

# Notice of Adoption of a National Park Service Categorical Exclusion Under Section 109 of the National Environmental Policy Act

The National Archives and Records Administration ("NARA") is adopting a National Park Service ("NPS") categorical exclusion ("CE") for landscaping and landscape maintenance in previously disturbed or developed areas under the National Environmental Policy Act ("NEPA") for use by NARA for a single action at the Harry S. Truman Presidential Library and Museum (the "Truman Library"). In accordance with section 109 of the NEPA, this notice identifies the action to which NARA will apply the CE, identifies the NPS CE that NARA plans to adopt, and describes the consultation between NARA and NPS on NARA's use of the CE, and describes NARA's consideration of extraordinary circumstances.

#### **Background:**

NARA, in cooperation with the Truman Library Institute (the "Institute), is planning the Truman Library Exterior Redesign Improvement Project, a landscape project at the Truman Library, located in Independence, Missouri. The Consolidated Appropriations Act of 2022, Pub. L. 117-103, Section 530 provided for funding to NARA in the amount of \$11,500,000 to be transferred to the Institute for "improvements to library grounds and construction and related activities." P.L. 117-103, Sec. 530. To carry out the intentions of Congress, NARA and the Institute are cooperating on a proposed project that consists of landscape and grounds improvements, including planting of native grasses and trees, installation of pedestrian paths, construction of a new monument sign, preservation and relocation of the Truman Library's Liberty Bell replica, and installation of wayfinding and lighting necessary for the landscape improvements on the Truman Library grounds. The planned improvements will commemorate President Truman's legacy in American history, provide historical and ecological educational opportunities on the grounds as an extension of the museum, and integrate the Truman Library with the surrounding Truman Historic District through a connected walking path. The landscape improvements will occur on land that has been previously disturbed through prior construction or landscaping projects. Accordingly, NARA has determined that this is a major federal project, but is the type of action which normally does not significantly affect the quality of the human environment, such that a CE would be appropriate.

Section 109 of the NEPA establishes a procedure for a federal agency to adopt a CE listed in another agency's (the "establishing agency") NEPA procedures for a proposed agency action when the category of the agency's proposed agency action is consistent with the CE. 42 U.S.C. § 4336c. To use the establishing agency's CE, the adopting agency must

identify the relevant CE listed in the establishing agency's NEPA procedures, consult with the establishing agency to ensure that the proposed adoption is appropriate, identify to the public the CE that the agency plans to use, and document the agency's adoption of the CE.

## **Categorical Exclusion Adopted:**

NARA identified the following NPS CE for adoption and use under section 109 of the NEPA:

3.3.C.16. Landscaping and landscape maintenance in previously disturbed or developed areas.

The CE is found in NPS's NEPA Handbook, and is noted as "C.19" in the Department of the Interior's Department Manual, Part 516: National Environmental Policy Act of 1969, Chapter 12: Managing the NEPA Process — National Park Service (516 DM 12). NARA intends to apply this CE to the Truman Library Exterior Redesign Improvement Project, described above.

## Consultation with NPS and Determination of Appropriateness:

In March and April 2025, NARA consulted with NPS to ensure that NARA's proposed adoption of NPS's CE is appropriate. NARA and NPS's consultation included a discussion of the scope of NARA's project, NARA's proposed adoption of one of NPS's categorical exclusions, the scope of CE 3.3.C.16, and NPS's approach to environmental review, including consideration of extraordinary circumstances. Based on this consultation, NARA's proposed actions under the Truman Library Exterior Redesign Improvement Project are very similar to the types of actions that NPS conducts under CE 3.3.C.16. Therefore, the impacts of NARA's actions are anticipated to be similar to the impacts of NPS actions, which are not significant, absent the existence of extraordinary circumstances. Accordingly, NARA has determined that NARA's proposed adoption and use of NPS's CE as described in this notice is appropriate.

#### **Consideration of Extraordinary Circumstances:**

When applying this CE, NARA will consider "extraordinary circumstances" associated with NARA's use of CE 3.3.C.16 which would preclude NARA's use of a CE and warrant further review under the NEPA. Extraordinary circumstances include consideration of effects on public health, safety, and the environment; imposition of uncertain or unique environmental risks; potential to release hazardous or toxic substances; and potential presence of endangered species or cultural resources. Where extraordinary circumstances are present, NARA may prepare an environmental assessment or environmental impact statement. As further addressed in the accompanying Notice of Categorical Exclusion and Extraordinary Circumstances Determination, there are no extraordinary circumstances present for this project. Therefore NARA will not prepare

an environmental impact statement or an environmental assessment for the proposed project.

## **Documentation of Adoption:**

NARA concludes that this notice documents the adoption of the NPS CE listed above in accordance with 42 U.S.C. 4336(c), and the CE is available for use by NARA for the Truman Library Exterior Redesign Improvement Project, effective immediately.

Mark P. Adams	7/31/2025
Mark Adams Director, Harry S. Truman Presidential Library and Museum	Date
Tamara K. Martin	07/30/2025
Tamara K. Martin, Acting Executive for Presidential Libraries	Date
Valorie Findlater	July 25, 2025
Valorie Findlater Acting Executive for Business Support Services	Date