



National Park Service  
U.S. Department of the Interior

## **Finding of No Significant Impact Environmental Assessment General Management Plan**

### **Rosie the Riveter/World War II Home Front National Historical Park Richmond, California**

Rosie the Riveter/World War II Home Front National Historical Park in Richmond, California is a relatively new unit of the national park system. The national historical park is a partnership between public and private entities and the National Park Service to preserve and interpret the historic sites and structures in Richmond, California, as a means to tell the stories and events of the American World War II home front. It is also a collaborative effort among local, regional, and national partners in order to connect visitors to sites and stories across the country to tell the national story. The collaborative nature of the park requires a commitment to building and sustaining relationships with individuals, neighbors, cooperating partners, and other communities of interest. Partners include citizens, communities, and private, governmental, and nonprofit entities that—through agreements and shared common goals—work together to achieve the mission of the national historical park.

The National Park Service (NPS), working with the many park partners, has prepared a general management plan / environmental assessment (GMP/EA) for the park. This plan is rooted in community efforts that began in the 1990s. The city of Richmond, California, has long recognized the national significance of their World War II history and the value of preserving the historic features of Richmond Shipyard No. 3 for future generations. In 1999, the Richmond City Council unanimously passed Resolution No. 129-99 expressing the city's support for the establishment of a national historical site in partnership with the National Park Service. Then, in 2000, Richmond's City Council unanimously passed two additional resolutions: No. 46a-00 (March 21, 2000) and No. 64-00 (April 18, 2000). These stated that, if the national historical park were established, it would be public policy that any future development and use of Shipyard No. 3 would be compatible with the continued preservation of intact historic resources and with public access to such resources. In 2000, President William Jefferson Clinton signed Public Law 106-352 establishing Rosie the Riveter/World War II Home Front National Historical Park. Congress recognized that Richmond, California retained the largest collection of intact historic sites and structures that could be preserved and used to tell the stories of the American World War II home front. The national historical park was established— *In order to preserve for the benefit and inspiration of the people of the United States as a national historical park certain sites, structures, and areas located in Richmond, California, that are associated with the industrial, governmental, and citizen efforts that led to victory in World War II...* Establishment of the national historical park in Richmond, California acknowledges the important role played by the city and the significant contributions and sacrifices of its citizens—and it commemorates

the efforts of countless Americans in cities and towns across the nation who made similar contributions and sacrifices to achieve victory in World War II.

## Purpose and Need for the Plan

A general management plan is needed to meet the requirements of Public Law 106-352, which established Rosie the Riveter/World War II Home Front National Historical Park, and the National Parks and Recreation Act of 1978. The legislation establishing the park directs that a general management plan be prepared in consultation with the city of Richmond, California, and be transmitted to the Committee on Resources of the House of Representatives and the Committee on Energy and Natural Resources of the Senate. On April 7, 2009, the Richmond City Council unanimously approved the *General Management Plan for Rosie the Riveter/World War II Home Front National Historical Park* as follows:

THEREFORE BE IT RESOLVED, that the City of Richmond, in accordance with g(2) of Pub.L. 106-352, Sec. 1, Oct. 24, 2000, 114 Stat.1370, does hereby approve of the *Rosie the Riveter/World War II Home Front National Historical Park General Management Plan/Environmental Assessment*, including selection of Alternative B as the preferred alternative; and,

THEREFORE IT BE FURTHER RESOLVED that the city council of the city of Richmond directs the city manager to provide a copy of this Resolution to the Secretary of the Interior.

The general management plan builds on the park's legislation, and on established resolutions, laws, and policies to develop a vision for the park's future. Three alternatives were identified and evaluated for future management of Rosie the Riveter/World War II Home Front National Historical Park. The alternatives, which were based on the park's purpose, significance, and special mandates, present different visions in providing visitor experiences, preserving park resources, and defining the roles and responsibilities of the National Park Service. The following are concerns identified during scoping and addressed in the general management plan:

- What elements of the park's sites and structures need to be preserved in order to tell the World War II home front stories? (The World War II-era historic sites and structures are maintained and managed by different public and private owners. The National Park Service does not own any of the historic sites and structures.)
- What is the purpose of the park's museum collection and how will future acquisitions be guided?
- Where should the curatorial and research facility be located?
- What should be the level and type of park services, orientation, and education necessary in order for visitors to experience and learn about the themes of the national historical park?
- What is the best location to berth the SS *Red Oak Victory* in order to integrate it with the World War II home front stories and the visitor experience of the national historical park?
- What role and contributions could the National Park Service provide to this partnership park?

## Selected Alternative

Alternative B, “Explore Richmond to Understand the National Home Front Story,” is the National Park Service’s selected alternative for implementation. There were no modifications to the general management plan / environmental analysis resulting from the Spring 2009 public workshop and comments. On April 7, 2009 the Richmond City Council voted unanimously to approve the selection of the NPS preferred alternative. In addition, the City Council has incorporated alternative B as an element in the *City of Richmond General Plan Update*. The primary focus of this alternative is to provide visitors with opportunities to explore Richmond’s World War II-era historic sites and structures in order to experience the scale and diversity of the American home front story. In this alternative, visitors will be able to view the exteriors and access some rehabilitated interiors of structures where artifacts, exhibits, and programs will connect visitors with park themes. The World War II Home Front Visitor/Education Center, located in the Ford Assembly Building complex, will interpret the national home front effort and orient visitors to Richmond’s sites and stories.

In working with its many cooperating partners to implement the vision of alternative B over the 15- to 20-year term of this plan, the National Park Service will pursue the following actions of the selected alternative:

- Establish and operate the World War II Home Front Visitor/Education Center in the Ford Assembly Building complex to provide the context to link Richmond sites with each other and with home front stories and sites throughout the nation.
- Develop interpretive exhibits for the World War II Home Front Visitor/Education Center.
- Provide visitors with orientation to park resources and interpretive themes at the World War II Home Front Visitor/Education Center.
- Develop and coordinate visitor programs at the World War II Home Front Visitor/Education Center that provide opportunities for Richmond and other communities to tell their own home front stories.
- Provide regularly scheduled walking and bus tours that originate at the World War II Home Front Visitor/Education Center and at other sites in Richmond.
- Provide self-guiding tour brochures to visitors at designated park sites.
- Provide technical assistance and support for interpretive waysides at sites and structures that represent the home front story in Richmond.
- Coordinate and encourage individuals and groups to develop World War II home front interpretive opportunities such as community and regional events, signs, and educational programs.
- Develop interpretation standards and provide technical assistance and training in telling Rosie the Riveter and World War II home front stories.
- Provide technical assistance, in collaboration with cooperating partners, in the planning and development of a vision for the preservation of a World War II worker community historic area.
- Work with other cooperating partners to interpret the known home front resources—Maritime Child Development Center, Nystrom Village, Atchison Village, Fire Station 67A, and Richmond Field Hospital—as part of a home front community.

- In addition to maintaining a website, develop and manage interpretive and educational programs for electronic access from across the nation using new technologies that include, but are not limited to, web-based access to the park's themes and stories, connections to other World War II home front sites from park sites in Richmond, California, and a digital Rosie the Riveter/World War II Home Front museum.
- Provide studies, reports, and professional/technical assistance that contribute to the preservation of the character-defining features of the World War II-era home front sites and structures named in the park's legislation and the landscapes in the vicinity of these sites and structures; agreements could be established between owners/cooperating partners for the National Park Service to assist with providing access for visitors and creating exhibits that interpret the sites' connections to the home front themes.
- Collect and preserve World War II home front oral and written histories and their associated artifacts and archives; as feasible, allow visitors to connect to stories and artifacts at park sites that support interpretive themes.
- Collect and preserve objects, artifacts, documents, and images that directly relate to the park's interpretive themes and that can be used in exhibits at the park's sites to interpret the national home front story.
- Locate and maintain a curatorial and research facility in a World War II-era historic structure in Richmond, California, that allows for the consolidation of the museum collections of four East Bay national park sites: Rosie the Riveter/World War II Home Front National Historical Park, Eugene O'Neill National Historic Site, John Muir National Historic Site, and Port Chicago Naval Magazine National Memorial.
- Locate the administrative office for Rosie the Riveter/World War II Home Front National Historical Park at a World War II-era historic structure in Richmond, California.

## Other Alternatives

Two other alternatives were considered for Rosie the Riveter/World War II Home Front National Historical Park. Alternative A, the no-action alternative, would result in no changes to the current direction of park management. This alternative provides a baseline for comparison by which to evaluate the direction and impacts that might occur if either of the action alternatives were implemented. In alternative A, visitors would continue to use self-guiding tools or join National Park Service-led guided tours to see World War II historic sites and structures in Richmond. Each park site would continue to be adapted to accommodate contemporary uses. The National Park Service would continue to gather home front stories and operate a small self-service visitor orientation center at Richmond City Hall.

In alternative C, "The Home Front Visitor/Education Center Tells the National Home Front Story," visitors would explore the World War II Home Front Visitor/Education Center to learn about the impacts and legacy of the American World War II home front. The visitor/education center would be the focal point of the park with the maximum amount of resources and interpretation centered at this location. Located at the Ford Assembly Building, the visitor/education center would present a diversity of stories from communities across America and would provide in-depth educational and research opportunities to advance the understanding of this vital chapter in American history. The National Park Service would work with cooperating partners in Richmond to retain significant resources as a backdrop to the visitor/education center. Tools would be available at the visitor/education center for visitors who

want a self-guiding experience around Richmond to see World War II home front sites and structures. Each park site would continue to be adapted to accommodate contemporary uses.

### **Other Options Considered But Dismissed**

Early in the development of the alternatives, an alternative D was developed. The concept for alternative D was to expose the visitor to a Richmond World War II home front setting that is preserved through adaptive use of the historic structures and settings. This would be accomplished by providing contemporary activities relating to commerce, culture, arts, education, and community services.

Feedback from public involvement activities affirmed that alternatives A, B, and C provided an appropriate range of future park visions. As alternative D was explored, it became evident that it entailed actions that were outside of the park purpose and beyond the ability of the National Park Service to enact. Therefore, it was dismissed from further consideration in the plan.

### **Mitigation Measures**

The National Park Service role is to support interpretation and education, provide technical assistance, and collaborate with other public and private partners in preserving historic resources and providing for visitor services. The preservation and management of the park's historic sites and structures are the responsibility of the public and private entities that own them; therefore NPS mitigation measures were not included in the environmental assessments of the alternatives.

The general management plan does provide direction for the National Park Service to develop a programmatic agreement (PA) to guide the implementation of all federally funded, permitted, licensed, or approved actions associated with the selected alternative, to ensure that the National Park Service fulfills all of its obligations under section 106 of the National Historic Preservation Act (36 CFR Part 800.14[b], *Programmatic Agreements*). The PA will be negotiated among the National Park Service, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, the City of Richmond, and any other interested federal, state, or local agencies and organizations. The NPS is currently consulting with these agencies on a memorandum of agreement to conclude the Section 106 requirements for the general management plan and environmental assessment that will stipulate the future consultation on this PA. The PA would minimally stipulate that the National Park Service is committed to ensuring that NPS *Management Policies 2006* and *The Secretary of the Interior's Standards for Treatment of Historic Properties* are followed regarding any historic property affected by federally funded, permitted, licensed, or approved actions; and that the National Park Service is committed to working appropriately with our partners to assist them in their activities to meet these standards. Until consultation on the PA is complete, the National Park Service will cooperate with all parties to ensure that, where applicable, the requirements of Section 106 are met for individual actions implemented from this general management plan.

### **Environmentally Preferred Alternative**

The National Park Service does not own the park sites and historic structures of Rosie the Riveter/World War II Home Front National Historical Park and therefore has limited ability to affect the environment. It is also a park consisting primarily of cultural resources, with few natural resources. The alternatives in the general management plan describe actions that influence the protection and preservation of the historic and cultural resources.

The environmentally preferable alternative is defined by the Council on Environmental Quality as “the alternative that will promote the nation’s environmental policy as expressed in the National Environmental Policy Act [Section 101 (b)].” Section 101 (b) defines the environmentally preferable alternative through the application of the six criteria listed below. Generally, the environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources. Each criterion is presented below, followed by a discussion of how well the proposed alternatives meet that criterion.

**1. Fulfilling the responsibilities of each generation as trustees of the environment for succeeding generations.** Under alternative A, the no-action alternative, the cooperating partners, including the National Park Service, would continue to provide minimal support services for visitors, but the level of services would be less than under either action alternative. Alternatives B and C would enhance the National Park Service’s ability to meet this criterion by allowing greater levels of service, increased levels of technical support for rehabilitation of historic structures, improved curatorial capability, and expanded potential for new visitor experiences. While both action alternatives would provide these additional services, alternative B would provide a greater level of on-site visitor access and service.

**2. Ensuring for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings.** Under alternative A, the no-action alternative, the national historical park would strive to provide safe, healthful, productive, and aesthetically pleasing surroundings for its visitors in areas that are the focus of the national historical park. Alternatives B and C would take steps to improve the safety and aesthetics in more areas of the park as new sites and opportunities are developed. Alternative B has the potential to provide greater opportunities for aesthetically pleasing surroundings because of a greater emphasis in retaining the historic appearance of more park sites and structures than provided for in alternatives A and C.

**3. Attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.** While the no-action alternative would continue to provide minimal uses, alternatives B and C would improve the park’s ability to meet this criterion. By providing support for more rehabilitation efforts, allowing for greater use of historic resources, and providing expanded opportunities for visitor experiences, alternatives B and C would provide more choices and a more accessible program. Of the two action alternatives, alternative B has the potential to meet the criterion throughout a greater area of the park than alternative C.

**4. Preserving important historic, cultural, and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice.** Under the no-action alternative, alternative A, the National Park Service would continue to maintain a support role to the other cooperating partners in the preservation of the park resources. Both action alternatives would allow for expansion of the National Park Service role in providing technical assistance to cooperating partners for preservation of important historic and cultural resources and in interpretation of park resources. Alternative B allows for a greater National Park Service role by providing additional support personnel for historic preservation.

**5. Achieving a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.** The cooperating partners strive to achieve a balance between population and resource use at Rosie the Riveter/World War II Home Front National Historical Park. Under the no-action alternative, the park would continue to meet this criterion. Both action alternatives would meet this criterion by improving visitor services with new interpretation, greater potential for rehabilitation, and overall improved visitor services. Because of the greater level of preservation and access to a majority of park areas, alternative B meets this criterion better than alternative A or C.

**6. Enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources.** Under the no-action alternative, there is limited opportunity to enhance sustainability of the park sites. Under the action alternatives, there would be greater opportunity to provide the technical expertise in historic building rehabilitation that could effect greater conservation of resources. Alternative B would have a slightly greater potential than alternative C for enhancing resource conservation in the park due to the greater level of preservation and anticipated community involvement.

Based on the analysis provided in the environmental assessment, alternative B is the environmentally preferable alternative. Alternative B surpasses the other alternatives in fulfilling expectations outlined by the Council on Environmental Quality. Although alternatives A and C meet all of the criteria to some level, they do not fulfill them to the level that alternative B does.

## **Why the Selected Alternative Will Not Have a Significant Effect on the Human Environment**

As defined in 40 Code of Federal Regulations (CFR) §1508.27, significance is determined by examining the following ten criteria:

### *Impacts that may be both beneficial and adverse*

None of the actions identified for the selected alternative will result in more than a moderate level of impact. Minor to moderate beneficial impacts resulting from the selected alternative were identified for historic structures and cultural landscapes (due to cooperative efforts to preserve these resources while allowing for contemporary uses), museum collections (due to an emphasis on collecting World War II home front materials), visitor use and experience (due to the maximizing of opportunities to preserve the World War II-era appearance and allow visitors to explore these sites and structures to learn about the home front stories), and the social and economic environment (due to increased community pride and sense of history).

Transportation impacts could be adverse and minor, as a result of increased park visitation resulting in more traffic. This potential impact could be mitigated if public transportation grows in response to future visitation.

### *Degree of effect on public health or safety*

Visitor safety will remain a priority under the selected alternative. None of the actions proposed in the selected alternative will adversely affect public health or safety. Indeed, several of the actions will beneficially affect public health and safety, including increasing park partner and

NPS staff presence, managing orientation and public information to guide visitors, and enhancing many of the park sites while providing for visitor services.

*Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas*

As described in the environmental assessment, Rosie the Riveter/World War II Home Front National Historical Park contains significant World War II-era historic and cultural resources, limited natural resources, and no prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. The industrial landscape of the Santa Fe Channel is an important geographic area that helps to tell the home front stories associated with the Kaiser Shipyards. The actions proposed in the general management plan will not adversely impact this industrial setting.

*Degree to which effects on the quality of the human environment are likely to be highly controversial*

None of the actions proposed in the selected alternative have the potential to be highly controversial. This is supported by the fact that the planning team received only a handful of comments during public review of the environmental assessment.

*Degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks*

As planning began for the establishment the national historical park, the residents and decision makers of Richmond, California have learned more about the importance of their historic resources and the significant role the community played throughout World War II. The community has embraced their history and is working to preserve key characteristics of the historic setting. There could be increases in vandalism to historic resources because they are scattered throughout the city. However, the contribution of the selected alternative to any adverse cumulative impact in this area is a small increment.

*Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration*

No-actions are proposed in the selected alternative that are inconsistent with the enabling legislation for Rosie the Riveter/World War II Home Front National Historical Park. The selected alternative will not set any NPS precedent for future actions with significant effects, and does not represent a decision in principle about a future consideration.

*Whether the action is related to other actions with individually insignificant but cumulatively significant impacts*

As noted in the environmental assessment, there could be long-term, minor, adverse cumulative impacts on the transportation patterns in the area, as park visitors and those associated with new development add to the overall transportation system. Among the other impact topics, the actions associated with the selected alternative will have a beneficial contribution to the overall cumulative impacts in maintaining historic structures, cultural landscapes, collections of World

War II histories and artifacts, enjoyment by park visitors, and the overall social and economic conditions.

*Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.*

As described in the environmental assessment, the NPS will work with all cooperating parties to ensure that all actions affecting historic properties listed or eligible for listing in the National Register of Historic Places meet the *Secretary of the Interior's Standards for Archeology and Historic Preservation (1983)*. Due to the avoidance of significant resources during construction activities, few, if any, adverse impacts to archeological resources are anticipated. Impacts to historic structures and cultural landscapes will be beneficial. No significant scientific, cultural, or historical resources will be lost or destroyed as a result of the selected alternative.

*Degree to which the action may adversely affect an endangered or threatened species or its critical habitat*

The NPS determined that the selected alternative will have no effect on federally listed threatened or endangered species or their critical habitat. The inland park sites (Maritime and Ruth C. Powers child development centers, Kaiser Permanente Field Hospital, Richmond Fire Station 67A) are in longstanding urban or commercial neighborhoods of Richmond. Each site is a developed or landscaped environment.

*Whether the action threatens a violation of federal, state, or local environmental protection law*

The actions of the selected alternative do not violate federal, state, or local environmental protection laws.

## **Impairment of Park Resources and Values**

A fundamental purpose of the National Park Service is to conserve park resources and values. The statutory requirements direct that the National Park Service must leave federally owned park resources and values unimpaired unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of the park resources or values. Evaluation of impairment does not apply to park resources that are owned by other public or private entities. Other than the museum collections, the resources and values at Rosie the Riveter/World War II Home Front National Historical Park are not federally owned and therefore a determination of impairment by the National Park Service is not applicable.

## **Public Involvement**

The general management plan represents the contributions from cooperating park partners; participants in local community workshops, public meetings and other organized forums; government agencies that are local, regional, and national; and public comments gathered at public workshops and through newsletters that included e-mails, letters, and response cards.

### **Cooperating Partners**

The cooperating partners are working to establish this national historical park, to achieve success and mutual benefit, and to carry out the park's legislated mandates. Throughout the planning process, the cooperating partners have evolved to include citizens, communities, private entities, governmental entities, and nonprofit organizations that share common goals in the effort to pursue, secure, and interpret the resources of the national historical park. The National Park Service hosted or participated in more than 240 meetings with officials, decision makers, and committees. Most of these meetings involved the participation of members and staff of the National Park Service; the City of Richmond; the Mayor's office; the Port of Richmond; Richmond Community and Economic Development; and other city departments, committees, and commissions. Other local cooperating partners include Contra Costa County, the Richmond Museum Association, Rosie the Riveter Trust, Levin Shipping, the Council of Industries, and the owner of the Ford Assembly Building.

In addition to the above meetings, the superintendent of Rosie the Riveter/World War II Home Front National Historical Park and staff organized more than 25 planning and informational meetings with citizens associated with local business and nonprofit organizations such as the Council of Industries, the Richmond Chamber of Commerce, the Richmond Convention and Visitors Bureau, the Western County Business and Professional Association, the Point Richmond Businessmen's Association, Atchison Village, and the League of Women Voters. The National Park Service also coordinated meetings with the managers or staff of county and regional governments including Contra Costa County, the San Francisco Bay Conservation and Development Commission, the California Coastal Commission, the San Francisco Bay Area Water Transit Authority, and the San Francisco Bay Trail.

During the planning process, nine workshops were conducted with cooperating partners and other subject-matter experts. These workshops were instrumental in building a vision for the national historical park.

### **Public Meetings and Newsletters**

Public meetings and newsletters were used to involve the public in the planning process. A "Notice of Intent" to prepare an environmental impact statement for *Rosie the Riveter/World War II Home Front National Historical Park General Management Plan* was published the March 26, 2002, *Federal Register* (page 13801).

In July 2002, the first planning newsletter was prepared, with input from cooperating partners, and distributed throughout the San Francisco Bay Area. The National Park Service held eight public meetings throughout the San Francisco Bay area in the cities of Richmond, Oakland, San Francisco, Vallejo, and Palo Alto to scope the ideas and concerns for this new park. More than 2,300 newsletters were mailed to individuals on the park mailing list and distributed at the public meetings and other community events.

A second planning newsletter was prepared and distributed in November 2003. This newsletter provided the public with the opportunity to comment on the park foundation that the planning team and cooperating partners had developed. A total of 3,000 newsletters were printed and mailed out or distributed at various park events. Comment cards were included to encourage public comments.

In October 2004, a third newsletter was printed and 11,100 copies were distributed by mail; another 900 were distributed at public meetings and other community events. This newsletter presented the public with four alternative visions for the new park and invited interested individuals to attend the two public meetings in Oakland and three in Richmond during November 2004. Comment cards were included in each newsletter. The planning team received 232 letters by mail and e-mail. A total of 103 people participated in the five public meetings held in California. The tone of the public meetings and comments was supportive of establishing the national historical park and the level of interest in making the park succeed continues to rise.

Following the initial environmental analysis on May 7, 2007, the National Park Service published in the Federal Register a "Notice of Termination" of the Environmental Impact Statement (EIS) for the General Management Plan, Rosie the Riveter/World War II Home Front National Historical Park, Richmond, California. As the general management plan evolved, the National Park Service determined that an environmental assessment rather than an environmental impact statement would be the appropriate level of NEPA documentation for this plan.

In February 2009, the general management plan/environmental assessment was distributed to approximately 300 stakeholders and notices of its availability were sent to individuals and groups listed on the park's mailing database. Copies were made available at Richmond Public Library for individuals without electronic access to the online version. An electronic version of the general management plan and comment card was made available at the NPS planning website. A public workshop was held on March 18, 2009 and was attended by 38 individuals. The 60-day public comment period ended on April 29, 2009.

### **Section 106 Consultation**

The California State Historic Preservation Officer is in agreement with National Park Service in closing the GMP Section 106 consultation. A memorandum of agreement, currently being prepared as part of the closeout, includes a variety of stipulations such as archeological resources, treatment of Native American human remains, disclosure of sensitive information, and the rehabilitation and investment tax credit projects as identified in the General Management Plan / Environmental Assessment. In addition, the memorandum of agreement provides guidance for developing a "Programmatic Agreement" among the City of Richmond; California State Historic Preservation Officer; the Advisory Council on Historic Preservation; and any other interested federal, state, or local agencies and organizations. The "Programmatic Agreement" will fulfill the needs under Section 106 to guide implementation of all federally funded, permitted, licensed, or approved actions associated with the selected alternative of the general management plan. In addition, NPS staff will follow through with a request from the California State Historic Preservation Officer to send a final letter highlighting the Section 106 closeout to the Native American tribes who were contacted throughout the general management planning process.

## **Responses to Selected Comments Received During the Public Review of the Draft General Management Plan/EA**

Comments and concerns were received during the public review of the Draft General Management Plan/Environmental Assessment, however none reached the threshold of "substantive." Substantive comments are defined by NPS Director's Order 12 (DO-12, Section 4.6A) as one that does one or more of the following:

- Question, with a reasonable basis, the accuracy of information in the EA;
- Question, with a reasonable basis, the adequacy of the environmental analysis;
- Present reasonable alternatives other than those presented in the EA; and/or
- Cause changes or revisions in the proposal.

The comments received have been summarized below along with NPS responses.

Comments or Concerns	Responses
<i>Preference for alternative B.</i>	Most of the public comments were positive and support establishing the Rosie the Riveter/World War II Home Front National Historical Park and implementing the ideas and concepts described in alternative B.
<i>The need to continue port uses and ensure public safety at Shipyard No. 3.</i>	Alternative B incorporates the contemporary port uses of Shipyard No.3 as part of the backdrop to its historic sites and structures. The NPS will continue to work closely with San Francisco Bay Conservation and Development Commission (BCDC) and the Port of Richmond to ensure public safety, support contemporary port uses, address issues related to providing public access in the port priority use area, and any future opportunities to expand the visitor use within Shipyard No. 3.
<i>A greater emphasis is needed to encourage visitors to access and explore the park along the San Francisco Bay Trail.</i>	NPS supports encouraging visitors to access the park and park sites along the San Francisco Bay Trail. NPS will work with TRAC (Trails for Richmond Action Committee) and the City of Richmond, CA, to promote trail use and provide interpretive signs and programs along the trail.
<i>Integrating other historic sites and structures within Richmond, Ca, with the national historical park.</i>	Alternative B would continue to develop partnerships with many public and private entities working collaboratively to preserve historic World War II resources and tell America's home front stories. NPS would provide opportunities for individuals and organizations to tell their own stories at park sites and would encourage the telling of home front stories throughout the greater Richmond community. A goal of this partnership park is to nurture stewardship of the multilayered World War II home front experience and legacy and to facilitate conversations that lead to a shared understanding of the full meaning and contemporary relevance of the World War II home front.
<i>Integrating with other representative World War II home front sites across the country.</i>	Alternative B would result in developing and implementing interpretive and educational programs for distance learning across the nation. This would provide for a larger audience to learn about the park's themes and stories as well as make connections to many representative World War II home front sites.

## Conclusion

Based on the environmental analysis as documented in the environmental assessment, with due consideration for the nature of the public comments received, the determination is made that the approved plan is not a major federal action significantly affecting the quality of the human environment. Adverse environmental impacts that could occur are no more than minor in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of



