

National Park Service
US Department of the Interior

Martin Luther King, Jr. National Historical Park
Georgia



FINDING OF NO SIGNIFICANT IMPACT

July 2025

**King Family Home Site Plan / Environmental Assessment
Martin Luther King, Jr. National Historical Park**

Recommended:

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INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] §§ 4321 *et seq.*); the Department of the Interior NEPA regulations (43 Code of Federal Regulations [C.F.R.] § 46); and NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis and Decision-making* and its accompanying NPS NEPA Handbook,¹ the National Park Service (NPS) prepared an environmental assessment (EA) to examine alternatives and environmental impacts associated with a proposed site plan providing management guidance for the King Family Home (the home) at Martin Luther King, Jr. National Historical Park (the park). The purpose of the proposed project is to prepare a site plan that will guide management of the newly acquired property that includes long-term strategies for protecting the King Family Home, minimizing impacts to the surrounding neighborhood, and providing opportunities for visitors to learn the story of Dr. King's life and legacy, including the family's connections to the Vine City neighborhood and their contributions to the civil rights movement.

The *King Family Home Site Plan / Environmental Assessment* (site plan/EA) analyzed three alternatives: the no-action alternative (alternative A), which provides a basis for comparing environmental impacts of the action alternatives, and two action alternatives for implementing changes for rehabilitation and visitor access (alternative B and alternative C).

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the site plan/EA and the associated decision file. The site plan/EA was made available for public review from April 28 through May 30, 2025. During the comment period, the NPS received six pieces of correspondence of which three were considered substantive. Attachment A provides the public comment analysis report, including NPS responses to substantive comments received on the site plan/EA. As required by NPS *Management Policies 2006*, a determination of non-impairment is included as attachment B.

SELECTED ACTION AND RATIONALE FOR THE DECISION

The NPS selected action for implementation is "Alternative B (Proposed Action)," as described on pages 14-29 of the site plan/EA; a summary of the selected action is below.

Under the selected action, the King Family Home and the landscape will be rehabilitated according to recommendations in the historic structures report and the cultural landscape report (CLR), respectively. Structural and mechanical systems throughout the home will be replaced and upgraded as appropriate to meet current life safety codes. Water infiltration and drainage issues will be addressed, and hazardous materials will be removed or mitigated as appropriate. Rehabilitation

¹Executive Order 14154, *Unleashing American Energy* (Jan. 20, 2025), and a Presidential Memorandum, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity* (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 *et seq.* Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The National Park Service verifies that it has complied with the requirements of NEPA, including the Department's regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and Part 516 of the Departmental Manual, consistent with the President's January 2025 Order and Memorandum. The National Park Service has also voluntarily considered the Council on Environmental Quality's rescinded regulations implementing NEPA, previously found at 40 C.F.R. Parts 1500– 1508, as guidance to the extent appropriate and consistent with the requirements of NEPA and Executive Order 14154.

activities will balance the preservation of the site's historic character with the need for structural stability, code compliance, and accessibility for visitors and NPS personnel.

The NPS will interpret the home to the 1964–1972 time period. The home will be open to guided tours of up to 15 people per tour and will require visitors to reserve a tour at the park's visitor center; those without a reservation will be able to view the home from the exterior landscape. The NPS will create and install standard park identification, informational, and wayfinding signage. Details of the interpretive stories as well as furnishings and objects to be included in the home will be determined through an interpretation plan and a historic furnishings plan to be developed by the NPS during future project phases.

The driveway, walkway, and north side patio areas will be graded and repaved for accessibility using a material with a visual appearance that closely matches the historic surface. The back yard, including the children's playset, will be rehabilitated as an exhibit viewed from the patio area; visitors will not be allowed access into the yard due to safety and accessibility concerns.

There will be no dedicated parking within the King Family Home site. The primary method for visitors to travel to the site will be via a shuttle from the park's visitor center, the details of which will be determined in a future project phase. In order to minimize disruption to residents, the NPS will coordinate with local tour companies for appropriate locations for large buses to stop near the King Family Home, educate visitors on the City of Atlanta parking restrictions, and work with the City of Atlanta to designate accessible parking spaces along Sunset Avenue near the site.

Under the selected action, an accessible route into the first floor will be provided via an exterior ramp to the existing entrance on the north side of the house. Immediately inside the entrance, the existing laundry and utility rooms will be opened up to create an accessible entry space, and a new interior door will be created from the side entrance through the guest room to the main central hallway. Tours will allow visitors to enter and walk through larger spaces in the home such as the living room, dining room, family room, and bedrooms; smaller spaces such as the kitchen, bathrooms, and Dr. King's study will be closed off and visitors will be able to only view the rooms. Some areas, such as the shared entry between the children's bedrooms, will be modified to make the space more accessible and improve circulation.

An accessible route into the basement will be created via an interior ramp behind the garage through the existing utility room and storage room, connecting through the stair hallway area, and into the general office area via a new interior door opening. Ramp construction will likely require the lowering of basement slab elevations in areas, and the existing steps and built-in planter west of the garage will be removed. The historic entry door from the garage will be kept in place as this was the route Dr. King used to enter the home.

Once inside the basement, visitors will be able to enter the reception and general office areas as well as the rec room. The rec room could be used as a flexible space for special exhibits, a short film, or other gathering space. Areas that will be viewed but not entered due to space constraints include Coretta Scott King's office and the historic bathroom. An emergency egress will be created at the rear of the rec room through existing storage areas and into the back yard; some excavation of the back yard adjacent to the home will be required for the egress. A new accessible restroom will be created in the existing storage area on the south side of the rec room.

Rationale

The NPS's selected action, as presented in this FONSI, best meets the project's purpose to not only guide management of the newly acquired property but also develop long-term strategies for preserving and protecting the King Family Home while minimizing impacts to the surrounding neighborhood of Vine City. The NPS also considered two other alternatives, "Alternative A: No Action," which would continue current management of the property, and "Alternative C," which proposed more substantial alterations to the home and landscape to address the key issues. See chapter 2 of the site plan/EA for details of those other alternatives.

Implementing the selected action will resolve the existing issues related to the aging home that would continue under "Alternative A: No Action," including stormwater drainage and water infiltration issues, missing and damaged historic materials, and lack of accessibility. Alternative C would resolve these issues and meet the purpose of and need for the site plan, but it proposes alterations that would more substantially alter the historic appearance from primary spaces such as the front of the property than would the selected action. The selected action will best balance the physical alterations needed to provide safe, equal access and ensure the overall historic character and integrity of the property is protected.

The selected action addresses a range of issues associated within the project scope including the following (see page 6 of the site plan/EA for more information):

- The project area sits within an urban residential neighborhood that is approximately three miles from the rest of the park, including the visitor center and staff offices.
- There is insufficient space for visitor parking, including accessible parking, within the immediate vicinity of the site.
- The home structure is aging and in need of repairs to protect and preserve the historic fabric and character. Water infiltration and poor ventilation have resulted in water damage, growth of mold and mildew, and deterioration of finishes, particularly in the basement.
- The project area is not physically accessible for visitors and NPS staff of all abilities. The home has stairs and other elements that may not meet modern codes and may prove to be unsafe.
- The park does not currently interpret the story of the King family while they resided in Vine City and their connection to the neighborhood and community.
- There are no restrooms or other visitor facilities in the project area.

Mitigation Measures

The NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the NPS will implement multiple mitigation measures and best management practices to protect natural and cultural resources, the visitor experience, and the surrounding neighborhood. These measures and practices are described on page 45 of the site plan/EA and are hereby incorporated by reference. As stated in the EA, the mitigation measures and best management practices are integral parts to the proposed project that will be implemented under the selected action. The NPS may develop additional mitigation measures in consultation with the Georgia State Historic Preservation Officer (SHPO) through continued consultation under Section 106 of the National Historic Preservation Act (NHPA) as design development continues. Additional mitigation measures were not needed to reduce environmental impacts below the significance threshold as defined by the NPS NEPA handbook.

The NPS has the authority to implement the mitigation measures presented on page 45 of the site plan/EA under the Organic Act, the NHPA, NPS *Management Policies 2006*, and other federal and state applicable requirements.

FINDING OF NO SIGNIFICANT IMPACT

The NPS reviewed the environmental impacts described in chapter 3 of the site plan/EA and determined that no significant direct or indirect impact will occur to any of the park's resources as a result of implementation of the selected action.

The NPS considered the following actual or potential project effects in evaluating the degree of the effects for the selected action. As summarized below and documented in chapter 3 of the approved site plan/EA, the selected action has the potential for impacts, both positive and negative, to historic structure, cultural landscape, visitor use and experience, and socioeconomic resources. However, the NPS did not identify any significant adverse effects from implementing the selected action.

Historic Structure

Rehabilitation of the historic home under the selected action will result in a beneficial impact because the overall appearance, functionality, and sustainability of the structure will be improved and because the house will be restored to an appearance more closely resembling what it looked like during the period when the family resided in the home. Rehabilitation will also stabilize the property through structural improvements, waterproofing, and drainage improvements which will protect masonry surfaces and interior materials and finishes from continued degradation. The conservation, repair, or replacement in kind of historic features and finishes will result in a beneficial impact because historic fabric will be returned to good condition, restoring the historic character of the home. Implementation of the selected action will be guided by a historic structure report and other treatment documents to ensure conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines.

Actions related to creating accessible entry into and throughout the home as well as for emergency egress and life safety will result in adverse impacts on the historic structure due to removal of some historic materials, introduction of contemporary elements, and alteration of some interior spaces. Impacts of these actions will be minimized by limiting the changes to areas of the home and property that do not contain primary character-defining features and are generally screened from view from the front of the home or main interior living areas. For example, the interior ramp to the basement will require substantial alteration to a portion of the basement; however, these areas were not historically used by visitors to the King family as they were storage and utility spaces. The important character-defining feature of the historic garage entry door where Dr. King would have entered the home will be retained to convey that story. Through the selected action, the NPS will balance access and safety with protection of important character-defining features of the historic structure.

Temporary adverse impacts will also occur during construction when equipment, materials, and activities will be evident on the property, temporarily diminishing its historic character; however, these impacts will only last the duration of construction, and the historic character will be notably improved over the existing conditions when construction is complete.

Under the selected action, rehabilitation efforts will result in beneficial impacts that offset the adverse impacts. Rehabilitation of the historic structure under the selected action will ensure the

overall character, appearance, and historic integrity of the King Family Home remains intact while balancing safe and equal access to the home. Therefore, although there will be some adverse impacts associated with the selected action, they will not be significant.

Cultural Landscape

Rehabilitation of the King Family Home cultural landscape under the selected action will result in an overall beneficial impact because the landscape's character-defining features will be maintained and protected, including the yards, driveway, home, vegetation, and small-scale features. Damaged or missing historic elements will be repaired, replicated, or replaced in kind, which will allow the landscape to more closely resemble the appearance of the 1964–1972 period. The installation of an improved drainage system will protect the landscape from continued degradation due to storm events. All elements of the selected action will be guided by a CLR and other treatment documents to ensure conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines.

Modifications for accessibility and life safety will result in some adverse impacts on the cultural landscape due to alteration of its visual character. These actions include excavation of part of the back yard for emergency egress, addition of a ramp on the north side patio area, and introduction of contemporary materials. However, these features will be located and designed to be screened from view from the front of the property and public areas such as the sidewalks and roadway. Other actions will result in minimal visual changes, such as the regrading of the driveway to create accessible slopes, which will be implemented using materials that closely replicate those used during the 1964-1972 time period, and installation of park signage, design and placement of which will be guided by the CLR. These alterations to the landscape would generally be reversible if the NPS desired to return the site to a more accurate appearance in the future.

Temporary adverse impacts will also occur during construction when equipment, materials, and activities will be evident on the landscape, temporarily diminishing its historic character; however, these impacts will only last the duration of construction, and the historic character of the landscape will be notably improved over the existing conditions when construction is complete.

Under the selected action, rehabilitation efforts will result in beneficial impacts that offset the adverse impacts. Rehabilitation will ensure the overall character, appearance, and historic integrity of the cultural landscape remains intact while balancing safe and equal access to the site. The selected actions will ensure the landscape's historic and character-defining features will be repaired, protected, and maintained in the long term; therefore, although there will be some adverse impacts associated with the selected action, they will not be significant.

Visitor Use and Experience

Under the selected action, providing a new experience for visitors to the park will result in an overall beneficial impact on visitor use and experience. Visitors will have the opportunity to learn new stories about the King family including Dr. King as an ordinary man who valued time with family and friends, Coretta Scott King and her substantial contribution to the civil rights movement through the continuation of Dr. King's legacy, and the King children and their life growing up in Vine City.

Offering guided tours of the home will provide an immersive experience for visitors to see the home and furnishings while listening to an NPS staff or volunteer discuss the important stories that occurred at the property. Ramps and other alterations for accessibility may somewhat detract from

the immersive experience as they were not historically present and will be located in areas not typically used as entry points for visitors of the King family; however, they will provide safe and reliable access for visitors of all abilities, ensuring equitable access and opportunities for everyone. Interpretation will allow visitors to understand the historic appearance of these modified areas. Although some of the smaller spaces in the home may feel crowded on a tour, visitors will not remain in these spaces for long durations and efficient circulation will minimize any negative impact. The NPS will also monitor visitor complaints and will implement management strategies related to tours as appropriate.

The selected action will result in impacts that may be either beneficial or adverse depending on the preferences of the individual visitor. For example, reservations for guided tours and the use of a shuttle system may provide a benefit to visitors who are able to plan their trip in advance and prefer to have a set schedule. Other visitors may have an adverse experience if they are unable to get a tour reservation or want to have more spontaneity and independence to visit other sites in the Vine City neighborhood. To mitigate any negative impacts, the NPS will provide other means of learning about the site through interpretive resources such as wayside panels, online information, or exhibits in the visitor center, which will help inform visitors and manage their expectations. Furthermore, adverse impacts associated with the need for advanced planning are anticipated to diminish as public awareness increases and visitor behavior shifts over time.

Overall, opening the King Family Home to the public through guided tours will create opportunities for visitors to further learn about the contributions of the King family while introducing a unique “human” element by allowing them to see where and how the family lived—the spaces where they ate, slept and relaxed, where their children played, and where they entertained friends, family, and other guests. The selected action will result in an overall beneficial impact on visitor use and experience; although some visitors will experience adverse impacts as a result of the selected action, these impacts will be minimized, and they will not be significant.

Socioeconomic Resources

Under the selected action, the rehabilitation and protection of the King Family Home and landscape will result in a beneficial impact on the overall character of the surrounding neighborhood as it will ensure the aesthetic and visual appearance of the property is well maintained in the long term. Implementation of the selected action is not expected to alter the population or socioeconomic make-up of the neighborhood, though it will draw more tourists to the area. The potential for a more varied demographic make-up of visitors to the King Family Home, and thus the Vine City neighborhood, will not affect community cohesion as visitors are temporary in nature, but the influx of people to the area could be noticed by residents. Opening the King Family Home to the public may spur some economic development in the general area; however, the impact will likely be small when compared with the overall growth and development by other entities that Vine City is currently experiencing.

The NPS will minimize adverse impacts resulting from the anticipated influx of visitors to the site through public education on how to visit the King Family Home including hours the site is open, how to travel via public transportation, and where to park if traveling independently. The shuttle system that will be implemented under the selected action will reduce the number of personal vehicles traveling and parking along Sunset Avenue; noise impacts of the shuttle vehicle will be limited to daytime hours when the park is open, generally 9am to 5pm. The NPS will work with commercial tour companies to provide information regarding the use of buses and other large

vehicles in the neighborhood, including appropriate locations for bus stopping, staging, and parking to minimize disruptions on neighbors.

The NPS is committed to mitigating the adverse impacts of the selected actions and ensuring more equitable outcomes for residents through continued engagement with the City of Atlanta, project stakeholders, residents, and organizations such as the Westside Future Fund. As a whole, the selected action will result in a beneficial impact on socioeconomic resources by rehabilitating and protecting one of the most culturally and historically significant landmarks in the area. While the development of the King Family Home into a tourist site may contribute a small increment to the overall rise in property values and concerns of gentrification, the anticipated benefits outweigh the adverse increment. Therefore, although there will be some adverse impacts associated with the selected action, they will not be significant.

PUBLIC INVOLVEMENT AND AGENCY AND TRIBAL CONSULTATION

Public Outreach During the Comment Period

The NPS issued a media release on April 28, 2025, announcing the availability of the site plan/EA for public review and comment. The media release was distributed widely to media members, nonprofit organizations, private individuals, and other interested stakeholders to notify them of the opportunity to comment. The NPS posted the site plan/EA on the NPS Planning, Environment, and Public Comment (PEPC) website (<https://parkplanning.nps.gov/KingFamilyHome>), and the public was encouraged to submit comments through this website. During the public comment period, the NPS conducted two public meetings, one virtually via a Zoom Webinar and one in-person in the Vine City neighborhood. Overall, the comments were generally supportive of the preferred alternative, with some ideas offered for interpretation and tours. See attachment A for more detail of the public comments received on the site plan/EA.

Tribal Coordination

The NPS invited the following Tribes to participate in the consultation process via letters sent on May 27, 2025. No responses have been received from the Tribes to date.

- Absentee Shawnee Tribe
- Alabama-Coushatta Tribe of Texas
- Cherokee Nation
- Coushatta Tribe of Louisiana
- Eastern Band of Cherokee Indians
- Eastern Shawnee Tribe of Oklahoma
- Kialegee Tribal Town
- Muscogee Creek Nation
- Poarch Band of Creek Indians
- Seminole Tribe of Florida
- Seminole Tribe of Oklahoma
- Shawnee Tribe
- Thlopthlocco Tribal Town
- United Keetoowah Band of Cherokee Indians in Oklahoma

Section 106 of the National Historic Preservation Act

The NPS conducted consultation under Section 106 of the NHPA concurrently to but separately from the NEPA compliance process. The NPS initiated Section 106 consultation with the Georgia SHPO via a letter dated July 17, 2024. The NPS sent letters to relevant Tribes inviting their participation under Section 106 on May 27, 2025, as summarized above. The NPS continued consultation with the SHPO via letter sent on June 3, 2025. The letter included a project summary, area of potential effects, identification of historic properties, assessment of effect on historic properties, and an enclosed copy of the site plan/EA. The NPS requested conditional concurrence from the SHPO that the project would have no adverse effects on historic properties with the condition that consultation under Section 106 will continue throughout the future design development process. In a letter dated July 1, 2025, the SHPO concurred that the proposed project will have no adverse effects to historic properties within the APE, as defined in 36 CFR Part 800.5(d)(1), due to the scope of work, existing modern intrusions, and proposed conditions. The NPS will consult with the SHPO, interested Tribes, and other consulting parties as appropriate through the design development process to identify measures to avoid, minimize, and mitigate any potential adverse effects.

U.S Fish and Wildlife Service/Section 7 of the Endangered Species Act

The NPS reviewed the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation database to determine the potential for any special status species to occur within the project area. The data indicated that three special status species may occur within the vicinity of the project area including the tricolored bat (*Perimyotis sublavus*), the whooping crane (*Grus americana*), and the monarch butterfly (*Danaus plexippus*). A review of the project area indicates that there is no suitable habitat for the whooping crane or breeding habitat for the monarch butterfly within the project area; trees in the vicinity may serve as roosting habitat for the tricolored bat; however, these trees are not proposed for removal or disturbance. This project does not have the potential to result in impacts on any threatened or endangered species; therefore, formal consultation with the USFWS under Section 7 of the Endangered Species Act was not required.

CONCLUSION

As described in this document, the selected action does not constitute an action meeting the criterion that normally requires the preparation of an environmental impact statement. The selected action will not have a significant effect on the human environment in accordance with section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this project and, thus, will not be prepared.

ATTACHMENT A: PUBLIC COMMENT RESPONSE REPORT

INTRODUCTION

The National Park Service (NPS) released for public review the *King Family Home Site Plan Environmental Assessment* (site plan/EA) for Martin Luther King, Jr. National Historical Park (the park) on April 28, 2025. This report describes the public comment period held by the NPS between April 28 and May 30, 2025, including an analysis and summary of public comments received. This public review process provided an opportunity for the NPS to solicit public input on the purpose and need for the project, the issues, alternatives, and environmental analysis presented in the site plan/EA under the National Environmental Policy Act. After the public comment period ended, the NPS used an established protocol to analyze and summarize the public comments received.

PUBLIC OUTREACH

A news release notifying the public about the project, the comment period, and public meetings was released on April 28, 2025. The comment period was open for 33 days, through May 30, 2025. Two public meetings were held during the public comment period, one virtual and one in person. During each meeting, the NPS gave a presentation on the purpose and need, issues, alternatives, and potential impacts analyzed in the site plan/EA followed by a question and answer period. The virtual meeting was held on Tuesday, May 13, 2025, at 2pm ET using the Zoom Webinar platform. The in-person meeting was held on Thursday, May 15, 2025, at 7pm ET at the West Side Future Fund offices located at 970 Jefferson Street NW in Atlanta. A total of 7 participants joined the Zoom Webinar and 14 people attended the in-person meeting, not including NPS and consultant staff. Participants at both meetings were encouraged to submit formal comments electronically via the NPS's Planning, Environment, and Public Comment (PEPC) system, and comment cards were provided at the in-person meeting.

During the open comment period, a total of 6 pieces of correspondence were received, including 3 correspondence submitted directly through PEPC, 2 via comment cards collected at the in-person public meeting, and 1 via email.

COMMENT SUMMARY

Each piece of correspondence was reviewed, and specific comments were identified. A comment is a portion of the text within a correspondence that addresses a single subject. It could include information such as an expression of support or opposition for a project, additional data regarding the existing condition, or suggestions for strategies to be considered. A total of 40 comments were identified within the correspondence.

Overall, commenters were supportive of the project, and a few stated they supported implementation of alternative B. In particular, commenters supported the proposed shuttle system, the accessible restroom, and the proposed ramp access into the home. Commenters offered many suggestions for management actions for the King Family Home related to guided tours, interpretation, and visitor services. Some suggestions were out of the scope of this project, such as those relating to other park locations or sites outside of the NPS jurisdiction, but the NPS may consider them during other future planning efforts for the park. Commenters also expressed

concern for potential impacts the project may have on the historic home and furnishings as well as on the surrounding neighborhood; a commenter noted that these impacts appear to be greater under alternative C than under alternative B. One commenter expressed concern regarding the overall slow pace and lack of transparency of the planning process.

All comments received for this project were reviewed and grouped into topics that summarize the issues and ideas identified by each comment. The NPS identified substantive comments and grouped those into concern statements, which summarize in a concise manner the issues and ideas expressed in the substantive comment. Substantive comments are defined by NPS NEPA regulations as those that:

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the NEPA document; or
- cause changes or revisions in the proposal.

Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive. Concern statements that summarize the substantive comments received and the associated NPS responses are detailed below.

CONCERNS AND RESPONSES

The following concern statements represent summaries of the substantive comments received on the site plan/EA. A response from the NPS follows each concern statement, along with details of any resulting changes to the site plan/EA if applicable. The concern statements are organized by topic below.

Suggestions: Interpretation

The following concern statements include suggestions offered by commenters related to interpretation of the King Family Home.

Concern: Youth Programming at the King Family Home

A commenter suggested that the NPS offer interpretation and experiences of the King Family Home that are for children and youth. This commenter suggested restoring the back yard play set for children to experience along with a back yard scavenger hunt that incorporates facts about the King Family and the King children. Another commenter suggested the NPS update the Junior Ranger booklet to include information about the King Family Home.

Response

As stated on page 14 of the site plan/EA, an interpretation plan would be developed by NPS during future design phases which would identify the key stories to be conveyed during tours and the specific methods of interpreting those stories. The site plan/EA also allows for flexibility in the types of tours offered (see page 14), which may include special tours designed for a youth audience and school groups. As separate projects, the NPS may consider ways to convey the story of the King Family Home through other media for those without tours such as brochures, websites, and potentially an updated Junior Ranger Booklet. The NPS may consider these public comments during future development of the interpretation plan, tour details, and other media.

The NPS considered allowing visitors access into the back yard during the planning process but decided to dismiss it from further consideration due to safety and accessibility issues. The yard would require substantial grading and alterations to create a safe and accessible route for visitors due to the slopes and presence of large stump and tree roots in the yard. Additionally, the historic metal play set is unsafe for visitor use in its current condition, and modifications to meet current safety standards would alter the historic character and appearance. Allowing visitors to walk through the back yard would also result in trampling of the turf grass lawn, which is a contributing feature to the cultural landscape. All of these alterations and modifications would diminish the historic appearance, character, and integrity of the landscape of the back yard. The diminished integrity and the safety and accessibility concerns resulted in the NPS decision to dismiss this from further consideration.

Concern: Other Interpretation Suggestions

Commenters offered several other suggestions about interpretation of the King Family Home and things they would like to experience during a visit. These suggestions include the following:

- Provide a brochure of the King Family Home for visitors to take home; the brochure should feature Vine City and have a QR code for other language translations and directions.
- Focus stories on the family life of the Kings and their children, allowing visitors to immerse themselves in the lives of this American family.
- Incorporate videos into the home experience.
- Interpret the garage as a safety measure installed by the King Family as a reaction to the events at the Medgar and Merlie Evers Home.
- Allow a means for visitors to record their personal stories and experiences of the home, family, or neighborhood while the Kings resided at the home.

Response

As stated on page 14 of the site plan/EA, an interpretation plan would be developed by NPS during future design phases which would identify the key stories to be conveyed during tours and the specific methods of interpreting those stories. The NPS may consider these public comments during development of the interpretation plan.

Suggestions: Visitor Experience

The following concern statements include suggestions offered by commenters related to the overall visitor experience at the King Family Home.

Concern: Last-Minute Tour Tickets

A commenter suggested that the NPS hold some tour reservation tickets so they could be made available for visitors wishing to book a tour last-minute in order to allow for some spontaneity in visits.

Response

Specific details regarding how the NPS releases reservation tickets for tours of the King Family Home would be developed during future design phases of the project and would be informed by NPS policy as well as their existing tour reservation system for the Birth Home site. The NPS would consider this suggestion during that process. The NPS would monitor the visitor experience related

to tours (as described in pages 15-16 and appendix A of the site plan/EA) and would implement management strategies as appropriate if the proposed threshold of 10 complaints per month related to tours at the King Family Home.

Concern: Gift Shop at the King Family Home

A commenter suggested that the NPS build a gift shop at the King Family Home to sell keepsake items related to the site.

Response

Due to the limited size of the King Family Home property, any proposed new structure on the site would be located in close proximity to the home and would potentially be highly visible from the public sidewalk and streets. A contemporary structure would detract from the cultural landscape and would result in substantial adverse impacts on the historic character; therefore, the NPS is not considering this as a feasible option for the King Family Home.

Concern: Other Suggestions for Tours

Commenters offered several suggestions for additional actions the NPS should consider regarding implementation of guided tours of the King Family Home. These suggestions include the following:

- Give the inaugural tour of the King Family Home to members of the King Family and retired rangers from the park.
- Create a walking tour of Vine City sites and features.

Response

The NPS allows for flexibility of how tours of the King Family Home are provided, as discussed on page 14 of the site plan/EA. The NPS may consider the suggestion for the inaugural tour when the project is implemented. The NPS may consider a future walking tour of Vine City, but it would be limited to their own property and public rights-of-way such as sidewalks, parks, and other public places. Coordination with other landowners, organizations, and businesses would be required for access to non-public sites; as such, consideration of a walking tour is outside the scope of this site plan/EA.

Suggestions: Boundary Expansion

The following concern statements include suggestions offered by commenters regarding potential NPS boundary expansion related to acquisition of another property.

Concern: Future Use of Property at 240 Sunset Avenue

Two commenters provided suggestions of ways the NPS can use the adjacent property at 240 Sunset Avenue if it is acquired by the NPS in the future. Suggestions included the following:

- Use the upper floor of the house as an office for NPS staff on duty in the neighborhood.
- The ground floor should include a visitor center with space for restrooms, orientation, exhibits, movie theater, and gathering for tours of the King Family Home.
- Exhibits in this property could focus on the Vine City neighborhood, including the King family connection to the neighborhood, and the broader Vine City contributions to the American civil rights movement.

Response

As discussed on pages 46-47 of the site plan/EA, the potential future acquisition and use of the property at 240 Sunset Avenue is considered a separate future action and is not part of the proposed alternatives for the King Family Home as described in the site plan/EA. Details related to the layout and specific use of the property at 240 Sunset Avenue is dependent on a future planning process and close coordination with the West Side Future Fund. The NPS may consider these public comments during that planning process if the property is acquired from the West Side Future Fund.

Impacts: Historic Structure and Cultural Landscape

The following concern statements include concerns raised by commenters regarding potential impacts of the project on the historic structure, cultural landscape, and original furnishings.

Concern: Historic Furnishings and Artifacts

One commenter expressed concern that the site plan/EA did not consider the impacts related to the addition of historic furnishing and artifacts in the home when it is open for tours. This commenter noted that the presence of furnishings may affect the capacity and routing of visitors through the home due to the space these objects would take up in a room and the need to protect them from visitor proximity. This commenter also noted that historic furnishings and artifacts require museum standards and climate control conditions for their protection.

Response

As discussed on page 19 of the site plan/EA, a historic furnishings plan would be completed during a future project phase which would identify priority furnishings and objects to be included in the home. The historic furnishings plan would be informed by the site plan alternative selected by the NPS for implementation and would take into consideration the visitor capacity and circulation routes proposed in the selected alternative. The plan would consider the sensitivity and vulnerability of the historic furnishings, including the anticipated proximity of visitors when determining whether to use original or reproduction artifacts. The NPS would ensure that the historic furnishings and objects are maintained using museum standards, and the climate control systems throughout the home would be upgraded to ensure appropriate temperature and humidity levels.

As discussed in appendix A of the site plan/EA, the NPS would monitor damages to the historic home and its furnishings throughout operation of the King Family Home and would implement appropriate management strategies if the threshold of one incident of damage occurs. These management strategies may include rotating areas of the home used for visitor gathering, adding or increasing signage and physical barriers in the home to separate visitors from sensitive artifacts, or potentially reducing the number of visitors on a tour at one time. Furthermore, the visitor capacity of 15 people per tour was set after identifying the limiting attributes which most constrain visitor use levels in the home. The limiting attributes are the desired visitor experience and cultural resource impacts from visitor use. It is recognized that too many people in the home at one time can negatively impact both the desired visitor experience as well as the historic resources, and so the visitor capacity was set to meet the desired conditions.

Concern: Entering the Home during Inclement Weather

One commenter expressed concern regarding visitors entering the home during inclement weather with wet shoes, clothes, and umbrellas, which may result in impacts on historic materials and

furnishings. This commenter requested the NPS consider the impacts due to entering from inclement weather directly into the family room from the new exterior door proposed under Alternative C. This commenter suggested the NPS consider ways to mitigate impacts of wet shoes, clothes, and umbrellas.

Response

Potential impacts from visitors entering the home directly from inclement weather would be mitigated through a variety of methods. NPS tour guides would educate visitors during the tour orientation on appropriate places to walk through the home and to avoid touching historic materials and furnishings. Specific measures to mitigate impacts from wet shoes or umbrellas would be determined through the historic furnishings plan and interpretation plan, which may include floor coverings throughout the circulation routes and designated areas to place wet umbrellas

The NPS would monitor impacts on the historic home and furnishings through the proposed indicators and thresholds discussed on pages 15-16 and appendix A of the site plan/EA. If an incident of damage occurs, whether resulting from inclement weather or another cause, appropriate management strategies would be implemented to address the damage and prevent another similar incident. These management strategies may include rotating areas of the home used for visitor gathering, adding or increasing signage and physical barriers in the home to separate visitors from sensitive artifacts, or potentially reducing the number of visitors on a tour at one time.

Concern: Guest Room Impacts

A commenter was concerned about the impacts on the guest room in the King Family Home that would result from creating an accessible route from the side entrance through the guest room into the central hallway. This commenter asked if there are important stories regarding this room and those who stayed in it, or if there would be historic furnishings added to the room that would need protection. This commenter suggested that the significance of that room and stories told through interpretation may affect the final tour routing plan.

Response

Due to the existing floor plan of the home, an accessible route through the first floor requires some level of physical alteration of the historic home. The existing route from the side entry to the main hallway is through the kitchen, which would require substantial alteration to the layout of the historic cabinets, counters, and appliances, which are character-defining features of the kitchen (see appendix B of the site plan/EA for a list of all character-defining features). The kitchen was an important and prominent room where the family spent time together cooking and doing homework at the counter. The NPS determined that substantial alteration to the kitchen would result in unacceptable impacts the historic character of the home. As such, the NPS proposed an alternative route that required alteration to fewer and less-prominent character-defining features in order to best balance alterations to character-defining features and providing access for visitors of all abilities.

The specific interpretation of the guest room, including addition of any historic furnishings or objects would be subject to the recommendations made in the interpretation plan (referenced on page 14 of the site plan/EA) and historic furnishings plan (referenced on page 19 of the site plan/EA), both of which would be undertaken during future phases of this project. These plans would be informed by the site plan alternative selected by the NPS for implementation and would take into consideration the visitor capacity and circulation routes proposed in the selected alternative,

including the proposed new door opening and route through the guest room to create an accessible route from the side entrance to the main central hallway.

Concern: Recreation Room Impacts

A commenter expressed concern regarding the potential impacts to the basement recreation room if the NPS were to turn the room into an exhibit or film-viewing space. This commenter noted that the unique stories and features of this room should be considered when determining its interpretation and use because their importance may grow as the features become rarer and more distinctive over time.

Response

The specific interpretation of the basement rec room, including addition of any historic furnishings or objects would be subject to the recommendations made in the interpretation plan (referenced on page 14 of the site plan/EA) and historic furnishings plan (referenced on page 19 of the site plan/EA), both of which would be undertaken during future phases of this project and would be informed by the site plan alternative selected by the NPS for implementation and would take into consideration the visitor capacity and circulation routes proposed in the selected alternative. The interpretation and historic furnishings plans would also be informed by the recommendations in the historic structures report completed for the King Family Home, which includes retaining interior character-defining features of the home such as finishes, fixtures, and built-in features such as cabinets and appliances. Character-defining features of the home, including the basement rec room, are included in appendix B of the site plan/EA. Any contemporary furnishings or fixtures added to the basement rec room to create an exhibit or film-viewing space would be installed in a manner that would not damage any character-defining features and would be fully reversible if removed in the future.

Impacts: Neighborhood

The following concern statements include concerns raised by commenters regarding potential impacts of the project on the Vine City neighborhood, residents, and landowners.

Concern: Neighborhood Character and Parking

One commenter was concerned that the proposal under Alternative C of considering ways to create extra parking spaces within the Vine City neighborhood to support the King Family Home would alter the character and experience of the neighborhood, which is something that should be preserved.

Response

As discussed on page 30 of the site plan/EA, any potential boundary expansions or agreements with outside entities for development of additional parking spaces in support of the King Family Home would be subject to further consultation, coordination, and additional study, planning, design, and compliance. Impacts of these potential actions would depend on the location, size, and design of potential parking areas, and would be addressed as appropriate through additional consultation and compliance processes. The NPS would strive to develop measures to avoid, minimize, or mitigate potential impacts on the neighborhood from any future actions.

Concern: Large Groups of Visitors

A commenter expressed concern regarding the potential future public transportation options proposed under Alternative C and the impacts on the neighborhood. This commenter was concerned that more public transit connections would cause unmanageable numbers of visitors arriving in clusters to the King Family Home, which would be particularly difficult to manage with tours in progress at the home.

Response

As discussed on page 70 of the site plan/EA, opening of the King Family Home as a public site would result in an increase in number of people visiting the site and the Vine City neighborhood. While the NPS has limited management jurisdiction outside of their property boundaries, the NPS would mitigate impacts related to visitors in the neighborhood by providing information regarding hours the King Family Home is open, how to obtain tickets for tours, how to experience the home if tour tickets are not available, and information regarding typically busy period for the home in an attempt to disperse large numbers of visitors at one time. Although an increased numbers of visitors in the neighborhood is expected as a result of opening the King Family Home, these impacts would be limited to daytime hours when the site is open to visitors.

ATTACHMENT B: FINDING OF NON-IMPAIRMENT

The following provides a discussion of the Non-Impairment Determination for the *King Family Home Site Plan / Environmental Assessment*, April 2025 (site plan/EA).

THE PROHIBITION ON IMPAIRMENT OF PARK RESOURCES AND VALUES

National Park Service (NPS) *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given NPS the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the NPS must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the NPS. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

WHAT IS IMPAIRMENT?

NPS *Management Policies 2006*, section 1.4.5, “What Constitutes Impairment of Park Resources and Values,” and section 1.4.6, “What Constitutes Park Resources and Values,” provide an explanation of impairment.

Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values (NPS 2006).

Section 1.4.5 of NPS *Management Policies 2006* states:

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- identified in the park’s general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Per section 1.4.6 of NPS *Management Policies 2006*, park resources and values that may be impaired include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act unless the NPS was in some way responsible for the action.

HOW IS AN IMPAIRMENT DETERMINATION MADE?

Section 1.4.7 of NPS *Management Policies 2006*, states that

[i]n making a determination of whether there would be an impairment, an NPS decision maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969 (NEPA); consultations required under section 106 of the National Historic Preservation Act (NHPA), relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.

NPS *Management Policies 2006* defines “professional judgment” as

a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision-maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities relating to the decision.

NON-IMPAIRMENT DETERMINATION FOR THE SELECTED ACTION

This determination on impairment has been prepared for the selected action (alternative B) described in chapter 3 (pages 14-29) of the site plan/EA. A non-impairment determination is made

for all resource impact topics analyzed in detail for the selected action with the exception of visitor use and experience and socioeconomic resources because impairment findings relate back to park resources and values. Visitor use and experience and socioeconomic resources are not generally considered to be park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values.

As was documented in the site plan/EA, the selected action was found to have no impacts on archeological resources and negligible impacts on vegetation. See pages 8-9 of the site plan/EA for more information. There are currently no known archeological resources within the project area and potential impacts to unknown and intact archeological resources will be avoided or mitigated through best practices and the use of a discovery plan prepared and implemented by the NPS if archeological resources are uncovered during construction activities. Vegetation in the project area is typical of urban residential areas in Atlanta. There are no known special status species or species of special concern within the project area, and site modifications would avoid or minimize impacts by following the recommendations of the cultural landscape report. Therefore, the impacts on these resources would be low intensity, small, and insignificant. The resources will remain available to be enjoyed by current and future generations. Therefore, they will not be impaired by implementation of the Selected Action.

Based on the information provided in the site plan/EA, the NPS considered the possibility of unacceptable impacts and determined that they would not occur as a result of the selected action.

Non-Impairment Findings for Historic Structure

Protection of historic structures that tell the story of Dr. Martin Luther King, Jr.'s life and legacy is an important way for the NPS to achieve the park's mission, which is to preserve, protect, and interpret "for the benefit, inspiration, and education of present and future generations, the places where Martin Luther King, Jr. was born, lived, worked, worshiped, and is buried." The King Family Home is not only a historic structure, but it is one of the park's fundamental resources and values as documented in the 2021 update of the park's 2017 foundation document (NPS 2017 and 2021). Rehabilitation of the King Family Home will allow the NPS to protect and interpret the home where Dr. King lived and raised his family in a manner in which they cannot achieve under the current conditions due to water infiltration, deterioration of historic materials, non-compliance with current life safety code, and lack of accessibility for visitors.

Rehabilitation treatments will substantially improve the condition of the King Family Home and will be guided by a historic structure report and other treatment documents to ensure conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines. Physical alterations to the historic fabric needed to provide accessibility and code compliance are limited to areas that do not contain primary character-defining features and are generally screened from view from the front of the home or main interior living areas. These alterations are necessary to provide equal access to the home and will not diminish the overall historic character or integrity of the structure. The selected action will ensure this fundamental resource and value remains in good and stable condition to allow present and future generations of visitors to experience the home of the King Family, which supports the park's mission. Therefore, the selected action will not result in impairment to this resource.

Non-Impairment Findings for Cultural Landscape

As discussed in the site plan/EA, the landscape of the King Family Home and its setting along Sunset Avenue in the Vine City neighborhood of Atlanta contributes to the property's overall historic significance and conveys the story as a family residence. The King Family Home is one of the park's fundamental resources and values, and its cultural landscape is an important part of that resource (NPS 2017 and 2021). The cultural landscape encompasses the entirety of the King Family Home property including the front and back yards, driveway, side patio, the home itself, as well as features including vegetation, the back yard playset, shed, and views between the property and Sunset Avenue. Rehabilitation of the landscape will allow the NPS to protect and interpret the property where Dr. King lived and raised his family, which supports the park's mission, as discussed under "Non-Impairment Findings for Historic Structure" above, in a manner in which they cannot achieve under the current conditions due to drainage issues, deterioration of historic materials, non-compliance with current life safety code, and lack of accessibility for visitors.

Rehabilitation treatments will substantially improve the condition of the cultural landscape and will be guided by a CLR and other treatment documents to ensure conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines. Physical alterations to the landscape needed to provide accessibility are limited to areas that do not contain primary character-defining features and are generally screened from view from public areas such as the sidewalk and road. These alterations are necessary to provide equal access to the site and will not diminish the overall historic character or integrity of the landscape. The selected action will ensure this fundamental resource and value remains in good and stable condition to allow present and future generations of visitors to experience the home of the King Family, which supports the park's mission. Therefore, the selected action will not result in impairment to this resource.

CONCLUSION

The NPS has determined that implementation of the selected action will not constitute an impairment of the resources or values of the park. This conclusion is based on consideration of the park's purpose and significance; a thorough analysis of the environmental impacts described in the Site Plan/EA, comments provided by the public and other agencies, and the professional judgment of the decision maker guided by the direction of NPS *Management Policies 2006*.

REFERENCES

- US Department of the Interior, National Park Service (NPS)
2006 *Management Policies*. US Department of the Interior, National Park Service, Washington, DC. https://www.nps.gov/policy/MP_2006.pdf.
- 2017 Foundation Document, Martin Luther King, Jr. National Historic Site. US Department of Interior, National Park Service.
- 2021 Foundation Document Update, Martin Luther King, Jr. National Historical Park, Georgia. US Department of Interior, National Park Service.