

# CONTEXT MAP

## WEIR FARM NATIONAL HISTORIC SITE

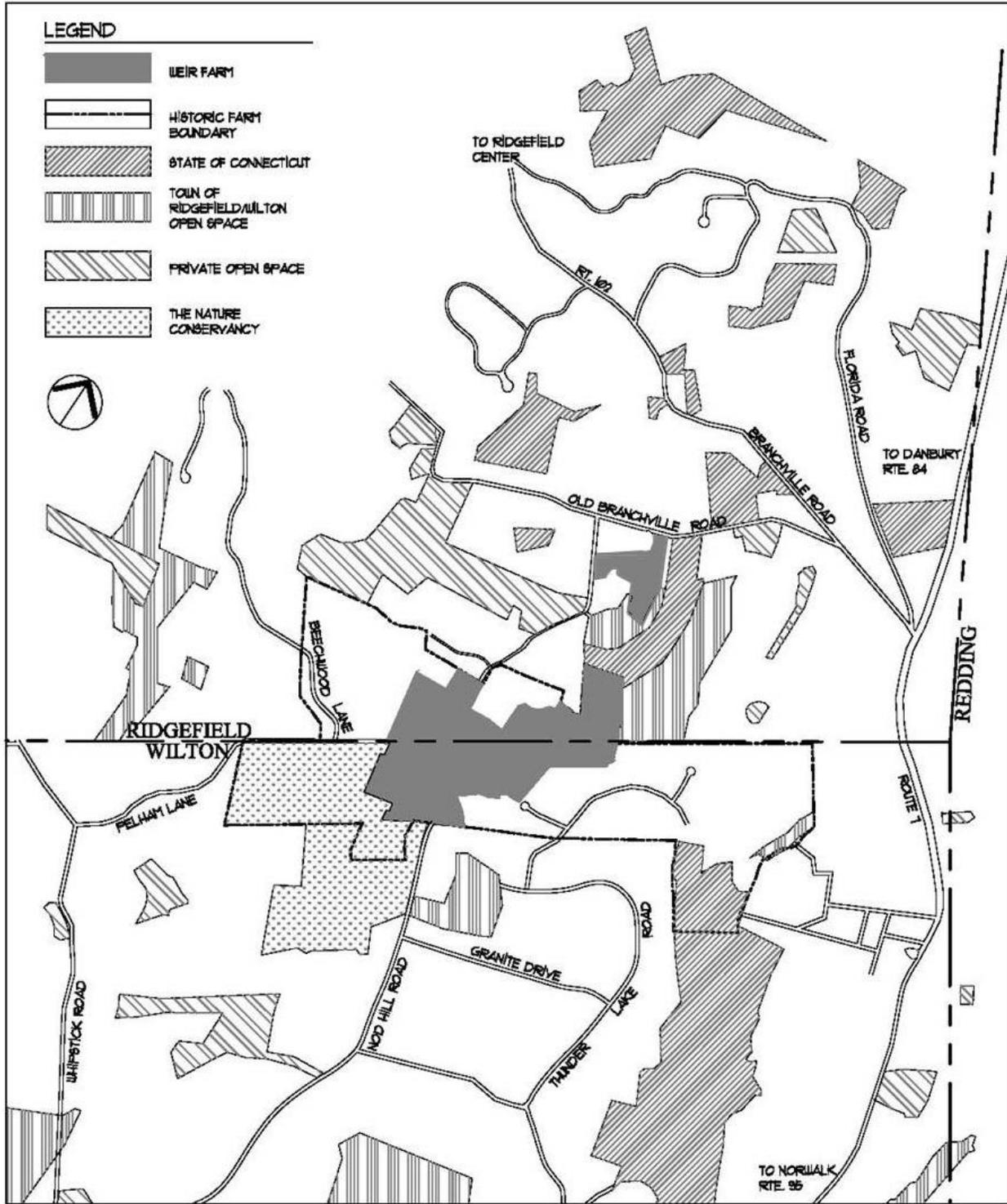


Figure 1-5. Weir Farm National Historic Site Context Map

## 1.5 Project Background, Value Analysis, and Scoping

### 1.5.1 Project Background

In the Final GMP/EIS, the NPS identified its preferred management alternative: “to focus on reuniting the historic property, as it appeared when it inspired the art created by Weir.” This planning included acquiring adjacent properties for administration and maintenance facilities. In order to harmonize this site with the original farm, the GMP outlined that new structures should retain the red barn appearance of the Historic Core. Originally, this alternative also included locating a curatorial facility in a renovated structure adjacent to, or near, the site.

On November 10, 1998, Congress amended the Weir Farm National Historic Site Establishment Act of 1990 (Public Law 105-363, 112 stat. 3296) to authorize the acquisition of additional acreage for the historic site to permit the development of administrative facilities. Subsequently, the U.S. Department of the Interior appropriated \$2 million in additional funding to purchase property. The NPS purchased two parcels of land totaling 9 acres. In order to retain the Farm’s peaceful environment and to keep the historic landscape free of modern intrusion, the NPS acquired the parcels in Fairfield County, Connecticut, in an area located within one-half of a mile of the Park’s Historic Core (NPS, 1995).

### 1.5.2 Value Analysis

NPS DO #90, *Value Analysis*, established the value analysis program to analyze the functions of facilities, processes, systems, equipment, services, and supplies for the purpose of achieving essential functions at the lowest life-cycle cost consistent with required performance, reliability, quality, safety, and achievement of NPS mission priorities, such as resource protection, sustainability, and quality visitor experience (NPS, 2002a).

An interdisciplinary project team (IDT) conducted a value analysis workshop to identify the Preferred Alternative to meet the purpose and need outlined in Section 1.1, *Purpose and Need of the Proposed Action*. During the workshop, the Park developed several design and layout alternatives for the proposed support facilities. Each alternative was ranked based on how well it met the following evaluation factors:

1. Protects Park resources (collections and Historic Core areas);
2. Protects employee health and safety;
3. Improves operational efficiency and sustainability;
4. Improves visitor experience and improves visitor health, safety, and welfare; and
5. Provides other advantages to the NPS.

The alternative that received the highest overall value rating was identified as the Preferred Alternative. Details of the Preferred Alternative and alternatives dismissed from further analysis are discussed in Chapter 2, *Alternatives*.

### ***1.5.3 Scoping***

The EA process under NEPA requires agencies to seek outside suggestions and other input about what should be considered in the EA. This process, called “scoping,” involved contacting other Federal, State, and local agencies that might have an interest in the proposed action. The NPS contacted neighboring residents and encouraged them to comment on the proposed action. Additionally, NPS met with the Town of Ridgefield Planning and Zoning Commission to hear their concerns on the project. A list of persons contacted, including copies of the scoping letters, is located in Appendix D.

An IDT of environmental professionals preparing the EA/Assessment of Effect also conducted an internal scoping effort. This team sought to identify the full spectrum of types of effects that could be expected from each component of the proposed action. The team also completed an environmental screening form to determine the potential for measurable impacts to the human environment.

## **1.6 Issues and Impact Topics**

### ***1.6.1 Issues***

Issues and concerns affecting this proposal were identified from past NPS planning efforts and input from the IDT and State and Federal agencies. Issues identified include: lack of climate controlled and secure museum storage; lack of adequate administrative space; meeting project needs with the smallest amount of impact to the environment; and degradation of visual quality of the site from construction activities.

### ***1.6.2 Derivation of Impact Topics***

Specific impact topics were developed for discussion focus, and to allow comparison of the environmental consequences of each alternative. These impact topics were identified based on Federal laws, regulations, and Executive Orders; NPS *2001 Management Policies* (NPS, 2000a); internal and external scoping; and NPS knowledge of limited or easily impacted resources. A brief rationale for the selection of each impact topic is given below, as well as the rationale for dismissing specific topics from further consideration.

### ***1.6.3 Impacts Topics Included in this Document***

#### **Natural Resources**

Soils, Geology, and Topography: During construction, there is the potential for increased soil erosion at the project site. Construction activities, such as blasting, excavation, and grading, would disturb soils and geology, and construction equipment and vehicles have the potential to cause soil compaction.

## Cultural Resources

Consideration of cultural resource impacts is required under the NHPA, NEPA, the 1916 NPS Organic Act, and NPS *2001 Management Policies* (NPS, 2000a).

Historic Structures: A historic structure is a constructed work, usually immovable by nature or design, consciously created to serve some human activity (NPS DO #28, *Cultural Resources Management Guideline*, 1998). Weir Farm was listed as a historic district on the National Register of Historic Places (NRHP) in 1984, and was established as a National Historic Site in October 1990 (P.L. 101-485, 104 Stat. 1171). There are no significant historic structures on the proposed support facility site; however, relocating the administrative offices and maintenance storage away from the Historic Core will decrease wear and tear on the Burlingham House and surrounding buildings. Because historic structures are present within the area of potential effect for this undertaking, historic structures are included in this EA/Assessment of Effect.

Cultural Landscapes: A cultural landscape is a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person exhibiting other cultural or aesthetic values. There are four kinds of cultural landscape, not mutually exclusive: historic site, historic designated landscape, historic vernacular landscape, and ethnographic landscape (NPS DO #28, *Cultural Resources Management Guideline*, 1998). A cultural landscape report for Weir Farm NHS was completed in 1997, and a Level I Cultural Landscapes Inventory was completed in 2003, which included both the Historic Core and the Westervelt-DiNapoli-Lecher property. The construction and operation of support facilities at Weir Farm has the potential to alter the cultural landscape and affect the preservation of the historic landscape of the Historic Core.

Museum Collections: A museum collection is an assemblage of objects, works of art, historic documents, and/or natural history specimens collected according to a rational scheme and maintained so they can be preserved, studied, and interpreted for public benefit (NPS DO #28, *Cultural Resources Management Guideline*, 1998). Construction of the curatorial facility has the potential to affect the preservation of the Park's museum collections.

## Socioeconomic Environment

Gateway Communities: Construction activities and equipment use under the Preferred Alternative have the potential to affect noise levels, traffic patterns, and visual quality, all of which have the potential to affect nearby residents. In addition, the proposed project has the potential to physically alter the community setting.

Transportation and Traffic: Construction activities, as well as the transport of equipment and workers, have the potential to affect traffic volumes and congestion, and subsequently, increase the risk of vehicular accidents along affected routes. These activities also have the potential to damage affected roads.

Noise: Construction activities and equipment use under the Preferred Alternative would produce noise, which has the potential to affect nearby residents, NPS staff, and wildlife.

Visual Resources: Construction activities under the Preferred Alternative have the potential to affect the visual quality of the surrounding area due to the presence of equipment, workers, and the construction site itself, and from vegetation removal.

## Visitor Use and Experience

The new support facilities have the potential to affect visitor use and experience at the Historic Core by removing potentially hazardous maintenance equipment, and by freeing the Burlingham House for other future mission-based uses, such as the Artists in Residence Program.

## Park Operations and Maintenance

The new support facilities have the potential to affect Park operations and maintenance practices.

### *1.6.4 Impact Topics Dismissed from Further Analysis*

NEPA regulations emphasize the importance of adjusting the scope of each EA to the particulars of the project and its setting, and focusing on the specific potential impacts of that project. There is no need, according to the regulations, to include information on resources that would not be affected by the project. As a result, different EAs will discuss somewhat different lists of resources. Several resources that are frequently discussed in other NPS NEPA documents are not discussed in this one because the resource is not present at Weir Farm. These resources include:

## Natural Resources

Water Resources and Water Quality: There are no streams, ponds, or lakes located on the proposed support facilities site. Due to the steep topography of the site, and the net increase in impervious surfaces, there is a potential for increased surface water runoff from the site during construction, as well as over the long-term. The Park would develop a Stormwater Management Plan and Soil Erosion and Sediment Control Plan to control overland flow and reduce the potential for sedimentation from the project site. With these mitigations in place, impacts to water resources and water quality would be negligible. Therefore this topic has been dismissed from further analysis.

Floodplains: Executive Order 11988, *Floodplain Management*, requires all Federal agencies to take action to reduce the risk of flood loss, to restore and preserve the natural and beneficial values served by floodplains, and to minimize the impact of floods on human safety, health, and welfare. The proposed project location is neither within a 100-year flood hazard area nor a 500-year flood hazard area (FEMA, 1998). Therefore, this topic was dismissed from further analysis.

Wetlands: Wetlands are considered “waters of the United States” and are, therefore, subject to regulation under Section 404 of the Clean Water Act (CWA). In addition, Executive Order

11990, *Protection of Wetlands*, directs the NPS to avoid, to the extent possible, the long- and short-term adverse impacts associated with modifying or occupying wetlands, and requires Federal agencies to follow avoidance, mitigation, and preservation procedures regarding wetlands with public input before proposing new construction projects. The NPS has a no net loss of wetlands policy. The National Wetland Inventory (NWI) identifies one palustrine forested wetland approximately 50 feet southeast of the proposed maintenance/curatorial facility. The Town of Ridgefield Inland Wetlands Board was consulted on the potential impacts to the wetland and determined that, with proposed stormwater and erosion controls in place as outlined in the project's *Stormwater Management Plan* and *Soil Erosion and Sediment Control Plan*, there would be no impact to wetlands from the implementation of the Preferred Alternative (Brosis, 2004). The project would not take place within a wetland or a wetland buffer area, and no permit would be required for the Preferred Alternative. Therefore, this topic has been dismissed from further analysis.

Air Quality: The Clean Air Act (CAA) and NPS *2001 Management Policies* (NPS, 2000a) require consideration of air quality impacts from NPS projects. Since Fairfield County, the location of the proposed action, is currently classified by the USEPA as being in severe non-attainment for ozone (USEPA, 2004; CDEQ, 2004), a general conformity analysis was conducted for this project to estimate the amount of emissions that would occur during construction. This analysis is presented in Appendix E. The results of this analysis indicate that construction under the Preferred Alternative would result in short-term, negligible, adverse impacts on air quality. Long-term impacts on air quality are anticipated to be beneficial, but negligible. Therefore, this impact topic was dismissed from further analysis in this EA/Assessment of Effect.

Prime Farmland: Prime farmland is one important kind of farmland defined by the U.S. Department of Agriculture, the importance of which lies in its ability to help meet the short- and long-term food and fiber needs of the nation. Prime farmland can be cultivated land, pasture land, forest land, or other land, but cannot be urban or built-up land (any contiguous unit of land 10 acres or more in size that is used for such purposes as housing, industrial, and commercial sites, institutions, buildings, landfills, sewage treatment plans, etc.) or water areas. The project area contains shallow soils that are not considered prime farmland; therefore, this topic was dismissed from further consideration in this EA/Assessment of Effect.

Vegetation and Wildlife: Construction activities would have short-term, negligible to minor, localized, adverse impacts on vegetation and wildlife. The project area is currently primarily vegetated with maple trees, with some oak, hickory, and beech intermixed. This vegetation is secondary growth, occurring in the last approximately 50 years, and there is little to no understory vegetation (Mair and Ives, 2003). The removal of a small amount of second growth vegetation, including some trees, would result in a negligible to minor loss in the amount of wildlife habitat in the project area. However, the many acres of suitable wildlife habitat available surrounding the project site would remain unaffected by construction activities. Terrestrial wildlife within and adjacent to the project area would be affected only temporarily during the construction period from the presence of workers, equipment, and noise associated with equipment at the project site. No long-term impacts on these resources are anticipated to

occur. Therefore, this impact topic was dismissed from further analysis in this EA/Assessment of Effect.

Executive Order 13112, *Invasive Species*, requires Federal agencies to prevent new invasive introductions; detect, monitor, and rapidly respond to/control current infestations in a cost-effective and environmentally sound manner; and educate the public about invasive impacts and control methods. This executive order also prohibits Federal agencies from authorizing, funding, or carrying out actions that they believe are likely to cause or promote the introduction or spread of invasive species. Implementation of the Preferred Alternative is not anticipated to result in any new introductions of invasive species into the Park. The NPS would require the construction contractor to powerwash all construction vehicles and equipment prior to their initial arrival at the Park to remove seed and plant material in an effort to avoid the introduction of any invasive exotic vegetation. Any invasive species found on the site would be managed in accordance with the Park's *Invasive Plant Management Program* (NPS, 2002b).

Threatened, Endangered, Candidate Species, and Species of Concern: The NPS initiated informal consultation with the U.S. Fish and Wildlife Service (USFWS) in accordance with Section 7 of the Endangered Species Act (ESA) in a letter dated December 22, 2003 (see Figure D-3 in Appendix D). According to a response letter from the USFWS dated January 9, 2004 (see Figure D-4), no federally listed or proposed threatened or endangered species are known to occur in the project areas. Preparation of a Biological Assessment or further consultation with the USFWS under Section 7 of the ESA is not required.

According to a Level I Flora Inventory carried out by the Brooklyn Botanic Garden in 1998, five species of State special concern may be found at Weir Farm. The species of special concern are: two-flowered krigia (*Krigia biflora*), hornwort (*Ceratophyllum echinatum*), gypsywort (*Lycopus rubellus*), black snakeroot (*Sanicula canadensis*), and black-haw (*Viburnum prunifolium*). None of these species are known to inhabit the project area or its general vicinity. No other State-listed rare, threatened, endangered, or candidate species are located on site (NPS, 2004). Therefore, this topic was dismissed from further analysis.

## Cultural Resources

Archeological Resources: Archeological resources are the remains of past human activity and records documenting the scientific analysis of the remains (NPS DO #28, *Cultural Resources Management Guideline*, 1998). The front portion of the newly acquired Westervelt-DiNapoli-Lecher property has been disturbed/reworked (graded) and landscaped around the extant Westervelt House. Behind the house to the south, the slope has been cut away to create a backyard living space. There would be no potential to affect archeological resources around or behind the Westervelt House due to the already disturbed nature of the site.

According to the *Reconnaissance Archeological Survey for the Proposed Maintenance and Curatorial Facility* (Mair and Ives, 2003) conducted on the project site, no archeological sites were identified within the area of potential effect for this proposal, and none would be impacted by the construction of the proposed maintenance/curatorial facility. Evidence of historic period activities in the project area consists of the remnants of a fieldstone wall system in varying states

of integrity, several piles of fieldstone, and several locations of boulder quarrying. None of these indicators of past human activity within the project area are considered significant resources, and no further archeological investigations are warranted (Mair and Ives, 2003). The NPS reconnaissance archeological survey was sent to the Connecticut State Historic Preservation Officer (SHPO) in March 2004, and the NPS has received concurrence from the SHPO on a finding of no impact. This concurrence letter is provided as **Figure D-6** in Appendix D of this EA. Since no archeological resources were identified within the area of potential effect and none would be impacted by the project, archeological resources were dismissed from further analysis in this EA/Assessment of Effect.

Ethnographic Resources: According to NPS-28, *Cultural Resource Management Guideline*, an ethnographic resource is any “site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it” (NPS, 1998, p.181). No recorded Native American sites are located within the project area. Although a large Native American quarry site has been reported to the south near the pond at Weir Farm, this quarry site would not be affected by project implementation. Expected site types within the project area are limited to small, low-density sites representing areas of limited activity (Mair and Ives, 2003). Therefore, ethnographic resources were dismissed from further consideration in this EA/Assessment of Effect.

Indian Trust Resources: Secretarial Order 3175 requires that any anticipated impacts to Indian trust resources from a proposed project or action by U.S. Department of Interior agencies be explicitly addressed in environmental documents. The Federal Indian trust responsibility is a legally enforceable fiduciary obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of Federal law with respect to American Indian and Alaska Native tribes.

There are no Indian trust resources in Weir Farm NHS. The lands comprising Weir Farm NHS are not held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians. Therefore, Indian Trust Resources were dismissed as an impact topic in this EA/Assessment of Effect.

## **Socioeconomic Environment**

Economy: Construction activities associated with the new maintenance/curatorial facility and the Westervelt House renovation under the Preferred Alternative would have short-term, negligible, beneficial impacts on the local economy due to short-term increases in employment opportunities and revenues for local businesses and government. Construction-related benefits to the local economy through wages, overhead expenses, material costs, and profits would last only the duration of construction, and would be minimal.

Visitation to the Park and to the local area would only increase negligibly as a result of the Preferred Alternative, and would result in negligible beneficial impacts on the local economy over the long-term through visitor spending. In addition, the Preferred Alternative would not

result in any new permanent jobs at the Park. Therefore, this resource topic was eliminated from further consideration in this EA/Assessment of Effect.

Land Use and Zoning: The proposed maintenance/curatorial facility would be compatible and consistent with surrounding land uses and with the land use plans of the Park, Fairfield County, and the Town of Ridgefield's Office of Planning and Zoning. Construction of the proposed new facility would not cause or require changes in the land use plans of the Park, Fairfield County, or the Town of Ridgefield. Old Branchville Road and Nod Hill Road are designated "scenic roads" by the Towns of Ridgefield and Wilton respectively. The Preferred Alternative would not change or affect this designation.

The Park provided the Town of Ridgefield, Office of Planning and Zoning with opportunity to comment on this project in a meeting held with the Office on January 16, 2004. The Office of Planning and Zoning commented that all exterior building lighting is required to have a full cutoff (all light must be pointed toward the ground). The proposed new maintenance/curatorial facility would be designed in accordance with this requirement.

Human Health and Safety: The NPS has a set of construction contract safety standards, which contractors for NPS projects must follow during construction to ensure the protection of workers and the public. During construction, these safety measures would be in place; therefore, any adverse impacts to worker or public safety from construction would be short-term, localized, and negligible in intensity. In addition, since the construction site is over a quarter of a mile from the Historic Core area of Weir Farm, visitors would unlikely enter the construction site.

Blasting would be required during construction of the new maintenance/curatorial facility. During blasting, the NPS would require the construction contractor to adhere to the requirements outlined in DO #65, *Explosive Use and Blasting Safety*, and the *NPS Handbook for the Storage, Transportation, and Use of Explosives* to protect public safety (NPS, 2003d). In addition, the NPS would notify all adjacent residents prior to blasting operations.

The proposed maintenance facility would reduce the movement of maintenance equipment to and from the Historic Core area and subsequently reduce conflicts with visitors and pedestrians. In addition, the consolidation of the employees and Park storage facilities in the new building would reduce the amount of vehicle miles traveled on public roadways over the long-term. Overall, long-term impacts on worker and public safety from the Preferred Alternative would be beneficial and negligible to minor in intensity.

The U.S. Environmental Protection Agency (USEPA) lists the former wire mill, the current site of the maintenance and curatorial facilities and staff, as a Superfund site. The relocation of NPS employees to the new maintenance and curatorial facility would reduce potential exposures to contaminated soil and water at the wire mill.

Waste Management: The Preferred Alternative would generate a small amount of solid, sanitary, and landscape/vegetative waste during construction activities; no hazardous wastes would be generated. All construction wastes would be the responsibility of the construction contractor, and would be temporarily stored, transported, and disposed of in accordance with State and

Federal laws and regulations and NPS policies, in approved disposal facilities (NPS, 1997b). The generation, containment, and disposal of wastes during construction and from facility use over the long-term would have a short-term and negligible impact on waste management. Existing disposal facilities have sufficient capacity to accommodate these wastes. Therefore, this topic was dismissed from further analysis in this EA/Assessment of Effect.

Utilities and Public Services: The existing Westervelt House is currently served with electric and telephone from an existing pole located on Old Branchville Road. The conversion of this house into an administrative use would not require significant upgrades to these services. Providing electric and telephone to the new maintenance/curatorial facility would require new underground services to be extended from Old Branchville Road to the new building and additional underground connections would be required to link the Westervelt House to the new building. Any required new electrical or communications services would tee off of the access road and would be located underground; no new lines would be cut into the property.

An existing septic system and existing potable water well serve the Westervelt House. These facilities are considered adequate for the proposed conversion of the Westervelt House to Park administrative use, although the well will be relocated when parking is established south of the Westervelt House. The proposed maintenance/curatorial facility would require a new septic tank and leach field, as well as a new water well to be drilled on the property. Design and installation of these new facilities would adhere to all current Health Code requirements.

All ground disturbance would be cross-checked against local utility maps prior to commencement of construction. Should damage to an existing line occur, the NPS would require that construction in the area be stopped, and the existing line immediately repaired prior to continuing construction activities. Operation of the proposed new maintenance/curatorial facility would not make excessive demands on local power, water, or sewage systems, and is not anticipated to impact existing or future services in the area. Therefore, this topic was dismissed from further consideration in this EA/Assessment of Effect.

Environmental Justice: Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*, requires Federal agencies to identify and address any disproportionate adverse human health or environmental effects of its projects on minority or low-income populations. According to this Executive Order, each Federal agency must conduct its programs, policies, and activities that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons or populations from participation in, denying persons or populations the benefits of, or subjecting persons or populations to discrimination under, such programs, policies, and activities because of their race, color, national origin, or income level.

Since the population surrounding the site has less than four percent minorities and less than two percent of people below the poverty level (USCB, 2000), neither the No Action alternative nor the Preferred Alternative would have a disproportionate, adverse impact on minority or low-income populations. Therefore, this topic was eliminated from further analysis in this EA/Assessment of Effect.

Protection of Children: Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, directs Federal agencies to “identify and assess environmental health risks and safety risks that may disproportionately affect children.” This Executive Order requires Federal agencies to “ensure that [their] policies, programs, activities, and standards address disproportionate risks to children.”

Low-density residential development borders the project site. These areas may be home to small children. However, there are no schools, child-care facilities, or other concentrations of children are near the site. Adverse effects on human health and safety that would result from the Preferred Alternative would be negligible and would have the potential to affect all people, regardless of age. The Preferred Alternative would pose no disproportionate environmental health or safety risks to children. Therefore, this topic was eliminated from further analysis in this EA/Assessment of Effect.

### **Visitor Use and Experience**

Recreation: There are no recreation sites or opportunities within or in the vicinity of the project area, and the area is not used for visitation. In addition, this area does not provide access to any recreational areas or other visitor sites. Therefore, this topic was eliminated from further analysis in this EA/Assessment of Effect.