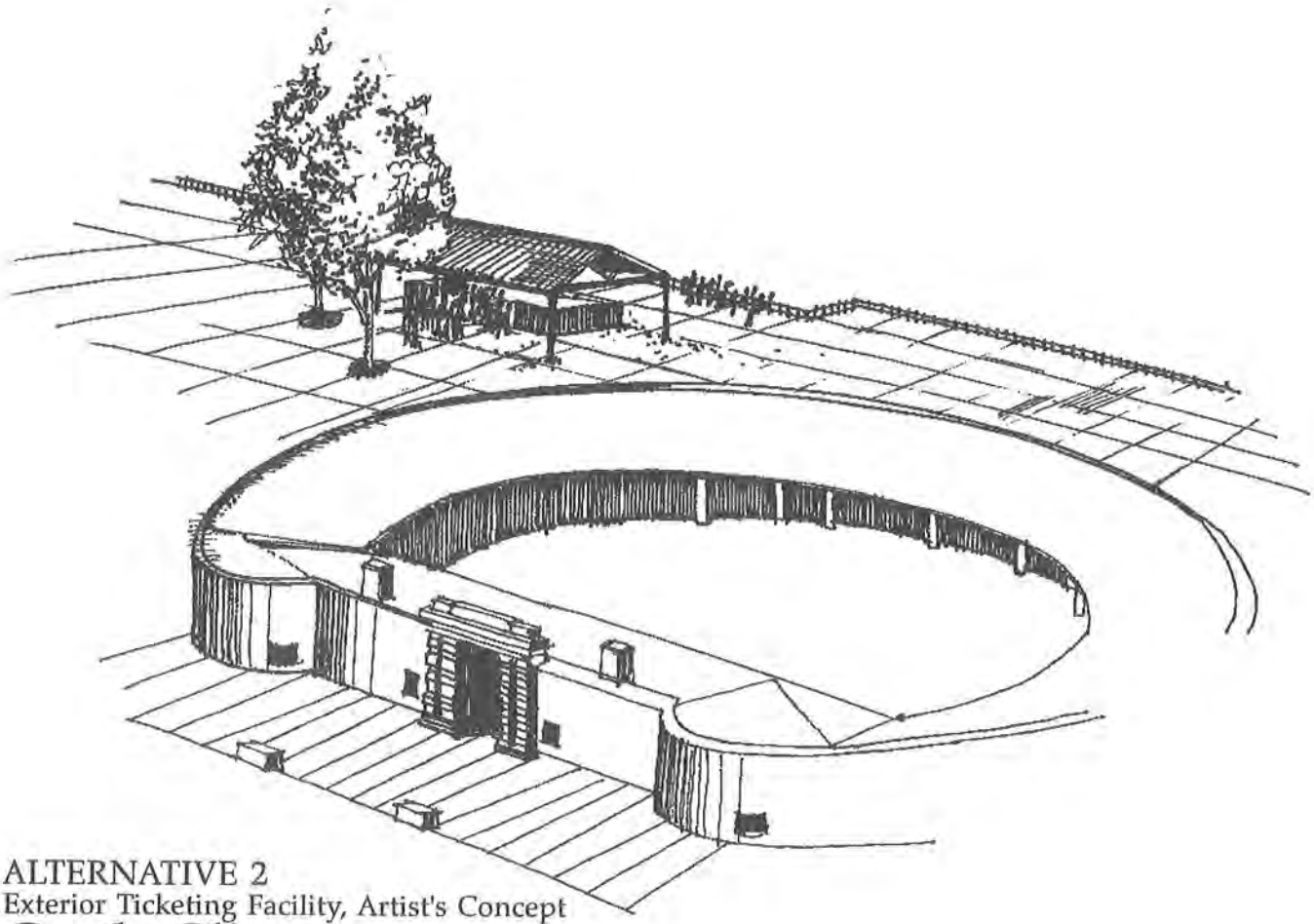
The restrooms at the site would be upgraded but not expanded. The National Park Service would continue to work with city's Department of Parks and Recreation to enhance the condition and availability of public restrooms in and around Battery Park, including development of the Pier A visitor center (described in the later "Affected Environment" section under "Regional Land Use and Visitor Facilities").

The limited administrative office and maintenance space and space for storing supplies, materials, and equipment would not change.

The entire site would be managed as a historic zone, which would preserve, protect, and interpret the site's cultural resources and their settings. No additional facilities would be developed. Staffing for this alternative would continue to be eight full-time employees and annual operational costs about $468,000. This would be the least costly alternative to implement (see appendix C), requiring about $1 million for implementation and interpretation.

ALTERNATIVE 2: REMOVAL OF TICKET SALES AND ENHANCEMENT OF VISITOR USE

Alternative 2 would also continue the preservation of the historic structure. The ticketing pavilions would be removed to provide more space and an enhanced interpretive experience for visitors (see Castle Clinton, Alternative 2 — Exterior Ticketing Facility, Artist's Concept). The interior area currently used for ticket lines would be used as a visitor orientation area.



ALTERNATIVE 2
Exterior Ticketing Facility, Artist's Concept

Castle Clinton
National Monument

United States Department of the Interior/National Park Service
DSC / Dec. 1995 / 395 / 20,002A

Various options, or perhaps a combination of options, would be possible for relocating/improving the ticketing function, including

- returning ticket sales to the original ticket sales building, which would need to be renovated
- relocating the ticketing kiosks from the castle to an area within Battery Park
- building a new structure in the area, perhaps on the Battery Park Promenade, which could serve many additional functions, such as providing shade and rain cover and video orientation for waiting passengers

Additional funds for developing a ticketing facility could come from a congressional appropriation or through an agreement with the Circle Line/Statue of Liberty Ferry, Inc. The cost would be based on the option selected. Relocating the ticket sales function could require a boundary adjustment and would require extensive cooperation and consensus among many parties including the city's Department of Parks and Recreation, other city agencies and advisory boards, and the Circle Line. The National Park Service would work with the city's Department of Parks and Recreation to seek a new location for the ticketing facility in city-owned and administered Battery Park. Developing this consensus and implementing this alternative

would be a complex and involved process. The resolution for the location of ticketing sales would be the responsibility of the Manhattan Sites and Statue of Liberty National Monument superintendents, the ferry boat concessioner, and the city's Department of Parks and Recreation.

Additional exhibits inside the castle would be developed using copies of historic photographs and prints, emphasizing the fortification period of Castle Clinton. Expanded interpretive programs, including summertime concerts and plays, special-event reenactments, and costumed interpretation, would convey the rich and colorful history of Castle Clinton, also emphasizing the historic fort period. A brief history of the other time periods and use of the structure would be minimally interpreted.

The number of people coming to the site would decrease (due to the removal of ticket sales); however, the number of visitors coming to see the site itself might increase because of the improved exhibits and interpretation.

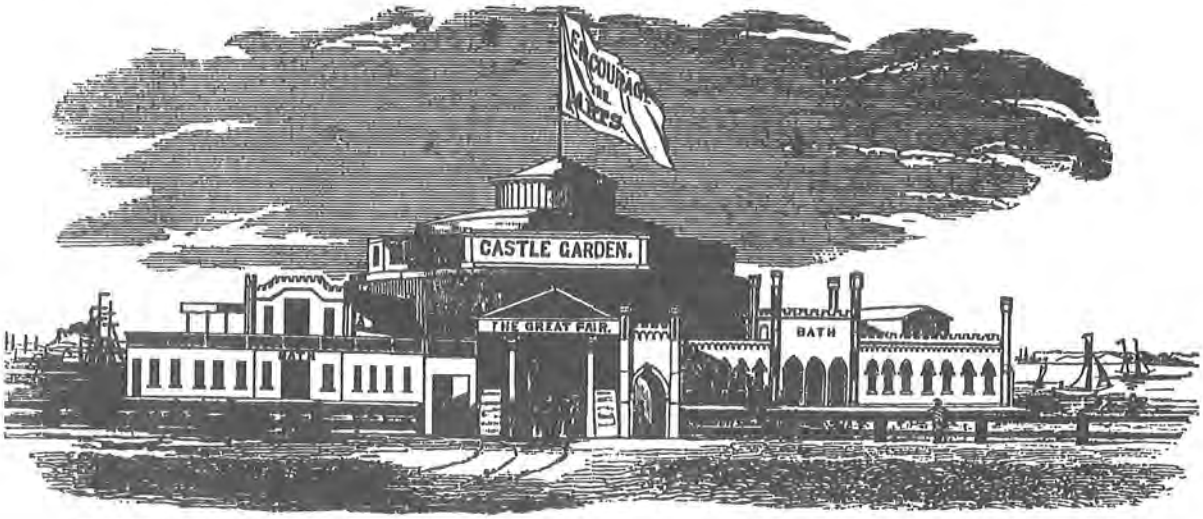
Although the restroom facilities would be upgraded, the capacity would remain the same. The National Park Service would continue to work with the city's Department of Parks and Recreation to enhance the condition and availability of public restrooms in and around Battery Park, including development of the Pier A visitor center (described in the later "Affected Environment" section under "Regional Land Use and Visitor Facilities").

Under this alternative, the entire Castle Clinton site would be managed as a historic zone. Limited staff and maintenance space would remain the same. The staffing for this alternative would require 10 full-time employees, and the annual operational costs would be about $550,000. This alternative would be more costly than alternative 1 but less than alternative 3 to implement (see appendix C), requiring about $2 to $2.5 million for implementation and interpretation, depending on whether a new ticketing facility is built.

ALTERNATIVE 3: PROPOSED ACTION — CONSTRUCT A PERFORMANCE FACILITY FOR USES CONSISTENT WITH CASTLE GARDEN ERA

Under this preferred alternative, Castle Clinton would be redesigned to accommodate cultural and performance uses reminiscent of the Castle Garden era (1823-55). This alternative would also permit the fullest interpretive use of the resource (see Castle Clinton, Alternative 3 — Construct Performance Facility — Historic View – 1852). A partnership between city, state, appropriate private organizations, and the National Park Service would be formed to administer the redevelopment of Castle Clinton. Different management options for Castle Clinton would be considered, including NPS management with cooperators. The development of this alternative would reestablish the site as a year-round center for cultural events and performances and would significantly enhance related private and public sector initiatives to revitalize historic Battery Park and all of lower Manhattan.

A roofed structure would be constructed substantially within and above the 1811 walls, leaving those walls in place and preserving all of the surviving historic fabric of the fortification. The roof would be a new design, using modern materials and modern construction methods. Insufficient documentation about its original appearance precludes a reconstruction of the Castle Garden era structure in accordance with NPS policy and the *Secretary of Interior's Standards for the Treatment of Historic Properties.* Substantial research and review would be required to ensure that the new structure was in conformance with these policies and standards.



ALTERNATIVE 3
Construct Performance Facility — Historic View 1852

Castle Clinton
National Monument

United States Department of the Interior • National Park Service
DSC / Feb. 1996 / 395 / 20,018

The construction of a structure within the fort walls would probably not require additional land or a boundary adjustment if the design of the new structure remains within the confines of the existing building. However, if the final design requires additional land, the National Park Service would work with the city to acquire land around the fort structure to support the design.

Ticket sales would either remain inside the structure, or, as in alternative 2, be relocated nearby. If a boundary change were required, it would facilitate operational and management issues that pertain to park administration and visitor use at the site (*Special Directive 92-11*, 2A).

During the construction phase, in concurrence with the Department of Parks and Recreation, city-owned land would temporarily be used for construction. A cooperative agreement would be drawn up between the National Park Service and the city.

The new structure would have to conform to floodplain management, requiring that any new construction within floodplains be built to withstand flooding.

The new structure would contain a multipurpose and adaptable stage and auditorium seating, extensive visitor service facilities, including new restroom facilities, and adequate space for maintenance and administration of the site. These changes would provide efficient use of space, increased security, and visitor use through evening hours and inclement weather.

The National Park Service would collaborate with the Circle Line/Statue of Liberty Ferry, Inc. (through the Statue of Liberty National Monument) to improve ticket sales management through advanced techniques, such as computerized ticket sales and reservations.

New exhibits and programs, accessible to foreign visitors and visitors who are hearing or visually impaired, would convey in-depth the entire history of the site. Interactive exhibits would describe the history and growth of New York City and explain how

the needs of residents brought about the physical changes to the site, including military protection, immigrant processing, and entertainment activities.

With enhanced security and climate control devices, temporary exhibits using original artifacts could be installed. However, special precautions would be required to ensure their protection and safety. The additional space would allow room for an orientation area that could feature an audiovisual presentation on the history of the site. Other topics relating to the National Park Service and the Heritage Trails New York would also be conveyed. All audiovisual programs would be accessible to the visual and hearing impaired.

A full range of entertainment events in keeping with the Castle Garden era would be provided. National repertory companies as well as community organizations, local artists, and performing arts groups would have access to the space. The programs would be directed towards community audiences and school groups as well as the general public. There are a number of options for managing the entertainment programs, including direct NPS management, the National Park Service working with a cooperator, or contracting with a professional entertainment management organization.

The site would be managed as a park development zone, which would provide park development to serve the needs of park management and visitors but would visually alter the fort site. Additional NPS, cooperator, and/or contract staff people would be required to operate the site and manage programs. Twenty full-time employees would be needed for staffing for this alternative, and about $1 million would be required for annual operational costs. This alternative would be the most expensive of the three alternatives (see appendix C), requiring about $18 million for implementation and interpretation.

TABLE 1. SUMMARY OF ALTERNATIVES FOR CASTLE CLINTON

	ACTIONS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2	ALTERNATIVE 3 — PROPOSED ACTION
Structure	Original 1811 walls left in place and historic fabric preserved and protected.	No change; continue existing preservation activities.	Continue existing preservation; ticketing pavilions would be removed.	Redesign and construction to provide for uses consistent with the Castle Garden era. New structure would contain multipurpose and adaptable stage and auditorium seating, visitor service facilities, and space for site administration and maintenance. Would be built to withstand flooding.
Ticket Sales	Improved operations.	Improved by providing stanchions and ropes.	Remove ticketing pavilions inside structure; provide ticketing at original ticket sales building, in kiosks moved outside structure, or in new structure in nearby Battery Park.	Ticket sales, inside or outside and nearby, would be accommodated and improved, perhaps by computerized ticket sales and reservations.
Area Information, Exhibits, Brochures, and Interpretation	Information on area sites; new bulletin cases and waysides with maps and ferry schedules; new or upgraded exhibits and updated brochures with multilingual information and accessible to those with visual and physical limitations.	Exhibits upgraded to interpret historical continuum; focus on role of Castle Clinton in evolution and growth of New York City and the nation. Increase in number of tours, but still limited by staff availability and physical congestion (due to ticket sales)	Add exhibits; emphasize fortification period. Use space provided by the removal of ticketing pavilions for visitor orientation area. Expand interpretive programs and provide summer concerts and plays, reenactments, and costumed interpretation.	Would permit fullest interpretation and entertainment potential. New exhibits and programs would convey entire history of the site; interactive exhibits would describe the history and growth of New York City; audiovisual presentation of history of site would be provided (accessible to hearing or visually impaired visitors). Full range of entertainment events in keeping with Castle Garden era would be provided, including national repertory companies, community organizations, local artists, etc. Options vary for managing the entertainment programs. Visitors would enjoy programs regardless of weather.
Collections	With site in 100-year floodplain, collection storage would continue at Federal Hall. Original articles not displayed permanently at the site.			
Site Security	Continue locking structure at night, when not in use, and nighttime patrols.			Security system would be enhanced.
Visitation		Existing visitation would continue.	The numbers of people at the site would probably decrease (because ticket sales would be removed); however, the number of people visiting the site for its significance could increase because of improved interpretation and exhibits.	The number of site visitors would probably increase. Interpretation and entertainment potential would be greatly enhanced.

	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2	Alternative 3 — Proposed Action
Restrooms		Upgraded but not expanded; Park Service would continue to work with city to improve condition and availability of restrooms in Battery Park.	Same as alternative 1	Expanded facilities in new structure.
Pest Management	Pest management efforts would continue.			
Boundary Adjustment		Not required.	Might be required.	Might be required.
Park Operations		Limited administrative office and maintenance and storage space would not change.	Same as alternative 1.	Partnership would be formed to administer site redevelopment. Various management options would be considered.
Staffing		8 full-time employees (as existing)	10 full-time employees	20 full-time employees
Annual Operating Costs		$468,000 (as existing)	$550,000	$1 million
Implementation Costs (including interpretation)		$1,050,000	$1,952,000 for development and refurbishing old ticketing facility or $2,440,000 + $_____ for development and building new structure for ticket sales (costs for new ticketing structure are unknown)	$18,085,000 for development and refurbishing old ticketing facility or $18,573,000 + $_____ for development and building new ticketing structure (costs for new ticketing structure are unknown)

TABLE 2. SUMMARY OF IMPACTS FOR CASTLE CLINTON

TOPIC	IMPACTS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2	ALTERNATIVE 3 — PROPOSED ACTION
Impacts on Cultural Resources	Walls of 1811 fortification would not be permanently affected.	No short- or long-term impacts.	If new building were constructed or kiosks were used for ticketing functions, impacts would be addressed in a future document. If old ticketing facility were used, a structural evaluation would be conducted and building would be rehabilitated if necessary.	Would significantly affect appearance of fortification structure because 1970s reconstruction would be removed. If ticket sales are relocated outside of structure, impacts would be addressed in a future document. If old ticketing facility were used, a structural evaluation would be conducted and building would be rehabilitated if necessary.
Impacts on Historic Structures		No impacts.	Relocation of ticket sales would help impede the deterioration of the site's historic resources and fabric due to the numbers of people.	Significant visual impacts of new construction on 1811 walls would be mitigated by a clear differentiation of materials and design and through the use of careful construction techniques.
Impacts on Museum Collections	Collection would continue to be stored at Federal Hall, which is being improved; expanded area would allow room for conservation work. No original artifacts would be used for permanent exhibits; temporary exhibits might be displayed by following floodplain guidelines. No new long-term impacts on the collection.			
Impacts on Ethnographic Resources	Unknown.			
Impacts on Historic Landscape / Viewshed		None.	Building a new ticketing facility could impact landscape/scene of Battery Park; impact would be mitigated by designing and locating the facility to be compatible with surroundings. No impact from renovating/upgrading old ticketing facility.	Same as alternative 2; also, with significant changes to the structure, viewshed would be altered.

Topic	Impacts Common to All Alternatives	Alternative 1 — No Action	Alternative 2	Alternative 3 — Proposed Action
Impacts on Archeological Resources		None.	Unlikely impacts within boundary. If new ticketing facility were constructed and archeological resources were discovered, although this is unlikely, proper procedures would mitigate possible impacts.	Same as alternative 2.
Impacts on Natural Resources		No short- or long-term impacts.	New ticketing facility could impact some natural resources, depending on facility location. Proper design, construction, and erosion control techniques would minimize these impacts.	New facility and substructure could impact some natural resources (especially soils); proper design and construction techniques would minimize these impacts. Directing proper drainage would help mitigate impacts on harbor waters.
Impacts on Floodplains		None.	If constructed, new ticketing facility would be in 100-year floodplain. Procedures for construction, protecting life, and minimizing storm damage would mitigate impacts.	Same as alternative 2, plus roof design on new structure would be designed to withstand storm damage.
Impacts on Threatened or Endangered Species		None.	With mitigation, no significant short- or long-term impacts on peregrines.	Same as alternative 2.
Impacts on Coastal Zone Management	With required concurrence, no impacts.			
Impacts on Regional Land Uses and Visitor Facilities		No impacts.	Loss of park land for new ticketing facility (if built) and ticket lines would be detrimental to other park users and community. There would be short-term impacts from construction activities. Moving ticketing would be a positive impact for Heritage Trails New York and visitor experience because of better interpretive opportunities.	Same as alternative 2. Also, new facility would draw more visitors into Battery Park and encourage development of existing and proposed uses.

Topic	Impacts Common to All Alternatives	Alternative 1 — No Action	Alternative 2	Alternative 3 — Proposed Action
Impacts on Socioeconomic Environment		No new impacts.	If the construction contract for the ticketing facility was awarded locally, some short-term jobs or benefits would occur. Vendors would benefit from increased numbers of visitors.	New entertainment options and exhibits would provide social and cultural activities for community and park visitors. Artists would have a place to perform. Nearby businesses could benefit from increase in visitors. Some short-term jobs might be created for local businesses and workers. Added demands on water and sewer lines would require increase in capacity.
Impacts on Visitor Use and Interpretation		Little change; ropes and stanchions would improve some congestion. Tours and programs would continue to be limited by staff availability and congestion. Updated exhibits would enhance visitor experience; themes would be minimally interpreted. Restrooms would still be crowded.	Quality of visitor experience would be greatly enhanced. Numbers of people at the site would decrease (due to moving ticket sales outside the structure). Number of site visitors might increase with new exhibits, enhanced interpretation, and events.	Quality of visitor experience, with improved interpretive programs and media and cultural programs and in-depth coverage of themes, and visitation levels would be higher than in other alternatives. Weather would not affect site use. Ticket lines and congestion would decrease.
Impacts on Transportation	Limited parking spaces and traffic congestion would continue.			
Impacts on Cooperators	None.			
Impacts on NPS Operations		Numbers of visitors would continue to impact staff ability to interpret; restrooms would continue to be overworked and in need of repairs.	Less staff time would be required for crowd control and maintenance/repair.	Less staff time would be spent on crowd control. More space and use that would not be affected by the weather would be available for park operations. More funds would be required for staff and operations.

Topic	Impacts Common to All Alternatives	Alternative 1 — No Action	Alternative 2	Alternative 3 — Proposed Action
Cumulative Impacts		Local artists and vendors would continue to benefit from visitors coming to Battery Park to buy tickets. NPS and Circle Line operations would remain unaffected. Heritage Trails New York would continue use of Castle Clinton, but interpretive potential would continue to be negatively impacted by crowds.	National Park Service and Heritage Trail New York would have expanded areas to use for interpretive and educational purposes. Vendors and street performers would not be impacted. The Statue of Liberty and Ellis Island might have a more active role in ticket sales after removal from Castle Clinton. Necessary transfer of land for ticketing facility to National Park Service, with land transfers recommended at other Manhattan Sites, would result in a larger loss of city-owned land base than just one proposed land transfer. However, transfers would be beneficial for city finances (lack of maintenance costs).	Combined with Pier A project, new entertainment, education, and recreation options, could meet needs of local residents and attract many visitors to Battery Park — more than if only one or the other facility was built; local businesses and city would benefit. Simultaneous events at both facilities could cause overcrowding and traffic and parking problems, as well as stressing water and sewer lines (if adequate capacity is not provided for both projects) and police staff and budget (for added patrols). Along with Pier A, new structure would provide cultural center for residents and visitors and possibly an economic benefit for vendors and performers. Impacts of necessary transfer of land for ticketing facility to National Park Service, with land transfers recommended at other Manhattan Sites, would be the same as alternative 2.
Unavoidable Adverse Impacts / Relationship between Short-term Uses and Long-term Productivity / and Irreversible and Irretrievable Commitment of Resources		None.	Irretrievable loss of already limited park land and perhaps natural resources in area; mitigated by careful siting of new facility. Unlikely irreversible and irretrievable impacts on archeological resources, which would be mitigated by survey and monitoring.	Physical changes to structure (the roof in particular) and character and views of and from the area could be considered irretrievable and irreversible. Restoration efforts of the 1970s would be lost. Development of new entertainment options and interpretive exhibits would provide social and cultural activities for area residents and businesses and other park visitors. Artists and other groups would have a facility in which to perform. There could be potential benefits for the lower Manhattan businesses. If the ticketing facility was relocated outside of the structure, impacts would be as described in alternative 2.

CULTURAL RESOURCES

Brief History of the Site and Structure

The West Battery was built as part of the New York Harbor defense system to defend New York City as tensions between France, Great Britain, and the United States grew following the Revolutionary War. Construction lasted from 1808 to 1811, and at that time the structure was an island about 200 feet off the tip of Manhattan. During the War of 1812 the battery was garrisoned, but no battles were fought there. In 1815 the West Battery was renamed Castle Clinton in honor of New York governor DeWitt Clinton, and from 1816-20, Castle Clinton served as the army's Third Military District headquarters. Some modifications were made to the structure during these years.

Castle Clinton's military importance diminished over the years with the construction of other forts in the harbor with improved weaponry. In 1823 the War Department relinquished the fortress to the city of New York. A complete renovation transformed the structure into Castle Garden, an entertainment facility featuring a restaurant and formal garden with exotic botanical specimens. A causeway was constructed to replace the walkway used by the Army.

In 1844 Castle Garden was converted into an opera house and theater. A roof was built over the walls, and seating for more than 10,000 people was installed. Four years later, the causeway was removed and the island was joined to Manhattan with landfill. Castle Garden evolved into one of the cultural centers of the nation. Presidents and dignitaries were received here. It became the first home of the New York Philharmonic Orchestra. Samuel Morse introduced the telegraph here, and P.T. Barnum entertained crowds with circus extravaganzas and history displays. In 1850 Jenny Lind, the Swedish Nightingale, made her American debut in Castle Garden. For 32 years Castle Garden served as one of America's great entertainment centers.

Castle Garden's lease expired in 1854, and in the following year the New York Board of Commissioners of Emigration began operating Castle Garden. The board immediately transformed the structure into an immigration facility that became the first official receiving center for immigrants into the United States. When Ellis Island became the new processing center in 1890, use of the former fortress for this purpose ceased. In its 35 years as a processing center, more than 8 million immigrants had become Americans at the facility.

In 1891 the City Parks Department assumed ownership of the then-former immigration center. In 1896 the architectural firm of McKim, Mead & White renovated the structure for the creation of the New York Aquarium. Landfill was used to surround the structure. One of the first in the country, the aquarium evolved into one of the largest in the world. The exhibits of marine mammals and exotic sea creatures attracted hundreds of thousands of visitors each year.

In 1941 the aquarium closed and the building was threatened with demolition for the construction of the Brooklyn-Battery Tunnel. This plan roused citizens and preservation groups to save the structure; the ensuing battle was perhaps the most hard-fought preservation battle of the 1940s. During World War II, the demolition plan was postponed, leaving the structure intact. By 1946, however, demolition had begun on the aquarium portions of the fortress and the preservation battle continued to rage. Success for the preservationists came on August 12, 1946, when Castle Clinton became a national monument (60 Stat. 997). It was listed on the National Register of Historic Places on October 15, 1966, with historical documentation following on December 18, 1984.

Twenty-five years after the fortress was saved from demolition, the National Park Service restored the site to its early 19th-century appearance as a battery. In 1985–86, modifications were made to enable the sale of tickets for the ferry to the Statue of Liberty and Ellis Island (through the Liberty/Ellis Island Foundation, Inc.).

Architectural Description and Development

The West Battery was constructed in an almost-circular plan, 184 feet in interior diameter. A segment of a circle, greater than a semicircle, fronts the water, and the segment fronting the battery is rounded off and finished with a straight line. Walls rise 20 feet, are 8 feet thick (the straight wall is 6 feet thick), and are constructed of sandstone blocks (quarried near Newark, New Jersey) with a rubble fill. Brick relieving arches are above embrasures within the structure, behind exterior-facing stone. The fortress was built on a man-made island of stone and fill. Exterior stone blocks are the only visible materials remaining from the original structure.

Piercing the wall are 28 open embrasures, 4 false embrasures, and several narrow ventilation slits. The open embrasures, set in pairs for each casemate, are keyhole-angled. The sally port, in the center of the battery-fronting straight wall, consists of a large portal with paired double pilasters of rusticated ashlar capped by a simple entablature. The false embrasures are on either side of the sally port.

A wood shake roof covers the perimeter of the building and extends out over the interior space, supported by 13 circular brick columns. A sandstone veneer faces the interior wall. The large wooden doors of the sally port and those of the west entrance replicate early 19th century models. There are iron grills within the embrasures. Several small rooms, built into the former magazines and interior wall, are used for administrative offices, maintenance storage, toilets, and a museum exhibit. The two small pavilions in the confines of the fortress are used for ticketing operations and book sales. Two circular platforms are also situated within the fortress and represent the former cisterns. The interior is paved with concrete.

The design of the battery is generally attributed to the Army's Chief Engineer Col. Jonathan Williams. Williams was also responsible for the three-tiered Castle Williams on Governor's Island, for which the West Battery was meant to be a companion defense structure. The two fortresses are similar in appearance, although the West Battery never rose above its first tier of gun emplacements. The design of the sally port is attributed to John McComb, Jr., a prominent New York City architect. Documents indicate that construction of the fortress was supervised at times by Major Joseph G. Totten and Captain George Bomford.

The many alterations to Castle Clinton over the years have modified original materials, interior plan, and surrounding landscape. Perhaps the most visible reminder of a former modification is the pattern of gouges in exterior stone faces — made for the application of a cementitious render for the aquarium. The render was all but removed during the NPS restoration; some bits and pieces still remain. Original interior features (magazines, officer's quarters, hot-shot furnace, gun platforms, and cisterns) were all but destroyed by the time the fortress came under NPS jurisdiction.

The 1975 restoration began by rebuilding the sally port and casemate roof. Officers quarters, privies, magazines, and embrasures were reconstructed. A second entrance was opened in the wall, opposite the sally port. Embrasures were outfitted with iron grills. Sandstone blocks were also applied as a veneer to the interior wall. The interior was paved with concrete, and electrical and mechanical systems were installed. By the Bicentennial celebration, Castle Clinton was reconstructed to reflect its 1811 appearance.

In 1986, as part of the Statue of Liberty and Ellis Island restoration, Castle Clinton was renovated to accommodate the sale of ferry tickets to the two islands. Ticketing kiosks were built inside the fort. Several structural improvements were also carried out and the toilets were improved. In the years since, maintenance projects have been carried out by the National Park Service.

Battery Park

Battery Park is one of approximately 1,500 parks, playgrounds, and other public spaces under the jurisdiction of the City of New York's Department of Parks and Recreation. The tear-shaped park covers 22.98 acres of land that stretches between State Street, Battery Place, and the New York Harbor. Designed as part of the City Beautiful movement during the 1910s, Battery Park consists of planned landscaping and an esplanade along the waterfront.

Winding pathways with wooden benches divide the park into spaces of flat grassy areas dotted by shade trees, picnic areas with tables, and small enclosures that protect various monuments. A black iron fence outlines the park's perimeters and subareas. Many informal paths throughout the park have been created by park users. The largest section of lawn, the great lawn, is circumscribed by trees and fenced off; park users are not permitted in this area.

The principal entrance to the park is at the intersection of State Street and Battery Place, by a subway station. East of this entrance is a city tour bus stop and a taxicab line. West of the entrance is an area for other tour buses to deposit and collect tourists.

Eisenhower Mall is a tree-lined walkway bordering the Hope Garden, which links the park's main entrance with Castle Clinton. The surrounding paths are lined with benches. West of Eisenhower Mall is a restroom facility. The other entrance into Castle Clinton is on the south side off of the Admiral Dewey Promenade. Both Eisenhower Mall and the promenade are lined with pushcart vendors. The Admiral Dewey Promenade is a curved esplanade that connects Castle Clinton to the harbor and outlines the southern edge of the park. It extends to the west side of Battery Park to Pier A to an old firehouse. This section is less frequented by visitors despite the recent installation of a new memorial commemorating the Korean War. Along the eastern edge of the promenade is a war memorial plaza, an outdoor restaurant, and boat docks in the harbor. Between Castle Clinton and the east end of Battery Park are the ferry landings and various harbor pier posts. This part of the park is elevated above the promenade and is lined with binocular stations and benches.

In the northeast section of the park, in the corner of the enclosed playground, there is a restroom and a city workers' changing room. The northwest corner of the playground has an entrance that is locked but is often used without permission. Beyond the playground and across the street are concession stands, vendors, the subway line, and the entrance to the Staten Island Ferry.

Museum Collections

The museum collection, containing NPS records, historical photographs, immigration materials, archeological materials, and historical artifacts, is stored at Federal Hall National Memorial.

Adjacent National Register Sites

The following historic sites, all listed on the National Register of Historic Places, are close to Castle Clinton. Battery Park Control House, one of the last remaining kiosks of the city's first subway system, is on the northeast corner of Battery Park. Bowling Green Park and Fence, a rare survivor of pre-Revolutionary craftsmanship, was erected in 1771 to enclose New York's first

park. This park is just northeast of the Battery Park boundary at State Street and Broadway. The United States Customs House completed in 1907, which is now home to the Smithsonian National Museum of the american Indian, is across from Battery Park. Pier A, which juts into New York Harbor and is the last survivor of a maritime complex on the site, is adjacent to Castle Clinton. Built in 1884–86 for the city's Department of Docks and Harbor Police, Pier A now serves as the headquarters for the Fire Department's Marine Division.

Ethnographic Resources

Ethnographic resources at Castle Clinton are unknown. Until the potential existence of these resources is determined, the park would continue to recognize and maintain relationships that are based on respect for differing lifestyles, ethnic preferences, cultural diversity, and social groupings.

In 1994 a rapid ethnographic assessment report was conducted for a project at the Statue of Liberty/Ellis Island. Within this report, Battery Park was evaluated. It was found that park users are nationally and internationally diverse visitors and workers. Visitors to the park include tourists, the Wall Street lunch crowd, and New York and New Jersey residents who have come specifically to enjoy the park. Park users engage in activities such as walking, shopping at the vendors, biking, in-line skating, and fishing.

Tourists can be found throughout the park, although most are near the ferry landing, souvenir pushcart area, and the tour bus area. Streams of tourists exiting the ferry generally follow the wide pathway connecting the promenade to the great lawn area, where they rest, eat, walk, and shop. Other visitors use different areas of the park. Local workers on their lunch break tend to use Eisenhower Mall around the great lawn and the picnic areas. Fishermen gather at the end of the harbor, and bikers and in-line skaters use the length of the promenade. Vendors use many different areas of the park. Two days a week there are large flea markets along State Street and Bowling Green. Most vendors who participate in these markets are immigrants.

Street performers work on the promenade where the boat lines are formed, between Castle Clinton and the promenade, and also along the wide path and crossroad to the great lawn. The types of performances include acrobatic tumbling, pantomime, and instrumental performances.

Although homeless people reside throughout Battery Park, frequent overnight use of the eastern part of the park occurs. The stone slabs of the war memorial offer privacy for sleeping, and there are bathrooms and a running water fountain. Also, a social services center is near this section of the park, underneath the Staten Island Ferry terminal.

Several different authorities serve Battery Park. NPS employees are at Castle Clinton, and city park employees maintain Battery Park. A police car patrols the park for security. Circle Line employees work throughout the park, including the ticketing area at Castle Clinton and the docks for the ferry. Ticket takers along the promenade are Circle Line employees.

NATURAL RESOURCES

The climate, water resources, wetlands, soils, and air quality resources are the same as the general natural resource characteristics for the Manhattan Sites, which were previously discussed.

Vegetation

There is no natural vegetation at Castle Clinton National Monument; the park boundary only extends a few feet from the castle walls, within a paved area. The species in Battery Park are a product of past

landscaping activities. Due to its urban environment, numerous nonnative, invasive species are present in Battery Park including those used for landscaping purposes.

Wildlife

The wildlife species at Castle Clinton are representative of those inhabiting an urban environment. They depend on small rodents and insects and sometimes human interactions (and refuse containers) for food and shelter. Small mammal species that have been documented onsite include the eastern gray squirrel *(genera citellus)*, house mouse *(Mus musculus)*, and the Norway rat *(Rattus norvegicus)*. Avian species are typical of an urban setting and include pigeons, English sparrows, and sea gulls. Numerous insects are present, including silverfish, termites, cockroaches, spiders, and beetles.

Floodplains

The site is within zone B, which is an area between the limits of the 100- and 500-year flood. The area of flooding is protected by levees from the predicted base flood. The area southwest of the castle, zoned V7, is an area where the base flood elevations and flood hazards have been determined for the 100-year flood. In addition, the area is subject to the 100-year coastal flood with velocity wave action predicted.

The castle is about 400 feet from the water's edge, where the 100-year flooding potential and coastal flood with velocity waves are predicted to reach 12 feet above mean sea level. The base elevation for the site is 11 feet above mean sea level. The applicable flood insurance rate map for the site is for the City of New York, New York; Bronx, Richmond, New York, Queens, and Kings Counties, Panel 54 of 131, Community Panel Number 360497 0054 B, effective date November 16, 1983.

Threatened and Endangered Species

Consultation with the U.S. Fish and Wildlife Service office in New York and the Significant Habitat Unit of the New York Department of Environmental Conservation revealed that the peregrine falcon *(Falco peregrinus)* is listed on state and federal lists as an endangered species and is known to breed and use habitat near Castle Clinton (see appendix D). The open grassy field of Battery Park is suspected of providing some of the food sources for their dietary needs. The hunting radius averages between 2 to 3 miles from their nesting site according to information obtained from the city Department of the Environment.

According to the New York Natural Heritage Program, the peregrine falcon has heritage global and state rank of G3 and S2, respectively. The G3 rank, which reflects the falcon's rarity throughout the world, indicates it is either (1) very rare and local throughout its range, (2) that it is found locally in a restricted range, or (3) that it is vulnerable to extinction throughout its range because of other factors. The S2 state rating means that the species (1) is limited typically to 6 to 20 occurrences, (2) has few remaining individuals, or (3) that there are factors that make it very vulnerable.

Staff of the natural resources unit of the city's Department of Environmental Conservation are actively involved in the perpetuation and management of peregrine falcons in the city.

SOCIOECONOMIC ENVIRONMENT

General Characteristics

Castle Clinton is in Community District 1 at the southern tip of Manhattan. This area includes the Wall Street financial district, Tribeca, and well-known tourist attractions, such as the Statue of Liberty, the World Trade Center, and the South Street Seaport Museum. The district's residential

population increased almost 60% during the 1980s, largely due to the construction of new high-rise housing on a site adjacent to Battery Park. Gentrification and an influx of "young, urban professionals" are indicated by income and household composition; households headed by individuals between 25 and 45 years old report the highest incomes and make up most resident households. Overall, residents exhibit very high levels of educational attainment and fall into the middle and upper income levels, with a correspondingly low level of poverty.

The district supports a residential population of 25,277, with a median household income of $47,445 (1989 constant dollars) and per capita income of $37,228. Most households rent rather than own their apartments or condominiums, and they pay a median gross rent of $935 per month. With the development of housing such as Battery Park City near Castle Clinton, the number of housing units and associated residents has increased 82% and 59%, respectively, since 1980. Because of this new development, district 1 has changed from a 9 to 5 workplace to a dynamic, seven days per week residential and business community that also has numerous tourist attractions.

Residents of Community District 1 are of predominantly of European ancestry, with the major groups being German (14%), Irish (11.9%), and Italian (11.9%). Reported groups with African or Hispanic ancestry each number less than 1%. The 1990 percentage of foreign-born residents was 20.7, which represents an increase of 120.5% over 1980 figures; half of these were recent immigrants. Nearly 27% of residents speak a language other than English in the home; 44% of these speak an Asian or Pacific Islander language.

Local Issues

Some of the concerns that the community board reports in the area, and that affect the National Park Service as well, include a lack of parks and active recreation space, a lack of adequate security and police protection, and transportation and parking problems. The growing residential community has created the need for additional recreational open space and put increasing pressure on existing parks, such as Battery Park. Renovation of Battery Park had been planned; however, the current city budget has prevented any substantial renovations. In 1994 the Conservancy for Historic Battery Park was established as a private nonprofit organization dedicated to restoring and maintaining the Battery Park as a multiuse open space. Working in cooperation with the New York City Department of Parks and Recreation, civic organizations such as the Alliance for Downtown New York, and other city, state, and federal agencies including the National Park Service, the conservancy is developing strategies to restore Battery Park as a focal point for both lower Manhattan and the city's Harbor Park — a component of the New York State Heritage Areas system.

Traffic congestion throughout the district is an ever-increasing problem; the street grid in lower Manhattan dates back to the 1700s and early 1800s and was not designed to handle present-day traffic. Suggested solutions include providing additional traffic agents to prevent gridlock, aggressively ticketing illegally parked vehicles, and creating a bus terminal with bus storage facilities at the current Battery parking garage. Such a facility would enable visitors to access attractions in lower Manhattan and help prevent the traffic pollution, congestion, and pedestrian hazards currently occurring in the streets.

CARRYING CAPACITY

The carrying capacity is influenced by the site's resources, staff, and egress (fire code). At Castle Clinton the ticketing for Statue of Liberty/Ellis Island comprises most of the visitation, which fluctuates depending on the ticket sales. The capacity of the site is 400 persons, which is at the limit on heavy ticket

sales days and is based on safety regulations and preservation of the resources.

NPS OPERATIONS

Current operating costs at Castle Clinton are about $468,000, with a staff of eight full-time employees.

TRANSPORTATION

Castle Clinton is accessible by bus and subway systems that serve New York City. Bus service to the park is provided via the M1 (weekdays only), M6, and M15 lines. The M1 and M15 bus routes serve the east side of Manhattan. No direct bus service is available from the west side, but transfers are available from west-side service to the M1, M6, and M15 lines. Subway service is available from the South Ferry station under Battery Park via the no. 1 and no. 9 trains. The no. 4 and no. 5 trains stop at the Bowling Green station at the intersection of Battery Place and State Street. Castle Clinton is within convenient walking distance from the South Ferry, the landing place for ferries from Staten Island, Governors Island, and the Statue of Liberty.

Onstreet and offstreet parking is available next to Battery Park. Over 2,900 spaces are available. Generally, parking is easier to find on weekends than weekdays; however, because visitors access Statue of Liberty and Ellis Island from Battery Park, parking lots fill up by midday even on weekends. Onstreet metered parking is in short supply, and time restrictions make metered parking for Castle Clinton visitors appropriate only for those who will stay a short time.

REGIONAL LAND USE AND VISITOR FACILITIES

Battery Park

Physical Setting. Castle Clinton is an integral part of the 23-acre Battery Park. The park was developed by a series of landfilling operations that gradually extended the shoreline southwest from State Street over a period of 300 years. Battery Park is urban in nature, bordered on the north by Battery Place and on the east by State Street.

Significant features in Battery Park include the Eisenhower Mall and the Admiral George Dewey Promenade. The park also contains 24 historic site markers and statues (including a new Korean War memorial), two comfort stations, a playground, and several other permanent structures.

The Conservancy for Historic Battery Park has embarked on an ambitious program of physical and programmatic improvements to the Battery Park. Using various public and private funding sources, the conservancy is upgrading park plantings and vendor booths, improving visitor information signs, enhancing park entrances, providing for better maintenance, and sponsoring day and evening activities in the park.

Park Users. Visitors to Battery Park include tourists, nearby residents from Battery Park and other parts of lower Manhattan, and workers from the nearby Wall Street financial district. Users engage in such activities as walking, shopping, biking, in-line skating, fishing, resting, sunbathing, and sightseeing. Many vendor pushcarts and street performers provide goods to and entertain park users, particularly visitors waiting for the ferries along the promenade.

Many homeless people reside in the park, particularly the eastern section. A service center for homeless individuals is under the Staten Island Ferry terminal, and a soup kitchen is available in the adjacent neighborhood.

Administration. The park is under the jurisdiction of the New York City Parks and Recreation Department. However, the presence of NPS rangers and city police are regularly noted in the park. NPS rangers are generally inside or at the door of Castle Clinton directing tourists or giving tours. Police cars patrol the park day and night.

Pier A

Adjacent to Castle Clinton and still in Battery Park is Pier A. The pier is a city-designated landmark and is also listed on the National Register of Historic Places. The building on the pier, currently used by the New York City Fire Department for its Marine Division headquarters, the marine repair shop, and a marine fire company, needs renovation. The city's department of Parks and Recreation has developed plans to renovate Pier A in conjunction with the state and other local and federal agencies. The renovation will include a visitor center, restrooms, and shops for visitors and residents. The visitor center will present information on 15 or 20 different federal sites (including national park system sites), state, local, and private parks or developments along the harbor, and other locations such as Staten Island.

NPS representatives have been involved in an advisory capacity in planning for the pier. The renovation could help alleviate current problems with the distribution of information regarding the Manhattan Sites and the lack of adequate restroom facilities at Castle Clinton and in Battery Park.

Heritage Trails New York

Heritage Trails New York is a composite of four walking tours in lower Manhattan. The purposes of the trail system are to help increase public awareness of the wonders of Wall Street and its surrounding environment and highlight the historical events and places related to the development of our nation. Beginning at Federal Hall, one of these trails takes visitors south to Battery Park and Castle Clinton. These heritage trails are being sponsored by major institutions, organizations, governments, and individuals in downtown Manhattan.

COOPERATORS

The National Park Service would continue to seek out opportunities to develop partnerships with organizations that share common goals related to historic preservation, natural resource protection, education, and recreation. Where useful or appropriate, ongoing informal partnerships with organizations such as the Conservancy for Historic Battery Park, the Alliance for Downtown New York, the Lower Manhattan Cultural Council, and Harbor Park may be formalized through memoranda of understanding to define respective roles and responsibilities more precisely.

VISITOR USE AND INTERPRETATION

Visitors come to Castle Clinton primarily to purchase tickets for the ferry ride to the Statue of Liberty and Ellis Island. The average stay of a visitor generally depends on the length of the line waiting to purchase tickets. There is a direct conflict of visitor access between individuals using the Ellis Island/Circle Line ticketing facility in the structure and those visiting Castle Clinton for its history and interpretation. The crowded space often imposes on visitors who wish to see the exhibits and structure. Although guided tours of the fort are offered, the staff is often used for crowd control during heavy ticket sales. Interpretive displays for all the Manhattan Sites are around the inside of the structure. A small museum area contains dioramas and historical views depicting the evolution of Castle Clinton and lower Manhattan from 1801 to 1940. Special events include musical performances and similar cultural activities. Limited restroom facilities are available.

Annual use at Castle Clinton averages about 3 million visitors per year, most of which is attributable to Statue of Liberty/Ellis Island ferry ticket sales. Special events in Battery Park have also attracted as many as 21,000 visitors on a peak day. The site had been closed to the public from mid-December through mid-March from 1981–86. However, it has functioned as a daily, year-round mainland orientation center/ferry embarkation station for the Statue of Liberty and Ellis Island since 1986. Saturdays and Sundays tend to be the heaviest visitation days, particularly during the summer. Crowds throughout the summer months have averaged between 14,000 and 21,000 visitors daily since ticket sales were introduced in the structure.

In March through Memorial Day, there are minimal lines at the ticketing pavilions inside Castle Clinton, with a maximum wait of 15-20 minutes for tickets. The waiting period to board a tour boat from the Battery Park Esplanade averages 30 minutes. The weekend days during this time show a slight increase in waiting periods, with a 15-20 minute wait for tickets and an average of 30-60 minutes to board the tour boat. The summer months (Memorial Day through Labor Day) show an increase in visitation and a longer wait in ticketing and boat boarding lines. On weekends, there is an average 35-minute wait to purchase tickets and up to a 60-minute wait for boats. On extraordinary holidays and weekends, such as Memorial Day, July 4th, the day after Thanksgiving, and Christmas week, the lines to purchase tickets average a 45-minute wait and the boat lines average a 90-minute wait. During these lengthy waits, the interior of Castle Clinton becomes extremely crowded, with the lines extending out the door and wrapping around the perimeter of the structure. This is a hardship during inclement weather and hot days. It also intrudes on visitors wanting to tour the site.

TABLE 3. CASTLE CLINTON, VISITATION

Year	Visits/Year
1980	165,584
1981	113,741
1982	96,859
1983	124,823
1984	90,284
1985	128,678
1986	2,215,811
1987	3,042,819
1988	2,822,695
1989	3,337,330
1990	3,385,205
1991	3,442,551
1992	3,350,062
1993	3,323,055
1994	3,487,789

NOTE: Visitation is counted by park ranger or volunteer with counting device at site entrance. For special events, the number of people that fill one area is multiplied by the number of areas that are the same size and also filled with people.

IMPACTS COMMON TO ALL ALTERNATIVES

Impacts on Cultural Resources

The 1811 fort walls would not be permanently affected.

Impacts on Museum Collections. Under all alternatives the artifacts and archival collection of Castle Clinton would remain in storage at Federal Hall National Memorial The protection/safety and preservation of stored artifacts would be enhanced by their relocation on the third floor of Federal Hall, which is being improved. The expanded area would also allow room for conservation work.

Because Castle Clinton is within the 100-year floodplain, no original artifacts would be used for permanent exhibits. However, if a temporary exhibit displayed any original artifacts, guidelines for 100-year floodplain would be followed. There would be no long-term impacts on the collections.

Impacts on Ethnographic Resources. An ethnographic study would be needed to determine if any ethnographic resources exist at the site, the contemporary groups associated with them, and whether they would be impacted by actions under these alternatives.

Impacts on Natural Resources

Impacts on Coastal Zone Management. With required concurrence with New York's coastal zone management program, there would be no impacts on coastal zone management.

Impacts on Transportation

Under all alternatives, limited parking opportunities and traffic congestion would continue.

Impacts on Cooperators

Because there are no cooperators formally associated with Castle Clinton, there would not be any associated impacts.

ALTERNATIVE 1

Impacts on Cultural Resources

There would be no short- or long-term impacts on the cultural resources associated with the actions proposed in alternative 1. Implementing this alternative would constitute a continuation of existing trends with little or no change in physical structure or values.

Impacts on Historic Structures. Because this alternative calls for the continuation of existing trends, there would be no impact on the historical materials, the original walls of the 1811 fortification. The national register qualities of this structure would not be affected, and neither would the components of the 1970s restoration of the fortification period.

Impacts on Historic Landscape / Viewshed. Because there would be no structural changes and only modest physical adjustments to the castle interior under this alternative, the landscape and setting of the castle and Battery Park would not be affected. Nearby historic structures — Pier A, Bowling Green Fence and Park, the Battery Park Control House, and the U.S. Customs House — would not be impacted visually (or structurally) under this alternative.

Impacts on Archeological Resources. With no ground-disturbing activities, there would not be any impacts on any archeological sites or resources within the boundaries of Castle Clinton or in Battery Park.

Impacts on Natural Resources

There would be no perceived short- or long-term impacts on the natural resources associated with the actions proposed in alternative 1. Implementation of this alternative would constitute a continuation of existing trends with little or no change in physical structures, impact zones, or natural resource values.

Impacts on Floodplains. Castle Clinton is in the floodplain, about 400 feet from water's edge. Actions proposed by this alternative have been excepted from Executive Order 11988, "Floodplain Management," because "this guideline does not apply to historic or archeological structures, sites, or artifacts whose location is integral to their significance." Because no new development is proposed and materials on display are not considered original or archival, this exception is applicable. Conforming with the spirit of that executive order, however, the park staff would cooperate with New York City and state agencies to develop and annually update the evacuation plan for park visitors to ensure their safety from potential storms.

Impacts on Threatened or Endangered Species. No species listed as endangered or threatened or habitat considered critical by the U.S. Fish and Wildlife Service or the Significant Habitat Unit of New York Department of Environmental Conservation would be affected. Because no new development is proposed under this alternative, there would not be any new impacts on the peregrine falcon, a federal- and state-listed endangered species that has been observed in the vicinity of Castle Clinton.

Impacts on Regional Land Uses and Visitor Facilities

Castle Clinton's relationship to external land uses and facilities would not change under this alternative. Improvements in Battery Park would continue with funding from outside sources such as the Battery Park Conservancy. In addition, the castle would continue to be a destination on the Heritage Trails New York tour.

Impacts on Socioeconomic Environment

No additional impacts on local community characteristics or the economy would occur under this alternative.

Impacts on Visitor Use and Interpretation

Little change would occur relative to visitor use. The site would continue to function primarily as a ticketing facility for the Statue of Liberty and Ellis Island, which would retain the sites' visitation numbers. Stanchions and ropes would provide a more controlled system for ticket lines, which should alleviate some of the site congestion. However, interpretive tours and special programs would continue to be limited by some physical congestion and staff availability. The updated exhibits would enhance the visitor experience, although ticket sales congestion might impede visitors from touring the fort at certain times. The interpretive themes would be minimally interpreted.

The unchanged restroom facilities would continue to be overcrowded when many visitors are at the fort.

Impacts on NPS Operations

Because the staff level would not increase under this alternative, the numbers of visitors would continue to adversely impact the staff and their ability to perform other site functions, such as interpretation.

Furthermore, without additional restroom facilities, the existing facilities would continue to be overworked and require constant maintenance attention.

Cumulative Impacts

Because this alternative would continue the use of Castle Clinton as a ticketing facility, the street vendors and performing artists would continue to benefit from the many visitors coming to buy Statue of Liberty–Ellis Island tickets. The operations of the Statue of Liberty and Ellis Island units of the National Park Service, as well as the Circle Line/ Statue of Liberty Ferry, Inc., would not be impacted. Castle Clinton would continue to be a site on the Heritage Trails New York, but the interpretive potential would continue to be negatively impacted due to the overcrowding.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

There would be no known unavoidable / short-term long-term / or irreversible and irretrievable commitments of resources associated with actions proposed for alternative 1.

ALTERNATIVE 2

Impacts on Cultural Resources

If a new building were constructed or the kiosks (outside the fort) were used for ticketing activities, the associated actions would be evaluated to determine if and what additional section 106 and National Environmental Policy Act compliance would be required, and then appropriate state and local permits would be obtained. Potential impacts on cultural resources, natural resources, socioeconomic concerns, regional land uses, and other visitor facilities, associated with either action, would be assessed. If the old ticketing facility in Battery Park were used, a structural evaluation would be conducted and, if necessary, the building would be rehabilitated.

Impacts on Historic Structures. Although this alternative calls for the relocation of ticket sales and the removal of the 1986 ticket kiosks from the interior of the structure, there would be no impact on the original fortification walls, national register qualities of this structure, or the 1970s restoration of the fortification period. Removing the ticketing sales would result in a loss of visitors, which would help to impede the deterioration of the site's historic resources and fabric due to large numbers of people.

Impacts on Historic Landscape / Viewshed. Although Battery Park is not listed on the national register, under this alternative, the construction of a new ticketing facility could have a negative impact on the park landscape depending on the location of the structure. This impact would be mitigated by designing and locating the ticketing facility to be compatible with the surrounding environment. Construction activities could also have a short-term impact on the landscape. If the former ticketing facility is used, steps to renovate and upgrade the facility would occur. Because this building already exists, there would be no additional impacts on the landscape.

Impacts on Archeological Resources. Because this alternative would not require any ground-disturbing activities within the boundaries of Castle Clinton, the possibility of impacting any archeological resources within the boundaries would be unlikely. Battery Park, surrounding Castle Clinton, is also on landfill, and the potential for deriving information pertaining to Castle Clinton is remote.

However, if a new ticketing facility was constructed and archeological resources were discovered, proper procedures would be applied to mitigate any possible impacts on those resources.

Impacts on Natural Resources

Impacts on natural resources associated with the actions of this alternative would be concentrated at the area where a new ticketing facility would be constructed. This could include the conversion of an open, grassy, landscaped area on lands currently not administered by the National Park Service (probably less than 1 acre). Depending on the location of the facility, some nonnative grasses could be converted to a built environment. Wildlife species composition would not be expected to change; however, there would be short-term small mammal species displacement during construction and a long-term reduction of available open space habitat within this urban environment. Soils would be directly impacted by grading and placement of the structure's foundation. The building would create an impermeable area and would alter surface flow of overland waters during intense rainstorms and the area available for recharge of groundwater through infiltration.

Construction activities would be expected to cause short-term air quality impacts as a result of fugitive dust and diesel emissions from construction equipment. Any associated temporary emissions from the construction equipment would be less than the conformity de minimis levels established for carbon monoxide and ozone within the region in accordance with the Clean Air Act. There would be no long-term impacts on the air quality of the park or region as a result of activities proposed by this alternative. The short-term air quality impacts would be mitigated by monitoring fugitive dust during all grading and construction phases and using appropriate watering techniques. Construction equipment would be properly maintained and serviced to minimize exhaust emissions.

Mitigation would also include preserving primary natural resources, such as trees and shrubbery, on site. Siting constraints for the new ticketing facility would be implemented to ensure that these resources would not be disturbed either through design, building placement, or construction activities.

Erosion control measures, such as silt fences, would be required during construction to reduce erosion and prevent sedimentation of the adjacent coastal waters. Drainage from the site or the structure would not directly enter the bay, and the site design would include retention basins to collect surface or roof runoff. Stormwater would percolate into the ground and recharge the freshwater lens without discharging directly into the harbor.

Impacts on Floodplains. The construction of a new ticketing facility would occur within the floodplain and within an area designated by the Federal Emergency Management Agency as an area with 100-year coastal flooding and velocity wave action predicted during major storms. Because of its coastal location, there are no options for placing this facility outside of the floodprone area.

Any new structures or rehabilitation of existing structures in the floodplain and high hazard areas would be required to incorporate methods for protecting life and minimizing storm damage. Floodproofing would be an important design criterion, and any structure would be required to be elevated above or to withstand the predicted 12-foot tidal surge above mean sea level storm velocity wave. The park staff would cooperate with city and state agencies to develop and annually update the hurricane and storm evacuation plan for the site.

In compliance with Executive Order 11988, "Floodplain Management," a statement of findings would be required for actions proposed by this alternative, which would be included in the final document.

Impacts on Threatened and Endangered Species. Actions proposed by this alternative would not have significant long-term or cumulative impacts on the peregrine falcon or its habitat. Temporary impacts could occur as a result of construction activities associated with building a ticketing booth in Battery Park. The increased noise levels accompanying construction and/or the increased presence of heavy-duty vehicles and numbers of personnel on site could cause the peregrines to search elsewhere for their food supply within a 2- to 3-mile radius of their nest site. The overall impact from this construction or management of the park would not be threatening to the individual's existence within the project vicinity. Therefore, short-term impacts on this species would also not be considered significant.

Mitigative measures that the National Park Service would employ to ensure that significant impacts (either short- or long-term) would not occur include the following:

1. Regular site monitoring would be conducted by park resource specialists to ascertain absence/presence of the peregrine in the project area.

2. If disturbance is noted by the park resource specialist, construction activities would be modified (i.e., stop using noisy equipment, dispersing construction employees, or stop work if deemed necessary) when peregrines are flying in the project vicinity.

3. If disturbance is considered a high risk to the peregrines during nesting/fledgling season (May–July), a work stoppage order would be issued, if deemed necessary, after consultation with the U.S. Fish and Wildlife Service and appropriate city and state regulatory agencies.

4. Any attempts at onsite pest management, including rodents or nuisance birds, would be required to comply with the NPS integrated pest management policy and with state regulations and approval. Pest management would specifically exclude NPS use of rodenticides on the site. However, the city Department of Parks routinely distributes rat poison throughout Battery Park.

5. The National Park Service would work cooperatively with the U.S. Fish and Wildlife Service and the city and state endangered species coordinators to ensure all possible measures were identified and used throughout construction to eliminate any potential threat or disturbance to the peregrines in the project vicinity.

Impacts on Regional Land Uses and Visitor Facilities

Moving Statue of Liberty/Ellis Island ticketing activities outside the boundaries of Castle Clinton could require the dedication of limited city park land in Battery Park for a new ticketing facility, as well as for queuing the many visitors who purchase tickets. This loss of land and space would be detrimental to other park users, such as city residents, who use the park for both active and passive recreational activities and would also conflict with the needs outlined by the community board in their 1995 report. Constructing a new ticketing facility would also impair the experience of current Battery Park users in the short term because of the noise, visual impacts, and pollution related to construction activities.

However, moving ticketing outside the fort would be advantageous for Heritage Trails New York because of the enhanced interpretive and education opportunities available for users of the trail.

Impacts on Socioeconomic Environment

If the construction contract for a ticketing facility were awarded locally, some short-term jobs or benefits would occur. Vendors might also benefit from increased visitation.

Individuals using the site for temporary shelter might be displaced due to enhanced

security. They would likely continue to occupy nearby areas, such as Battery Park.

Impacts on Visitor Use and Interpretation

The number of people at the site would decrease substantially due to the removal of the ticket sales. However, the number of visitors coming to see the site itself might increase with the enhanced quality of the visitor experience — enhanced by the lack of crowds/ticket lines, the availability of NPS staff freed from the necessity of crowd control, and the removal of the two nonhistoric structures used for ticket sales from the fort's parade ground, as well as the new interpretive exhibits focussing on the fortification period, costumed interpretation, and events such as open-air concerts.

Impacts on NPS Operations

Less staff time would be required for crowd control and related activities, although staff might assist at the relocated ticket area. The maintenance and repair tasks would also decrease due to less use (due to the removal of ticket sales and accompanying crowds).

Cumulative Impacts

Expanded space and interpretive programs would provide larger areas to use for interpretive and educational purposes.

Although the ticketing facility would be removed from Castle Clinton, this action would not impact the vendors or street performers because the facility would still be in Battery Park. The Statue of Liberty and Ellis Island might have a more active role in the ticket sales after it is removed from Castle Clinton. Vendors might benefit from the increase in visitation.

The approved transfer of former city-owned park land at Hamilton Grange (see *Final General Management Plan / Environmental Impact Statement, Hamilton Grange National Memorial* (NPS 1995c), and the proposed transfer of city park lands at Grant's tomb (alternative 3) and possible transfer of land at Castle Clinton (alternative 2), there could be cumulative impacts because these actions represent a larger loss of city-owned open space and facilities than the loss associated with just one proposal. Conversely, these land transfers might be beneficial because the National Park Service would be improving and maintaining the acquired acreage and facilities at Battery Park, Hamilton Grange, and Grant's tomb, relieving the city of some of the financial burdens associated with maintenance costs.

Heritage Trails New York would benefit from the ticket booth relocation by enhancing the interpretive and educational opportunities available for users of the trail away from the crowds.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

Although unlikely, archeological resources could be irreversibly and irretrievably impacted by construction for a new ticketing facility. However, mitigative measures, such as preconstruction site surveys and site monitoring during construction would properly protect these resources. The construction of this facility would commit less than 1 acre of existing park/open space into a built environment. Parkland within the area is limited, and this would constitute an irreversible and irretrievable commitment of natural resources if it is built on a vegetated area. However, mitigation through careful siting would help protect the dominant resources (trees and wildlife needs).

ALTERNATIVE 3 — PROPOSED ACTION

Impacts on Cultural Resources

With construction to provide for the performance uses, the appearance of the fortification would be significantly altered. As in alternative 2, if a new building was constructed for ticketing purposes, the associated actions would be evaluated to determine if and what additional section 106 and National Environment Policy Act compliance would be required.

Impacts on Historic Structures. Altering the existing reconstructed fortification to include a roof would visually affect the historic and original stone walls of the 1811 structure. Mitigative measures, such as the use of a clear differentiation of materials in a compatible design and careful construction techniques, would avoid significant impacts. The alteration would involve removing the 1980s ticketing kiosks and much of the nonhistoric materials used in the 1970 reconstruction and would refocus the interpretive emphasis of the fortification.

Impacts on Historic Landscape/Viewshed. Because this alternative involves physical changes to the structure and character of the surrounding area, there would be an impact on the landscape/viewshed of the area and the visual scene from Battery Park, Roosevelt Mall, Pier A and fire station, as well as the view from offshore to the Manhattan skyline. However, because there would be little or no removal or alteration of the existing landscaping, the impact on the surrounding natural landscape elements would be minimal.

Furthermore, as in alternative 2 the construction of a new ticketing facility could have a negative impact on the Battery Park landscape depending on the location of the structure. This impact would be mitigated by designing and locating the ticketing facility to be compatible with the surrounding environment. Construction activities could also have a short-term impact on the landscape. If the former ticketing facility is used, steps to renovate and upgrade the facility would occur. Because this building already exists, there would be no additional impacts on the landscape.

Impacts on Archeological Resources. The possibility of impacting any archeological resources within the boundaries would be unlikely. Battery Park, surrounding Castle Clinton, is also on landfill, and the potential for deriving information pertaining to Castle Clinton is remote. However, during any construction, if archeological resources were discovered, proper procedures would be applied to mitigate any possible impacts on those resources.

Impacts on Natural Resources

The impacts of alternative 3 would be the much the same as those described for alternative 2 but also applied to the new performance structure. This includes converting the inside area of the fort to a built environment, short-term impacts on some small mammal species during construction and a long-term reduction of available open space habitat, and short-term impact on air quality during construction (mitigated by monitoring construction and using appropriate construction techniques). In addition, the new facility could impact some natural resources, especially soils. Like the mitigation discussed for the ticketing booth for alternative 2 for a new structure, the roof drainage and drainage around the castle would be directed into onsite retention basins to ensure that drainage percolated into the ground and did not go directly into the harbor.

Impacts on Floodplains. The impacts of this alternative would be the same as those discussed for alternative 2 — being within the 100-year floodplain, the new structure

would be required to incorporate methods for protecting life and minimizing storm damage and the roof design would also be required to withstand the impact of a major storm (the predicted 12-foot storm surge).

Impacts on Threatened and Endangered Species. The impacts under this alternative would be the same as alternative 2 as applied to the development of the structure and roof at the castle — without mitigative measures there could be temporary impacts on the peregrines. Mitigative measures, such as monitoring, possibly stopping work activities (especially during nesting/fledgling season), not using rodenticides, and working with the state, would be the same as those described in alternative 2 for constructing the ticketing booth.

Impacts on Regional Land Uses and Visitor Facilities

If the ticket facility were relocated from the Castle Clinton structure, the impacts would be the same as in alternative 2 — an advantage for Heritage Trails New York because of the enhanced interpretive and educational opportunities available for trail users.

The development of Castle Clinton would draw more users into Battery Park and encourage the enhancement of the current park and other proposed uses (such as Pier A) through increased visibility and public awareness.

Impacts on Socioeconomic Environment

The new entertainment options and interpretive exhibits would provide social and cultural activities for the community and park visitors, Wall Street financial center, and residents of Manhattan and other boroughs. The artists, performing arts groups, and other groups using the building would also benefit by having a facility in which to perform.

Businesses adjacent to Battery Park could benefit from a potential increase in tourist trade, particularly during the evening hours when performances are held.

If the construction contract was awarded locally, some additional short-term jobs could be created for local businesses. Local businesses could also temporarily benefit from purchases by the construction crews.

The change in use at Castle Clinton and resulting visitation increase would place additional demand on local sewer and water lines. The current limited onsite capacity would have to be increased to accommodate future needs.

Individuals using the site for temporary shelter might be displace due to enhanced security. They would likely continue to occupy nearby areas, such as Battery Park.

Impacts on Visitor Use and Interpretation

Under this alternative, visitation levels and the quality of the experience would be greater than that provided by either of the other alternatives. Enclosing Castle Clinton with a roof would permit the site to develop its fullest interpretive potential.

Ticket sales, either inside the Castle or relocated nearby, would be accommodated and improved, perhaps by computerized ticket sales and reservations. This would decrease the wait for tickets and the associated congestion and enhance visitor experience. The addition of live programming and performing arts events could make Castle Clinton a destination site in lower Manhattan.

This alternative would allow for the in-depth coverage of the themes through exhibits, talks, and educational and entertainment events; thus, the most extensive and rewarding visitor experience would be provided under this alternative.

Impacts on NPS Operations

More staff and operational funds would be required for the actions under this alternative. Updated ticketing sales methods and more space would allow a more efficient use of space and visitor time, and less staff time would be spent on crowd control. However, staff might be assisting at the new ticketing facility if this facility were relocated from inside the structure. The roof would prevent the weather from affecting site use.

Cumulative Impacts

The attractions provided by both the Pier A project and the new entertainment options and interpretive exhibits could attract many visitors and city residents to the Battery Park area. The two facilities, in combination, would likely attract more visitors than each facility would attract alone, benefitting the local businesses and concessions of the city. As discussed in alternative 2, the relocation of ticket sales from Castle Clinton to a nearby facility could result in a loss of city-owned open space for a ticketing structure. However, the occurrence of simultaneous events at both sites could cause overcrowding in Battery Park and cause added traffic circulation and parking problems, as well as severely stressing the existing infrastructure (roads, water, and sewer) if adequate capacity is not provided with each project. This visitation increase could also require additional city police to patrol the Battery Park area. Given the current city budget and lack of available positions, such needs would negatively affect an already constrained budget.

The entertainment center at Castle Clinton, in combination with the improvements to Battery Park and Pier A (as the Harbor Park visitor center) would cumulatively create a variety of unique educational, interpretive, recreational, and entertainment opportunities for residents and visitors. Together these actions would provide a cultural center for local residents and enhance the character of Battery Park. They could also substantially increase the number of people who visit Battery Park during the day and in the evening, creating a potential economic benefit for the vendors and performers who work in the Battery Park area.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

This alternative involves physical changes to the structure and character of the surrounding area that could be considered irreversible and irretrievable. The viewshed from Battery Park, Roosevelt Mall, Pier A, the Fire Station, and the view from off shore to the Manhattan skyline would be most affected by the proposed roof construction over the castle. There would be a loss of nonhistoric materials used in the 1970s effort to restore the reconstructed fortification.

Impacts that would result from implementing this alternative would also be mitigated through the development of the new entertainment options and interpretive exhibits, which would provide social and cultural activities for the Wall Street financial center businesses, area residents, and other park visitors. The artists, preforming arts groups, and various groups using the facility would also benefit by having a facility in which to perform. There could be potential benefits for the lower Manhattan businesses.

Federal Hall

National Memorial

Manhattan Site • New York

PURPOSE OF AND NEED FOR THE PLAN

SITE DESCRIPTION AND BACKGROUND

Federal Hall National Memorial (completed in 1842) is in lower Manhattan in the heart of the financial district at the intersection of Wall, Nassau, and Broad Streets; it is completely surrounded by skyscrapers. The exterior of Federal Hall was modeled after the Parthenon. The principal facade fronts Wall Street, and the rear fronts Pine Street. The west wall faces Nassau Street, and the east wall faces an alley (see Federal Hall Neighborhood map). Federal Hall measures 177 feet in length and 89 feet in width and occupies an area of just less than 0.5 acre. The building is constructed completely of stone with a white marble exterior. Today, the building houses the administrative offices of Manhattan Sites, NPS Northeast Field Offices, cooperators offices and classrooms, and exhibits pertaining to the history of the site.

The first building known on this site, constructed in 1703, was New York City's second city hall. In 1788 the building was renamed Federal Hall; it became the first capital of the United States under the Constitution, and in 1789 George Washington was inaugurated here. In 1812 that Federal Hall was demolished and replaced with a small brick building that served as the U.S. Customs House. In the late 1830s that building was demolished and construction of the existing building started; the new U.S. Customs House was completed in 1842. From 1862 to 1920, the building was the U.S. government's main subtreasury. In 1939 the secretary of the interior designated the building as a national historic site, and in 1955 it was redesignated as Federal Hall National Memorial.

SIGNIFICANCE

Federal Hall National Memorial commemorates the inauguration of George Washington as America's first president. It was also the site of the first American capital under a federal constitution, the birthplace of constitutional government, and where Congress adopted the Bill of Rights. The existing building is significant both historically and architecturally. Historically, it served as a U.S. customs house and a subtreasury.

PURPOSE AND NEED

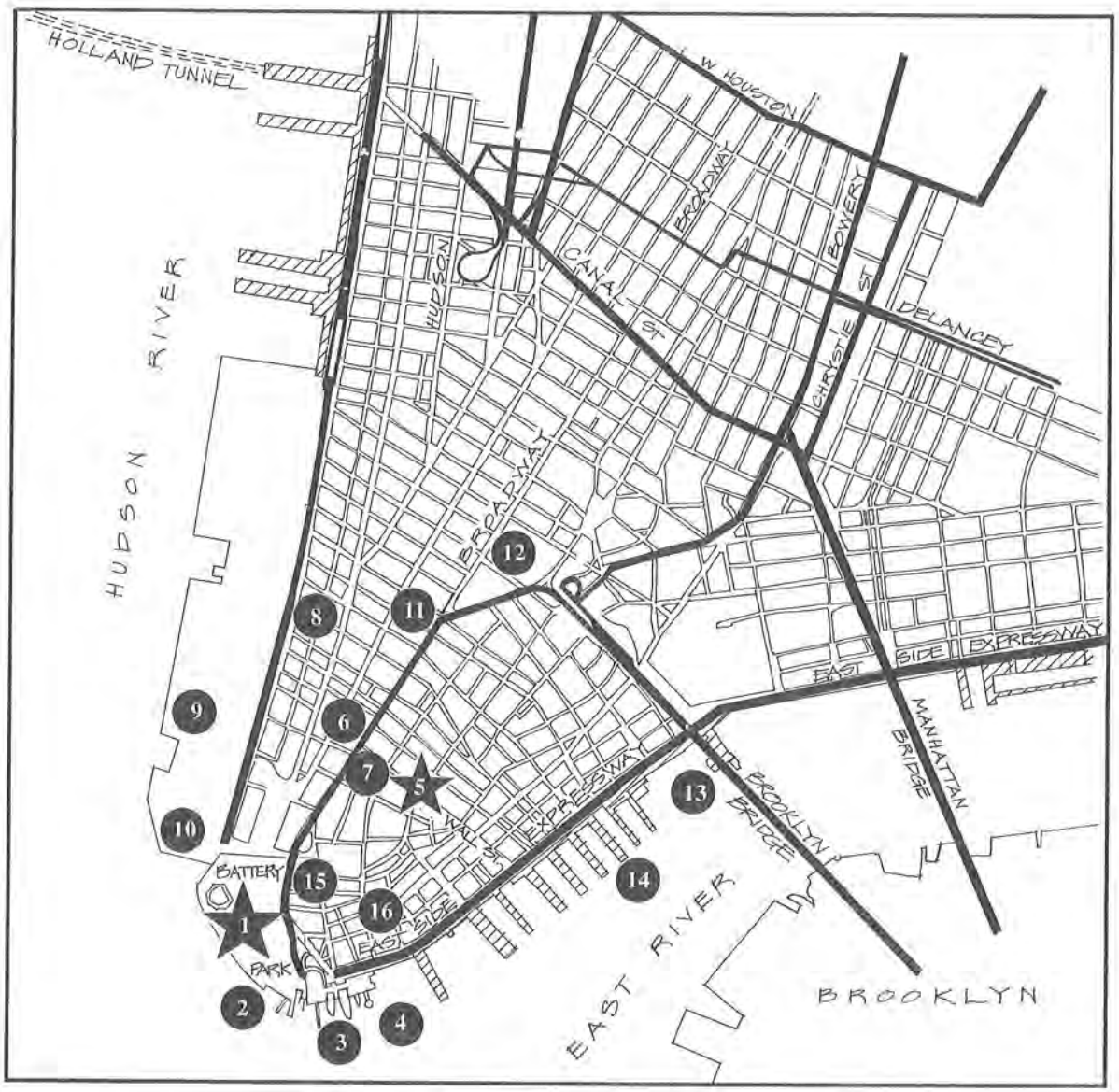
The purpose of the plan is to guide future management of Federal Hall National Memorial, develop a way to use the building to interpret the story of Federal Hall and the site more clearly and effectively for visitors, and resolve structural and mechanical (heating-ventilation) problems.

ISSUES TO BE ADDRESSED IN THE PLAN

The history of the site and the current building is important and complex. Many historic events have taken place on the site. However, the message is confusing because the building in which some of those events took place no longer exists. The existing building's architecture, an outstanding example of Greek Revival, was designed by architects and constructed by builders of national importance.

Much of the inside is office space or space that is dedicated to various historical and educational associations, which leaves little room to show visitors around and fulfill the site's potential for public enjoyment. In addition, the educational programs presented at the site are focused on school groups and thus reach only a limited public. The exhibits will continue to be renovated to

1. CASTLE CLINTON NATIONAL MONUMENT
2. FERRY TO STATUE OF LIBERTY AND ELLIS ISLAND
3. FERRY TO STATEN ISLAND
4. FERRY TO GOVERNORS ISLAND
5. FEDERAL HALL NATIONAL MEMORIAL
6. TRINITY CHURCH
7. NEW YORK STOCK EXCHANGE
8. WORLD TRADE CENTER
9. BATTERY PARK CITY
10. PIER A - NYC FIRE DEPARTMENT
11. WOOLWORTH BUILDING
12. CITY HALL
13. BROOKLYN BRIDGE
14. SOUTH STREET SEAPORT MUSEUM
15. SMITHSONIAN NATIONAL MUSEUM OF THE AMERICAN INDIAN
16. FRAUNCES TAVERN



NEIGHBORHOOD
Castle Clinton National Monument
Federal Hall National Memorial

NORTH 0 1/4 1/2 MILE

United States Department of the Interior/National Park Service
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reflect the current interpretive themes. Stories such as the current and historic link to the stock exchange and the surrounding neighborhood, as well as the relationship with the subtreasury are some of the themes that could be interpreted.

There is continuing structural damage to the building due to differential settlement and subway motion under the building. The heating, ventilating, and air-conditioning system needs to be upgraded.

ALTERNATIVES FOR DEVELOPMENT AND PRESERVATION FOR FEDERAL HALL NATIONAL MEMORIAL

INTRODUCTION

Interpretive themes and objectives and three alternatives have been developed for the management of Federal Hall National Memorial. Alternative 1 is a no-action / continuation of existing management alternative, which would continue existing management of the site. Alternatives 2 and 3 present different management options and site uses. Federal Hall National Memorial contains unique resources that would be protected and interpreted under any of the alternatives.

Interpretive Themes

Interpretive displays and programs at Federal Hall would focus primarily on how events that occurred on the site and in the various structures were integral to the development and implementation of our present form of government. It was on this site that the first president of the United States was inaugurated; the Congress, the Cabinet, and the Supreme Court were organized; the financial system of the country was established; and the Bill of Rights was adopted. The following primary themes would be used to interpret the site:

- The inauguration of George Washington on this site was the inauguration of our present form of government.
- The 18th-century Federal Hall on this site was the first capitol of the United States under the Constitution and was the building in which Congress met for its first session. It was here that the Continental Congress and the Stamp Act Congress met and where the Bill of Rights was adopted. In its name and location, the existing Federal Hall memorializes those events integral in the development of our federal government.
- The existing Federal Hall and its predecessor, the U.S. Customs House, were integral in the development of the U.S. Treasury system. On Wall Street, in the heart of the country's primary financial district, Federal Hall served as the most important of six subtreasuries because it was the repository for 70% of the federal government's revenues.
- The site of Federal Hall holds a particular association to our enduring American freedoms as the location of the trial of John Peter Zenger, affirming the freedom of the press.
- The architecture of the existing Federal Hall symbolizes the strength and stability of the nation through its Greek Revival style and stone construction.

The difference in the interpretation of these themes in the alternatives would be the time period(s) interpreted and the depth of interpretation. Alternative 1 would continue existing interpretation of the themes, which focuses on the history of the first Federal Hall. Alternative 2 would update the interpretive themes to include more current history. Alternative 3 would provide the space and means to interpret the entire history of the structure (an in-depth treatment of each theme).

Visitor Experience

The National Park Service has the following goals for visitors.

- Visitors could understand the progression of buildings on the site and their roles in relation to the significant events in the development of our national government.
- Visitors to Federal Hall could learn about the other national park system sites as

well as other related sites in New York City and opportunities for visiting those sites.

- The public could understand and appreciate the National Park Service's role in preserving our cultural heritage and support those preservation efforts.

ACTIONS COMMON TO ALL ALTERNATIVES

All alternatives would continue the restoration and preservation of the building, as well as effective use of space. An in-depth study of all structural needs would be conducted, and physical preservation of the building would occur through repair and rehabilitation of the building's historic material and heating-ventilation/air-conditioning systems. The monitoring of building movement and structural cracking would continue. Security and maintenance procedures would be sensitive to the condition of the building and would be coordinated with preservation efforts.

New or updated exhibits and special programs are proposed in all alternatives, which would require updated brochures and outside wayside exhibits. The interpretive media would be accessible to non-English-speaking visitors and visitors with special needs. The waysides would include a brief history of the site, a map and location of other national park system sites in the area, and schedules for tours and special events. Various programs would target all age groups and sizes and time frames. Topics would include the workings of constitutional government and could be expanded to cover our government's financial workings.

The second-floor north galleries would be used for conference space, educational programs, and exhibits, and to support park operations.

Various programs would target all age groups, sizes and time frames. Area schools and adult education classes would be contacted.

The cooperator affiliated with Federal Hall, currently the Constitutional Education Foundation, would continue its involvement with the site and its school programs and educational facilities.

The accessibility for visitors and employees with mobility impairments would be enhanced with the repair and upgrade of the Pine Street entrance, including the repair of porch materials and security lighting.

ALTERNATIVE 1: NO ACTION / MINIMUM REQUIREMENTS

Alternative 1 would be a continuation of existing trends and meet minimum requirements; there would be little change to the site (see Federal Hall, Existing Floor Plans). Exhibits on the first floor in the galleries and vaults around the rotunda and in the north end of the building would be renovated and upgraded to portray the principal site themes. The exhibits in the first-floor rotunda would be relocated to more appropriate areas within the building. The second-floor south galleries would continue to be used for exhibit space.

Most of the museum collections would be stored on the third floor, which is being improved to accommodate the collections for Federal Hall, Castle Clinton, General Grant, Hamilton Grange, and part of Saint Paul's. Ultimately, the collections for General Grant and Hamilton Grange would be stored at Hamilton Grange, all of Saint Paul's museum collection would be consolidated at Saint Paul's, and the collection for Theodore Roosevelt Birthplace would remain at that site. The Federal Hall and Castle Clinton collections would be the only collections permanently stored at Federal Hall. Some of the collections would remain on the lower level.

The third floor would also continue to house NPS offices, offices for cooperators, and archives, library, and general reference materials associated with Federal Hall and the other sites.

The lower level would continue to contain maintenance offices, custodial space, shipping and receiving storage space, office space for cooperators, and a multipurpose meeting room. Exhibits in the lower level rotunda that depict the history of the site would be updated to focus on the existing building and its role in the development of the American financial system. NPS tours and school programs would continue as funds and staff were available.

The building would be managed as a historic zone. The first and second floors would be managed as preservation zones, and the lower level and third floors would be managed as preservation/adaptive use zones. The staffing for this alternative would continue to be five full-time employees with annual operational costs of about $354,700. This alternative would be the least costly of the three alternatives (see appendix C), requiring about $655,000 for implementation and interpretation.

ALTERNATIVE 2: PROPOSED ACTION — RESTORATION AND PRESERVATION OF FEDERAL HALL

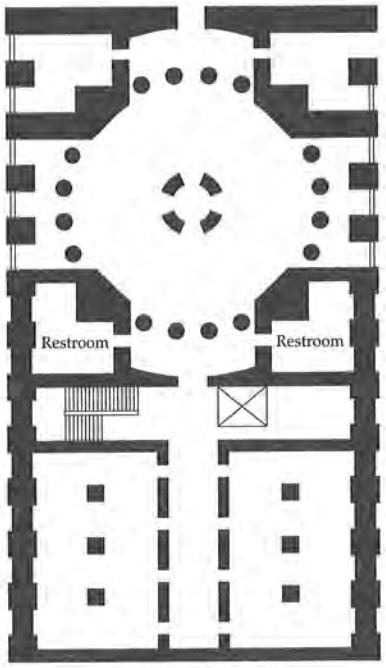
Through spatial planning and flexible relationships with the cooperators, this alternative would expand public use of space at Federal Hall by the National Park Service and cooperators. A visitor information center would be developed in a section of the first floor to provide information on the site as well as the other units of the Manhattan Sites, Heritage Trails New York, and the nationwide national park system sites. A wide variety of exhibits and interpretive and educational / school programs would convey the interpretive themes that are associated with the historic and contemporary Federal Hall. The complexity of the site's history would require a full range of media: film, interactive videos, graphics, artifacts and archive collections, text, and interpretive tours.

Through its roles as a customs house and a subtreasury, the building would illustrate a story about the growth of New York City and the nation's financial and commercial development. The history of the building as a subtreasury would be interpreted, using the vaults as exhibits. The building's architecture and the building itself would be interpreted as a significant landmark in the story of American architectural history. Exhibits would focus on style, technology, and changing uses to help visitors understand it as a 19th-century structure and an example of how people express ideas and values through architecture.

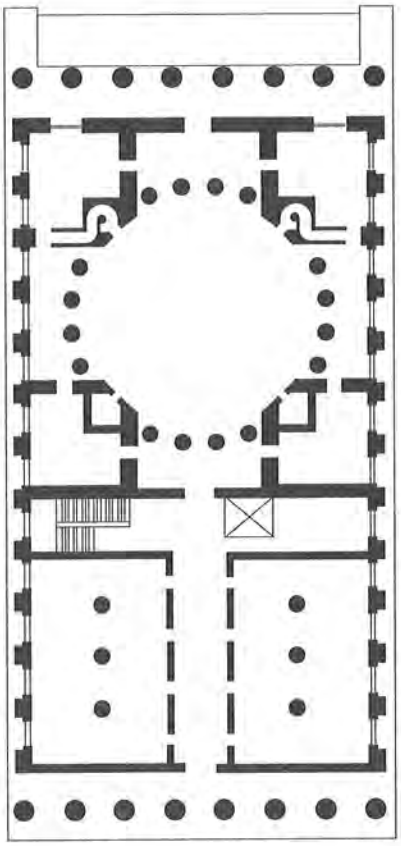
Exhibits on the first and second floors would be updated. Use of the second-floor north galleries would be expanded to provide for special events, public programming, and other purposes consistent with the park's broad interpretive and preservation mission. Second-floor south galleries would be used for exhibits and displays related to the subthemes of Federal Hall.

The third floor would be used for NPS office space and archival and reference storage. Following a study of spatial needs and structural considerations, the southern portion or rotunda area of the lower level would be rehabilitated to accommodate cooperator offices, classrooms, and meeting space with possible direct access from Nassau Street. Remaining areas of the lower level would continue to be used for NPS operations, including appropriate maintenance, custodial, warehousing, and shipping and receiving activities.

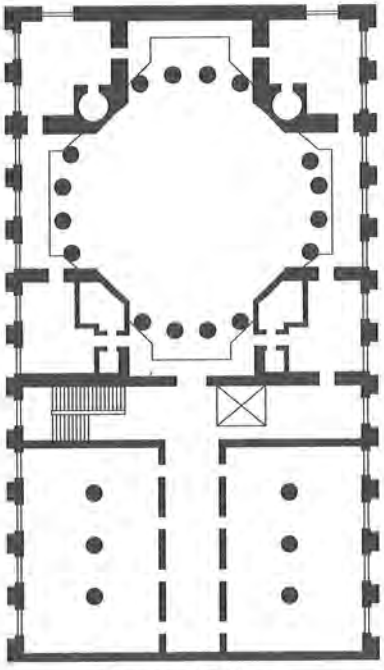
The museum collections would also be stored on the third floor, which is being improved to accommodate the collections for Federal Hall, Castle Clinton, General Grant, Hamilton Grange, and part of Saint Paul's. Ultimately, the collections for General Grant



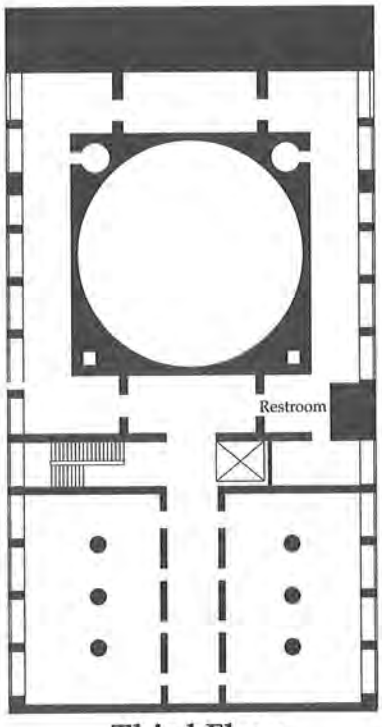
Lower Level



First Floor



Second Floor



Third Floor

EXISTING FLOOR PLAN

Federal Hall

National Memorial

United States Department of the Interior • National Park Service

DSC / Feb. 1996 / 377 / 20,021

No Scale

and Hamilton Grange would be stored at Hamilton Grange, all of Saint Paul's museum collection would be consolidated at Saint Paul's, and the collection for Theodore Roosevelt Birthplace would remain at that site. The Federal Hall and Castle Clinton collections would be the only collections permanently stored at Federal Hall.

The building would be managed as a historic zone. The first and second floors and part of the lower level would be managed as preservation zones, which means that use of these areas, with necessary modifications, for contemporary public and/or administrative purposes would perpetuate the cultural qualities of this building. The third floor and the remainder of the lower level would be managed as a preservation/adaptive use zone. The staffing for this alternative would require eight full-time employees, and the annual operational costs would be about $400,000. This alternative would be more costly than alternative 1 and less costly than alternative 3 (see appendix C), requiring about $5 million for implementation and interpretation.

ALTERNATIVE 3: VISITOR INFORMATION CENTER

Alternative 3 would turn Federal Hall into an exhibit-intensive interpretive facility that would fully educate visitors on the history of the site and the associated key events in the development of the nation. The use of the building would become dedicated to public use. The headquarters of the park and the cooperators and the administrative and maintenance functions would be relocated to nearby rented space.

An NPS visitor information center in a section of the first floor would be developed to provide information on the site as well as the other Manhattan Sites and the nationwide national park system sites. The center would have a staffed desk, interactive media, and a toll-free telephone link providing specific information and answering questions about all the parks in the national park system. This information center, which would also continue to serve as an anchor visitor center for the Heritage Trails New York, would provide information regarding related historic sites in the New York area as well as the cooperators involved with the trail. Brochures and operational schedules of national park system parks and other appropriate sites would also be available.

The principal themes for which Federal Hall National Memorial was created would be fully interpreted through exhibits using models, prints, tours, and text interpreting the historic Federal Hall and the important events that took place at the site. For example, the cashroom in the lower level could be restored and interpreted to reflect the banking history of the site. Other media, such as dioramas, artifacts, prints, and videos could also be used. The existing building would be the backdrop in which the story of the development of the nation and New York from the 18th century to present would be interpreted. The interpretive themes of all Manhattan sites would be conveyed through videos, graphics, and printed material, and interactive activities, such as computers.

As in alternative 2, the exhibits in the second-floor south galleries would be updated to provide a more updated version of the history of Federal Hall.

Special programs, such as performing arts and community events, would occur at Federal Hall; part of the third-floor space would be converted into an auditorium/lecture area that would hold special events such as lecture series, seminars, concerts, and film series. The cooperators would continue to run appropriate programs at the site. Scheduled tours for school and other groups would remain, with NPS interpretive staff recounting histories. New educational programs for students of all ages would be developed by the National Park Service to convey a wide range of themes relating to Federal Hall as well as other related sites.

The museum collections would be stored on the third floor, which is being improved to accommodate the collections for Federal Hall, Castle Clinton, General Grant, Hamilton Grange, and part of Saint Paul's. Ultimately, the collections for General Grant and Hamilton Grange would be stored at Hamilton Grange, all of Saint Paul's museum collection would be consolidated at Saint Paul's, and the collection for Theodore Roosevelt Birthplace would remain at that site. The Federal Hall and Castle Clinton collections would be the only collections permanently stored at Federal Hall.

The site would be managed as a historic zone, the first and second floors would be managed as preservation subzones, and the third floor and lower level would be managed as preservation-adaptive use zones. The staffing for this alternative would require 13 full-time employees, and the annual operational costs would be about $650,000. This alternative would be the most costly of the alternatives (see appendix C), requiring about $12 million for implementation and interpretation.

TABLE 4. SUMMARY OF ALTERNATIVES FOR FEDERAL HALL

	ACTIONS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2 — PROPOSED ACTION	ALTERNATIVE 3
Use of Space	Would continue effective use of space.	Basically, continue existing use of space.	Would expand public use of space.	Would turn Federal Hall into exhibit-intensive interpretive facility that would fully educate visitors on the history of the site and key events in the development of the nation. Space would be dedicated to public use.
Visitor Information Center			Visitor information center developed in section of first floor; would provide information about area sites, including Heritage Trails New York, and nationwide national park system sites.	NPS information center developed, with information on area, Manhattan Sites, Heritage Trails New York, and nationwide national park system sites.
Exhibits, Brochures, Waysides, Tours, and Programs	Exhibits and special programs would be new or updated; interpretive media would be accessible to non-English-speaking people and those with special needs; waysides would include brief site history, map, location of other area sites, and tour/event schedules. Two second-floor north galleries would be used for conference space, educational programs, exhibits, and to support park operations. Various programs would target all age groups, sizes and time frames. Area schools and adult education classes would be contacted.	Exhibits on first floor in galleries and vaults around the rotunda and in north end of building would be renovated and upgraded to portray site themes. Exhibits in first-floor rotunda would be relocated. Second-floor south galleries would be used for exhibit space. Exhibits on lower level would be updated. NPS tours and school programs would continue as funds and staff were available.	Wide variety of exhibits, films, videos, graphics, artifacts and archive collections, text, tours, and interpretive and educational/school programs would convey themes. Building's roles as custom house and subtreasury would illustrate story about growth of New York City and the nation's financial and commercial development. Building architecture would be interpreted. Updated exhibits on first and second floor north galleries would be provided for special events, public programming, and other purposes consistent with the park's broad interpretive and preservation mission. Second-floor south galleries would be used for short-term exhibits and displays.	Themes interpreted through exhibits, models, text, graphics, interactive activities, tours, and videos. Update exhibits in second-floor south galleries. Special programs, such as performing arts, concerts, films, and community events, would occur at Federal Hall in converted auditorium/lecture space on third floor. New educational programs would be developed.
Collections		Most collections would be stored in improved third-floor curatorial collections space; some would remain on the lower level. Collections for some other sites stored here on interim basis.	All collections would be stored in improved third-floor curatorial and collections space.	Same as alternative 2.

	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action	Alternative 3
Structure	Would continue restoration and preservation of the building. An in-depth study of structural needs would be conducted; physical preservation of the building would occur through repair and rehabilitation of the building's historic material and heating-ventilation/air-conditioning systems. Monitoring of building movement and structural cracking would continue.			
Park Operations		NPS offices, cooperators offices, curatorial and collections space, and library and archives would continue on third floor. Maintenance offices, custodial and shipping/receiving space, offices for cooperators, and multipurpose meeting room would continue in lower level.	Third floor would be used for NPS office space and archival and reference storage. Following study of spatial needs and structural considerations, rehabilitate southern portion or rotunda area of lower level to accommodate cooperator offices, classrooms, and meeting space (possible access from Nassau Street). Continue use of remaining lower level areas for NPS operations, including maintenance, custodial, warehousing, and shipping-receiving activities.	Park and cooperator headquarters and administrative and maintenance functions would be relocated to nearby rented space.
Cooperators	Constitutional Education Foundation would continue its involvement			Cooperators programs would continue.
Accessibility	Accessibility for mobility impaired visitors and employees would be enhanced.			
Staffing		5 full-time employees	8 full-time employees	13 full-time employees
Annual Operating Costs		$354,000	$400,000	$650,000
Implementation Costs (including interpretation)		$655,000	$4,993,000	$12,185,000

TABLE 5. SUMMARY OF IMPACTS FOR FEDERAL HALL

TOPIC	IMPACTS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2 — PROPOSED ACTION	ALTERNATIVE 3
Impacts on Cultural Resources				
Impacts on Historic Structures	Subway movement and building settling would continue to impact structure.	No additional impacts.	With introduction of architectural elements to reconfigure space, some historic materials could be impacted. These actions would be mitigated by careful design and continuing efforts to repair and conserve building's historic fabric.	Same as alternative 2; also, converting part of third floor into auditorium space would impact some historic building materials, which would also be mitigated by careful design and construction.
Impacts on Museum Collections		Protection and preservation of most artifacts would be enhanced by third-floor improvements for museum collection storage and conservation work and eventual storage at or near each site.	Protection and preservation of artifacts would be enhanced by third-floor improvements for museum collection storage and conservation work and eventual storage at or near each site.	Protection and preservation of artifacts would be enhanced by third-floor improvements for museum collection storage and conservation work and eventual storage at or near each site.
Impacts on Ethnographic Resources	Unknown.			
Impacts on Historic Landscape	No impacts.			
Impacts on Archeological Resources	There would be no impacts.			
Impacts on Natural Resources — Floodplains, Threatened or Endangered Species, and Coastal Zone Management	No impacts.			
Impacts on Regional Land Uses and Visitor Facilities		No impacts.	Establishing visitor information center would provide information about and enhance use and visibility of city/local sites and opportunities (such as Heritage Trails New York) as well as nationwide national park system sites — a benefit to visitors. Would benefit multiple national park system and other agency sites in the New York area by providing information on site locations and themes.	Same as alternative 2, plus area buildings that have rental space would benefit from relocation of NPS and cooperator offices.

Topic	Impacts Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action	Alternative 3
Impacts on Socioeconomic Environment		No impacts.	The expanded interpretive exhibits and educational programs would provide cultural and educational opportunities for the New York City metropolitan area.	Same as alternative 2.
Impacts on Visitor Use and Interpretation		Some changes to site interpretation. Visitor experience would be improved, although coverage of the history of the site would still be limited.	Quality and quantity of visitor experiences, especially programs for schoolchildren and groups, would be improved. Some increase in visitation would be expected. Interpretive themes would be explained in more depth than in alternative 1, including comprehensive knowledge of site history. New interpretive media and programs and outreach programs would benefit area residents, schoolchildren, and adults interested in citizenship. The information center would provide nationwide information and a positive service to visitors regarding national park system sites in New York and across the country.	Same as alternative 2, but with most positive impact on interpretation and visitor experience. Themes, subthemes, and site history would be fully interpreted.
Impacts on Transportation	No new impacts.			
Impacts on Cooperators		Constitutional Education Foundation could continue to operate as they have.	Information center, improved/new interpretive media and programs, and use of space would affect activities that have been offered by cooperators; some activities and cooperator offices would be relocated. Information center would promote cooperator activities. The proposed programs would expand the interpretive and educational role of both the National Park Service and the Constitutional Education Foundation. Extensive cooperation between these two groups would be required. Foundation would be affected by having their offices and classroom spaces relocated to lower level.	Close cooperation between National Park Service and Constitutional Education Foundation would continue to be important. Relocation of offices might affect administration of educational programs.

Topic	Impacts Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action	Alternative 3
Impacts on NPS Operations		No impacts.	Increased interpretive staff would be needed; visitor information center would require more phones and electrical systems, and thus more maintenance responsibilities. With increased visitation, custodial duties would also increase.	Same as alternative 2, plus additional staff would be needed for interpretive and security purposes. Separation of personnel from the resource might impede daily site operations (such as maintenance or custodial care).
Cumulative Impacts		No new impacts.	In combination with Pier A and other proposed visitor centers, visitors would have numerous opportunities to learn about Manhattan and its history. Tourism-related groups, businesses, and organizations would benefit also.	Same as alternative 2.
Unavoidable Adverse Impacts / Relationship between Short-term Uses and Long-term Productivity / and Irreversible and Irretrievable Commitment of Resources	Subway movement and the settling of the building could result in the continuing deterioration of Federal Hall's historic fabric, which could, in time, become an irreversible and irretrievable commitment of that resource.	No new impacts.	Interior historic fabric could be irreversibly and irretrievably committed for visitor center; this would be mitigated in part by protecting these elements during design. Reconfiguration of space use and restoration/preservation of building would enhance historic fabric.	Same as alternative 2; there could be added irreversible and irretrievable impacts from converting part of third floor into an auditorium.

CULTURAL RESOURCES

Brief History of the Site and Structure

The existing Federal Hall building is the third structure known to have occupied the site. The first building, completed in 1703, was the city hall that housed the government functions of our young nation. Meetings of the Common Council and the Provincial Assembly and Courts took place here, and in 1735 the issue of the freedom of the press was brought to the fore when John Peter Zenger was charged with seditious libel and tried in this city hall. In 1765 the Stamp Act Congress met in city hall; the building became the permanent home for the Articles of Confederation from 1785 to 1788.

In 1788 city hall was renovated for the Congress under plans made by Maj. Charles Pierre L'Enfant, the French-born architect who had served as an American army officer during the Revolutionary War and was most well known for his design of Washington, D.C. The renovated Federal Hall was described as the largest and the grandest building in the United States. L'Enfant's design had a stone facade that included 13 stars as symbols of the original colonies that had become states. The most pronounced symbol portrayed an eagle grasping a shield and clutching 13 arrows in one claw and an olive branch in the other, representing war and peace. The building symbolized a new and strong nation, free from tyrannized rule. On April 30, 1789, Gen. George Washington took his oath as the first president of the United States on the building's second-story balcony.

After the inauguration, Federal Hall became the first capitol of the United States under the Constitution. The first U.S. Congress officiated here and in 1789 adopted the Bill of Rights. The foundation of the federal government was established with the creation of the Treasury Department, the Justice Department, the State Department, and the Post Office. The court system was aligned through the Judiciary Act that established the Supreme Court and the lower federal courts. When Congress and the capital moved to Philadelphia in 1790, Federal Hall was returned to its function as city hall. In 1812, when the current city hall was completed, Federal Hall was abandoned and then demolished. A small brick building was soon erected on that site, becoming the U.S. Customs House.

As lower Manhattan began to flourish and Wall Street became the financial center for the nation, it was obvious that the U.S. Customs House was inadequate. In 1833 the planning for a new building started with a competition for the design, and in 1842 the new U.S. Customs House was completed. In 1862 the former Customs House building was converted into a subtreasury under the Independent Treasury System. Because it retained 70% of the federal government revenues, it was considered the most important of six subtreasuries. For 60 years it served as a storage facility for gold and silver coins.

When the subtreasury moved out in 1913, various federal agencies occupied the building. In the mid-1930s, when the building was put on a surplus buildings list, a group of concerned citizens saved it from demolition. In 1939 planners for the New York World's Fair established a visitor's information bureau in the lower level, including displays concerning the old Federal Hall. On May 26, 1939, to coincide with the opening of the World's Fair, the secretary of the interior designated the old subtreasury as a national historic site to commemorate the site of Washington's inauguration.

The same group that set up the information bureau, the Federal Hall Memorial Associates, signed a cooperative agreement

with the National Park Service in 1940, making the building a permanent museum and national shrine. On August 11, 1955, Congress officially renamed the building Federal Hall National Memorial (69 Stat. 632), and the National Park Service became its full owner. It was listed on the National Register of Historic Places on October 15, 1966, and historical documentation was submitted on October 20, 1976.

Restoration and renovation efforts in the early 1960s removed most traces of the subtreasury presence, restoring the public areas for exhibit space and modernizing the office areas. Currently it houses the superintendent and administrative offices for Manhattan Sites, NPS field offices, and the Constitutional Education Foundation.

Architectural Description and Development

Federal Hall is built into a south-facing slope. The ceremonial and main building entrance from the south or Wall Street is marked by 18 monumental granite steps that rise to the first floor. From the north or Pine Street, just three steps rise to the first floor. Each facade is marked by eight Doric columns and a porticoed entrance. Thirteen engaged piers define the sides, two tiers of windows are situated between the piers, and a third tier of windows is in the metopes; lower level windows have been blocked up. The roof is constructed of marble slabs. The exterior stone, Westchester (New York) marble, is characterized by large grains and a white color. Standing on a pedestal on the front steps is a large bronze statue of George Washington. An iron fence is between columns and piers on the east and west ends of the south portico and between columns and piers along the rear facade.

Although the building exterior resembles the Parthenon, the interior, with its domed rotunda, is derived from Roman building practices. The rotunda, in the southern half of the building, is 60 feet in diameter and enclosed by 16 Corinthian columns rising 25 feet from the floor to support the dome. The crown of the dome rises 54 feet above the floor and is surmounted by a lantern. The dome is finished in plaster, embellished with palmettes and rosettes, and is painted white.

Federal Hall has six levels: the subbasement, lower level, three floors, and an attic. The structure consists of Doric columns, piers, and groin vaults. The three floors are arranged with a central hall flanked by rooms on either side; originally, matching staircases led off the hall at the southern end, immediately to the north of the rotunda. Piers, walls, and bases are of Westchester marble with a tooth-chiseled finish. The flooring is white- and gray-veined West Stockbridge (Massachusetts) marble, and the stairs are Hallowell (Maine) granite.

Vaults and walls are constructed of brick that is faced with plaster and painted white. Railings, window frames and sash, and doors are cast iron, finished to imitate patinated bronze. Room divisions, dropped ceilings (especially on the third floor), and an elevator are the primary visual changes to the original spatial configuration.

In 1833 the Treasury Department sponsored an open architectural competition for the design of a new customs building for New York City. The winning scheme, a Greek temple surmounted by a dome, was designed by Ithiel Town and Alexander Jackson Davis, prominent New York architects. The original scheme was modified during construction — most notably the dome was reduced to a lantern and the rotunda on the interior was moved from the center of the plan to the south end. Building construction was supervised by John Frazee, a well-known New York sculptor.

The U.S. Customs House played an important role in spreading the Greek Revival style, which became the preeminent architectural style in the United States during the first half of the 19th century. As an entirely stone building, the marble walls, brick vaulting, and marble slab roof made it not

only fireproof but also demonstrated the structural potential of masonry construction.

Twenty years after the completion of the building, modifications were made for housing the subtreasury. In the 1870s the security of the building was enhanced with gun turrets on the roof, new vault doors in the rotunda, new vaults in the lower level, window bars, and a hydraulic elevator in the location of the former west stair.

In 1883 John Quincy Adams Ward's statue of George Washington was installed on a marble pedestal on the front steps. The statue commemorated Washington's inauguration and the foundation of the government of the United States.

Throughout the 1960s, various repairs and small modifications were made. The exterior was cleaned and repointed, gun turrets and iron window bars and shutters were removed, a new elevator was installed, and the interior was cleaned and painted. Maintenance projects have continued to this day with no major alterations to the plan.

Museum Collections

Federal Hall's collections include the Messmore Kendall collection of Washingtonia and a significant archive of materials on the building and on the history of New York. The museum collections for Castle Clinton National Monument, General Grant National Memorial, Hamilton Grange National Memorial, and part of Saint Paul's Church National Historic Site are also stored here.

Ethnographic Resources

Ethnographic resources at Federal Hall are unknown. Until the potential existence of these resources is determined, the park will continue to recognize and maintain relationships that would respect different lifestyles, ethnic preferences, cultural diversity, and social groupings.

NATURAL RESOURCES

Natural resources at Federal Hall are nonexistent due to the fact that the site is bound by concrete and occupied by the building's structure. There are no vegetative, water resources, wetlands, or soil resources of significance. The site is outside the floodplain.

Wildlife

Wildlife species are limited due to the built environment and include those types commonly associated with structures in the inner city. These species include small mammals such as mice and rats. Insects include those considered as pests such as silverfish, cockroaches, and ants. Common birds include those species representative of the urban environment such as pigeons, English sparrows, starlings, and sea gulls.

Threatened and Endangered Species

Consultation with the U.S. Fish and Wildlife Service office in New York and the Significant Habitat unit of New York Department of Environmental Conservation revealed that the peregrine falcon *(Falco peregrinus)* is on federal and state lists of endangered species and is known to breed and use habitat near Federal Hall (see appendix D). According to the New York Natural Heritage program, the peregrine falcon has heritage global and state rank of G3 and S2, respectively. The G3 rank, which reflects the falcon's rarity throughout the world, indicates it is either (1) very rare and local throughout its range, (2) that it is found locally in a restricted range, or (3) that it is vulnerable to extinction throughout its range because of other factors. The S2 state rating means that the species (1) is limited typically to 6 to 20 occurrences, (2) has few remaining

individuals, or (3) that there are factors that make it very vulnerable.

Staff members of the natural resources unit of the city Department of Environmental Conservation are actively involved in the perpetuation and management of peregrine falcons in the city.

SOCIOECONOMIC ENVIRONMENT

General Characteristics

Federal Hall is in Community District 1 at the southern tip of Manhattan. This area includes the Wall Street financial district, Tribeca, and well-known tourist attractions such as the Statue of Liberty, the World Trade Center, and the South Street Seaport Museum. The district's residential population increased almost 60% during the 1980s, largely due to the construction of new high-rise housing on a site adjacent to Battery Park. Gentrification and an influx of "young, urban professionals" are indicated by income and household composition; households headed by individuals between 25 and 45 years old report the highest incomes and make up most of the resident households. Overall, residents exhibit very high levels of educational attainment and fall into the middle and upper income levels, with a correspondingly low level of poverty.

The district has a residential population of 25,277, with a median household income of $47,445 (1989 constant dollars) and per capita income of $37,228. Most households rent rather than own their apartments or condominiums, and they pay a median gross rent of $935 per month. With the development of projects such as Battery Park City near Castle Clinton, the number of housing units and associated residents has increased 82% and 59%, respectively, between 1980 and 1990. Because of this new development, district 1 has changed from a 9 to 5 workplace to a dynamic, seven days/week residential and business community that also has numerous tourist attractions.

Residents of Community District 1 are predominantly of European ancestry, with the major groups being German (14%), Irish (11.9%), and Italian (11.9%). Reported groups with African or Hispanic ancestry each number less than 1%. The 1990 percentage of foreign-born residents was 20.7, which represents an increase of 120.5% over 1980 figures; half of these were recent immigrants. Nearly 27% of residents speak a language other than English in the home; 44% of these speak an Asian or Pacific Islander language.

Local Issues

Some of the concerns that the community board reports in the area, and which affect the National Park Service and Federal Hall as well, include the presence of the homeless, protection of historic resources such as cobblestone streets, and transportation and parking problems. The district is working on a solution with the city for assisting homeless individuals.

Lower Manhattan, the location of Federal Hall, is the oldest part of New York City and features the city's oldest streetscape. Lower Manhattan is set apart by the small remnants of old New York that are found in its historic districts; cobblestone streets are a major component of these districts. Local residents, visitors, and movie crews value these streets and want them preserved by the city.

Traffic congestion throughout the district is an ever-increasing problem. The street grid in lower Manhattan dates back to the 1700s and early 1800s and was not designed to handle present-day traffic. Suggested solutions include additional traffic agents to prevent gridlock, aggressively ticketing illegally parked vehicles, and creating a bus terminal with bus storage facilities at the Battery parking garage. Such a facility would help visitors access attractions in lower Manhattan, help prevent the air pollution caused by traffic and congestion, and help prevent pedestrian/vehicle problems.

REGIONAL LAND USE AND VISITOR FACILITIES

Federal Hall, overshadowed by modern skyscrapers, is in New York City's financial district on Wall Street. The area houses banks, insurance companies, brokerage and investment houses, and commercial business firms. The Wall Street District, as it is commonly called, also contains Battery Park and Castle Clinton, Bowling Green, Fraunces Tavern, the U.S. Customs Building, the New York and American stock exchanges, Trinity Church, and the Twin Towers of the World Trade Center.

New Development

Real estate values in New York City are among the highest in the country. Because of increasing assessed values of real property in lower Manhattan, the skyline is continually changing, with higher buildings rising above older facades. The addition of residential units in nearby Battery Park City has increased the availability of residential housing in lower Manhattan. This new community could also promote visitation to Castle Clinton, Federal Hall, and other historic sites as new residents seek nearby cultural and recreational opportunities. Pier A (the Harbor Park visitor center) proposed near Castle Clinton and the Heritage Trails New York (see below) might also increase visitation to Federal Hall by bringing New York visitors into lower Manhattan and orienting them to different opportunities in the lower Manhattan/New York City area.

Heritage Trails New York

Heritage Trails New York is a composite of four walking tours in lower Manhattan. The purposes of the trails are to help increase public awareness of the history of Wall Street and its surrounding environment and to highlight the historical events and places related to the development of our nation. Beginning at Federal Hall, one of these trails takes visitors south to Battery Park and Castle Clinton. These heritage trails are being sponsored by major institutions, organizations, governments, and individuals in downtown Manhattan.

COOPERATORS

The Constitutional Education Foundation is a charitable nonprofit foundation that manages the Constitution Works educational program at Federal Hall. The Constitution Works provides a hands-on educational program in American history and government that prepares young people in grades 6 through 12 for civic participation. Some of the many purposes of the program include promoting an understanding of constitutional democracy, illustrating the relevance of the Constitution and the Bill of Rights to current issues, and providing young people with an understanding of their basic civil rights.

The foundation bears all costs of its programs and is qualified under applicable laws to engage in fund-raising activities. The National Park Service preserves and maintains the facility and provides space, furniture, and equipment for the program and foundation offices. The National Park Service cooperates with the foundation in planning and executing the foundation's program and in fund-raising activities.

CARRYING CAPACITY

The carrying capacity at Federal Hall is influenced by the site's resources, staff, and building entrances and exits. The maximum amount of people the site can accommodate is 350 at any given time, which is based on safety regulations and preservation of the resources.

NPS OPERATIONS

The current operating costs at Federal Hall are $354,000, with a staff of five full-time employees.

TRANSPORTATION

The subway system is one of the easiest ways to access the site. The Rector Street stop on the Broadway Local brings the visitor within several blocks of Federal Hall. The IRT subway trains nos. 1, 2, 3, 4, and 5, as well as the BMT J, N, and R trains, all provide service to the area around Federal Hall. City bus service is also available to the area via the M1, M6, and M15 buses. The site is in convenient walking distance from the South Ferry, the landing place for ferries from Staten Island, Governors Island, and the Statue of Liberty. Parking is difficult in the area and is prohibited on most streets around the site.

VISITOR USE AND INTERPRETATION

Visitation at Federal Hall has varied over the past 10 years, reaching a high in 1986 (when the celebration of the centennial of the Statue of Liberty led to a series of special exhibits at Federal Hall, including the Magna Carta and other documents). Peak-day visitation usually coincides with special site events and may be as high as 20,000 visitors, depending on the event.

In addition to the dioramas, exhibits, tours, interpretive talks, school programs, and collections, many other different programs in Federal Hall attract visitors. The Constitutional Educational Foundation currently presents classroom and concert programs that attract many visitors. Classical concerts presented on Wednesdays once attracted the highest weekday visitation, drawing 80 to 100 visitors. Other special events include corporate receptions, symposiums, ceremonies, hearings, and cultural events/exhibits. For example, past programs have focused on topics such as black history; women's history; Native American music, poetry, drama, and dance; a reenactment of George Washington's inauguration; exhibits on Yankee baseball memorabilia; and the New York-Tokyo Student Art Exchange. All such events are free to the public.

The Constitution Works program, which began in April 1989, served about 1,418 students from Manhattan, the Bronx, Brooklyn, and Queens in spring 1989. Participation in the program continues to increase each year. During the 1993-94 school year, 7,678 students from the five New York City boroughs attended the program.

TABLE 6. FEDERAL HALL, VISITATION

Year	Visits/Year
1983	118,238
1984	160,097
1985	255,768
1986	526,277
1987	363,847
1988	343,307
1989	286,866
1990	293,825
1991	191,436
1992	133,570
1993	131,342
1994	171,414

NOTE: Visitation is counted by park ranger or volunteer with counting device at site entrance. For special events, the number of people that fill one area is multiplied by the number of areas that are the same size and also filled with people.

IMPACTS COMMON TO ALL ALTERNATIVES

Impacts on Cultural Resources

Impacts on Historic Structures. Subway movement and building settling would continue to impact structure.

Impacts on Ethnographic Resources. An ethnographic study would be needed to determine if any ethnographic resources exist, the contemporary groups associated with them, and whether they would be impacted by actions under these alternatives.

Impacts on Historic Landscape. None of these actions would affect the surrounding cityscape or historic resources.

Impacts on Archeological Resources. There would be no impacts because none of the actions of any of the alternatives propose any ground-disturbing activities.

Impacts on Natural Resources

There would be no perceived short- or long-term impacts on the natural resources associated with the actions proposed in any of the alternatives. Pest control strategies implemented would be in accordance with NPS integrated pest management policy (IPM). Approval by NPS IPM coordinators would be sought to ensure that environmental degradation would not occur to other resource values and that food chains were not impacted by the use of such chemicals.

Impacts on Floodplains. Federal Hall is outside the 100- and 500-year floodplains as determined by the Federal Emergency Management Agency. Therefore, there would be no associated impacts on floodplain values at Federal Hall through the actions proposed by these alternatives.

Impacts on Threatened or Endangered Species. The alternatives would not affect any species listed as endangered or threatened or habitat considered critical by the U.S. Fish and Wildlife Service or the Significant Habitat Unit of New York Department of Environmental Conservation. Because no new development is proposed under any of the alternatives, there would not be any new impacts on the peregrine falcon, which is on federal and state lists as endangered and has been observed in the vicinity of Federal Hall.

Impacts on Coastal Zone Management. With required concurrence with New York's coastal zone management program, there would be no impacts on coastal zone management.

Impacts on Transportation

There would be no new impacts on methods or modes of transportation around Federal Hall.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

Subway movement and the settling of the building could result in the continuing deterioration of Federal Hall's historic fabric, which could, in time, become an irreversible and irretrievable commitment of that resource.

ALTERNATIVE 1

Impacts on Cultural Resources

Impacts on Historic Structures. This alternative would not introduce any

elements that would affect the historic fabric, construction, or integrity of the interior or exterior of this structure. Added security lighting and waysides would not impact the historic fabric because care would be taken during installation.

Impacts on Museum Collections. The protection/safety and preservation of most of the stored artifacts would be enhanced by their location on the third floor where the area is being improved. The expanded area would allow room for conservation work. Although they would be stored for the interim in Federal Hall, artifacts pertaining to Hamilton Grange and Saint Paul's Church would eventually be stored at each individual site, and the Grant collection would eventually be stored at the restored Hamilton Grange. This would be a positive benefit because each collection would be at or near each site.

Impacts on Natural Resources

There would be no impacts on natural resources.

Impacts on Regional Land Use and Visitor Facilities

Actions proposed in alternative 1 would not result in impacts on adjacent land uses or facilities.

Impacts on Socioeconomic Environment

Actions proposed in alternative 1 would not result in any changes to local socioeconomic characteristics.

Impacts on Visitor Use and Interpretation

The actions of this alternative would provide some changes to the site interpretation. Although some of the exhibits would be upgraded, and improved interpretive media would offer a higher quality visitor experience, the exhibits would still offer a limited coverage of the history of the site. This would continue to be a negative impact on visitors because the history of Federal Hall might not be fully understood.

Impacts on Cooperators

The Constitutional Education Foundation could continue to operate the same performances and programs at Federal Hall. No actions are proposed in alternative 1 that would affect their operations.

Impacts on NPS Operations

This alternative would bring little change to the current operating procedures at Federal Hall. The spatial use would remain the same, and site support functions, including maintenance, improvements to third floor collections storage, and custodial care, would continue as they currently exist.

Cumulative Impacts

Under alternative 1, the Heritage Trails New York would continue to use Federal Hall as a contact area and starting point for the trails.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

There would be no new impacts under this alternative.

ALTERNATIVE 2 — PROPOSED ACTION

Impacts on Cultural Resources

Impacts on Historic Structures. This alternative would require the introduction of architectural elements to reconfigure space within various areas of the lower level and all three floors, which could impact some historical materials. These actions would be mitigated by careful design and continuing efforts to repair and conserve the building's historic fabric.

Impacts on Museum Collections. The protection/safety and preservation of the stored artifacts would be enhanced by their location on the third floor where the area is being improved. The expanded area would allow room for conservation work. Although they would be stored for the interim in Federal Hall, artifacts pertaining to Hamilton Grange and Saint Paul's Church would eventually be stored at each individual site and the Grant collection would eventually be stored at the restored Hamilton Grange. This would be a positive benefit because each collection would be at or near each site.

Impacts on Natural Resources

There would be no impacts on natural resources.

Impacts on Regional Land Use and Visitor Facilities

The establishment of a visitor information center in Federal Hall would provide information about and enhance the visibility and use of local sites and opportunities, such as the Heritage Trails New York, as well as other sites and opportunities throughout New York City and nationwide national park system sites. The dissemination of such information would be a positive benefit to visitors. Implementation of this alternative would benefit multiple national park system and other agency sites in the New York area by providing information on site locations and themes.

Impacts on Socioeconomic Environment

The expanded interpretive exhibits and educational programs would provide cultural and educational opportunities for residents in the lower Manhattan and Battery Park areas, as well as for the Wall Street working population. Federal Hall could become an educational resource for a good portion of the New York City metropolitan area.

Individuals using the site for temporary shelter might be displaced due to enhanced security. They would likely relocate to nearby areas.

Impacts on Visitor Use and Interpretation

Under this alternative both the quality and the quantity of the visitor experience would be improved. Some increase in visitation would be expected if a strong effort is made to market the facility and its newly developed resources. Special programming for schools and organized groups offered by the National Park Service and cooperators would be the major improvement in overall visitor use. The information center would provide nationwide information and a positive service to visitors regarding national park system sites in New York and across the country.

The new interpretive exhibits, programs and expanded outreach provided under alternative 2 would educationally benefit schoolchildren in area schools and adults interested in constitutional government and pursuing citizenship.

Under this alternative, the interpretive themes would be explained in more depth than in alternative 1, which would provide visitors with a comprehensive knowledge of Federal Hall's history.

Impacts on Cooperators

The expansion of public use space in Federal Hall through the creation of a visitor information center and a wide variety of exhibits and interpretive and educational programs would be developed in cooperation with the cooperators using Federal Hall. Spatial changes would occur. For example, if the information center and exhibits fully use the rotunda area on the first floor, activities such as concerts that were sponsored by cooperators in the past would be relocated to a different area. Conversely, with the visitor information center providing information on local sites, such as the Heritage Trails New York, the use of such opportunities would be promoted and the goals of groups such as Friends of the Heritage Trail would be fostered.

The proposed programs on the workings of constitutional government (and other topics) for adults and school-age children would expand the interpretive and educational role of both the National Park Service and the Constitutional Education Foundation within Federal Hall and, in comparison to alternative 1, would require extensive communication and cooperation between the two groups. The foundation would be affected by having their offices and classroom spaces relocated to the lower level.

Impacts on NPS Operations

An increase in interpretive staff would be necessary to take advantage of increased visitor use potential. The new visitor information center would require more operational resources, such as telephone and electrical systems, which could require more maintenance responsibilities. Also, an increase in visitation would lead to more custodial duties for the staff.

Cumulative Impacts

The expansion of public use and information in Federal Hall in combination with other proposed visitor centers, such as the one proposed at Pier A, would provide numerous opportunities for New York City visitors to learn about the city, particularly Manhattan, and its many historical sites and educational and recreational opportunities. These centers would benefit visitors as well as the many groups, organizations, and businesses that support tourism in New York City.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

An irreversible and irretrievable commitment of the interior historic fabric could result from new structural elements for visitor services proposed under this alternative. Mitigative measures, such as maximum protection of these elements during the design phase of alternative development, would reduce these impacts. The reconfiguration of space use in the interior and the restoration/preservation of the building would result in an overall enhancement to the historic fabric of the structure.

ALTERNATIVE 3

Impacts on Cultural Resources

Impacts on Historic Structures. As in alternative 2, this alternative would introduce several new structural elements (as well as visitor services) that would affect portions of the interior fabric. For example, the reconfiguration of space for the visitor information center and the auditorium on the third floor would negatively impact some historic building materials through construction activities. However, careful design and construction of the new areas

would mitigate extensive loss of historic fabric. This would be mitigated by careful design and the continuing effort to repair and conserve structural materials.

Impacts on Museum Collections. The protection/safety and preservation of the stored artifacts would be enhanced by their location on the third floor where the area is being improved. The expanded area would allow room for conservation work. Although they would be stored for the interim in Federal Hall, artifacts pertaining to Hamilton Grange and Saint Paul's Church would eventually be stored at each individual site and the Grant collection would eventually be stored at the restored Hamilton Grange. This would be a positive benefit because each collection would be at or near each site.

Impacts on Natural Resources

There would be no impacts on natural resources.

Impacts on Regional Land Use and Visitor Facilities

The establishment of a visitor information center in Federal Hall would provide the most information about and enhance the visibility and use of local sites and opportunities, such as the Heritage Trails New York, as well as other sites and opportunities throughout New York City and nationwide national park system sites. The dissemination of such information would be a positive benefit to visitors. Implementation of this alternative would benefit multiple national park system and other agency sites in the New York area by providing information on site locations and themes.

Both the National Park Service and cooperators would seek office space close to Federal Hall, which would have a positive impact on area buildings that have available rental space.

Impacts on Socioeconomic Environment

Similar to alternative 2, the expanded interpretive function of the site would provide beneficial cultural and educational opportunities for the residents and working population of lower Manhattan and New York City.

Individuals using the site for temporary shelter might be displaced due to enhanced security. They would likely relocate to nearby areas.

Impacts on Visitor Use and Interpretation

There would be a positive impact on the interpretation and the visitor experience at Federal Hall. Expanded room would provide the space and opportunity to fully and comprehensively interpret the history of the site through the themes. These themes could be expanded on using subthemes, such as the history of the Stamp Act Congress. The interactive exhibits, such as the computer programs, would offer students and visitors other interpretation-related opportunities.

Impacts on Cooperators

The Constitutional Education Foundation would continue to work closely with the National Park Service to determine the types of programs appropriate for Federal Hall. The relocation of the foundation's office space might affect the administration of the educational programs.

Impacts on NPS Operations

Impacts on NPS operations would be much the same as described in alternative 2. An increase in staffing would be necessary to take advantage of the increased visitor use potential. Because NPS and cooperators' staff offices and administrative/maintenance operations would be relocated to a nearby building, additional staff rangers would be

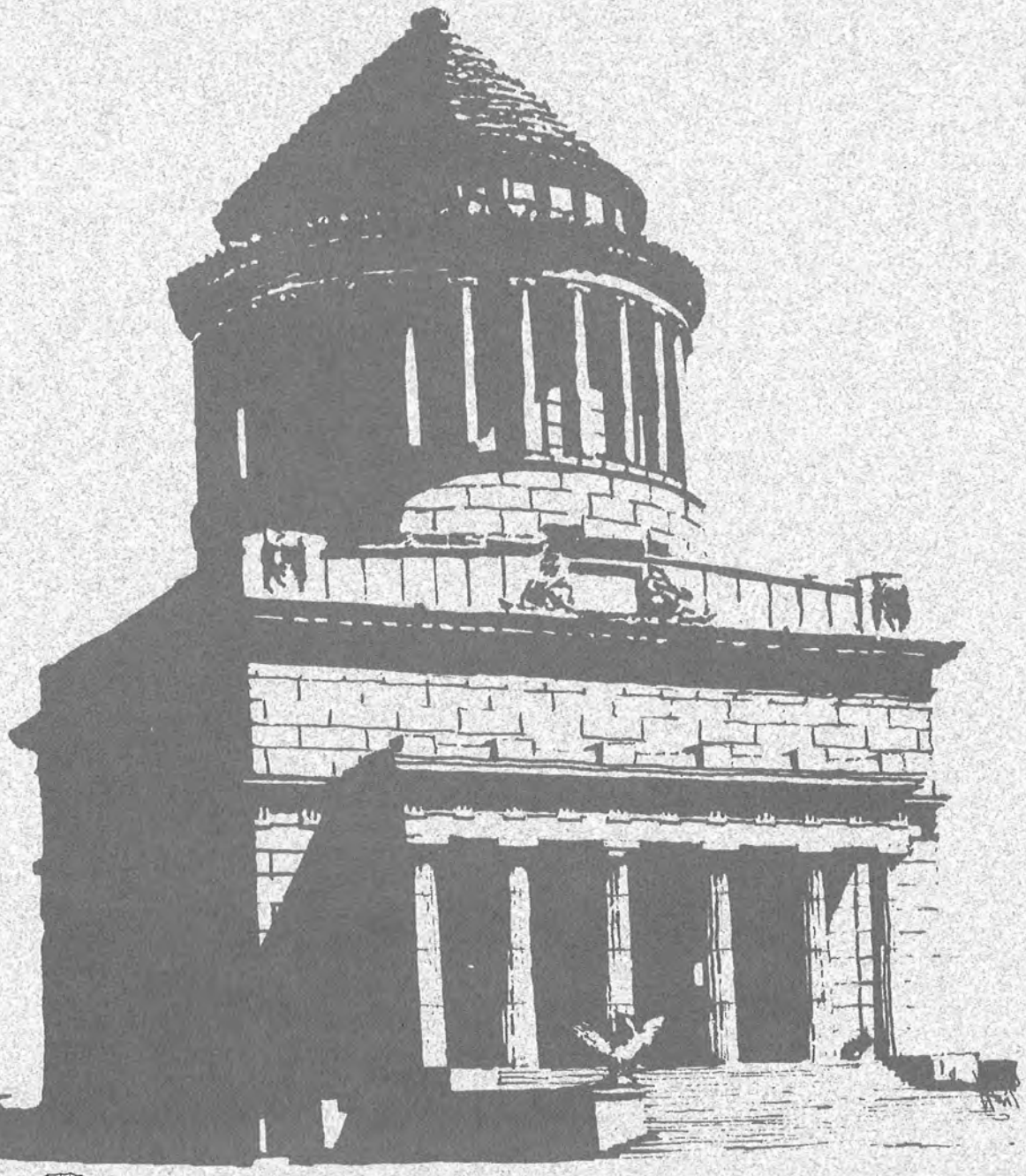
needed for interpretation and security in the newly opened areas. The separation of personnel from the resource might impede daily operations (such as maintenance or custodial care).

Cumulative Impacts

The cumulative impacts of this alternative would be the same as in alternative 2. The expansion of public use and information in Federal Hall in combination with other proposed visitor centers, such as the one proposed at Pier A, would provide many opportunities for New York City visitors to learn about the city, particularly Manhattan, and its many historical sites and educational and recreational opportunities. These centers would benefit visitors as well as the many groups, organizations, and businesses that support tourism in New York City.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

These impacts would be the same as described under alternative 2. An irreversible and irretrievable commitment of the interior historic fabric could result from new structural elements for visitor services and auditorium proposed under this alternative. Mitigative measures, such as maximum protection of these elements during the design phase of alternative development, would reduce these impacts. The reconfiguration of space use in the interior and the restoration/preservation of the building would result in an overall enhancement to the historic fabric of the structure. In addition, these alterations would expand public use at Federal Hall.



NATIONAL PARK SERVICE
DEPARTMENT OF THE INTERIOR

General Grant

National Memorial

Manhattan Site • New York

SITE DESCRIPTION AND BACKGROUND

General Grant National Memorial, commonly known as Grant's tomb, is on a 130-foot high promontory overlooking the Hudson River on Riverside Drive at West 122nd Street in the West Harlem area of Manhattan (see General Grant Neighborhood map). The memorial (constructed from 1891-97) is a granite structure, 150 feet high and 90 square feet in area, in Riverside Park.

SIGNIFICANCE

General Grant National Memorial, the largest mausoleum in the United States, provides the final resting place of former General and President Ulysses S. Grant and his wife, Julia Dent Grant. The memorial represents gratitude for the Civil War hero who helped preserve the Union. Architecturally, it exemplifies the mixture of classical forms and motifs, on a massive scale, that characterizes turn-of-the-century architecture. Interior paintings, mosaics, and sculpture reflect the desire, on the part of the Grant Monument Association and the National Park Service, to embellish the tomb with artistic pieces commemorating General Grant.

PURPOSE AND NEED

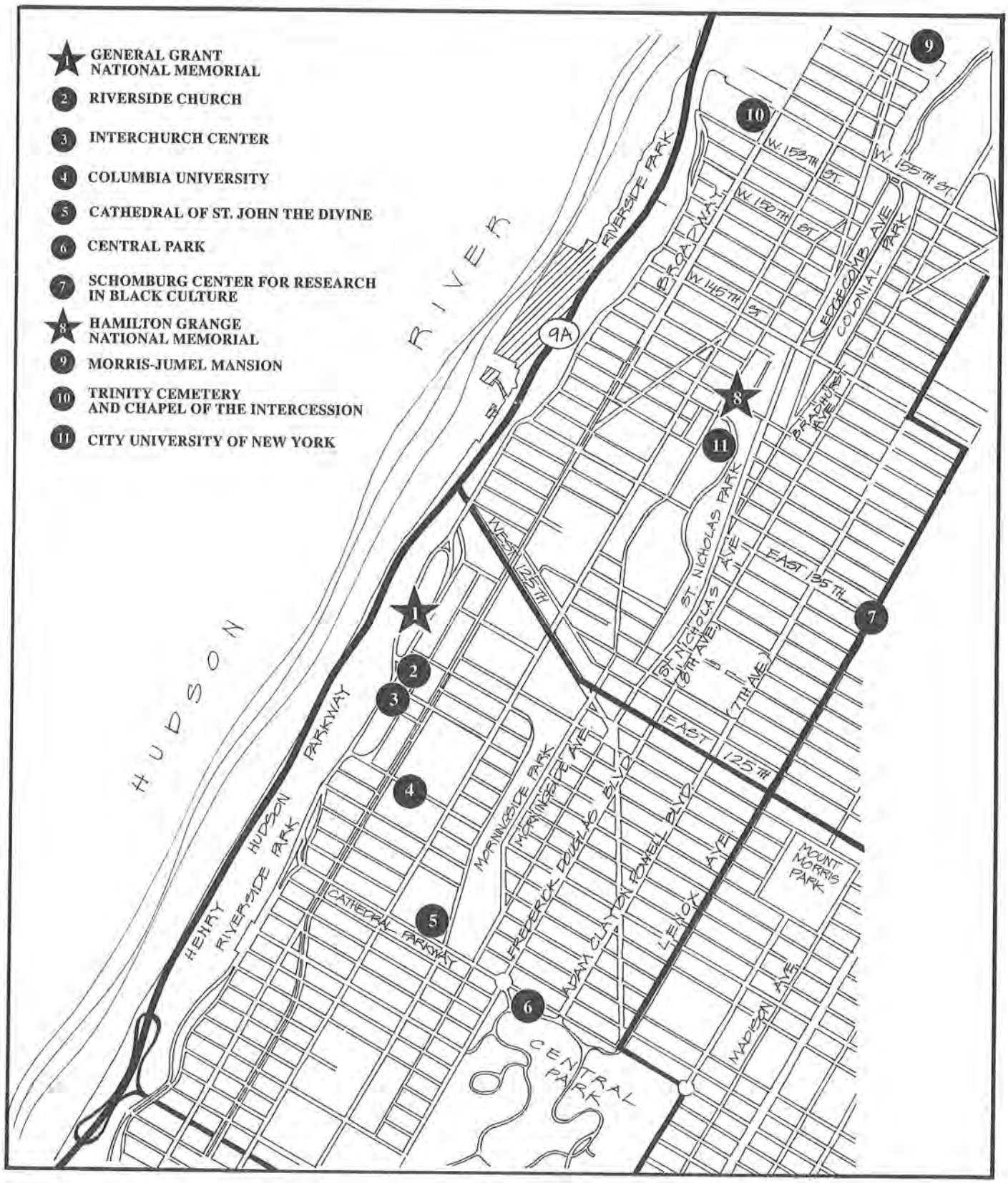
The purpose of this plan is to guide future management of the General Grant National Memorial and enhance the visitor experience at the site.

ISSUES TO BE ADDRESSED IN THE PLAN

Because the main purpose of the structure is a mausoleum housing the remains of the Grants, a high degree of solemnity and decorum is expected within the building. As such, book sales and tourism displays are inappropriate to the solemnity of the memorial. The two reliquary rooms are not being used as originally intended — to display the battle flags associated with the eastern and western campaigns of the Civil War. A collection of Grant memorabilia (photos, prints, memorial documents, and mementos) remains in storage due to the lack of an appropriate place to display them. There are no public restroom facilities, and the site is not accessible to visitors with disabilities.

NPS ownership is limited to the mausoleum and its surrounding terrace. Riverside Park and the ellipse and plaza area around the tomb is owned and operated by the city's Department of Parks and Recreation, including the overlook pavilion across the street. The National Park Service does not have jurisdiction over use or maintenance of the surrounding park area. Cultural events that occur on the plaza, such as the Jazzmobile concerts and activities associated with Harlem Week, are events integral to the community. Custodial and security issues associated with these events are temporary and do not affect the overall management of the site.

The mosaic sculptured seating bordering the terrace walls outside the tomb were constructed and installed to commemorate the 100th anniversary of Grant signing Yellowstone National Park into legislation. The mosaic seating was custom-designed for the space and built around trees. The preservation and maintenance of the mosaic seating have become issues over the years because the growing tree trunks and roots are causing the concrete basing to crack and the mosaic tiles to dislodge. The relocation of the seating would help preserve and maintain this resource.



NEIGHBORHOOD

General Grant/Hamilton Grange

National Memorials

United States Department of the Interior/National Park Service

DSC / Jan. 1996 / 416 / 408 / 20,032

NORTH 0 1/4 1/2 MILE

ALTERNATIVES FOR DEVELOPMENT AND PRESERVATION OF GENERAL GRANT NATIONAL MEMORIAL

INTRODUCTION

Interpretive themes and objectives and three alternatives have been developed for managing General Grant National Memorial. Alternative 1, the no-action/continuation of existing management alternative, would continue current site management. Alternatives 2 and 3 present different management options and site uses. General Grant National Memorial contains unique resources that would be protected and interpreted under any of the alternatives.

Interpretive Themes

The interpretation of the site would focus on the history of Grant's role in the Civil War and as president of the United States. Additionally, the memorial would be interpreted as a reflection of the reverence of the American people who honored Grant as the savior of the Union. The following primary themes would be used to interpret the site:

- Although his earlier ambitions were not in military service, Grant rose to commander-in-chief of the U.S. Army through his flexibility as a general and his innovative and aggressive military strategies during the Civil War.

- Punctuated by controversy, the policies and actions of President Grant's administration continue to have impact on American society today. Actions including the Reconstruction and reassimilation of the South into the Union, the destructive wars of the native people of the plains, and the establishment of the civil service and the first national park are still remembered today.

- Grant has had an enduring relationship with the African American community with his support of emancipation, his efforts during Reconstruction to improve opportunities for African Americans, and his signing of a comprehensive civil rights act. This relationship was reaffirmed through the significant contribution of the African American community in the motivation and fund-raising for the memorial.

- General Grant National Memorial, with its architectural design modeled after the tomb of King Mausolus at Halicarnassus, was constructed to honor the man who brought the Civil War to an end and remains a memorial to his beliefs and memory.

The difference in the interpretation of these themes in the following alternatives would be the depth of interpretation, and the media and staff availability. Alternative 3 would be the most in-depth interpretation through expanded exhibits and facilities; alternative 1 would have the least in-depth interpretation.

Visitor Experience

The National Park Service has the following goals for visitors.

- Visitors could learn the history of General Grant National Memorial through the interpretation of the themes and the changes and additions to the site that represent the continuing memorialization of Grant.

- Visitors could help conserve the structure and collections because they would be aware of their importance and fragility.

- Visitors could learn about the importance of the survival, preservation, and protection of Grant's tomb and other such sites and the National Park Service's role in such efforts.

- Visitors could learn about the National Park Service's mission through onsite interpretive programs and community outreach.

- Visitors could benefit from interpretive and cultural programs, achieved through cooperation with various civic, historical, and cultural groups, that promote an appreciation of General Grant National Memorial and nearby historical resources.

ACTIONS COMMON TO ALL ALTERNATIVES

An overnight guard service would be maintained, providing security services to the site and surrounding plaza. A friends group would be established with interested individuals, organizations, and educational groups to maintain the quality of the site, supplement the interpretive program, and organize appropriate commemorative events. The National Park Service would work closely with the Grant family, Civil War groups, local organizations, and the management of other park areas commemorating Grant to supplement the interpretive program. These groups would also be consulted in the organization and implementation of appropriate commemorative activities. Grant's presidential role would be commemorated by installing a presidential flag.

Updated brochures and a site handbook would be available at the site. A kiosk with multilingual information outside of the structure would provide a brief history of the site, a map and location of the other Manhattan Sites, and schedules of site tours and special events. The kiosk would be accessible to mobility impaired visitors. The kiosk design would be compatible with the tomb's setting and context.

The area around the tomb would continue to be available for recreational activities.

All museum collections would be stored on the third floor of Federal Hall National Memorial, which is being improved and will have room for conservation work. Ultimately, the collections for General Grant and Hamilton Grange would be stored at the relocated and rehabilitated Hamilton Grange.

The period of significance of the site would be reevaluated, and national register nominations would be revised.

Positive communication with the surrounding communities would continue.

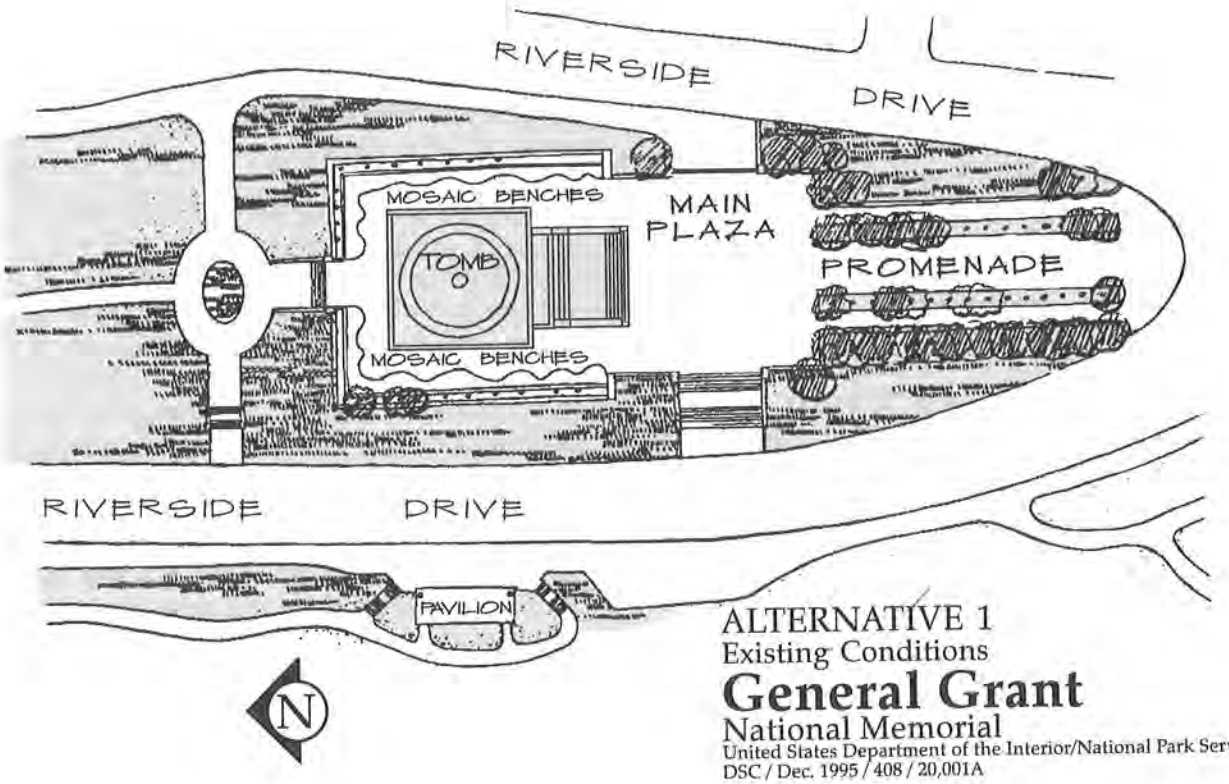
Maintenance facilities and procedures would be improved and regularly implemented. Periodic maintenance of interior finishes would continue.

For mobility-impaired visitors, access to the main level of the structure would be provided by installing a chairlift to the sidewall of the stairs to the tomb, ramps, and accessible doors. The other levels would remain inaccessible; however, these areas would be programmatically interpreted — meaning through displays, text, photos, interpretive video tour, or other media.

ALTERNATIVE 1: NO ACTION / MINIMUM REQUIREMENTS

Alternative 1, which would meet minimum requirements, would result in few changes to the tomb and the site (see General Grant, Alternative 1 — Existing Conditions map). Under this alternative, emphasis would be placed on the preservation and maintenance of the structure and associated site, as well as the interpretation of Ulysses S. Grant and the tomb.

Although no substantial changes would occur to the structure, preservation efforts would continue to correct current and prevent future structural and material deterioration.



ALTERNATIVE 1
Existing Conditions
General Grant
National Memorial
United States Department of the Interior/National Park Service
DSC / Dec. 1995 / 408 / 20,001A

Along with the chairlift, ramps, and accessible doors into the main level, the viewing circle to the sarcophagi would be adjusted (perhaps by a mirror or platform that could be raised or lowered) to allow views for visitors in wheelchairs. Displays, text, photos, or perhaps some sort of interactive video tour could be done of the areas of the tomb that would remain inaccessible to visitors with disabilities.

Updated exhibits would be developed for the entry level lobby area, and the reliquary rooms would continue to be restored. Interpretation, through exhibits and ranger-led and self-guiding tours, would convey Grant's role in the Civil War and the preservation of the Union, his humanitarian role during Reconstruction, and America's need to memorialize its leaders, including the fund-raising effort led by Richard T. Greener.

The site and its uses would continue as they currently exist. The information and sales desk would remain inside of the tomb near the front door, and the staff offices would remain in the southeast corner on the main level and on the sarcophagi level. Maintenance equipment would continue to be stored in the southwest stairwell closet area. There would be no public restrooms at the site, but the National Park Service would coordinate with the city to provide limited facilities in Riverside (Claremont) Park.

The mosaic sculptured seating would be maintained along the terrace wall. The National Park Service would continue to work with the city's Department of Parks and Recreation in providing for the maintenance and security of the plaza area, which would include the continued prevention of graffiti and vandalism.

Programs such as the Jazzmobile and Gospelfest would continue in the plaza area.

Under this alternative, the structure would be managed as a historic zone. The staffing required for this alternative would continue to be eight full-time employees, and the annual operational costs would be about $558,000. This alternative would be the least costly of the three alternatives (see appendix C), requiring about $510,000 for implementation and interpretation.

ALTERNATIVE 2: RESTORATION OF THE SITE TO ORIGINAL DESIGN

This alternative is based on the period of significance being the late 1890s. If, after reevaluation, the period of significance is determined to be other than that, some of the following proposals might have to be adjusted.

Alternative 2 would involve be a complete restoration of the mausoleum and its site to the original design of architect John H. Duncan (see Alternative 2, Restoration of Site to Original Design drawing) and would involve two options. One option would be to modify the memorial to the original plan as designed; the other option would restore the memorial to the way it was actually constructed. There is little difference between these two options, involving only the creation and installation of exterior statuary.

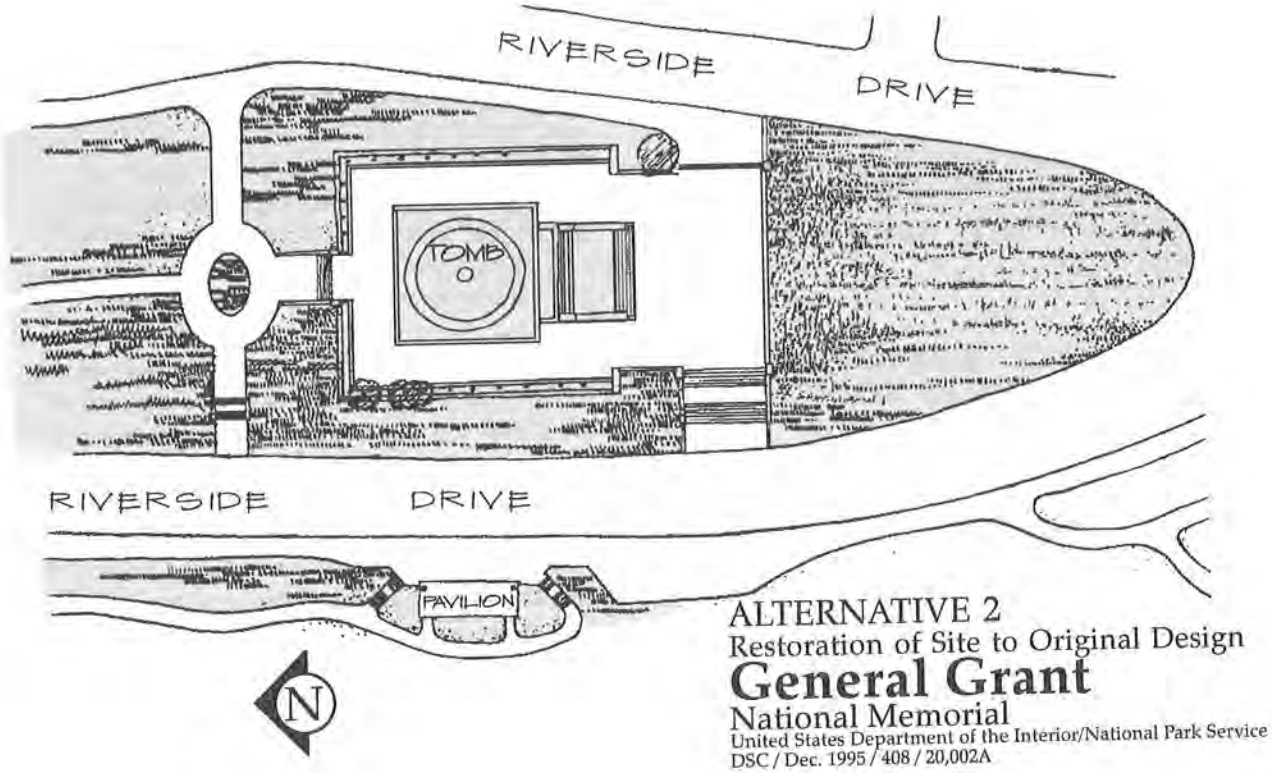
This alternative would focus on the visual appearance and design intent of the structure and the site. Both of these options would include the removal of any embellishments that have occurred since the tomb was completed in 1897, including the 1938 additions of the Works Progress Administration, which may be historic themselves, and the changes that have occurred since NPS acquisition of the site in 1959. Architectural or structural changes to the internal infrastructure to enhance the physical condition of the structure that are not visually apparent (e.g., the internal reroofing to prevent leaking) would not be reversed.

Under this alternative, the solemnity of the tomb would be restored. Substantial historical research would be required to correctly restore the mausoleum and be in conformance with NPS policies and the *Secretary of Interior's Standards for the Treatment of Historic Properties.*

Within the interior of the tomb, several changes would be implemented. The entry would be recreated with the double set of bronze doors and the wooden vestibule. On the main level, the southwest staircase leading up to the second floor would be rehabilitated, requiring the removal of the maintenance and custodial space and equipment. The southeast corner office space would be removed, and the staircase that originally existed to provide egress from second floor would be rebuilt to match the southwest stair. On the sarcophagi level, the doors leading to the office space would be covered and returned to wall space. The office would be accessed through the original trap door from the first floor.

The window treatment throughout the interior would be returned to the original design of clear glass with purple silk draperies. The amber glass and Tiffany frames would be removed. The walls would be painted white, which would cover the 1938 murals in the reliquary rooms and the 1968 murals in the lunettes. The original use of the reliquary rooms would be reinstated by reconstructing the bronze flag cases and posting period memorabilia. All interior statuary would be removed from the main staircase and the niches on the sarcophagi level. The sales and information desk would be removed, as would all interpretive exhibits throughout the tomb.

The exterior of the structure, as well as the surrounding site, would undergo several changes. The roof of the tomb, which was originally brick and contained a skylight, would be rebuilt to resemble the original design. Under the second option of this alternative, statuary would be placed on the apex of the roof and at other exterior areas.



ALTERNATIVE 2
Restoration of Site to Original Design
General Grant
National Memorial
United States Department of the Interior/National Park Service
DSC / Dec. 1995 / 408 / 20,002A

The National Park Service would acquire sufficient interest in the area immediately surrounding the tomb (less than 2 acres) to allow for the restoration of the historic landscape, including the entire ellipse, the temporary tomb site and paved plaza area (which would be replaced by grass). This would require a boundary adjustment, which would also facilitate operational and management issues that pertain to park administration and visitor use at the site (*Special Directive* 92-11, 2a). The trees planted in the 1930s by the Works Progress Administration would be removed. The mosaic sculptured seating along the terrace wall would be relocated to Claremont Park, just north of the tomb, and the eagle statues, the flagpole, and the exterior lighting would be removed.

The National Park Service would work closely with the city to provide clean and safe public restrooms at adjacent Riverside (Claremont) Park and ensure that public use of Riverside Park surrounding the tomb would be appropriate to the solemnity of the site. All events that are perceived as non-commemorative (e.g., the Jazzmobile) would no longer occur at the site or plaza area.

Interpretation would be primarily through guided tours, interpretive talks, a site handbook, and a brochure to describe General Grant's role in American history.

Along with the chairlift, ramps, and accessible doors into the main level, displays, text, photos, or perhaps some sort of interactive video tour would be done of the areas of the tomb that would remain inaccessible to visitors with disabilities.

All staff space would be within the current office space on the sarcophagi level. Maintenance and custodial equipment would be relocated to the second floor.

Under this alternative, the structure would be managed as a historic zone. The staffing for this alternative would be the same as alternative 1, with eight full-time employees, and the annual operational costs would also remain at about $558,000. This alternative would cost more than alternative 1 but less than alternative 3 (see appendix C), requiring about $3.9 million for implementation and interpretation.

ALTERNATIVE 3: PROPOSED ACTION — THE CONTINUUM OF GRANT MEMORIALIZATION

This alternative is based on the period of significance being the late 1890s. If, after reevaluation, the period of significance is determined to be other than that, some of the following proposals might have to be adjusted.

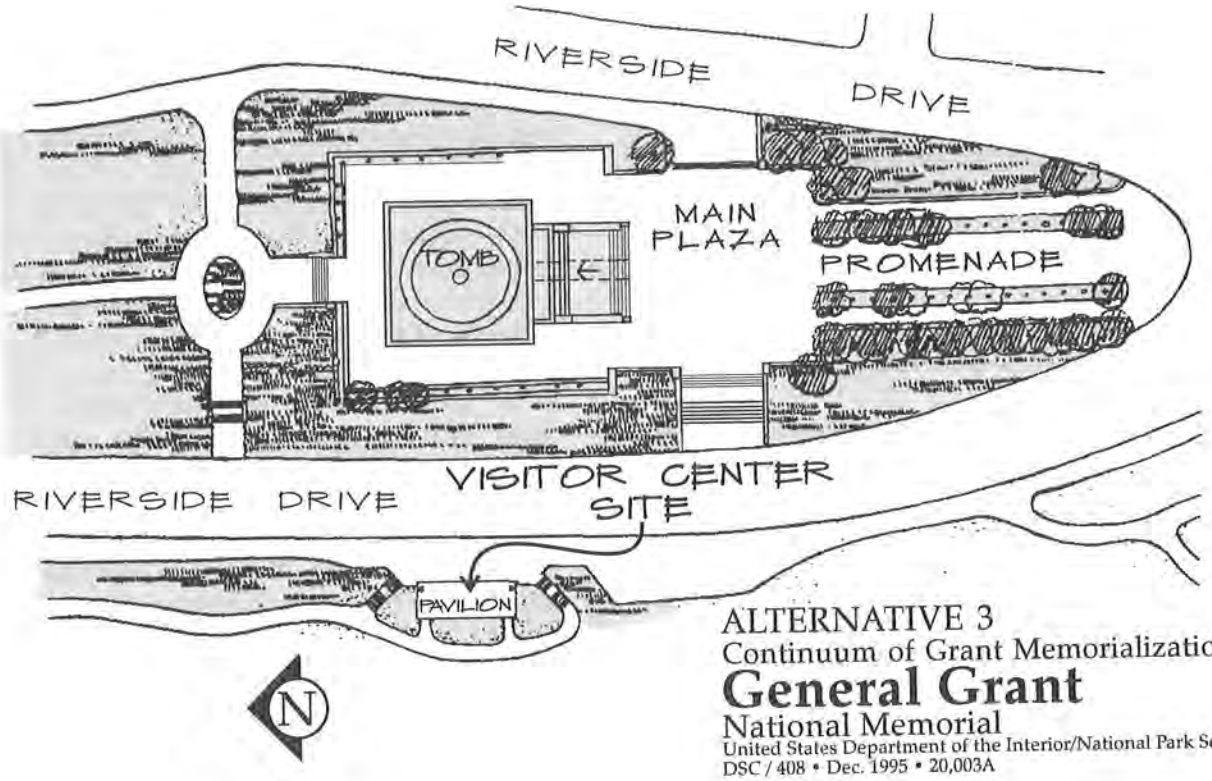
Under this alternative the structure and site would not be restored to any specific historic period but would continue to represent a continuum of commemorations to the life, career, and achievements of Grant. The embellishments added to the tomb over time would be preserved and maintained. This alternative also includes the transformation of the overlook pavilion west of the tomb across riverside Drive into a visitor center (see Alternative 3, Continuum of Grant Memorialization drawing). Although various options for the visitor center location were considered (see "Alternatives Considered but Rejected" section), the pavilion was selected as the most resource-conservation-oriented and economical location). The new visitor center and the relocation of the ranger contact station and sales desk would restore the tomb as a commemorative and solemn space.

The ellipse area, including the plaza and temporary tomb site and the overlook pavilion, would, subject to discussions with the city, be transferred to the National Park Service. (The total area would be less than 2 acres.) Depending on the terms of such a transfer, a boundary adjustment might be required. If a boundary adjustment occurs, it would facilitate operational and management issues that pertain to park administration and visitor use at the site (*Special Directive 92-11*, 2A and 2C). Following approval of this plan, the National Park Service would initiate discussions with the city to acquire sufficient interest in these areas to allow for NPS improvements and management.

Space for the visitor center would be about 3,000 square feet. The pavilion's upper level would be transformed into the information and sales desk area, which would be removed from the tomb, and have some interpretive exhibits. An elevator would be installed to access the lower level restrooms, multiuse interpretive space, and staff and maintenance space. A distinctive crosswalk paving and a demand-operated traffic light would be installed to ensure safe crossing (across Riverside Drive) to the pavilion. The elevator would make the visitor center accessible to visitors with disabilities. The improved site and new visitor center would probably cause an increase in visitation.

The administration of Riverside Park indicated the city's interest in restoring the pavilion as a visitor center, in conjunction with the National Park Service. Similarly, one of the community boards (Community Board 9) is in favor of an NPS visitor center at the pavilion.

Although no substantial changes would occur to the memorial structure, structural and material deterioration would be corrected through rehabilitation efforts. Some of the appropriate design intents for a mausoleum would also be honored. For example, the interior amber glass windows would be replaced with purple glass, which was the funerary color for honor and the original color scheme for the tomb, to restore the somber purple hue. The reliquary rooms would be returned to their original design



ALTERNATIVE 3
Continuum of Grant Memorialization
General Grant
National Memorial
United States Department of the Interior/National Park Service
DSC / 408 • Dec. 1995 • 20,003A

intent, which was to memorialize Grant's military achievements with flags and other memorabilia. The marble floor on the sarcophagi level would eventually need to be replaced.

The mosaic sculptured seating would receive preservation treatment and be maintained in its current location, if practicable. If not, it would be reinstalled in the Claremont section of Riverside Park.

Along with the chairlift, ramps, and accessible doors into the main level, the viewing circle to the sarcophagi would be adjusted (perhaps by a mirror or platform that could be raised or lowered) to allow views for visitors in wheelchairs. Displays, text, photos, or perhaps some sort of interactive video tour of the areas of the tomb that would remain inaccessible to visitors with disabilities could be available at the visitor center. This could be done as part of the site brochure, and useful for after-hour visitors or visitors who stop at the visitor center and want to see if they want to go into the tomb.

The traditional community uses (e.g., the Jazzmobile and Gospelfest) of the plaza would continue.

Security at the site would be enhanced by a fence erected around the perimeter of the tomb site and the addition of appropriate security lighting. The fence and lighting equipment and installation would be designed to be compatible with the tomb and the historic landscape of surrounding Riverside Park.

Under this alternative, the tomb structure would be managed as a historic zone and

the visitor center structure would be managed as a park development zone. The staffing for this alternative would require 12 full-time employees and annual operational costs of about $675,000. This alternative would be the most expensive to implement of the three alternatives proposed for General Grant's tomb, requiring about $5 million for implementation and interpretation.

ALTERNATIVES CONSIDERED BUT REJECTED

The following two visitor center sites were considered but rejected because the locations and types of visitor centers were not favorably received by the public.

A visitor center was proposed underground below the plaza in front of the tomb. Access would have been by an elevator and stair in a small kiosk on the plaza. With minimum intrusion, the center could also be connected directly to the lower, sarcophagi level, thereby permitting entrance to the tomb by mobility impaired visitors. However, based on public review of draft alternatives, this alternative was rejected because an underground structure was not desirable.

An aboveground visitor center behind the tomb was also considered. A parking lot would have been constructed to accommodate tour and school buses. An amphitheater could have been constructed to accommodate summer entertainment programs such as the Jazzmobile that now occur on the plaza. This option would have eliminated the impact of these programs on the tomb while continuing to meet community needs. This alternative was rejected because of the amount of park area that would have been required for the visitor center and associated parking lot and because the public did not want parkland converted into a parking area.

TABLE 7. SUMMARY OF ALTERNATIVES FOR GENERAL GRANT'S TOMB

	ACTIONS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2	ALTERNATIVE 3 — PROPOSED ACTION
Site	Overnight guard service would be provided.	Few changes to site. Emphasis would be on preserving and maintaining structure and site, as well as interpreting Grant and the tomb. Mosaic sculptured seating would be preserved in existing location.	Would focus on visual appearance and original design intent of structure and site, including the removal of external embellishments that have occurred since completion (1897). The solemnity of the tomb would be restored. The Park Service would cooperate with the city for sufficient interest of area around tomb for restoration of historic landscape (including removal of trees). Mosaic sculptured seating would be relocated nearby.	Would continue to present a continuum of commemorations of life, career, and achievements of Grant. Separate visitor center would be established using pavilion west of the tomb across Riverside Drive. The Park Service would work with the city to acquire the pavilion and land west across Riverside Drive for this use and to acquire the ellipse area, including the plaza and temporary tomb site north of the tomb (total acquisition less than 2 acres). Mosaic seating would be preserved in existing location, if practicable, or reinstalled in Riverside Park.
Structure(s)	Periodic maintenance of interior finishes would continue. Maintenance procedures would be improved and regularly implemented.	No substantial changes; preservation efforts would continue to correct current and prevent future structural and material deterioration.	Restore mausoleum and site to original design by either modifying memorial to the original plan or to the way it was constructed, including double set of doors and vestibule, window replacement, painted walls, original use of reliquary rooms, and the removal of some interior statuary and the information and sales desk. Exterior would also undergo some changes, including rebuilding the roof.	No substantial changes; rehabilitation efforts would continue to correct current structural and material deterioration and honor some original design intents (including windows and reliquary rooms). Structure would not be restored, and added embellishments would be retained and preserved. Pavilion west across Riverside Drive would be restored and transformed into visitor center.
Access	Chairlift, ramps, and accessible doors would provide access into the main level; other levels would remain inaccessible. Programmatic accessibility would be used.	Viewing circle to sarcophagi would be adjusted for visitors in wheelchairs.		Same as alternative 1; also, visitor center, across Riverside Drive via traffic light, would be accessible to all visitors via an elevator.
Exhibits and Interpretation	Updated brochures and site handbook would be available. Outside kiosk, accessible to mobility impaired visitors, would provide multilingual information, history, map, and schedules of tours and events.	Updated exhibits for entry level lobby area; reliquary rooms would continue to be restored. Interpretation, through exhibits and range-led and self-guiding tours, would convey Grant's role in Civil War and the preservation of the Union, his humanitarian role, and America's need to memorialize its leaders.	All interpretive exhibits in the tomb would be removed. Interpretation would be primarily through guided tours, interpretive talks, a site handbook, and a brochure.	Exhibits would be moved to pavilion visitor center. Lower level of pavilion would have multiuse interpretive space.

	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2	Alternative 3 — Proposed Action
Visitor Use and Space	Area around tomb would continue to be available for recreational activities.	Continue use as is. No restrooms would be provided, but Park Service would negotiate with city to provide facilities in Riverside Park. Programs such as Gospelfest and Jazzmobile would continue in plaza area.	The Park Service would work closely with city to provide restrooms at Riverside Park and ensure that public use of Riverside around the tomb would be appropriate to site solemnity. Noncommemorative events (e.g., the Jazzmobile) would not be permitted.	Information and sales desk relocated to new visitor center. Lower level of pavilion would have restrooms. Visitation would probably increase. Traditional uses (Jazzmobile and Gospelfest) would continue.
Collection	Ultimately, collection would be stored at Hamilton Grange; interim storage would continue at Federal Hall.			
Outreach	Continued positive communication with surrounding communities. Friends group would be created to supplement interpretive program and organize events. Park Service would work closely with Grant family, Civil War groups, local organizations, and management of other park areas commemorating Grant to supplement interpretive program.			
NPS Operations	Overnight security service would continue to prevent vandalism and graffiti.	Park Service would continue to work with city in providing for maintenance and security for plaza area, including the prevention of graffiti and vandalism. Staff offices would continue in existing space; existing operations would continue.	Staff offices would continue in existing space. Maintenance and custodial equipment moved to second floor.	Site security would be enhanced by a fence around the perimeter and addition of lighting.
Boundary Adjustments		None required.	Required for ellipse, including plaza area and temporary tomb site.	Might be required for ellipse, including plaza and temporary tomb site, and pavilion.
Staffing		8 full-time employees	8 full-time employees	12 full-time employees
Annual Operating Costs		$558,000	$558,000	$675,000
Implementation Costs (including interpretation)		$510,000	$3,884,000	$5,155,000

TABLE 8. SUMMARY OF IMPACTS FOR GENERAL GRANT'S TOMB

TOPIC	ACTIONS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2	ALTERNATIVE 3 — PROPOSED ACTION
Impacts on Cultural Resources				
Impacts on Historic Structures	Providing accessibility to main level for visitors with disabilities might impact some historic fabric.	No additional negative impacts; repair work would improve overall condition. No impacts on mosaic sculptured seating.	Restoration to 1897 appearance would impact subsequent (possibly historic) alterations and possibly structure integrity; would also impact mosaic sculptured seating because of their relocation; however, impacts would be mitigated by relocating the seats nearby.	Relocation of visitor contact and sales desk would allow tomb to function as commemorative place. Site rehabilitation would lead to long-term preservation of building and historic elements. Restoration of the 1910 pavilion would be a positive impact on the overall preservation of the structure. Mosaic seating would receive preservation treatment and be maintained on terrace, if practicable. If trees inhibit preservation treatment, seating would be relocated to the Claremont section of Riverside Park and preservation treatment would continue.
Impacts on Museum Collections	Some positive short-term impacts; long-term beneficial impacts of being stored near the site in appropriate conditions.			Also, exhibits in visitor center would be in climate-controlled secure space. Exhibits in reliquary rooms would not be in climate-controlled conditions.
Impacts on Ethnographic Resources		No impacts on Jazzmobile, Harlem Week, Gospelfest, etc.; associated parking problems and litter would continue during events. Events would provide cultural awareness of site and promote goodwill. Positive impact on Grant's descendants through continued preservation and maintenance of structure.	Negative impact on surrounding community and patrons of traditional activities such as the Jazzmobile, Gospelfest, and Harlem Week.	Same as alternative 1. Also, visitor center construction would not impact any ethnographic resources associated with that site.

Topic	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2	Alternative 3 — Proposed Action
Impacts on Historic Landscape and Riverside Park		No impacts on landscape or area residents	If done, restoring plaza area and area just north of tomb would significantly impact landscape of Riverside Park as well as area residents (because of the loss of the sycamore trees and natural setting). Would negatively impact 1930s landscape design and current visual setting and feeling.	Tomb area landscape would not be affected. Visual scene of pavilion area might be impacted depending on final design of visitor center. This impact would be mitigated by compatible design of center.
Impacts on Archeological Resources		No impacts would be likely.	Archeological survey before construction would help avoid negative impacts on potential archeological resources.	Archeological survey and monitoring activities would avoid negative impacts on potential archeological resources in pavilion area or activities connected with the security fence and lighting.
Impacts on Natural Resources		No short- or long-term impacts.	No impacts on water resources, soils, or air quality; potentially significant impacts on vegetation, wildlife, and wildlife habitat because of the removal of old-growth trees and other vegetation.	No significant impacts on natural resources, including vegetation, air quality, water resources, and soils. Some wildlife species might be affected on a short-term basis by roof/exterior restoration; however, impacts would be mitigated. Visitor center renovation would impact already disturbed soils.
Impacts on Floodplains	No impacts.			
Impacts on Threatened or Endangered Species		No new impacts on any threatened or endangered species.	If biological assessment shows that impacts would threaten existence of peregrines in area, removal of trees and vegetation would not be an option. Construction activities could have significant temporary impacts on peregrines; mitigation measures would provide protection to peregrines during construction.	Exterior roof repairs could affect peregrines for short term. Mitigation would provide protection to these individuals during project activities and minimize disturbance to vegetation. Surveys for threatened or endangered species on the hillsides next to the pavilion would avoid impacting unknown species in this area.
Impacts on Coastal Zone Management	With required concurrence, no impacts.			

Topic	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2	Alternative 3 — Proposed Action
Impacts on Regional Land Uses and Visitor Facilities		No impacts.	With NPS acquisition of plaza and temporary tomb site land, city would be relieved of some of the maintenance responsibilities and costs in Riverside Park.	NPS acquisition of ellipse area and pavilion land for visitor center would be beneficial for National Park Service and city, area residents, and area aesthetics, while lessening city costs and maintenance responsibilities.
Impacts on Socioeconomic Environment		No impacts.	Redevelopment/construction activities and potential increases in visitor use might indirectly result in local retail sale increases while promoting employment opportunities and the stimulation of new businesses; however, construction dollars for this redevelopment would be relatively small. Removal of events (such as the Jazzmobile) might impact local businesses who provide goods or services. Vendors would likely not be impacted.	Rehabilitation/construction activities and potential increases in visitor use might result in local retail sale increases, employment opportunities, bus tours, and the stimulation of new businesses; however, the construction dollars for implementing this alternative would be relatively small.
Impacts on Visitor Use and Interpretation	Updated brochures and handbook and outside kiosk would enhance visitor experience, especially with multilingual information.	Updated interpretive program (revised exhibits and site booklets, ranger talks and occasional costumed interpretation) would improve interpretation and visitor experience. Site themes would not be fully interpreted. Contact desk and book sales would stay in tomb, which would continue to impact solemnity. There would be no onsite restrooms.	With personal interpretive services, site's history would be conveyed — a positive impact on visitor's understanding and appreciating the tomb. Site solemnity would be more consistent without events such as the Jazzmobile, although there would be a loss of established uses, and with the removal of the information and sales desk. Removing trees would adversely impact the natural setting and thus the visitor's experience of being in a natural setting and having shade trees. Interpretation would be somewhat improved over alternative 1 but still limited to printed materials and talks as available and less in-depth coverage of the themes than in alternative 3. Possible short-term increase in visitation; long-term use would not likely increase much.	With visitor center and restrooms, visitor experience would be improved. Quality and quantity of interpretive information would be expanded. Visitation to site would likely increase. In-depth coverage of all themes would be provided, which would enhance visitor experience.

Topic	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2	Alternative 3 — Proposed Action
Impacts on Transportation and Parking		No impacts.	No impacts.	Increased visitor use could negatively impact local traffic patterns, especially on Riverside Drive near visitor center. Lack of parking for buses and cars would also become an issue. Traffic would be impacted temporarily during construction.
Impacts on NPS Operations	Overnight security services would continue to deter vandalism and graffiti.	No change. Maintenance space would continue to be inadequate. There would be no onsite restrooms.	There would be no onsite restrooms. NPS staff would have more area to maintain.	Onsite restrooms would be provided. Slightly expanded maintenance area would help site staff. More staff would be needed, and thus available for interpretation. Fence would help with site security.
Cumulative Impacts		Rehabilitation and maintenance would help preserve structure and site. Security would continue to deter crime, vandalism, and graffiti, and site would be more welcoming. Combined with other potential new parks and development in vicinity, visitors might be encouraged to stay an added day to see sites in Harlem area, which would bring in revenue and promote partnerships between the community, agencies, and private businesses.	If done, removing vegetation cover would contribute to the human-caused decline of forest community on Manhattan Island and could over the long term impact wildlife species using this vegetation. Proposed land transfer from city, combined with other land transfers recommended for other Manhattan Sites, could be seen as a loss of city-owned open space and facilities in three community districts who have high priorities for open space. However, land would still be available for recreational use and transfers would also relieve city of some maintenance costs. Development at the tomb, combined with Strivers Center Project and Harlem Pier if promoted, could help stimulate tourism and economic benefits in Harlem area. Costs incurred for added police protection, street cleaning, and promotional efforts.	Proposed land transfer from city, combined with other land transfers recommended for other Manhattan Sites, could be seen as a loss of city-owned open space and facilities in three community districts who have high priorities for open space. However, land would still be available for recreational use and transfers would also relieve city of some maintenance costs. The development at the tomb, combined with the Strivers Center Project and Harlem Pier if promoted, could help stimulate tourism and economic benefits in Harlem area. Costs would be incurred for added police protection, street cleaning, and promotional efforts.

Topic	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2	Alternative 3 — Proposed Action
Unavoidable Adverse Impacts / Relationship between Short-term Uses and Long-term Productivity / and Irreversible and Irretrievable Commitment of Resources	Some interior fabric would be irreversibly and irretrievably lost to provide access for visitors with disabilities.	No additional impacts.	Irreversible and irretrievable commitments of cultural and natural resources would occur in restoring the 1897 appearance. Removal of mosaic seats, and internal historic fabric would be irreversible and irretrievable commitment of resources. Historic 1930s landscape would be permanently altered. Ground-disturbing activities might result in irreversible and irretrievable impacts on archeological resources; these could be mitigated through monitoring. Impacts on vegetation, wildlife, and wildlife habitat would be irreversible and irretrievable.	Site rehabilitation would contribute to the long-term preservation of the mausoleum and its structural fabric and historic elements. There could be irreversible and irretrievable change in the scenic view in pavilion area, which would be mitigated by careful design. Restoration work for mausoleum roof could impact peregrines on a short-term basis; however, prescribed mitigation would ensure minimal disruption to peregrines as a result of project activities.

CULTURAL RESOURCES

A History of Ulysses S. Grant

Ulysses Simpson Grant, 18th president of the United States (from 1869-77), was born Hiram Simpson Grant on April 27, 1822, at Point Pleasant, Ohio, to Jesse R. Grant and Hannah Simpson Grant. In 1823 the Grant family moved to Georgetown in Brown County, Ohio. Grant remained here until the age of 17 (in 1839) when he left for study at West Point, where his name was changed to Ulysses. Grant did not like the army and had no intention of remaining in the service. Instead, he wished to finish his course work and become a professor. Grant did have some interest in the cavalry, or dragoons as they were known at that time. However, he ended up in the infantry and in 1843, with a recorded distaste even for the uniform, he reported for duty at Jefferson barracks, St. Louis, Missouri, on September 30th.

Grant served under Gen. Stephen Watts Kearney in St. Louis. While serving in the army, Grant made his first trip to White Haven, home of the Dent family of Missouri, between September 1843 and May 1844. Here he met Julia Dent, whom he married on August 22, 1848. Grant was sent to Fort Jessup, Louisiana, for his first tour of duty outside St. Louis; the troops were sent as observation personnel concerning the annexation of Texas. Later he served in the Texan Army of Occupation and in the Mexican War, both under Gen. Zachary Taylor and Gen. Winfield Scott. He returned from the war wiser in the ways of the military but continued to remain individual and opinionated. His views concerning the Mexican War echoed the feelings of many Americans of the day when Grant later said that even if the annexation of Texas could be justified, the manner in which the subsequent war was forced upon Mexico could not. Beginning the war as a second lieutenant, he was promoted to first lieutenant shortly before the invasion of Mexico City.

Grant returned to the United States after the Mexican War and served at Sackett's Harbor in New York and at Detroit. In July 1851 Grant left for Panama as regimental quartermaster, as part of an American military expedition. By September 1852 he was in San Francisco. After that Grant served at various posts on the Pacific Coast; he was promoted to captain while serving at Humbolt Bay, California.

In 1854, at the age of 32, Grant rejoined his wife and newborn son outside St. Louis on the family farm. He worked until 1858 when he sold the farm and went into the real estate business with his wife's cousin in St. Louis. Here he became active in politics, moving from Whig and Free-Soil Democrat sympathies briefly to the American Party, a nativist political movement. Grant was initiated, attended one meeting, and never went back, according to his recollections. He first voted in a presidential election in 1856, for James Buchanan.

Grant lived for 11 months in Galena, Illinois. Residency requirements prohibited him from voting in the presidential election of 1860. In St. Louis, Grant drilled with the "Wide-Awakes," Republicans who were preparing to fight against a southern secession movement. Upon the outbreak of the war, his company was incorporated into the 11th Illinois volunteer infantry. Grant involved himself in mustering state regiments through the state's adjutant general's office. In 1861 he, along with William Tecumseh Sherman, witnessed the takeover of the state militia at Camp Jackson, Missouri, outside St. Louis by Frank Blair, Capt. Nathaniel Lyon, and other Union sympathizers.

Grant was appointed colonel of the 21st Illinois, a regiment mustered by Grant at Mattoon, Illinois. Illinois citizens

recommended Grant for a position of brigadier general, which he received. Serving initially at Ironton and Jefferson City, Missouri, Grant was later given command of southeast Missouri. The war escalated and Grant became more involved and more confident in his military skills.

Grant's first major campaign exhibited all the qualities that became his trademark. He was ordered to transport 15,000 troops, accompanied by naval gunboats, down the Tennessee River to secure Fort Henry. Upon arriving, Grant found that rains and ensuing floods had made Fort Henry indefensible, and the Confederate troops had concentrated at Fort Donelson to the east. Grant immediately focused on Fort Donelson and, through aggressive command of his troops, defeated the Confederate troops. This battle set a precedent for Grant's military career. He recognized and seized the initiative, remaining aggressive throughout the campaign.

Upon a request for an armistice by the Confederate Gen. Simon B. Buckner, Grant replied that no terms except an unconditional and immediate surrender could be accepted. Heralded as a major victory for the North, Grant was immediately appointed major general of volunteers by President Lincoln and the Senate.

The Battle of Shiloh proved to be a personal defeat for Grant. A vicious Confederate assault caught Grant unprepared and his troops without field fortifications. His troops suffered massive losses and were forced to yield ground. However, reinforcements arrived through the troops commanded by Brig. Gen. Don Carlos Buell. Grant was able to use these troops to regain ground and defeat the Confederate forces. Although this battle was a Northern victory, Grant's reputation had suffered and he considered resigning from the army. Sherman dissuaded Grant from leaving the army, and in time he regained confidence and his composure.

His military career reflourished with displays of his innovativeness as a general and his flexibility in trying new strategies. Through his vigor and intellect in battles such as Vicksburg, he built confidence from his troops and President Lincoln. He steadily rose in rank. Although he experienced setbacks, his command of battle was steadfast.

In 1865 General-in-Chief Grant faced several difficult and challenging battles against the troops of Gen. Robert E. Lee. Both sides suffered massive losses at Wilderness and Spotsylvania. Although Grant did not succeed in forging through the Confederate troops to Richmond, the series of battles had weakened Lee's forces and they did not again assume the offensive. The Northern victory at Five Forks marked the beginning of the end of the Civil War. Lee's army abandoned Petersburg and Richmond, intending to join Gen. Joseph Johnston's army. Grant paralleled the march, and Sheridan's calvary cut off Lee's troops at Appomattox Court House. On April 9, Lee surrendered the Army of Northern Virginia to Grant.

From the beginnings in the western theater to the end of the Civil War, Ulysses S. Grant's military career brought him national acclaim — and ultimately to the American presidency.

Grant's views concerning Reconstruction in the years following the Civil War allowed radical Republicans more freedom to pursue their agendas than under the previous Johnson administration. He opposed Andrew Johnson's suggestion that Lee be tried for treason, reminding him of the terms of the Appomattox surrender. His 1865 tour of the South met with more support than was expected, and at that time his policies concerning Reconstruction remained liberal. In 1866 Congress made him General of the Armies of the United States. Soon after, he broke with President Johnson, having taken the post as secretary of war upon Johnson's dismissal of Edwin M. Stanton. He resigned in 1868 to run for president. The last line of his acceptance letter for his presidential nomination in Chicago in 1868, "Let Us Have

Peace," became the Republican motto of the day. At age 46 Grant was elected as the youngest president up to that time. He had only once before voted for a president, that being James Buchanan.

Grant's attitudes towards nonwhite populations remained positive yet ambivalent and contradictory at times. He named Ely Parker, a Seneca and his former staff officer, as the first commissioner of the Bureau of Indian Affairs while pursuing a policy of active subjugation of American Indian people during the post-Civil War Indian campaigns. On the subject of blacks, however, he supported the more conservative Republican agenda. He entertained expatriate views, including the acquisition of Santo Domingo, as a possible partial solution to race problems. Santo Domingo could be acquired as a state of the Union, said Grant, but its populations would be nonwhite. Grant remained a man of his time — while he supported emancipation and an end to slavery, the attendant sociological questions of the place of black people in American society remained unresolved in his mind.

The Grant years included reform as well as controversy. The first black congressman in the history of the nation, Hiram Revels, and the first black Senator, Blanch Kelso Bruce, took their seats in Congress. The 15th amendment was passed. Victoria C. Woodhull addressed Congress on the suffrage of women. Congress created the Civil Service Commission in an attempt to prohibit abuse of positions in the federal government. Under his administration, Yellowstone became the first national park. The Grant administration also continued warfare on the western plains with native peoples and engagements such as the one at the Little Bighorn between the Sioux and American forces in June 1876.

Grant's presidential administration, however, is best remembered for its postwar upheaval, political intrigue, and scandal. His command in the field had proved forthright and decisive; his decisions as president remained less so. His election in 1868 and reelection in 1872 marked the end of Lincoln's moderate Republican policies as Grant became more attentive to the realizations of more radical wings of the party. Grant's presidency was plagued by domestic and economic issues that presented themselves against a backdrop of aggressive business and political intrigue. One situation ultimately led to Grant's own family — his brother-in-law, A.E. Corbin, and his part in the Gould/Fisk "Black Friday" stock market collapse on September 24, 1869. The Credit Mobilier scandal of 1872 also brought discredit, and the Whiskey Ring Scandal of 1875 ultimately caused President Grant to address Congress stating that his mistakes had been "errors of judgement not of intent."

After his presidency, Grant retired, traveling around the world. He wrote a series of articles for *Century Magazine* concerning his Civil War reminiscences. Grant entered into the banking business on Wall Street. The business failed, and he proceeded to publish his memoirs, with a publishing firm that included as a partner American writer Mark Twain. He completed the memoirs five days before he died, but died before the project could be completed and published.

Grant died at Mount McGregor in the Adirondack Mountains July 23, 1885. He was buried at Riverside Park, New York. The tomb that bears his name was dedicated by President William McKinley on April 27, 1897, the 75th anniversary of Grant's birth. President Grant's wife, Mrs. Julia Dent Grant, was also interred here upon her death in 1902.

The decision to bury him in New York was made by his family. His funeral, held in New York City on August 8, 1885, was one of the most spectacular processions ever staged in America. A high bluff in Riverside Park, overlooking the Hudson River, was chosen for the tomb. Grant's remains were housed temporarily in a brick structure erected just north of the site of the tomb.

Brief History of the Site and Structure

Following Grant's death, the mayor of New York appointed a committee, soon to be called the Grant Monument Association, to plan for the construction of a grand tomb. The association secretary, Richard T. Greener (the first African American graduate of Harvard University and Dean of Howard University Law School), initiated nationwide fund-raising efforts for the monument. Contributions from areas other than New York were minimal, and by 1886 interest had waned and only about $200,000 had been collected, far less than the $1 million goal. What began as a dedicated and unified objective developed into a situation fraught with problems; the association made little progress in reaching its goal. In fact, funding, design, construction, and decoration of the monument were problematic from the project's inception through its completion.

Several competitions were held for the design of the monument. In 1885 *American Architect and Building News* organized a competition. Three years later, the Grant Monument Association announced an international competition. The competition was reopened in 1890, with design requests extended to five leading architects. This time, a design by John H. Duncan of New York was chosen. Although a strong and successful fund-raising effort had also been carried out, there was still not nearly enough to execute Duncan's full scheme.

On April 27, 1891 (Grant's birthday), ground was broken for the monument. Before construction could begin, internal association obstacles and funding problems again halted the project, followed by yet another fund-raising effort. Construction finally began in 1892. In 1897 the monument was complete, although not to Duncan's original scheme. In addition to several design modifications made during construction, the architect had intended to have a figure of Victory on the pinnacle of the conical roof, equestrian statues over the portico, artworks in the interior, and an equestrian statue of Grant on the approach to the tomb, none of which were executed. The design also included a grand descent to the Hudson River with an arch over the existing railroad tracks and a wide boat landing, which was also never executed.

On April 17, 1897, Grant's remains were quietly placed in the tomb. When the monument was dedicated on April 27, millions of people attended the ceremonies. Gen. Ulysses Simpson Grant, the Union commander who brought the Civil War to an end and the 18th president of the United States, was finally laid to rest.

The tomb, a combination of classical architectural styles, cost $900,000 and is the largest private mausoleum in the United States. The tomb, its location, size, architecture, and iconography has much to say about Grant and the period in which it was designed and built. The tomb represents the aspirations of the Gilded Age in all of its indulgence, as well as the much hoped for peace and tranquility in post-Civil War America within the context of Republican legitimacy, stability, and as Grant's supporters saw it, permanence of order.

The Grant Monument Association administered the tomb until May 1, 1959, when ownership was transferred to the National Park Service and it became General Grant National Memorial. On October 15, 1966, the tomb was listed on the National Register of Historic Places with historical documentation following on October 18, 1976.

Architectural and Site Description and Development

Duncan's design was modeled after the reconstructions of the Temple of Zeus Olympious at Agrigentum, the tomb of King Mausolus at Halicarnassus, and the tomb of Napoleon in the Dome des Invalides.

The monument is constructed of reinforced concrete and brick with light-colored North

Jay (Maine) granite block facing the exterior. The roof is constructed of an armature of steel beams in a conical configuration with steel shelf angles supporting stone blocks. The interior dome is also constructed on an iron armature.

The monument features a 90-square-foot blocklike podium, surmounted by a drum that is in turn, surmounted by a stepped conical roof; the building is 150 feet tall. A Doric portico (with six columns) defines the facade (facing south). The back and side walls are marked by blind Doric colonnades (four columns each) with square windows between the columns. A belt course extends around the podium at the level of the portico entablature, and a cornice extends around the top of the podium. Lion heads are situated along the cornice and serve as scuppers. The drum is marked by an Ionic peristyle and a ring of fascia at the very top. The tomb is accessed by 18 steps (with a landing) leading up to the portico and to a set of monumental bronze doors. Two eagles are set on the parapet walls on either side of the steps. Two reclining figures (designed by J. Massey Rhind) flank a panel in the center of the facade parapet with the words "Let Us Have Peace," Grant's acceptance words for the 1868 Republican nomination.

The interior of the tomb consists of one large hall, open from the crypt to the coffered dome at the top of the drum. Coffered barrel vaults are on each side of the podium. The main floor is pierced in the center to provide a view to the circular crypt below it, within which are two red Montello (Wisconsin) porphyry sarcophagi. Two sets of stairs lead down to the crypt from the north end of the hall. A gallery encircles the hall at the level of the drum base. Two small circular rooms (reliquary rooms) are in the northeast and northwest corners of the hall. In the southwest corner is a stairwell, and in the southeast corner the former stairwell has been remodeled into a small room. Polished Italian and tooled Lee marble were used for floors and walls. The dome, vaults, and pendentives are faced with a mixture of plaster and Keene cement, painted white.

Interior embellishments have been added over time. The allegorical groups of figures in the pendentives (designed by Rhind) were created during the tomb's construction. Originally the windows were of clear glass and covered with purple silk drapes. In 1913 these were changed to leaded sash with purple glass from the Tiffany studios. Later, in 1938, the glass was replaced with the amber-colored glass to make the interior less somber.

The original appearance of the reliquary rooms is difficult to ascertain from documents. A collection of Civil War battle flags, housed in bronze cases, were displayed in the center of each room. In 1938 maps of the southeastern United States were painted onto the walls by William Dean Fausett; in 1969–70 they were painted over for a new exhibit scheme, and the bronze flag cases were removed. In 1995 the mural in the west reliquary room was restored. The mosaics in the lunettes, designed by Allen Cox and executed by the Venetian Art Mosaics Studio in 1965–66, depict scenes from Grant's military career.

In the 1920s the Grant Monument Association decided to complete the monument as Duncan originally envisioned it. In 1928 architect John Russell Pope was hired for this task. He planned to broaden the appearance of the base of the monument by adding a terrace with heavy retaining walls; the southern plaza was to be bordered by landscaping and shade trees. The plan was thwarted by the Depression.

In 1938, in alliance with the Works Progress Administration and the city Parks Department, the association implemented a modified version of the Pope plan. By 1939 the terrace, retaining wall, plaza, and landscape were completed. The eagles flanking the steps were brought to the site following the demolition of the old New York City Post Office where they had been situated. On the

interior, windows were changed, reliquary room mural paintings were done, bronze busts of Grant's commanding officers were made for the niches in the crypt, all marble was cleaned, and plaster was painted.

In 1897 the tomb was surrounded by pavement and grass. In 1972–74, Pedro Silva and Cityarts Workshop created brightly colored undulating mosaic sculptured seating, inspired by the benches in Barcelona by Spanish architect Antonio Gaudi, to fit within the terrace walls. The mosaic sculptured seating commemorates the 100th anniversary of Grant's signing of the legislation that designated Yellowstone the first national park.

Remedial repairs have been carried out during the National Park Service's tenure. The mosaics in the lunettes were installed and exhibits were changed. The bronze and glass storm doors to the tomb were constructed during the installation of the mosaics. The recent repair of the subroof and the heating / ventilation / air-conditioning system at the tomb will help the atmospheric conditions in the tomb and be a positive impact on the collections on exhibit.

Museum Collections

The collection associated with General Grant and the tomb is stored at Federal Hall. The collection includes the archives of the Grant Monument Association and the regimental and national colors of the Civil War era formerly displayed in the tomb. One flag remains on display in the east reliquary room. Five bronze busts of Grant's commanding officers and a bronze scale model of an equestrian statue are also on display in the tomb.

Riverside Park and Drive

Riverside Park and Drive, a product of the mid-19th century parks movement in the United States, is a significant and distinctive landscape design by Frederick Law Olmsted and Calvert Vaux. Started in 1874, the park's site was unique in that it transformed a steep and narrow stretch of land into a functional park area. Situated at Riverside Drive and West 122nd Street in upper Manhattan, the park extends north-south for 2.5 miles along the Hudson River. Olmsted used the topography of the site to define different sections for driving, walking, and other forms of recreation, and attempted to make the park an informal and unrestricted extension of the countryside. The park is characterized by rustic stone, natural vegetation, and winding paths.

The park also exemplifies two other eras of landscape design. The City Beautiful movement of 1909–10 added statuary, monuments, and assorted viewing pavilions. The pavilions were small neoclassical structures with a viewing platform at street level and a restroom facility on the lower level. One pavilion, overlooking the Hudson and just west of the tomb across Riverside Drive, was completed in 1910 with the intention of bringing residents out to park spaces and providing restrooms. Structurally and visually the pavilion and surrounding hillside are now in poor condition; the upper pavilion level has not been maintained, and the restrooms on the lower level, which is closed to the public, are in disrepair due to vandalism and lack of maintenance.

In the 1930s, under the direction of Robert Moses, 132 acres were added to Riverside Park, extending it to the Hudson River and creating wide expanses and promenades. Although the Moses' concept was distinct from the Olmsted and Vaux plan, both are important contributions in the tradition of landscape design. Riverside Park and Drive are historically significant as an impetus for development on the upper west side of Manhattan.

Riverside Park, listed on the National Register of Historic Places, is owned, administered, and maintained by the city's Department of Parks and Recreation.

Maintenance and physical upkeep of the area has been limited due to city budget restrictions. The park area around the tomb includes shrubbery, a large lawn area behind the tomb, and large sycamores that line the plaza in front of the tomb. Originally, the memorial was a visual focal point within Riverside Park, without any landscaping.

Ethnographic Resources

General Grant's tomb and the surrounding park areas have contemporary groups that have become traditionally associated with them. The Grant family descendants are actively involved with the site. Other groups, especially from neighboring communities, associate with the site through events and use of the surrounding parks.

In 1995 a *Rapid Ethnographic Assessment Report* (Jones 1995) was prepared for General Grant National Memorial and the surrounding area, which included portions of Riverside Park. The study was organized into four study subjects: people's perceptions and attitudes about General Grant and the tomb itself; the Jazzmobile; daily uses, perceptions, and feelings about Sakura and Riverside-Claremont park areas within Riverside Park; and the social context. (Claremont and Sakura Parks, smaller parks within Riverside Park, are gathering places for neighborhood residents.) Area residents and visitors to the tomb site and parks were surveyed and interviewed in summer 1994. According to the study, residents in the immediate area of the tomb and parks are primarily white (Euro-American) and African American and Hispanic neighborhoods are a few blocks away. This diversity explains some of the different perceptions and uses of the area.

The report concluded that site users and area residents have more interest in events and the recreational/open space values of the park than the history or remains of General Grant. Some people expressed a positive reaction about Grant and the tomb, referring to Grant's role in history and the pride that the tomb of such a significant historical figure is in New York. Some people interviewed did not have opinions about Grant but felt that the structure is architecturally significant and an important feature in the neighborhood; this opinion was widely expressed by the attendees of the concerts.

Although tourists visit the tomb on a daily basis, most are not from New York. The local residents use Claremont and Sakura Parks more frequently than they use the tomb site. It is commonly believed that the maintenance and appearance of General Grant's tomb directly influences the other two parks. If the tomb site were not maintained and if the Grants' remains were relocated, area residents felt that this would reduce resources available to the site and have a negative effect on the quality of Claremont and Sakura Parks.

The Jazzmobile and Gospelfest concerts and Harlem Week activities are the major events that attract area residents and a citywide audience to the site. The Jazzmobile is the most significant event, with an attendance of 3,500–5,000 people at each concert (see later "Annual Events" section). Although the Harlem Week activities also occur at the site, the Jazzmobile has a long-term association with the site. Although many area residents describe the jazz concerts as one of the most important events in the neighborhood, the Jazzmobile is viewed as a cultural and intergenerational institution in the African American community. Most of the patrons of the concerts are African American.

The music does not seem to be an attraction in the Hispanic neighborhood, but residents are attracted to the associated social gatherings and the vendors that sell food and other goods during the concerts. Over time, the concerts have become extremely popular and attendance has grown. The character of the crowd has changed with the appearance of younger groups of people, which often provides the perception of boisterous behavior. Some members of the

community have concerns about activities associated with the concerts, such as the vendors, size of the crowd, parking, and custodial issues. This is often perceived as discontentment with the actual performance, which is a misconception. Most of the patrons of the concerts feel positively about the tomb because of the Jazzmobile, now a cultural institution in the neighborhood.

Claremont and Sakura Parks are used for many different activities by the community, which is actively involved with the upkeep and maintenance of these parks. Most of the residents believe that the parks are generally safe during the day. Claremont Park, which is more frequently used by members of the African American and Hispanic communities, has a playground and park area. Events such as weddings and parties occur there, as well as other uses such as picnics, sporting activities, school field trips, and relaxing. Sakura Park, which is frequented by the white community during the day, is often used by joggers, bikers, and people recreating in other ways. At night the park is used socially by Hispanic youth.

NATURAL RESOURCES

Site Resources

The natural resources at General Grant's tomb are on the grounds surrounding the mausoleum and on surrounding lands owned and administered by the city's Department of Parks and Recreation. The authority for stewardship and management of these resources is solely the city's responsibility. The National Park Service has little control over use or maintenance of the site and has no authority to expand beyond the mausoleum to address the unmet visitor needs.

The known natural resources at this site are similar to those described in general for the Manhattan Sites unit. The area surrounding the mausoleum is landscaped with several large trees, a plaza, shrubbery, and a lawn area. There are no water resources or wetlands on the site, and the tomb is outside the area of predicted 100- and 500-year floods. The base elevations range from 180 to 190 feet above mean sea level, and the area has additional protection from flooding by a bulkhead that was constructed on the embankment of the nearby Hudson River.

Threatened and Endangered Species

Consultation with the U.S. Fish and Wildlife Service office in New York and the Significant Habitat unit of New York Department of Environmental Conservation revealed that the peregrine falcon *(Falco peregrinus)* is listed on state and federal lists as an endangered species and is known to breed and use habitat near Grant's tomb (see appendix D). According to the New York Natural Heritage program, the peregrine falcon has heritage global and state ranks of G3 and S2, respectively. The G3 rank, which reflects the falcon's rarity throughout the world, indicates it is either (1) very rare and local throughout its range, (2) that it is found locally in a restricted range, or (3) that it is vulnerable to extinction throughout its range because of other factors. The S2 state rarity rating means that the species (1) is limited typically to 6 to 20 occurrences, (2) has few remaining individuals, or (3) that there are factors that make it very vulnerable.

Staff members of the Natural Resources Unit of the Department of Environmental Conservation are actively involved in the perpetuation and management of peregrine falcons in the city. Their research indicates that several peregrine falcon nest and use habitat areas that are near the memorial. One pair of peregrine's have successfully bred and produced young within the area.

SOCIOECONOMIC ENVIRONMENT

General Characteristics

General Grant National Memorial is in Manhattan Community District 9 along with a number of distinguished educational, religious, and cultural institutions such as Barnard College, Columbia University, Jewish Theological Seminary, Union Theological Seminary, Riverside Church, and the Manhattan School of Music. Two public housing projects, the General Grant Houses and Morningside Gardens, are within several blocks of the site.

Statistics compiled by the city's Department of City Planning show marked demographic changes occurring in this densely populated area of northwestern Manhattan over the last 25 years. Although the overall size of the residential population increased slightly (3.8%) between 1980 and 1990, the percentage of foreign-born individuals grew by more than 25% (from 25.8% to 31.1% of the total). Continuing a trend established in the 1970s, roughly half of the foreign-born residents are also recent immigrants. In 1990 nearly half of the population (43.8%) spoke a language other than English at home.

The available New York City statistics do not identify residents by race. However, other indicators point to the area's racial and ethnic composition. In Community District 9, Spanish is the native language of 39.7% of all residents (77.9% of those who speak a language other than English at home) including more than 21,000 Dominicans (20.4% of the total population). Cubans, Ecuadorans, Colombians, Salvadorans, Hondurans, Panamanians, and Peruvians are represented in comparatively smaller numbers. As in other Manhattan districts, Mexicans, though still a small percentage of the overall population, are the most rapidly increasing Hispanic group. (Puerto Ricans are not identified unless they arrived from Puerto Rico between 1980 and 1990). Between 1980 and 1990, the percentage of people reporting European ancestry decreased from 21.8% to 16.3% of the total. Asian and Pacific Islanders, Africans, West Indians, and Arabs comprised small groups (less than 5% each).

Income disparities, educational and economic opportunities, and related lifestyles in Community District 9 may be among the most marked in New York City. In 1990, two-thirds of all residents were living near or below the poverty level. Those living below the poverty level included 43.9% of the district's children and 27.9% of its elderly. In contrast, 7% of area households earned $75,000 or more — of which 41.4% were individuals and nonfamily groups.

Total population in this district (106,943) is higher than in districts 1 and 5, but median household and per capita incomes are lower, at $20,775 and $11,691, respectively. Of the 21,869 families counted in the 1990 census, 25% were below the poverty level. Industrial and commercial lots account for only 8% of the total tax lots in the district; the remainder are generally residential. Gross median rents are lower than in lower and midtown Manhattan at $415 per month.

Local Issues

District 9 shares some concerns with many other districts, including traffic congestion and circulation, lack of adequate recreational parks, and homelessness.

Many district issues relate directly to General Grant's tomb. The district is fortunate to have more than 75.3 acres of park lands, 26 acres of which are in Riverside Park, part of which surrounds the tomb. Reconstruction of the park stopped at 110th Street (south of the tomb) due to city budget restraints. Portions of the park, including the areas near the tomb, need stone wall restorations, pathway and hillside reconstruction, and trimming, cleaning, and removing overgrown greenery. Continual grounds and maintenance crews would also be needed to maintain open

areas and park facilities once renovations are complete.

A concern unique to district 9 that potentially affects the tomb and Hamilton Grange (discussed in a separate management plan [NPS 1995c]) and their future management is local economic development opportunities. The Community Board (in the City of New York Department of City Planning *Community District Needs Report, Fiscal Year 1995* [1993]) projects their district as an area characterized by high unemployment rates and a high percentage of the community who depend on public assistance for economic survival. They feel that the district is economically isolated and has not been the beneficiary of any of the city's economic development programs.

The community is seeking to change this isolation through a number of recommendations, including working closely with state and city park officials to ensure that local merchants and interested community residents could obtain concession stand permits at Riverbank State Park. The community is looking for new development and job opportunities and is interested in future plans for General Grant and Hamilton Grange National Memorials that might benefit local residents. Another proposed project is the Harlem Pier, to be built just north of Grant's tomb.

CARRYING CAPACITY

The structure's capacity is 250 people, excluding the exterior plaza area, which is based on safety regulations and preservation of the resources.

NPS OPERATIONS

The current annual operating costs at Grant's tomb are $558,000, and there are eight full-time employees.

REGIONAL LAND USE AND VISITOR FACILITIES

Several parks and potential new developments, discussed below, exist in the vicinity of General Grant's tomb. These parks and developments could meet local community recreational needs and positively interact with other national park system sites such as Hamilton Grange. Because New York City tourism is a $12 billion industry annually, an important economic objective of these projects could be to encourage visitors already in New York to stay an additional day and visit sites in the Harlem area. Other important objectives could be to improve the quality of the area, capture additional local consumer spending, and provide examples of partnerships between the community, agencies, and private businesses.

Riverbank State Park

Dedicated on May 27, 1993, this state park is new to the Harlem community. Built on top of a controversial sewage treatment plant for Manhattan's west side, the park was in various stages of planning for 25 years. The park is an urban contemporary park that provides a wide range of recreational experiences for Manhattan residents and visitors. It was designed as a recreational park that focussed on extensive use by neighborhood residents. Community representatives (e.g., community boards and other organization members) were involved in the planning process and continue to be involved in daily decisions at the park. Many of the park staff live in the surrounding community, which provides positive local economic benefits. This park appears to provide an excellent role model and foundation for success that the National Park Service can apply to planning and restoring other national park system sites, such as General Grant's tomb and Hamilton Grange.

Harlem Pier

The proposed Harlem-on-the-Hudson project might also impact the tomb site. According to Community Board 9, this project, at the Harlem Pier on the Hudson River and 125th Street (just north of the tomb), is the last remaining major opportunity for community development. Proposed uses have varied but have included a hotel, market rate housing, and a modernized farmer's market.

Recent feasibility assessments indicate these projects have questionable economic viability. In light of these findings, the board is recommending that the city promote additional industrial uses in the area. A second recommendation is to create open space and recreation through an extension of the esplanade to connect with Riverside Park and possibly the reestablishment of the recreation pier that once served Harlem. The reestablishment of rail service for Metro North at 125th and 145th Streets on the Amtrak line could also enhance accessibility to Riverbank State Park, the piers, and other local attractions. Such development could attract additional visitors into the area and could increase public awareness of and visitation to the tomb.

COOPERATORS

There are no formal cooperators at General Grant's tomb. However, a number of groups are actively involved throughout the year at the site, some of which obtain special use permits for activities, for example the Jazzmobile. Groups such as the Civil War Roundtable occasionally participate in events related to Grant.

TRANSPORTATION

General Grant's tomb is accessible via the M4, M5, or M104 bus. The no. 1 or no. 9 subway trains also provide service, with the closest stop at 125th Street. Another stop is available at 116th Street near Columbia University. Although curbside parking is available in the vicinity of the tomb, parking opportunities on Riverside Drive directly adjacent to the tomb are scarce. It is difficult, if not impossible, to ensure the availability of parking in the area.

VISITOR USE AND INTERPRETATION

General Visitation

Visitation at the tomb has varied over the past 10 years (see table below). Use fluctuations may be due to different special events that occur at the site from year to year, as well as from varying NPS community outreach efforts and site programs such as junior park rangers. Most visitors passively look at the tomb and its exhibits. As staff is available, some interpretive talks are offered to interested visitors. Special events occurring at the tomb and in the surrounding park are many and varied.

Annual Events

General Grant's birthday is celebrated annually in April. In 1995 the event featured costumed interpretive tours of the site, the symbolic firing of a cannon, and dedication speeches. The Jazzmobile and Harlem Week activities occur on the steps of the tomb and throughout the surrounding park. The Jazzmobile occurs Wednesday evenings in July and August. Events related to Harlem Week occur in August. The organizations sponsoring the events work in conjunction with the site manager before and during the events.

Jazzmobile has been occurring for many years at the tomb and is a significant event to many New York City and New Jersey African Americans. Attendance at Jazzmobile currently reaches 3,500–5,000, and as many as 350 vendors line the street during the events. Some participants have noted that the event has become more like a street fair than just a jazz performance. Vendors at

Jazzmobile are required to be members of the United African Merchant Society. The merchant's association pays for the cleanup, provides the portable toilets, polices the affair, and pays a fee to the city for booth set-up.

Lack of Visibility

Community research completed for this plan noted an interesting phenomena — that Grant's tomb can almost be described as an invisible monument. This perception emerges because of the general lack of visibility of the monument in New York City and in the local community. For example, there are signs for other important sites in subway stations all over the city; however, at the 116th and 125th Street subway stations there are no signs for General Grant's tomb. Interviewed local residents and businesses are unaware of the name of the tomb and its significance. Many community residents associate the tomb with special events such as Jazzmobile rather than with General Grant.

This lack of visibility is interesting given the past status of the tomb. The opening of the tomb was one of the largest and most celebrated events in New York. In 1898, 457,018 visitors were recorded at Grant's tomb. In 1906, the number was 607,484; by the 1950s visitation had dropped to about 250,000. Then, as well as now, most visitors to the tomb are not New Yorkers.

TABLE 9. GENERAL GRANT NATIONAL MEMORIAL, VISITATION

Year	Visits/Year
1981	41,292
1982	43,860
1983	82,832
1984	87,154
1985	68,560
1986	61,208
1987	101,992
1988	74,685
1989	107,215
1990	120,883
1991	102,229
1992	82,006
1993	57,693
1994	61,697

NOTE: Visitation is counted by park ranger or volunteer with counting device at site entrance. For special events, the number of people that fill one area is multiplied by the number of areas that are the same size and also filled with people.

IMPACTS COMMON TO ALL ALTERNATIVES

Impacts on Cultural Resources

Impacts on Historic Structure. Modifications to provide access to the main level for visitors in wheelchairs could adversely affect historic fabric during installation.

Impacts on Museum Collections. The current interim storage of the Grant collection at Federal Hall would continue to be maintained and would be positive because of the ongoing improvements in the collection storage area at Federal Hall and the room there for conservation work. Eventual storage in appropriate conditions at Hamilton Grange, once the Grange is relocated and rehabilitated, would also have a positive impact on the collection because it would also be near the site.

Impacts on Natural Resources

Impacts on Floodplains. General Grant's tomb is outside both the 100- and 500-year floodplain as determined by the Federal Emergency Management Agency. Therefore, there would be no associated impacts on floodplain values at the site.

Impacts on Coastal Zone Management. With required concurrence with New York's coastal zone management program, there would be no impacts on coastal zone management.

Impacts on Visitor Use and Interpretation

Updated brochures, handbook, and outside kiosk would enhance visitor experience (especially with multilingual information).

Impacts on NPS Operations

Overnight security services would continue to deter vandalism and graffiti.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

Some historic fabric would be irreversibly and irretrievably lost while providing access to visitors with disabilities.

ALTERNATIVE 1

Impacts on Cultural Resources

Impacts on Historic Structures. This alternative would have no additional negative effects on the historic fabric, integrity, or national register status of the interior or exterior of this structure. The structural repair work would improve the overall condition of the structure, aiding in its continued preservation and future maintenance. Mosaic sculptured seating would not be affected. (Although these seats are not historic, they are associated with the site.)

Impacts on Ethnographic Resources. Because the activities that currently occur at the site, such as the Jazzmobile and Harlem Week, would continue, there would be no anticipated impacts on the patrons of these events. However, activities associated with these events, such as parking problems, crowds, and littering, would continue to negatively impact the neighborhood. Continuing these events would provide cultural awareness, which could benefit neighborhood relationships. The continuation of the Jazzmobile and other such events at the site would also have a positive impact on the site because patrons of the events, many of

whom live near the site, are provided continued opportunities to learn about the significance of the site. This would promote goodwill between the neighboring communities and the National Park Service.

The continued maintenance and preservation of the tomb and its resources would have a positive impact on Grant's descendants.

Impacts on Historic Landscape and Riverside Park. The landscape and visual scene of the plaza adjacent to the tomb as well as Riverside Park would remain unchanged under this alternative, thus would have no impact on the residents and neighborhoods surrounding Riverside Park and the tomb.

Impacts on Archeological Resources. Because this alternative would not involve any ground-disturbing activities that would involve archeological investigation, impacting any archeological resources would be unlikely.

Impacts on Natural Resources

There would be no short- or long-term impacts on the natural resources associated with the actions proposed in alternative 1.

Impacts on Threatened or Endangered Species. The no-action alternative would not affect species listed as endangered or threatened or habitat considered critical by the U.S. Fish and Wildlife Service or the Significant Habitat Unit of New York Department of Environmental Conservation. Because no new development is proposed by this alternative there would not be any additional impacts on the peregrine falcon, which is listed on federal and state lists as an endangered species and has been observed in the vicinity of the tomb.

Impacts on Regional Land Use and Visitor Facilities

The actions proposed under alternative 1 would not result in any changes to regional land uses or other visitor facilities.

Impacts on Socioeconomic Environment

The actions proposed in alternative 1 would not result in changes to local socioeconomic characteristics.

Impacts on Visitor Use and Interpretation

An updated interpretive program would include the revision of some of the exhibits and site booklet. Ranger talks and costumed interpretation would provide the visitor a better understanding of the history of Grant and the site, although this alternative would still offer limited opportunities to fully interpret all of the site's themes. This would be a negative impact on visitors and area residents because the tomb and its significance are not often understood. The contact desk and book sales would remain in the tomb, which would continue to have a negative impact on the solemnity of the tomb. No onsite restrooms would be provided.

Impacts on Transportation and Parking

There would not be any impacts on transportation around or to the area of the tomb under this alternative. Furthermore, the parking situation would remain the same.

Impacts on NPS Operations

Under this alternative, park operations would continue as they currently exist. The maintenance space would continue to be inadequate, and there would not be any onsite restroom facilities.

Cumulative Impacts

The rehabilitation and maintenance at the site would help the preservation of the structure and site. The security at the site would continue to deter vandalism and graffiti on the structure and surrounding site — a positive impact on the surrounding community because the site would be more welcoming to visitors and residents of the area.

Several parks and potential new developments exist in the vicinity of Grant's tomb. These parks and developments could meet local community recreational needs, as well as positively interact with other national park system sites such as Hamilton Grange. Because tourism is a lucrative industry, an important economic objective of this site could be to help encourage visitors already in New York to stay an additional day and visit sites in the Harlem area. This would have a positive impact as it would bring revenue to the area and would promote partnerships between the community, agencies, and private businesses.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

There would be no known additional irreversible and irretrievable commitments of resources associated with this alternative.

ALTERNATIVE 2

Impacts on Cultural Resources

If the reevaluated period of significance is found to be other than the late 1890s, some of the proposed actions might need to be adjusted.

Impacts on Historic Structures. Under this alternative, the mausoleum would be restored to its 1897 appearance, which would have a significant impact on the alterations that were subsequently made and may be historic themselves. Exterior architectural elements, such as statuary as well as some internal features (such as the window treatments), would be impacted when removed. If research proves the changes were significant, this could affect the integrity of the structure.

The mosaic sculptured seating would be relocated just north of the tomb area (in Claremont Park), which removes them from their context and the specific environment for which they were constructed and would be a negative impact on the resource. (Although these seats are not historic, they are associated with the site.) However, to mitigate this action, they would be relocated just north of the tomb (in Claremont Park), which would save them from demolition and keep them in the neighborhood and within their regional context.

Impacts on Ethnographic Resources. Under this alternative, contemporary activities such as the Jazzmobile and the events of Harlem Week, would no longer continue. This would have a negative impact on the surrounding community and on the patrons of these events because the events are considered to be cultural institutions and what give Grant's tomb its significance, especially to the African American residents of the area.

Impacts on Historic Landscape and Riverside Park. If undertaken, restoring the plaza area and the area just north of the tomb (after NPS acquisition) to its appearance at the time of the tomb completion in 1897 would have a significant impact on the landscape of Riverside Park. Such a restoration would require the removal of landscape materials, such as the mature sycamore trees planted in the 1930s by the Works Progress Administration, as well as the existing constructed plaza area. These actions would also negatively impact the area residents because the removal of trees, if undertaken,

would result in loss of the natural setting in an urban area.

The period of significance of the memorial is the late 19th century, which is being reevaluated. The reevaluation would provide a basis for any restorative actions. The actions involved in implementing this alternative would alter and thus have a negative impact on the historic 1930s landscape design as well as the current visual setting and feeling.

Impacts on Archeological Resources. The actions of removing the trees and plaza area would involve ground-disturbing activities. Although this area had been previously disturbed, there is a possibility that archeological resources might be discovered. An archeological survey would be conducted before any construction activities occurred to avoid any negative impacts.

Impacts on Natural Resources

There would not be any impacts on the water resources, soils, or air quality-related values associated with this alternative. However, it is anticipated that this alternative would have potentially significant impacts on the biological resources at the site and within the region, including vegetation, wildlife, and wildlife habitat. These impacts are associated with the proposal to remove the vegetation, including all trees, that surround and are adjacent to the mausoleum. Because these stands of vegetation provide habitat for an endangered species (please see "Impacts on Threatened and Endangered Species" below) and other species, it is anticipated that these impacts would be significant and would be considered an irreversible and irretrievable commitment of resources. Trees to be removed from the site include old-growth hardwoods that are more than 60 years old and are components of the ecosystem. The presence of the hardwood species represents the hardwood forests that once occupied Manhattan Island. Such tress are limited in the vicinity due to the predominance of the urban setting.

Impacts on Threatened and Endangered Species. During consultations with the city's Department of Environmental Conservation pertaining to the peregrine falcon, they advised the National Park Service that sycamore removal could impact the falcon's food sources. The hardwoods provide important habitat for the pigeon, which is the mainstay of the falcon's diet. Before implementing this alternative, a biological assessment of the site specifically evaluating the peregrine falcon, its habitat, and the relationship of these sycamores would be required to determine whether tree removal is a viable option pertaining to potential impacts on the peregrines in the area of the tomb. If the assessment shows that impacts would threaten the existence of the peregrines in the area, removal of this habitat would not be an option.

Other temporary direct impacts on peregrines could occur as a result of construction activities associated with removing the statuaries and renovating the mausoleum to its original design, especially on the structure's roof. Because buildings, such as those on site, are used by peregrines for their perch sites and are considered important for habitat needs, any disturbances to the roof or eves of the mausoleum could impact the peregrines using the site. The increased noise levels accompanying construction or the increased presence of heavy duty vehicles and numbers of personnel on site could also cause the peregrines to search elsewhere for their food supply within that 2- to 3-mile radius of their nesting site.

The overall impact from this construction or management of the site would not be considered threatening or significant to the peregrine's existence within the project vicinity if the following mitigating actions were met:

1. Regular monitoring by park resource specialists to ascertain the absence/presence of the peregrine within the project area.

2. If disturbance is noted by the park resource specialist, construction activities would be modified (i.e., use of noisy equipment would be minimized or stopped, construction employees would be dispersed, or work would be stopped if deemed necessary) during periods when the peregrines are flying in the project vicinity.

3. If disturbance is considered a high risk to the peregrines during nesting/fledgling season (May–July), a work stoppage order would be issued after consultation with the U.S. Fish and Wildlife Service and appropriate city and state regulatory agencies.

4. Any attempts at onsite pest management, including rodents or nuisance birds, would be required to comply with NPS integrated pest management policy and with state regulations and approval. Pest management would specifically exclude the use of onsite rodenticides.

5. The National Park Service would work with the U.S. Fish and Wildlife Service and the city and state endangered species coordinators to ensure that all possible measures were identified and taken throughout construction to eliminate any potential threat or disturbance to the peregrines in the project vicinity.

Impacts on Regional Land Use and Visitor Facilities

After NPS acquisition of the ellipse (including plaza and temporary tomb site), the National Park Service would assume ownership responsibilities. These actions would result in the loss of city-owned space in Riverside Park but would not impact total park lands available for recreational purposes in the area (see "Cumulative Impacts" also). However, as discussed in visitor use impacts, these areas would continue to be available to local residents and users for passive recreational uses. Acquisition would also shift the responsibility of the maintenance of the ellipse and nearby parklands to the National Park Service and relieve the city of some of their current maintenance responsibilities and costs in Riverside Park surrounding the tomb.

Impacts on Socioeconomic Environment

As described in the "Affected Environment" section, the Harlem community is seeking local economic development opportunities because of declining employment in the area of Community District 9. Redevelopment involving construction activities and potential increases in visitor use at a site such as the tomb could indirectly result in local retail sale increases while promoting additional employment opportunities and the stimulation of new businesses. The amount of construction dollars for redevelopment under this alternative would not be economically significant because the job, for the size of the Harlem area, is relatively small.

Material purchases and other retail sales might or might not occur in the area, depending on the availability of goods. Because federal contracting regulations do not allow hiring from specific geographic regions, there is no guarantee that the tomb-related work would be awarded to a contractor in the Harlem community. Thus, local construction-related employment opportunities would not be ensured. If a local contractor was awarded the work, the work would be relatively short-term, however some construction-related economic benefits might flow to the community.

The removal of the Jazzmobile and Gospelfest from the plaza surrounding the tomb could impact local businesses that provide goods or services to those individuals from throughout New York City who attend these

events. Vendors would most likely not be impacted because they could follow the events to their new location.

Impacts on Visitor Use and Interpretation

The actions of this alternative would enhance the interpretive potential at the site. Through personal interpretive services, the site's thematic history would be conveyed, which would have a positive impact on visitor understanding and appreciation of the site. Without the use of the plaza area by events such as the Jazzmobile, the neighborhood residents and visitors would lose these established uses of the site. The removal of the information and sales desk would also be a positive impact on the solemnity of the tomb.

Although city park property would be acquired by the National Park Service, passive use of these areas by visitors and neighborhood residents would continue to be encouraged by the National Park Service. The removal of trees would adversely impact the natural setting of the area and lessen the visitor experience of being in a natural park setting and would also remove the shaded areas that provide relief from the summer heat.

Interpretation would be somewhat improved over alternative 1 but still limited to the available printed material and talks as available. This alternative would allow for more coverage of the interpretive themes, but less in-depth coverage than in alternative 3. Visitor use and visitation would not likely increase by a substantial amount. A short-term increase might occur with the novelty of the new construction at the site.

Impacts on Transportation and Parking

There would not be any impacts on transportation around or to the area of the tomb under this alternative. The parking situation would remain the same.

Impacts on NPS Operations

The actions of this alternative would create more maintenance issues for park staff. The removal of the built plaza area would require constant maintenance of the grounds, which would become mostly grass. Security would still be required. Activities such as the Jazzmobile occur a few days a year, and discontinuation would result in only a slight alleviation of custodial and security issues at the site.

Cumulative Impacts

If undertaken, removing the vegetation cover surrounding the mausoleum would contribute to the declining forest community of Manhattan Island as a result of human actions. This could have potential long-term impacts on wildlife species that depend on this cover type for their habitat requirements.

Cumulatively, proposed land transfers for Castle Clinton and Grant's tomb, as well as the approved transfer for Hamilton Grange, might be negative impacts on the city because they represent a loss of city-owned open space and facilities in three community districts that list the need for recreational open space as high priorities. However, the land that the National Park Service would acquire would still be managed and used as park area, available for passive recreational activities. Conversely, these transfers could be beneficial because the National Park Service would be improving and maintaining the acquired acreage and facilities and relieving some of the city's associated maintenance costs.

The development of the tomb visitor center in combination with other actions such as the development of the Strivers Center Project in Harlem near Hamilton Grange, Harlem Pier and the restoration of Hamilton Grange, if promoted by the National Park Service and the city, could help to stimulate additional tourism and associated economic

benefits in the Harlem area. These development activities, in combination, have a greater chance of stimulating the local economy than each development opportunity separately. These activities, as well as the development of the visitor center and continued local use of Riverside Park, would have an economical and experiential benefit for local area residents. However additional costs for services such as police protection, street cleaning, and promotional efforts would also be incurred.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

Both irreversible and irretrievable commitments of the cultural and natural resources would result from restoring the mausoleum to its 1897 appearance and would significantly impact alterations to the structure that were completed in 1939. These alterations occurred more than 50 years ago and they could, therefore, be considered historic in their own context.

Removal of the mosaic sculptured seats and internal historic fabric would be an irreversible and irretrievable commitment of these resources.

The 1930s historic landscape would be permanently altered through the removal of landscape materials and the existing plaza area.

Site disturbance during the tree removal and plaza reconfiguration, if undertaken, could result in irreversible and irretrievable impacts on potential archeological resources. However, these impacts could be mitigated through the use of site monitors during disturbance activities and adequate protection if resources were discovered.

Finally, natural resource values, including vegetation, wildlife, and wildlife habitat, would be adversely affected if the trees and vegetation were removed, and the impacts would also be irreversible and irretrievable. The reconstruction disturbances associated with the roof or eve redevelopment could also impact the endangered peregrine if not properly mitigated.

ALTERNATIVE 3 — PROPOSED ACTION

Impacts on Cultural Resources

If the reevaluated period of significance is found to be other than the late 1890s, some of the proposed actions might need to be adjusted.

Impacts on Historic Structures. The interior would undergo positive impacts because the visitor contact and sales desk would be relocated to the offsite visitor center where more space would allow the tomb to function as a commemorative place. The continuance of the site rehabilitation would lead to the overall long-term preservation of the building and its structural fabric and historic elements. The rehabilitation of the 1910 pavilion would be a positive impact on the overall preservation of the structure. The restoration would be in conformance with NPS policies and the *Secretary of Interior's Standards for the Treatment of Historic Properties*. The mosaic sculptured seats would receive preservation treatment and be maintained in their existing location, if practicable. However, if preservation efforts were inhibited by trees along the terrace, the seating would be relocated to the Claremont section of Riverside Park where preservation treatment would continue. (Although these seats are not historic, they are associated with the site.)

Impacts on Museum Collections. The exhibits, relocated from the tomb and installed in the visitor center, would have proper security and climate control. The exhibits in the reliquary room would not have proper climate controlled conditions.

Impacts on Ethnographic Resources. As under alternative 1, the actions of this alternative would not negatively impact the activities that occur at the site, such as Jazzmobile and Harlem Week. Such events would continue in their current format and location. However, activities associated with these events, such as parking problems, crowds, and littering, would continue to negatively impact the neighborhood communities. Continuing these events would provide cultural awareness, which could benefit neighborhood relationships. The continuation of the Jazzmobile and other such events at the site would also have a positive impact on the site because patrons of the events, many of whom live near the site, are provided continued opportunities to learn about the significance of the site. This would promote goodwill between the neighboring communities and the National Park Service.

The construction of the visitor center would not be perceived to negatively impact any ethnographic resources that are associated with the site.

Impacts on Historic Landscape and Riverside Park. The actions of this alternative would not impact the area surrounding the tomb. However, depending upon the final design of the visitor center in the pavilion, the visual scene of that portion of Riverside Park could be affected by blocking views of the Hudson River. However, the amount of obscured view would be minimal. To avoid any adverse impacts, the design of the visitor center would be compatible with the existing pavilion and would be true to its original design intent.

Impacts on Archeological Resources. The new visitor center would involve ground-disturbing activities that could require archeological investigation. However, because the existing viewing pavilion and surrounding areas have undergone ground-disturbance, it is highly unlikely that any archeological resources would be discovered or impacted. However, an archeological survey would be completed before construction activities, and the site would be monitored during construction to avoid any negative impacts. This would also be true for activities related to the security fence and lighting.

Impacts on Natural Resources

There would be no significant impacts on the natural resources, including vegetation, air quality, water resources, and soils associated with this alternative. Wildlife species, including the endangered peregrine, would be impacted on a short-term basis (as described in alternative 2 pertaining to restoration work on the exterior and roof of the mausoleum. These impacts would be mitigated as described in alternative 2.

Construction activities would be expected to cause short-term air quality impacts as a result of fugitive dust and diesel emissions from construction equipment. Any associated temporary emissions from the construction equipment would be less than the conformity de minimis levels established for carbon monoxide and ozone within the region in accordance with the Clean Air Act. There would be no long-term impacts on the air quality of the park or region as a result of activities proposed by this alternative. The short-term air quality impacts would be mitigated by monitoring dust during all grading and construction phases and using appropriate watering techniques. Construction equipment would be properly maintained and serviced to minimize exhaust emissions.

Using the pavilion for a visitor center would disturb previously impacted soils during construction. Surface runoff from storms would not be affected because the area is currently developed with impermeable surfaces and flow that enters the city's drainage system.

Impacts on Threatened and Endangered Species. Impacts on the peregrine falcon

would be the same as those described for alternative 2 pertaining to exterior improvements, including the roof, of the mausoleum. (However, the significant impacts discussed for tree and landscape removal at the site would not apply for this alternative.) The mitigative measures for this proposed action would be the same as discussed for alternative 2.

Additional mitigation for actions under alternative 3 would also include the following actions for the pavilion site:

1. Any development in this area would incorporate and encourage existing vegetation patterns. Disturbance to existing vegetation would be minimized in design and construction activities.

2. Disturbed areas would be rehabilitated with topsoil and existing plant species to maintain or improve site aesthetics and prevent soil erosion.

3. A vegetation survey would be required on the hillsides adjacent to the pavilion to identify any federal or state-listed threatened or endangered plant species. Because of the lack of open, vegetated spaces throughout the city, the state Department of Environmental Conservation requested that the National Park Service survey any natural areas potentially impacted by NPS activities.

The staging area for construction activities would most likely be along Riverside Drive adjacent to the pavilion. No staging would occur on grassed areas or natural areas within Riverside Park. If dirt is stockpiled, precautions would be required to prevent stormwater runoff from the construction staging site.

Impacts on Regional Land Use and Visitor Facilities

Acquisition of the pavilion and ellipse, including the plaza and temporary tomb site, in terms of facility enhancement and visitor enjoyment, would be beneficial for the National Park Service and the city. Such a transfer would result in some reduction of city-owned space in Riverside Park (see cumulative impacts below also), facilitate NPS maintenance of the ellipse, plaza, and pavilion area and relieve the city of some of their costs and maintenance responsibilities in Riverside Park surrounding the tomb.

The pavilion, which has deteriorated and needs to be rehabilitated, would improve the aesthetics of Riverside Park and provide additional educational and recreational opportunities for local residents when renovated. In addition, the National Park Service would fund the pavilion redevelopment and city funds would no longer be required for maintenance or upkeep, unless the city became a partner or cooperator at the site.

Impacts on Socioeconomic Environment

As discussed in alternative 2, the Harlem community is seeking local economic development opportunities because of declining employment in Community District 9. The amount of construction dollars for development of the visitor center under this alternative would not be economically significant because the job, for the size of the Harlem area, would be relatively small.

Material purchases and other retail sales might or might not occur in the area, depending on the availability of goods. Because federal contracting regulations do not allow hiring from specific geographic regions, there is no guarantee that the visitor center and other tomb-related work would be awarded to a contractor in the Harlem community. Thus, local construction-related employment opportunities would not be ensured. If a local contractor was awarded the work, the work would be relatively short term; however, some construction-related economic benefits might flow to the community.

Improvements at the tomb such as the proposed visitor center could result in higher visitation levels and the possibility of greater use by bus tours. Increased visitation from such tours, if promoted and managed correctly, could provide opportunities for economic benefits to the community (see cumulative effects below).

Individuals using the site for temporary shelter might be displaced due to enhanced security. They would likely continue to occupy nearby areas, such as surrounding Riverside Park.

Impacts on Visitor Use and Interpretation

This alternative would result in a significantly improved visitor experience with the renovation of the pavilion visitor center and restrooms at the site. Both the quality and quantity of interpretive information would be expanded, and visitation would likely increase. This alternative would allow for in-depth coverage of all themes through exhibits, audiovisual media, and expanded personal services, which would be a positive impact for the visitor by providing a comprehensive history of Grant and the tomb.

Impacts on Transportation and Parking

Increased visitor use could negatively affect local traffic patterns, both temporarily and permanently. With the visitor center on the side of the road opposite the tomb, visitors would be repeatedly crossing Riverside Drive using the demand-operated traffic light and stopping local traffic. Lack of parking for private vehicles and buses would also become an issue. Construction staging for the visitor center would most likely occur on Riverside Drive, temporarily impeding traffic.

Impacts on NPS Operations

Actions under this alternative would have a positive effect on the operations of the site. Restrooms would be provided onsite, as well as minimally expanded maintenance area, which would positively impact the upkeep of the site. More staff would be needed to implement this alternative; more staff would be available for interpretation. The overnight security services and fence would continue to reduce vandalism and graffiti at the site and visitor center.

Cumulative Impacts

The development of the tomb visitor center in combination with other actions such as the development of the Strivers Center Project in Harlem near Hamilton Grange, Harlem Pier and the restoration of Hamilton Grange, if promoted by the National Park Service and the city, could help to stimulate additional tourism and associated economic benefits in the Harlem area. These development activities, in combination, have a greater chance of stimulating the local economy than each development opportunity separately. These activities, as well as the development of the visitor center and continued local use of Riverside Park, would have an economical and experiential benefit for local area residents. However additional costs for services such as police protection, street cleaning, and promotional efforts would also be incurred.

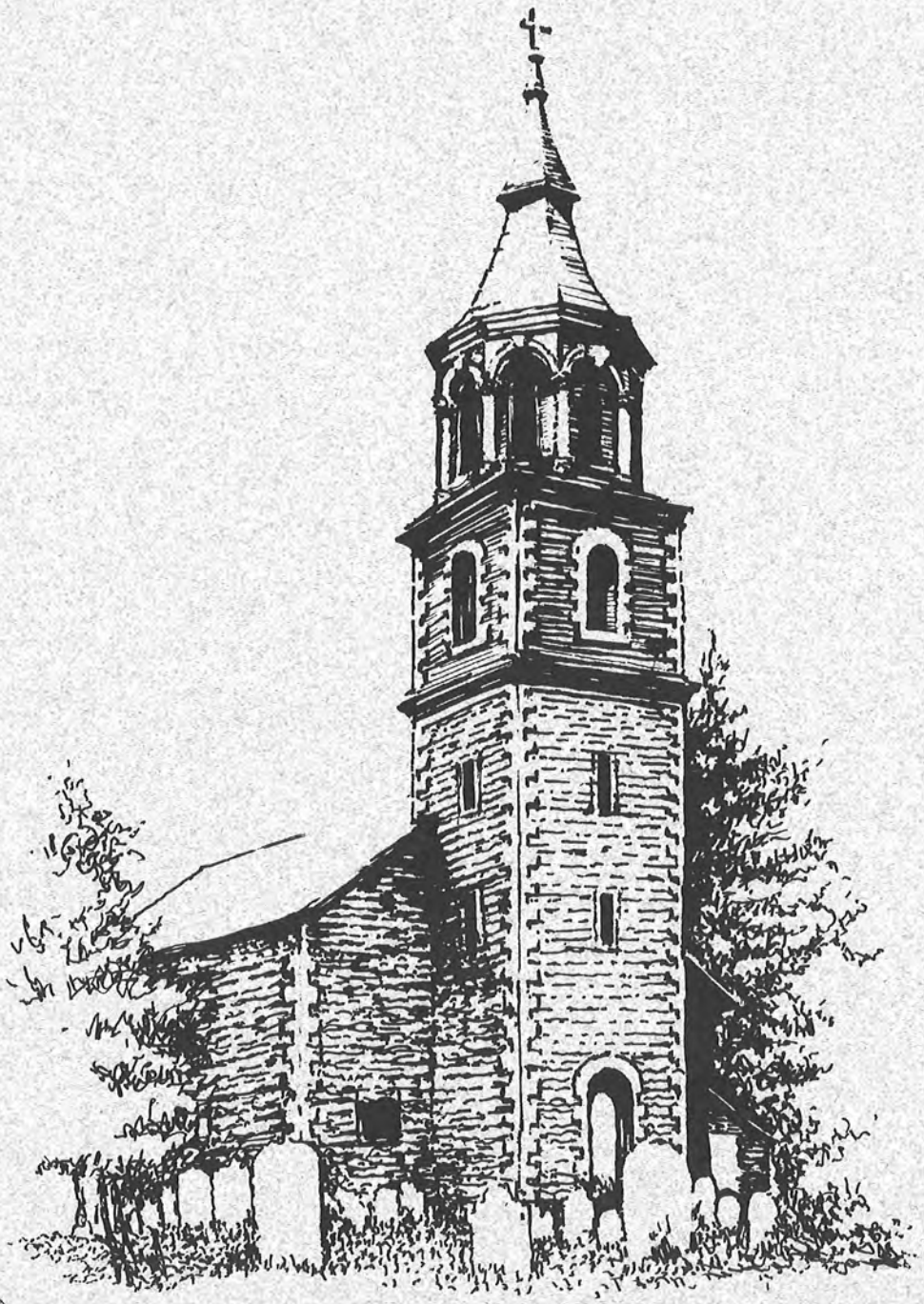
Cumulatively, the proposed land transfer of interest in land at Grant's tomb and Hamilton Grange National Memorial might be perceived as having a negative impact on the city because the transfers would represent a loss of city-owned and controlled open space and facilities in three community districts that list the need for recreational open space as a high priority. However, the land that the National Park Service would acquire would still be managed and used as park area, available for passive recreational activities. Conversely, these transfers could

be beneficial because the National Park Service would be improving and maintaining the acquired acreage and facilities, and relieving some of the city's associated maintenance costs.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

Site rehabilitation would contribute to the long-term preservation of the mausoleum and its associated structural fabric and historic elements.

An irreversible and irretrievable change to the scenic view could result from the visitor center renovation proposed at the pavilion. Mitigation is proposed through developing a design approach that maintains the original design integrity of that facility. Restoration work on the exterior and roof of the mausoleum could impact peregrines on a short-term basis, as described in alternative 2; these impacts would be mitigated as described in alternative 2.



NATIONAL PARK SERVICE
DEPARTMENT OF THE INTERIOR

Saint Paul's Church

National Historic Site

Manhattan Site • New York

SITE DESCRIPTION AND BACKGROUND

Saint Paul's Church National Historic Site is at 897 South Columbus Avenue in Mt. Vernon, New York, in southern Westchester County (see Saint Paul's Church Neighborhood map). The polygon-shaped site encompasses about 6 acres and contains a church building, carriage house, burying ground, and a small remnant of the old village green. The site is in the block defined by South Columbus Avenue on the north, Leona Lane on the east, South Third Avenue on the west, and Edison Avenue and Dock Street on the south. The property itself fronts South Columbus Avenue. The surrounding area is characterized by commercial structures and light industry.

The parish of Saint Paul's was founded in 1665. One of the longest-standing parishes in the state, the congregation used the site until just after the church building came under the jurisdiction of the National Park Service in 1980. The current church (the third on the site) is constructed of fieldstone and brick. It was built just before the Revolutionary War with major alterations carried out in the 1850s, 1880s, and 1940s. The adjacent carriage house (sometimes called the parish house) is also constructed of fieldstone and brick. A small strip of lawn in front of the church was part of the former village green. The burying ground contains more than 9,000 interments. The church is a museum now, interpreted as a religious structure and a site representative of the early preservation movement in America. The carriage house is used as a visitor center, administrative offices, and maintenance shed.

Saint Paul's Church National Historic Site is a site with historical, architectural, and potential ethnographic resources. The burying ground contains gravestones that are unique in regard to stone type, style, and iconography; it is also actively used for traditional purposes, such as burials and religious rituals.

SIGNIFICANCE

The significance described in the establishing legislation for Saint Paul's Church is that the village green in front of the church is the location where a corrupt election was held; later related actions led to the trial of John Peter Zenger and the freedom of the press. This trial also played a role in the establishment of the Bill of Rights. The significance of this site needs to be evaluated because historians no longer concur with the significance stated in the establishing legislation.

PURPOSE AND NEED

The purpose of this plan is to determine appropriate future management of Saint Paul's Church and to preserve and maintain the site and its resources. Furthermore, enhancement of the visitor experience and resolution of structural and mechanical issues at the site must be addressed.

ISSUES TO BE ADDRESSED IN THE PLAN

The assumed significance of the site is based upon a corrupt election that occurred on the village green and its effect on the development of the freedom of the press and the Bill of Rights. Researchers have found that the site's relationship to this event is a vague link in the development of the freedom of the press and needs to be reexamined.

Virtually all development, programs, and activities at the site are funded by federal appropriations, with the National Park Service providing only limited technical assistance to and oversight of the site managers. The role of the cooperators in the

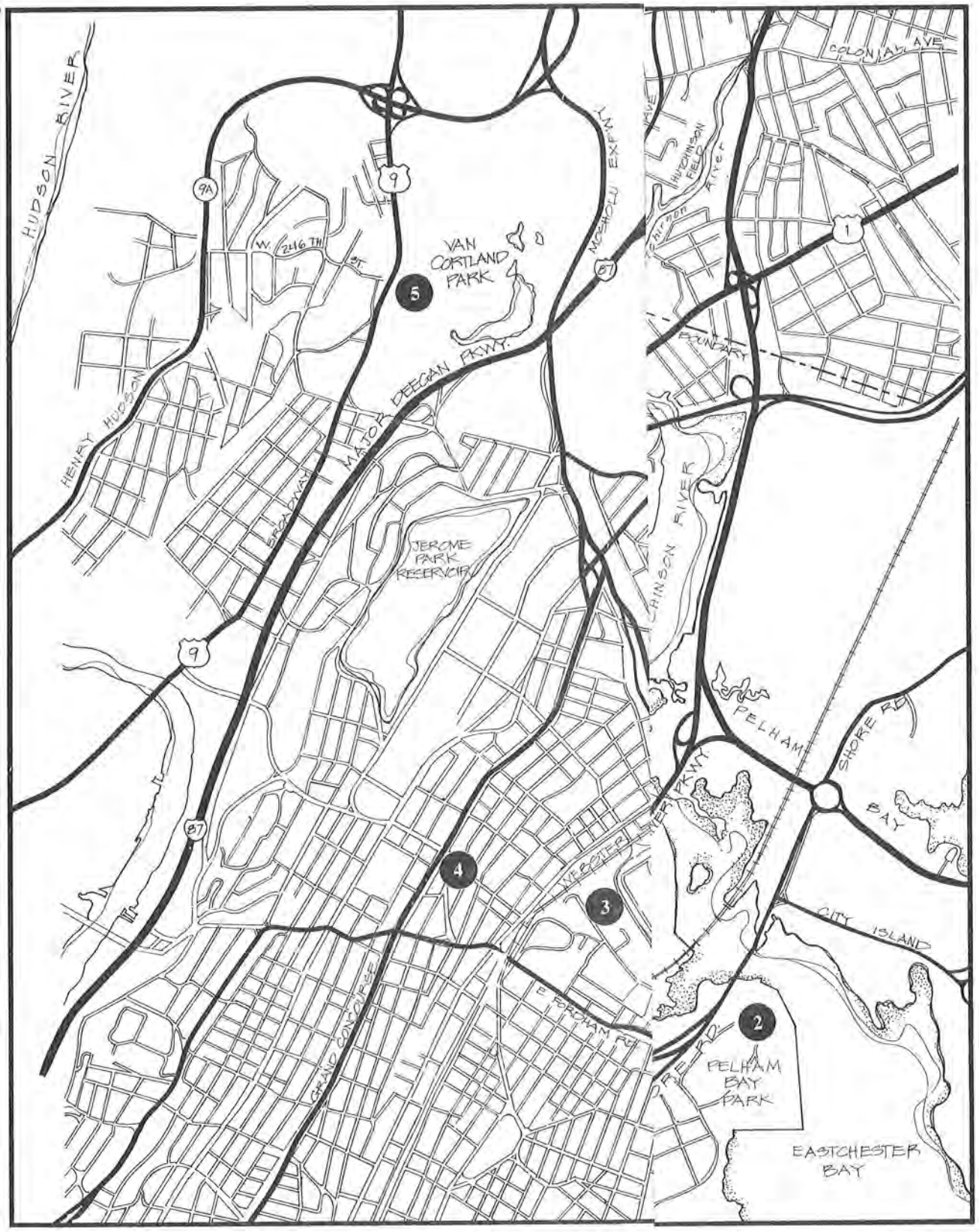
management of the site and the appropriate level of federal involvement needs to be reevaluated.

Some of the church's structural components (roof, masonry, basement structure, and bell tower) need repair. Mechanical systems, including climate control, lighting, and security in both the church and the carriage house are inadequate. The church is not fully accessible to mobility impaired visitors. The land base in the site's boundaries is insufficient for management, operation, and visitation needs (parking, curatorial storage, meeting, and research space).

The landscape at Saint Paul's Church is an important element of the site's history, yet little is known about its evolution. Historical and natural resources in the cemetery are deteriorating from pollution, acid rain, overgrown vegetation, and vandalism. Records are not always clear as to the number of deeds for burial that may still need to be honored. Historical records on some people buried in the cemetery are incomplete. Adequate cultural, natural, and ethnographic baseline data are needed for the entire site.

The site is difficult to reach by public transportation, and signs along the highway routes for visitors using a car are infrequent and unclear. Parking space is extremely limited and is a detriment to attracting visitors and school groups.

The security for the site is insufficient. Concerns such as graffiti and vandalism require safeguarding the church and carriage house as well as the cemetery.



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NEIGHBORHOOD
Saint Paul's Church
National Historic Site
United States Department of the Interior / National Park Service
NPSC / Jan. 1996 / 470 / 20,021

ALTERNATIVES FOR DEVELOPMENT AND PRESERVATION OF SAINT PAUL'S CHURCH NATIONAL HISTORIC SITE

INTRODUCTION

Interpretive themes, objectives, and two alternatives have been developed for managing Saint Paul's Church National Historic Site. Alternative 1, a no-action/ continuation of existing management alternative, describes continuing existing management at the site. Alternative 2 presents a different management option and site uses. Saint Paul's Church contains unique resources that would be protected and interpreted under any of the alternatives.

Interpretive Themes

The interpretation at the site would focus on the events that were integral to the site's development and how those events related to the development of the nation. The following primary themes would be used to interpret Saint Paul's Church:

- Saint Paul's Church and its village green was integral to the fight for freedom during the Revolutionary War. The church was seized by Hessian troops and converted into a barracks and hospital during the Battle of Pells Point.
- Saint Paul's Church maintained one of New York's oldest parishes, which was started in 1665 and continued into the 1980s; active use of the cemetery continues today.
- The existing of Saint Paul's Church building, the third church on the site, has an interesting history and architecture, which represents the philosophies and techniques of preservation and restoration.
- The burying ground and gravestones at Saint Paul's Church provide a fascinating glimpse into the congregation of the church and the social development of the community.

The difference in the interpretation of these themes in the two alternatives would be the depth of interpretation. Alternative 1 would continue existing interpretation of the themes, while alternative 2 would provide more space to interpret the themes, which would allow for a more in-depth treatment of each theme.

Visitor Experience

The National Park Service has the following goals for visitors.

- Visitors could learn the historical continuum of Saint Paul's Church National Historic Site through interpretation of the history of a village where the church was the focal point of the community and where important events occurred that affected state and national history.
- Visitors could help conserve and preserve the site's structure and collections because they would be aware of their importance and fragility.
- Visitors could learn about the role of Saint Paul's Church in historic preservation and as a national monument, as well as the importance of the survival, preservation, and protection of other such sites and the role of the National Park Service in such efforts.
- Visitors could benefit from interpretive and cultural programs, achieved through cooperation with various civic, historical, and cultural groups, that promote appreciation for and use of Saint Paul's Church.

- Visitors would benefit from extended NPS outreach programs in the surrounding communities, including Mount Vernon and lower Westchester County, the Bronx, New York, and Fairfield County, Connecticut.

ACTIONS COMMON TO ALL ALTERNATIVES

Under all alternatives, the historical significance of the site and the establishing legislation would be reevaluated.

An informal receiving area with picnic tables would be established in the grass area (the village green) in front of the church to provide a gathering and resting area for school groups and other visitors. The site's driveway would be widened to enhance traffic flow. Signs along the major highway routes to the site would be improved and added, and historical markers regarding the site would also be added. Overflow visitor and bus parking space would be provided by negotiating leases or cooperative agreements with owners of adjacent businesses. Employees would park along the road adjacent to the crypts.

Updated brochures and waysides and new bulletin cases would be provided. The waysides, placed at key interpretive areas around the site, would offer an abridged yet comprehensive walking tour of the site. The waysides at the cemetery would interpret the physical elements of the gravestones and possibly the histories of some of the people interred in the cemetery. The new bulletin cases would include the history of the site, the schedule for tours and special events, a map, and location of other national park system sites. Brochures, bulletin cases, and waysides would have multilingual information and would be accessible to visitors with visual limitations or in wheelchairs.

A conservation program would be developed for the museum collection; a storage plan would be devised, a climate-control system would be installed in the storage area, and an integrated pest management program would be implemented. Most of the onsite collection would then be stored within NPS guidelines (excluding the outside tombstones, which are permanent and exempt from the floodplain regulations).

Outreach programs for area schools would continue; efforts would be made to expand the program.

To acquire baseline data and more knowledge about the contemporary groups that are traditionally associated with Saint Paul's Church, an ethnographic overview and assessment would be done, including a research and consultation plan to identify and contact the relevant groups associated with the site. Until this study is completed, the park staff would continue to recognize and maintain relationships that are based on respect for differing lifestyles, ethnic preferences, cultural diversity, and social groupings that are associated with the site and the surrounding area.

As well as the ethnographic overview and assessment, more archeological and historical research would be done to gather data on the cultural resources of the site and site use.

The grounds would be maintained based on a future cultural landscape plan.

Although the site has a security system, steps would be taken to improve site security.

ALTERNATIVE 1: NO ACTION / MINIMUM REQUIREMENTS

Alternative 1 would continue the existing management system and meet minimum requirements for this site. The Society of the National Shrine of the Bill of Rights at Saint Paul's Church, Eastchester, Inc., would continue to employ a staff to operate the site and run the interpretive and educational programs, and the National Park Service

would continue to fund the society and oversee operations.

The church and cemetery would be preserved in their existing appearance. Ongoing repair and maintenance activities would be undertaken as needed and as funding permits (see Saint Paul's Church, Alternative 2 map). The carriage house would be preserved in its existing appearance, and any infrastructure deterioration (structural components, plumbing, heating, electrical) would be repaired.

A more comprehensive interpretive program would be initiated at the site. The carriage house would continue to be exhibit-intensive, and the exhibits would continue to be updated.

Most of the onsite collection would continue to be stored on the second floor of the church, above the flood level. Some gravestones and statuary would stay in the church basement. The part of the collection at Federal Hall would be stored in improved conditions on the third floor where there is space for conservation work. When adequate space was found that would support the weight of the gravestones being stored in the church basement, these artifacts would be moved out of the floodplain.

The site would be managed as a historic zone. The cemetery would be a preservation subzone, the church would be a preservation subzone, and the carriage house would be a preservation/adaptive use subzone. Four full-time employees, provided by the society, would continue to be required. This alternative would be the less costly of the two alternatives, with about $265,000 needed for annual operating costs and $561,000 for implementation and interpretation.

ALTERNATIVE 2: PROPOSED ACTION — NATIONAL PARK SERVICE MANAGEMENT OF THE SITE

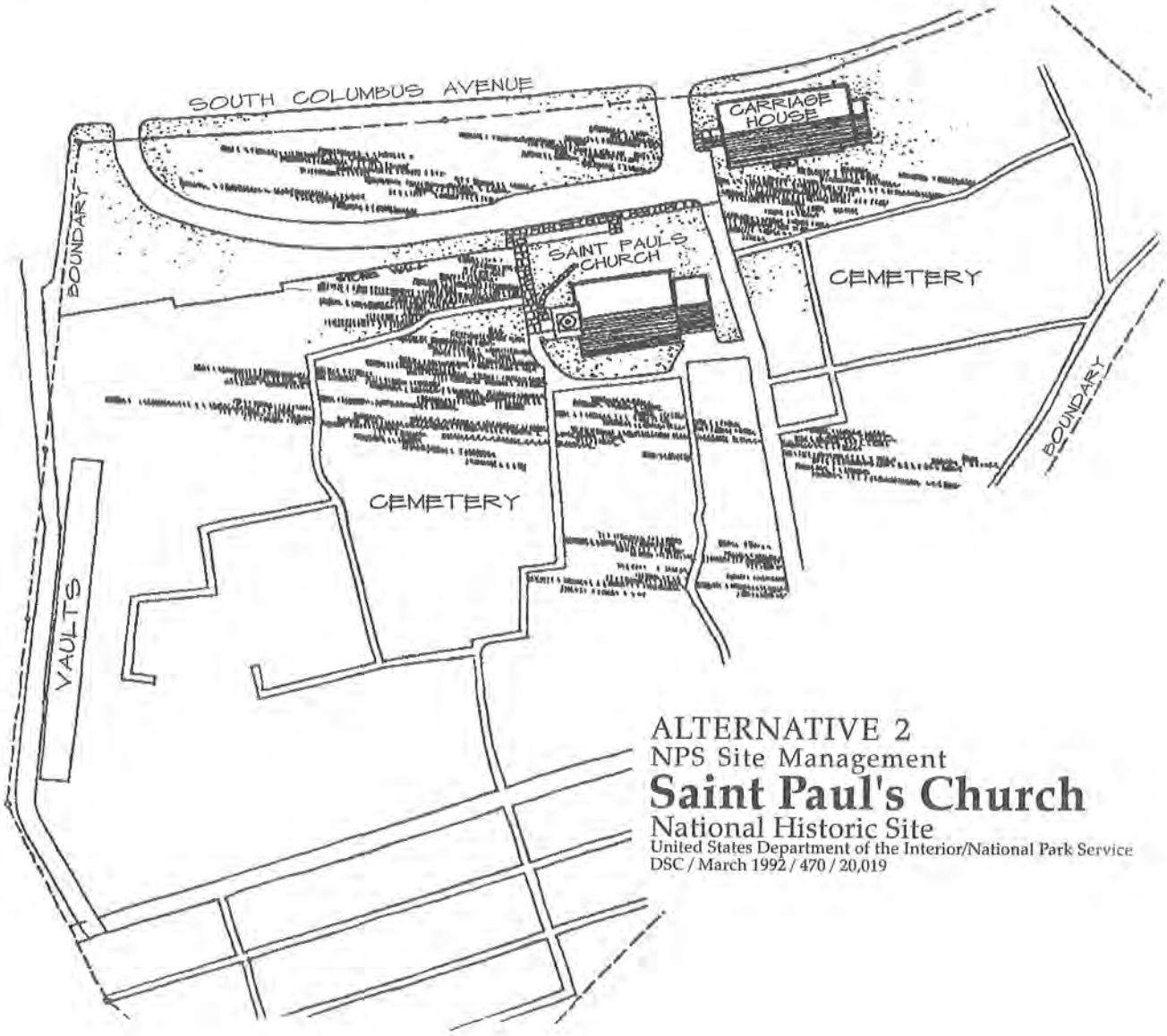
Alternative 2 would involve cooperative management of the site between the National Park Service and The Society of the National Shrine of the Bill of Rights at Saint Paul's Church, Eastchester, Inc. The Park Service would be responsible for site management and oversight responsibilities, as well as administrative staffing and large-scale maintenance. The society would provide the support staff and volunteers, as well as the responsibility of some daily operations.

The interpretive focus at Saint Paul's would be the continuum of history while emphasizing the site's role in the American colonial and revolutionary periods.

New exhibits and tours would reflect the full range of the interpretive themes and provide an educational background for visitors. Special programs, such as performing arts and community events, could be held at the site. School group and other tours would be continued, with National Park Service and society staffs and possibly volunteers relating the site's history.

An in-depth onsite historical and ethnographic research program would be established. This program would recognize and preserve the historical significance of the church, the cemetery, and the related church records and recognize their importance to traditionally associated groups, including African Americans and Hispanics. The program and materials would be used to help visitors learn about and understand how local events and the small acts of individuals have had a major impact on the history of our nation. Because of the existence of a historical continuum from the mid-17th century to the present, the story of this Westchester County community could be related to the course of America's history.

The church and cemetery would undergo extensive preservation treatment. The


SOUTH COLUMBUS AVENUE
CARRIAGE HOUSE
BOUNDARY
SAINT PAUL'S CHURCH
CEMETERY
BOUNDARY
CEMETERY
VAULTS
ALTERNATIVE 2
NPS Site Management
Saint Paul's Church
National Historic Site
United States Department of the Interior/National Park Service
DSC / March 1992 / 470 / 20,019

carriage house would house interpretive exhibits and be used for research, administrative, and maintenance activities. The entire site would be enclosed with a visually compatible perimeter fence to provide site security; access for traditional uses of the cemetery and other areas of the site would be provided.

The entire curatorial collection of the site, including the part that is currently at Federal Hall, would be moved to rented or acquired space close to Saint Paul's Church. If the National Park Service acquired property, this would require the purchase of private land. The new facility would have correct climate control, security, and pest controls, as well as enough workspace for preservation and maintenance of the collection, including the headstones.

Under this alternative the entire site would be managed as an historic preservation zone, although the carriage house would be a preservation/adaptive use subzone. Seven full-time employees would be needed to implement this alternative. This alternative would be the more costly of the two alternatives (see appendix C). Annual operational costs would be about $400,000, and about $3 million would be needed for implementation and interpretation.

ALTERNATIVES CONSIDERED BUT REJECTED

The Site as a Bill of Rights Museum

An alternative considered but rejected was the development of a National Park Service Bill of Rights Memorial to commemorate the ideals and concepts of all of the rights and freedoms embodied in the Bill of Rights. The national park system does not have a unit that specifically commemorates the Bill of Rights. However, such a memorial would have only a tentative connection to the historic resources of this site and could be developed at other and more appropriate sites. Legislation would have been required to change the purpose and name of the site and acquire land.

A museum for the Bill of Rights would have been constructed on an adjacent property that would have been acquired. Adequate land would have been required for parking to accommodate increased visitation. The church and cemetery would have been preserved, and tours would have been available, but neither would have been the primary focus of the site. The society would have continued as a cooperator but would not have been directly responsible for managing the site. Interpretation would have been focused on the history of the Bill of Rights.

This alternative was rejected for several reasons: (1) at the public meetings, the response to this alternative was negative, (2) the link of the Bill of Rights is very tentative, (3) adjacent buildings at the site are too large for conversion to a museum, and an existing structure would most likely have to be torn down to construct a new facility.

Re-creating the Historic Eastchester Village Green

Another alternative considered but rejected was re-creation of the historic Eastchester village green. This alternative would have required the removal of historic and nonhistoric resources from later periods and would have created and reconstructed a nonhistoric environment based largely on conjecture. Such actions are contradictory to NPS and Department of the Interior policy and would be considered by the state to have an adverse effect on the historic site. Also, public support for this preliminary alternative was extremely limited.

Addition to Carriage House

An alternative that would add a second floor to the carriage house was rejected because the amount of room that would be gained would not have justified the cost and would have compromised the integrity of the structure. Furthermore, the space gained would not have been sufficient for museum storage and curatorial work space.

TABLE 10. SUMMARY OF ALTERNATIVES FOR SAINT PAUL'S CHURCH

	ACTIONS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2 — PROPOSED ACTION
The Village Green	Install picnic tables in front of church to provide gathering place and resting area.		
Driveway	Widen to enhance traffic flow.		
Signs	Improve and add directional signs on major highways		
Parking	Overflow visitor and bus parking provided by negotiating leases or cooperative agreements with adjacent business owners. Employee parking on road adjacent to crypts.		
Interpretation	Updated brochures and waysides and new bulletin cases would be provided. Waysides would offer comprehensive walking tour of site; waysides at cemetery would interpret the gravestones and the possibly the life histories of some of the people interred in the cemetery. New bulletin cases would include site history, tour and event schedules, a map, and locations of other national park system sites. All would have multilingual information and be accessible to visitors with visual limitations or in wheelchairs.	A more comprehensive interpretive program would be initiated. The carriage house exhibits would continue to be updated.	Focus would be the continuum of history while emphasizing site's role in the American colonial and revolutionary periods. New exhibits and tours would be developed to reflect the full range of the interpretive themes and provide an educational background for visitors. Special programs (e.g., performing arts and community events) could be held at the site. School group and other tours would continue.
Collection	Collections at Federal Hall would be relocated to improved storage area with workspace for conservation. Site conservation program and storage plan would be developed; climate control system would be installed in storage area, and pest management program would be implemented.	Most of onsite collection would be appropriately stored and protected. Gravestones would remain in church basement until appropriate space was found. Collections at Federal Hall would be relocated to improved storage area with workspace for conservation.	Entire collection would be assembled and stored in climate-controlled, nearby rented or acquired space. New facility would have climate control, security, and workspace for conservation, preservation, and maintenance of the collection, including the headstones.
Security	System would be improved.		Site would be fenced for security.
Research	Site's significance would be reevaluated. More archeological and historical research would be done, and an ethnographic overview and assessment would be done.		Would establish onsite, in-depth, ethnographic and historical research program.
Structures and Cemetery	The grounds would be maintained based on a future cultural landscape plan.	Church and cemetery would be preserved in existing appearance. Ongoing repair and maintenance would be undertaken as needed and funding permits. Carriage house would be preserved in its existing appearance, and infrastructure would be repaired.	The church and cemetery would undergo extensive preservation treatment. The carriage house would provide space for interpretive, research, administrative, and maintenance activities.

	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action
Site/NPS Operations		Society of the National Shrine of the Bill of Rights at Saint Paul's Church, Eastchester, Inc. would continue to employ a staff to operate the site and run interpretive and educational programs; National Park Service would continue to fund society and oversee operations.	Cooperative management between the National Park Service and the society. The society would provide support staff and volunteers and the responsibility of some daily operations; the Park Service would be responsible for site management and oversight responsibilities, as well as administrative staffing and large-scale maintenance. Administrative, maintenance, and research functions would be in carriage house.
Outreach	Outreach to area schools would continue; efforts would be made to expand program.		
Staffing		4 full-time employees	7 full-time employees
Annual Operating Costs		$265,000	$400,000
Implementation Costs (including interpretation		$561,000	$3,005,000

TABLE 11. SUMMARY OF IMPACTS FOR SAINT PAUL'S CHURCH

TOPIC	ACTIONS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2 — PROPOSED ACTION
Impacts on Cultural Resources			
Impacts on Historic Structures		No adverse impacts. Church and cemetery would be preserved.	No impacts. Church and cemetery would be preserved.
Impacts on Museum Collections	Adding proper climate controls and developing storage and pest management plans and conservation program would help preserve the collection. Without funding for a consistent preservation maintenance program, the resources could deteriorate.	Continued storage of part of onsite collection in basement would continue to put that part of the collection at risk. The part of the collection at Federal Hall that would be stored in improved conditions on the third floor where there is space for conservation work would be preserved and protected. When adequate space was found that would support the weight of the gravestones being stored in the church basement, these artifacts would be moved out of the floodplain. Inadequate facilities would not allow onsite storage of the complete collection or space for conservation work.	Positive impact from providing adequate storage for entire collection out of the floodprone area and space for collection conservation and repair.
Impacts on Ethnographic Resources	Ethnographic overview and assessment would provide baseline data from which to make good management decisions about site use and contemporary groups that are traditionally associated with the site and the impacts any actions would have on these groups or resources.	No known impacts; however, ethnographic study would provide more data on associated ethnographic resources.	Same as alternative 1 plus fence installation could have a negative impact on related ethnographic groups.
Impacts on Historic Landscape	If designed and installed properly, accessible path in cemetery would not impact cemetery landscape. With compatible design, informal picnic and receiving area on village green area in front of the church would not intrude on landscape.	No new impacts.	Perimeter fence could affect site's appearance, although it would be compatible with landscape.
Impacts on Archeological Resources	With monitoring, no anticipated adverse effects.	No additional impacts.	New fence might disturb archeological resources; these potential impacts would be mitigated by monitoring.

Topic	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action
Impacts on Natural Resources	Overall minor impacts. Widening the driveway access would include removing nonnative grasses used for landscaping purposes and conversion into a paved surface. During construction, this would cause short-term displacement of small mammals, some soil compaction, and short-term impacts on air quality, which would be mitigated by using appropriate construction techniques. Impact would also be mitigated by the enhancement of traffic flow into the receiving area and picnic site. Providing appropriate drainage would ensure that storm runoff would not impact the Long Island Sound area. Protection of gravestones might require the removal of some vegetation. Trimming and/or stabilizing some large trees would benefit trees and other cultural and natural resources. Species could be impacted by proposals made in the future cultural landscape report. It is beyond the scope of this document to evaluate the impacts that could be associated with that report.	No additional impacts.	No additional impacts.
Impacts on Floodplains		Most of onsite collection would remain above base flood elevations and flood hazard factors; annual updates on state evacuation plans would be completed.	Entire collection would be in climate-controlled, secure facility outside floodplain.
Impacts on Threatened or Endangered Species	No impacts.		
Impacts on Coastal Zone Management	With concurrence, no impacts.		
Impacts on Regional Land Uses and Visitor Facilities		No impacts.	Adjacent businesses might benefit from rental or purchase of property; would not displace current businesses or other uses.
Impacts on Socioeconomic Environment		No impacts.	Continued and new special programs would be of social, educational, and cultural value to local community and could create additional awareness of site and its purpose. Security fence could create a feeling of inaccessibility to the site.

Topic	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action
Impacts on Visitor Use and Interpretation	Paths would be accessible to all visitors, as would interpretive media.	Visitor experience of site would improve. Directional signs would make site easier to find. Picnic area would provide gathering spot. Wayside panels would improve the self-guiding tours and understanding of site resources. Upgraded interpretive exhibits and expanded outreach programs would provide a more comprehensive understanding of site history.	Same as alternative 1. Also, security fence might create a sense of inaccessibility.
Impacts on Transportation/Parking	Cooperative agreement between Park Service and an adjacent businesses for overflow visitor and bus parking would be beneficial; there would be less congestion along the site driveway and enhanced safety for visitors.		
Impacts on Cooperators		No impacts.	Society responsibilities would be reduced and NPS responsibilities would increase. The number and types of jobs available could change; and, instead of being employed by the society, individuals would be employed by the National Park Service and the society. The society's role in the operation and management decisions would lessen under this alternative.
Impacts on Site/NPS Operations		No impacts.	With site operations and management becoming an NPS responsibility, with assistance from society, amount of responsibility, staff needed, and functions of both entities would change. Addition of security fence would be a positive impact on management and security of the site.
Cumulative Impacts		Expanded interpretive programs would provide a more comprehensive site history for area schoolchildren.	Same as alternative 1 plus more information could be provided because of the research program.
Unavoidable Adverse Impacts / Relationship between Short-term Uses and Long-term Productivity / and Irreversible and Irretrievable Commitment of Resources	No significant impacts. Removing some trees and shrubs that are damaging headstones and crypts would irreversibly and irretrievably impact the cultural landscape; however, the headstones and crypts being damaged would be protected.	No additional impacts.	No additional impacts.

CULTURAL RESOURCES

Brief History of the Site and Structure

In 1665, twenty-five families in Eastchester, New York, entered into a Covenant of Agreement establishing the rules and regulations that would govern their community. The article concerning hiring a minister marked the beginning of Saint Paul's Church, first known as the Church at Eastchester, or Eastchester Church (the church changed its name in 1795 when it became incorporated, to "Saint Paul's Church, in the Town of Eastchester, in the County of Westchester, and State of New York"). The parishioners of Eastchester Church were dissenters; in 1702, they were placed under the aegis of the Church of England.

At some time after the Covenant of Agreement was established, a small building was constructed on the village green, on the site of the existing church. In 1700 a second church (which was later dismantled for firewood) was constructed northeast of the earlier building. Construction of the third church (that exists today) began in 1763 on the site of the first church (which burned down). Completion was delayed by lack of funds and the onset of the Revolutionary War. Following the Battle of Pells Point in 1776, the unfinished church was used as a military hospital and heated with wood fires made from the dismantled second-church structure. The new church was completed after the war.

The carriage house evolved over a number of years. Initially, it was simply a wall with iron rings for tethering horses. Later, the wall was incorporated into a building, which served the parish of Saint Paul's in a variety of functions.

The burying ground contains more than 9,000 interments, with burial plots and vaults of the first families in the area. The cemetery was used by whites and African Americans and is the resting place for soldiers of most of the wars that had American involvement — the men of the Eastchester militia who served during the 17th and 18th centuries, veterans of the French and Indian Wars, the American Revolution, the War of 1812, the Civil War, the Spanish-American War, and World Wars I and II. A mass grave at the back of the burying ground contains the remains of more than 100 Hessian soldiers who died in the church when it served as a hospital. Former parishioners and their descendants can still be interred here providing they hold a valid cemetery deed and there is space available in the family plot.

By the early 20th century, the neighborhood around Saint Paul's Church was being replaced by industry, resulting in the shrinking of the parish. In 1929 Harold Weigle was inducted as a rector of Saint Paul's. He recognized the church and surrounding burying ground as invaluable historic assets and that both were in dire need of maintenance and repair. Two years later, the first annual Descendants' Day service was held, which served as a rallying point for a movement to restore the church and burying ground; the response was overwhelming.

The first celebration resulted in the development of a restoration committee with the tasks of making and executing plans for the project and raising the necessary capital. Their goal was to "keep intact the stately church edifice which had come down from its colonial forbearers" and to maintain a well-landscaped burying ground. Sara Delano Roosevelt, mother of then-president Franklin Delano Roosevelt and a collateral descendent of one of the early vestrymen, agreed to chair the committee.

One major problem faced Weigle and the committee in their fund-raising efforts: there

was nothing associated with the church that would interest a nondescendant population in donating funds for preservation. After some searching, an event was found that was used to link the site to the Bill of Rights. The critical event was perceived to be a corrupt election, held in 1733, on the village green near the second church. A report of the election appeared in the *New York Journal*: John Peter Zenger was the printer. Zenger was charged with libel, not for that article but for publications that had nothing to do with the election; he was acquitted of the charge. Although there is apparently no chain of events leading from the village green to the creation of Bill of Rights, the case was made by Weigle and the committee that Zenger's acquittal was directly linked to article I, providing freedom to the press. The committee chose to make a connection between the site and the Bill of Rights and used this connection for a successful fund-raising effort.

The committee wanted the restoration to be regarded as a true representation of colonial architecture. The movement to restore the church to its colonial appearance represented a powerful movement in America to recover its colonial past. In 1941 Perry, Shaw and Hepburn, the architectural firm then restoring Colonial Williamsburg, was commissioned to carry out the work at Saint Paul's Church. Some architectural plans predating the 1850's modifications were used to guide the work, and a great deal of conjecture was used as well. Noncolonial features were removed and replaced with features considered to be appropriate to the colonial period. The burying ground was also altered to resemble its colonial appearance. The restoration was completed one year later.

The site was listed on the National Register of Historic Places on October 15, 1966, (with documentation following on March 22, 1983) for its "connection with the events leading to the establishment of the Bill of Rights, and its place in American architectural history and the American Revolution." It was authorized for inclusion in the national park system in 1978 (Public Law 95-625, section 504). In 1980 the church was deconsecrated by the Episcopal Church and ownership was transferred to the National Park Service. The site, opened to the public in 1984, is run under a cooperative agreement with the Society of the National Shrine of the Bill of Rights at Saint Paul's Church, Eastchester.

Site Description and Development

The church was built in a rectangular plan (32 by 45 feet) and a connected bell tower at the center of the west wall. Walls are 20 feet high and covered with a gable roof. The tower is 80 feet tall and capped with a sandstone, double-tiered cupola. A small addition was built onto the east wall. The church is built of coursed fieldstone with brick quoins and window and door surrounds. The roof is covered with ceramic tile, simulated to resemble wood shingles. There are two entrances to the church — one on the west (through the bell tower's vestibule) and one on the north, which is used as the primary entrance. Multipaned, round-arched windows surround the church, and a large multipaned round window is in the east wall. Little slit windows, as well as round-arched windows, are in the bell tower. A stone over the west door is inscribed with "1765."

The interior of the church is primarily one open space filled with pews. The pulpit is in the center of the south wall. A gallery with a pipe organ is supported by four columns on the west side. The chancel is within the addition. Behind the chancel is a narrow corridor and stairs leading up to a small office.

The one-story carriage house is about the same size as the church in area. It is also constructed of coursed fieldstone with brick quoins and window and door surrounds. The roof is a low gable, covered with asphalt shingles. Multipaned round-arched windows are along the north and south walls and on either side of the door on the west end. Two

brick additions, of the same massing as the rest of the building, are joined to the east end. There are no interior walls. The roof truss is visible, walls are whitewashed, a fireplace is on the south wall, and the floors are wood. Iron rings are placed in a row along the north wall. The first addition to the east contains offices and the second addition contains maintenance storage.

Construction on the church began in 1763 and lasted for about 40 years. The "1765" carved into the stone above the door may refer to the date the walls had reached this height. Construction was halted during the Revolutionary War; it had resumed by 1787, when pew sites were sold to the parishioners. In 1804 the gallery was finished, and in the following year interior walls were plastered. The bell tower had been finished with a wooden cupola surmounted by a gilded weather vane; the bell had been cast from the same foundry as the Liberty Bell. Fifty years later, major alterations began to be carried out: an addition was built onto the east wall for use as a sacristy, and the pews were replaced with benches facing the new pulpit or altar on the east. In the 1860s, the bell tower was raised by a story and capped with the existing cupola. It may have been around this time that stained-glass windows were installed.

Extensive alterations were made during the 1940s under the guidance of the architectural firm of Perry, Shaw, and Hepburn. The roof was replaced with ceramic tiles. The masonry wall between the nave and the addition was partially removed to allow for the creation of a chancel. Stained-glass windows were removed and replaced with multipaned sash. A round window was installed in the east wall. Benches were also removed and replaced with pews, placed according to the original plan.

The carriage house evolved over a period of time as well. It appears that the building began as a stone wall, with iron rings for tethering parishioner's horses fastened to it. Later, two wing walls of wood were added. In 1825, and then again in the following years, the wooden walls were replaced with walls of masonry. A fourth masonry wall was added and the structure was covered with a roof. The two additions were constructed during the 20th century.

The burying ground has grown over the years to an area covering several acres. The sequence of expansions can be somewhat delineated by charting gravestone age and type. Records indicate use of the burying ground in the 17th century; however, no stones from this time are visible. It is possible that early stones are buried on the site. The earliest visible gravestones, dating from 1702 to about 1750, are of roughly-hewn fieldstone. During the same period, limestone gravestones were used as well and are characterized by their similar shape. Some 18th century stones are also made from sandstone. Marble was common for 19th century graves, and granite was used for both 19th and 20th century graves. Iron railings surround family plots, and a row of crypts are along the eastern edge of the site.

Before the 1850s, burying grounds were characterized by gravestones arranged in a somewhat haphazard manner; it was only later in the century that stones were arranged in rows. Frequently older stones were removed and repositioned into rows. Such alterations were carried out at Saint Paul's, but it is not known to what extent or exactly when. Alterations were made again in the 1940s: in an effort to restore the site to its colonial appearance, noncolonial stones were taken out of the ground and laid down flat.

Museum Collections

A portion of the Saint Paul's Church collection is stored at Federal Hall. The onsite collection is stored mostly on the second floor of the church. The collection contains 19th and 20th century church archives (including burial records), archeological materials, furniture, liturgical

materials, and a library. The collection also contains architectural artifacts and tomb statuary removed from the burying ground, some of which are stored in the church basement.

Ethnographic Resources

Ethnographic data about St. Paul's Church has not been compiled. To expand information about the site's ethnographic resources and contemporary groups that are traditionally associated with Saint Paul's Church, a future study would be conducted (see "Actions Common to All Alternatives" section).

NATURAL RESOURCES

The general natural resource description for the Manhattan Sites discussed earlier is applicable to the type of resources found at the Saint Paul's Church site. Resource characteristics known to occur within this unit include the following.

Vegetation

The 6 acres of open space at the Saint Paul's unit is landscaped and maintained, which is typical of an urban setting. The cemetery and surrounding grounds have been planted with grasses and a variety of shrubs and trees interspersed throughout the grounds. These hardwood species include trees such as ash, elm, locust, mulberry, Norway maple, red maple, and wild cherry. The park has documented over 75 individual trees on the site, many of which are older and require routine maintenance such as pruning and hazardous limb/tree removal.

Wildlife

The wildlife species at Saint Paul's Church are typical of those residing in and using the urban/open space habitat. Due to the limited open space within the city, wildlife species have used the grounds surrounding Saint Paul's Church as a refuge. Black and grey squirrels have been observed in the park and use its habitat for residential purposes. Other small mammals on the site include mice and rats. Insects associated with the unit are similar to those described for other sites and are considered pests in an urban setting. The avifauna are typical of the city environment, and species present include sparrows, starlings, and pigeons.

Floodplains

The site, between the 100- and 500-year floodplain, is protected by levees from the base flood. The church is about 240 to 500 feet west of the floodprone area identified as zone A10 on the Federal Emergency Management Agency map. This zone is an area where the base flood elevations and flood hazard factors were determined to be at about 14 feet above mean sea level. The source of floodwaters at the site would originate at the Hutchinson River. The applicable flood insurance rate map for the site is for the city of New York, New York; Bronx, Richmond, New York, Queens, and Kings Counties, panel 54 of 131, community panel number 360497 0054 B, effective date November 16, 1983.

Threatened and Endangered Species

Consultation with the U.S. Fish and Wildlife Service field office in New York and the Significant Habitat Unit of New York Department of Environmental Conservation revealed that, except for occasional transient individuals, no species listed on federal or state lists as endangered or threatened plant or wildlife species, and no species proposed for listing, are in the vicinity of Saint Paul's Church (see appendix D).

SOCIOECONOMIC ENVIRONMENT

Saint Paul's Church is in the city of Mt. Vernon in the southern part of Westchester County, just north of the Bronx. Mt. Vernon is an important industrial center that supports activities related to the production of apparel, electronics, machinery, food, fabricated metals, chemicals, precious metals, and printing.

The population of the 4.24-square-mile city is 67,153 (1990 census). The median household income is $34,850, the lowest median income in the county. Per capita income averages $15,835. About 11% of all families are below the poverty level.

COOPERATORS

The Society of the National Shrine of the Bill of Rights at Saint Paul's Church, Eastchester, Inc., is a nonprofit membership corporation established to perpetuate interest in and commemorate events that took place at Saint Paul's Church and to develop and maintain facilities at the site. When the society was incorporated, Saint Paul's Church was still an active parish of the Episcopal Church. Today this traditionally associated group preserves, protects, maintains, and operates the site under a cooperative agreement with the National Park Service. The society fulfills its obligations through a professional staff and defrays the cost of this through available revenues. All society activities must conform to NPS policies, standards, and guidelines. The National Park Service provides technical and professional assistance to the society and provides appropriated funds to the society for site operation.

The society itself is composed of representatives from historic, civic, and religious organizations, including the Bronx County Historical Society, City of Mount Vernon, Eastchester Historical Society, Episcopal Diocese of New York, Huguenot-Thomas Paine Historical Association, Interfaith Clergy of Mount Vernon, International Garden Club, Pelham Historical Society, Steuben Society of America, and Westchester County Historical Society.

REGIONAL LAND USE

The zoning district map for Mount Vernon designates the area containing the church and cemetery as a general industrial district. Although the site and its purpose may be inconsistent with city zoning, the site predates the existence of the city zoning ordinance and therefore is legally within the industrial district. Existing land uses are stable in the area and are predominately small industries and commercial enterprises, with limited retail use. Businesses and industrial activities adjacent to the site have included, among others, a number of oil companies with aboveground storage tanks; a variety of manufacturing companies; trucking companies; and the Salvation Army.

It is unknown what effects, if any, the bordering oil companies or other industries with waste products have on the Saint Paul's site.

CARRYING CAPACITY

The carrying capacity at Saint Paul's Church is 150 people, which is based on safety regulations and preservation of the resources.

NPS OPERATIONS

There are four full-time employees, and the annual operating costs are about $265,000.

TRANSPORTATION AND PARKING

Saint Paul's Church is accessible by car via the Hutchinson River Parkway. It is also accessible by indirect city bus lines or an excursion bus service. Although there are no subway lines that access the site from

Manhattan or any of the other boroughs, the Penn Central and the Penn Central New Haven Line railroads also go into the area.

Very limited parking is available on the half-circle driveway adjacent to the church. During special events, parking is often available across the street in the parking lot of a local business.

VISITOR USE AND INTERPRETATION

Saint Paul's Church is open year-round. Tours, which include the church, grounds, and cemetery, are provided during the week for schoolchildren and other groups by volunteers. On weekends, regular tours for visitors are provided by the society. The school groups visit from area schools through the outreach program. Specialized tours and programs are focused on specific events that are pertinent to Saint Paul's history and that are relevant to the student course work.

Visitation is highest in summer because of weather and special event programming. School group use is heavy in spring and fall.

Visitors stay about two hours, and the tour lasts anywhere from ¾ to 1¼ hours, depending on the interests of visitors. The balance of time is spent seeing museum exhibits in the carriage house and walking around the cemetery and grounds.

The exhibits that related to the trial of John Peter Zenger (formerly displayed at Saint Paul's), which were originally designed for and installed at Federal Hall, have been relocated to Federal Hall, where that story can be more accurately interpreted.

TABLE 12. SAINT PAUL'S CHURCH, VISITATION

Year	Visits/Year
1990	4,302
1991	6,937
1992	5,494
1993	3,577
1994	4,152

NOTE: Visitation is counted by park ranger or volunteer with counting device at site entrance. For special events, the number of people that fill one area is multiplied by the number of areas that are the same size and also filled with people.

IMPACTS COMMON TO BOTH ALTERNATIVES

Impacts on Cultural Resources

Impacts on Museum Collection. Adding proper climate controls and developing storage and pest management plans and a conservation program would help preserve the collection. Without funding for a consistent preservation maintenance program, the resources could deteriorate.

Impacts on Ethnographic Resources. An ethnographic overview and assessment would

- provide a foundation for evaluating how future actions would include or affect ethnographic resources
- allow the National Park Service to become more active with the neighborhood by sharing management information on site resources on an continuing basis
- provide an information base for and understanding of the existing traditional uses of the structure and within the area of Saint Paul's Church
- take into account the contemporary concerns of neighboring groups about park operations and provide for channels of communication and cooperation with the various groups identified
- identify gaps in available data and provide an annotated bibliography, which could be used in future park operations and management

Impacts on Historic Landscape. The addition of the waysides in the cemetery would require the installation of a wheelchair accessible path system. Designed and installed correctly, this path would not impact the landscape of the cemetery. The informal picnic and receiving area that is proposed for the village green area in front of the church would be designed to be compatible with and not intrude on the surrounding landscape. The impacts of future actions recommended in the cultural landscape report are unknown.

Impacts on Archeological Resources. It is not anticipated that the actions under this alternative would impact any archeological resources. The widening of the driveway would occur on previously disturbed areas. The addition of new paths through the cemetery could potentially disrupt archeological resources, but negative impacts would be avoided by monitoring construction activities to ensure that such resources would not be affected.

Impacts on Natural Resources

Overall, impacts would be minor. Some impacts expected would be in conjunction with widening the driveway access to enhance traffic flow into the receiving area and its associated picnic setup. Other impacts would include removal of nonnative grasses used for landscaping purposes and a type conversion into a paved surface. This action would cause short-term impacts on the small mammals through site displacement during construction and would not change the species composition on site. This impact would also be mitigated by the enhancement of traffic flow into the receiving area and picnic site. Appropriate drainage would be provided to ensure that runoff from storms would be directed into the city drainage system and would not impact the Long Island Sound area. Increases in surface runoff would be considered insignificant. There would be minor impacts such as compaction on the soils associated with access road grading, widening, and paving. The impacts of future actions recommended in the cultural landscape report are unknown.

The short-term air quality impacts — fugitive dust/fine particulate matter during

construction — would be mitigated through appropriate watering techniques. Construction equipment would be also properly maintained and serviced to minimize exhaust emissions. Any associated temporary emissions from the construction equipment would be less than the conformity de minimis levels established for carbon monoxide and ozone within the region in accordance with the Clean Air Act.

Protection of gravestones within the cemetery might require the removal of some vegetation. The trimming and in some cases stabilization of large trees would benefit the trees and other cultural and natural resources in the area.

In addition, species could be impacted by proposals made in the cultural landscape report. It is beyond the scope of this document to evaluate the impacts that could be associated with that report because it would require further study, analysis, and review before implementation. Therefore, any impacts on natural resources from implementing a future cultural landscape report would be addressed in that report and accompanying environmental compliance.

Impacts on Threatened or Endangered Species. The no-action alternative would not affect any species listed as endangered or threatened or habitat considered critical by the U.S. Fish and Wildlife Service or the Significant Habitat Unit of New York Department of Environmental Conservation. No known threatened or endangered species or their associated habitat have been documented at Saint Paul's Church. Except for occasional transient individuals, no species listed or proposed for listing as endangered or threatened on state or federal lists or by other state and city regulatory agencies, are known to exist in the project area. Therefore, no biological assessment or further section 7 consultation under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) is required with these agencies.

Impacts on Coastal Zone Management. With required concurrence with New York's coastal zone management program, there would be no impacts on coastal zone management.

Impacts on Visitor Use

Accessible paths would be a benefit to all visitors, as would new accessible interpretive media.

Impacts on Transportation/Parking

A cooperative agreement between the National Park Service and an adjacent business for use of their parking lot would be a positive impact on the management and visitor use of the site. Terms to be agreed upon by the parties would be beneficial to both sides. The parking would be used for overflow and bus parking when needed. This would result in less congestion along the site's driveway and would provide more visitor safety.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

No significant impacts would be expected. The proposed removal of trees and shrubs that are damaging headstones and crypts could irreversibly and irretrievably impact the cultural landscape. However, mitigation is proposed through providing protection to a even more significant historic resource, the headstones and crypts being damaged by this vegetation's root systems.

ALTERNATIVE 1

Impacts on Cultural Resources

Impacts on Historic Structures. This alternative would not introduce any elements or perpetuate any actions that would affect the historic fabric, construction, or integrity of the interior or exterior of the church or the carriage house. The church and the cemetery would be preserved.

Impacts on Museum Collections. The continued storage of part of the onsite collection in the church basement would continue to put that part of the collection at risk. When adequate space is found, moving this part of the collection out of the floodplain would be a positive impact. The part of the collection at Federal Hall that would be stored in improved conditions on the third floor where there is space for conservation work would be preserved and protected. Inadequate facilities would not allow onsite storage of the complete collection or space for conservation work.

However, the offsite collection would benefit from relocation to improved area with workspace for conservation within Federal Hall.

Impacts on Ethnographic Resources. Actions associated with this alternative would not impact any known associated ethnographic resources; however, the ethnographic study would provide more data on associated ethnographic resources.

Impacts on Historic Landscape. The actions of this alternative would not further impact the landscape that surrounds the church and includes the cemetery. The site is surrounded with light industrial structures and parking lots, and the landscape of the church is contained within the site's boundaries.

Impacts on Archeological Resources. No additional impacts would be expected.

Impacts on Natural Resources

No additional impacts would be expected.

Impacts on Floodplains. Saint Paul's Church is in the floodplain. (The gravestones, crypts, and cemetery are excepted from Executive Order 11988, "Floodplain Management" because "this guideline does not apply to historic or archeological structures, sites or artifacts whose location is integral to their significance.")

In compliance with that executive order, most of the onsite museum collection (archival, historical, and archeological) would continue to be stored above the base flood elevations and flood hazard factors determined for the site — 14 feet above mean sea level. Conforming with the spirit of that executive order, the park staff would cooperate with New York City and state agencies to develop and annually update the evacuation plan for park visitors to ensure their safety from potential storm surges while on site.

In compliance with Executive Order 11988, "Floodplain Management," a statement of findings would be required for actions proposed by this alternative. This would be included in the final *General Management Plan / Environmental Impact Statement.*

Impacts on Regional Land Use and Visitor Facilities

Actions proposed in alternative 1 would not affect local or regional land uses, or nearby visitor facilities.

Impacts on Socioeconomic Environment

Actions proposed in alternative 1 would not affect the current socioeconomic character of Mt. Vernon or the area immediately surrounding Saint Paul's Church.

Impacts on Visitor Use and Interpretation

The actions proposed by this alternative would improve the visitor experience. Directional signs would make the site location easier to find. The picnic area would provide a gathering spot for tour and school groups before they enter the site. Wayside panels would improve the self-guided tours and allow a better understanding of the site's resources. The upgraded interpretive exhibits and the expanded outreach program to schools would provide a more comprehensive understanding of the site's history, which would be a positive impact on the visitors' experience.

Impacts on Cooperators

The current management arrangement between the Society of the National Shrine of the Bill of Rights and the National Park Service would continue with few changes; therefore, this alternative would have no effects on the society.

Impacts on Site/NPS Operations

There would be no impacts on existing operations.

Cumulative Impacts

Because Saint Paul's Church is the only national park system unit in this area and other park resources are limited, the expanded interpretive programs would have a positive impact on area schools; students would be provided with a more comprehensive history of the site.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

No additional impacts.

ALTERNATIVE 2 — PROPOSED ACTION

Impacts on Cultural Resources

Impacts on Historic Structures. The actions of this alternative would not impact any exterior or interior historic elements or fabric of the church, the associated cemetery, or carriage house. The church and cemetery would be preserved.

Impacts on Museum Collections. Under this alternative, the collection, including the portion stored at Federal Hall, would be positively affected as increased curatorial space would provide adequate storage out of the floodprone area. There would also be enough space to conduct preservation maintenance and repair to resources, such as the gravestones, which would be a positive impact on the preservation of some of these deteriorating resources.

Impacts on Ethnographic Resources. No known impacts would be expected. Future research and documentation of the ethnographic resources associated with the site would provide more data. The installation of the fence could have a negative impact on related ethnographic groups.

Impacts on Historic Landscape. Although the site's landscape elements would remain intact under this alternative, the site perimeter security fence could affect the site's appearance by making it seem forbidding. However, the type of fencing installed would be wrought iron, which would be compatible with site's resources.

Impacts on Archeological Resources. Because the fence would be constructed

around the entire site, including the cemetery, there is a possibility for uncovering archeological resources. To avoid any negative impacts, construction activities would be monitored to ensure that archeological resources would not be affected.

Impacts on Natural Resources

There would be no additional impacts.

Impacts on Floodplains. Impacts described for alternative 1 would apply to this alternative. However, this alternative specifies that the curatorial collection would be relocated from the site to rented or acquired space close to Saint Paul's Church. In compliance with the executive order for floodplain management, this facility would have proper climate control and security and be outside of the 100- and 500-year floodplain for compliance purposes.

Impacts on Regional Land Use and Visitor Facilities

Space near the site would be acquired or rented for parking and curatorial storage and resource conservation work. Such acquisitions or leases would not displace current businesses or other uses because only available space would be sought.

Impacts on Socioeconomic Environment

Special programs, such as performing arts and community events, would be of social, educational, and cultural value to the local community. Such programs could also create additional awareness of the site and its purpose within the community.

The addition of the security fence around the site could have a negative affect on adjacent neighbors and the local community by creating a sense of inaccessibility.

Impacts on Visitor Use and Interpretation

As in alternative 1, the actions proposed by this alternative would improve the visitor experience. Directional signs would make the site easier to find from the roadways. The picnic area would provide a gathering spot for tour and school groups before they enter the site. Wayside panels would improve the self-guided tours and allow a better understanding of the site's resources. The upgraded interpretive exhibits and the expanded outreach program to schools would provide a more comprehensive understanding of the site's history, which would be a positive impact on the visitors' experience.

The security fence, although offering site security, might cast a feeling of inaccessibility.

Impacts on Cooperators

This alternative would reduce the responsibilities of the Society of the National Shrine of the Bill of Rights, Inc. Rather than the society operating the site, the National Park Service would assume most of that role, with the society providing staff support. The number and types of jobs available could change; and, instead of being employed by the society, individuals would be employed by the National Park Service and the society. The society's role in the operation and management decisions would lessen under this alternative.

Impacts on Site/NPS Operations

Under this alternative, site operations and management would be the responsibility of the National Park Service with assistance from the society. This would have an impact on the amount of staff needed at the site, as well as the functions of the society.

The addition of the security fence would be a positive impact on the management and

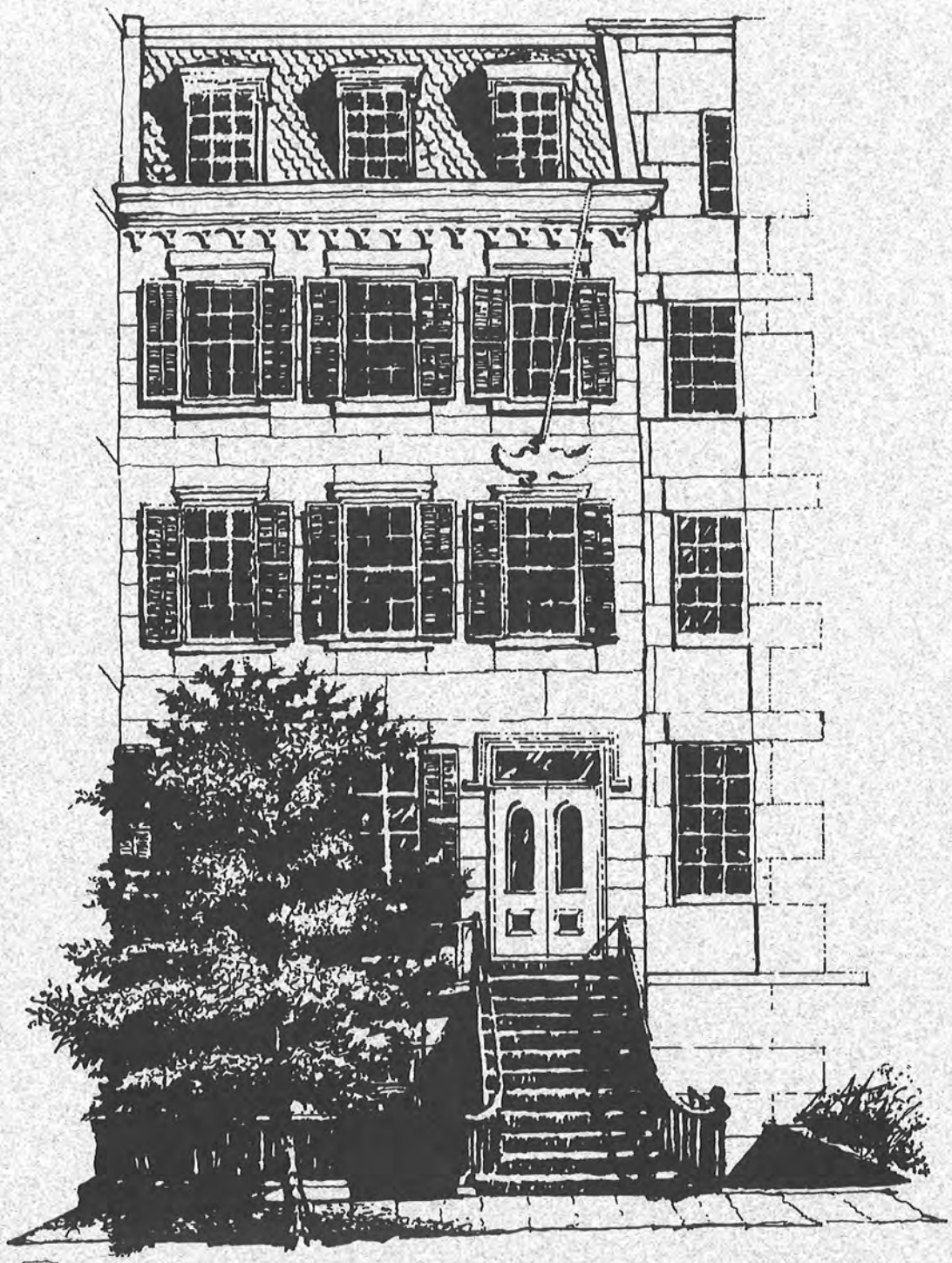
security of the site because vandalism to the resources would be deterred.

Cumulative Impacts

The cumulative impacts under this alternative would be the same as alternative 1 — expanded interpretive programs would have a positive impact on area schools and students could have a more comprehensive history of the site. Furthermore, the site would benefit area researchers and school programs with the addition of the research program.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

There would be no known additional irreversible and irretrievable commitments of cultural resources associated with this alternative.



NATIONAL PARK SERVICE
DEPARTMENT OF THE INTERIOR

Theodore Roosevelt Birthplace

National Historic Site

Manhattan Site • New York

PURPOSE OF AND NEED FOR THE PLAN

SITE DESCRIPTION AND BACKGROUND

Theodore Roosevelt Birthplace National Historic Site is in the Gramercy Park area of Manhattan at 28 East 20th Street (see Theodore Roosevelt Birthplace Neighborhood map). The 0.11-acre site is occupied by a building rebuilt on exterior as if it were two, four-story adjoining brownstone townhouses. On the interior, the two townhouses are connected as one. The site is commonly referred to as the birthplace. The district is predominantly commercial, represented by retail and wholesale businesses as well as light industry; the site is flanked by taller commercial/residential buildings.

The building is a 1923 reconstruction of the birthplace of the 26th president of the United States, Theodore Roosevelt Jr., who was born on this site on October 27, 1858, and lived here until he was 14 years old. The interior reflects the atmosphere of the original birthplace through five period rooms of mid-19th century design and furniture. The rest of the building contains museum galleries, a library, an auditorium, and support facilities.

Reconstructing the birthplace was the responsibility of the Women's Roosevelt Memorial Association, with funding and support from the Roosevelt Memorial Association. In creating a site to perpetuate Theodore Roosevelt's ideals and memory, the association also created a site that became a significant example of the development of historic preservation efforts in the United States. The reconstruction of the birthplace was designed by a well-known architect, Theodate Pope Riddle. The construction techniques, materials, and mechanical systems represent 1920s museum design, 1920s technology, and fine workmanship.

SIGNIFICANCE

Theodore Roosevelt Birthplace National Historic Site, rebuilt shortly after Roosevelt's death, consists of a building designed as two reconstructed townhouses with one reminiscent of Theodore Roosevelt's childhood home and the other created as a museum. The building has period rooms containing furniture from the original house as well as extensive exhibits, memorabilia, paintings, a library, and an auditorium. The site is a tribute to Roosevelt and portrays the years of his early life as well as his illustrious adult life and career.

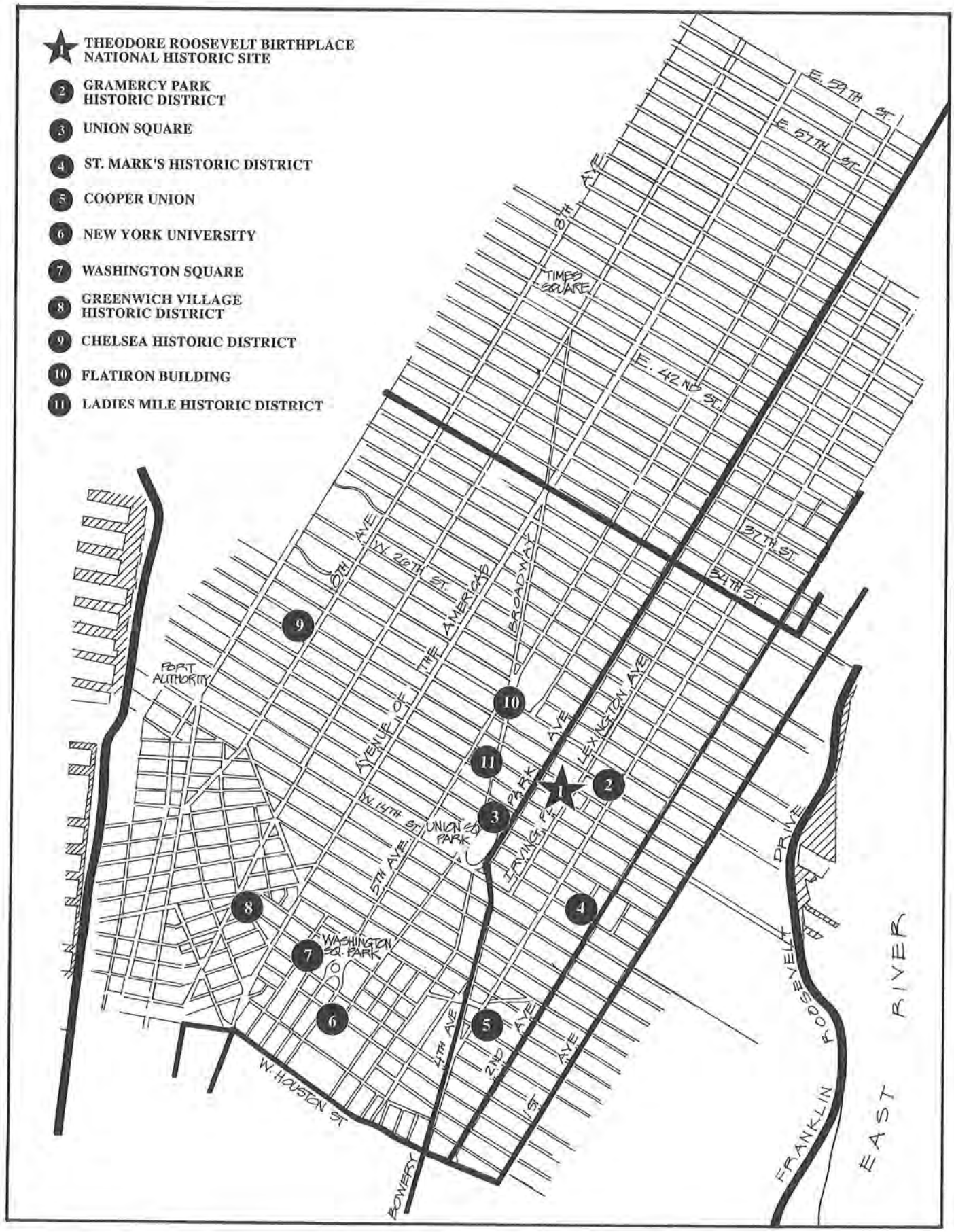
PURPOSE AND NEED

The purpose of the plan is to ensure the preservation of and guide the future management of Theodore Roosevelt Birthplace National Historic Site and to encourage increased visitor use through improving the site and its infrastructure and extending the hours of operation.

ISSUES TO BE ADDRESSED IN THIS PLAN

The site, especially the library, is underused. This is a result of a number of limitations, including lack of public awareness and climate control and inadequate staffing. Future uses need to be evaluated, infrastructure requirements for these uses need to be defined, and extended operational hours need to be implemented. Additionally, interpretation of Roosevelt's life needs to be presented in a context that is more pertinent to contemporary times.

The lack of central air-conditioning and/or climate control creates adverse conditions for staff and visitors. There are summer days when areas of the building must be closed for visitor and staff safety due to the heat.



NEIGHBORHOOD

Theodore Roosevelt Birthplace

National Historic Site

United States Department of the Interior/National Park Service

DSC / Jan. 1996 / 420 / 20,022

NORTH

0 1/4 1/2 MILE

The temperatures also severely affect the storage and exhibition of museum collections. The use of the fourth floor auditorium is limited in the summer due to hot temperatures in the building.

Graffiti and vandalism sometimes occur on the exterior of the building and are a management concern.

The site is unaccessible in some areas to visitors and employees with disabilities. Both must be assisted to access the building and the lower museum. The fourth floor auditorium is totally unaccessible to visitors with disabilities.

ALTERNATIVES FOR DEVELOPMENT AND PRESERVATION OF THEODORE ROOSEVELT BIRTHPLACE NATIONAL HISTORIC SITE

INTRODUCTION

Interpretive themes, objectives, and three alternatives have been developed for managing and preserving Theodore Roosevelt Birthplace National Historic Site. Alternative 1, a no-action/continuation of existing management alternative, would continue existing site management. Alternatives 2 and 3 describe different management options and site uses. Theodore Roosevelt Birthplace contains unique and fragile resources that would be protected and interpreted under any of the alternatives.

Interpretive Themes

The interpretation of Theodore Roosevelt Birthplace would focus on the history and accomplishments of Theodore Roosevelt from childhood to adulthood — as an author, New York state assemblyman and governor, naturalist, historian, rancher, Rough Rider, explorer, statesman, vice president, and the 26th president of the United States. Roosevelt was born and raised in a townhouse on this site for his first 14 years of life. He overcame many of the physical limitations of his childhood by developing many interests that were to continue to influence him through his adult life. Following are the interpretive themes for the site:

- Theodore Roosevelt overcame many physical challenges in his early childhood through the development of his physical strength and endurance, as well as the development of his intellect, with an appreciation of history and science.
- Theodore Roosevelt led an active life, his early experiences at this site shaping his military and political career as well as contributing to his interest in exploring, writing, and conserving natural and historic resources.
- Theodore Roosevelt grew up in Victorian New York society in the fashionable area of Manhattan, where he was exposed to cultural events through his family's societal involvements.
- The reconstruction of the birthplace has an interesting architectural history, which presents an example of the early historic preservation movement.

The difference in the interpretation of these themes in the three alternatives would be the depth of interpretation. Alternative 1 would continue existing interpretation of the themes. Alternative 2 would provide more in-depth interpretation of the themes, and alternative 3 would provide more space, which would allow for the most in-depth treatment of each theme.

Visitor Experience

The National Park Service has the following goals for visitors.

- Visitors could learn about the national parks and Roosevelt's contribution to federal land preservation, as well as the commemoration of Roosevelt at other national park system sites.
- Visitors could learn that this site is the only Roosevelt memorial and museum established by Roosevelt's family and close associates and that the most comprehensive collection of Roosevelt memorabilia is at this site.
- Visitors could help conserve and preserve the site's structure and collections because they would be aware of the importance and fragility of site resources

- Visitors could learn about role of the birthplace in historic preservation and as a national monument, as well as the importance of the survival, preservation, and protection of other such sites and the role of the National Park Service in such efforts.

- Visitors could benefit from interpretive and cultural programs, achieved through cooperation with various civic, historical, and cultural groups, that promote appreciation of Theodore Roosevelt Birthplace and nearby historical resources.

ACTIONS COMMON TO ALL ALTERNATIVES

The quality of the visitor experience to this site would be enhanced through some form of climate control. The site would be open seven days a week, and more outreach programs and community/friends groups would be established. The site supervisor would continue to be involved in community relations. The National Park Service would work closely with the cooperator and local community organizations to continue to schedule appropriate public use of the fourth floor auditorium and would expand efforts to promote the site among local schools and through tourist organizations.

Providing unaided accessibility into the structure, done to the fullest degree possible and in conformance with historic preservation policy, would be achieved with the installation of a ramp on the basement level, the main entry level into the structure. A ramp system would also be added to the lower museum and the Rough Rider room. Although this would allow access into these rooms, some of the historic exhibit cases might not be at an accessible viewing level for all visitors.

Updated brochures and an information board would be provided. The brochures and information board would have multilingual information and be accessible to those with visual limitations. The information board would include the history of the site, the schedule for tours and special events and programs, and a map and location of other national park system sites. A wayside exhibit outside the structure, also accessible to all visitors, would provide a brief history of the site. Exhibits and audiovisual materials would be upgraded and accessible to non-English-speaking visitors and visitors with disabilities.

The exhibited materials in the lower museum and in the Lion's room would be periodically rotated due to their sensitivity to light and heat. The collection monitoring system would continue to be used. The collection management plan would be updated.

The Theodore Roosevelt Association, a cooperator with the National Park Service, would continue to use the site and its auditorium for special programs and cultural events. The association would also continue to be involved in the preservation and conservation of the structure and its extensive museum collection. The American Landmark Festival would continue its concerts through an informal agreement.

To acquire more knowledge about contemporary groups and descendants that are traditionally associated with Theodore Roosevelt Birthplace, an ethnographic overview and assessment would be done. This study would provide baseline data and include a research and consultation plan to identify and contact the relevant groups associated with the site. Until this study is completed for Theodore Roosevelt Birthplace, the park would continue to recognize and maintain relationships that are based on respect for differing lifestyles, ethnic preferences, cultural diversity, and social groupings that are associated with the site and the surrounding area.

Part of the third floor would be used for NPS administrative offices and cooperator space, and part would be used for curatorial storage and conservation.

All actions of this alternative would occur within NPS policies and guidelines pertaining to historic structures.

ALTERNATIVE 1: NO ACTION / MINIMUM REQUIREMENTS

Alternative 1, the continuation of existing management, would meet minimum requirements; there would be little change to the site. The main activity would continue to be the scheduled tours of the period rooms on the first and second floors, which would continue to be preserved. Additional window air-conditioners would be installed at the rear of the house. The exhibits would remain much the same (except for periodic rotation). The objects and documents on exhibit would have improved preservation treatment.

The museum collection that is not on display would continue to be stored and curated in the western halves of the second and third floors (see Alternative 1 — Existing Conditions map). Portable humidification equipment would be used to help preserve the collection in storage.

The elevator would continue to allow access to the first three floors. The fourth floor auditorium would remain unaccessible to visitors and staff with disabilities.

The site would continue to be managed as a historic zone. The staffing under this alternative would continue to require four full-time employees and annual operational costs of about $185,000. Costs for implementation and interpretation would be about $264,000, the least of all the alternatives.

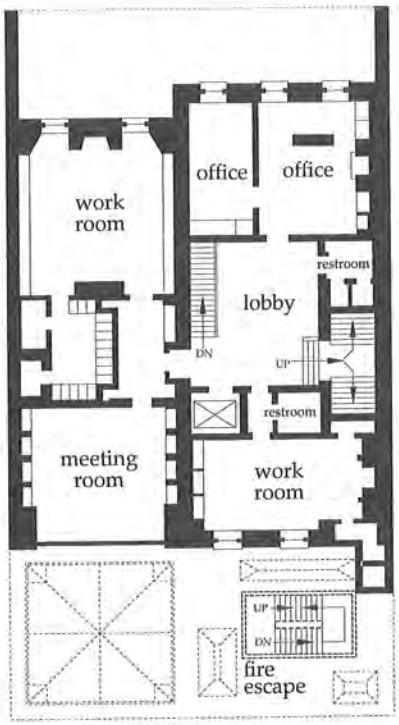
ALTERNATIVE 2: PROPOSED ACTION — ENHANCEMENT OF VISITOR AND INTERPRETIVE FACILITIES

Alternative 2 would be a significant enhancement of the programs, interpretation, and facilities at the site. The visitor services area on the basement level with the information/sales desk and restrooms would be rehabilitated/reconfigured to better accommodate visitors and provide a more comprehensive introduction to the site (see 157 Alternative 2, Preferred Floor Plans). A central air-conditioning system would be installed, with a museum-standard climate control system in the collection storage area, would be installed. Special care would be taken to insert the systems within the existing structure — in concealed spaces behind paneling, soffits, and if necessary, on the outside in the rear of the building — and to place air-handling equipment in the basement and/or on the roof in a way that would not intrude on the designed appearance of the site. The staff area at the rear of the basement would remain.

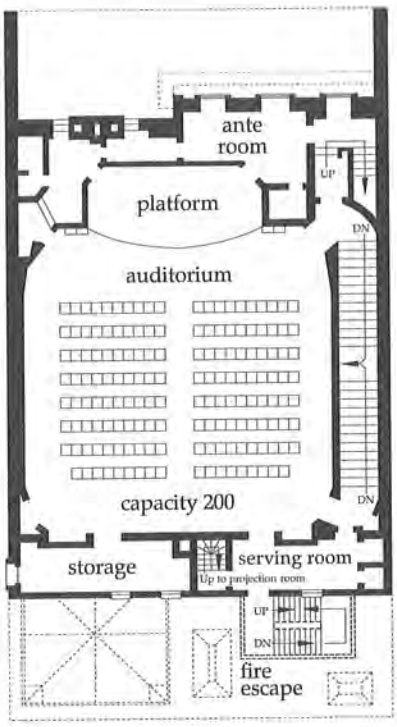
Additional exhibits and publications would bring Theodore Roosevelt's life into the context of contemporary life. The period rooms on the first and second floors would continue to be preserved.

The library on the second floor would be restored in part to its 1923 appearance, using original furnishings now stored in the basement and on the third floor. A resource and educational center of site-related archival materials would be developed in the library. The research facility would be open to researchers and visitors alike on a scheduled or appointment basis. The western half of the second and third floors would continue to be used for curatorial storage and conservation. Modern museum storage equipment would be installed as needed and as funds become available. Part of the third floor would be used for NPS administrative offices and space for the cooperators.

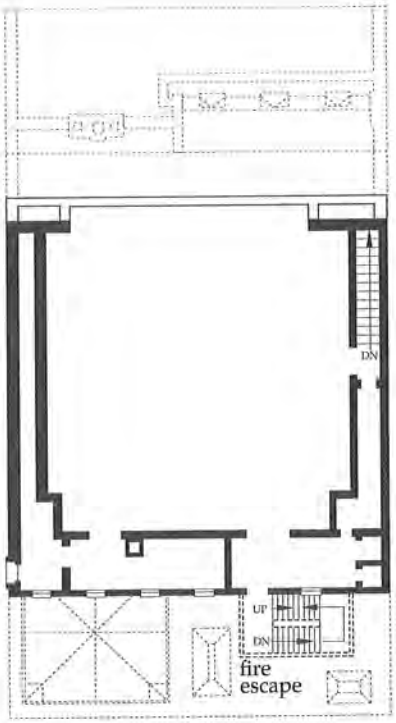
Along with the entrance ramp and ramps in the lower level museum and the existing elevator for circulation between the first three floors, a closet elevator would be installed from the third to the fourth floor to allow mobility impaired visitors and staff access to the entire house (except for a few exhibit cases).



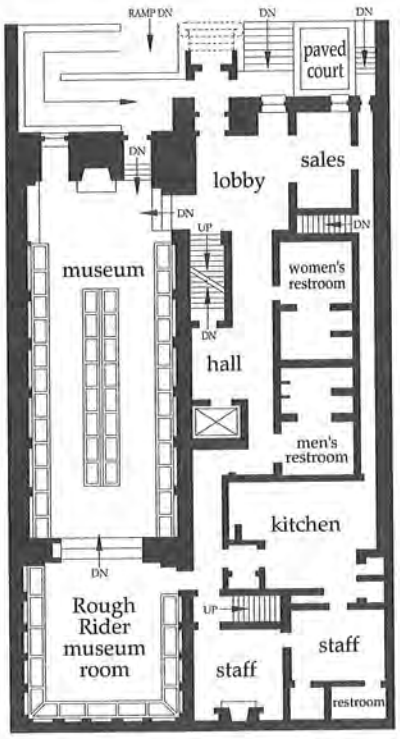
Third Floor



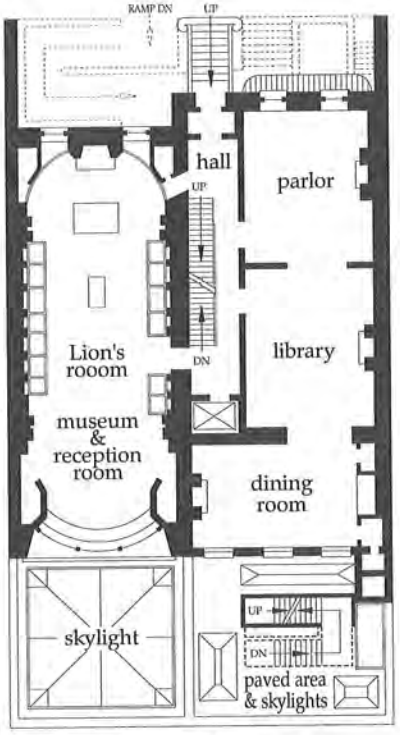
Fourth Floor



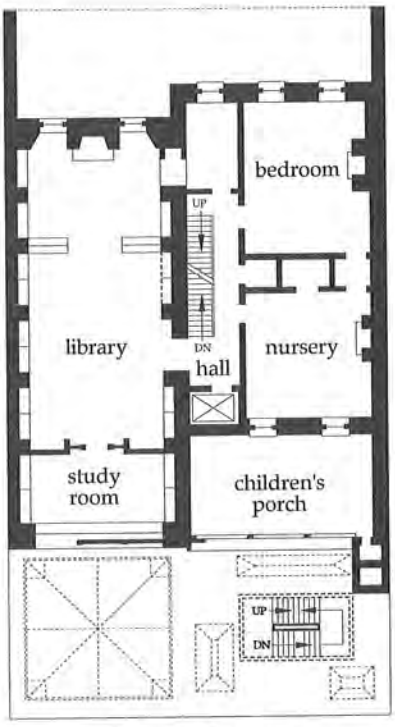
Roof Terrace & Garden



Basement Level



First Floor



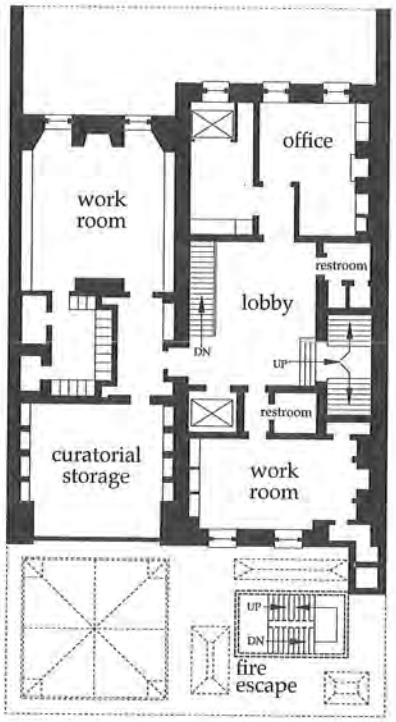
Second Floor

ALTERNATIVE 1
EXISTING CONDITIONS

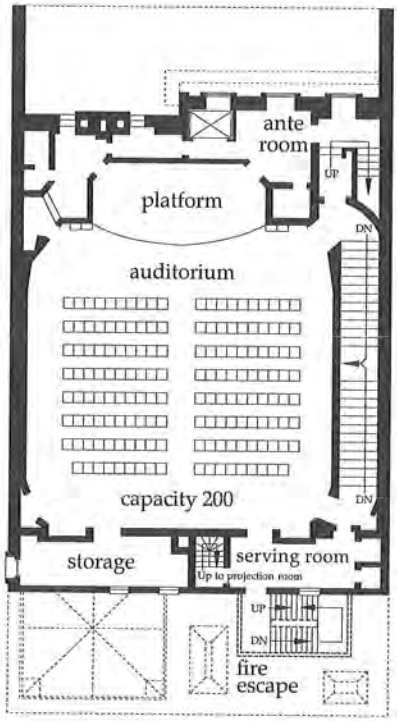
Theodore Roosevelt Birthplace

National Historic Site
United States Department of the Interior/National Park Service
DSC / 420 / Dec. 1995 / 20,018A

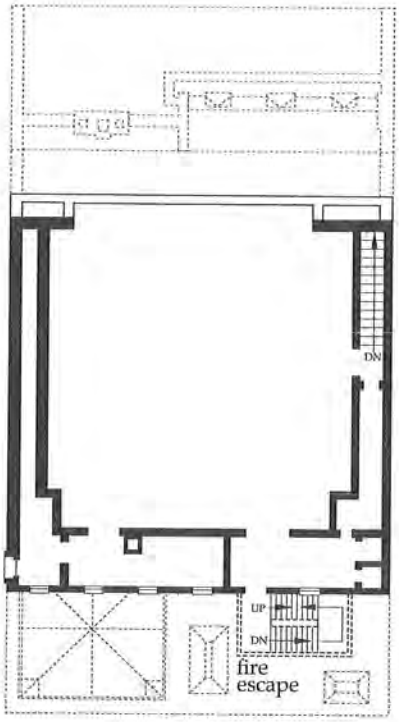
NO SCALE



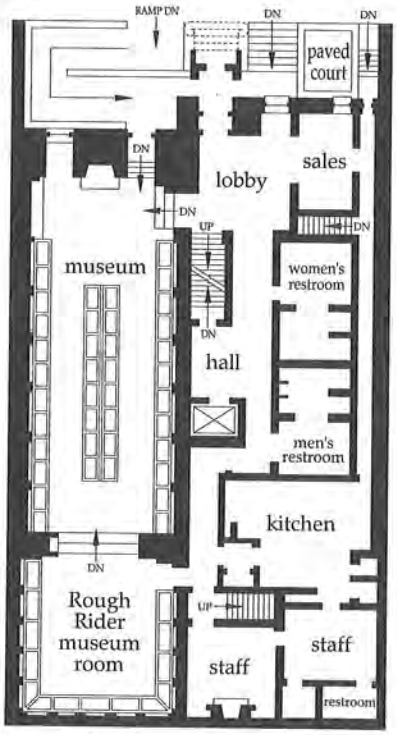
Third Floor



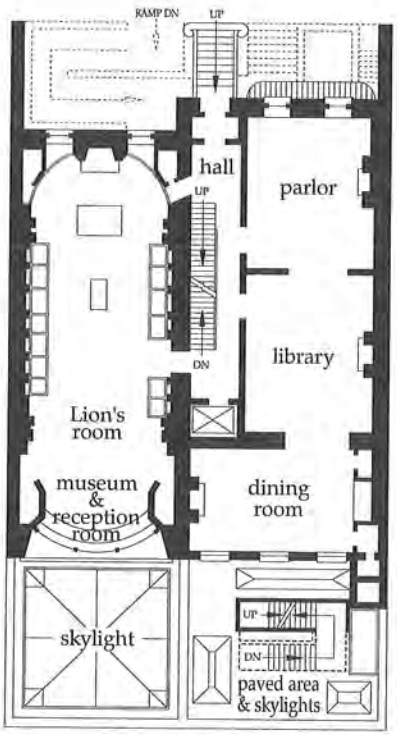
Fourth Floor



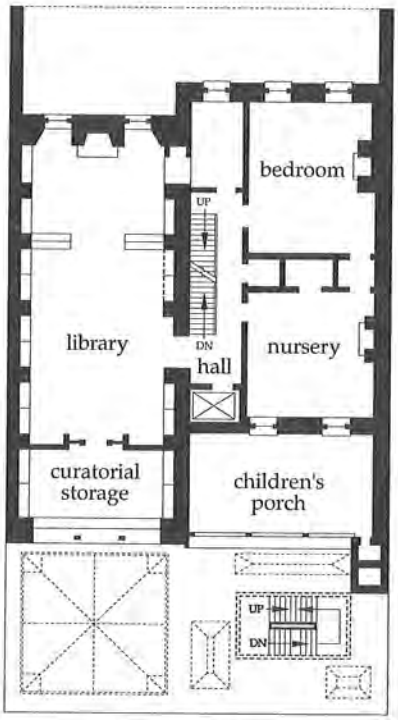
Roof Terrace & Garden



Basement Level



First Floor



Second Floor

ALTERNATIVE 2
PROPOSED FLOOR PLANS

Theodore Roosevelt Birthplace

National Historic Site
United States Department of the Interior/National Park Service
DSC / Sept. 1996 / 420 / 20,019A

NO SCALE

The site would continue to be managed as a historic zone. Five full-time employees would be needed for this alternative, and annual operational costs would be about $225,000. This alternative would cost more to implement than alternative 1 but less than alternative 3, requiring about $1,240,000 for implementation and interpretation.

ALTERNATIVE 3: FULL SITE ACCESSIBILITY

Alternative 3 would provide complete physical accessibility throughout the structure (except for a few exhibit cases), including the auditorium level, in conformance with historic preservation policy (see Alternative 3, Full Accessibility). A modernized elevator system would be installed from the basement level to the fourth floor auditorium. This would require an addition to the rear of the building for the elevator shaft. The rear walls on the first, second, and third levels would be extended to facilitate additional interior room space and the elevator shaft. The additional space could be rented out for special uses and events. This alternative would also provide a significant enhancement of the programs and facilities at the site, as in alternative 2, and would provide enhanced interpretive opportunities.

For the preservation of the structure and the collection, a central air-conditioning system for the structure and a museum-standard climate control system for the collection storage area would be installed. Special care would be taken to insert the systems within the existing structure in concealed spaces behind paneling, soffits, and if necessary, on the outside in the rear of the building. The air-handling equipment in the basement and/or on the roof would be installed in such a way that would not intrude on the designed appearance of the site.

The historic elevator would remain for staff use and interpretation. The visitor services area on the basement floor with the sales/information desk and restrooms would remain unchanged. The staff area at the rear of the basement would be removed to provide room for the elevator. The staff space would be relocated on the third floor to a more spacious and efficient area. The former staff area in the servant's quarters would be converted into interpretive space that would allow for an audiovisual area for visitors.

Additional exhibits and publications, with multilingual information, would be used to bring Theodore Roosevelt's life into the context of contemporary life.

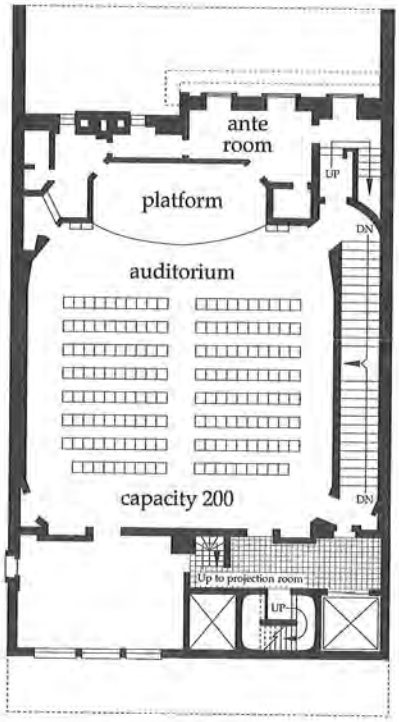
The period rooms on the first and second and floors would be preserved; however, the addition of the elevator would require access through these rooms. This would destroy historic fabric and layout of the dining room, children's porch, and nursery. The addition to the rear of the structure would remove the skylights in the kitchen area and above the Rough Rider room.

The second-floor library would be restored in part to its 1923 appearance, using original furnishings now stored in the basement and third floor. A resource and educational center of site-related archival materials would be developed in the library. This would be open to researchers and visitors alike on a scheduled or appointment basis.

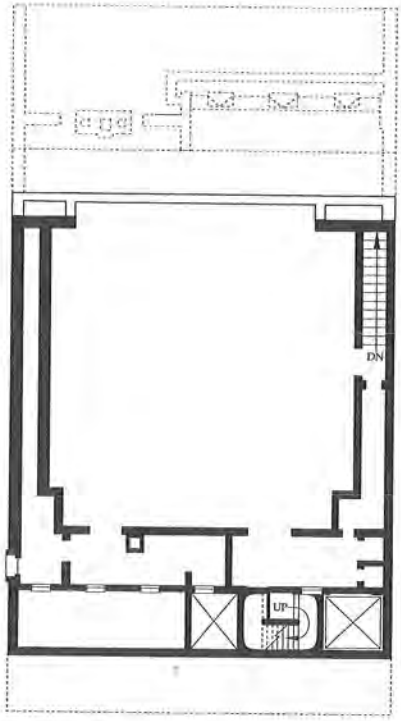
Part of the third floor would be used for NPS administrative offices and staff space, as well as space for the cooperator. The western half of the second and third floors would continue to be used for curatorial storage and conservation. The storage closets and vaults in this area would be conserved and used as appropriate for museum object storage. Modern museum storage equipment would be installed.

The site would be maintained as a historic zone. Eight full-time employees would be required for this alternative, and annual operational costs would be about $500,000. Implementation and interpretation costs would be about $3,409,000, the most costly of the three alternatives (see appendix C).

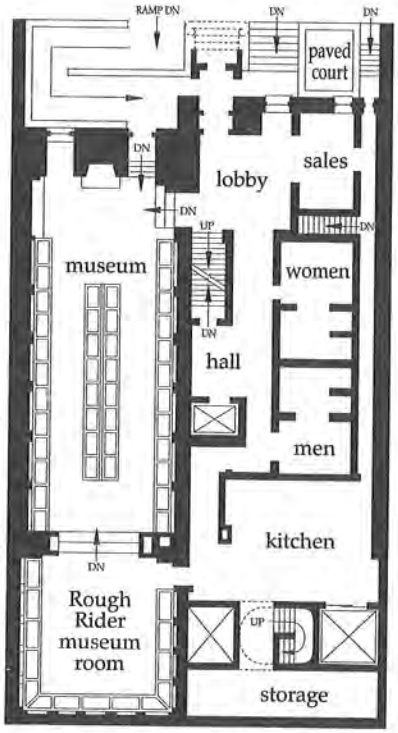
Third Floor



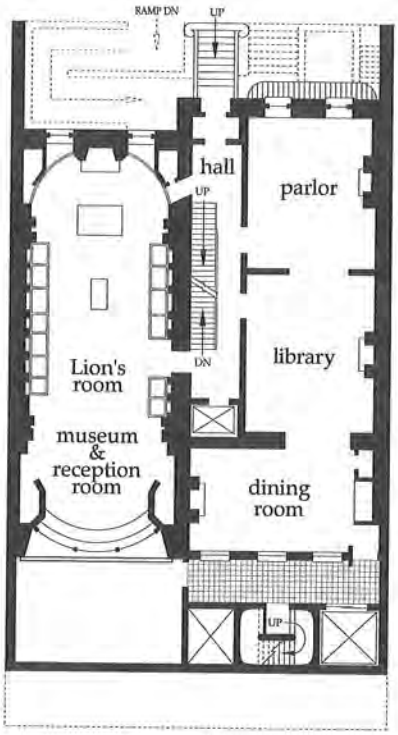
Fourth Floor



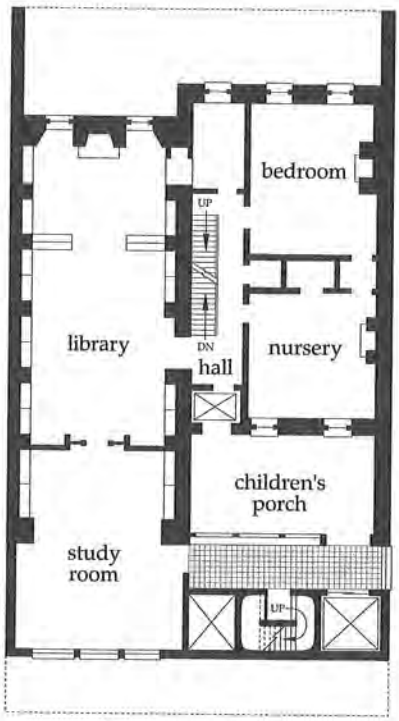
Roof Terrace & Garden



Basement Level



First Floor



Second Floor

ALTERNATIVE 3
FULL ACCESSIBILITY

Theodore Roosevelt Birthplace

National Historic Site

United States Department of the Interior • National Park Service

DSC / Dec. 1995 / 420 / 20,020

No Scale

TABLE 13. SUMMARY OF ALTERNATIVES FOR THEODORE ROOSEVELT BIRTHPLACE

	ACTIONS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2 — PROPOSED ACTION	ALTERNATIVE 3
Structure		Little change.	Some structural changes because of air-conditioning systems.	Significant changes for elevator and air-conditioning systems.
Interpretation and Programs	Visitor comfort and experience would be enhanced through some form of climate control. Site would be open seven days/week, and more outreach programs and community/friends groups would be established. Updated brochures and new information board (with history, map, and tour/events schedule) would be accessible to non-English-speaking visitors and those with visual limitations. Outside wayside, accessible to all visitors, would provide brief history. Entertainment programs and special events in the auditorium would continue to be scheduled by park staff and cooperators.	Existing interpretation and tours of period rooms, which would be preserved, would continue to be primary interpretive activity. Additional window air-conditioners would be installed in rear windows.	Significant enhancement of programs, interpretation, and facilities at the site. Information/sales desk area and restrooms would be rehabilitated. Central air-conditioning system, with museum-standard climate control system for collection storage area, would be installed, increasing visitor and staff comfort. Period rooms on first and second floors would be preserved. Additional exhibits and publications would bring Roosevelt's life into contemporary context. Library (second floor) would be restored in part to 1923 appearance, using original furnishings. Resource and educational center of site-related archival materials would be developed in library. Research facility would be open to researchers and visitors.	Significant enhancement of programs and facilities at the site. Central air-conditioning system, with museum-standard climate control system for collection storage area, would be installed. Additional exhibits and publications would bring Roosevelt's life into contemporary context. Library (third floor) would be restored in part to 1923 appearance, using original furnishings. Resource and educational center of site-related archival materials would be developed in library. Research facility would be open to researchers and visitors.
Collection	Continue use of monitoring system for the collection. Update collections management plan. Collections on exhibit would be rotated.	Undisplayed collection would continue to be stored and curated in the western halves of the second and third floors. Portable humidification equipment would be used to help preserve undisplayed collection.	Central air-conditioning system would be installed in house, and museum-standard air-conditioning system and storage equipment would be installed in collection storage areas. Undisplayed collection would continue to be stored and curated in the western halves of the second and third floors.	Same as alternative 2.

	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action	Alternative 3
Accessibility	Unaided accessibility into structure provided via a ramp installed at basement (main) entry level. Ramp system would be added to lower museum and Rough Rider room. Some exhibits would remain too high for viewing by all visitors. Upgrade of exhibits and audiovisual media would be done for visitors with hearing and sight disabilities and non-English-speaking visitors.	Existing elevator would allow access to basement and three floors; fourth floor would continue to be inaccessible to visitors and staff with disabilities.	Structure would be fully accessible (except for a few exhibits). Existing elevator would allow access to basement and three floors; closet elevator would be installed for access from third to fourth floor.	Structure would be completely accessible via elevator system installed at rear of building.
Cooperators	Theodore Roosevelt Association would continue to use site and auditorium for special programs and events. Association would continue to be involved in preservation and conservation of the structure and its museum collection. American Landmark Festivals would continue its concerts through an informal agreement.			
NPS Operations	Part of third floor would be used for NPS administrative offices and cooperator space and part for curatorial storage and conservation. Site supervisor would continue to be involved in community relations.		More staff would be need for interpretation.	More staff would be needed for maintenance and interpretation.
Research	Ethnographic assessment and overview would be done to provide information.			

	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action	Alternative 3
Outreach	National Park Service would continue to work closely with cooperators and local community organizations for use of auditorium and would expand efforts to promote site among local schools and tourist organizations.			Additional space created by elevator installation and expansion could be rented out for special events.
Staffing		4 full-time employees	5 full-time employees	8 full-time employees
Annual Operating Costs		$185,000	$225,000	$500,000
Implementation Costs (including interpretation)		$264,000	$1,241,000	$3,409,000

TABLE 14. SUMMARY OF IMPACTS FOR THEODORE ROOSEVELT BIRTHPLACE

TOPIC	ACTIONS COMMON TO ALL ALTERNATIVES	ALTERNATIVE 1 — NO ACTION	ALTERNATIVE 2 — PROPOSED ACTION	ALTERNATIVE 3
Impacts on Cultural Resources				
Impacts on Historic Structures	Minimal impacts on historic fabric due to wheelchair ramp to provide access; would be mitigated by careful design and installation. However, grassy area in front would be removed.	Same as alternative 1.	Installing central air system would negatively impact some interior historic fabric; careful design would avoid major impacts. Installing closet elevator from the third to the fourth floor would destroy some interior historic fabric. A compatible design and careful installation would deter some of the damage.	Interior and rear facade of structure would be significantly impacted. Elevator installation and changes on building's rear exterior would remove significant amounts historic fabric and alter historic design, especially in period rooms. Careful design and construction would help minimize impacts.
Impacts on Museum Collections	Collections management plan would be updated, which would benefit collection. Rotation of collection on exhibit would alleviate some impacts.	Adverse impacts of the climate on the collections would be reduced. Collections in lower museum and Lion's room would not continue to be exposed to the elements. Although more air-conditioners would be of some help, proper atmospheric conditions for collections would not be achieved.	Extensive conservation and careful exhibition of artifacts would be positive impact on collection. Climate control systems and storage equipment would help preserve artifacts and collection, a positive impact on collection and site. Adverse impacts of climate on collections would be alleviated.	Same as alternative 2.
Impacts on Ethnographic Resources	Unknown; determined by future ethnographic study.			
Impacts on Visual Resources	Exterior ramp, although visually intrusive, would be unobtrusive by design but would destroy grassy area in front, which would change the visual scene somewhat. Effect would be lessened by sensitive design of the ramp.	No impacts on surrounding structures. Installing more window air-conditioners would be visual intrusions, but would be mitigated by putting air-conditioners in rear of building.	No impacts.	Would visually impact exterior of structure, especially rear facade, and neighboring buildings around the rear alley.
Impacts on Archeological Resources	Minimal likelihood of impacting archeological resources when installing front ramp.			
Impacts on Natural Resources	No perceived short- or long-term impacts.			
Impacts on Floodplains	No impacts.			

Topic	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action	Alternative 3
Impacts on Threatened or Endangered Species	No impacts.			
Impacts on Coastal Zone Management	With required state concurrence, no impacts.			
Impacts on Regional Land Uses and Visitor Facilities	No impacts.			
Impacts on Socioeconomic Environment	No new impacts except that increased outreach for schools would provide positive learning experiences. No significant impacts on homeless.			
Impacts on Visitor Use and Interpretation	Some exhibits would remain too high for viewing by all visitors. Visitor comfort would be improved. Quality of visitor experience would be enhanced by addition of ramp system into building and lower museum and Rough Rider room. Site tours would continue to offer complete history of site. Structure could be accessed by visitors with disabilities (except fourth floor). Multilingual information would also be of benefit to many visitors.	Same as alternative 1. Added air-conditioners would allow full summer use and provide more comfort for visitors.	Quality of visitor experience significantly improved. Site would be fully accessible, and air-conditioning system would improve comfort and allow summer use. With improved and expanded programs, more visitors might come to the site. Renovated lobby would provide a more welcoming and organized entrance, which would be a positive impact. The expanded and comprehensive interpretation of the site would allow a better understanding of the site's themes, which would be a positive impact for visiting school groups.	Quality of the visitor's experience would be significantly improved. Site would be fully accessible to those in wheelchairs, and comfort provided by central air system would allow use on hot days. With improved and expanded programs more visitors might come to the site. The expanded and comprehensive interpretation of the site would allow a better understanding of the site's themes, which would be a positive impact for visiting school groups.
Impacts on Transportation	No new impacts.			
Impacts on Cooperators	No new impacts.			

Topic	Actions Common to All Alternatives	Alternative 1 — No Action	Alternative 2 — Proposed Action	Alternative 3
Impacts on NPS Operations	Site would be open for seven days/week, which would impact management and operations. The site supervisor would continue to be involved in community relations, which might benefit the site and its security.	Air-conditioners would provide comfort for staff. Site management and operations would be impacted, especially without additional staff.	Staff would be relieved of issues related to visitors with disabilities because site would be fully accessible (except for a few exhibit cases). Extended hours would require more interpretive and custodial staff. Additional staff would be a positive impact on site management. Central air-conditioning systems would improve staff comfort and site management.	Same as alternative 2.
Cumulative Impacts		No new impacts.	Same as alternative 1.	Same as alternative 1.
Unavoidable Adverse Impacts / Relationship between Short-term Uses and Long-term Productivity / and Irreversible and Irretrievable Commitment of Resources	Addition of entrance ramp would be a minor irretrievable and irreversible impact on historic fabric.	No additional impacts.	Addition of central air-conditioning system and closet elevator from third to fourth floor would cause irreversible and irretrievable commitment of interior historic fabric; careful design and installation would help mitigate impacts.	Proposed actions would irreversibly and irretrievably commit historic fabric and design elements for both interior and rear facade of the structure and provide more space for special use/events Permanent visual impacts on exterior of structure would occur, especially on the rear facade.

CULTURAL RESOURCES

History of Theodore Roosevelt Jr.

Theodore Roosevelt was born on October 27, 1858, to Theodore Roosevelt Sr. and Martha Bulloch. Born in Manhattan, New York, as one of four children, Theodore was the seventh generation of Roosevelts in Manhattan, the earliest settling from the Netherlands in 1644. Theodore was a frail and asthmatic child who struggled with physical limitations. He overcame his ailments by exercising and bodybuilding.

Over time, Theodore became physically robust, mastering various skills of shooting, boxing, and horseback riding. His love of the outdoors led him to national and international travels, and he became a rancher and an exotic animal huntsman. Roosevelt's early education cultivated his interest in history and naturalist topics, which he continued to explore and foster throughout his life. He excelled at Harvard, graduating Phi Beta Kappa, but was not enthusiastic with the opportunities it had to offer. Enrolled in Columbia University Law School but with little desire in pursuing a law career, Roosevelt turned to his interest in history and writing books and magazine articles.

In 1882, at the age of 24, Roosevelt launched his political career when he was elected to the 21st State Assembly in Albany, New York. Serving in his first political position, Roosevelt learned about politics and the way of the press. He supported and campaigned for laws that improved the conditions of both the workforce.

Roosevelt worked at his political career; however, he remained a keen naturalist and avid outdoorsman as well. In 1883 he established the Maltese Cross Ranch in North Dakota. The ranch offered Roosevelt the opportunities for raising cattle, hunting, and the rugged outdoor activities that he relished. It also provided him a place of solace after his young wife of four years, Alice Hathaway Lee, died shortly after giving birth to his first child in 1884.

After his assembly term in Albany, Roosevelt immersed himself in writing a number of books on ranching and politics; he also continued to participate in politics peripherally. After an unsuccessful run for the mayor of New York in 1886, he traveled and married his second wife, Edith Kermit Carow.

He returned to politics to assist in the presidential election, and in 1888 he was appointed as a civil service commissioner in Washington, D.C. In 1897 he was appointed as the assistant secretary of the navy by President William McKinley. Roosevelt favored an aggressive approach to foreign relations. He resigned as assistant secretary of the navy to pursue active military duty in the Spanish American War. With White House physician Captain Leonard Wood of the Army Medical Corps, he formed the First U.S. Cavalry Volunteers, which came to be known as the Rough Riders. Although Roosevelt had no formal training in battle techniques, his career as the president of the police commissioners of New York in 1895–97 provided leadership experience. As the colonel of the Rough Riders, Roosevelt emerged from the pages of the press as a hero of the Spanish-American War, who led the now-famous charge up San Juan Hill in the 1898 Battle of Santiago.

Roosevelt's successful military engagements during the Spanish-American War benefitted his 1898 bid for the governorship of New York. Winning the election, he pursued his reform goals of state government; his administration caused alarm among many of his political associates. In 1900 Roosevelt was nominated for and won the election as the vice-presidential running mate to William McKinley. In 1901, in Buffalo, New York,

Roosevelt took the oath of office and became the 26th president of the United States, after McKinley's assassination.

Roosevelt's presidential career was most notable on the domestic front — for his dedicated sponsorship of the conservation of natural resources his antitrust legislation. His office was aggressive in foreign relations and policies. He secured the right to construct the Panama Canal and, in 1906, was given the Nobel peace prize for his intervention in the Russo-Japanese War. After serving two terms, Roosevelt left the presidential office, traveled overseas, and resurrected his writing career. In 1912 he reentered politics as a third party presidential candidate under the Progressive "Bull Moose" ticket. Surviving an assassination attempt while campaigning in Wisconsin, Roosevelt faced a difficult political battle against President William Taft. Their struggle enabled, in part, the election of Democrat Woodrow Wilson as president of the United States.

Roosevelt never strayed far from the political arena. Although he lost the 1912 campaign, he continued to offer his suggestions and opinions to those in office. He continued his travels, and in while in Brazil he contracted several physical maladies, rendering him blind in one eye and weakening his overall physical health. However, this did not diminish his fervent opinions and views. The start of World War I brought Wilson and the pro-war Roosevelt into further conflict. Although he lost one of his sons in the war, Roosevelt remained proactive and petitioned the War Department and the White House for permission to assemble a volunteer division and to command one of is brigades. The White House declined his petition, citing his age and physical condition. He returned to his writing and wrote his last book *The Great Adventure; Present-day Studies in American Nationalism.*

Theodore Roosevelt Jr. died on January 6, 1919, in Oyster Bay, New York. His illustrious careers and adventurous life included politics as well as science and history. He maintained a sense of commitment and dedication to his beliefs and epitomized the new nationalism of the United States as it entered the international stage as a world power in the first years of the 20th century.

Brief History of the Site and Structure

In the late 1840s, Cornelius Roosevelt presented wedding gifts to his sons, Theodore Roosevelt Sr. and Robert Roosevelt: two newly built adjoining townhouses on East 20th Street in Manhattan. Theodore Roosevelt Jr. (1858–1919) spent his first 14 years in the eastern residence. The Theodore Roosevelt family moved out of the house in 1872; for 40 years it was occupied by various residential and commercial tenants, altered considerably during this time.

Soon after Roosevelt Jr. died in 1919, the Women's Roosevelt Memorial Committee (soon to be called the Women's Roosevelt Memorial Association) was formed with the intention of restoring the birthplace home. In addition to providing a memorial to their deceased president, the women intended the restored home to be a place where schoolchildren could come to broaden their understanding of their country and Rooseveltian Americanism. Within two months of his death, the association had purchased the property (and the adjoining property), which by then had been drastically altered since Roosevelt's boyhood years.

The association selected architect Theodate Pope Riddle, one of the country's first female architects, to design a building containing both a reconstruction of the birthplace and a museum. Funds for construction were lacking, however, and in 1922 the association partially merged with the Roosevelt Memorial Association who had funds but no success in securing a memorial site. The reconstructed home, combined with a museum exhibiting Roosevelt memorabilia, a library, and an auditorium, would allow both organizations to realize their plans.

The re-creation of the facade of the birthplace and the period rooms within it were based, in part, on the memories of Theodore Roosevelt's two sisters, Anna Cowles and Corinne Roosevelt Robinson, and his second wife, Edith Kermit Carow Roosevelt, who had been familiar with the original house. The women were instrumental in determining spatial configuration, wall and floor finishes, furnishings, and furniture placement in the rooms. The re-creation was also based on house descriptions from Roosevelt's autobiography.

The site opened to the public on October 27, 1923. The focus of the building was the five re-created period rooms: parlor, library, dining room, nursery, and master bedroom. Museum galleries were filled with Roosevelt memorabilia and exhibits pertaining to Roosevelt's adult life, career, and politics. A library was filled with a collection of Roosevelt books and other research material. The auditorium was used for association meetings and meetings of other patriotic organizations and social affairs.

Theodore Roosevelt Birthplace was established as a national historic site on July 25, 1962 (76 stat. 217), and listed on the National Register of Historic Places on October 15, 1966, with historical documentation following on December 6, 1976. In 1963 the Theodore Roosevelt Association donated the site to the National Park Service.

Architectural Description and Development

The building, comprised of both the east and west properties, is constructed of reinforced concrete. The facade is faced with Portland (Connecticut) brownstone in ashlar blocks; the rear wall is faced with brick. Side walls adjoin the party walls of the two adjacent buildings.

The building is four stories high with a raised basement. Visitors to the site enter through a door in the basement, accessed by two short sets of steps leading down from street level. The eastern facade was designed as an 1840s townhouse with a prominent front entry, shutters on the windows, mansard roof, and bronze railings and balcony. The facade is arranged in three bays; the front entry, in the western bay, is accessed by 11 steps. A small, nonfunctioning balcony is in front of the eastern and center bay windows adjacent to the door. Above the third story is a simple cornice, and above the cornice is a mansard roof, covered with slate and pierced by three pedimented dormers. A bronze eagle over the door provides a mount for a flag.

The western half of the building is set back 4 feet, and the facade was designed without ornamentation to avoid competition with its neighbor. The facade is also three bays wide with the center bay consisting of a slightly protruding chimney stack, faced with brownstone. Three chimney pots surmount the stack. Windows, without shutters, are in the east and west bays; the fourth-story windows consist of narrow vertical slits. The back wall of the building is marked by an irregular placement of windows and a fire escape.

The interiors of the two buildings are joined on each floor with doors through the party wall. A subbasement houses some storage facilities and the mechanical systems. The basement story (or the ground floor), is arranged with a lobby, information area, restrooms, kitchen, and caretaker's quarters on the east and museum galleries on the west. The back gallery and the Rough Rider room is covered with skylights.

The first and second stories of the east half of the building were designed to reflect the atmosphere of the original birthplace from the years 1865 to 1872. A hall and staircase are in the west bay and the period rooms (parlor, library, dining room, nursery, and master bedroom) in the center and east bays. A museum gallery and library are in the first and second stories, respectively, of the west half of the building. The entire third story is

used for museum storage and offices, and the fourth floor houses the auditorium.

Interior finishes of the period rooms consist of wallpaper, painted woodwork, marble fireplaces, marble floors in the hall, carpeted floors in the rooms, and a variety of light fixtures. Interior finishes of the rest of the building consist of oak paneling; marble fireplaces; terrazzo, parquet, cork, and linoleum floors; carpeted floors; brass handrails; a variety of light fixtures; and museum display cases of oak and glass.

A variety of conveniences (state-of-the-art technology in the 1920s) were installed in the building: an elevator, a fire alarm system, a centralized vacuum-cleaning system, speaking tubes permitting communication between the kitchen and the auditorium, and a dumbwaiter. The projection booth in the auditorium was outfitted with metal doors, installed to prevent the spread of fire from film combustion.

Several changes have occurred since NPS acquisition in 1963. To better accommodate office and administrative functions, modifications were made to the heating and electrical systems, including the installation of new lighting fixtures. In the late 1970s, the period rooms and exhibit rooms were refurbished.

Museum Collections

The collection of the birthplace contains more than 5,000 objects and 60,000 archives. The collections include furnishings, decorative arts on display in the period rooms (about 40% are from the original house, 20% are from the family collection, and the remainder are period pieces), and memorabilia and documents commemorating Roosevelt's life and accomplishments. There is also a large book collection.

New York City Landmark Designated District

Theodore Roosevelt Birthplace is a designated New York City individual historic landmark. It also lies within the New York City "Ladies Mile Historic District," which commemorates the fashionable stores frequented by women in the boom years following the Civil War and well into the 20th century. This district, although a city landmark, is not currently on the National Register of Historic Places.

Ethnographic Resources

Ethnographic data related to Theodore Roosevelt Birthplace has not been compiled. To expand information about the site's ethnographic resources and contemporary groups that are traditionally associated with the birthplace, a future study would be conducted (see "Actions Common to All Alternatives" section).

NATURAL RESOURCES

The natural resource description for the Manhattan Sites previously discussed is applicable to the Theodore Roosevelt Birthplace.

Floodplains

Theodore Roosevelt Birthplace is outside the 100- and 500-year predicted flood as determined by the Federal Emergency Management Agency. Base elevations range from 180 to 190 feet above mean sea level.

Threatened and Endangered Species

Consultation with the U.S. Fish and Wildlife Service field office in New York and the Significant Habitat Unit of New York Department of Environmental Conservation revealed that, except for occasional transient

individuals, no federal or state listed or proposed endangered or threatened plant or wildlife species are in the vicinity of Theodore Roosevelt Birthplace (see appendix D).

SOCIOECONOMIC ENVIRONMENT

General Characteristics

Theodore Roosevelt Birthplace National Historic Site is in the area on the east side of Manhattan known as Gramercy Park. This small, once exclusive enclave is near the southeastern corner of Community District 5, which encompasses most of central Manhattan and includes many well-known cultural and commercial landmarks, such as the Empire State Building, Grand Central Terminal, the New York garment district, the Broadway theater district, and Times Square. Nearby, largely residential neighborhoods include Murray Hill, Stuyvesant Park, and parts of Midtown South.

Socioeconomic profiles, developed by the city's Department of City Planning, and adopted in this plan, use community districts as the basic unit of analysis. Because Gramercy Park comprises a very small area at the border of Manhattan Community Districts 5 and 6, socioeconomic patterns and trends with direct bearing on the site may be closer to those found in nearby areas of District 6 than in neighborhoods further north and west in Community District 5.

Population density is relatively low due to the district's largely commercial character. Although the residential population increased by 10% in the 1980s, the percentage of foreign-born residents increased by 18.3% to 21.6% of the total. Nearly 40% of this subgroup are recent immigrants. The predominant ethnic groups are of European descent, especially Irish, German, and Russian-Ukrainian. The last decade has seen a significant increase in the percentage of new residents from Slovakia (103.3%) and Sweden (102.4%). Most other reported groups, including those of African, Hispanic, or Asian ancestry each comprise less than 3% of the population. In 1990, 25.5% of residents spoke a language other than English in the home, representing a 21.8% increase over the 10-year period. Although the district has the largest transient population in New York City, residents generally exhibit very high levels of educational attainment and fall into the middle and upper income levels, with a correspondingly low overall level of poverty.

The district supports a relatively low residential population (about 43,500) but has the highest transient population in the city. The median household and per capita incomes of $42,050 and $39,058, respectively, are similar to those in district 1. More than 40% of the tax lots (from the city's real property file) are commercial or industrial in nature; the remaining are primarily residential. Average rent for residential properties is $817 per month; 34% of those renting pay $1,000 or more per month.

Local Issues

The district reports a number of concerns regarding homeless youth and families, and various problems relating to infrastructure, transportation, police security, and lack of recreational parks. Currently the district's number one capital budget priority is to provide permanent housing and adequate interim housing for homeless persons.

Transportation, security, and sanitation concerns are relevant to Theodore Roosevelt Birthplace. Traffic problems are universal throughout New York City; midtown Manhattan, for example, is without a computerized traffic system that allows traffic to be diverted or flows increased where necessary. Residents and visitors may be stuck in numerous traffic jams while trying to reach their destinations, including Theodore Roosevelt Birthplace. The community board feels that because this district represents New York City to much of

the world, this district should be safe and clean for its residents and visitors.

REGIONAL LAND USE AND VISITOR FACILITIES

The area surrounding Theodore Roosevelt Birthplace is zoned as mixed use, a designation that allows commercial, industrial, and residential activities. Commercial buildings in this area are undergoing transformations and being converted into residential living spaces. Portions of Broadway near Theodore Roosevelt Birthplace have been designated as the Ladies Mile Historic District to commemorate the fashionable stores frequented by women in the boom years following the Civil War and well into the 20th century.

CARRYING CAPACITY

The carrying capacity at the birthplace is 100 people, which is based on safety regulations and preservation of the resources.

NPS OPERATIONS

The current operating costs are about $185,000, and there are four full-time employees.

TRANSPORTATION

Theodore Roosevelt Birthplace is accessible the subway trains nos. 4, 5, and 6, or the N and R trains. The city bus system has extensive service to the area with the M1, M2, M3, M5, M6, M7, and M18 buses. Curbside parking in the area is difficult to find and very limited.

COOPERATORS

Theodore Roosevelt Association

The Theodore Roosevelt Association was established to assist in the administration and development of both Sagamore Hill and Theodore Roosevelt Birthplace National Historic Sites. Representatives of the National Park Service and the association meet regularly to consult on respective goals, plans, and activities for the sites. A $500,000 endowment fund was provided for in the site's establishing legislation, the interest from which is used for projects that are mutually agreed upon by the National Park Service and the association. The association funds structural projects to preserve and maintain the birthplace.

At Theodore Roosevelt Birthplace, the association uses the site for special programs and cultural events. Some of these programs are an institution to the site, as well as important annual events for the city. The high profile annual Police Awards Ceremony recognizes individuals of the police force that have displayed heroism and persistence to remain in the line of duty despite difficult personal or physical obstacles. Other events, such as the Theodore Roosevelt Association oratory contest, is held for state high schools.

American Landmark Festivals

The American Landmark Festivals is a cultural organization that has coordinated a regularly scheduled concert series at Theodore Roosevelt Birthplace for many years. Although the cooperative agreement between the American Landmarks Festivals and the National Park Service for these concerts was not renewed by either party in 1995, concerts will continue on Saturday afternoons at Theodore Roosevelt Birthplace under an informal agreement. The possibilities of reestablishing the cooperative agreement are unknown.

VISITOR USE AND INTERPRETATION

Visitation at Theodore Roosevelt Birthplace often ranges from a low of five visitors per day during inclement weather to over 300 per day during a major special event at the site. Visitation has peaked at about 2,000 visitors a month, with an average of 70 per day. Peak months are usually during the spring and fall, but special events may affect this norm. Peak periods are attributable to school groups, the Theodore Roosevelt lecture series, American Landmarks Festival concerts, and similar events. Winter lows in visitation are normally due to weather conditions and an ebb of tourist arrivals in the city. Summer lows are due to environmental factors in the house, primarily a lack of air-conditioning, which forces closure of the site's auditorium and concerts, lectures, and other uses that require a large space.

TABLE 15. THEODORE ROOSEVELT BIRTHPLACE, VISITATION

Year	Visits/Year
1980	16,525
1981	14,014
1982	13,462
1983	13,976
1984	17,449
1985	19,874
1986	18,634
1987	18,872
1988	17,126
1989	12,712
1990	12,384
1991	13,901
1992	19,782
1993	19,957
1994	23,074

NOTE: Visitation is measured by counting the number of paid fees. For special events, the number of people that fill one area is multiplied by the number of areas that are the same size and also filled with people.

IMPACTS COMMON TO ALL ALTERNATIVES

Impacts on Cultural Resources

Impacts on Historic Structures. The construction of the wheelchair ramp in front of the house would have minimal impacts on the historic fabric of the structure's exterior. Careful design and installation of ramp would help mitigate impacts. The interior floor plan or fabric would not be impacted by the ramp. However, the grassy area in front of the building (about 12 feet by 10 feet) would be removed to allow for the ramp.

Impacts on Museum Collections. Under all of the alternatives, the collections management plan would be updated and specify the standards for collections storage and exhibit, which would benefit collection. Rotation of exhibits in cases would have a positive impact on collection preservation.

Impacts on Ethnographic Resources. The ethnographic study would determine if any ethnographic resources exist and would be impacted by actions under these alternatives. The study would also

- provide a foundation for evaluating how future actions would include or affect ethnographic resources
- allow the National Park Service to become more active with the neighborhood by sharing management information on site's resources on an continuing basis
- provide an information base for and understanding of the existing traditional uses of the structure and within the area of Theodore Roosevelt Birthplace
- take into account the contemporary concerns of neighboring groups about park operations and provide for channels of communication and cooperation with the various groups identified
- identify gaps in available data and provide an annotated bibliography, which could be used in future park operations and management

Impacts on Visual Resources. Exterior ramp, although visually intrusive, would be unobtrusive to building's historic style by design but would destroy grassy area in front, which would change the visual scene somewhat. However, this effect would be lessened by sensitive design of the ramp.

Impacts on Archeological Resources. Under all alternatives, the installation of the accessibility ramp at the front elevation would require ground-disturbing activities. However, because this action would occur on previously disturbed land, the potential of impacting any archeological resources is highly unlikely.

Impacts on Natural Resources

There would be no perceived short- or long-term impacts on the natural resources associated with the actions proposed in any of the alternatives.

Impacts on Floodplains. Theodore Roosevelt Birthplace is outside of both the 100- and 500-year floodplain as determined by the Federal Emergency Management Agency. Therefore, there would be no associated impacts on floodplain values at this site.

Impacts on Threatened or Endangered Species. Except for occasional transient individuals, no federally listed or proposed endangered or threatened species under the jurisdiction of the U.S. Fish and Wildlife Service or other state and city regulatory agencies are known to exist in the project area. Therefore, there would be no impacts and no biological assessment or further section 7 consultation under the Endangered Species Act (87 Stat. 884, as amended; 16

U.S.C. 1531 et seq.) would be required with the these agencies.

Impacts on Coastal Zone Management. With required concurrence with New York's coastal zone management program, there would be no impacts on coastal zone management.

Impacts on Regional Land Uses and Visitor Facilities

The three alternatives would not have effects on adjacent land uses and facilities because all proposed actions would occur within the confines of the house.

Impacts on Socioeconomic Environment

The three alternatives provide for continued educational, cultural, and concert opportunities for city residents and birthplace visitors, in conjunction with cooperators, thereby continuing positive intellectual and entertainment benefits for those attending events. Additional outreach to schools would provide positive learning experiences for area students. Continued NPS cooperation with local community groups, school groups, and Theodore Roosevelt Association would promote good relations with the community as well as continue to provide educational and entertainment opportunities for local residents and space for community meetings.

There would be no significant impacts on the homeless people who sometimes use the site.

Impacts on Visitor Use and Interpretation

Some exhibits would remain too high for viewing by all visitors. Basement and first three floors would be accessible. Visitor comfort would be improved by the addition of some form of climate control. Site tours would continue, offering a positive effect on the visitor understanding the site's history. The addition of a ramp system into the building and the lower museum and Rough Rider room would also improve visitor experiences. Site tours would continue, offering visitors a history of the site. Multilingual information would also be of benefit to many visitors.

Impacts on Transportation

The three alternatives would not impact traffic or parking adjacent to the site. In all alternatives, street parking would remain generally unavailable. Visitors and residents would use public transportation, such as buses or the subway, taxis, and walking as their primary means of transportation to the birthplace.

Impacts on Cooperators

With the Theodore Roosevelt Association continuing to use the site for special programs and special events and the American Landmarks Festival continuing to hold concerts at the birthplace in the fourth floor auditorium (through an informal agreement), there would be no new impacts on the cooperators.

Impacts on NPS Operations

Under all alternatives, the site would be open for seven days a week. This would impact park operations and management. The site supervisor would continue to be involved in community relations, which might benefit the site and its security.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

The addition of the entry ramp to make the building accessible would have minimal but

irreversible and irretrievable impacts on the historic fabric.

ALTERNATIVE 1

Impacts on Cultural Resources

Impacts on Historic Structures. This alternative would not have any additional impacts on the historic structure or its fabric.

Impacts on Museum Collections. With the periodic rotation of artifacts on exhibit, the museum collections (which consist primarily of paper, photographs, and textiles on exhibit in the lower museum and the Lion's Room would not continue to be exposed to the elements. Although more window air-conditioning units would reduced concerns related to extreme temperature fluctuations, a proper atmospheric control system for correct storage conditions would not be provided.

Impacts on Visual Resources. There would be no visual impacts on the surrounding structures in the neighborhood. Installing more window air-conditioners would be visual intrusions, but this would be mitigated by installing the air-conditioners in the windows of the building's rear facade.

Impacts on Natural Resources

There would be no impacts on natural resources.

Impacts on Visitor Use and Interpretation

The quality of visitors' experiences would be enhanced by installing more air-conditioners. Visitors with disabilities could access all but the fourth floor.

Impacts on NPS Operations

Window air-conditioners would provide more comfort for staff. There would be a negative impact on site management and operations because additional staff would not be hired.

Cumulative Impacts

The special events of the associations would continue to be a positive impact on the site and surrounding community because they provide an awareness of the site, its history, and the events that occur here. The annual Police Awards Ceremony and the concerts provided by the American Landmarks Festival do not occur elsewhere in the area. This continues a positive use of the site during evening hours and draws visitors into the area. There would be no new cumulative impacts.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

There would be no additional short-term, unavoidable, or irreversible impacts.

ALTERNATIVE 2 — PROPOSED ACTION

Impacts on Cultural Resources

Impacts on Historic Structures. This alternative would have an adverse impact on the historic structure and its fabric. The addition of the central air and museum-standard air systems would have negative impacts on some of the historic fabric of the interior. However, with careful planning and installation of the system, major impacts on the fabric could be avoided.

Although the installation of the closet elevator from the third to the fourth floor

would destroy some interior historic fabric, visitors and employees with disabilities would have access to the auditorium. A compatible design and careful installation would deter some of the damage.

Impacts on Museum Collections. Central air-conditioning and careful exhibition of artifacts, a museum-standard climate control system, and storage equipment in the library would preserve the collection, its storage space, and exhibits. The adverse impacts of the climate on the collection would be alleviated.

Impacts on Visual Resources. There would be no additional impacts on visual resources.

Impacts on Natural Resources

There would be no impacts on natural resources.

Impacts on Visitor Use and Interpretation

The quality of the visitor's experience would be significantly improved. The site would be fully accessible (except for a few exhibit cases), and the interior comfort provided by the air-conditioning system would allow for full-term summer use. Improved and expanded range of programs could attract more visitors if a diligent effort is made to market the site. The renovation of the lobby area would provide a more welcoming and organized entrance into the site, which would positively impact visitor orientation. The expanded and comprehensive interpretation of the site would allow a better understanding of the site's themes, which would be a positive impact for visiting school groups.

Impacts on NPS Operations

Because this alternative would allow full physical accessibility (except for a few museum cases), staff would be relieved of issues related to visitors with disabilities. The extended hours would require more staff for interpretation and custodial responsibilities. Central air-conditioning would improve staff comfort and site management. The hiring of additional staff would be a positive impact on site management.

Cumulative Impacts

There would be no new cumulative impacts from implementing this alternative. The continuing special events and concerts and the Police Awards Ceremony would continue to be a positive impact on the site and surrounding community by providing an awareness of the site, its history, and the events that occurred here and by continuing a positive use of the site during evening hours and drawing visitors into the area.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

The addition of a central air-conditioning system, a museum-standard climate control system for the museum collection in the library, and a closet elevator from the third to the fourth floor could cause an irreversible and irretrievable commitment of the historic fabric of the interior of the structure. Mitigation is proposed by developing a compatible design and careful installation of the climate control systems and meeting regulations regarding the collections.

ALTERNATIVE 3

Impacts on Cultural Resources

Impacts on Historic Structures. The actions under this alternative would significantly impact the interior and rear facade of the structure. The proposed installation of the

elevator would remove historic architectural fabric and alter the historic design of the structure, as would the removal of the skylights and fire stair.

In the interior, the site keeper's rooms, the dumbwaiter shafts, the kitchen area on the fourth floor level, and the window openings in the dining room, nursery, and in the third floor staff area would be removed to allow for the elevator openings. Although these actions would have a significantly negative impact on the building's historic fabric, the design and construction would be handled carefully to minimize the loss of fabric.

Impacts on Museum Collections. Central air-conditioning, careful exhibition of artifacts, a museum-standard climate-control system in the collection storage area, and storage equipment in the library would help preserve the collection, its storage space, and exhibits. The adverse impacts of the climate on the collection would be alleviated.

Impacts on Visual Resources. The actions of this alternative would have a visual impact on the exterior of the structure, especially on the rear facade. The elevator would take up space in the rear alley, cutting out natural lighting to the neighboring structures as well as the birthplace.

Impacts on Natural Resources

There would be no impacts on natural resources.

Impacts on Visitor Use and Interpretation

As in alternative 2, the quality of the visitor's experience would be significantly improved. The site would be fully accessible (except for a few exhibit cases), and the interior comfort provided by the central air system would allow for use during hot days. Improved and expanded range of programs could attract more visitors. The expanded and comprehensive interpretation of the site would allow a better understanding of the site's themes, which would be a positive impact for visiting school groups.

Impacts on NPS Operations

The installation of an elevator up to the auditorium level would make the site accessible to all visitors without staff assistance. The extended hours would require more interpretive and maintenance staff. The addition of a central air system would provide interior comfort. All actions would be a positive impact on site management. The hiring of additional staff would be a positive impact on site management and operations.

Cumulative Impacts

There would be no additional cumulative impacts. The continuing special events and concerts and the Police Awards Ceremony would continue to be a positive impact on the site and surrounding community by providing an awareness of the site, its history, and the events that occurred here and by continuing a positive use of the site during evening hours and drawing visitors into the area.

Unavoidable Adverse Impacts / Relationship Between Short-term Uses and Maintenance and Enhancement of Long-term Productivity / Irreversible and Irretrievable Commitment of Resources

Actions proposed by alternative 3 would irreversibly and irretrievably commit historic architectural fabric and historic design elements for both interior and rear facade portions of the structure but would provide space for special use/events. Permanent visual impacts on the exterior of the structure, especially on the rear facade, would result.

Compliance Consultation and Coordination

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

In implementing the general management plans for the six sites (including the previously completed plan for Hamilton Grange [NPS 1995c]) within the Manhattan Sites administrative unit, the National Park Service has complied and will continue to comply with all applicable laws, regulations, and executive orders, including those listed below. Informal consultation with appropriate federal, state and local agencies has been conducted in the preparation of this document. These agencies are listed in the section on "Consultation and Coordination."

Because there are no wetlands or prime and unique farmlands at the five Manhattan Sites discussed in this plan, compliance with Executive Order 11990 "Protection of Wetlands" and analysis of prime and unique farmlands would not be necessary.

NATURAL RESOURCE COMPLIANCE

This *General Management Plan / Environmental Impact Statement* provides disclosure of the planning and decision-making process and potential environmental consequences of the alternatives proposed. This document impact statement was prepared based on the need to adequately analyze and understand the consequences of the impacts related to the proposed park developments and to involve the public/other agencies in the decision-making process.

The environmental impacts were prepared in accordance with the Council on Environmental Quality regulations pertaining to the implementation of the procedural provisions of the National Environmental Policy Act (40 CFR 1500 et seq.) and in part 516 of the U.S. Department of the Interior's *Departmental Manual* (516 DM). Various agencies will be contacted and consulted as part of this planning and assessment effort. Appropriate federal, state, and local agencies will be contacted for input, review, and permitting in coordination with other legislative and executive requirements. Consultation will be sought with other agencies to address specific issues and concerns pertaining to endangered and threatened species and coastal zone management.

National Environmental Policy Act of 1969 (as amended)

This document provides public disclosure of the planning and decision-making process and the potential environmental consequences of actions and alternatives, as required by this act. The *Final General Management Plan / Environmental Impact Statement* for the five sites will be on public review for 30 days. A decision will be made after public comment and review, and a decision of record will be issued. The record of decision will document the final decision and the alternatives considered, identify the environmentally preferable alternative, and describe whether all practicable means of avoiding environmental impacts as a result of the selected action have been adopted. The record of decision will be prepared and circulated to interested parties.

Floodplains Management

Executive Orders 11988 " Floodplain Management" and 11990, "Protection of Wetlands," directed federal agencies to avoid development in floodplains and wetlands whenever there is a practicable alternative and to avoid, to the extent possible, adverse impacts associated with the occupancy or modification of floodplains and wetlands.

The U.S. Federal Emergency Management Agency has inventoried floodplains in the area and has determined that Castle Clinton and Saint Paul's Church are in the floodplain. New construction activities or storage of collections at either site would require further analysis and that a statement of findings be written. The statement of findings would be prepared to document the rationale for locating structures and collections within the floodplain and to identify mitigating actions to protect life and property at these two sites.

Endangered and Threatened Species and Critical Habitat

The U.S. Fish and Wildlife Service has advised the National Park Service that, except for occasional transient individuals, no species listed or proposed for listing on federal or state lists as endangered or threatened species are known to exist in the project areas at Theodore Roosevelt Birthplace National Historic Site and Saint Paul's Church National Historic Site. Therefore, no biological assessment or further section 7 consultation under the Endangered Species Act (87 Stat. 884, as amended; 16 USC 1531 et seq.) is required with the U.S. Fish and Wildlife Service for alternatives proposed at these locations.

However, the peregrine falcon *(Falco peregrinus)* is a federally listed endangered species that is known to breed near Castle Clinton National Monument, Federal Hall National Memorial, and at General Grant National Memorial, and it may be found in the surrounding areas. This *General Management Plan* presents alternatives for future management of these areas and has evaluated the potential direct, indirect, and cumulative effects of specific project-related activities on this species. The U.S. Fish and Wildlife Service, as well as the New York State Department of Environmental Conservation and the City of New York Department of Environmental Protection would be consulted pertaining to the impacts analyzed by this document and the mitigation proposed to ensure that these proposed actions would not have an effect on this species or its critical habitat. If the mitigation proposed adequately addresses and protects the peregrines and their habitat as determined during the consultation process, then no further compliance with this act would be required.

However, actions proposed by alternative 2 at General Grant's tomb have been identified as having potential detrimental impacts on this species. If that alternative is selected as the course of action to be pursued at the tomb, then further environmental analysis to determine specific impacts and appropriate mitigation would be required, including a biological assessment. The National Park Service would work closely with these cooperating agencies to ensure that the species has appropriate consideration and protection in the decision-making process.

U.S. Army Corps of Engineers

The U.S. Army Corps of Engineers has been regulating activities in the nation's waters since 1890. Until the 1960s the primary purpose of the regulatory program was to protect navigation. Since then, as a result of laws and court decisions, the program has been broadened so that it now considers the full public interest for both the protection and use of water resources.

Regulatory authority and responsibilities of the Corps of Engineers includes section 404 of the Clean Water Act (33 USC 1344). This includes the regulation of the discharge of dredged material into waters of the United States including both navigable waters and adjacent wetlands. In addition, section 10 of the Rivers and Harbors Act of 1899 (33 USC 403) is regulated by the Corps of Engineers for activities in or affecting navigable waters.

Because the actions proposed would not impact any of these waters, no further compliance is required under the 404 regulatory program.

New York State and Local Permitting

In accordance with the New York State Environmental Quality Review Act (1976, part 617 of statewide rules and regulations as amended), activities proposed by this action would be reviewed for compliance and permitting as required by the state. It would be determined through coordination with the state and local agencies which permits would be required for compliance purposes. A Department of Environmental Conservation joint permit application would be completed for those activities that require evaluation.

In addition, the city of New York conducts an environmental review process similar to the state's. The city environmental quality review (Executive Order 91 of 1977 as amended) requires consultation and permitting for applicable projects, which is handled by both the state Department of Environmental Protection and the Department of City Planning. Coordination with the city would ensure that the alternatives selected for implementation would be in accordance with their mandates. Removal of the structural features associated with the skylights at Theodore Roosevelt Birthplace would be an adverse affect.

CULTURAL RESOURCE COMPLIANCE

All structures would be made accessible to visitors with disabilities to the greatest extent possible. In some instances, it might be difficult to achieve full access without compromising the architectural integrity of these structures. If the New York state historic preservation officer and the Advisory Council on Historic Preservation determines that these actions would have a negative effect on these historic properties, then the design concept would be altered accordingly.

Architectural Barriers Act of 1968 (42 USC 4151 et seq.); Rehabilitation Act of 1973 (29 USC 701 et seq.)

All facilities and programs developed would be accessible to visitors with disabilities to the greatest extent possible.

Public Law 90-480 established standards for physical access. Any new facilities would be designed for accessibility by visitors and staff with disabilities. Historic structures require special treatment, and any modifications must be done with the participation of a historic architect and with the appropriate clearances. Alternative methods of accessibility must be considered, and the alternative providing the most accessibility should be the preferred. Inaccessible areas should be made available through other means.

Interpretive media should be accessible. All video and films should be close-captioned. Basic information brochures should be taped for the visually impaired. Major exhibit areas should have taped descriptions of the exhibits. Wayside exhibits should be designed with special populations in mind, regarding type size, angle, and contrast. Aspects of the visitor experience may be affected by compliance with the Americans with Disabilities Act.

Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470, et. seq.)

Projects that have the potential to affect cultural resources at the sites require compliance with section 106 of the National Historic Preservation Act of 1966, and its implementing regulations, 36 CFR part 800. To facilitate the compliance process by accelerated review of certain specified common activities (programmatic exclusions), the National Park Service negotiated a programmatic agreement with the National Conference of State Historic Preservation Officers and the Advisory Council on Historic Preservation in 1995.

Because all of the sites within Manhattan Sites are listed on the National Register of Historic Places, the National Park Service would continue to preserve and foster these cultural resources in accordance with the law, regulations, policies, and the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. If any actions of the alternatives would affect these resources, the park superintendent would be responsible carrying out the compliance process as stipulated in 36 CFR part 800. This would require that any actions that have the potential to affect cultural resources are identified before implementing those actions and that the affects are assessed. Ways to reduce or avoid harming cultural resources by federal undertakings must also be considered.

The National Park Service would document any proposed action before its implementation. This would assess any project effects and outline actions proposed to mitigate those effects. Specific actions may require monitoring, such as any activities requiring ground disturbance. Before any ground-disturbing activities, a professional archeologist would determine the need for an archeological survey and evaluation. Such studies would be completed before any construction activities, and monitoring during construction would continue to ensure that archeological resources would not be disturbed.

The park superintendent would involve and consult with the state historic preservation officer, the Advisory Council, and the public, as appropriate, during the section 106 process.

Before any ground disturbance caused by implementing the actions of the alternatives, a professional archeologist would determine the need for archeological survey, inventory, and evaluation. Any such studies would be completed before construction activities so that measures to avoid archeological resources would be considered and would meet the needs of the state historic preservation officer and the National Park Service.

Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations). Under policy established by the secretary of the interior to comply with this executive order, departmental agencies should identify and evaluate, during the scoping and/or planning processes, any anticipated effects, direct or indirect, from the proposed project or action on minority and low-income populations and communities, including the equity of the distribution of the benefits and risks.

If any significant impacts on minority and low-income populations and communities are identified during the scoping and/or planning processes, the environmental document should clearly evaluate and state the environmental consequences of the proposed project or action on minority and low-income populations and communities in the environmental document. However, for each of the management plans for Manhattan Sites, there would be insignificant or no impacts on minority/low-income populations.

TABLE 16. GENERAL MANAGEMENT PLAN ACTIONS AND CULTURAL COMPLIANCE REQUIREMENTS

Implementation of the alternatives for the five sites would require up-to-date research and documentation to fully ascertain the implications of these actions on the resources. The following programmatic exclusions for the actions were determined in consultation with the park's compliance technical expert and with the assessment of effects based on preliminary determinations.

ACTIONS	COMPLIANCE REQUIREMENTS
CASTLE CLINTON NATIONAL MONUMENT	
Alternative 1 — No Action (Minimum Requirements)	
1. Install stanchion system for Statue of Liberty ticket lines	Programmatic exclusion (C1l)
2. Install waysides to exterior area of structure	Programmatic exclusion (C1l)
3. Continue preservation maintenance of structure	Programmatic exclusion (C1a)*
Alternative 2 — Ticket Sales Removal and Visitor Enhancement	
1. Remove nonhistoric ticketing pavilions from interior of the castle	Requires SHPO/ACHP review (for new ticketing facility)
2. Renovate former ticketing facility, or build new structure in Battery Park, for ticketing purposes	Requires SHPO/ACHP review
3. Install waysides to exterior area of structure	Programmatic exclusion (C1l)
4. Continue preservation maintenance of structure	Programmatic exclusion (C1a)*
Alternative 3 — Construction of Performance Facility	
1. Construct structure with roof, incorporating existing fort structure, and add auditorium stage and seating to interior	Requires SHPO/ACHP review
2. Add restroom facilities	Requires SHPO/ACHP review
3. Install new exhibits	Requires SHPO/ACHP review
4. Install new fire detection and alarm systems, as well as environmental and climate control monitoring units and fire suppression system (part of new construction)	Programmatic exclusion (C1k)*
5. Install waysides to exterior area of structure	Programmatic exclusion (C1l)
6. Remove nonhistoric ticketing pavilions from interior of the castle	Requires SHPO/ACHP review (for new ticketing facility)
7. Renovate former ticketing facility, or build new structure in Battery Park, for ticketing purposes	Requires SHPO/ACHP review

TABLE 16. GENERAL MANAGEMENT PLAN ACTIONS AND COMPLIANCE REQUIREMENTS (CONT.)

ACTIONS	COMPLIANCE REQUIREMENTS
FEDERAL HALL NATIONAL MEMORIAL	
Alternative 1 - No Action (Minimum Requirements)	
1. Continue structural monitoring and preservation maintenance of structure	Programmatic exclusion (C1a,C1i)*
2. Upgrade access of building at Pine Street entrance for visitors and employees with disabilities	Requires SHPO/ACHP review
3. Install waysides	Programmatic exclusion (C1l)
Alternative 2 — Restoration and Preservation	
1. Continue structural monitoring and preservation maintenance of structure	Programmatic exclusion (C1a,C1i)*
2. Upgrade access of building at Pine Street entrance for visitors and employees with disabilities	Requires SHPO/ACHP review
3. Develop and install visitor information center using interior space	Requires SHPO/ACHP review
4. Install new exhibits	Requires SHPO/ACHP review
5. Install environmental and climate control monitoring units and fire suppression system	Programmatic exclusion (C1c, C1k)*
6. Install waysides	Programmatic exclusion (C1l)
Alternative 3 — Visitor Information Center	
1. Continue structural monitoring and preservation maintenance of structure	Programmatic exclusion (C1a,C1i)*
2. Upgrade access of building at Pine Street entrance for visitors and employees with disabilities	Requires SHPO/ACHP review
3. Develop and install visitor information center using interior space	Requires SHPO/ACHP review
4. Install new exhibits	Requires SHPO/ACHP review
5. Install environmental and climate control monitoring units and fire suppression system	Programmatic exclusion (C1c, C1k)*
6. Develop and construct lecture/auditorium space in interior space	Requires SHPO/ACHP review
7. Expand collection storage space, which may require the reconfiguration of interior space	Requires SHPO/ACHP review
8. Install waysides	Programmatic exclusion (C1l)

TABLE 16. GENERAL MANAGEMENT PLAN ACTIONS AND COMPLIANCE REQUIREMENTS (CONT.)

ACTIONS	COMPLIANCE REQUIREMENTS
GENERAL GRANT NATIONAL MEMORIAL	
Alternative 1 - No Action (Minimum Requirements)	
1. Continue preservation maintenance of structure and interior components	Programmatic exclusion (C1a,i)*
2. Modify building to allow access for visitors with disabilities, including a chairlift and ramp system on the exterior	Requires SHPO/ACHP review
3. Install new climate control system	Requires SHPO/ACHP review
4. Install new exhibits	Requires SHPO/ACHP review
5. Install waysides	Programmatic exclusion (C1l)
6. Adjust interior viewing circle to allow to allow views of sarcophagi for all visitors	Requires SHPO/ACHP review
Alternative 2 - Restoration of Site to Original Design	
1. Obtain legislation for boundary change	Requires congressional action
2. Transfer city park land to National Park Service	Requires state and local legislative action
3. Reconstruct entry of tomb	Requires SHPO/ACHP review
4. Rehabilitate southwest interior staircase	Requires SHPO/ACHP review
5. Reconstruct southeast interior staircase	Requires SHPO/ACHP review
6. Restore window treatment	Requires SHPO/ACHP review
7. Paint interior, covering 1938 murals in the reliquary rooms and the 1968 murals in the lunettes	Requires SHPO/ACHP review
8. Reconstruct bronze flag display cases for the reliquary rooms	Requires SHPO/ACHP review
9. Remove interior statuary	Requires SHPO/ACHP review
10. Rebuild exterior roof layer w/bricks and skylight	Requires SHPO/ACHP review
11. Add exterior statuary	Requires SHPO/ACHP review
12. Redesign plaza area, including the removal of trees and paved area	Requires SHPO/ACHP review
13. Relocate mosaic benches	Requires SHPO/ACHP review
14. Continue preservation maintenance of structure and interior components	Programmatic exclusion (C1a,i)*
15. Modify building to allow access to visitors with disabilities, including a chairlift and ramp system on the exterior	Requires SHPO/ACHP review
16. Install waysides	Programmatic exclusion (C1l)

TABLE 16. GENERAL MANAGEMENT PLAN ACTIONS AND COMPLIANCE REQUIREMENTS (CONT.)

ACTIONS	COMPLIANCE REQUIREMENTS
GENERAL GRANT (CONT.)	
Alternative 3 - Continuum of Grant Memorialization	
1. Obtain legislation for boundary change	Requires congressional action
2. Transfer city park land to National Park Service	Requires state and local legislative
3. Continue preservation maintenance of structure and interior components	Programmatic exclusion (C1a,i)*
4. Modify building to allow access to visitors with disabilities, including a chairlift and ramp system on the exterior	Requires SHPO/ACHP review
5. Restore window treatment	Requires SHPO/ACHP review
6. Restore reliquary rooms, including murals and bronze flag cases	Requires SHPO/ACHP review
7. Replace marble floor at sarcophagi level	Requires SHPO/ACHP review
8. Adjust interior views of sarcophagi to allow views for all visitors	Requires SHPO/ACHP review
9. Rehabilitate viewing pavilion into visitor center	Requires SHPO/ACHP review
10. Install fence around site perimeter	Programmatic exclusion (C1h)*
11. Install waysides	Programmatic exclusion (C1l)
SAINT PAUL'S CHURCH NATIONAL HISTORIC SITE	
Alternative 1 - No Action (Minimum Requirements)	
1. Continue preservation maintenance of structures and grounds maintenance of site	Programmatic exclusion (C1a,b)*
2. Continue preservation maintenance of gravestones	Programmatic exclusion (C1a)*
3. Add path system in cemetery	Requires SHPO/ACHP review
4. Install waysides	Programmatic exclusion (C1l)
5. Install environmental and climate control monitoring units and fire suppression system	Programmatic exclusion (C1c, C1k)*
Alternative 2 - National Park Service Management of the Site	
1. Continue preservation maintenance of structures and grounds maintenance of site	Programmatic exclusion (C1a,b)*
2. Continue preservation maintenance of curatorial collection, including gravestones	Programmatic exclusion (C1a)*
3. Install picnic area in village green	Requires SHPO/ACHP review
4. Add new interpretive exhibits	Requires SHPO/ACHP review
5. Add possible path system in cemetery	Requires SHPO/ACHP review
6. Install waysides	Programmatic exclusion (C1l)
7. Install environmental and climate control monitoring units and fire suppression system	Programmatic exclusion (C1c, C1k)*
8. Install site perimeter fence in previously undisturbed areas	Requires SHPO/ACHP review

TABLE 16. GENERAL MANAGEMENT PLAN ACTIONS AND COMPLIANCE REQUIREMENTS (CONT.)

ACTIONS	COMPLIANCE REQUIREMENTS
THEODORE ROOSEVELT BIRTHPLACE NATIONAL HISTORIC SITE	
Alternative 1 - No Action (Minimum Requirements)	
1. Continue preservation maintenance of the site	Programmatic exclusion (C1a)*
2. Modify building to allow access to visitors with disabilities, including exterior and interior ramp systems	Requires SHPO/ACHP review
3. Install waysides	Programmatic exclusion (C1l)
Alternative 2 - Enhancement of Visitor and Interpretive Facilities	
1. Continue preservation maintenance of the site	Programmatic exclusion (C1a)*
2. Modify building to allow access for visitors with disabilities, including exterior and interior ramp systems	Requires SHPO/ACHP review
3. Install central air-conditioning system throughout building	Requires SHPO/ACHP review
4. Install museum humidification and climate control system	Programmatic exclusion (C1c)
5. Restore library to 1923 appearance	Requires SHPO/ACHP review
6. Install closet elevator from third to fourth floor	Requires SHPO/ACHP review
7. Install waysides	Programmatic exclusion (C1l)
Alternative 3 - Full Site Accessibility	
1. Continue preservation maintenance of the site	Programmatic exclusion (C1a)*
2. Modify building to allow access to visitors with disabilities, including exterior and interior ramp systems	Requires SHPO/ACHP review
3. Install central air-conditioning system throughout building	Requires SHPO/ACHP review
4. Install museum humidification and climate control system	Programmatic exclusion (C1c)
5. Restore library to 1923 appearance	Requires SHPO/ACHP review
6. Install modern elevator from basement to fourth floor auditorium	Requires SHPO/ACHP review
7. Install waysides	Programmatic exclusion (C1l)

* Must be reviewed by park and found to meet conditions in the programmatic agreement, stipulation C, before they can be finally determined to be programmatic exclusions.

CONSULTATION AND COORDINATION

The initial public presentations of the Manhattan Sites *General Management Plan* were made at open houses held at each site. These events had been advertised in advance through newspaper ads and posters at the sites. Park staff and planning team members made the presentations through several hours at each site, supported by graphic displays representing each alternative. Copies of the preliminary alternatives were distributed to the public, along with a request for written comments.

The *General Management Plan* for Manhattan Sites was put on hold while the *Hamilton Grange General Management Plan* was completed. Meetings pertaining to the five sites were postponed during this time. The following is a list of the recorded meetings.

1992

March — Manhattan Community Board #9, general board meeting. Superintendent presented preliminary alternatives for Hamilton Grange and Grant's tomb.*

April — Open house at Hamilton Grange. General discussion of alternatives and their impact on the immediate neighborhood. Approval expressed by several residents of area for moving the Grange to restore architectural integrity.*

Open houses at Grant's tomb, Saint Paul's Church, Theodore Roosevelt Birthplace, and Federal Hall and Castle Clinton (which was held at Federal Hall).

Harbor Park Advisory Council, presentation on Castle Clinton to the steering committee

Harbor Park Advisory Council, presentation on Castle Clinton to the full council

May — St. Mary's Church, "town hall" meeting regarding Hamilton Grange and Grant's tomb.*

Presentation on Theodore Roosevelt Birthplace to Manhattan Community Board #5

Presentation on Castle Clinton and Federal Hall to Manhattan Community Board #1

Presentation on Grant's tomb and Hamilton Grange to Manhattan Community Board #9

Presentation on Castle Clinton to Manhattan Community Board #1

June — Fine Arts Federation. Preliminary alternatives for the Manhattan Sites were reviewed.

Municipal Arts Society. Preliminary alternatives for the Manhattan Sites were reviewed.

Presentation on Castle Clinton and Federal Hall to Manhattan Community Board #1, committees on parks and landmarks

August — Legislative update at Federal Hall (regarding Hamilton Grange, Grant's tomb, and Federal Hall). Superintendent provided information for legislative aides and city and state government representatives. Superintendent reported that the public comments received have identified three controversial issues: relocation of Hamilton Grange, relocation of mosaic benches at Grant's tomb, and termination of exclusive use of portions of Federal Hall. Suggestions were made that the Park Service explore transfer of part of Riverside Park surrounding Grant's tomb from the city Department of Parks and Recreation and that the plan for Hamilton Grange include development of the current site after the house is moved, as well as additional parking and full-time security at the site. Finally, it was agreed that the propsed action for Hamilton Grange should be presented at a general public meeting, to be attended by those public officials represented at that meeting.

Presentation to Saint Paul's and Saint Paul's board

November — Presentation to Saint Paul's and Saint Paul's board

1993

June — Presentation on Castle Clinton and Federal Hall to Downtown-Lower Manhattan Association

1996

May — Public meeting at Federal Hall to discuss the draft document; focus was on Federal Hall and Castle Clinton

Two public meetings to discuss the draft document, held at Grant's tomb and at the Interchurch Center, focusing on Grant's tomb.

Public meetings at Theodore Roosevelt Birthplace to discuss the draft document; focus was on Theodore Roosevelt Birthplace

Meeting with Manhattan Community Board #9, Parks Committee, regarding Grant's tomb

Meeting with Manhattan Community Board #9, Landmarks Committee, regarding Grant's tomb

Meeting with the full board of Manhattan Community Board #9 regarding Grant's tomb

	Meeting with Manhattan Community Board # 1 regarding Federal Hall and Castle Clinton
	Meeting with Community Board #3 regarding Theodore Roosevelt Birthplace
	Meeting with executive director of the Theodore Roosevelt Association regarding Theodore Roosevelt Birthplace
	Meetings with the chairman of the Constitutional Education Foundation regarding Federal Hall
June	A public meeting at Saint Paul's Church to discuss the draft document; focus was on Saint Paul's Church
	Two public meetings at Saint Paul's Church with elected officials or their representatives, local historians and representatives of local historical organizations, NPS staff, and professors of three local colleges to discuss the change in interpretive focus at Saint Paul's Church
July	Three meetings with Saint Paul's task force, including NPS interpretive staff, historians, and other professionals in this field of study (as above) to further discuss the change in the interpretive focus at Saint Paul's Church

* Although Hamilton Grange was the focus of these meetings, the preliminary alternatives for some of the other sites were also discussed.

LIST OF AGENCIES AND ORGANIZATIONS WHO RECEIVED OR REVIEWED COPIES OF THE *DRAFT PLAN / ENVIRONMENTAL IMPACT STATEMENT*

The draft document was prepared in consultation with or was distributed to the following agencies, organizations, and individuals. An * indicates that comments were received on the *Draft General Management Plan / Environmental Impact Statement.*

U.S. CONGRESS

Nita M. Lowey, Member of Congress*
222 Mamaroneck Avenue, Suite 310
White Plains, NY 10605

Honorable Charles B. Rangel
House of Representatives
163 West 125th Street
New York, NY 10027-4404

Linda Rosenstadt/Neil Goldstein
Office of Congressman Jerry Nadler
1841 Broadway, Suite 800
New York, NY 10027

Many Ross
Office of Congresswoman Valasquez
815 Broadway, 1st Floor
Brooklyn, NY 11229

John Wade
Office of Congresswoman Maloney
950 Third Avenue, 19th Floor
New York, NY 10022

FEDERAL AGENCIES

Advisory Council on Historic Preservation
Don Klima
Eastern Office of Review
Old Post Office Building
1100 Pennsylvania Avenue, NW Suite 803
Washington, D.C. 20004

Cooper-Hewitt Museum
The Smithsonian Institution's National Museum of Design
2 East 91st Street
New York, NY 10128

Environmental Protection Agency
Region 2
Office of Policy and Management
26 Federal Plaza, Room 500
New York, NY 10278

Environmental Protection Agency*
Region II
Robert Hargrove, Chief
Environmental Impacts Branch
Jacob K. Javits Federal Building
New York, NY 10278-0012

STATE AGENCIES

Mr. Albert Appleton, Commissioner
Environmental Protection, Room 2358
1 Centre Street
New York, NY 10007

Honorable Herman D. Farrell Jr.
Assemblymember
2341-55 7th Avenue
New York, NY 10030

New York State Office of Parks, Recreation, and Historic Preservation*
Julia S. Stokes, Deputy Commissioner for Historic Preservation
Peebles Island
P.O. Box 189
Waterford, NY 12188-0189

State Senator David A. Paterson
163 West 125th Street, Suite 932
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Ray Saltini
Office of State Senator Leichter
656 West 181st Street
New York, NY 10033

Assemblyman Keith L. Wright
Adam Clayton Powell, Jr. State Office Building
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New York, NY 10027

LOCAL AGENCIES

Community Board No. 1*
49-51 Chambers Street, Room 712
New York, NY 10007
Ms. Anne Compoccia, Chair
Mr. Paul Goldstein, District Manager

Community Board No. 2
3 Washington Square Village, Apt. 1-A
New York, NY 10012
Ms. Carol Feinman, Chair

Community Board No. 3
59 E. 4th Street
New York, NY 10003
Mr. Luis Soler, Chair
Ms. Martha Danziger, District Manager

Community Board No. 4
330 West 42nd Street, Suite 2618
New York, NY 10036
Ms. Ross Graham, Chair
Ms. Julia Fitzgerald, District Manager

Community Board No. 5
450 7th Ave.
New York, NY 10123
Mr. Nicholas Fish, Chair
Ms. Joan E. Ramer, District Manager

Community Board No. 6
330 East 26th Street
New York, NY 10010
Mr. Lou Sepersky, Chair
Ms. Carol Pieper, District Manager

Community Board No. 7
250 W. 87th Street, 2nd Fl.
New York, NY 10024
Ms. Elizabeth Starkey, Chair
Ms. Penny Ryan, District Manager

Community Board No. 8
309 E. 94th Street
New York, NY 10128
Ms. Barbara J. Chocky, Chair
Mr. Edward Benson, District Manager

Community Board No. 9*
565 West 125th Street
New York, NY 10027
Mr. Theodore T. Kovaleff, Chair
Mr. Lawrence McClean, District Manager

Community Board No. 10
215 West 128th Street, 3rd Floor
New York, NY 10027
Ms. Barbara Askins, Chair
Ms. Linda Wood, District Manager

Community Board No. 11
55 East 115th Street
New York, NY 10029
Mr. Eddie Baca, Chair
Mr. Francisco Diaz, District Manager

Community Board No. 12
711 West 168th Street, Ground Floor
New York, NY 10032
Mr. Marvin Higgen, Chair
Ms. Maria Rivera, Acting District Manager

The Council of the City of New York*
Kathryn E. Freed
Council Member, 1st District
City Hall
New York, NY 10007

Lower Manhattan Cultural Council
Jerry Dixon, Executive Director
1 World Trade Center
Suite 1717
New York, NY 10048

Manhattan Borough
Ruth Messinger, President
Municipal Building, 19th Floor So.
New York, NY 10007

New York City Department of Parks and Recreation
Stephen C. Whitehouse, Director of Planning
The Arsenal
Central Park
New York, NY 10021

ORGANIZATIONS

Circle Line / Statue of Liberty Ferry, Inc.*
17 Battery Place, Suite 715
New York, NY 10004-1101

The Civil War Round Table of New York*
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83-12 St. James Street
Elmhurst, NY 11373-3758

Constitutional Education Foundation
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Jewett House
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Washington, D.C. 20009

Emmanuel Pieterson Historical Society
Horace Carter, President
P.O. Box 733
Manhattanville Station
New York, NY 10027

The Fine Arts Federation of New York
Roy Gussow, President
40-40 24th Street
Long Island City, NY 11101

Grant Monument Association*
36 Carole Avenue
New Hyde Park, NY 11040-1964

Hamilton Grange Community Task Force to Prevent the Removal of the Grange
Rev. Johan Johnson, Task Force Coordinator
435 W. 141st Street
New York, NY 10031

Hamilton Heights Homeowners Association
John Cardwell, President
P.O. Box 565
Hamilton Grange Station
New York, NY 10031

Landmarks Harlem, Inc.
Ms. Sandi Griffin, Chair
Thomas J. Bess, Executive Director
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New York, NY 10030

National Trust for Historic Preservation
Vicki Jo Sandstead, Director
Northeast Regional Office
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Society for the Preservation of Weeksville & Bedford Stuyvesant History
Joan Maynard, Executive Director
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John A. Gable, Executive Director
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Oyster Bay, NY 11771

INDIVIDUALS

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Francis Redhouse
Charles Roda*
Helen Roosevelt
Robert Stenzel*
David Treacy*
Timothy Van Dam

D. J. Wellington, MD
Ronald F. Wagner
Caroline Waloski-Weinman
Colette C. Whitlock
Jim Williams

WRITTEN COMMENTS FROM AGENCIES, ORGANIZATIONS, AND INDIVIDUALS

During the review period, the National Park Service received 14 letters commenting on the draft plan. Specific comments, marked in the following letters, focused on Castle Clinton, Grants tomb, and Saint Paul's Church. All letters have been printed in the following section, and responses are given to letters with substantive comments.

COMMENTS

COMMITTEE ON APPROPRIATIONS
SUBCOMMITTEES:
LABOR, HEALTH AND HUMAN SERVICES, AND EDUCATION
AGRICULTURE, RURAL DEVELOPMENT, FOOD AND DRUG ADMINISTRATION, AND RELATED AGENCIES
CO-CHAIR, CONGRESSIONAL CAUCUS FOR WOMEN'S ISSUES
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87-46 QUEENS BOULEVARD
SUITE 900
REGO PARK, NY 11374
(718) 897-2602
FAX (718) 897-2604

CRISTON I. WILL LIBRARY
1500 CENTRAL PARK AVENUE
YONKERS, NY 10710
(914) 779-6766
(BY APPOINTMENT)

SUNY MARITIME ACADEMY
AT FORT SCHUYLER
BRONX, NY 10465
(718) 829-8027
(BY APPOINTMENT)

May 31, 1996

Mr. Joseph Avery
Superintendent, Manhattan Site
National Park Sercice
New York, NY 10005

Dear Mr. Avery:

I am writing to express my concern regarding the recent actions of the National Park Service with respect to the change in focus at St. Paul's Church National Historic Site in Mount Vernon, N.Y.

I join with local elected officials in protesting the Park Service's failure to:

1a 1) notify the public before removing the memorabilia from the Bill of Rights Museum,
2) consult the public when developing alternate plans for the site, and
3) give adequate notice to local elected officials, community leaders, historians, park activists and members of the public of the new site plans and of a meeting at which the alternate plans will be discussed.

As you may recall, I first wrote to the National Park Service about this matter in October 1994 after former Congressman Richard Ottinger and several constituents contacted me to protest the removal of dioramas and the printing press replica from the Bill of Rights Museum. At that time and again in March 1995 when I toured the site with Congressman Ottinger, I

1b was assured that the public would be given full opportunity to comment on the future direction of the St. Paul's Church site. I do not believe that the Park Service's limited distribution of the new plan, received only three weeks before the Park Service's meeting with the public, lives up to that commitment. My office received the plan on May 13, along with your request to mail you written comments by May 20.

As my October 1994 letter to the Park Service indicated, I worked to secure funding for recent repair and renovation projects at the St. Paul's site. I do not believe that the

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RESPONSES

Congresswoman Lowey sent a letter to the Manhattan Sites superintendent on May 31, 1996. The park superintendent officially responded to her by a letter dated June 7, 1996. The following responses are a summary of the superintendent's responses.

1a. The planning process began in 1992 with the release of preliminary alternatives, but none were identified as preferable by the National Park Service. The first public meeting regarding this plan was held in April 1992, with little attendance and response. An open meeting of the board of the cooperating association, The Society of the National Shrine of the Bill of Rights at Saint Paul's Church, Eastchester, Inc., was held in November 1992, with limited participation.

Further progress on the general management plan for Saint Paul's Church National History Site, as well as four other Manhattan Sites, was delayed while efforts focused on finalizing a plan for Hamilton Grange National Memorial. (Hamilton Grange was in serious need of repairs, and other issues made it an urgent project.) Following an extensive series of public meetings, a final plan for that site was approved in 1995.

The general management plan for the remaining Manhattan Sites began again, and the draft document was completed in early April 1996. A series of meetings to which the public was invited were held at each of the sites. There was a public meeting at Saint Paul's Church during the first week of June, which was attended by about 35 people; the meeting provided an opportunity for the National Park Service to discuss the planning process and the *Draft General Management Plan*. Additional meetings were held in July 1996, and ongoing discussions regarding the site and the planning process have occurred throughout the review process.

1b. The *Draft General Management Plan* was released to the public for review on April 19, 1996, with the comment period ending on June 14, 1996. The Notice of Availability and Public Comment Period of the document was published in the *Federal Register*, vol. 61, no. 68, on April 8, 1996.

COMMENTS

1c

removal of the Zenger exhibits and the revamping of the museum into a local history museum, as the plans propose, is in keeping with the intent of the Omnibus Parks Bill of 1978. It was clearly the intent of the Congress in passing the Omnibus Parks Bill of 1978 that St. Paul's Church be maintained as a National Historic Site in light of its prominent role in the preservation of liberties in the early years of our nationhood.

1d

I would appreciate your prompt response to the concerns raised by me and the local elected officials and historians who wrote to you on May 29. I strongly believe that any new direction for St. Paul's National Historic Site should be determined only after an extensive public dialogue with the community. For that

1e

reason, I ask you to extend the period for public comment until at least September 1 of this year and to schedule additional meetings with local elected officials, community leaders, historians, park activists and other interested parties between June 4 and the close of the public comment period.

Sincerely,

Nita Lowey

Nita M. Lowey
Member of Congress

NML:pk

RESPONSES

1c. The Zenger exhibit had been purchased for Federal Hall in 1953 and was at that location for 31 years before its removal to Saint Paul's Church. To fill an empty museum at the least possible expense, the expedient decision was made in 1984 to place this exhibit at Saint Paul's Church after that site became the responsibility of the National Park Service. However, because Federal Hall was the site of Zenger's trial (as well as of the passage of the Bill of Rights), the exhibit has recently been returned to Federal Hall to tell the story at the location of the events described.

1d. In March 1995 a new educational exhibit was placed at Saint Paul's; this exhibit has created expanded educational programs and opportunities. Many hands-on activities are now offered that could not have been accommodated in the previous museum environment, and these activities are providing young visitors with better interpretive and educational programs.

New programs and exhibits related to all aspects of the history of Saint Paul's Church and the surrounding area are constantly being researched and developed in coordination with local and interested historians, organizations, and the public. It is the intention of the National Park Service to discover as much of the actual history of this site as possible and to share it with the public as effectively as possible.

1e. The public review and response period was extended to August 1, 1996, with continued public dialogue on all park-related issues.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAY 07 1996

Joseph T. Avery
Superintendent
National Park Service
Manhattan Sites
26 Wall Street
New York, New York 10005

Class: LO

Dear Mr. Avery:

The Environmental Protection Agency (EPA) has reviewed the National Park Service's draft environmental impact statement and general management plan for five of the six sites collectively administered as the Manhattan Sites. These include: Castle Clinton National Monument; Federal Hall National Memorial; General Grant National Memorial; Saint Paul's Church National Historic Site; and Theodore Roosevelt Birthplace National Historic Site. This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C. 7609, PL 91-604 12(a), 84 Stat. 1709), and the National Environmental Policy Act.

The proposed plans collectively present a series of alternatives for each site for future management and use of these sites. These alternatives have been developed in an attempt to respond to planning concerns, such as resource preservation and presentation, enhanced visitor services, and security and structural conditions at the sites. For each site, a preferred alternative is indicated.

EPA believes that the implementation of any of the proposed project alternatives will not result in significant adverse environmental impacts. Therefore, in accordance with EPA policy, we have rated this project as LO, indicating that we do not object to implementation of the project.

Should you have any questions concerning our comments, please contact Maeve Arthars of my staff at (212) 637-3515.

Sincerely yours,

Robert W. Hargrove, Chief
Environmental Impacts Branch

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2. No response necessary.

COMMENTS

New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island, PO Box 189, Waterford, New York 12188-0189 518-237-8643

Bernadette Castro
Commissioner

May 3, 1996

Joseph T. Avery
Superintendent
National Park Service
Manhattan Sites
26 Wall Street
New York, New York 10005

Dear Mr. Avery:

Re: NPS
General Management Plan/
Manhattan Sites
Manhattan/Mount Vernon
New York/Westchester Counties
96PR0864

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed your project in accordance with Section 106 of the National Historic Preservation Act of 1966 and the relevant implementing regulations.

Based on the General Management Plan which you submitted, the SHPO would like to provide the following comments:

- None of the alternatives proposed for General Grant National Memorial, Federal Hall National Memorial, St. Paul's Church NHS or Theodore Roosevelt Birthplace NHS would significantly impact or alter the characteristics which make these properties eligible for listing on the National Register of Historic Places. More specific comments regarding individual treatments at each of these sites is contingent upon which alternative is eventually chosen. These are more appropriately addressed during Section 106 consultation undertaken between the NPS and the SHPO as individual projects are progressed.

3a

- The SHPO feels that the significant impacts associated with Alternative 3 at Castle Clinton National Monument warrant a re-evaluation of this as the preferred alternative. It is the SHPO opinion that Castle Clinton's period of greatest significance was during the period when it served as an immigrant processing station prior to the opening of Ellis Island. We therefore feel that either Alternative 1 or 2 is the more appropriate scheme for this resource.

3b

The SHPO would like to thank the NPS for the opportunity to comment on these important resources. We look forward to further consultation with your office as part of the Section 106 process.

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RESPONSES

3a. Comment noted.

3b. The redesign of Castle Clinton to accommodate cultural and performance uses reminiscent of the Castle Garden period would require the construction of a roofed structure within the historic walls of the fortification period. Careful design (in accordance with the *Secretary of Interior's Standards for the Treatment of Historic Properties*) and construction techniques would prevent impacts on the historic fabric.

Although the structure would reflect the use of the structure during the Castle Garden era, this would not preclude the interpretation of the other significant periods of the structure's history. The site's historically significant periods, including its military history, the immigrant processing station, the entertainment of Castle Garden, and the aquarium, would be fully interpreted.

Please use our project review identification number if additional correspondence is necessary. If you have any questions, please do not hesitate to call me at (518) 237-8643, Ext. 282.

Sincerely,

Gerald L. Brewington

Gerald L. Brewington
Junior Historic Sites
Restoration Coordinator

GB:

COMMENTS

COMMUNITY BOARD NO. 1
CITY OF NEW YORK

Anne Compoccia
Chairperson

Paul Goldstein
District Manager

May 7, 1996

Mr. Joe Avery
Superintendent
National Park Service
26 Wall Street, 3rd Floor
New York, NY 10005

Re: Castle Clinton
and Federal Hall

Dear Mr. Avery:

Please be advised that Community Board #1 has adopted the attached resolution offering our recommendations regarding the future use of Castle Clinton and Federal Hall, which are both located in our district. We urge you to take our input into consideration as you make a final decision regarding these two important historic sites.

Sincerely,

Anne Compoccia
Chairperson

Attachment

cc: J. Nadler
R. Messinger
K. Freed
C. Abate
S. Silver
W. Price

6l.nps

49 Chambers Street · Room 712 · New York, N.Y. 10007-1209 · (212) 442-5050 · FAX: 442-5055

RESPONSES

4. No response necessary.

COMMUNITY BOARD #1 MANHATTAN
RESOLUTION

DATE: APRIL 16, 1996

COMMITTEE OF ORIGIN: ARTS & CULTURAL AFFAIRS

COMMITTEE VOTE: 3 IN FAVOR 0 OPPOSED 0 ABSTAINED
BOARD VOTE: 26 IN FAVOR 0 OPPOSED 1 ABSTAINED

RE: **Castle Clinton and Federal Hall**

WHEREAS: The Manhattan sites of the National Parks Services within the CB #1 district include Castle Clinton National Monument and Federal Hall National Monument, and

WHEREAS: In May and June of 1992 representatives of Manhattan sites came before CB #1 to discuss preliminary plans for the renewal of Castle Clinton National Monument to house a performance facility consistent with the Castle's use during the Castle Garden era, and

WHEREAS: CB #1 passed a resolution in June of 1992 in support of such a concession, now

THEREFORE BE IT RESOLVED THAT: CB #1 is in support of the two general management plans and environmental impact statements developed for the Manhattan sites of the National Parks Service for Castle Clinton National Monument and Federal Hall National Monument respectively, and

BE IT FURTHER RESOLVED THAT: CB #1 is in support of preferred option, alternative 3 as the usage for Castle Clinton, consistent with the Community Board resolution of June 1992 and preferred option, alternative 2 for Federal Hall as reflected in the management plans and environmental impact statements, and

BE IT FURTHER RESOLVED THAT: As no such performance facility exists in the Financial District of New York City, the proposed reconversion of Castle Clinton into a performance facility would be a great addition to the area as it is developing into a mixed use community with an expanded residential population.

6res4.96

SERVING HAMILTON HEIGHTS/MANHATTANVILLE & MORNINGSIDE HEIGHTS

The City of New York

CB9M

565 West 125 Street
New York, New York 10027
(212) 864-6200/Fax # 662-7396

COMMUNITY BOARD #9, MANHATTAN

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Assistant Treasurer

Lawrence T. McClean
District Manager

May 23, 1996

Mr. Joseph T. Avery
Superintendent
Manhattan Sites
26 Wall Street
New York, NY 10005

Dear Mr. Avery:

At our regularly scheduled General Board meeting held on Thursday, May 16, 1996, the following resolution was passed by a vote of 27 in favor, 0 opposed, 0 abstentions and 0 present but not entitled to vote.

Resolved that Community Board 9 Manhattan supports "Preferred Alternative 3" outlined by the National Parks Service, as listed in the Site Specific Plan Environmental Impact Statement for the General Grant Memorial published February 1996 (NPS/D9) by Resource Planning Group Denver, with regard to the restoration of the Grant's Tomb National Memorial -- with the exception that the surrounding fence be cancelled.

Sincerely,

Maritta Dunn

cc: Elected Officials

5

5. Comment noted.

THE COUNCIL
OF
THE CITY OF NEW YORK
CITY HALL
NEW YORK, N.Y. 10007

KATHRYN E. FREED
COUNCIL MEMBER, 1ST DISTRICT
51 CHAMBERS STREET, ROOM 429
NEW YORK, NEW YORK 10007
PHONE: (212) 788-7722
FAX: (212) 788-7727

CHAIR:
CONTRACTS
COMMITTEE MEMBER:
CONSUMER AFFAIRS
ENVIRONMENTAL PROTECTION
TRANSPORTATION

MAY 15, 1996

JOSEPH T. AVERY, SUPERINTENDENT
MANHATTAN SITES
NATIONAL PARK SERVICE
26 WALL STREET
NEW YORK, NY 10005

RE: GENERAL MANAGEMENT
PLAN (EIS)

DEAR MR. AVERY:

AS THE NEW YORK CITY COUNCIL MEMBER FOR THE FIRST DISTRICT IN MANHATTAN, MY DISTRICT INCLUDES TWO NATIONAL PARK SERVICE'S SITES, NAMELY FEDERAL HALL, A LOVELY BUILDING SO RICH IN HISTORY — ONE OF ITS MORE ILLUSTRIOUS MOMENTS HAVING BEEN ITS USE AS THE SITE OF THE INAUGURATION OF PRESIDENT GEORGE WASHINGTON — AND CASTLE CLINTON.

I WRITE TO VOICE MY ENTHUSIASTIC SUPPORT FOR THE PREFERRED ALTERNATIVES WHICH THE NATIONAL PARK SERVICE HAS IDENTIFIED FOR BOTH STRUCTURES.

PREFERRED ALTERNATIVE (2) FOR FEDERAL HALL NATIONAL MEMORIAL, WOULD CREATE A VISITOR INFORMATION CENTER, INCLUDING STATE-OF-THE ART INTERPRETIVE AND INTERACTIVE EXHIBITS WHICH WOULD PROVIDE INFORMATION ABOUT THE PARK SYSTEM'S SITES NATIONWIDE, AND SPECIFICALLY ABOUT THE LONG AND VARIED HISTORY AND ARCHITECTURE OF FEDERAL HALL. A MUSEUM IN THE BUILDING WOULD ALSO PERMANENTLY HOUSE THE COMBINED FEDERAL HALL AND CASTLE CLINTON MUSEUM COLLECTIONS.

THE PROPOSAL FOR THE **CASTLE CLINTON NATIONAL MONUMENT, ALTERNATIVE (3)** CALLS FOR THE RETURN OF THE STRUCTURE TO A PERFORMANCE FACILITY REMINISCENT OF THE CASTLE GARDEN ERA (1823-35). AS PROPOSED, A ROOF WOULD BE CONSTRUCTED OVER THE CASTLE, HOWEVER, ITS WALLS WOULD REMAIN EXPOSED SO THAT THE HISTORY OF THE CASTLE'S

6. No response necessary.

FORMER FUNCTION AS A FORTRESS WOULD NOT BE LOST. THE OUTDOOR, ENCLOSED, MULTI-PURPOSE PERFORMANCE SPACE WOULD BE THE ONLY ONE OF ITS KIND IN DOWNTOWN MANHATTAN. AND LIKE THE PLAN FOR FEDERAL HALL, NEW EXHIBITS AND PROGRAMS FOR VISITORS WOULD BE INSTALLED IN THE CASTLE.

IT REMAINS LARGELY UNKNOWN THAT CASTLE CLINTON WAS ALSO AN EMBARKATION POINT AND PROCESSING POINT FOR MILLIONS OF IMMIGRANTS LONG BEFORE ELLIS ISLAND. NOTABLY, IT WAS THE PRIMARY POINT OF EMBARKATION FOR IRISH IMMIGRANTS FLEEING STARVATION FROM *THE HUNGER* IN IRELAND

IN ADDITION, THE PROPOSED CHANGES TO THE CASTLE ARE CONSISTENT WITH THE VISION THAT THE *CONSERVANCY FOR HISTORIC BATTERY PARK* --- SO CAPABLY ARTICULATED BY ITS PRESIDENT, WARRIE PRICE --- HAS FOR BATTERY PARK.

AGAIN, I FULLY ENDORSE, AND INDEED WELCOME, THE NATIONAL PARK SERVICE'S PREFERRED ALTERNATIVES FOR BOTH THE FEDERAL HALL NATIONAL MEMORIAL AND CASTLE CLINTON NATIONAL MONUMENT. I BELIEVE STRONGLY THAT WHEN THESE ALTERNATIVES HAVE BEEN IMPLEMENTED, THEIR ENHANCEMENTS WILL CONTRIBUTE HUGELY TO VISITORS AND RESIDENTS OF DOWNTOWN MANHATTAN'S APPRECIATION OF THE AREA'S LONG AND COMPLEX HISTORY AND VARIED AND ENGROSSING ARCHITECTURE, AND OF LOWER MANHATTAN AS A DESTINATION FOR ENRICHING AND EXCITING CULTURAL EVENTS.

I WOULD ALSO LIKE TO SEE ALL OF THE HISTORIC POINTS OF INTEREST, INCLUDING GOVERNORS ISLAND, LIBERTY AND ELLIS ISLANDS, THE TENEMENT MUSEUM AND THE SOUTH STREET SEAPORT, ETC., CONNECTED IN A COMPREHENSIVE WAY FOR VISITORS. THE CITY OF NEW YORK HAS FOR TOO LONG FAILED TO APPRECIATE AND PROMOTE ITS HISTORY, AT THE EXPENSE OF BOTH RESIDENTS AND VISITORS ALIKE. HOPEFULLY, A REVITALIZED FEDERAL HALL AND CASTLE CLINTON WILL HELP REVERSE THIS TREND.

SINCERELY,

KATHRYN E. FREED
COUNCIL MEMBER

NPS.LTR

CIRCLE Line-Statue of Liberty Ferry INC.

STATUE OF LIBERTY NATIONAL MONUMENT • ELLIS ISLAND

May 16, 1996

Mr. Joseph Avery
Superintendent
National Park Service
Federal Hall
26 Wall Street
New York, New York 10005

Dear Mr. Avery,

Thank you for the opportunity to comment on the proposed General Management Plan/Environmental Impact Statement for the Manhattan Sites. Our comments will be limited to that portion of the Plan dealing with Castle Clinton National Monument where National Park Service visitors are ticketed for travel to Liberty and Ellis Islands aboard vessels of Circle Line-Statue of Liberty Ferry, Inc. (CL).

The proposed Plan discusses three (3) alternatives impacting Circle Line-Statue of Liberty Ferry, Inc. operations: Alternative 1, (no action), except for improved ticket sales management (ropes and stanchions) to better define ticket lines; Alternative 2 would remove ticket sales to a location "outside of the fort" and institute "automated ticket sales at various sites throughout the City"; and, Alternative 3 (NPS preferred) may or may not relocate the ticketing function from the Castle Clinton atructure.

DISCUSSION

7a

Alternative 1. This alternative fails to address an existing agreement between National Park Service / Circle Line-Statue of Liberty Ferry, Inc. to provide inclement weather shelter for non-ticket Circle Line-Statue of Liberty Ferry, Inc. employees and secure space for passenger fare receipts. National Park Service agreed in 1986 that these needs would be provided for when Circle Line-Statue of Liberty Ferry, Inc. was forced to move into the fort from its previous quarters in the New York City Park facility near the Staten Island Ferry dock. Circle Line-Statue of Liberty Ferry, Inc. has had numerous meetings with National Park Service to resolve these continuing concerns, but without success. We respectfully suggest that a

7a. Comment noted. Alternative 1 reflects existing conditions at the site. Some accommodation would be discussed when appropriate.

COMMENTS

Page 2

solution be included in this alternative.

Alternative 2. In discussion with National Park Service personnel, we understand that this alternative would involve construction of a separate ticketing facility in Battery Park. Such a facility could be larger than the existing Kiosk to accommodate inclement weather protection for non-ticket Circle Line-Statue of Liberty Ferry, Inc. employees. However, such a free-standing structure in an environment with minimum police protection would exacerbate security risks to passenger fare receipts. 7b

The alternative does not address such critical issues as responsibility for negotiating for occupancy of a suitable site with New York City; construction, financing, etc. 7c

Alternative 2 suggests, also, that "automated ticket sales at various sites throughout the City would also be an option for improving ticket sales management".

Circle Line-Statue of Liberty Ferry, Inc. has grave concerns for the implementation of this option.

First among the concerns of Circle Line-Statue of Liberty Ferry, Inc. is the master of sailings. Rather, the U.S. Coast establishes the rules for sailings with the final authority for safety being vested in each vessel Captain. Such variables as weather, tides, channels and special events in the harbor impact the schedule of sailings. Moreover, any of such variables lasting for protracted periods may prevent any sailings at all during any day.

Secondly, the schedule of sailings is impacted by maintenance activities and special events sponsored by the Parks Department of the City of New York. An example is the recently announced proposal of The Conservancy for Historic Battery Park for the Battery Park Seawall/Promenade Restoration Project. 7d

Thirdly, the final control over number of sailings and passengers permitted to embark for Liberty and Ellis Islands are within the discretion of National Park Service. These decisions are influenced by available National Park Service staffing and the carrying capacity of the Islands. When visitors choose to stay longer than anticipated on one or both islands, ticket sales are reduced for the remainder of the day. On some days ticket selling must be reduced as early as noon. What means will be provided for implementing these orders "at various sites throughout the City"?

Pursuant to specifications prescribed by National Park Service, Circle Line-Statue of Liberty Ferry, Inc. vessels vary in carrying capacity between 450 and 1030. During the peak visitor season the

RESPONSES

7b. The design of a secure ticketing structure would have to take this concern into account.

7c. The purpose of a general management plan is not to evaluate this level of specificity. Issues such as negotiations for occupancy of a suitable site, construction, and financing are critical, and this level of detailed evaluation would be completed at later, more specific stages of planning and development. Throughout all stages of development, coordination with the city of New York would continue.

7d. The proposed action of automated ticket sales at various locations throughout the city has been removed from the plan. The method of ticket sales should be considered in a concessions plan.

Page 3

larger vessels are scheduled for morning service to accommodate the usually larger numbers of visitors who arrive early in the day. Emergency mechanical breakdowns may interfere with such orderly scheduling. Now all visitors wait in line and are loaded on a first-come-first served basis. What is to be the priority for boarding of visitors with pre-sold timed and dated tickets viz-a-viz visitors arriving to purchase tickets on-site?

Circle Line-Statue of Liberty Ferry, Inc. respectfully suggests that such an unstudied option be eliminated from the General Management Plan at this time.

7e

Alternative 3. With the caveat that Circle Line-Statue of Liberty Ferry, Inc. ticketing will not be relocated from the fort and that a secure facility will be provided for passenger fare receipts, Circle Line-Statue of Liberty Ferry, Inc. endorses Alternative 3. A roofed structure would provide shelter for National Park Service visitors and non-ticket Circle Line-Statue of Liberty Ferry, Inc. employees alike during inclement weather.

Please advise me as to how Circle Line-Statue of Liberty Ferry, Inc. may be of further assistance?

I request that Circle Line-Statue of Liberty Ferry, Inc. be added to your mailing list so that we may be kept informed of progress.

Thank you.

Sincerely yours,

Joseph A. Moran
President

JAM:ms

7e. If ticket sales were relocated from the center of the interior of the roofed structure, a secure ticketing facility would be constructed elsewhere.

FRIENDS OF GRANT'S TOMB
THE CIVIL WAR ROUND TABLE OF
NEW YORK
STATEMENT BY THE "FRIENDS OF GRANT'S TOMB" ON THE SITE
SPECIFIC DRAFT FOR THE GENERAL GRANT NATIONAL MONUMENT

THE "FRIENDS OF GRANT'S TOMB" IS A COMMITTEE OF THE CIVIL WAR ROUND TABLE OF NEW YORK AND I WAS REQUESTED BY THE PRESIDENT OF THE CWRT-NY TO MONITOR THE ONGOING SITUATION COVERING THE RESTORATION OF GRANT'S TOMB. I ALSO REPRESENT MANY OTHER AMERICANS IN VARIOUS PARTS OF THE COUNTRY WHO ARE CONCERNED WITH THE CONDITION OF THE TOMB. BY A SERIES OF BULLETINS, I HAVE BEEN ENABLED TO KEEP THESE PERSONS INFORMED ON THE STEADY PROGRESS IN THE RECONDITIONING OF THE MONUMENT.

I AM MOST INTERESTED IN THE PLAN CONCEIVED UNDER THE SO-CALLED "PREFERRED" ALTERNATIVE 3 PLAN WHICH PROPOSES THE CONTINUATION OF THE LIFE, CAREER AND ACHIEVEMENTS OF GENERAL ULYSSES S. GRANT WHO FINALLY AND SUCCESSFULLY MANEUVERED THE ARMIES OF THE UNITED STATES TO A RESOUNDING VICTORY OVER THE CONFEDERATE FORCES IN THE WAR OF THE REBELLION. IT IS SUGGESTED, HOWEVER, THAT THE MOSAIC BENCHES BE REMOVED TO ANOTHER SECTION OF RIVERSIDE PARK FOR THEY IMPINGE OF THE INTEGRITY OF THE SOLEMN TOMB.

8a ALTHOUGH THE PLAN CALLS FOR THE ERECTION OF A VISITORS CENTER WEST OF RIVERSIDE DRIVE, IT IS BELIEVED THAT A STRUCTURE EAST OF THE DRIVE WOULD BENEFIT ALL CONCERNED SINCE THE PRESENCE OF AUTOMOBILE TRAFFIC WOULD BE A DETERRENT TO ANYONE PARTICULARLY THE DISABLED TO CROSSING THE DRIVE REGARDLESS OF A TRAFFIC SIGNAL PROPOSED AT THE SITE. RESTROOMS IS AN IMMEDIATE NECESSITY SINCE THEIR AVAILABILITY WOULD PERMIT VISITORS TO LENGTHEN THEIR VISIT.

THE LACK OF PARKING FOR VEHICLES AND BUSES SHOULD NOT INHIBIT VISITATION SINCE IT IS BELIEVED MANY VISITORS IN THE EARLY PART OF THE CENTURY CAME BY FOOT TO RENDER HOMAGE TO THE GREAT MILITARY FIGURE. URBANIZATION DID NOT COME TO THE AREA AROUND THE TOMB UNTIL THE PERIOD BETWEEN THE TWO WORLD WARS. IT SHOULD BE REMEMBERED THAT A "NO PARKING" SITUATION INHIBITS VISITATION TO OTHER STRUCTURES IN THE MANHATTAN SITES PROGRAM. CITY OFFICIALS SHOULD BE CONSULTED ABOUT PLACING SIGNS READING "GRANT NATIONAL MONUMENT" AT THE VARIOUS SUBWAY STATIONS

8a. Several options were considered for the location of the visitor center. As the original design intent for the tomb was a solitary structure with surrounding land that would command visual attention, the addition of a visitor center east of Riverside Drive next to the tomb would have an immediate impact on the view of the tomb and conflict with the original design intent. Traffic control would be implemented from the visitor center west of Riverside Drive. This visitor center would provide interpretive exhibits and activities as well as restrooms.

SERVING THE SITE. BUS LINES SHOULD HAVE SIMILAR SIGNING INSTALLED IN THE THEIR EQUIPMENT.

SINCE MOST VISITORS ARE OUT-OF-TOWNERS AND CERTAINLY NOT NEW YORKERS, IT WOULD BE WISE TO HAVE INFORMATION AND BROCHURES PROVIDED TO TRAVEL AGENCIES IN AND OUT OF THE CITY TO SUGGEST A VISIT TO GRANT'S TOMB. I REGULARLY SEND A GRANT'S TOMB NPS BROCHURE TO PERSONS WHO WRITE TO ME.

CONTINUED RESTORATION PLANS SHOULD BE A TOP PRIORITY OF THE PARK SERVICE. OUTSIDE FINANCIAL ASSISTANCE MAY BE REQUIRED TO INITIATE THE VISITORS CENTER PROJECT NO MATTER WHERE THE LOCATION IN THE PARK. ALSO PROMOTION OF THE PARK COULD BE AIDED BY HAVING THE VARIOUS OUTLETS IN THE EASTERN AND NATIONAL MONUMENTS ASSOCIATION PROVIDE BROCHURES AND INFORMATION ABOUT THE AVAILABILITY OF "GRANT'S TOMB" AS A MUST IN ONE'S VISIT TO NEW YORK CITY.

8b

FURTHER, MOST PARKS IN THE NATIONAL PARK SYSTEM HAVE SO-CALLED GROUPS DESIGNATED AS "FRIENDS" OF THIS PARK OR ANOTHER - SPECIFICALLY NAMING GETTYSBURG AND CHIC CHAT - WHICH HAVE BEEN FORMED TO ASSIST THE RESPECTIVE PARKS IN PROCURING LAND, ASSISTING PARK EMPLOYEES IN MANY ACTIVITIES, AND OTHER MEASURES TO MAINTAIN THE HIGH STANDARDS SET BY THE PARKS PARTICULARLY SINCE MONIES TO MAINTAIN AND DEVELOP THE PARKS ARE NOT ALWAYS AVAILABLE IN WASHINGTON DUE TO HEAVY BUDGETARY RESTRICTIONS.

8c

THE SERVICE IS ALSO PROPOSING TO RAISE THE NUMBER OF EMPLOYEES "ON SITE". PERHAPS ANOTHER ALTERNATIVE WOULD BE THE RECRUITMENT OF VOLUNTEERS TO AUGMENT THE RANKS OF PARK PERSONNEL. VOLUNTEERS ARE NOW PROVIDING ASSISTANCE IN MANY PARKS DOING JOBS THAT WOULD PERMIT REGULAR STAFF TO DEVOTE TO MORE NECESSARY MAINTENANCE.

THE "FRIENDS OF GRANT'S TOMB" OF THE CWRT-NY PLANS TO CONTINUE ITS EFFORTS TO ASSIST THE NATIONAL PARK SERVICE IN THE RESTRUCTURING OF THE GRANT NATIONAL MONUMENT.

GEORGE M. CRAIG

8b. The plan for Grant's tomb calls for a unified friends group established from interested individuals, organizations, and educational groups. This group would help maintain the quality of the site, supplement the interpretive program, and provide other support.

8c. The use of volunteers at the site has occurred for a number of years. This valuable program provides talented and committed individuals to improve the quality of the site. It is expected that this program will continue and that the numbers of volunteers will increase.

COMMENTS

GRANT MONUMENT ASSOCIATION
36 Carole Avenue
New Hyde Park, NY 11040-1964
(516) 328-8356

May 15, 1996

To: National Park Service

From: Frank Scaturro, Grant Monument Association

Re: General Management Plan for Grant's Tomb

President
Frank J. Scaturro

Vice-Presidents
Claire Ruestow Telocki
Gerald A. Regan

Secretary
Edward S. Hochstim

Treasurer
Edward S. Hochman

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Gerald A. Regan
Donald Martin Reynolds
Clara Frances Ruestow
Frank J. Scaturro
Claire Ruestow Telocki

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General Colin L. Powell (Ret.)
Jon Scruggs
General William C. Westmoreland (Ret.)

I have read the proposed alternatives for the future of Grant's Tomb and would like to offer the following comments on where I stand. My positions on the numerous issues facing the monument and their rationales have already been explored in previous documents of which you are already aware, so I don't want to be too redundant here. I still would like the other issues I previously raised that are not mentioned here to be resolved, but I'll devote this space only to reiterating my stands briefly on those issues specifically addressed in the GMP draft. For the sake of conciseness, I won't reiterate the full rationales for my positions, since they have already been put forward elsewhere. Our position on the monument itself aims largely toward the fulfillment of the original plans for Grant's Tomb in the 1890's, but with respect for later changes by the Grant Monument Association (GMA), such as most of the WPA projects in 1938, as long as those changes did not violate the clear original intentions for the monument.

9a

Interpretive themes: I was troubled by much of what I read in the GMP report regarding interpretation of Grant's career, largely because of several inaccuracies and an overall failure to appreciate some important themes. I am resubmitting with this memo an interpretive outline for Grant and Grant's Tomb, which I hope will be used as a basis for future interpretation, including the development of exhibits.

Actions common to all alternatives:

- I support the establishment of perpetual 24-hour guards at the monument.
- The GMA has been established as a "friends" organization to work with the NPS.
- Updated brochures and a site handbook are good ideas (especially the latter), though the brochures already were recently updated.
- The kiosk is acceptable as long as it is located well to the side of the monument and does not hinder the original landscaping intentions; it should contain more information, however, on Grant's importance in history for passers-by.

9b

- The area around the tomb should not be available for all recreational activities, but only for those that do not violate the proper atmosphere of a presidential tomb (see the section of my 1993 report on revising the Code of Federal Regulations)
- Maintenance facilities and procedures should be improved and regularly implemented, with ongoing periodic maintenance of interior finishes.

9c

- It is unclear exactly what the NPS has in mind in the proposal for chairlifts, ramps, and accessible doors. However this proposal is implemented, it is important that it does not involve any alteration of the building, i.e., that any adopted fixtures may be removed without the building's condition being changed from what it was before.

RESPONSES

9a. Previous recommendations of 1993 are noted.

9b. Riverside Park is a city-owned park and is a valuable recreational parkland for area residents. However, the National Park Service would not endorse activities and events that are considered inappropriate to the site.

9c. Federal regulations through the Architectural Barriers Act of 1968, the Rehabilitation Act of 1973, and the *Uniform Federal Accessibility Standards* of 1984 require that federal properties be accessible to all individuals. Current conditions at Grant's tomb do not meet these regulations. Although it is anticipated that little structural change would occur, actions to make Grant's tomb accessible would be completed with minimum damage to historic fabric. Careful design and choice of materials would avoid any unnecessary visual alteration to the structure.

COMMENTS

Comments on the alternatives: Alternative 1 is generally undesirable since it involves few changes. I did notice, however, that it is the only proposal that mentions installing a presidential flag. This idea is a good one and should be added to the desirable components of 2 and 3. Otherwise, I think that a combination of ideas from alternatives 2 and 3 would comprise the best of the GMP draft's possibilities, though both contain objectionable elements. Following are my stands on these two proposals:

9d

Alternative 2:

- There is no need to remove all 1938 WPA and other post-1897 GMA-supported improvements.
- Changes that have occurred since the NPS acquired the site in 1959 should be reversed, except for those supported by the GMA, such as the Cox murals.

9e

- If internal infrastructure changes not visually apparent are necessary to long-term preservation and building stability, they should not be barred.
- The solemnity of the tomb should be restored.
- The entry should be recreated with the double set of bronze doors and the wooden vestibule. The southwest staircase should be rehabilitated. The southeast corner office space should be removed and a matching southwest staircase rebuilt. (Office can be transferred to the visitor center.)

9f

- The amber glass and Tiffany frames need not be removed. The walls of the Fausett murals and the lunettes should not be painted white.
- The original use of the reliquary rooms should be reinstated by reconstructing the bronze flag cases and posting appropriate Grant-related artifacts (assuming original battle flags can no longer stand in there and remain preserved). Conditions such as interior security and the moisture-ventilation problem should first be resolved to insure the preservation and protection of these artifacts.

9g

- The bronze busts surrounding the sarcophagi should not be removed. Under my proposal, the Manship Grant equestrian statue would become redundant once there's a larger equestrian in the plaza, so that particular item might be transferred to the visitor center. However, I would still like to see a statue of Grant as president in its approximate location as a replacement.
- The sales and information desk should be removed, as should all interpretive exhibits, from the tomb.
- An allegorical statue representing Peace should be placed on the apex of the roof, just as Gen. Horace Porter told the crowd on April 27, 1897, and a Grant equestrian should be constructed in the plaza based upon Henry M. Shrady's Grant Memorial in front of the Capitol in Washington. Henry M. Shrady III has already provided written permission, and so notified the Director of the NPS, to copy his grandfather's statue for this purpose.
- The NPS should acquire sufficient interest in the area immediately surrounding the tomb as proposed.
- The trees planted in 1938 by the WPA should be removed as a violation of Duncan & Porter's strongly articulated intentions of having the tomb starkly situated on a treeless plane.
- The mosaic benches should be removed from their present location.

9h

- There is no need to remove the eagle statues or flagpoles.
- The NPS should work closely with the city on the articulated goals in alternative 2, though there will hopefully be restrooms on NPS property as part of the visitor center. Inconsistent activities should not be permitted at the tomb, as mentioned in my 1993 report, and my suggested standards for the tomb and plaza should be adopted.

RESPONSES

9d. The plan has been revised to include the installation of a presidential flag in all alternatives.

9e. The intention of alternative 2 is to return the tomb to the original design intent of John H. Duncan in 1897. This would require the removal of additions that have occurred since 1897. Although some of these additions are now considered historic, they do not represent the original design. The removal of these changes would, in some cases, be an adverse impact on the site. To carry out the intent of this alternative, items to be removed would not be random.

9f. See comment 9e.

9g. See comment 9e.

9h. See comment 9e.

COMMENTS

- Interpretation should occur through guided tours, interpretive talks, a site handbook, and a brochure to describe Grant's role in history. Most of this should focus around a separate visitor center rather than in the tomb itself.
- Essentially all interpretive displays, text, photos, and interactive videos should occur in a separate visitor center rather than in the tomb.
- The structure should be managed as a historic zone.

Alternative 3: Many issues under this alternative are already addressed above. Following are my stands on those issues that remain to be dealt with:

9i
- I do not necessarily object to the transformation of the overlook pavilion into a visitor center since a visitor center is necessary, but I wonder whether it might better occur with more space behind the tomb instead, as suggested in my 1993 report. If so, the overlook should be restored to serve its original purpose.
- The ellipse area should be transferred to the NPS as suggested.
- Structural and material deterioration should be corrected through rehabilitation efforts.
- The problem of the orange and cracking marble floor surrounding the sarcophagi needs to be resolved, and any replacement marble should be of the same kind and appearance.
- The viewing circle to the sarcophagi should not be adjusted, though this doesn't necessarily preclude the NPS developing some sort of mirror it could bring out on those rare occasions when there's a visitor in a wheelchair who cannot otherwise see the viewing circle.

9j
- A fence should not be added to the perimeter of the tomb site; guards are necessary and sufficient, and a fence would needlessly disrupt landscaping intentions.
- Necessary security lighting in the surrounding park is obviously not objectionable, though it should be constructed consistent with historical standards generally employed in the park.
- While the tomb structure should be managed as a historic zone, I think there should be hesitation to allow the interpretation of Grant's life in the visitor center to be subject to too much change over the years. Grant's reputation suffered through much of the 20th century and called for a revival after the Civil Rights Movement. I'd like to get it right the first time around and not let possible future aberrations compromise this.

9k
Alternatives considered but rejected: I agree on the rejection of the idea of an underground visitor center below the plaza in front of the tomb. I believe, however, that an at least partially aboveground visitor center behind the tomb (northeast of the temporary tomb site) should still be considered. I wonder whether more space would be available here than in the overlook area, and I do not see why there should be any need for an associated parking lot here any more than if the visitor center were at the overlook.

RESPONSES

9i. Several options were considered for the location of the visitor center. Because the original design intent for the tomb was a solitary structure with surrounding land that would command visual attention, the addition of a visitor center north of the tomb could have a visual impact on the tomb.

9j. Comment noted.

9k. See comment 9i.

[redacted]

August 5, 1996

Superintendent Joseph T. Avery
Manhattan Sites National Park Service
26 Wall Street
New York, NY 10005

Dear Mr. Avery,

As a member of the temporary task force that was set up to reflect on the interpretive theme of the historic site at St. Paul's in Eastchester, I would like to share my perceptions that I have sent to the town supervisor and town clerk. I will also send copies of this report to the people at Saint Paul's.

Yours truly,

Richard Forliano

Richard Forliano

COMMENTS

UPDATE ON THE CONTROVERSY OVER SAINT PAUL'S
AUGUST 6, 1996

Submitted by
Richard Forliano
Eastchester Town Historian

Since the eruption of the controversy over the interpretive theme of St. Paul's started in late May of 1996, I have been perplexed over how this situation evolved and what can be done to preserve the historical contributions of our town to our nation's heritage. I have found the numerous meetings, personal conversations, phone conferences, and research to be enlightening and beneficial. Presently I am guardedly optimistic about a successful resolution of the controversy but am also very unclear about the methods by which controversy can be resolved and the process through which Saint Paul's may resume its old historic place as the center of what today is the northern section of the Bronx and southern Westchester.

The new proposed interpretive theme for Saint Paul's is, "Diversity and Dissent: The American Spirit at work at Saint Paul's Church, East Chester." I am excited about this theme because it does not ignore the contribution of Eastchester to human rights and colonial freedom but this revised theme also includes other groups that have been left out of the mainstream of American history. In the month of July, four productive meetings have taken place at Saint Paul's church in which the interpretive staff at Saint Paul's, the NPS, Dr. Spruill, Dr. Pires-Hester, Professor Dunkak, and myself have had a fruitful dialogue over the future of the site. I would like to first comment on what I perceive to the positive aspects of that dialogue and conclude with some reservations that I presently have. Three documents that I will make special reference to are:

10a

Pires-Hester, Laura. *Preliminary Ethnographic Overview and Assessment, St. Paul's National Historic Site, Mount Vernon.* Submitted to National Park Service, May 29, 1996.

Spruill, Larry H. *St. Paul's Church and Historic Site: Taking Another Look.* Submitted to Superintendent Joseph Avery, Site Staff, and the National Parks Service Task Force, July 26, 1996.

RESPONSES

10a. Copies of the documents are available at park headquarters and at Saint Paul's Church National Historic Site.

Dunkak, Harry. "The 1733 Eastchester Election, the Zenger Trial, and Freedom of the Press" *The Westchester Historian. Quarterly of the Westchester Historical Society.* Vol. 64. Spring 1988.

POSITIVE ASPECTS OF THE DIALOGUE.

1. It is a pleasure working with the competent, professional, and dedicated people on the task force. We were all united around a desire to maintain the site at Saint Paul's as a center of historical interest and scholarship for the area.

2. The proposed theme, "Diversity and Dissent: The American Spirit at work at Saint Paul's Church, East Chester" originally thought of by Dr. Spruill is exciting. Not only does this theme acknowledge the contributions of our historic township to human rights and colonial freedom but it also broadens the mission of the site to rightfully include other groups that have been omitted from the story. The cometary and the burial records are an invaluable primary resource that can be used in uncovering how different groups over the centuries have used the American experience to adopt and change our region. (Pires-Hester, 1996)

3. I thoroughly concur with Larry Spruill's vision "to see Eastchester and its former jurisdictional components seize the opportunity to recreate for posterity the life and times of Old town Eastchester. The opportunity to establish an intercultural interpretative program for this *Jamestown-like experience* in Westchester County is a critical lifetime venture that I would not miss." (Spruill, 1996) By organizing the rich historical resources at Saint Paul's and in the area, programs making use of the old and new that ate adequately funded can make this site a center of regional and national interest.

4. While the NPS contends that Saint Paul's connection with Zenger and the emergence of freedom of the press is tenuous, St. Paul's connection with religious freedom and toleration has not been stressed enough. There is a consensus among historians that the site and area near the site have much to do with religious liberty. After some discussion it was agreed that Anne Hutchinson had become part of the tradition of St. Paul's. This courageous woman who stood up against the religious autocracy of the Puritans grounded her faith on a covenant of grace which placed the individual above the laws of state and

3

church. Rather than rejecting her faith Anne faced possible death and eventual banishment for her convictions. Anne met her demise in a spot near where the church would be erected two decades later. East Chester and the church was founded in 1664 by ten farm families from Fairfield an a year later the Eastchester covenant was written in which provisions for the religious life, the education of the young children, and the local government were made. When St. Paul's was taken over by the Anglican church in 1701, other religions were tolerated. The denial of the franchise to the Quakers in the "great election of 1733" led to legislation in the colonial assembly renouncing this practice.

It is important to acknowledge the contribution of Protestant Christianity to democracy and the American spirit. St. Paul's church can act as a prototype of how one of the first religious institutions helped people accommodate to changing conditions in a democratic land. A fascinating topic for future historical research that should draw the interest of religious institutions and correlates with the proposed interpretive theme would be how local religious institutions helped diverse groups adapt to the challenges in a democratic society. This topic would cover such fascinating areas like American revolution, the abolitionist movement, women's rights, immigration, labor movement, major wars, and civil rights.

5. Progress has been made resolving the controversy over Zenger. The unfortunate rhetoric of May of myth making, historical Disneylands, and fabrications have disappeared. This issue has become so laden with emotion that I would like to clarify my position and what I hear others saying at the end of this report.

RESERVATIONS.

1. As I previously noted, I am excited about the proposed theme. My concern that in an attempt to repress the terrible injustices against native Americans, blacks, women, and other groups, the contributions of long dead white citizens will be ignored. It is important that we do not fall pray to the same mistake as Father Weigle in reverse. It is important to correct honest mistakes that have been made in the depiction of the struggle for human rights but we have an historic duty to continue to tell the exciting story of that struggle as clearly and as accurately as we can.

4

10b

2. There is still a wide gap between the NPS and the historical and political community in Eastchester. Local officials were not informed about proposed changes in the interpretive themes. Laura Pires-Hester's ethnographic overview and assessment includes the Mount Vernon schools but does not include Eastchester. Eastchester was the first school district in the area in 1986 to include Saint Paul's in its district wide curriculum. Many school districts combine visits to St. Paul's with trips to the one room school house run by the Eastchester Historical Society less than a block from Mount Vernon High School. Yet this invaluable resource was not mentioned.

3. As Larry Spruill mentions in his paper, "the most ancient spirit of this community is congruent with the evolution and formation of the First Amendment and the Bill of Rights." The recent publicity has confused and angered the public. It is important that as we make every effort to move forward, we continue to settle differences over interpretation privately and reeducated the public with the historical mission of the site.

4. There are many intelligent, dedicated, and productive individuals in the Eastchester community who are perplexed and upset about the controversy. The rich records dating back to the seventeenth century were transcribed from the original documents by people like Harriet Bianchi. The Eastchester Historical Society which was started in the 1960's has a research library in addition to operating the one room school house. People from the Historical Society are faithful members of the consortium. They are entitled to an explanation of how this situation developed along with a clearer vision of where the site is going.

5. Attendance at the site has declined rapidly since 1991, the year of the bicentennial of the Bill of Rights. According to the draft of the general management plans for Manhattan site of the NPS in 1991 6,937 people visited the site. By 1994 only 4,152 people had come to St. Paul's. It is obvious that the connection with human rights during the bicentennial year drew people here. When and if the proposed theme is adopted, the site will have to be marketed and presented similar to the way that historic Hudson valley, Plymouth, or other historic restorations are presented.

10b. Input and comment from town and local historians, as well as other interested parties, was sought and considered. Current interpretive themes reflect this input, which will also be used to enhance and develop additional themes and interpretive and educational exhibits. The National Park Service will continue to seek the input of interested historians to enhance current and develop new interpretive themes.

08/09/1996 13:59 6673824 PAGE 02

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6. Last I will attempt to put the Zenger issue into a clearer perspective taking into consideration the information I have been presented in the last two months and my own judgment.

John Peter Zenger was a New York printer who imprisoned for the charge of seditious libel. He printed articles for Louis Morris among others who wrote these articles anonymously. In the first edition he printed an article about the corrupt election on the village green in 1733. This article was never burned and there is a dispute whether this article used as evidence in the indictment against Zenger. Zenger never set foot in Eastchester and the trial took place in Manhattan. The sign outside St. Paul's reading, "Village Green: Election of 1733 held here, caused the ZENGER TRIAL, Establishing Freedom of the Press" is an exaggeration. The actual trial and acquittal did not change libel laws in colonial times.

Now that the historic record has been put in the proper perspective, it is important that we do not trivialize what happened in Eastchester. The land owning farmers of Eastchester would not allow the corrupt royal governor to fix an election to the colonial assembly. The citizens of the town supported the political faction led by Lewis Morris. The printer who published the article was put on trial for printing other articles that exposed the corruption of the royal governor.

But the trial of John Peter Zenger did have an impact. Professor Harry Dunkak writes, "From the longer point of view, however, the Zenger case indicated for the very distant future a new spirit: that is, an American philosophy of democratic, pragmatic change. In the area of law this meant an abandonment the stagnant eighteenth century English common law and the acceptance of a living, vital, changing legal system that was responsive to the will of the people. The Zenger Affair thus pointed to a new and distant way of life, call it the American Spirit, that would be constantly evolving but responsive to the will of the people."

10c

The proposed theme is diversity and dissent, the American spirit. I do not see where the Zenger connection placed in the proper historical context is inappropriate for the site. Naturally Zenger should not dominate the site not because this event lacks

10c. Based on historical data and extensive research, it has been determined that the Zenger connection to the site should not be the major emphasis of the site's significance. Many historical events have occurred at the site that reflect the development of the nation and form the basis for the site's significance.

6

significance but because there is so much more to show and tell about Saint Paul's. Whatever caused this situation to blow up should be dropped. There is too much work and too many important tasks to accomplish.

COMMENTS

FREEDOM OF INFORMATION #40-
REQUEST #2 10030ABC

[redacted]

March 19 1996

Dear Director Kennedy,

Re: W3823

Your letter 3/13 did not refer to the content or questions of my January 30 letter.

You noted the Bill of Rights Museum in your first sentence, but then ignored it in your letter and enclosures.

The carriage house of the St. Paul's Church was designated as the National Shrine of the Bill of Rights Museum in 1983-84. There were displays about Anne Hutchinson, J.P. Zenger, the Electis of 1733, the Revolutionary War, and local battles.

The Bill of Rights Museum opened October 28, 1984

The Director has left Anne Hutchinson, J.P. Zenger and the Bill of Rights Museum out of the latest (12/95) booklets and brochures. WHY?

Please respond my letter. Sincerely,

Charles Roda

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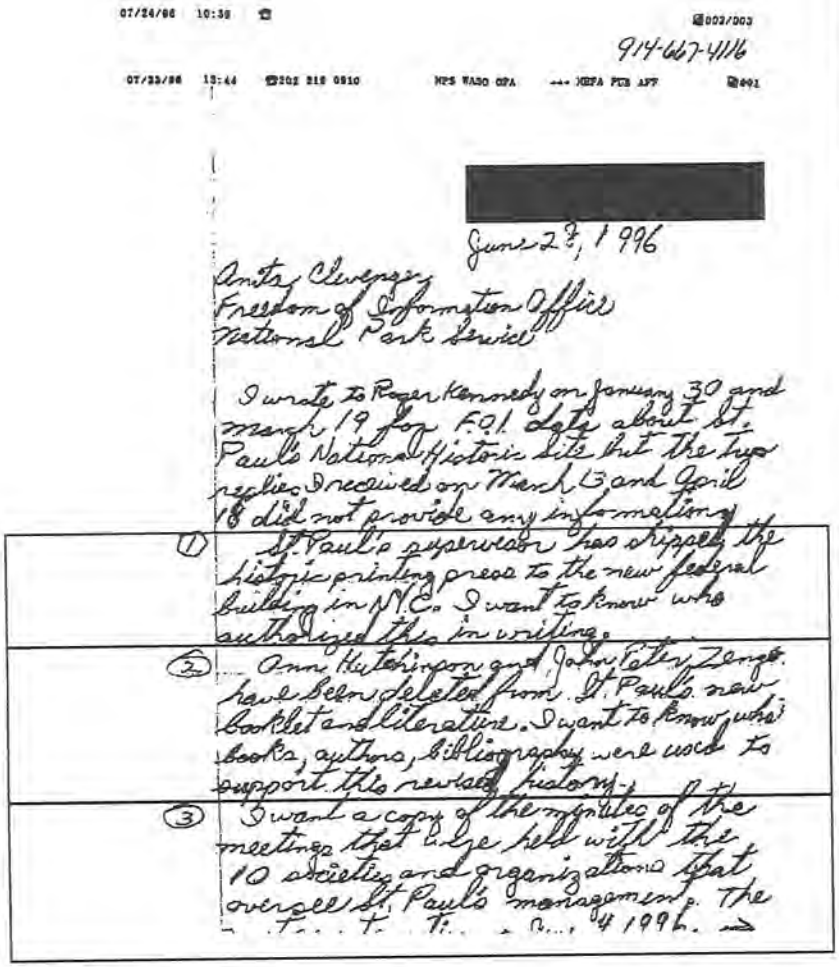
RESPONSES

11. A Freedom of Information act request from Charles Roda on March 19, 1996, was answered by NPS Chief Historian Dwight Pitcaithley. In his response letter dated April 11, 1996, Mr. Pitcaithley summarized an analysis of Zenger's association with the site and with the Bill of Rights. This analysis was done by Sharon Mills, the NPS interpreter at Saint Paul's Church, and was sent to Mr. Roda on January 24, 1996.

    The summary concluded that Zenger's association with the site and with the Bill of Rights was exaggerated during efforts to raise funds for the church's restoration in the 1930s. In addition, the construction of current structure was not begun until 1763, three decades after the election (which Zenger is associated with) on the adjacent village green. It is for these reasons that the National Park Service reevaluated and discontinued the primary interpretive emphasis on Zenger and the Bill of Rights at Saint Paul's Church.

    See also Richard Forliano's letter, immediately preceding this letter.

COMMENTS



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[redacted]

June 28, 1996

Anita Clevenger
Freedom of Information Office
National Park Service

I wrote to Roger Kennedy on January 30 and March 19 for F.O.I. data about St. Paul's National Historic Site but the two replies I received on March 13 and April 18 did not provide any information.

12a (1) St. Paul's supervisor has shipped the historic printing press to the new federal building in N.Y.C. I want to know who authorized this in writing.

12b (2) Ann Hutchinson and John Peter Zenger have been deleted from St. Paul's new booklet and literature. I want to know what books, authors, bibliography were used to support this revised history.

12c (3) I want a copy of the minutes of the meetings that were held with the 10 societies and organizations that oversee St. Paul's management. The [illegible] 4 1996. →

RESPONSES

The following responses are summarized from an official response by the park superintendent in a letter sent on August 6, 1996.

12a. Federal Hall National Memorial was the site of the trial of John Peter Zenger in 1735 and of the passage of the Bill of Rights in 1789. An exhibit featuring dioramas depicting Zenger's trial was presented to the National Park Service at Federal Hall in 1953, and a replica of an 18th century printing press was built for the National Park Service and installed at Federal Hall in 1973.

The superintendent of Manhattan Sites, which includes both Federal Hall and Saint Paul's Church, authorized the relocation of the Zenger exhibit to Saint Paul's Church in 1984. The current superintendent authorized the return of the exhibit to Federal Hall in 1994. This action was supported by the NPS chief historian (see previous letter).

12b. The January 24, 1996, response from the site interpreter explained the tenuous connection between the election held at Eastchester in 1733 and the Bill of Rights. The response of August 6, 1996, included sources of information and books.

12c. Notification of upcoming public meetings was sent on February 1, 1996, in a letter from the Saint Paul's site manager. The meetings were to be held after the release of the *Draft General Management Plan* to solicit public response and comment. The meeting that occurred on June 4, 1996, presented the draft document to the public. Information regarding this meeting is available at park headquarters (Federal Hall).

COMMENTS

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These actions were opposed by the Mt. Vernon and Eastchester Historic Societies, the Steuben Society and many other organizations but their opinions and research was totally ignored.

I believe the removal of the printing press, the refusal to provide F.O.I. information, and the refusal to accept the decisions of the authorized organizations involved, and the refusal to keep "minutes" of these public meetings are illegal.

I look forward to your reply.

Sincerely,

Charles Roda

RESPONSES

May 2, 1996

Dear Dr. Avery,

The ceremonies at Grants Tomb last weekend were very impressive and moving. I'm looking forward to April 27, 1997!

As a New Yorker and student of military history and the Civil War in particular, I wish to cast a vote for Alternative Plan #3 - The Continuum of Grant Memorialization. The idea of a visitor center with programs, videos, museum, gift shop and last, but not least, restrooms, is an excellent and long overdue concept. Not only would it attract more tourists and school classes to the Tomb, it would further honor a great American.

Also, New York City is the only great city in the world to lack a military history museum (I think of the Imperial War Museum in London, Les Invalides in Paris and the Vienna Military Museum to name but a few). This would also honor America's armed forces. Right now the great West Point Museum is the closest.

As to the need for more staff - I for one am eager to volunteer my services.

I may not be at the meeting on the 15th, but I'm wholeheartedly behind you in this effort. Good luck!

Sincerely, Yours, Robert Stangel (over)

13. No response necessary.

COMMENTS

RESPONSES

Comments on NPS General Management Plan (1996)

July 8, 1996

Proposals for the future of the National Historic Site at St. Pauls's Church, Eastchester (St. Paul's) can be considered along two different coordinates: (1) direction of interpretation, and (2) cost. A sutstantial change of interpretation will require capital cost, and perhaps also increased operating costs. An increased funding level can be utilized to enhance the current direction of interpretation, or to alter it.

Interpretation

Unlike most historic sites, which are associated with one event or person, St. Paul's is associated with two distinct, unrelated events which are important in our nation's history, and also has been a center for activities and for people whose differences with the governing authorities of church or state helped to define growth over a large area.

At one time the interpretation was focused on one of these events: the 1733 election which led to changes in New York laws and was at least one of the factors leading to Zenger's ongoing fight with the governor and state establishment, and eventually the famous trial.

Other local people and groups have focused on the Battle of Pelham connection: Gen. Howe's decision to wait at the area around the church, and use it for three days as a field hospital, was probably critical to enabling Washington's army to escape from New York City to White Plains.

St. Paul's position in the Town of Eastchester was important to local growth and development. Many of the people of Eastchester were dissenters from the governmental culture of the day, and used this site for gatherings; and the parish members were much at odds,

COMMENTS

for many years, with the governing authorities of the Church of England.

Current interpretation is evolving, but recognizes and uses all of these elements in the history of St. Paul's.

Cost

The Society which operates St. Paul's has long wished for funding adequate to improve protection and restoration of the Site. Its members would like to see something done to improve the unkempt appearance of the partly tumble-down wall provides a visitor's first impression.

The site has long been recognized as needing more and better parking.

Site workers and friends have long asked for the luxury of proper storage facilities for artifacts.

All of these take more money than Congress has been willing to appropriate, but can be improved one piece at a time as funds become available, without any upheaval in the way the site is operated or interpreted.

Conclusion

Rather than spend valuable time and effort trying to fix what isn't broken, I urge NPS to continue the present direction of the Site, making available sufficient resources so that the greatest physical defects can be corrected

David R. Treacy

David R. Treacy

[redacted]

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RESPONSES

14. The development of alternatives considers many elements, such as resource preservation and protection, visitor experience, impacts on resources, and cost. The development of a preferred alternative considers all of these elements and is not reflective of cost alone. Actions implementing the alternatives would be done in the most cost-effective manner that would still allow for the preservation and protection of resources.

Appendixes

APPENDIX A: BRIEF ADMINISTRATIVE HISTORY OF THE MANHATTAN SITES

The Manhattan Sites were formerly part of the New York Group, which was formed in the 1960s and included Statue of Liberty National Monument and Ellis Island, Fire Island National Seashore, Sagamore Hill National Historic Site, as well as the five of the six properties (Saint Paul's Church was not yet authorized as a national park system unit) of what is now known as the Manhattan Sites. Each of these properties had a site supervisor and a curatorial employee. The headquarters of this group was in various locations, as dictated by spacial needs and the preference of the superintendent.

During 1969-72 the New York Group evolved into the New York Park District by the addition of more sites — Edison National Historic Site, Morristown National Historical Park, and Gateway National Recreation Area in New Jersey and Fort Stanwix National Monument in New York. This new assembly was operated as a small district or "region" until 1974 when the NPS Northeast Regional Office was created. During this time (1969–74), in response to site needs, staff at each of the sites increased. For instance, curatorial staff was added to those sites where collections management was needed. Law enforcement officers for each site were also added for security. (Later, NPS law enforcement at the sites would be eradicated in favor of the New York City Police Department.)

In late 1974, the New York Park District was reorganized to the original properties that formed the New York Group (Edison, Morristown, Fort Stanwix, and Fire Island were removed). A study was then conducted on managing grouped properties, examining the positive and negative aspects as well as the financial benefits (for example, saving overhead funds by having one administrative office for the group). One motive for dissolving the group office was that individual units of these sizes would be ideal training grounds for new superintendents. It was at this time that the five sites became the unit of the Manhattan Sites. Also at that time, Gateway became its own park, managed by its own superintendent; the Statue of Liberty and Ellis Island also became one unit, as did Sagamore Hill. In 1978, Saint Paul's Church was authorized as a park unit and included within the Manhattan Sites, thus completing the group as it exists today. Manhattan Sites is currently administered by one superintendent, with site managers at each of the sites, except for the combined management of General Grant and Hamilton Grange national memorials.

6. Castle Clinton National Monument

		Page
Establishment and acceptance of title to lands authorized	Act of August 12, 1946	397
New York City National Shrines Advisory Board authorized	Act of August 11, 1955	397
Amendment to Act of August 11, 1955	Act of August 14, 1958	398

An Act To establish the Castle Clinton National Monument, in the city of New York, and for other purposes, approved August 12, 1946 (60 Stat. 997)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the Secretary of the Interior is authorized to accept, on behalf of the United States, title to the site, comprising approximately one acre and situated in Battery Park, New York City, of the historic structure known as Castle Clinton, together with such structure and any other improvement on or appurtenant to such site. When title to such property is vested in the United States, it shall constitute the Castle Clinton National Monument. (16 U.S.C. § 450cc.)

SEC. 2. The administration, protection, and development of the Castle Clinton National Monument shall be under the supervision of the Secretary of the Interior, subject to the provisions of the Act entitled "An Act to establish a National Park Service, and for other purposes", approved August 25, 1916, as amended. (16 U.S.C. § 450cc–1.)

39 Stat. 535. 5 U.S.C. § 485; 16 U.S.C. §§ 1, 2–4, 22, 43.

An Act To promote public cooperation in the rehabilitation and preservation of the Nation's important historic properties in the New York City area, and for other purposes, approved August 11, 1955 (69 Stat. 632)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the Secretary of the Interior is authorized to appoint an advisory board, to be known as the New York City National Shrines Advisory Board. The membership of the Board may not exceed eleven persons. The Secretary shall appoint one member to represent the city of New York, one member to represent the State of New York, and one member to represent the Borough of Manhattan, after consideration of such recommendations as may be made by the mayor of New York City, the Governor of New York State, and the President of the Borough of Manhattan for the appointment of the representatives of their respective jurisdictions. The remaining membership of the Board shall be appointed from the various historical and civic organizations interested in effectuating the purposes of this Act.

New York City National Shrines Advisory Board.

The Secretary shall, at the time of appointment, designate one of the members to serve as Chairman. Members of the Board shall receive no compensation for their services, but may be paid any necessary traveling and subsistence expenses incurred in the discharge of their duties, when authorized by the Secretary of the Interior.

Preservation of historic properties.

The functions of the Board shall be to render advice to the Secretary of the Interior and to further public participation in the rehabilitation and the preservation of those historic properties in the New York City area that are of great national significance, identified as the Federal Hall National Memorial, Castle Clinton National Monument, and the Statue of Liberty National Monument. The Board shall conduct a study of these historic properties and submit recommendations concerning their preservation and administration to the Secretary of the Interior, such report and recommendations of the Board to be transmitted to the Congress by the Secretary of the Interior, together with his recommendations thereon, within one year following the date of the establishment of the Board. The Board shall cease to exist when the Secretary of the Interior shall find that its purposes have been accomplished.

Report to Congress.

SEC. 2. The Secretary of the Interior is authorized to accept donations of funds for rehabilitation and preservation of the historic properties including any made upon condition that such funds are to be expended only if Federal funds in an amount equal to the donated funds are appropriated for such purposes. There are authorized to be appropriated such funds as may be necessary to match funds that may be donated for purposes of this Act.

Appropriation.

SEC. 3. The Federal Hall Memorial National Historic Site, established pursuant to the Historic Sites Act of August 21, 1935 (49 Stat. 666), shall hereafter be known as the "Federal Hall National Memorial". (16 U.S.C. § 463 note.)

16 U.S.C. 461–467.

An Act To amend the Act of August 11, 1955 (69 Stat. 632), relating to the rehabilitation and preservation of historic properties in the New York City area, and for other purposes, approved August 14, 1958 (72 Stat. 613)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the Act entitled "An Act to promote public cooperation in the rehabilitation and preservation of the Nation's important historic properties in the New York City area, and for other purposes," approved August 11, 1955 (69 Stat. 632), is hereby amended as follows:

New York City area. Historic properties.

16 U.S.C. 463 note.

(a) In the first sentence of the second paragraph of section 1 of such Act insert a comma and the word "development" after the word "rehabilitation."

(b) In the first sentence of section 2 of such Act insert a comma and the word "development" after the word "rehabilitation." (16 U.S.C. § 463 note. See p. 398.)

4. Federal Hall National Memorial

		Page
New York City National Shrines Advisory Board authorized	Act of August 11, 1955	375
Amendment to Act of August 11, 1955	Act of August 14, 1958	376

An Act To promote public cooperation in the rehabilitation and preservation of the Nation's important historic properties in the New York City area, and for other purposes, approved August 11, 1955 (69 Stat. 632)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the Secretary of the Interior is authorized to appoint an advisory board, to be known as the New York City National Shrines Advisory Board. The membership of the Board may not exceed eleven persons. The Secretary shall appoint one member to represent the city of New York, one member to represent the State of New York, and one member to represent the Borough of Manhattan, after consideration of such recommendations as may be made by the mayor of New York City, the Governor of New York State, and the President of the Borough of Manhattan for the appointment of the representatives of their respective jurisdictions. The remaining membership of the Board shall be appointed from the various historical and civic organizations interested in effectuating the purposes of this Act. The Secretary shall, at the time of appointment, designate one of the members to serve as Chairman. Members of the Board shall receive no compensation for their services, but may be paid any necessary traveling and subsistence expenses incurred in the discharge of their duties, when authorized by the Secretary of the Interior.

New York City National Shrines Advisory Board.

The functions of the Board shall be to render advice to the Secretary of the Interior and to further public participation in the rehabilitation and the preservation of those historic properties in the New York City area that are of great national significance, identified as the Federal Hall National Memorial, Castle Clinton National Monument, and the Statue of Liberty National Monument. The Board shall conduct a study of these historic properties and submit recommendations concerning their preservation and administration to the Secretary of the Interior, such report and recommendations of the Board to be transmitted to the Congress by the Secretary of the Interior, together with his recommendations thereon, within one year following the date of the establishment of the Board. The Board shall cease to exist when the Secretary of the Interior shall find that its purposes have been accomplished.

Preservation of historic properties.

Report to Congress.

Appropriation.

SEC. 2. The Secretary of the Interior is authorized to accept donations of funds for rehabilitation and preservation of the historic properties including any made upon condition that such funds are to be expended only if Federal funds in an amount equal to the donated funds are appropriated for such purposes. There are authorized to be appropriated such funds as may be necessary to match funds that may be donated for purposes of this Act.

16 U.S.C. 461–467.

SEC. 3. The Federal Hall Memorial National Historic Site, established pursuant to the Historic Sites Act of August 21, 1935 (49 Stat. 666), shall hereafter be known as the "Federal Hall National Memorial". (16 U.S.C. § 463 note, as amended.)

An Act To amend the Act of August 11, 1955 (69 Stat. 632), relating to the rehabilitation and preservation of historic properties in the New York City area, and for other purposes, approved August 14, 1958 (72 Stat. 613)

New York City area. Historic properties.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the Act entitled "An Act to promote public cooperation in the rehabilitation and preservation of the Nation's important historic properties in the New York City area, and for other purposes," approved August 11, 1955 (69 Stat. 632), is hereby amended as follows:

16 U.S.C. 463 note.

(a) In the first sentence of the second paragraph of section 1 of such Act insert a comma and the word "development" after the word "rehabilitation."

(b) In the first sentence of section 2 of such Act insert a comma and the word "development" after the word "rehabilitation." (16 U.S.C. § 463 note.)

7. General Grant National Memorial

	Page
Secretary of the Interior authorized to accept title to Grant's Tomb and maintain it as the General Grant National Memorial----------Act of August 14, 1958	381

An Act To provide that the Secretary of the Interior shall accept title to Grant's Tomb in New York, New York, and maintain it as the General Grant National Memorial, approved August 14, 1958 (72 Stat. 614)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the Secretary of the Interior is authorized and directed to accept, as a gift to the United States, title to the real property known as Grant's Tomb at Riverside Drive and West One Hundred and Twenty-Second Street in New York, New York, and thereafter to administer and maintain such real property as the General Grant National Memorial. (16 U.S.C. § 450nn.)

General Grant National Memorial.

13. St. Paul's Church, Eastchester

An Act to authorize additional appropriations for the acquisition of lands and interests in lands within the Sawtooth National Recreation Area in Idaho. (92 Stat. 3467) (P.L. 95-625)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

TITLE V—ESTABLISHMENT OF NEW AREAS AND ADDITIONS TO NATIONAL TRAILS SYSTEM

SUBTITLE A—PARKS, SEASHORES, ETC.

* * * * * * *

SAINT PAUL'S CHURCH, EASTCHESTER

SEC. 504. (a) In order to preserve and protect Saint Paul's Church, Eastchester, in Mount Vernon, New York, for the benefit of present and future generations, the Secretary may accept any gift or bequest of any property or structure which comprises such church and any other real or personal property located within the square bounded by South Columbus Avenue, South Third Avenue, Edison Avenue, and South Fulton Avenue, in Mount Vernon, New York, including the cemetery located within such square and any real property located within such square which was at any time a part of the old village green, now in Mount Vernon, New York.

(b) Any property acquired under subsection (a) shall be administered by the Secretary acting through the National Park Service, in accordance with this section and provisions of law generally applicable to units of the National Park System, including the Act approved August 25, 1916 (16 U.S.C. 1 and following) and the Act approved August 21, 1935. The Secretary, in carrying out the provisions of such Acts (i) shall give particular attention to assuring the completion of such structural and other repairs as he considers necessary to restore and preserve any property acquired in accordance with this section, and (ii) may enter into cooperative agreements with other public or private entities for the management, protection, development, and interpretation, in whole or in part, of the property so acquired.

* * * * * * *

Approved November 10, 1978.

15. Theodore Roosevelt Birthplace National Historic Site

		Page
Establishment authorized	Act of July 25, 1962	365

An Act To authorize establishment of the Theodore Roosevelt Birthplace and Sagamore Hill National Historic Sites, New York, and for other purposes, approved July 25, 1962 (76 Stat. 217)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That, in order to preserve in public ownership historically significant properties associated with the life of Theodore Roosevelt, the Secretary of the Interior may acquire, by donation from the Theodore Roosevelt Association, the sites and structures known as the Theodore Roosevelt House situated at Twenty-eight and Twenty-six East Twentieth Street, New York City, consisting of approximately eleven one-hundredths of an acre, and Sagamore Hill, consisting of not to exceed ninety acres at Cove Neck, Oyster Bay, Long Island, and the improvements thereon, together with the furnishings and other contents of the structures.

Theodore Roosevelt Birthplace and Sagamore Hill National Historic Sites, N.Y. Establishment authorization.

SEC. 2. (a) In accordance with the Act entitled "An Act to create a National Park Trust Fund Board, and for other purposes," approved July 10, 1935 (49 Stat. 477), as amended, the National Park Trust Fund Board may accept from the Theodore Roosevelt Association $500,000 and such additional amounts as the association may tender from time to time from the endowment fund under its control, which funds, when accepted, shall be utilized only for the purposes of the historic sites established pursuant to this Act.

Acceptance of funds.

16 U.S.C. 19–19c.

(b) Nothing in this Act shall limit the authority of the Secretary of the Interior under other provisions of law to accept in the name of the United States donations of property.

SEC. 3. When lands, interests in lands, improvements, and other properties comprising the Theodore Roosevelt Birthplace and Sagamore Hill, as authorized for acquisition by section 1 of this Act, and a portion of the endowment fund in the amount of $500,000 have been transferred to the United States, the Secretary of the Interior shall establish the Theodore Roosevelt Birthplace and Sagamore Hill National Historic Sites by publication of notice thereof in the Federal Register.

Transfer of property, etc. to U.S.

Publication in F.R.

SEC. 4. The Secretary of the Interior shall administer, protect, and develop the Theodore Roosevelt Birthplace and Sagamore Hill National Historic Sites in accord-

Development, etc.

365

ance with the provisions of the Act of August 25, 1916 (39 Stat. 535; 16 U.S.C. 1 and the following), as amended and supplemented.

Advisory committees. Establishment.

SEC. 5. The Theodore Roosevelt Association, having by its patriotic and active interest preserved for posterity these important historic sites, buildings, and objects, shall, upon establishment of the Theodore Roosevelt Birthplace and Sagamore Hill National Historic Sites be consulted by the Secretary of the Interior in the establishment of an advisory committee or committees for matters relating to the preservation, development, and management of the Theodore Roosevelt Birthplace and Sagamore Hill National Historic Sites.

SEC. 6. The Act entitled "An Act to incorporate the Roosevelt Memorial Association," approved May 31, 1920 (41 Stat. 691), as amended by the Act approved on May 21, 1953 (67 Stat. 27), which changed the name of such corporation to the Theodore Roosevelt Association, and by the Act approved on March 29, 1956 (70 Stat. 60), which permitted such corporation to consolidate with Women's Theodore Roosevelt Association, Incorporated, is hereby further amended by adding to section 3 thereof a new subdivision as follows:

Donation of property.

"(4) The donation of real and personal property, including part or all of its endowment fund, to a public agency or public agencies for the purpose of preserving in public ownership historically significant properties associated with the life of Theodore Roosevelt."

and by deleting the word "and" at the end of subdivision (2) of section 3.

APPENDIX C: DEVELOPMENT AND INTERPRETIVE ESTIMATED COSTS

The following costs are estimates to aid in comparing the alternatives presented and not for budgetary purposes.

TABLE C-1. COSTS FOR CASTLE CLINTON

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1	786,000	150,000	936,000
Alternative 2	1,294,000	247,000	1,541,000
Alternative 2A (includes new ticketing facility)	1,704,053	325,000	2,029,000
Alternative 3	13,926,000	2,658,000	16,584,00
Alternative 3A includes new ticketing facility)	14,336,000	2,736,000	17,072,000

TABLE C-2. COSTS FOR FEDERAL HALL

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1	104,000	20,000	124,000
Alternative 2	1,790,000	335,000	2,125,000
Alternative 3	5,933,000	1,132,000	7,065,000

TABLE C-3. COSTS FOR GENERAL GRANT'S TOMB

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1		1,000	224,000
Alternative 2		233,000	3,657,000
Alternative 3		360,000	4,246,000

TABLE C-4. COSTS FOR SAINT PAUL'S CHURCH

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1	432,000	82,000	514,000
Alternative 2	1,828,000	349,000	2,176,000

TABLE C-5. COSTS FOR THEODORE ROOSEVELT BIRTHPLACE

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1	20,000	4,000	24,000
Alternative 2	758,000	145,000	903,000
Alternative 3	2,478,000	473,000	2,951,000

TABLE C-6. INTERPRETIVE COSTS FOR CASTLE CLINTON

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1	112,000	2,000	114,000
Alternative 2	349,000	62,000	411,000
Alternative 2A (building new ticketing facility)	349,000	62,000	411,000
Alternative 3	1,276,000	225,000	1,501,000

TABLE C-7. INTERPRETIVE COSTS FOR FEDERAL HALL

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1	529,000	2,000	531,000
Alternative 2	2,421,000	447,000	2,868,000
Alternative 3	4,310,000	810,000	5,120,000

TABLE C-8. INTERPRETIVE COSTS FOR GENERAL GRANT'S TOMB

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1	283,000	3,000	286,000
Alternative 2	201,000	26,000	226,000
Alternative 3	787,000	122,000	909,000

TABLE C-9. INTERPRETIVE COSTS FOR SAINT PAUL'S CHURCH

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1	40,000	7,000	47,000
Alternative 2	691,000	137,000	828,000

TABLE C-10. INTERPRETIVE COSTS FOR THEODORE ROOSEVELT BIRTHPLACE

	Gross Construction Costs	Construction Planning	Total Project Costs
Alternative 1	238,000	2,000	240,000
Alternative 2	322,000	16,000	338,000
Alternative 3	422,000	36,000	458,000

NOTE: Estimated costs are rounded to the nearest thousand dollars.