

DRAFT ENVIRONMENTAL ASSESSMENT
To Address the Damaged Kit Carson Monument
Santa Fe, New Mexico

November 2024



Prepared by the:



U.S. General Services Administration
Greater Southwest Region (Region 7)

Public Buildings Service
819 Taylor Street
Fort Worth, Texas 76102

Table of Contents

1.0 PURPOSE AND NEED	2
1.1 Introduction.....	3
Figure 1, aerial map and site plan of the Federal Oval.....	4
Figure 2, image showing damages and deterioration.....	5
1.2 Purpose and Need for the Proposed Action.....	7
1.3 Relevant Environmental Laws, Regulations, and Executive Orders.....	7
Table 1-1. Relevant Laws and Regulations.....	8
1.4 Public Involvement.....	9
Table 1-2. Commenters and Comments by Category.....	13
2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES	14
2.1 Proposed Action.....	14
2.1 Overview of the Proposed Action.....	14
2.2 Alternatives Development and Evaluation Process.....	16
Figure 3, image showing No Action Alternative.....	19
Figure 4, image showing Alternative 2: Retain Existing with Interpretation.....	20
Figure 5, image showing Alternative 4b: Removal and Discard.....	21
Figure 6: Photograph of two sides of the monument, reflecting its current general appearance.....	22
2.3 Alternatives Considered but Eliminated from Further Study: Option 3: Relocate Monument for Public Display.....	22
3.0 AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS	24
3.1 Resources Screened from Detailed Analysis.....	25
Table 3.1-1. Resources Dismissed from Further Analysis within this EA.....	25
3.2 Urban Design & Visual Resources.....	28
Figure 7. Aerial image depicting urban design elements of the Federal Oval, highlighting pedestrian and vehicular circulation, activity areas, and view targets and corridors.....	30
3.3 Cultural Resources.....	32
Table 3.4.1. Components of the Federal Oval.....	34
4.0 CUMULATIVE IMPACTS	36
4.1 Reasonably Foreseeable Projects.....	36
4.2 Cumulative Impacts.....	38
5.0 CONCLUSIONS AND RECOMMENDATIONS	39
6.0 ACRONYMS AND ABBREVIATIONS	39
7.0 LIST OF PREPARERS	41
APPENDIX A: SITE DOCUMENTATION & FEDERAL OVAL CONTEXT	see attached
APPENDIX B: SECTION 106 AND NHPA DOCUMENTATION	see attached
APPENDIX C: KIT CARSON MONUMENT CONDITION ASSESSMENT REPORT see attached	
APPENDIX D: RESOURCE DOCUMENTATION	see attached

1.0 PURPOSE AND NEED

This environmental assessment (EA) has been prepared in accordance with Section 102 of the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 to 4370d), as implemented by the regulations promulgated by the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] §1500-1508). The principal objectives of NEPA are to ensure the careful consideration of environmental aspects of proposed actions in federal decision-making processes and to make environmental information available to decision makers and the public before decisions are made and actions are taken. Additionally, this EA has been prepared in accordance with GSA NEPA guidelines (GSA Order ADM 1095.1F and the Public Buildings Service [PBS] NEPA Desk Guide, both dated October 1999) and serves as a mechanism for compliance with the National Historic Preservation Act (NHPA) of 1966 (as amended) and other relevant laws and/or regulations.

An EA is done to determine whether or not an action is a "major federal action significantly affecting the quality of the human environment." The CEQ regulations contain a substantial definition of what it means to have a "significant" impact. An EA leads either to the decision to do an Environmental Impact Statement (EIS) or to a Finding of No Significant Impact (FONSI). The CEQ regulations (§1508.27) define the word "significantly" as used when the Act refers to "major Federal action significantly affecting the quality of the human environment." Since it is such actions that require preparation of an EIS, the definition of "significantly" indicates how the significance of impacts should be measured in an EA. If the effects are not significant when measured against the definition, then a FONSI can be issued and the project proceeds with no further NEPA review. If the definition is met, then an EIS is needed. The definition of significantly is framed in terms of "context" and "intensity:"

Context - means the geographic, social, and environmental contexts within which the project may have effects (either short- or long-term in nature). The regulations refer to: (1) society as a whole, defined as including all human society and the society of the nation, (2) the affected region, (3) affected interests, such as those of a community, Native American tribe, or other group, and (4) the immediate locality.

Intensity - is the severity of the potential impact considered in context. The regulations direct agencies to consider: (1) both beneficial and adverse impacts, (2) impacts on human health and safety, and (3) impacts on an area's unique characteristics, such as historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, and ecologically critical areas.

In accordance with CEQ regulations (§1502.13), this section of the EA briefly specifies the underlying purpose and need to which the GSA is responding in proposing the alternatives for implementing the proposed action.

1.1 Introduction

The mission of the General Services Administration (GSA) is to provide stewardship of the way the government uses and provides real estate, acquisition services, and technology. GSA's Public Buildings Service (PBS) assists federal agency customers housed in GSA owned and leased facilities with their current and future workplace needs based on their specific mission requirements. This includes the design, construction, management, maintenance, custody, and control of federal buildings, including conditions at federal courthouses.

The purpose and need for this EA is for GSA to address the existing, damaged and deteriorated condition of a monument under the custody and control of GSA in a publicly accessible space honoring a controversial historic figure.

Christopher "Kit" Carson, for whom the monument was erected, was known as a frontiersman, expedition guide, U.S. Indian agent, and U.S. Army officer during the Civil War. He is also remembered as an instrument of the government's policy to remove Native American tribes from their homelands in Arizona and New Mexico territory. During his military service, Carson led forces against several tribes, including the Navajo (Diné) and Mescalero Apache. This campaign and others like it were part of a period in American history during which federal policies and resulting actions towards indigenous communities were fraught with aggression, broken agreements, and the displacement of these groups from their ancestral lands.

The Kit Carson Monument is located in the Federal Oval in Santa Fe, New Mexico, on the south side of the Santiago E. Campos U.S. Courthouse at 106 South Federal Place (Figure 1). The Campos U.S. Courthouse, listed in 1973 in the National Register of Historic Places (NRHP) (NR 73001152) and the New Mexico State Register of Cultural Properties (SR 244), is an active federal courthouse, serving the U.S. District Court for the District of New Mexico. The monument was donated and installed by the Grand Army of the Republic (GAR) in 1885 on the grounds of the Federal Oval. The successor organization to the GAR, the Sons of Union Veterans of the Civil War (SUVCW) donated the monument to GSA without restrictions in September 2023.

In the past four years, the monument has been a repeated target of vandalism and received significant local attention. During the summer of 2020, following public protests and repeated graffiti on the monument, a local request was made for the GSA to remove the monument, citing the complex and controversial legacy of Kit Carson. In response to these protests and to ensure public safety, GSA installed a protective plywood barrier around the monument. Following the installation of the box, multiple episodes of graffiti continued to take place. On August 31, 2023, the monument was substantially damaged with the removal of the top three (3) obelisk sandstone blocks, and damage to the sandstone cornice and blocks below (Figure 2). Damaged portions of the obelisk, reduced to large and small pieces of rubble, have been safeguarded in storage.



Figure 1, aerial map and site plan of the Federal Oval.

Conditions at and around the Kit Carson Monument necessitate intervention and a response from GSA in order to bring the property back into compliance with PBS and court standards (Figure 2). [The Facilities Standards for the Public Buildings Service \(P100\)](#) establishes mandatory standards and criteria for its owned inventory. The P100 states that facility designs must consider expected use and unintended use by visitors and the public and be designed to eliminate or mitigate injury to such parties and liability to GSA, and to minimize susceptibility to property damage and loss; they should also consider local context and community planning efforts. The U.S. Courts Design Guide, as amended in 2008 and 2016 ([Judicial Conference of the United States 2021](#)), states that a court facility should provide a civic presence and express solemnity, integrity, rigor, and fairness, as well as invoking a sense of permanence. The existing conditions of the monument on the Federal Oval do not meet the spirit of the guidance described above.



Figure 2, image showing damages and deterioration.

In March 2018, the Advisory Council on Historic Preservation (ACHP), an independent federal agency created by the National Historic Preservation Act (NHPA) of 1966, to promote the preservation, enhancement, and sustainable use of our nation's diverse historic resources, and to advise the President and the Congress on national historic preservation policy, issued a [policy statement](#) to assist federal, state, and local government entities facing decisions about the management or disposition of controversial commemorative works (ACHP, March 2018). This includes federal agencies complying with the review requirements of Section 106 of the NHPA (54 U.S.C § 306108). In addition to reiterating agency requirements under the NHPA, the

guidance adds that management decisions related to controversial monuments must necessarily take into account the views and needs of the contemporary community, including changing values as they relate to historical figures.

In developing the Proposed Action and-alternatives—including considerations of the P100, court requirements, and policies on controversial commemorative works—the GSA conducted research and preliminary consultations with key stakeholders to address conditions at the Kit Carson Monument site. Primary consulting parties included the New Mexico State Historic Preservation Officer (SHPO), [Federally recognized tribes](#), historical organizations, local government representatives, and the Office of the Tribal Liaison at the New Mexico Department of Cultural Affairs. The consultations with Tribal governments encompassed those with historical or cultural ties to the Federal Oval or New Mexico, as well as those expressing concerns about the Kit Carson Monument. These discussions were conducted on a government-to-government basis.

From December 2023 through July 2024, GSA held four meetings to gather input from tribes and consulting parties on potential treatments for the monument. Public feedback was also invited via a virtual meeting and a Kit Carson Monument website created for information sharing. Additionally, GSA commissioned two studies to guide the development of options considered in this assessment: the Cultural Resources Documentation of the Federal Oval and a Monument Condition Assessment. The Cultural Resources Documentation of the Federal Oval reviewed and compiled existing research and site documentation, including pre-history. A summary of this report is provided in Appendix A. The Condition Assessment evaluated the monument's current physical state and assessed the feasibility of repair, relocation, and other alternatives, as outlined below. The Condition Assessment is included as Appendix C.

Based on an evaluation of the monument's physical condition, GSA has determined that the monument no longer meets the criteria for inclusion as a contributing resource to the historic context of the Federal Oval. As detailed in Appendix B, the Section 106 review record and determination submitted to the New Mexico State Preservation Office, the Kit Carson Monument has suffered an irretrievable loss of integrity due to the previously mentioned damage, and it can no longer convey its historic significance. The SHPO concurs with this assessment, and as a result, the removal of the Kit Carson Monument—identified as the Preferred Alternative—is considered a viable option.

As previously stated, GSA has prepared this Draft EA for the purpose of analyzing the potential environmental impacts resulting from the Proposed Action and the identified alternatives. GSA has prepared this Draft EA in accordance with the following, among other relevant federal and state laws and regulations (see Section 1.3, Relevant Environmental Laws, Regulations, and Executive Orders):

- NEPA (42 United States Code [U.S.C.] 4321 et seq.)
- The Council on Environmental Quality (CEQ) regulations implementing NEPA (Title 40 Code of Federal Regulations Parts 1500-1508 [40 CFR 1500-1508]), and
- GSA NEPA Desk Guide (GSA 1999).

The principal objectives of NEPA are to ensure the careful consideration of environmental aspects of proposed actions in Federal decision-making processes and to make environmental information available to decision makers and the public before decisions are made and actions are taken.

1.2 Purpose and Need for the Proposed Action

The purpose of the Proposed Action is for GSA to address the existing, damaged and deteriorated condition of a monument under the custody and control of GSA in a publicly accessible space in front of a historic federal courthouse. GSA seeks to address damage to the monument in a culturally sensitive manner, while ensuring that the entrance area to the U.S. Courthouse meets GSA standards for public buildings as defined in the P-100, including standards for safety, and serves the needs of the Judiciary and requirements of the U.S. Courts. A recent condition assessment has determined that the Kit Carson Monument is degraded to the point of being unstable and presents a potential risk to the public if the monument is left unprotected without the plywood barrier.

Implementation of the Proposed Action is necessary due to the significant damage to the monument, along with identified deficiencies at the Federal Oval, and concerns related to public safety. This aligns with GSA's mission to provide financially and environmentally sustainable, accessible, and responsive workspace solutions that support a productive federal workforce.

1.3 Relevant Environmental Laws, Regulations, and Executive Orders

1.3.1 National Environmental Policy Act (NEPA) and NEPA Process

NEPA requires federal agencies to consider the potential impacts to the natural and human environment from their proposed actions. If potential adverse effects may arise, they must be disclosed in an EA or an Environmental Impact Statement (EIS) that is circulated for public review. The NEPA process is intended to help federal agency officials make decisions based on an understanding of the potential environmental effects and to take actions that protect, restore, and enhance the environment (40 CFR 1500.1). Therefore, GSA, with input from the public, tribes, and other federal and state agencies, would decide the future action to take in accordance with NEPA as part of their decision-making process. Federal agencies are required to provide meaningful opportunities for public participation in a proposed action. Opportunities for stakeholders and the public to become involved in the NEPA process occur when an agency begins scoping and when a NEPA document is published for public review and comment. Please refer to Section 1.4, Public Involvement, for detailed information concerning internal and external scoping during the NEPA process.

1.3.2 Section 106 of the National Historic Preservation Act (NHPA)

The National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. 470), as amended, is the primary federal law for protecting cultural resources. It establishes a national preservation program for historic properties, including districts, sites, buildings, structures, and objects. Section 106 of the NHPA requires federal agencies to consider the effects of their actions on such properties, with implementing regulations outlined in 36 CFR 800 (Protection of Historic Properties). Under these regulations, the responsible federal agency, in consultation with the State or Tribal Historic Preservation Officer (SHPO/THPO), must identify significant cultural resources within the Area of Potential Effect (APE), assess the effects of proposed undertakings on these resources, and, if needed, mitigate adverse effects. The APE for the proposed action was identified as the immediate property where the monument is located (facing S. Federal Place and Lincoln Avenue) at the Campos U.S. Courthouse and the surrounding views to/from the monument. Primary consulting parties in the Section 106 process included the New Mexico SHPO, [Federally recognized tribes](#), relevant historical organizations, local government representatives, and the Office of the Tribal Liaison at the New Mexico Department of Cultural Affairs. The Tribal governments and their historic preservation representatives consulted included those with historical or cultural interests in the Federal Oval or New Mexico, and those with concerns regarding the Kit Carson Monument.

In accordance with 36 CFR 800, federal agencies are encouraged to coordinate studies and documentation prepared under Section 106 with those conducted under NEPA. Section 800.8(a) offers guidance on coordinating the NEPA and Section 106 processes, and GSA adhered to the consultation, identification, and documentation standards set out in 36 CFR 800.8(c). Additional details on the Section 106 process conducted for this Draft EA are provided in Section 3.7, Cultural Resources and in Appendix B.

1.3.4 Other Relevant Laws and Regulations

Table 1-1 provides a list of potentially relevant laws and regulations with which GSA must comply as part of the project planning and NEPA processes.

Table 1-1. Relevant Laws and Regulations

Statutes
Archaeological Resources Protection Act of 1979 (16 U.S.C. § 470aa-mm)
Clean Air Act of 1970 as amended (42 U.S.C. § 7401, et seq.)
Clean Water Act of 1977 as amended (33 U.S.C. § 1251, et seq.)
Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9601, et seq.)
Endangered Species Act of 1973 (16 U.S.C. § 1531-1544)

Energy Independence and Security Act (42 U.S.C. § 17001, et seq.)
National Energy Conservation Policy Act (42 U.S.C. § 8231, et seq.)
National Historic Preservation Act of 1966 (54 U.S.C. § 300101 et seq.) (89 Public Law 665 (1966))
Resource Conservation and Recovery Act of 1976 (42 U.S.C. § 6901, et seq.)
Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. §§ 3001 et seq.)
Regulations
32 CFR 229 – Protection of Archaeological Resources: Uniform Regulations
33 CFR 320-330 –U.S. Army Corps of Engineers Regulations
36 CFR 800 – Protection of Historic Properties
40 CFR 300-399 –Hazardous Substance Regulations
40 CFR 6, 51, and 93 –Conformity of General Federal Actions to State or Federal Implementation Plans
43 CFR 10 —The Native American Graves Protection and Repatriation Act Regulations
Executive Orders
EO 11593 –Protection and Enhancement of the Cultural Environment
EO 11988 –Floodplain Management
EO 11990 –Protection of Wetlands
EO 12898 –Environmental Justice
EO 13007 –Indian Sacred Sites
EO 13175 –Indian Trust Resources
EO 13287 –Preserve America
EO 13327 –Federal Real Property Asset Management
EO 13589 –Promoting Efficient Spending
EO 14008 –Tackling the Climate Crisis at Home and Abroad

1.4 Public Involvement

The NEPA process provides several opportunities for public involvement to include public scoping and a public comment period following publication of the Draft EA. During each opportunity for public involvement, interested and affected parties (i.e., stakeholders) may express their concerns and provide their views about:

- The project and its possible impacts on the natural and human environment;

- What should be addressed in the analysis and evaluation of the Proposed Action; and
- The adequacy of the NEPA analysis and documentation of potential impacts in the EA.

Public participation with respect to decision-making on the Proposed Action is guided by GSA's implementing procedures for compliance with NEPA (GSA Order ADM 1095.1F, Environmental Considerations in Decision Making) and the GSA NEPA Desk Guide (GSA 1999). GSA considered comments from interested and affected parties in the preparation of this Draft EA.

1.4.1 Scoping and Public Involvement

Scoping is an early and open process for determining the scope of issues to be addressed and for identifying potentially significant issues related to a proposed action. GSA's scoping process included the following steps:

- Identifying the purpose of and need for the project;
- Defining the Proposed Action;
- Determining the environmental issues potentially required for detailed analysis;
- Eliminating issues that are out of scope of the project;
- Listing data needs, identifying cumulative actions; and
- Confirming the appropriate NEPA path.

1.4.2 Initial Tribal Outreach & Consulting Parties

Given the sensitive nature of the Kit Carson Monument and its location in downtown Santa Fe—a historically and culturally rich area with longstanding connections to multiple Pueblos and tribes— GSA recognized the importance of consulting early in this process with [federally recognized tribes with interests in the state](#). Other consulting parties include the New Mexico SHPO, the City of Santa Fe, the Historic Santa Fe Foundation, the Santa Fe Trail Association (End of the Trail Chapter), the Old Santa Fe Association, the Kit Carson House & Museum, and additional identified stakeholders.

GSA sought to engage in meaningful dialogue with these stakeholders to gather their perspectives and collaboratively develop approaches for the future treatment of the Kit Carson Monument in Santa Fe, NM, while upholding respectful government-to-government relations with sovereign Native Nations.

The following are actions that were undertaken by GSA to engage with Tribal governments and other consulting parties regarding the Kit Carson Monument:

1.4.2.1 Tribal Listening Sessions (1 & 2):

- a. Purpose: After the transfer of the monument from SUVCW to GSA in September 2023, the agency began government-to-government listening sessions and consultations with [Federally recognized tribes](#) who have an ancestral connection in New Mexico. These meetings were conducted as preliminary discussions with Federally recognized tribes prior to the initiation of Section 106 due to the sensitive nature and history of the monument, and the necessity for early

government-to-government communication. Goals for the listening sessions included soliciting input on the future treatment, care and management of the monument and site.

- b. **Timing & Location:** An initial in-person meeting was held on December 12, 2023, in Albuquerque at the Indian Pueblo Cultural Center with Federally recognized tribes and representatives from the All Pueblo Council of Governors. This was followed by a virtual meeting on Jan 31, 2024. The in-person meeting was advertised 30 days prior to the date selected to give participants adequate notice to respond.
- c. **Participants:** Representatives from GSA's regional senior leadership and national and regional historic preservation office conducted listening sessions and consultation with identified tribes.
- d. **Outcomes:** Sessions included discussion of the future of the monument itself, as well as discussion of the historic legacy of Kit Carson generally and the visibility of indigenous history on public land in Santa Fe.
- e. **Meeting Documentation:** Meeting notes from each tribal listening session were made available to participants, as well as copies of the informational powerpoint on the history of the monument presented by GSA in the listening sessions. Documents were disseminated among participants for review by email.

1.4.2.2 Section 106 Consulting Party Meetings:

- a. **Purpose:** After comments from initial tribal listening sessions were considered, GSA conducted a meeting to formally initiate Section 106 consultation to comply with 36 CFR 800. Two additional meetings were held. The parties invited included those listed previously in 1.4.2.
- b. **Timing & Location:** Virtual meetings took place on May 9, 2024, July 18, 2024 (public also invited), and October 30, 2024. The meetings were noticed 15 days prior to the date selected to give participants adequate time to respond by paper mail and email.
- c. **Participants:** Representatives from GSA's regional senior leadership and national and regional historic preservation office conducted the Section 106 kickoff meeting. Participants included local and state partners (City of Santa Fe, the NM SHPO), those tribes that requested to remain consulting parties in the previous government-to-government listening sessions, and historical organizations. The two meetings were led by GSA's historic preservation staff.
- d. **Outcomes:** The meeting with the consulting parties resulted in a preliminary list of possible actions or outcomes for the monument. Suggested treatments for the monument included reinterpretation, relocation, storage, or a combination of multiple approaches.
- e. **Meeting Documentation:** Meeting notes and/or recorded videos were made available to participants, as well as copies of the informational powerpoint on the history of the monument presented by GSA in the listening sessions and Section 106 Initial Consulting Party Meeting. GSA subsequently finalized the Section 106 process, which is addressed in Section 3.3 below, and in Appendix B

1.4.3 Public Engagement Activities

After the Tribal Listening Session and the first Section 106 meeting, GSA notified the public and

all interested stakeholders about the Proposed Action and solicited comments on the project and potential environmental issues. The following were actions undertaken by GSA to engage with the public regarding the Kit Carson Monument:

1.4.3.1 Public Web Site:

- a. Purpose: GSA developed and launched a [public website](#) with information about the monument and a place to provide public comments. The purpose is to allow the public to email comments to GSA during the public participation process and receive ongoing updates on the status and development of any proposed actions. The web site officially launched on May 24, 2024, and has been updated with project milestones as they occur. A QR code with the web site link was posted onsite on the plywood box protecting the monument.

1.4.3.2 Public Meeting: Introduction and Review of Potential Actions

- b. Purpose: GSA conducted a public meeting to solicit public comments on potential federal actions related to the Kit Carson Monument. The public meeting was also advertised to the consulting parties. GSA shared an informational powerpoint on the history of the monument and actions under consideration for the treatment of the monument. These options were developed in response to comments from the tribal listening sessions and the initial Section 106 consulting parties meeting. They are as follows:
 - i. No action (retain onsite in its current state, covered and protected)
 - ii. Retain all or portions onsite with interpretation while removing the barrier and tarp
 - iii. Relocate the monument for public display at another outdoor publicly accessible venue or inside a building
 - iv. Disassembly and storage
 - v. Restoration in place

Please note that items ii-v (all actions besides the “no action” alternative) as discussed in the public meeting, do not preclude additional and related interventions, such as new site interpretation, in the future.

- c. Timing and Location: A virtual meeting was held on July 18, 2024. The meeting was advertised on the [public website](#) and on a paper flier. The flier had a scannable QR code that was linked to the website. The flier was posted to the plywood box protecting the monument a minimum of 7 days prior to the date selected to give participants adequate notice to respond. Participants from previous meetings were also emailed an invitation, which was available for further distribution to any additional interested parties.
- d. Participants: Participants included representatives from GSA’s regional senior leadership and national and regional historic preservation office. Also present were local and state partners (City of Santa Fe, the NM SHPO), historical organizations, and those tribes that requested to remain consulting parties in the previous government-to-government listening sessions.

- e. Outcomes: Participants reviewed the proposed alternatives, asked questions about the range and combination of options, as well as timing and feasibility of execution. One of the consulting historical organizations made a statement in support of the monument remaining on site, see statement below. Participants were also advised that they will have 30 days from the date of this meeting to send comments to the Kit Carson email on the [public website](#).
- f. Meeting Documentation: The Zoom meeting was recorded and was posted to the Kit Carson [public website](#) for participants and the public to review.

Most of the attendees to the July 18th meeting did not share formal comments. However, one of the consulting parties cited the following statement in their remarks:

“The Board of the End of the Trail Chapter of the Santa Fe Trail Association prioritizes efforts to repair and restore the Kit Carson Monument on its location on the grounds of the Santiago E. Campos U.S. Courthouse in Santa Fe. If this solution is not possible for reasons of security and safety, then other options for the monument should be considered including moving the monument to Santa Fe's National Cemetery.”

A total of three unique commenters provided input during the initial public scoping period. These comments were emailed to the Kit Carson project email. A summary of the three comments received is provided in Table 1-2, with the majority of comments received concerning the legacy of Kit Carson and the future treatment of the monument.

Table 1-2. Commenters and Comments by Category

Issues or Concerns	Addressed in Particular Section of the Draft EA	Remarks
Treatment of Monument; Historical Context; Future Location of Monument	Section 1.4 Public Involvement; Section 3.2 Urban Design & Visual Resources; Section 3.3 Cultural Resources	Commenter expressed that the Kit Carson Monument is inappropriate in its current location and suggested that the land be given to Tewa speaking tribes and allow the tribes to make a disposition decision on the monument.
Treatment of Monument; Interpretation	Section 1.4 Public Involvement; Section 3.2 Urban Design & Visual Resources; Section 3.3 Cultural Resources	Commenter suggested replacing the monument with a plaque explaining where the monument was relocated to and displaying the monument in a museum.
Treatment of Monument; Historical Context	Section 1.4 Public Involvement; Section 3.2 Urban Design & Visual Resources; Section 3.3 Cultural Resources	Commenter noted that while Kit Carson is a significant figure in the west, he also displaced and caused the deaths of many indigenous people, and therefore the monument should be moved off of federal property and to a museum or private institution.

GSA used the results of the scoping efforts to further define the scope and areas of emphasis (or focus) of this Draft EA. Consultation-related correspondence, including the notice requesting public comment, is provided in Appendix E.

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

This chapter of the EA describes the proposed action and the alternatives developed by GSA to satisfy the purpose and need for action described in Chapter 1. This section also describes the process used to objectively identify and evaluate the reasonable alternatives carried forward for detailed analysis, as well as the reasoning for elimination of any alternatives.

2.1 Proposed Action

The purpose of the Proposed Action is for GSA to address the damaged and deteriorated condition of a monument under the custody and control of GSA in a publicly accessible space outside of a historic federal courthouse. GSA seeks to address damages to the monument in a culturally sensitive manner while ensuring that the entrance to the Campos U.S. Courthouse meets the needs of the Judiciary and requirements of the U.S. Courts. Implementation of the Proposed Action is needed in light of the damages to the monument and the related and identified site deficiencies at the Federal Oval, as consistent with GSA's mission to create financially and environmentally sustainable, accessible, and responsive workspace solutions that enable a productive federal workforce.

2.1 Overview of the Proposed Action

During the summer of 2020, following public protests and repeated graffiti on the monument, a local request was made for the GSA to remove it, citing the complex and controversial legacy of Kit Carson. In response to these protests and to ensure public safety, GSA installed a protective plywood barrier around the monument. Following the installation of the box through 2023, multiple episodes of graffiti took place. On August 31, 2023, the monument suffered substantial damage due to an [incident of vandalism](#), which resulted in the removal of the top three sandstone obelisk blocks and damage to the sandstone cornice. Damaged portions of the obelisk, reduced to large and small pieces of rubble, have been safeguarded in storage. While the monument base and components are currently secured in the box, the monument has been permanently altered.

GSA's proposed Action is to address the current conditions around the monument, which are not consistent with several standards in the P-100. In the realm of Safety and Risk Reduction, the P-100 requires that facility designs consider expected use and unintended use by visitors and the public and be designed to eliminate or mitigate injury to such parties and liability to GSA. In the monument's current state (in fragments and protected from the public by a plywood wall and under video surveillance) it attracts unsafe attention; conditions need to be modified to

reduce potential harm to the public and liability to GSA at this location. The P-100 also states that facilities should be designed to minimize susceptibility to property damage, which can include fire or water damage, but in this case also include damage sustained through repeated acts of vandalism. The pedestrian area outside of the Campos U.S. Courthouse where the monument is located now includes additional security (in the form of a stationary security camera) but this may be insufficient to protect against future attacks. GSA remains concerned about the safety of visitors to the Federal Oval in light of ongoing conflict related to the monument.

In the chapter on Community Planning, the P-100 also contains guidance related to projects that will have a significant impact on the public realm (e.g., landscape, facades, perimeter security). As the steward of public buildings, GSA must consider the public and its tenants' needs in not only the design of interior spaces, but also the exterior of the building, where the federal property ends and the public right of way begins. Chapter 2 of the P-100 notes that GSA has the responsibility to leverage its federal real estate actions in ways that support local community planning goals, and advance regional economic and sustainability objectives while also meeting client agency needs, wherever possible. To meet this responsibility, the project team must understand local stakeholders, plans, and conditions, and effectively solicit local stakeholder input during the design and stewardship process and incorporate that feedback into its work.

While the NEPA process already requires creating opportunities for the public and local community to comment on proposed actions by federal agencies, it is worth reiterating here that GSA has a particular mandate in the P-100 to heavily consider local context and to design for "maximum potential public use." The Federal Oval is a highly visible and public site within the context of downtown Santa Fe; changes to the space are therefore highly impactful to the broader local community. As has been previously documented, GSA has heard from Tribal Historic Preservation Officers, tribal leaders, Santa Fe city leadership and local citizens that the presence of the Kit Carson Monument on the Federal Oval, even prior to recent acts of vandalism, has contributed to a climate of local discomfort and conflict that has only increased over time, and should be acknowledged and addressed. GSA standards in the P-100 mandate making a good-faith effort to create inviting public spaces at the gateways of our federal facilities.

In 2018, the Advisory Council on Historic Preservation (ACHP) issued a policy statement on controversial commemorative works. The policy set forth a set of guiding principles meant to assist local, state, and federal agencies about the management or disposition of controversial commemorative works. This includes federal agencies complying with the review requirements of Section 106 of the NHPA (54 U.S.C § 306108). The policy specifically identifies memorials to early European explorers, colonists, and religious leaders, who are viewed by many, including Native American communities, and others as representing the subjugation and genocide of indigenous peoples in the New World, as objects in need of special circumstantial consideration, reinterpretation, and at times, intervention. The Kit Carson Monument falls into this category of commemorative object.

Kit Carson, a frontiersman, expedition guide, U.S. Indian agent, and Army officer, led scorched-earth campaigns against tribes like the Navajo (Diné) and Mescalero Apache. These actions reflected a broader era of federal policies marked by aggression, broken treaties, and the displacement of Indigenous peoples from their ancestral lands.

In keeping with the ACHP's guidance and GSA policy and guidance to take into account the views and needs of the contemporary community and to balance stewardship responsibilities for publicly-owned commemorative works with recognition of the sensibilities, cultural responses, and emotions over memorialization and remembrance of difficult chapters in the nation's history, GSA is obligated to address historical and community concerns at the Federal Oval as related to the Kit Carson Monument. GSA will address the deficiencies, concerns, and issues listed above to improve the on site conditions and propose a permanent solution for the monument through its Proposed Action.

2.2 Alternatives Development and Evaluation Process

As previously mentioned, GSA subsequently held listening sessions and consulting party meetings to solicit suggestions on the future treatment of the monument. By July of 2024, suggestions for fulfilling the Proposed Action through a variety of means were considered and further developed into the alternatives listed below. The initial advantages and disadvantages discussed for each alternative are included, and further elaboration is made in Section 3 (Affected Environment) and Section 4 (Cumulative Impacts).

The following treatment options for the monument were evaluated by GSA based on discussions and comments from initial scoping meetings, consultations under Section 106 of the NHPA, and the review of the monument's condition assessment (Appendix C). The list of revised options is as follows:

1. Status Quo (no action alternative, as described in 2.2.1)
2. Retain all portions on site, with Interpretation (including removal of barrier and tarp, as described in 2.2.2.)
3. Relocation of the monument: Relocation of the entire sandstone portion (to various locations with interpretation, as described in 2.3)
 - 4a. Disassembly, Removal, and Storage (retention of the limestone base, removal and storage of salvaged sandstone, as described in 2.3).
 - 4b. Removal and Discard (retention of limestone base; disposal of sandstone elements, as described in 2.2.3).
5. Restoration of the monument (as described in 2.3).

The remainder of Section 2.2 identifies those alternatives that were carried forward for further analysis. It also includes a discussion of the Preferred Alternative and other Alternatives that would meet the Proposed Action. Please see conceptual illustrations of the Proposed Action Alternatives and No Action Alternatives at the end of this section (starting with Figure 3). Section 2.3 discusses those alternatives that were considered but not carried forward once they were

determined infeasible.

2.2.1 Alternative 1: No Action Alternative

- Description: The No Action Alternative (Option 1) is included and analyzed in this EA to provide a baseline for comparison with impacts from the Proposed Action as well as satisfying federal requirements for analyzing “no action” under NEPA (40 CFR 1502.14(d)). Under the No Action Alternative, GSA would not address current existing conditions of the Kit Carson Monument and would not make any changes to the site, the damaged obelisk, the interpretation, or the current temporary protection (plywood box). GSA would leave the damaged monument in its current state and would not repair, relocate, or add interpretation (Figure 3). In other words, the existing conditions would remain. The ongoing deficiencies of the public area in front of the Campos U.S. Courthouse related to safety, security, and public space would continue and would not sufficiently meet the needs of GSA, the U.S. District Court for the District of New Mexico, the general visiting public, and the overall community of Santa Fe. For additional photos of the existing conditions of the monument (i.e., conditions that would persist under a No Action Alternative) please see the Condition Assessment in Appendix C.

2.2.2 Alternative 2: Retain all or Portions On-site, with Interpretation

- Description: GSA would retain all or portions of the damaged monument onsite with no repairs to the monument (Figure 4). The tarp and security barriers would be removed, such that the monument is again visible. Appropriate interpretation would be added to the site, either directly to the monument or within the vicinity of it. Interpretation design and text would be developed in partnership with consulting parties and local stakeholders.
- Advantages: The Federal Oval benefits from a public engagement and education perspective from new and/or additional site interpretation, which would provide additional information to visitors about the history of the site, including pre-colonial history. Retention of the limestone foundation will also avoid disturbance of an archaeologically sensitive site.
- Disadvantages: Depending on how much of the monument remains and its treatment, past experience has demonstrated that security and public safety will remain a challenge. Removal of the temporary protection will make it difficult to secure the monument from continued vandalism. Additionally, the condition of the sandstone components also creates a public safety hazard if anyone were to climb on or topple the remaining portions of the monument.

2.2.3 Alternative 4b: Removal & Discard

- Description: GSA would disassemble and discard the damaged monument and remove the sandstone components from the site, which includes the remains of the obelisk portion, the cornice, and two courses of sandstone block, one of which bears the

monument's inscription to Kit Carson. The limestone foundation (bottom steps at the base, below the sandstone blocks) would be left in place and remain on site. See Figure 5.

- **Advantages:** The removal of the damaged monument will significantly enhance safety and reduce security concerns, an option supported by public comments and government-to-government consultation meetings. Ongoing vandalism tied to the monument on federal property continues to disrupt government operations and incurs substantial costs. By removing the damaged portions, the likelihood of future graffiti and attempts to topple the remaining portions of the sandstone obelisk will be greatly reduced, preventing further property damage, unnecessary expenditure of tax dollars intended for the maintenance of federal facilities, and addressing public safety risks.
- **Disadvantages:** Depending on how the former monument site is handled, urban design of the site may be affected, due to the further reduction in height of the object. Those members of the public interested in the monument would not have access to the monument (in its current form) if all the damaged sections were removed.

2.2.4 Preferred Alternative

In the process of engaging with tribal and local community members and groups, GSA has become aware that there is strong local support for a site intervention that removes reference to Kit Carson and the damaged remains of the monument entirely (See tribal public engagement record, Section 1.4). After these initial discussions with participating consulting parties and receiving the Condition Assessment Report and NM SHPO concurrence regarding lack of integrity, Option 4b, Disassembly and discard damaged sections emerged as the Preferred Alternative. GSA proposes to remove the Kit Carson Monument from its current location on the Federal Oval, retaining only the limestone foundation in place (Figure 5).

There are several additional reasons why Alternative 4b has emerged as the Preferred Alternative. First, while part of the monument (in the form of the limestone foundation) will remain, it will be limited in scope, not referencing Carson, and is the portion originally donated by the citizens of Santa Fe. Retaining the limestone foundation will also protect an archaeologically sensitive area, avoiding the potential disruption of buried cultural resources. This balanced approach preserves less offensive historical elements while safeguarding against adverse impacts and ensuring responsible stewardship of government property. Second, it also demonstrates a culturally sensitive response to those seeking the removal of Carson's reference within the context of the Federal Oval setting, which was not historically associated with him. Other locations dedicated to Kit Carson, where he is recognized as a historical individual, are available to those seeking to acknowledge this complex figure in American history.

It is also important to reference that the monument is no longer considered a historic resource based on the loss of physical integrity and damage. For this reason, removal of the monument does not create any adverse effects to the historic Campos U.S. Courthouse or landscape of the Federal Oval.

GSA acknowledges that the Preferred Alternative may not be acceptable to all members of the community, including those who view this monument as a significant landmark of the American West and downtown Santa Fe. The monument has been documented in both its prior original condition and its damaged condition for the historical record.

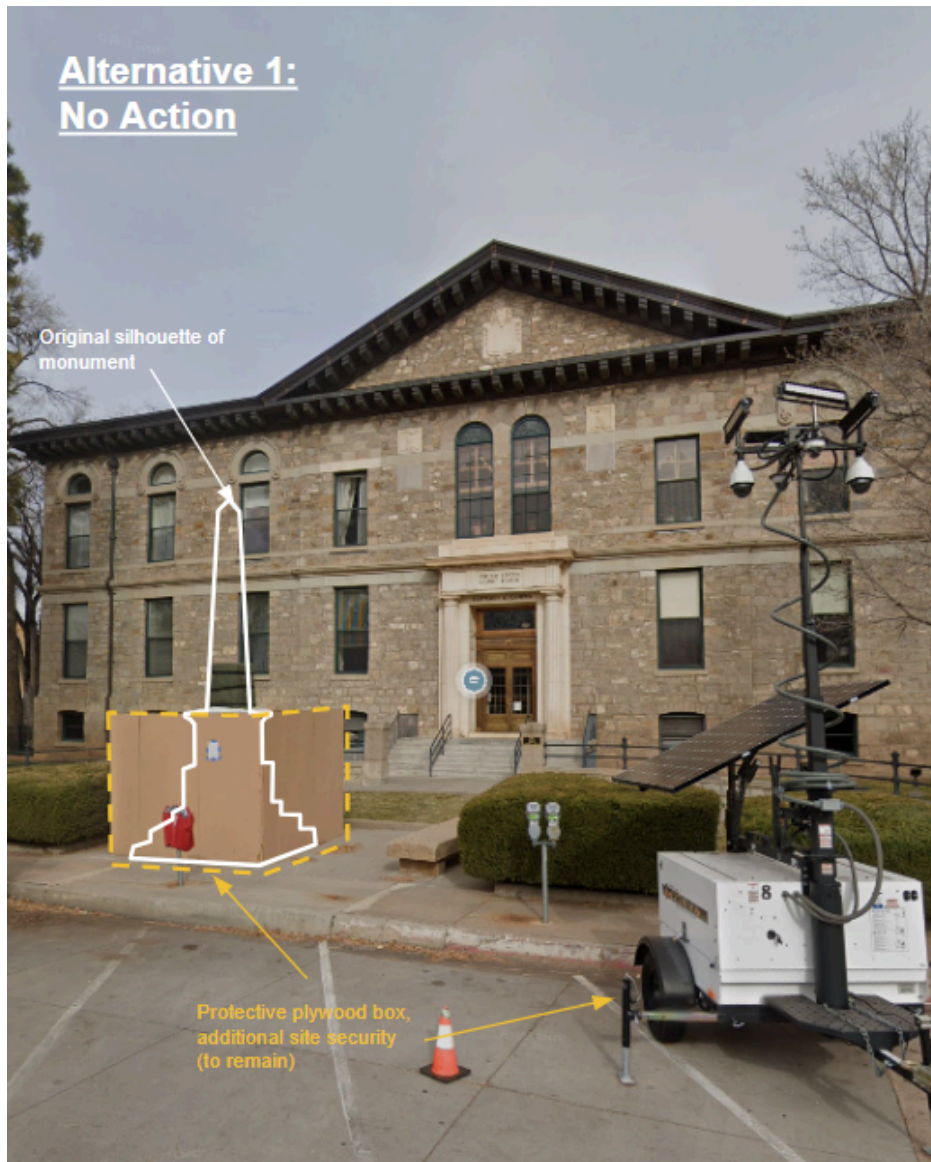


Figure 3, image showing No Action Alternative. For an image of the monument's existing conditions within the temporary protection that would remain unchanged under the No Action Alternative, see Figure 6.

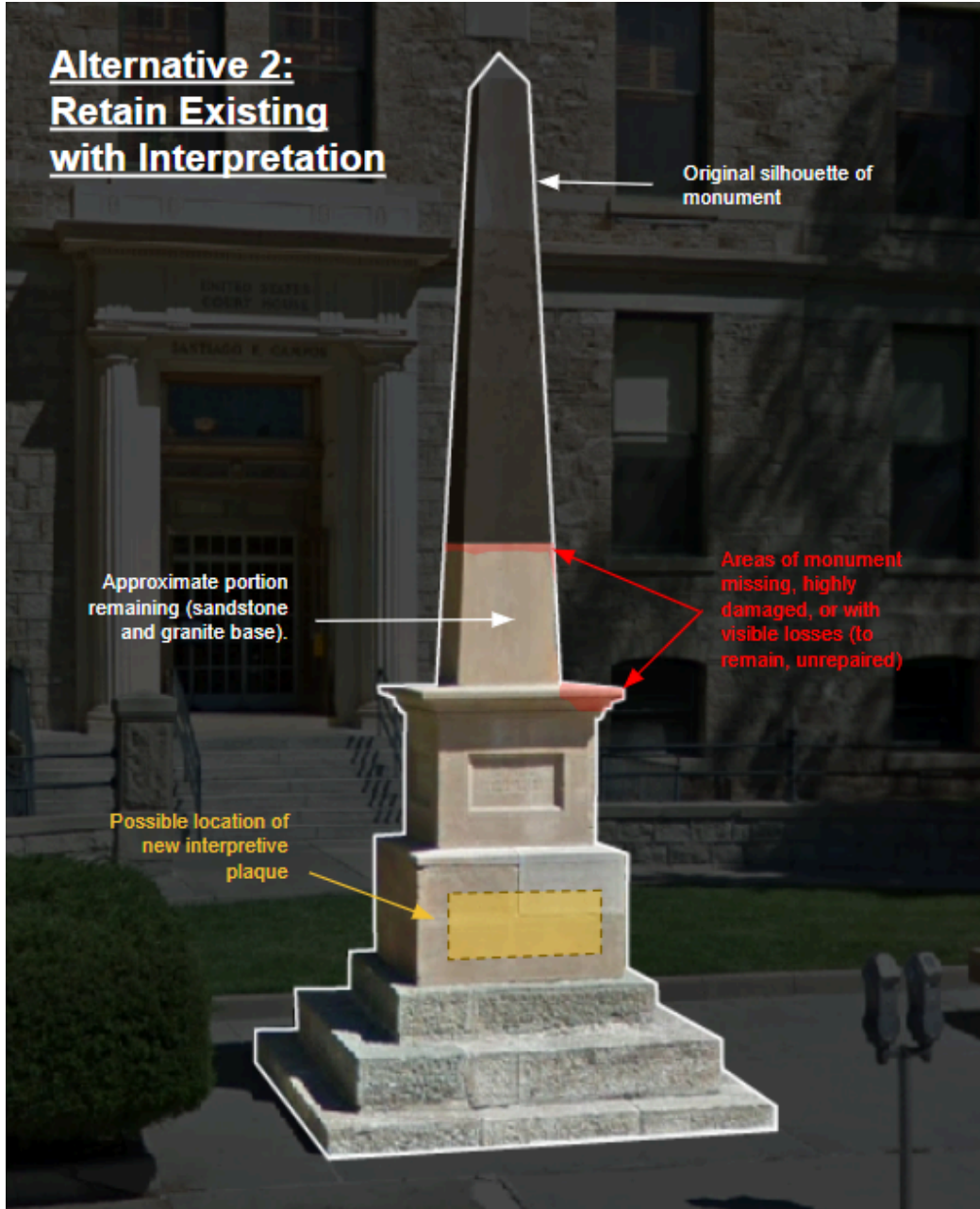


Figure 4, image showing Alternative 2: Retain Existing with Interpretation. (Note that image of the base of the monument predates recent vandalism)

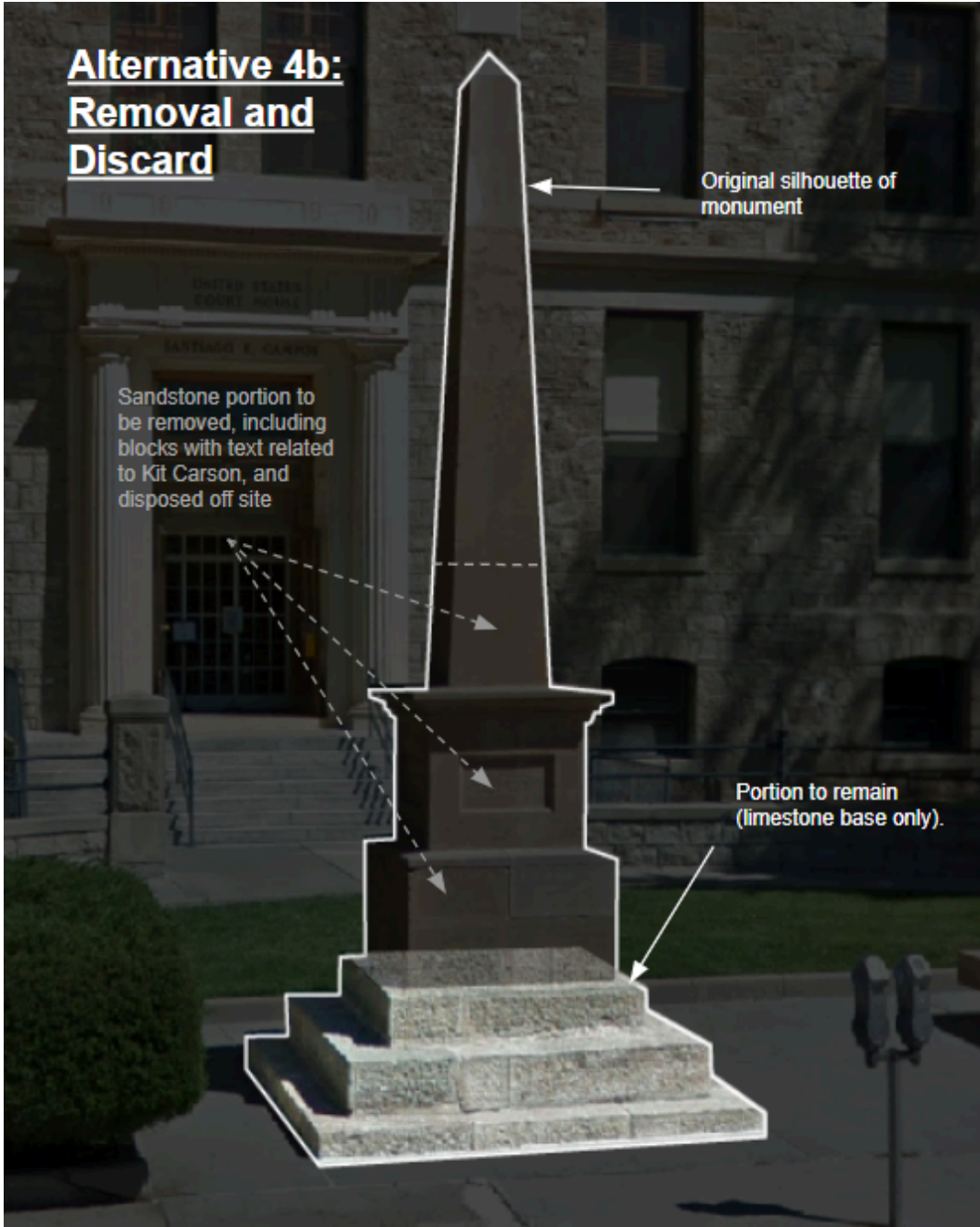


Figure 5, image showing Alternative 4b: Removal and Discard



Figure 6, Photograph of two sides of the monument, reflecting its current general appearance. Images of condition issues can be found in Appendix C. Note that not all condition issues are captured in this image. See Appendix C for detailed images of cracks, delaminating, and broken sections of sandstone.

2.3 Alternatives Considered but Eliminated from Further Study

NEPA requires GSA to assess a range of reasonable alternatives to the Proposed Action. Several alternatives were assessed to determine whether they were feasible and whether they would meet the project's purpose and need. GSA initially considered three (3) options that were discussed in early consultation meetings and have since been removed. They are described below.

2.3.1 Option 3: Relocate Monument for Public Display

Option 3, relocation of the monument for public display, involved the removal of the monument from the Federal Oval and the gifting of the monument to an appropriate organization or entity that could display the monument in a public place. In consideration of this option, GSA reached out to multiple organizations, including the Santa Fe National Cemetery, Bosque Redondo Memorial at Fort Sumner, the Kit Carson Home & Museum and the Town of Taos regarding monument relocation. The sites approached either were not interested in accepting the monument or did not respond to GSA inquiries. After GSA received the monument Condition Assessment Report, it was determined that due to the extensive damage to the monument and its deteriorated material condition from age, it would be unlikely that the monument could be successfully stabilized, removed, and relocated for permanent display. In short, it is unlikely GSA could guarantee that the obelisk would be in a condition to safely display on another public site. Therefore, Option 3 was removed.

2.3.2 Option 4a: Disassembly, Removal, and Storage

Option 4 (Removal) broadly referred to the removal of the monument from the site entirely, with no plans to relocate the monument and display it elsewhere. Option 4b, retention of the limestone base, remove and discard of the sandstone portion, is discussed above in 2.2.4. Option 4a, retention of the limestone base, removal and storage of salvaged sandstone, was discussed in early scoping meetings. Stakeholders expressed an interest in the possibility of salvaging portions of the sandstone monument. To that end, GSA investigated the possibility of storing the remains of the sandstone obelisk and blocks on site. It was determined that adequate space for storage was likely available in the basement of the Montoya Federal Office building; however, it was noted that in order to keep within the capacity of the freight elevator, the monument would need to be reduced to individual components small enough to be placed on pallets. As part of the Condition Assessment, GSA engaged a conservator to evaluate how the monument could be disassembled and stored. Following an on-site inspection, the conservator informed GSA that the monument's condition had been severely worsened by the vandalism in August 2023. The conservator explored various methods for removal but ultimately concluded that the monument's sandstone components could not be stabilized and removed intact with much confidence. The conservator's final findings, documented in the Condition Assessment (Appendix C), deemed the destruction of the monument to be total. Based on this evaluation, it was recommended that only the limestone foundation, which remained stable, could be preserved. As a result, Option 4a was ruled out as a viable solution.

2.3.3 Option 5: Restoration of the Monument

Restoration of the monument in place was also considered. In this scenario, GSA would restore the monument in place in its current location. This would require removal of the damaged portions of the monument and replacement with new materials. This option was considered because it restores aspects of the urban and site design and aesthetics. However, this was the only advantage identified in this scenario. Disadvantages of this approach included limited

support, as reflected in community and stakeholder feedback. Additionally, this scenario would require significant cost and effort to recreate the monument, with minimal retention of the original sandstone components. This restoration would also not restore the original integrity of the object, which has been lost due to prior damage and cannot be retrieved through recreation or reproduction of what was there previously. Finally, similar to Alternative 2, restoration of the monument and removal of temporary protection around it will make it difficult to protect the monument from future vandalism; the site therefore retains an ongoing security concern. The option was ultimately determined infeasible because of the Condition Assessment Report, which states that there is a very low likelihood of being able to restore the monument in place without significant losses to the original material (of which there is little remaining). Therefore, Option 5 was removed.

3.0 AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

This chapter provides relevant environmental, cultural, and socioeconomic baseline information, and identifies and evaluates the environmental and socioeconomic changes likely to result from the Proposed Action. The general Region of Influence (ROI) for this EA includes the existing Campos courthouse and Montoya Federal building, the Federal Oval, and the immediately adjoining properties. For resources where potential impacts may extend beyond the site boundaries (i.e., noise, traffic), the resource-specific ROI is defined and discussed in the appropriate section.

The methodology used to identify the existing conditions and to evaluate potential impacts on the physical and human environment involved the following: review of documentation and project information provided by GSA and their consultants, searches of various environmental and agency databases, agency consultations, and a site visit conducted in October 2024. All references are cited, where appropriate, throughout this EA.

Wherever possible, the analyses presented in this chapter quantify the potential impacts associated with implementing any of the proposed Alternatives and the No Action Alternative. Where it is not possible to quantify impacts, the analyses present a qualitative assessment of the potential impacts. The following descriptors qualitatively characterize impacts on each resource area analyzed:

- Beneficial – Impacts would improve or enhance the resource.
- Negligible – A resource would not be affected, or the effects would be at or below the level of detection, and changes would not be of any measurable or perceptible consequence.
- Minor – The action would have a barely detectable or measurable adverse impact on the resource. Effects would be localized, small, and of little consequence to the sustainability of the resource.

- Moderate – The action would have a noticeable or measurable adverse impact on the resource. This category could include potentially significant impacts that could be reduced to a lesser degree by the implementation of mitigation measures.
- Significant – The action would have obvious and extensive adverse impacts that could result in potentially significant impacts on a resource despite mitigation measures.

3.1 Resources Screened from Detailed Analysis

CEQ regulations encourage NEPA analyses to be as concise and focused as possible, consistent with 40 CFR 1500.1(b) and 1500.4(b): "...NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail ... prepare analytic rather than encyclopedic analyses." Consistent with the NEPA and CEQ Regulations, this EA focuses on those resources and conditions potentially subject to effects from implementation of the Proposed Action.

Table 3.1-1 identifies and describes the resources that GSA determined would either not be affected or would sustain negligible impacts from the Proposed Action and not require further evaluation. The resource areas dismissed from further analysis are noted in the table below.

The subsections presented throughout the remainder of this chapter provide a concise summary of the current affected environment within the ROI and an analysis of the potential effects to each resource area considered from implementation of the No Action Alternative and the Proposed Action.

Table 3.1-1. Resources Dismissed from Further Analysis within this EA

Resource	Reason for Dismissal
Biological Resources	<p>The Federal Oval is located in developed urban areas where vegetation primarily consists of maintained landscaping and high-quality wildlife habitat is not present. Wildlife occurring within the vicinity (bird species, squirrels, etc.) would be accustomed to frequent human activity and would be unlikely to experience long-term adverse impacts resulting from the Proposed Action. Species avoidance during implementation could result in short-term negligible impacts.</p> <p>The U.S. Fish and Wildlife Service's Information for Planning and Consultation system indicates the potential presence of four listed threatened and endangered species: one fish species, two bird species, and one insect species (See Appendix D). The fish species (Rio Grande Cutthroat Trout) would not be directly affected by the proposed action, and any indirect impacts from sedimentation or runoff would be negligible. While it is possible that individuals of the protected bird species (Mexican Spotted Owl and Yellow-billed Cuckoo) may utilize the limited number of trees or forage in the open area surrounding the courthouse and monument, effects would be negligible due to the limited area of potential habitat and the previously developed nature of the site. Similarly, while it is possible the insect species</p>

	<p>(Monarch Butterfly) may also utilize the site in a similar manner; however, changes to the monument would occur in a previously mowed and/or paved area.</p> <p>Overall, changes to the monument would not represent a significant change in existing land use, and the temporary nature of construction or disassembly in an area where such activities already occur. Furthermore, the APE contains no federally designated critical habitat for any of these listed species. (Source: USFWS 2024).</p>
Water Resources	<p>The project site is located within the Espanola Basin Aquifer System, which is a sole source aquifer (SSA) as designated by the Environmental Protection Agency (EPA) under section 1424(e) of the Safe Drinking Water Act of 1974, according to the EPA's NEPA Assist Analysis. The EPA's Environmental Justice (EJ) Screening and Mapping Tool was also used to analyze the area within a quarter mile of the project site (the Federal Oval). The results, which are also included in Appendix D, show this area to be within the 62nd percentile for underground storage tanks, the 73rd percentile for wastewater discharge, and the 55th percentile for proximity to hazardous waste. However, the proposed action will have no impact on water resources. No surface waters, wetlands, or floodplains exist within the proposed action areas. Staging of vehicles such as light duty construction equipment are proposed to occur on paved surfaces, and therefore no ground disturbance is anticipated. There will be no meaningful increase in impervious surfaces at the Federal Oval resulting from the proposed action. Furthermore, the proposed action will not result in new point (or nonpoint) sources of water pollution.. During any phase of the project all activities will be conducted in accordance with the Santa Fe Terrain and Stormwater Management Ordinance. Chapter 14-8.2 updated 2002. See Appendix D for additional information.</p>
Utilities	<p>The Federal Oval is currently developed and maintains existing connections to utilities. No modifications would be anticipated under any of the alternatives considered for the Proposed Action.</p>
Hazardous Materials	<p>The Proposed Action would at most require small amounts of hazardous materials (these might be used if the elements of the monument are being disassembled). Any hazardous materials will be carefully managed by the contractor so as not to be released at the Federal Oval, and these materials will not be left onsite. There will be no significant environmental impact associated with the short-term and small amount of such hazardous materials and hazardous waste products.</p>
Topology, Soils, and Geology	<p>The proposed action will not impact geology, topography, or soils. No unique geologic features (e.g., caves, cliffs, canyons, etc.) are present in the proposed action area. Geologic features that are present will not be impacted by proposed action activities, the most intrusive of which would consist of minimal staging of equipment on turf areas for short periods of time. The topography of the affected areas will remain unchanged (e.g., no leveling, cutting, or filling of terrain). The proposed action involves very little ground disturbance. Consequently, the proposed action will result in only minimal temporary adverse impacts to topography, soils, and geology. While there are sub surface archaeological resources on site, there is no expected impact to these resources (For further information, see Sec. 3.3).</p>
Socioeconomics	<p>Construction associated with the proposed action will create a small number local jobs and induce effects, such as local expenditures from historic preservation construction specialists. These jobs will be temporary, and personnel employed would not change their place of residence. Effects associated with construction will occur on a temporary basis over the course of several days to a week. The proposed action does not include substantial changes in the number of personnel at or visitors to the Campos Courthouse. Implementation of the proposed Action at the monument will be a one-time event. As a result, changes to population, demographics, income, community services and facilities, or housing would not be appreciable.</p>

<p>Noise</p>	<p>Typical noise sources at the Federal Oval include lawn mowers and other maintenance vehicles. Outside noises encroaching on the site include vehicular traffic on nearby roadways. The City of Santa Fe adopted an Ordinance related to noise (Ordinance 2009-11, sec. 6, adopted 10/27/09) that limits noise levels to 75 decibels (dBA) at any time between 7 a.m. and 10 p.m. An exception is noted for sounds caused by industrial or construction organizations or workers during their normal operations. Construction and disassembly activity associated with the proposed action may cause temporary, intermittent fluctuations in noise levels. However, noise levels from the proposed action, would be consistent with noise levels from current activities on site, such as lawn maintenance equipment. If the proposed action includes a disassembly phase of the project, reasonable measures will be taken to minimize noise impacts and disturbance from construction-related activities, such as implementing the proposed action during weekend hours. No long-term or significant noise impact will result from the proposed action.</p>
<p>Traffic and Transportation</p>	<p>The monument is located on the south side of the Federal Oval, approximately 10 feet from S Federal Plaza Place, a local two-way street with an approximately 60 ft ROW (curb to curb). The street has a row of angled parking on either side. Vehicles and construction equipment can be staged on the sidewalk pavement and adjacent parking area during implementation. The sidewalk directly in front of the monument and adjacent parking spaces can be blocked off to allow equipment. A Santa Fe ROW permit can be obtained if additional staging area is needed within the roadway. A potential reduction in lane width at this location to allow equipment would not adversely affect area businesses, since properties accessed by S Federal Place to the south also front and have pavement cuts on Lincoln Ave and Washington Ave. Traffic could easily be managed without heavily impacting access to other areas during implementation. Within the existing road network, the proposed action will not involve substantial changes in current traffic patterns. Therefore, there will be no significant impact. No long-term or significant traffic or transportation impacts will result from the Proposed Action.</p>
<p>EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations: Environmental Justice</p>	<p>Populations of special concern, as addressed by EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, must be identified and analyzed for potential environmental justice impacts. The EPA's Environmental Justice (EJ) Screening and Mapping Tool was used to analyze the area within a quarter mile of the project site (the Federal Oval). The demographic results are available in Appendix D. Under the proposed action, on-site operations would remain the same. As a result, no environmental justice impacts to specific groups of concern would be anticipated.</p>
<p>EO 13045, Protection of Children from Environmental Health Risks and Safety Risks</p>	<p>This executive order directs federal agencies to identify and assess disproportionate impacts to children's environmental health and safety risks. EO 13045 states, "Environmental health risks and safety risks' mean risks to health or to safety that are attributable to products or substances that the child is likely to come in contact with or ingest (such as the air we breathe, the food we eat, the water we drink or use for recreation, the soil we live on, and the products we use or are exposed to)." During implementation, children will not be allowed access to construction areas in order to protect them from construction activities and hazards.</p>
<p>Air Resources, Greenhouse Gases, and Climate Change</p>	<p>The project location (the Federal Oval in Santa Fe, NM) is not identified as falling within a Non-Attainment/Maintenance Area for EPA identified pollutants such as ozone, particulate matter, and nitrogen dioxide, according to the EPA's NEPA Assist Analysis. (See Appendix D). The EPA's Environmental Justice (EJ) Screening and Mapping Tool was also used to analyze the area within a quarter mile of the project site (the Federal Oval). The results, which are also included in Appendix D, show this area to be within the 73rd percentile for ozone, the 82nd percentile for Nitrogen Dioxide, and the 39th percentile for traffic proximity. Finally, the EPA's Climate and Justice Screening Tool was also utilized to analyze the site and its surrounding area at the Census Tract level. Tract No.35049000400 (the tract in which the Federal Oval is located) is identified as being in the 98th percentile for wildfire risk; however, this tract is not considered disadvantaged, in that it does not meet any</p>

	<p>burden thresholds or at least one associated socioeconomic threshold. The proposed action for the memorial and all possible alternatives (including removal) will not affect air resources, greenhouse gasses or the rate of climate change, particularly with respect to the hazards mentioned above. The emissions from the proposed action will not add to, or otherwise have a measurable effect on, local or global climate change. This analysis concludes that there will be almost no discernable impact on air resources, greenhouse gasses, and climate change from the proposed action or alternatives. Therefore, there will be no significant impact on air resources. See Appendix D for additional information.</p>
<p>Land Use & Zoning</p>	<p>The City of Santa Fe's Land Use and Urban Design Plan and Historic Zoning and Properties Map identifies the Federal Oval site as being within the Downtown and Eastside Historic District (established 1957) and the Historic Downtown Archaeological Review District. The property is also within the Business Capital District\Marcy Subdistrict, as shown in the City of Santa Fe's Zoning Map. The Business Capital District mixture of land uses, including residential uses, was designed "to promote the district's economic well being while preserving the unique architecture, townscape and aesthetics that foster a strong tourist industry and sustain the quality of life, sense of community and historical identity in the district and the city." This is consistent with the 1999 City of Santa Fe General Plan, which identifies the downtown as "a vibrant use center...and as a place of community based activities and uses for Santa Feans of all ages, cultures, and incomes." (Section 5-2, City Character and Development). The plan also notes that the downtown benefits from its government base, so policies that provide for supporting office uses are important. The proposed action would not alter or effect existing land use (government facility and courthouse); nor is it anticipated to have an impact on tourism. Therefore, no significant impacts are anticipated to land use. Affects to urban design and aesthetics are discussed in Section 3.2. Affects to historic resources, including archaeology, and historic districts are discussed in Section. 3.3.</p>

The only resource areas determined to be affected by the No Action Alternative and the Proposed Action are Urban Design and Visual Resources and Cultural Resources. These two areas are addressed in the sections that follow below.

3.2 Urban Design & Visual Resources

This chapter identifies the aspects of urban design and visual resources and systems in the Affected Environment and Context Area that could be impacted by the Proposed Action. It assesses the effects that could result from each of the Action Alternatives and the No Action Alternative, as identified and described in Chapter 2.

Urban design and visual resources include features of both the built and natural environments that together comprise the visual landscape, and how they are planned to work in cohesion. Examples include buildings, parks, scenic features, view corridors, and other landscape features and landscaping choices and amenities. Cultural resources, such as historic landmarks and historic districts, can also be visual resources; however, cultural resources as a topic are addressed separately in section 3.4. This section will address non-historic aspects of urban design and placemaking that can be affected by the Proposed Action. It relies primarily on three sets of criteria—GSA standards for visual and aesthetic resources, local guidance from the City

of Santa Fe that is applicable to the downtown area, and observable site conditions at the Federal Oval.

GSA follows internal agency standards in landscape and urban design when implementing changes at federal properties. The P-100 identifies best practices in regards to placemaking in public locations by referencing criteria in the Sustainable SITES rating system, which is essentially for landscaping what LEED is for buildings. Under Section 6 of SITES (Human Health and Well Being) the following best practices have been identified as relevant to the current project:

- *Provide optimum site accessibility, safety, and wayfinding:* Increase site users' ability to understand and access outdoor spaces by incorporating elements of accessibility, safety, and wayfinding into the site design.
- *Promote equitable site use:* Provide economic and social benefits to the local community by providing publicly available on-site events, facilities, amenities, or programming.
- *Support mental restoration:* Improve human health and well-being by providing visual and physical connections to restorative outdoor spaces.
- *Support social connection:* Strengthen community and encourage social connections by providing outdoor gathering spaces to support people gathering, eating, working, and playing together.

As previously mentioned in Section 3.1 in the analysis on land use and zoning, the City of Santa Fe's Business-Capitol District (BCD), within which the Federal Oval site falls, is a zoning district that anticipates a high level of aesthetic quality, while supporting a mix of uses in a dense, walkable, pedestrian-oriented urban fabric. The visual and aesthetic design of public spaces contributes to these goals; in particular, supporting and maintaining current and future conditions of walkability and connection adjacent to and through the site.

Finally, Figure 7 below identifies the current circulation patterns, points of interest, and activity areas at the Federal Oval that were considered in the following analysis. The Federal Oval is surrounded by vehicular drives and a perimeter sidewalk, with a boundary fence separating the public sidewalk from the Federal Property. Openings in the fence, as shown on the map below, are gateways to the pedestrian paths through the green space around the buildings. These points of entry also provide views into the site of existing visual resources, such as the federal building facades on each street face, the Pedro de Peralta statue on the west side of the property, and the Kit Carson Monument on the south side. The green space within the Federal Oval is identified as an activity area, as Peralta Park and the nearby tree-covered locations are a popular recreation for visitors, who eat lunch, walk dogs, practice fly fishing, and walk around the perimeter and through the paths on-site.



Figure 7. Aerial image depicting urban design elements of the Federal Oval, highlighting pedestrian and vehicular circulation, activity areas, and view targets and corridors.

Prior to being damaged, the Kit Carson Monument was a visual resource that contributed to the sense of place of the Federal Oval and downtown Santa Fe, serving as a focal point and source of orientation for area visitors. The monument is highly visible to visitors looking north on Lincoln ave towards the federal Campus, as well as those approaching the site by way of S Federal from the east or the west. Changes to the monument as proposed under all three alternatives are anticipated to have some effects on urban design and space in its immediate area.

3.2.1: The No Action Alternative

The No Action Alternative would have no immediate impact on the current conditions at the Federal Oval surrounding the monument. However, if left unaddressed, these conditions are likely to deteriorate over time and result in moderate adverse impacts. If the temporary security barrier and tarp around the sandstone remain in place, concealing the monument remnants, the situation will continue to worsen within the enclosure. This includes the continued deterioration of the sandstone under the tarp, as well as the accumulation of additional trash and the growth of weeds. The current enclosure also reduces the amount of walkable paved area at the front of the Campos Courthouse, which can be considered an adverse effect to accessibility. Additionally, site safety and equitable use of the area may decline if the ongoing controversy over the monument persists. The site could remain vulnerable to future acts of graffiti and

vandalism, which could result in moderate to significant adverse effects on the site. The No Action Alternative does not improve visual and physical connections to the space, nor does it provide additional opportunities for social connection and public gathering or improve the view into the site from the south side of the property.

3.2.2: Alternative 2: Retain all or Portions On-site, with Interpretation

Alternative 2 would result in minimal but beneficial impacts to urban design and visual and aesthetic resources, but it would also include moderate adverse impacts to the site, as compared to existing conditions. In terms of beneficial impacts, the removal of the plywood barrier would improve or enhance the view corridor between the street and sidewalk and the street-facing facade of the Campos U.S. Courthouse. Cleanup of the site (removal of leaves and debris) would also result in improved aesthetic conditions around this part of the Federal Oval. The addition of new interpretation would improve the appearance of the monument in a minimal way, by providing guidance and clarification on its existing condition, which would remain. Additional interpretation would promote equitable site use by adding information about indigenous history at the Federal Oval, which is not currently addressed by any interpretation on-site. However, the adverse impacts under this scenario, which include the ongoing deteriorated condition of the monument remains and its suboptimal aesthetic appearance, likely outweigh any beneficial impacts from improved interpretation/signage and site cleanup alone; while adjacent site conditions can be improved, the broken obelisk in its current condition is visually distracting, and gives the site an appearance of incompleteness. Additionally, while additional interpretation could support more equitable site use through the inclusion of indigenous narratives about the site, the presence of the damaged monument itself may still feel inhospitable to many visitors. Furthermore, the presence of the monument could still attract vandalism and attempts to forcibly remove it. Such acts have the potential to cause additional damage to urban design and visual and aesthetic resources in this public space on Federal property.

3.2.3: Alternative 4b: Disassembly and Removal

Alternative 4b would result in moderate to significant beneficial impacts to urban design and visual and aesthetic resources, as well as one minor adverse impact to the site, as compared to existing conditions. As with Alternative 2, removal of the temporary protection, as well as the remains of the sandstone monument itself would improve or enhance the view of the courthouse from the street and sidewalk. Leaving the limestone base in place allows the plaza to retain a (albeit reduced) focal point that preserves the terminus in front of the Campos U.S. Courthouse and the planned alignment between the original monument's location and the front facade. Further reduction in the height can be considered a minor adverse effect on the visual and aesthetic coherence of the existing site; however, leaving the limestone base allows a space for future intervention, in the form of additional seating, planters, or interpretation. These would be beyond the scope of Alternative 4b as presented, but Alternative 4b does not preclude their inclusion at a later date if site improvements are desired. Alternative 4b would be an

improvement over existing conditions in regards to views of the south side of the site from Lincoln street and from Federal Place Plaza, in that it increases the visibility of the Campos U.S. Courthouse front facade. Of the three alternatives, the scenario in which the monument is fully removed, leaving only the limestone base, is likely the scenario that best supports site safety in the long run. This reduces opportunities for site vandalism in the future, and greatly reduces the need for additional site security (such as the current mobile security unit that is currently on site). It also removes safety concerns related to the continued deterioration of the monument while supporting equitable site use and social connection.

3.3 Cultural Resources

This chapter identifies potential impacts to NRHP and NRHP-eligible historic properties in the Affected Environment and Context Area that could be impacted by the Proposed Action. It assesses the effects that could result from each of the Action Alternatives and the No Action Alternative, as identified and described in Chapter 2.

The Federal Oval is a culturally significant landscape managed by GSA, inclusive of archaeological, architectural, and landscape elements that contribute to its historic character. Located in the northern end of historic downtown Santa Fe on unplatted and unceded land within the City of Santa Fe Grant, the Federal Oval lies within the Santa Fe Historic District (NRHP #73001150, listed on July 23, 1973, and SR 260). The site is bordered by Paseo de Peralta to the north, South Federal Place to the south, Washington Street to the east, and Grant Street to the west. The APE for the monument is identified as the immediate property where the monument is located at the Campos U.S. Courthouse (facing S. Federal Place and Lincoln Avenue) and the surrounding views to/from the monument.

The Federal Oval's historical and cultural significance has been documented through several studies and National Register nominations. In June and July of 2024, a cultural resources study was conducted to synthesize these studies and document all potential and recorded cultural resources on federal property. This includes archaeological resources, indigenous cultural knowledge, buildings, structures, and site features. The study is on file with GSA, and an executive summary is included in Appendix A, Site Documentation. The following is a summary of identified cultural resources on the Federal Oval property.

Within the Federal Oval, there are two prominent federal buildings. The oldest, the Santiago E. Campos U.S. Courthouse (106 South Federal Place), was listed on the National Register of Historic Places (NRHP #73001152) and the New Mexico State Register of Cultural Properties (SR 244) in 1973. Originally intended as the territorial capitol, this Greek Revival courthouse was built in two stages: first in 1853-1854, then completed in 1888-1889, with a northern addition added in 1929-1930. The stone wall defining the Federal Oval and the Kit Carson Monument are also noted in the 1973 nomination's description.

The adjacent Joseph M. Montoya Federal Building and Post Office (120 South Federal Place), completed in 1963, was listed on the National Register in 2022 (NRHP #100008474). This

building combines office and postal functions, with architectural elements reflecting both regional influences and modern design principles. This listing includes part of the Federal Oval on the west side of the post office.

In addition to the National Register-listed buildings, the Federal Oval holds significance for its archaeological resources. Historically, this area was inhabited and cultivated by ancestral Tewa-speaking peoples, followed by other indigenous tribes, Spanish settlers, and Euro-American communities, all of whom contributed to Santa Fe's cultural development. This history is represented in indigenous knowledge, local archaeological sites, reflecting multiple periods: from pre-contact ancestral Tewa villages, Spanish colonial structures, Fort Marcy military features, and remnants of community events and land use. Notably, the Federal Oval was used during Santa Fe's 1883 "Tertio-Millennial" celebration, when an oval racetrack, approximately one-third mile long, was constructed along the property's perimeter. Recorded archaeological features indicate that the Federal Oval preserves intact cultural deposits and features, with the potential to yield further information on Ancestral Puebloan late Developmental through early Classic period (A.D. 900–1450) residential and agricultural activities, as well as the pre-Columbian occupation of the site before Spanish settlement.

The Campos U.S. Courthouse and surrounding Federal Oval grounds are also among New Mexico's most significant contemporary historic sites. The courthouse, surrounding wall, and landscaped grounds—the state's first courthouse square—are reflective of a late 19th-century interpretation of the English Landscape Garden style. Designed by architect and site superintendent F.H. Brigham and later modified by the Civilian Conservation Corps during the New Deal Era, the grounds continue to serve as an important public space within both the federal and municipal areas of Santa Fe. This landscape has been determined to hold local historical significance under National Register Criteria C and D, with a period of significance spanning from 1848, when the property was acquired by the U.S. Government for public use, to 1953. Elements of the Federal Oval grounds and their contributions to the cultural and historic landscape are summarized in Table 3.4.1. Additional information can be found in Appendix A.

The Kit Carson Monument was previously identified as a contributing historic element of the Federal Oval grounds. The sandstone base and obelisk have experienced natural deterioration, various repairs, alterations, and vandalism. Past repairs have created a patchy appearance, with concrete visible in some areas used to fill losses and resurface eroded sections. Additionally, vandalism has taken a significant toll over time, with the most recent and extensive incident occurring in August 2023. This event resulted in the "toppling" of a substantial portion of the obelisk and damage to the cornice.

The monument's historic integrity has been compromised, resulting in a loss of its design, materials, workmanship, and sense of place, as well as its ability to contribute to the historic landscape. In its current state, the monument no longer retains its original height—one of the key visual characteristics during the Federal Oval's period of significance.

As part of Section 106 compliance under the NHPA, GSA, in consultation with the New Mexico SHPO, determined that the Kit Carson Monument has lost its historic integrity and can no longer

convey its historic significance. Consequently, the monument is not eligible for listing in the National Register as a contributing resource to the Campos U.S. Courthouse National Register nomination or the larger Santa Fe Historic District. (Please see Appendix B, Section 106 Record).

Table 3.4.1. Components of the Federal Oval

Element	Site Type	National Register of Historic Places Eligibility
Archaeological Site LA 114261 (refers to the entire Federal Oval)	Prehistoric and Historic	Eligible- Contributing component of the Federal Oval Historic/Cultural Landscape
LA 143460	Prehistoric	Eligible- Contributing component of the Federal Oval Historic/Cultural Landscape
LA 174246	Historic	Eligible- Contributing component of the Federal Oval Historic/Cultural Landscape
U.S. Court House	Historic	NRHP-Listed and Contributing component of the Federal Oval Historic/Cultural Landscape
Joseph M. Montoya Federal Building and Post Office	Historic	NRHP-Listed and Contributing component of the Federal Oval Historic/Cultural Landscape
Stone Perimeter Wall	Historic	Eligible- Contributing component of the Federal Oval Historic/Cultural Landscape
Kit Carson Monument	Historic	Not Eligible- Noncontributing component of the Federal Oval Historic/Cultural Landscape

Table 3.4.1. Components of the Federal Oval

Element	Site Type	National Register of Historic Places Eligibility
Fountains	Historic	Eligible- Contributing component of the Federal Oval Historic/Cultural Landscape
Circulation/Concrete Pedestrian Pathways with Gates	Historic	Eligible- Contributing component of the Federal Oval Historic/Cultural Landscape
Lamp Posts	Historic	Eligible- Contributing component of the Federal Oval Historic/Cultural Landscape
Bench	Historic	Eligible- Contributing component of the Federal Oval Historic/Cultural Landscape
Trash Cans	Modern	Noncontributing
Picnic Benches	Modern	Noncontributing
Historic Trees and Shrubs	Historic	Eligible- Contributing component of the Federal Oval Historic/Cultural Landscape

For information and citations about the affected environment, please refer to the Summary of the Federal Oval Site Documentation in Appendix A. See additional NHPA documentation of the Section 106 process in Appendix B.

3.3.1: The No Action Alternative

Under the No Action Alternative, the monument would not be removed. The current subpar conditions would remain in place with minimal to moderate impacts to cultural resources. The plywood barrier is a minor distraction in front of the historic Campos U.S. Courthouse and Federal Oval. The greater concern is over the potential for continued vandalism and need for

additional site security (such as the mobile security unit that is currently on site). Safety concerns related to the continued deterioration of the monument would also remain.

3.3.2: Alternative 2: Retain all or Portions On-site, with Interpretation

Retaining significant portions of the Kit Carson Monument on-site poses potential adverse impacts to adjacent historic features of the Federal Oval. The site is likely to continue attracting vandalism, such as graffiti or further attempts to remove the obelisk, potentially causing additional damage to surrounding historic elements. While on-site interpretation could foster constructive dialogue about the history of the monument and Kit Carson, the risk of vandalism and property damage is expected to exceed typical levels for a government campus. While simply retaining the monument, which is no longer contributing, does not in itself have an immediate adverse effect.

3.3.3: Alternative 4b: Disassembly and Removal

This alternative will not impact the integrity of location, design, workmanship, feeling, or associations of either U.S. Courthouse or Montoya Federal Building in a way that would impact their status as National Register properties. No direct physical changes will be made to any other area of the Federal Oval beyond the area of the monument. Furthermore, no impacts are expected to below-ground resources and archaeology, since the limestone base of the monument is proposed to be retained in place.

4.0 CUMULATIVE IMPACTS

This section analyzes the potential cumulative effects of the proposed action and past, present, and reasonably foreseeable future actions within the proposed action's ROI. Cumulative effects of the proposed action can be viewed as "the total effects on a resource, ecosystem, or human community of that action and all other activities affecting that resource" (USEPA, 1999). The cumulative effects analysis determines if the activities involved in the proposed action would combine with these other impacts to result in either adverse or beneficial cumulative impacts when considering other actions in the ROI.

The NEPA and CEQ regulations require the analysis of cumulative environmental effects of a Proposed Action on resources that may often manifest only at the cumulative level. Cumulative effects can result from individually minor, but collectively significant actions taking place at the same time, over time. Cumulative effects are most likely to arise when a Proposed Action is related to other actions that could occur in the same location and at a similar time.

4.1 Reasonably Foreseeable Projects

The [City of Santa Fe's Capital Projects Dashboard](#) and [Residential Development Tracking Tool](#) was used by GSA to identify the following reasonably foreseeable projects within the City of Santa Fe in general proximity to the Federal Oval and project site. The projects below are within a quarter mile of the Federal Oval and have implications for cumulative impacts:

1. **Bishop's Lodge Road Reconstruction:** Bishop's Lodge Rd will be reconstructed to improve 1) safety; 2) accessibility; and 3) equity. This includes reduction in vehicle speeds, constructing ADA compliant sidewalks, pedestrian refuges, and bike lanes. The project is about 2.8 miles starting from Paseo de Peralta (touching the northeast end of the Federal Oval) all the way to the City limits/County line.
2. **Downtown Transit Center:** The Sheridan Transit Center (at approximately 123 Grant Ave) is the downtown hub for pick-up and drop-off for bus riders on both the Santa Fe Trails busses and the RTD bus. It is the drop-off point for individuals that ride the Rail Runner and take the Santa Fe Pick-Up to the plaza area. This project proposes improvements will include the realignment of bus lanes and repaving of Sheridan Street, widening of the sidewalk area, addition of trees and tree wells with steel grates within the sidewalk area, new bus shelters, and new lighting.
3. **City Hall Improvements and New City Services Center:** The City Hall of Santa Fe (at 200 Lincoln Ave, Santa Fe) has a project to improve the existing brick paved walkways surrounding City Hall and the Convention Center. There is another listed project to plan, design, purchase or otherwise secure land, construct, remodel, furnish and equip a new consolidated city services center to house administrative city functions and better serve the constituents for the City of Santa Fe; however, this project appears to be associated with City Hall, but will likely not occur on-site, based on the description.
4. **Main Library Improvement and Elevators Rehabilitation:** This project calls for the design, renovation, furnishing and equipment improvements at the Main Library of the Santa Fe Public Library (at 145 Washington Ave). This includes general improvements, rehabilitation of elevators, replacement of doors, electrical rewiring, window replacement, repairs and re-stucco of exterior, HVAC replacement/rehabilitation plus automated controls, parking lot overlay, remediation/rehabilitation of a mold problem.
5. **Recent Residential Developments:** Three residential projects that are either currently underway or recently completed that fall within close proximity to the Federal Oval. 507 & 511 Paseo de Peralta (at the street address of the same name) is a 9-unit multifamily development project that is approved, but not yet under construction. La Secoya de El Castillo (at 401 Old Taos Hwy) is a 68-unit multifamily development project that was recently completed, and is advertised as a retirement community. Plaza del Monte (at Old Taos Hwy & Camino Santiago) is a 30-unit multifamily development with 6 affordable units, and is also advertised as a retirement community. The last two projects appear to be renovations, rather than the creation of new units.

Current or recently completed projects within a quarter mile of the Federal Oval can be generally summarized as consisting of mobility improvements (improving walking conditions for pedestrians, reducing trip hazards, adding shade, etc) general improvements to public space

(interior and exterior rehabilitation at the library, and of City Hall) and improvement of existing housing or the addition of new housing.

As noted previously, the Federal Oval falls within the City of Santa Fe's [Business Capital District](#) zoning category. This category supports a mixture of land uses, including residential uses, and is designed "to promote the district's economic well being while preserving the unique architecture, townscape and aesthetics that foster a strong tourist industry and sustain the quality of life, sense of community and historical identity in the district and the city." The project's improvements as noted above align with the goals of the Business Capital District.

4.2 Cumulative Impacts

The subsections below provide an assessment of potential cumulative impacts to each resource area analyzed in this EA that could result from the combination of the Proposed Action and the above-identified reasonably foreseeable City of Santa Fe capital improvement and residential projects.

Because the proposed action will not impact resource areas other than urban design and visual resources and cultural resources, no other resource areas were analyzed for additive impacts. The proposed action had negligible to no impacts on water resources, geological resources, biological resources, utilities, infrastructure, land use, the surrounding community, and other resource areas, as these actions were small in scale and occurred on previously developed land.

4.2.1: The No Action Alternative

Implementation of the No Action Alternative would result in no increased potential for adverse cumulative impacts. Changes to the monument and the pedestrian and sitting area directly in front of the Campos Courthouse would not occur, and existing conditions at the site would remain unchanged from existing baseline conditions. As such, the No Action Alternative would not contribute to cumulative effects.

4.2.2: Alternative 2: Retain all or Portions On-site, with Interpretation

As previously stated, the area in direct proximity to the Federal Oval is undergoing several projects that improve public spaces in both the interior and the exterior of government and community facilities. These projects, if successful, support greater public use of space and pedestrian traffic. Alternative 2, which adds interpretation to the site but does not improve the material conditions of the monument remains, would have a minimal but adverse effect on the urban environment, including the goals of tourism.

4.2.3: Alternative 4: Disassembly and Removal

Alternative 4, which disassembles and removes the monument from the Federal Oval, would have a minimal but beneficial effect on the urban environment, including the goals of tourism. Removal would decrease the future likelihood of vandalism on-site at this particular location.

5.0 CONCLUSIONS AND RECOMMENDATIONS

This EA reflects GSA's environmental impact analysis for the proposed action based on its review of the best available data; public outreach and consideration of comments received during the scoping period; and consultation/coordination with Federal, State, and local agencies. The EA will be available to agencies, tribes, organizations, and individuals from the public. This EA concludes that none of the alternatives for implementing the proposed action would have a significant impact on the human environment and would not require preparation of an EIS.

6.0 ACRONYMS AND ABBREVIATIONS

AADT	annual average daily traffic
ABA	Architectural Barriers Act
ACM	asbestos containing materials
ACHP	Advisory Council on Historic Preservation
ACS	American Community Survey
AHPA	Archeological and Historic Preservation Act
AIRFA	American Indian Religious Freedom Act
APE	Area of Potential Effect
AQCR	Air Quality Control Regions
ARPA	Archeological Resources Protection Act
ASHRAE	American Society of Heating, Refrigerant, and Air Conditioning Engineers
BG	Block Group
BMP	best management practices
C&D	construction and demolition
CAA	Clean Air Act
CBD	Central Business District
CEDS	Comprehensive Economic Development Strategy
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Compensation, and Liability Information System
CFR	Code of Federal Regulations
CO	carbon monoxide
CPSC	Consumer Product Safety Commission
CWA	Clean Water Act
dB	decibel
dBA	"A" weighted decibels
DNL	day-night average sound level
EA	environmental assessment
ECHO	Enforcement and Compliance History

EDR	Environmental Data Resources
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EJ	Environmental Justice
EO	Executive Order
EPA	Environmental Protection Agency
EPACT	Energy Policy Act
EPCRA	Emergency Planning and Community Right-to-Know Act
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FFRMS	Federal Flood Risk Management Standard
FICON	Federal Interagency Committee on Noise
FINDS	Facility Index System/Facility Registry System
FONSI	Finding of No Significant Impact
FWPCA	Federal Water Pollution Control Act
FY	Fiscal Year
GAR	Grand Army of the Republic
GSA	General Services Administration
HVAC	Heating, Ventilation, and Air Conditioning
HUD	Housing and Urban Development
I	Interstate
IECC	International Energy Conservation Code
IH	Interstate Highway
LBP	lead-based paint
LEED	Leadership in Energy and Environmental Design
Lmax	maximum A-weighted sound level or maximum sound level
mg/L	milligrams per liter
N/A	not applicable
NAA	nonattainment areas
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOI	notice of intent
NOX	nitrous oxides
NM SHPO	New Mexico State Historic Preservation Officer
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O3	ozone
OSHA	Occupational Safety and Health Administration Pb Lead
P100	The Facilities Standards for the Public Buildings Service
PBS	Public Buildings Service
PCB	Polychlorinated Biphenyl
PEL	permissible exposure limit
PL	Public Law
PM10	particulate matter measuring less than 10 microns in diameter
PM2.5	particulate matter measuring less than 2.5 microns in diameter

QR	quick response
RCRA	Resource Conservation and Recovery Act
RE	renewable energy
REC	recognized environmental conditions
REQA	Regional Environmental Quality Advisor
ROI	region of influence
ROW	right-of-way
RTD	Regional Transit District
SARA	Superfund Amendments and Reauthorization Act
SDPDD	South Delta Planning and Development District
SEL	sound exposure level
Seq	equivalent sound level
SER	significant emission rate
sf	square foot/feet
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SITES	Sustainable SITES Initiative
SO ₂	sulfur dioxide
SUVCW	Sons of Union Veterans of the Civil War
SR	State Register of Cultural Properties
SSA	sole source aquifer
SWPPP	Stormwater Pollution Prevention Plan
TPY	tons per year
TSCA	Toxic Substances Control Act
USACE	U.S. Army Corps of Engineers
USAO	U.S. Attorney's Office
USC	United States Code
USCB	U.S. Census Bureau
USCDG	U.S. Courts Design Guide
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGBC	U.S. Green Building Council
UST	underground storage tank
vOC	volatile organic compound
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

7.0 LIST OF PREPARERS

GENERAL SERVICES ADMINISTRATION, REGION 7

Jamie DeAngelo, Historic Preservation and Fine Arts Specialist – Primary Author

Karla Carmichael, Regional Environmental Quality Advisor – Contributing Author, Coordination, and Document Review

Hugo Gardea, Regional Historic Preservation and Fine Arts Officer – Project Development & Management, Contributing Author, and Document Review

Victoria Green Clow, Historic Preservation and Fine Arts Specialist – Contributing Author

Mingo Tingle, Historic Preservation and Fine Arts Specialist – Document Review

Helen Y. Kearns, Regional Counsel, Office of General Counsel – Document Review

David Reyff, AIA, Regional Chief Architect – Document Review

GENERAL SERVICES ADMINISTRATION, CENTRAL OFFICE

Beth L. Savage, Director, Center for Historic Buildings & Federal Preservation Officer – Document Reviewer

CROCKER LTD - ARCHITECTURAL CONSERVATION

Ed Crocker, Conservator – Author of Condition Assessment

VERSAR GLOBAL SOLUTIONS, INC.

Michelle Wurtz Penton, PhD, RPA, Operations Manager – Author of Federal Oval Cultural Resources Study (portions incorporated into this EA)

Tamara Stewart, MA, Consulting Archaeologist, Author of Federal Oval Cultural Resources Study (portions incorporated into this EA)

APPENDIX A: SITE DOCUMENTATION & FEDERAL OVAL CONTEXT

See separate document

APPENDIX B: SECTION 106 AND NHPA DOCUMENTATION

See separate document

APPENDIX C: KIT CARSON MONUMENT CONDITION ASSESSMENT REPORT

See separate document

APPENDIX D: RESOURCE DOCUMENTATION

See separate document