



Categorical Exclusion and Extraordinary Circumstances Review

Project: Truman Library Exterior Redesign Improvement Project	Location: Harry S. Truman Presidential Library and Museum, Independence, MO	Date: July 25, 2025
	Project No. 2025-01	
Type of Project: <input type="checkbox"/> Operation and Maintenance Activities <input checked="" type="checkbox"/> Repairs/ Renovation Project <input type="checkbox"/> New Construction Project <input type="checkbox"/> Lease <input type="checkbox"/> Other	Level of NEPA Analysis: <input checked="" type="checkbox"/> Categorical Exclusion <input type="checkbox"/> Environmental Assessment Needed <input type="checkbox"/> Environmental Impact Statement Needed	
Other Environmental Permits/Analysis Needed: Because NARA is adopting a categorical exclusion from the National Park Service, Categorical Exclusion 3.3.C.16 <i>Landscaping and landscape maintenance in previously disturbed or developed areas</i> , NARA is considering NPS's extraordinary circumstances.		
Project Description: NARA, in cooperation with the Truman Library Institute, is planning a landscape project at the Truman Library. 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. NARA and the Institute plan to make 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 landscape improvements will occur on land that has been previously disturbed through prior construction or landscaping projects. The landscaping improvements will not have a negative effect on the Truman Library, which is part of the Harry S. Truman National Historic District.		
EXTRAORDINARY CIRCUMSTANCES		
1. Reasonable likelihood of significant effects on public health, safety, or the environment.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Notes:
2. Reasonable likelihood of significant environmental effects (direct, indirect, and cumulative).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Notes:
3. Imposition of uncertain or unique environmental risks.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Notes:
4. Greater scope or size than is normal for this category of action.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Notes: NARA has consulted with NPS on the scope of its

	application of this categorical exclusion and has determined that NARA's proposed action fits in this category.
5. Reportable releases of hazardous or toxic substances as specified in 40 CFR part 302.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes:
6. Releases of petroleum, oils, and lubricants, application of pesticides and herbicides, or where the proposed action results in the requirement to develop or amend a Spill Prevention, Control, or Countermeasures Plan.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes:
7. When a review of an action reveals that air emissions exceed de minimis levels or otherwise that a formal Clean Air Act conformity determination is required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes:
8. Reasonable likelihood of violating any Federal, State, or local law or requirements imposed for the protection of the environment.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes:
9. Unresolved effect on environmentally sensitive resources	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes:
10. Involving effects on the quality of the environment that are likely to be highly controversial.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes:
11. Establishes a precedent (or makes decisions in principle) for future or subsequent actions that are reasonably likely to have a future significant effect.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes:
12. Potential for degradation of already existing poor environmental conditions. Also, initiation of a degrading influence, activity, or effect in areas not already significantly modified from their natural condition.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes:
13. Introduction/employment of unproven technology.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes:
14. Has significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); floodplains (EO 11988); national monuments; migratory birds; and other ecologically significant or critical areas.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes: See prior Environmental Assessment . Wilderness areas, wild or scenic rivers, national natural landmarks, drinking water aquifers, prime farmlands, wetlands, floodplains, national monuments, and other ecologically significant or critical areas are not present in the project area. No actions will be taken which will have significant impacts on park, recreation, or refuge lands or migratory birds.
15. Has significant impacts on properties listed or eligible for listing in the National Register of Historic Places.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Notes: See attached letter from SHPO. The Harry S.

	<p>Truman Presidential Library is a contributing property in the Harry S. Truman National Historic District, but the proposed action would not negatively impact the historic integrity of the site as the Library gains its significance from its extraordinary value to local and national historic contexts and themes, not from its architectural or landscape design. The lands within the project site have a low potential for intact archeological deposits, as the area of potential effects includes previously disturbed areas.</p>
<p>16. Has significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species or have significant impacts on designated critical habitat for these species.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Notes: See prior Environmental Assessment. There are endangered species in the area, but no actions will be taken that would significantly impact Endangered or Threatened species.</p>
<p>17. Limits access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Notes: No Indian sacred sites exist on the property.</p>
<p>18. Contributes to the introduction, continued existence, or spread of noxious weeds or nonnative invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and EO 13112).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Notes: No actions will introduce non-native invasive species on the site.</p>

DETERMINATION

I find the proposed project qualifies as a CATEGORICAL EXCLUSION with no extraordinary circumstances. Specify which CATEX: 3.3.C.16 *Landscaping and landscape maintenance in previously disturbed or developed areas. (adopted from NPS).*

NARA has determined that its proposed action is substantially the same as the action covered by NPS's categorical exclusion determination and that there are no extraordinary circumstances present. Therefore NARA will not prepare an environmental impact statement or an environmental assessment for the proposed project. NARA may revoke this categorical exclusion if changes in the proposed action render it ineligible for exclusion or if new evidence emerges which indicates that serious local or environmental issues exist or federal, state, or local laws would be violated. As the Responsible Official, I have determined that this action is eligible for a categorical exclusion pursuant to the National Environmental Policy Act, 42 U.S.C. § 4336(a)(2).

Mark P. Adams

Mark Adams
Director, Harry S. Truman Presidential Library and
Museum

7/31/2025

Date

Tamara K. Martin

Tamara K. Martin,
Acting Executive for Presidential Libraries

07/30/2025

Date

Valorie Findlater

Valorie Findlater
Acting Executive for Business Support Services

July 25, 2025

Date

June 25, 2025

Alicia Stukes
National Archives and Records Administration
8601 Adelphia Road, Room 2300
College Park, MD 20740

Re: SHPO Project Number: 106-JA-25 — Harry S. Truman Presidential Library and Museum
Landscape Renovation – 500 West US Highway 24, Independence, Jackson County, Missouri
(NARA)

Dear Alicia Stukes:

Thank you for submitting information to the State Historic Preservation Office (SHPO) regarding the above-referenced project for review pursuant to Section 106 of the National Historic Preservation Act, P.L. 89-665, as amended (NHPA), and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of historic properties.

We have reviewed the information regarding the above-referenced project and have included our comments on the following page(s). Please retain this documentation as evidence of consultation with the Missouri SHPO under Section 106 of the NHPA. SHPO concurrence does not complete the Section 106 process as federal agencies will need to conduct consultation with all interested parties. **Please be advised that, if the current project area or scope of work changes, such as a borrow area being added, or cultural materials are encountered during construction, appropriate information must be provided to this office for further review and comment.**

If you have questions, please contact the SHPO at (573)751-7858 or call/email Aaron Schmidt, (573) 522-4641, aaron.schmidt2@dnr.mo.gov. If additional information is required, please submit the information via email to MOSection106@dnr.mo.gov.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE



Dawn Scott, Director
Deputy State Historic Preservation Officer

c: John Hamilton, NARA
Mark Adams, NARA
Devon Pawloski, NARA
Jennifer Klein, NARA

SHPO Project Number: 106-JA-25 — Harry S. Truman Presidential Library and Museum
Landscape Renovation – 500 West US Highway 24, Independence, Jackson County, Missouri (NARA)

COMMENTS:

After review of the submission, SHPO concurs that the Harry S. Truman Library at 500 West US Highway 24 is listed in the National Register of Historic Places (NRHP). According to the additional information provided in the latest submission, all of the landscape updates that are being proposed for this project were originally part of the Library's 2020 renovation plan. These prospective changes were already reviewed in 2018, at which time it was noted that the undertaking would have no adverse effects. SHPO concurs that the scope of work (which includes adding sidewalks, a monument sign, outdoor classroom area, and picnic areas; replacing some roadway lighting; making changes to irrigation lines; replacing soil; and planting trees and other plants) will have **no adverse effect**.