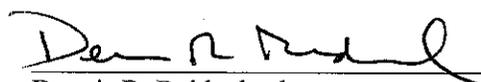

**National Park Service
U.S. Department of the Interior**

**Valley Forge National Historical Park
Pennsylvania**

**General Management Plan and Environmental Impact Statement
Record of Decision**

Approved:



Dennis R. Reidenbach
Regional Director, Northeast Region

Date: 9/28/07

Recommended:



Michael A. Caldwell
Superintendent, Valley Forge National Historical Park

Date: 9/19/07

**U.S. Department of the Interior
National Park Service**

Record of Decision

General Management Plan and Environmental Impact Statement

Valley Forge National Historical Park

Pennsylvania

The U.S. Department of the Interior, National Park Service (NPS) has prepared this Record of Decision (ROD) for the *Valley Forge National Historical Park (NHP) General Management Plan / Environmental Impact Statement (GMP/EIS)*. This ROD includes a description of the project background, a statement of the decision made, a description of the selected action, a list of measures to minimize and/or mitigate environmental harm, synopses of other alternatives considered, the basis for the decision, findings on impairment of park resources and values, a description of the environmentally preferred alternative, and an overview of public and agency involvement in the decision-making process. In addition, the complete list of management objectives and potential actions related to the selected action and the executed Programmatic Agreement (PA) between the NPS and the Pennsylvania State Historic Preservation Officer (SHPO) are appended to this ROD.

Project Background

A GMP is periodically prepared for each unit of the national park system in order to help the NPS, in consultation with the public, decide what resource conditions and visitor experiences a park should provide and why. Each GMP defines the basic philosophy of park management and provides broad guidance to park managers, who make hundreds of decisions each year that can affect a park's resources and its visitors. The GMP sets directions for resource protection and visitor use, and the NPS adopts its findings and uses them to guide the management of the park for 10 to 20 years. The clarification of what must be achieved according to law and policy is based on a review of the park's purpose, significance, and mission.

Extensive public involvement was an essential part of the planning process. The public, stakeholders, the interdisciplinary GMP team, and park staff worked together to define the vision for Valley Forge NHP as:

- a place where citizens understand, care for, and preserve their history and natural heritage
- a place where life-long education is compelling
- a place that is a vital and valued part of the community

Planning process participants raised many issues and identified opportunities that were then considered during the process. Through public meetings, briefings, newsletters, and the park website, five core goals were identified for future management of the park. These objectives were the foundation for development of management alternatives and ultimate identification of the selected alternative:

- transform the visitor experience throughout the park from one that is primarily active recreation to one that integrates and enhances interpretive and recreational opportunities
- develop and promote educational initiatives about the American Revolution and other themes and stories the park represents
- protect, enhance, and make accessible the park's historic buildings, landscapes, and collections
- restore natural habitats and bio-diversity
- manage traffic to provide a better experience for park visitors and neighbors while addressing regional congestion

Decision (Selected Action)

Based on the information and analysis presented in the *Draft GMP/EIS* for Valley Forge NHP issued in November 2006 and the *Abbreviated Final GMP/EIS* issued in July 2007, the NPS will implement Alternative C. Alternative C includes management objectives and potential actions for natural and cultural resource management, visitor use and experience, operations, and working with partners.

Description of the Selected Action

Under Alternative C, visitors will have the opportunity to decide the kind of experience they want, depending on learning style, interest, and time. The park will provide a core message and experience for all visitors that are primarily immersive and that focus on the encampment and the American Revolution. A self-discovery approach will illustrate additional areas of the park, and historic and natural resource themes and topics. Excellent orientation, as well as excellent programming, will be the keys to this approach.

More historic buildings will be open to visitor use, and new authorities will be used to lease park buildings to outside tenants, in order to bring in new resources for preservation.

The landscape of the core interpretive focus areas will evoke the 18th century. Some historic views will be rehabilitated to facilitate interpretation. Most areas of the park will be preserved as is, however.

The park's biological resources will be managed to promote preservation and restoration of the natural abundances, diversities, dynamics, and distributions of native plants and animals. This will be accomplished through active environmental restoration.

The park's trail system will be organized, completed, and managed as a system, including connections to regional trails and removal of unmaintainable trails.

Through-traffic on public roads will be calmed, in partnership with state and local government. To enhance the visitor experience, some roads in the park will be closed to through- and visitor-traffic. Visitors could use a shuttle, walk, or bike to access areas within the park. The number of parking lots will change from 26 to 21, including removal or relocation of existing lots.

To further achieve the park mission of preservation and interpretation, park staff will be enabled to facilitate greater involvement by the community in these activities. Existing partnerships will be strengthened, and new partnerships will be actively pursued.

Table A-1 (Appendix A) provides a complete list of the management objectives and potential actions associated with the selected action. The table is a modified version of Table 2-8, originally provided in the *Draft GMP/EIS*.

Mitigating Measures/Monitoring

During preparation of the GMP/EIS for Valley Forge NHP, the NPS staff and planning team identified mitigation measures to minimize the adverse impacts of the management objectives and potential actions. Table 1 summarizes the list of general mitigative measures that will be implemented as part of the selected action (Alternative C). Additional mitigation strategies may be required as potential actions are designed and implemented. These strategies will be identified as specific projects move through further National Environmental Policy Act (NEPA) compliance.

Table 1: Summary of Mitigation Measures

Affected Environment		Action	Mitigation
Cultural Resources	Historic Buildings and Structures	Demolition of buildings and structures	All contributing structures were physically surveyed and described during the List of Classified Structures Field Inventory. To mitigate the adverse effect that results from demolition of the contributing historic structures, scaled, face-on photographs of each façade of each structure will be taken. A set of these photographs will be provided to the Pennsylvania SHPO. For more information, see page 4-18 and Appendix D in the <i>Draft GMP/EIS</i> , as well as page 23 of the <i>Abbreviated Final GMP/EIS</i> .
	Archeological Resources	Reforestation	Survey, planning, and consultation to identify appropriate mitigation. For more information, see pages 4-22 and 4-23 in the <i>Draft GMP/EIS</i> , as well as the executed PA with the Pennsylvania SHPO (attached).

Table 1: Summary of Mitigation Measures (continued)

Affected Environment	Action	Mitigation	
Cultural Resources (continued)	Archeological Resources	Reforestation	Survey, planning, and consultation to identify appropriate mitigation. For more information, see pages 4-22 and 4-23 in the <i>Draft GMP/EIS</i> , as well as the executed PA with the Pennsylvania SHPO (attached).
	Archeological Resources	Construction of the Schuylkill River pedestrian bridge	If resources cannot be avoided, or unknown resources are discovered, the park will consult with the Pennsylvania SHPO on mitigation. For more information, see pages 4-22 and 4-23 in the <i>Draft GMP/EIS</i> , as well as the executed PA with the Pennsylvania SHPO (attached).
	Archeological Resources	Construction of underground utility lines or septic fields, and/or parking for new visitor-services concessions	If resources cannot be avoided, or unknown resources are discovered, the park will consult with the Pennsylvania SHPO on mitigation. For more information, see pages 4-22 and 4-23 in the <i>Draft GMP/EIS</i> , as well as the executed PA with the Pennsylvania SHPO (attached).
Physical and Natural Resources	Surface Waters and Groundwater	Construction of new facilities	Appropriate stormwater management will be used to prevent sedimentation. For more information, see pages 4-37 through 4-39 in the <i>Draft GMP/EIS</i> .
	Surface Waters and Groundwater	Establishment of formalized connections between loop trails	Use of stabilizing vegetation at the trails' edges will contain soils and prevent sedimentation. For more information, see pages 4-38 and 4-39 in the <i>Draft GMP/EIS</i> .

Table 1: Summary of Mitigation Measures (continued)

Affected Environment	Action	Mitigation	
Physical and Natural Resources (continued)	Surface Waters and Groundwater	Construction of a Schuylkill River water trail landing	Commitment to low-impact design will minimize and localize sedimentation. For more information, see pages 4-38 and 4-39 in the <i>Draft GMP/EIS</i> .
	Wetlands	Landscape rehabilitation in the Grand Parade	A small wetland within the Grand Parade may be impacted during the asbestos remediation project, which will occur prior to further landscape rehabilitation identified by the GMP. If avoidance of the wetland is not possible (during the asbestos remediation or the landscape rehabilitation), an appropriate mitigation strategy will be developed. For more information, see page 4-46 of the <i>Draft GMP/EIS</i> , as well as pages 6 and 20 of the <i>Abbreviated Final GMP/EIS</i> .
	Wetlands	Pedestrian/bicycle crossing of the Schuylkill River	Boardwalk structures, if utilized, will be located at a sufficient height to minimize shading of the wetland vegetation. Further mitigation strategies will be identified during the permitting and design phases of this project. For more information, see page 4-46 of the <i>Draft GMP/EIS</i> , as well as pages 6 and 20 of the <i>Abbreviated Final GMP/EIS</i> .

Table 1: Summary of Mitigation Measures (continued)

Affected Environment		Action	Mitigation
Physical and Natural Resources (continued)	Special Status Species	Pedestrian/bicycle crossing of the Schuylkill River	Prior to design and construction of the crossing, the NPS will survey the area for suitable habitat for bog turtles, as requested by the U.S. Fish and Wildlife Service (USFWS). If suitable habitat exists, a qualified professional will survey the area for bog turtles. If bog turtles are located, an appropriate mitigation strategy will be developed in consultation with the USFWS. For more information, see page 5-7 of the <i>Draft GMP/EIS</i> , as well as page 7 of the <i>Abbreviated Final GMP/EIS</i> .

Other Alternatives Considered

Following is a general description of the other alternatives considered for the Valley Forge NHP GMP/EIS. Each alternative is described in detail in Chapter 2 of the *Draft GMP/EIS* (see pages 2-23 through 2-38).

Alternative A (No-Action)

This alternative assumes a continuation of current management practices at Valley Forge NHP, without any substantive changes in facilities, infrastructure, or resource investment. This concept provides a baseline from which to compare the action alternatives, to evaluate the magnitude of proposed changes proposed by the action alternatives, and to measure the environmental effects of those changes. This no-action concept follows the guidance of the Council on Environmental Quality, which describes the no-action alternative as representing no change from the existing management direction or level of management intensity. In Alternative A, there would be no construction of new facilities and no infrastructure changes, except to accommodate many current approved plans of the NPS, including the rehabilitation of the Valley Forge Train Station and the construction of the River Crossing Complex by the Pennsylvania Department of Transportation (PennDOT).

The visitor experience would remain unchanged and would comprise self-guided travel through a landscape that is difficult to understand and that has few interpretive exhibits or programs.

The cultural landscape would be unchanged and would continue to largely reflect the state-park commemorative period on the south side and a modern agricultural and old-field landscape on the north side.

Natural resources would continue to be minimally managed. Forests and meadows would not be rehabilitated. The herd of white-tailed deer would not be managed.

No new traffic congestion management initiatives would be undertaken, with the exception of the previously approved River Crossing Complex.

Staff responsibilities for meeting the park mission of preservation and interpretation would remain as is, and no new partnership initiatives would be undertaken.

Alternative B

Alternative B would include many of the key objectives of Alternative C, such as enhanced management of historic structures and natural resources, trail system enhancement, and park staff responsibilities. Differences are found in visitor experience options, management of the cultural landscape, and means to manage circulation.

Alternative B would provide a palette of new options for visitors to tailor visits and experiences to best meet their own needs and interests. Experiences would focus on exploration and self-discovery of the full cultural and natural history of Valley Forge. Excellent orientation, as well as the use of new technologies, would be the key to this approach.

The historic landscape would be preserved as is, and the park would be respected as a memorial landscape that has been commemorated in many ways over generations. "Layers" from all periods would be sustained and actively interpreted through the use of technology and multimedia.

Through-traffic on public roads would be calmed, in partnership with state and local government. Commuters would continue to use public roads, and visitors would continue to use private vehicles on the tour route to access various sites throughout the park.

Basis for Decision

This section provides the rationale for selecting and implementing Alternative C for the Valley Forge GMP. In arriving at this decision, the NPS and planning team members evaluated and compared each of the project alternatives with respect to how well they meet the stated project purpose and need (as captured by the five objectives listed in Project Background above) and protect the park's resources and values, including the potential for adverse impacts or impairment.

A summary of how the selected action most completely supports the objectives of the GMP is provided below. The following section, Findings on Impairment of Park Resources and Values, provides a brief summary of the potential for adverse impacts or impairment. (See Chapter 4 of the *Draft GMP/EIS* for a full description of environmental impacts.)

Transform the visitor experience throughout the park from one that is primarily active recreation to one that integrates and enhances interpretive and recreational opportunities

Appropriate recreational uses will continue to be welcomed in the park, such as those activities that contribute to the public's understanding of park history and its resources. Recreational activities that damage park resources will be prohibited. The NPS will develop and provide better information and special interpretation about park history, resources, and activities specifically targeted to these visitors. The selected action will provide an interpretive experience that combines self-discovery with formal programming; therefore, recreation visitors will have more opportunities to learn while recreating.

Develop and promote educational initiatives about the American Revolution and other themes and stories the park represents

Interpretation will emphasize both the encampment and the American Revolution, as well as complementary themes including other events and eras in the history of Valley Forge. Interpretation of natural resources also will be emphasized. The NPS will continue to work with partners to develop and present programming and activities, and will seek additional partners in order to develop a more robust program of education and interpretation. Particularly, the NPS will seek to develop and promote educational initiatives in cooperation with regional and national American Revolution sites and institutions.

Protect, enhance, and make accessible the park's historic buildings, landscapes, and collections

The selected action will best protect, enhance, and make accessible the park's cultural resources, including historic buildings, landscapes, and collections. Key historic buildings will be preserved and some will be rehabilitated for interpretive or other visitor uses. Other historic structures, for which there is no necessary and feasible interpretive or operational use, will be available for visitor-service concessions or for general leasing in order to bring in outside funding for the preservation and support of the buildings.

Two areas of great interpretive value – Muhlenberg's Brigade and the Grand Parade - will be rehabilitated to 18th century conditions. Rehabilitation of the Grand Parade will include filling of the quarries (with the exception of Cave Quarry) that mar this essential cultural landscape at the heart of the park to their historic contour. The existing park maintenance facility also will be removed from within the Grand Parade and relocated to an area of lesser interpretive value. These actions will remove an inherited impairment from within the park boundaries. The remainder of the park's cultural landscape will be preserved as it is, and the park will be respected as a memorial landscape that has been commemorated in many ways over generations. The park will reflect and interpret the "layers" from all periods, including the encampment period, the 19th century agricultural and industrial period, and the 20th century state park commemorative period.

To better protect the park collection and make it more accessible to visitors, the NPS will consolidate its museum and library collections in a single place with modern environmental and security controls. As staffing allows, the collections will be available for viewing and study by visitors and scholars. To increase public access to information about the collections, the park will expand its use of the Web Catalog.

Restore natural habitats and bio-diversity

Within forested and other naturally occurring biological communities, the NPS will actively manage the park's biological resources in order to preserve and restore natural abundances, diversities, dynamics, and distributions of native plants and animals. In cases in which species populations occur in unnaturally high or low concentrations as a result of human influences or extirpations of predators, and these occurrences cause unacceptable impacts on natural resources and processes, the NPS will take action to accelerate natural recovery through biological and physical remedial actions. This includes a future vegetation management plan that will determine the best means to manage infestations of exotic invasive plants, as well as how to achieve subsequent revegetation of forests and meadows. A future deer management plan/EIS will determine the best means to manage the size of the white-tailed deer herd.

The high habitat value of tall grass meadows will be enhanced through control of exotic invasive plants and other measures, to be identified through the future vegetation and deer management plans.

To better protect the park's water resources, whole-watershed management strategies will be implemented. To the extent possible, threats to water quality both inside and outside the park will be

minimized and existing water quality deficiencies will be improved. Natural hydrologic flows in the park will be preserved and restored where possible.

Manage traffic to provide a better experience for park visitors and neighbors while addressing regional congestion

The selected action will manage vehicular traffic to reduce the impacts of congestion and excessive speed on park resources and visitors. The selected action will best meet this goal within the park by calming through-traffic on public roads (PA Route 23 and PA Route 252), removing private vehicles from some park roads, and modifying the locations of parking lots. To address regional traffic congestion on local roads, the selected action supports the previously proposed half-diamond interchange at the intersection of Pawlings Road with US 422.

Findings on Impairment of Park Resources and Values

The NPS has determined that implementing the selected action will not constitute an impairment of park resources and values. This conclusion is based on a thorough analysis of the environmental consequences described in Chapter 4 of the *Draft GMP/EIS* and summarized below, agency and public comments received, and the professional judgment of the decision-makers in accordance with *NPS Management Policies 2006*.

The selected action will enhance the park's ability to manage cultural resources by stabilizing, preserving, and rehabilitating historic structures, as well as preserving the small-scale and major features within the cultural landscape: an overall long-term, beneficial impact to these resources. A major, adverse impact will result from the demolition of several post-encampment era buildings listed on the National Register. However, this action would not constitute impairment because these resources are not (1) necessary to fulfill specific purposes identified in the park's enabling legislation; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified in relevant NPS planning documents as being of primary significance.

Under the selected action, the health of the forests and meadows, as well as the diversity of wildlife that inhabit these areas, will be enhanced through active management and environmental restoration. Over the long-term, diversity will improve, resulting in a major beneficial impact to vegetation and wildlife. Geologic resources, water resources, floodplains, air quality, soundscapes, and lightscapes all will be impacted beneficially through improved resource management and cooperation with partners to minimize outside, adverse impacts on these resources.

The visitor experience will be beneficially impacted due to new interpretive options, improved orientation, and the use of technology. The cultural landscape of two interpretive focus areas (Grand Parade and Muhlenberg's Brigade) will be rehabilitated to evoke 18th century conditions, and the quarries within the Grand Parade (except Cave Quarry) will be filled to their historic contour. The filling of the quarries will remove an existing impairment within the park landscape. This will benefit not only the cultural landscape but also visitor understanding and experience of this resource. Visitor experience will further be enhanced under the selected action through the rehabilitation of historic views between Redoubts 1, 2, 3, and 4 and Stony Battery to Star Fort. Visitors also will have more options for exploration of the park, with the combination of self-discovery/use of technology at some interpretive areas, as well as the immersive experiences offered at the Grand Parade, Muhlenberg's Brigade, and Washington's Headquarters.

The calming of through-traffic on public roads within the park will beneficially impact visitor safety and lead to a better visitor experience. The closure of some public roads to visitor and through-traffic will beneficially impact resources as well as the visitor experience. Visitor access to sites also will be enhanced through the use of a shuttle.

Impacts to park operations and facilities will be adverse in the short-term; however, as partnerships and volunteer opportunities are actively pursued, the overall impact will be major and beneficial. Volunteers and partners would further preservation and interpretive initiatives, and park staff and funding could be focused where it is needed.

Environmentally Preferred Alternative

The Environmentally Preferred Alternative is defined by the CEQ as “the alternative that will promote the national environmental policy as expressed in the National Environmental Policy Act [Section 101(b)].” Section 101(b) defines six criteria for an Environmentally Preferred Alternative (listed below). Generally, the Environmentally Preferred Alternative is the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources. Each criterion is presented below, followed by a discussion of how well the proposed alternatives meet each one.

1. ***Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.*** The goal of the NPS at all units is to serve as trustees of the environment for future generations. Under the No-Action Alternative, historic structures within the park would be preserved as is, and long-term, adverse impacts would result from continued inappropriate use and deferred maintenance as staff and funding diminished. The NPS would preserve as is the natural resources within the park. Exotic invasive species and white-tailed deer would continue to threaten biodiversity within the forests and meadows, which could lead to the ultimate loss of the forests, as they are unable to regenerate. This would also lead to a deterioration of existing cultural landscape patterns.

Alternatives B and C would enhance the park’s ability to meet this criterion by stabilizing, preserving, and rehabilitating historic structures, as well as portions of the cultural landscape. The health of the forests and meadows would be enhanced through active management and environmental restoration. While both action alternatives would also rehabilitate interpretive focus areas within the cultural landscape, Alternative C will fill the quarries within the Grand Parade (except Cave Quarry) to their historic contours, thus removing this intrusion from the cultural landscape and enhancing understanding.

2. ***Ensure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings.*** Under the No-Action Alternative, the park would strive to provide safe, healthful, productive, and aesthetically pleasing surroundings for its visitors. However, the landscape itself would not be rehabilitated to enhance visitor understanding and experience of the site and the health of the forests and meadows would be at stake. Visitors who come to the site for understanding and appreciation of the surroundings would eventually notice a visual deterioration of these resources. Alternative A would not implement new traffic congestion management initiatives, so conflicts between vehicles, bicycles, and pedestrians would remain.

Alternatives B and C would take steps to improve the safety and aesthetics at Valley Forge NHP. As natural and cultural resource management improved so would visitor enjoyment and understanding of the site. Alternative C also will include the rehabilitation of historic views, further enhancing the aesthetics at the site. Through-traffic on public roads will be calmed, thus improving safety at hazardous intersections and crosswalks. Alternative C will take traffic improvements one step further by closing some roads to visitor and through-traffic, eliminating safety conflicts between vehicles and pedestrians/bicycles. Both action alternatives would also enhance existing trail systems throughout the park, closing personal trails and separating pedestrians from bicycles, in some locations.

3. ***Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.*** Currently at Valley Forge NHP, the resources within the park are used by both interpretive and recreational visitors, with recreational visitors making up approximately 80% of visitation. Under Alternative A, heavy recreational use of the park would continue in sensitive natural and cultural resource areas, threatening resources such as historic structures, cultural landscapes, archeological resources, surface waters, wetlands, vegetation, and wildlife. Under the action alternatives, improved management of cultural and natural resources would provide protection and minimize the degradation caused by visitor use. The existing trail system within the park would be enhanced by closing personal trails through sensitive areas and providing improved options for users. Completing trail loops and connections with regional trail networks would remove some recreational users from within the historic core, protecting these resources and improving the experience for interpretive visitors.
4. ***Preserve important historical, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.*** The mission of the NPS, as identified in the Organic Act, is to, “conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (16 USC I).

Under Alternative A, the NPS would continue current management of the cultural and natural resources at Valley Forge NHP, basically preserving as is the resources as funding and staffing allow. This limited management of resources could lead to the loss of significant historic structures, as well as the deterioration of forest and meadow health. Heavy, unmonitored recreational use of the park would be supported by this management; however, as resources deteriorated, visitors coming to the park to enjoy the historic resources would diminish. The action alternatives would improve the management of cultural and natural resources by working closely with partners and other agencies and focusing time and money on those areas that are in need of immediate assistance

5. ***Achieve a balance between population and resource use that will permit high standards of living and wide sharing of life's amenities.*** The NPS strives to achieve a balance between population and resource use at Valley Forge NHP. With regards to visitor population and carrying capacities of the site, Valley Forge NHP would continue to meet this criterion under all the alternatives. However, for natural resources, the balance between population and resource use would deteriorate under the No-Action Alternative as the deer population continued to rise, along with the numbers of exotic invasive plants. Both action alternatives would meet this criterion by enhancing the health of the forests and meadows through active environmental restoration and determining a healthy balance between the deer and the habitats they use.
6. ***Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.*** Under Alternative A, the No-Action Alternative, no changes would be made to current management of cultural and natural resources, which could result in loss of some historic structures, as well as the current patterns of forest and meadow. Thus, this alternative would not meet this criterion. Both action alternatives would improve the management of these resources, further protecting them from loss. The health of the forests and meadows would greatly improve.

Although each of the alternatives meets the above criteria to some degree, Alternative C surpasses the other alternatives in fulfilling the criteria outlined in NEPA Section 101(b). Overall, both action

alternatives would result in adverse and beneficial impacts to resources within the park. However, Alternative C will rehabilitate portions of the cultural landscape to 18th century conditions, and it will fill the quarries within the Grand Parade, removing a physical intrusion to the understanding of the encampment landscape. Alternative C will implement traffic management initiatives beyond traffic calming by closing some public roads to visitor and through-traffic. Taking all of this into consideration, and balancing the impacts to natural and cultural resources and the population, Alternative C best meets the criteria for the environmentally preferred alternative. Alternative C was identified as the NPS Preferred Alternative in the Draft GMP/EIS and Abbreviated Final GMP/EIS and is the selected action in this ROD.

Public and Agency Involvement

On March 21, 2002, the NPS published in the *Federal Register* Volume 66 Number, 55 a Notice of Intent to prepare a GMP/EIS for Valley Forge NHP. The GMP/EIS has been developed pursuant to Sections 102(2)(c) of NEPA (Public Law 91-190) and its implementing regulations (40 CFR 1508.22). Public involvement included scoping interviews, briefings, and meetings; alternative development workshops; briefings for NPS staff and government officials; a formal public comment process; public meetings and outreach; and meetings with affected federal, state, and local governments and agencies, tribal groups, and interested organizations and individuals. These activities are briefly summarized below, and a detailed discussion is presented in Chapter 5 of the *Draft GMP/EIS*.

Scoping

During 2002, park staff and its consulting team conducted scoping interviews with key stakeholders and resource experts. The interview process also included formal requests for consultation with the USFWS, the Federal Highway Administration (FHWA), the Pennsylvania SHPO, the Pennsylvania Department of Conservation and Natural Resources, PennDOT, and Native American tribes.

Following these initial contacts, the NPS distributed its first newsletter for the project and held its first open house to discuss GMP/EIS scoping issues with the public on October 23, 2002. The park also hosted a public workshop on July 23, 2003 to focus on specific park issues to be addressed by the GMP/EIS. Following this meeting, and for the next three years, the project team continued to meet with and brief local, state, and federal officials on the project development.

Public Comment

The *Draft GMP/EIS* for Valley Forge NHP was available for public and agency review from November 3, 2006 through April 10, 2007. Copies of the document were sent to individuals, agencies, organizations, and local libraries. The document was also made available for review at the park and on the NPS Planning, Environment, and Public Comment website (<http://parkplanning.nps.gov>). Public meetings were held on February 21 and 22, 2007. Eight presentations of the plan were made to civic and interest groups and local governments. Press releases and public notices were used to announce the availability of the document, as well as the public meeting dates and times. A total of 378 commenters provided 702 comments on the *Draft GMP/EIS*.

Most comments received from individuals were non-substantive in nature and focused on bicycle use in the park. They reflected confusion about current NPS policy and/or the trails proposal of the GMP/EIS. Additional comments included

- support for the preferred alternative
- suggestions regarding park administrative, maintenance, and interpretive operations
- editorial changes

- concerns over impact analysis related to historic structure demolition, the American Revolution Center museum, re-establishment of historic viewsheds, dam removal, off-trail biking, model airplane usage, removal of parking lots, required number of law enforcement personnel, and construction across water resources and wetlands.

Due to the nature of the comments, an *Abbreviated Final GMP/EIS* was used to respond to and incorporate the comments received during the public and agency review. No changes were made to the alternatives or to the impact analysis presented in the *Draft GMP/EIS*. A Notice was published in the Federal Register by the NPS on August 17, 2007 and by the Environmental Protection Agency on August 17, 2007, announcing the availability of the *Abbreviated Final GMP/EIS* for a 30-day no action period. The 30-day no action period ended on September 18, 2007, after which this ROD was prepared and signed by the Northeast Regional Director. A Notice of Availability of the ROD will be published in the Federal Register.

Tribal Coordination

At the onset of the GMP/EIS process and prior to public review of the *Draft GMP/EIS*, the Oneida Indian Nation (New York) was contacted via letter to request formal consultation (August 8, 2002 and March 23, 2006). The Oneida were present during the 1777-78 encampment and maintain an oral tradition of their experiences with the soldiers. Twice a year, the Oneida visit Valley Forge NHP to present interpretive programs focused on their experiences during the encampment. The Oneida also meet with park staff at this time to review upcoming proposals and interpretive programs that may concern them. The park enjoys a long-standing, interpretive relationship with the Oneida Indian Nation (New York), which will continue as the new GMP is implemented.

Additional American Indian tribes were contacted via letter to initiate consultation, including the Oneida Nation of Wisconsin, the Stockbridge-Munsee Community, and the Delaware Nation. Consultation and coordination with these tribes will continue through implementation of the new GMP, as needed. This effort will also be continued through the Section 106 compliance process.

Copies of the *Draft GMP/EIS* and *Abbreviated Final GMP/EIS* were provided to each tribe; however, none of the tribes provided any comment on either document.

Section 106 Consultation

Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, requires that federal agencies consider the effect of undertakings on properties listed on the National Register and allow the SHPO and Advisory Council on Historic Preservation (ACHP) the opportunity to comment. On August 1, 2002, Valley Forge NHP sent letters to both the Pennsylvania SHPO and the ACHP to initiate consultation for the GMP/EIS. The SHPO acknowledged the request for consultation with a letter dated September 11, 2002. Informal meetings with the SHPO and staff have occurred throughout the planning process, with official updates being provided at the annual site review meetings on April 27, 2004 and May 11, 2005.

To further compliance with Section 106, the park prepared a draft PA, which lists the potential actions that may require further compliance with Section 106 of the NHPA, and identifies the necessary steps the NPS will take prior to implementation. In a letter dated April 19, 2007, the ACHP concluded that their participation in the consultation to finalize the PA was not required. They did, however, request that the final PA identify which historic buildings were to be demolished and that a copy of the executed PA be filed with their office. The Pennsylvania SHPO responded in a letter dated April 9, 2007. They concurred with the findings in the *Draft GMP/EIS*; however, they requested that mitigation for demolition of historic structures be clearly identified in the final PA. The draft PA was finalized through further

coordination with the Pennsylvania SHPO. A copy of the executed PA is appended to this ROD. A copy was also provided to the ACHP, as requested. Copies of relevant correspondence with the ACHP and the Pennsylvania SHPO are included in the *Draft GMP/EIS* and the *Abbreviated Final GMP/EIS*.

Section 7 Consultation

Section 7 of the Endangered Species Act of 1973, as amended (16 USC 1531 et seq.) requires all federal agencies to consult with the USFWS to ensure that any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of federally-listed species or critical habitat. NPS management policies also require cooperation with appropriate state conservation agencies to protect state-listed and candidate species of special concern within park boundaries.

At the onset of the GMP/EIS, the park contacted the USFWS and the Pennsylvania Natural Diversity Inventory (as administered by the Pennsylvania Department of Conservation and Natural Resources) via letter to initiate consultation and request information about special status species within Valley Forge NHP (August 7, 2002).

The USFWS noted that habitat for the federally threatened bog turtle (*Clemmys muhlenbergii*) exists within the park. In a letter dated October 29, 2002, the agency requested a habitat suitability survey if wetlands occur within or near areas of proposed impact. After review of the *Draft GMP/EIS*, the USFWS reiterated their concern regarding the federally threatened bog turtle in a letter dated May 29, 2007.

In general, the actions proposed in the selected alternative have been designed to avoid and/or minimize adverse impacts to wetlands. However, as individual actions are implemented, the park will conduct surveys for suitable habitat and consult with the USFWS, as needed. Copies of relevant correspondence with the USFWS are included in the *Draft GMP/EIS* and the *Abbreviated Final GMP/EIS*.

The review by the Pennsylvania Natural Diversity Inventory (letter dated March 14, 2003) indicated several occurrences of state species of special concern within Valley Forge NHP. As with the bog turtle, actions proposed by the GMP have been designed to avoid and/or minimize adverse impacts to these species and their habitats. As individual actions are implemented, the park will survey the specific area of potential impact and coordinate with the appropriate state agency (Pennsylvania Department of Conservation and Natural Resources, the Pennsylvania Fish & Boat Commission and/or the Pennsylvania Game Commission), if species are encountered. Copies of relevant correspondence with the state agencies are included in the *Draft GMP/EIS* and the *Abbreviated Final GMP/EIS*.

Conclusion

The above factors and considerations warrant implementing Alternative C, as described and analyzed in the *Draft* and *Abbreviated Final GMP/EIS* for Valley Forge NHP and this ROD. Alternative C provides the most comprehensive and effective method among the alternatives considered for meeting the NPS's purposes, goals, and criteria for managing Valley Forge NHP and for meeting the national environmental policy goals. The selection of Alternative C will not result in the impairment of park resources and values and will allow the NPS to preserve park resources and provide for their enjoyment by future generations.

Appendix A: Complete List of Management Objectives and Potential Actions

Table A-1 NPS Selected Action: Management Objectives and Potential Actions

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
1 Managers make decisions about resource management and protection based on professional studies and adequate planning that are consistent with applicable policies and regulation.	<ul style="list-style-type: none"> ■ Prepare historic resource studies, archeological studies, implementation plans, and other work as foundations for preservation and rehabilitation of park resources. ■ Revise the park's strategic plan in accordance with the Final GMP. ■ Prepare a Resource Stewardship Plan. ■ Complete a Phase III cultural landscape treatment plan that implements the Final GMP. ■ Monitor carrying capacity of natural and cultural resources ■ Plan, design, and implement an integrated long-term Vital Signs monitoring program.
2 Sustainable design and construction methods, techniques, and materials are used.	<ul style="list-style-type: none"> ■ Assess current practices, facilities, and available resources for sustainable design and maintenance ■ Seek LEED certification (at some level) when rehabilitating structures and facilities.
3 Boundary and land acquisition strategy is sufficient to protect the nationally significant qualities of the park	<ul style="list-style-type: none"> ■ Acquire key remaining lands within the authorized boundary, including the Saint Gabriel's field and Valley Forge Crossing. ■ Survey and review the existing utility and road easements to ensure that significant resources are protected.
4 Encampment-period earthworks and fortifications are stabilized and preserved.	<ul style="list-style-type: none"> ■ Record the positions of earthworks through global positioning. ■ Keep earthworks clear of trees. ■ Educate visitors about the significance and fragility of earthworks. ■ Route trails and roads in ways that do not encourage climbing earthworks. ■ Maintain tall grass cover to prevent erosion and discourage trampling.
5 Encampment-period buildings are preserved as is or restored or rehabilitated for interpretive purposes, while those for which there is no necessary and feasible interpretive or operational use are stabilized, preserved, and/or rehabilitated and available for visitor-service concessions and for leasing.	<ul style="list-style-type: none"> ■ As an example, continue to manage Washington's Headquarters and Varnum's Quarters as restored structures used as house museums. ■ Remove the ranger station from the Mordecai Moore House. ■ Complete a market analysis on suitable uses for buildings. ■ Implement a park-wide concessions and leasing program. ■ See Appendix D of the <i>Draft GMP/EIS</i> for full list of buildings and treatments.
6 All huts in the park are reconstructions. Two of them contribute to the National Register significance of the park and would be preserved.	<ul style="list-style-type: none"> ■ Remove those huts that do not contribute to the National Register significance of the park nor provide interpretive value.

Table A-1 NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
<p>7 Some post-encampment-period historic buildings are preserved or rehabilitated primarily for interpretive or visitor services purposes, while those for which there is no necessary and feasible interpretive or visitor services use are preserved or rehabilitated and available for concessions or for leasing, given that the determinations stipulated by 36 CFR 1/18.4 were made as part of the development of this GMP. Buildings for which there is no feasible use are considered for demolition.</p>	<ul style="list-style-type: none"> ■ As an example, rehabilitate the Maurice Stephens House (the site of Huntingdon’s Quarters) to interpret activities on the Grand Parade. ■ Complete a market analysis on suitable uses for these buildings. ■ Stabilize suitable buildings in preparation for adaptive reuse. ■ Implement a park-wide concessions and leasing program. Develop historic preservation agreements with owners of historic buildings within the park boundary to protect the significant qualities of the buildings. ■ See Appendix D of the <i>Draft GMP/EIS</i> for full list of buildings and treatments.
<p>8 Archeological sites and resources are stabilized and protected against destruction from vegetation, erosion, and inappropriate visitor use. Continuing research and fieldwork are emphasized.</p>	<ul style="list-style-type: none"> ■ Use techniques such as increased surveillance and proper routing of trails to prevent degradation through “pot hunting” and compaction. ■ Manage vegetation at archeological sites to prevent degradation through soil erosion and tree fall. ■ Educate visitors about the significance and fragility of archeological sites and resources. ■ Continue research on topics and areas of the park about which relatively little is known, including accurate locations of fortifications and picket posts, the Village of Valley Forge, slavery- related resources, charcoal-making resources on Mount Misery, and the commissary function on the north side of the park.
<p>9 The significant Revolution-era collections of Valley Forge NHP are properly housed and curated, and made accessible for research. A new collections storage facility is constructed; or part of the existing Welcome Center is rehabilitated for collections storage; or part of the collection is relocated to an off-site facility. Storage could be shared with other national parks under any of these options. To increase public access to information about the collections, the park would expand its use of the Web Catalog.</p>	<ul style="list-style-type: none"> ■ Through new construction, provide a curatorial storage and support facility with appropriate environmental, fire safety and suppression, and security conditions using technologies that conform to contemporary archival and conservation practices. ■ Complete the documentation (accession, cataloguing, and marking) of the park’s museum collection and the library collection prior to their physical move to a curatorial facility. ■ Complete the development of finding aids or other retrieval systems, so researchers and scholars can effectively use the collections.
<p>10 Historic monuments are preserved in good condition.</p>	<ul style="list-style-type: none"> ■ Establish an “adopt-a-monument” program to endow the care of existing historic monuments/statues. ■ Continue to work with existing sponsors of historic monuments.
<p>11 New monuments commemorating people who played a role in the encampment may be erected in the park provided the historic association between the person or group and the encampment is of exceptional importance. Commemoration requires the approval of the Director of the NPS and/or an act of Congress.</p>	<ul style="list-style-type: none"> ■ Consider new monuments only when they meet the criteria established by <i>NPS Management Policies 2006</i>. ■ New monuments must be endowed by their sponsor or others in order to ensure the monuments can be properly maintained over time.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
<p>12 Biological resources are managed to preserve and restore the natural abundances, diversities, dynamics, and distributions of native plants and animal populations within forested and other naturally occurring communities (such as wooded wetlands) In naturally occurring communities where species populations occur in unnaturally high or low concentrations as a result of human influences or extirpation of predators, and such occurrences cause unacceptable impacts on natural resources and natural processes, biological and physical remedial actions would accelerate natural recovery.</p>	<ul style="list-style-type: none"> ■ Identify and set a standard for ecosystem health ■ Develop and implement a forest management plan ■ Determine appropriate wildlife densities to obtain a healthy natural ecosystem. ■ Complete the survey of Valley Forge Vital Signs for naturally occurring communities. ■ Develop and implement a formal invasive species management plan. ■ Develop and implement a deer management plan. ■ Fully protect sensitive habitats associated with state-listed rare, threatened, or endangered species to protect the viability of the species population. ■ Identify key focus areas for accelerated natural recovery and develop and implement recovery plans for these areas. ■ Work with Chester County and townships to preserve Valley Creek's and Fisher's Run's values as open space corridors. ■ Limit visitor access in sensitive areas. ■ Remove hazardous materials that pose a risk to humans, wildlife, and plants. ■ Remove remaining coal silt from within the siltation basins and plant native trees and shrubs in disturbed areas or create additional wetlands. ■ Close most unauthorized trails and plant with native vegetation; a few are converted to authorized trails to give visitors access to the area, if no sensitive natural or cultural resources exist there. ■ Reforest Fuller field and Waggon seller field (south of US 422). ■ Manage select agricultural fields to encourage preservation of grassland species.
<p>13 The park participates in promoting measures to protect and enhance air quality in the Philadelphia airshed in order to mitigate the harmful effects of air pollution on natural and cultural resources, scenic vistas, and the health of visitors within the park.</p>	<ul style="list-style-type: none"> ■ Identify and mitigate causes of air pollution impacts in the park. ■ Continue to link to regional trails and information systems in order to encourage visitors to come to the park on foot or by bicycle. ■ Continue to work with the Southeastern Pennsylvania Transportation Authority (SEPTA) and the Greater Valley Forge Transportation Management Association (GVFTMA) to promote public transportation to the park. ■ Limit use of gasoline-powered equipment on high pollution days. ■ Work with local, state, and federal agencies to complete the traffic improvement measures identified in the Valley Forge Area Transportation Planning Study (VFATPS) that ensure smooth traffic flow on roads near the park. ■ Monitor physical, chemical, and biological effects and impacts to natural and cultural resources through research partnerships with subject matter experts in academia, governmental, industrial, and other organizations. ■ Submit park vehicles to emissions testing. ■ Limit vehicular traffic within the park and use energy-efficient shuttles to enable visitor access throughout the park.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
14 The park utilizes whole-watershed management strategies to protect the park's water resources. Threats to water quality both inside and outside the park are minimized and existing water quality deficiencies are improved. The park actively participates in the initiatives to protect and restore the water quality in Valley Creek. The park actively participates in local and regional initiatives that protect and enhance the water quality of the Schuylkill River and its tributaries within the park.	<ul style="list-style-type: none"> ■ Work with state and local governments and private organizations on regional initiatives that protect and enhance water quality. ■ Perform stream assessments. ■ Work with the Valley Creek Restoration Partnership to implement the restoration plan for the creek. ■ Implement long-term stream bank stabilization solutions for Valley Creek. ■ Implement Best Management Practices, including low impact development.
15 Natural hydrologic flows in the park are preserved and restored where possible.	<ul style="list-style-type: none"> ■ Study potential effects of removing the Valley Creek dam. ■ Remove the Meyer's Run, Fatlands, and Colonial Springs dams. ■ Manage stormwater to promote the natural infiltration of precipitation into groundwater. ■ Continue to work with organizations and jurisdictions that influence management of waters upstream of the park to protect against damaging storm surges. ■ Work with partners and community to restore Walnut Hill, Lamb, Fawn, and Meyer's Runs.
16 The park's caves and karst features are preserved, restored where possible, and protected where possible.	<ul style="list-style-type: none"> ■ Caves are closed to general use pending further evaluation for other designated uses. ■ Install pervious gates to prevent unauthorized entry to caves while allowing continuing use by wildlife. ■ Develop interpretive media to help visitors appreciate and understand the fragility of cave resources. ■ Cease filling sinkholes unless an important structure is threatened or in cases in which human safety cannot be protected by any other means. ■ Develop and implement a cave and karst management plan.
17 Man-made intrusions on lightscares within the park (visibility of the night sky) are minimized through working with neighbors and through actions within the park. In cases where artificial lighting is replaced or added, it is limited to those areas where security, basic human safety, and specific cultural resource requirements must be met.	<ul style="list-style-type: none"> ■ Artificial lighting is limited to those areas where security, basic human safety, and specific cultural resource requirements must be met. ■ Identify areas where artificial lighting is being used but is not necessary; remove artificial lighting from these areas and restore the natural lightscares. ■ Work with park neighbors, PennDOT, the PA Turnpike Commission, and other local/state government agencies to restore natural lightscape conditions. ■ Use minimal impact lighting techniques where artificial lighting is required.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
18 Man-made intrusions on soundscapes within the park (audibility of natural sounds) are minimized	<ul style="list-style-type: none"> ■ Identify what levels of human-caused sound are appropriate for various areas of the park. ■ Improve vegetative or other buffers adjacent to the PA Turnpike and US 422 as they are widened. ■ Use traffic calming measures to slow traffic on PA Route 23. ■ Reduce the acreage that needs close mowing or “weed whipping.” Use electric maintenance equipment where feasible ■ Remove both commuter and visitor vehicular traffic from the tour roads.
19 Rights-of-way are maintained using environmentally-sensitive techniques.	<ul style="list-style-type: none"> ■ Work with PennDOT and utility companies to determine feasible and appropriate methods consistent with park recommendations.
20 Meadows are intensively managed to enhance their habitat values.	<ul style="list-style-type: none"> ■ Complete an implementation plan to eliminate non-native vegetation and encourage native grass species to enhance both habitat and interpretive values. ■ Continue to use mowing to indicate historic field boundaries. ■ Replace boundary witness trees as they die.
21 The quarries on the Grand Parade are filled to their historic contour, restoring this essential cultural landscape at the heart of the park. Cave Quarry would not be filled, since it lies beyond the Grand Parade and because it exhibits rare geologic features.	<ul style="list-style-type: none"> ■ Fill the quarries to their historic contour, except Cave Quarry.
22 Within the overall landscape, selected areas of great interpretive value are rehabilitated to their 18th century conditions as interpretive vignettes. The cultural landscapes of two key interpretive areas are managed primarily to achieve interpretive goals: Muhlenberg’s Brigade and the Grand Parade. At other key interpretive areas: Washington’s Headquarters, Artillery Park, Star Fort/Varnum’s Quarters area, and Walnut Hill, the landscape is preserved as is and technology is used to convey historic conditions	<ul style="list-style-type: none"> ■ Rehabilitate the Muhlenberg’s Brigade area and part of the Grand Parade to their 18th century appearance. Reconstruct huts or other temporary encampment structures. ■ Program Washington’s Headquarters, Artillery Park, the Star Fort/Varnum’s area, and Walnut Hill as interpretive focus areas but preserve the commemorative landscape as is ■ Re-establish the historic contour by filling quarries at the Grand Parade (except Cave Quarry) ■ As the quarries are filled, remove the trees that have grown on their edges in order to restore the historic size and extent of the Grand Parade ■ Remove state park-era Maintenance Complex from the Grand Parade and restore historic contour. ■ Remove County Line Road and restore to its original contour ■ Establish vegetation where necessary to screen modern intrusions.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
<p>23 The major features of the cultural landscape—the terrain; historic structures; the patterns of open vs. wooded land; circulation, including public roads and major trails—are preserved as is. To support interpretive goals some features are rehabilitated. Small-scale features that contribute to the National Register significance of the park are preserved</p>	<ul style="list-style-type: none"> ■ Retain most existing wooded areas; re-establish views through the wooded areas that are essential to understanding the lay-out of the encampment and strategic value of the terrain, including views among Redoubts 1, 2, 3, and 4. ■ Re-establish views from the Star Fort to the Stony Battery. ■ Continue to delineate historic farm boundaries through mowing and preservation and replacement of boundary witness trees. Do not replace the pine plantations as they die, as they are not considered to be National Register contributing features; however, continue to maintain a planted visual buffer according to a future vegetation management plan. ■ Close Gulph Road to public traffic and restore it as a historic trace. ■ Remove little-used parking lots as well as parking lots in key interpretive viewsheds and restore the historic contour. ■ As trees that are part of alleés and commemorative plantings die, replace them, except where they are located in interpretive focus areas; replace them in kind or with native species having similar characteristics. ■ Preserve such features as berms and hedgerows that indicate historic property lines and commemorative features added during the state-park era, including reproduction huts and fences, outbuildings, and ornamental features associated with post-encampment farmsteads.
<p>24 The major features of the cultural landscape—the terrain; historic structures; the patterns of open vs. wooded land; circulation, including public roads and farm and estate roads; and major trails—are preserved as is. To support interpretive and visitor experience goals, some features are rehabilitated and limited trails are established. Small-scale features that contribute to the National Register significance of the park are preserved.</p>	<ul style="list-style-type: none"> ■ Delineate historic farm boundaries through mowing and preservation and replacement of boundary witness trees. ■ Preserve such features as berms and hedgerows that indicate historic property lines and commemorative features added during the state-park era, including reproduction huts and fences, outbuildings, and ornamental features associated with post-encampment farmsteads. ■ See Figure 2-10 in the <i>Draft GMP/EIS</i> for new trails.
<p>25 The major features of the cultural landscape—the terrain; historic structures; and circulation, including towpath, farm roads and major trails are preserved. To support natural resources goals, some areas may be reforested.</p>	<ul style="list-style-type: none"> ■ Complete a management action plan that conserves major features of the cultural landscape and sets specific ecological objectives and strategies to meet them. ■ Remove remaining coal silt from within the siltation basins and plant native trees and shrubs in disturbed areas or create additional wetlands. ■ Close most unauthorized trails and plant with native vegetation; a few are converted to authorized trails to give visitors access to the area. ■ Manage select agricultural fields to encourage preservation of grassland species. ■ Allow Fuller field and former Waggon seller field (south of US 422) to continue to progress from old field conditions to forest. ■ Complete a cultural landscape history and treatment plan for the newly acquired Waggon seller farm property north of US 422.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
<p>26 Visitors have the opportunity to decide the kind of experience they want, depending on learning style, interest, and time. The park provides a structured core message and experience for all visitors that is primarily immersive and focuses on the encampment and the American Revolution. This takes place at the Welcome Center and at the two key interpretive sites that are rehabilitated to period conditions so that visitors can experience a sense of stepping back in time. A self-discovery approach illustrates other areas of the park, and additional historic and natural resource themes and topics.</p>	<ul style="list-style-type: none"> ■ Complete and implement the comprehensive interpretive plan to match themes to specific sites ■ Provide visitors the “tools” to structure personal experiences that focus on discovery ■ Tools include excellent orientation at Welcome Center as preparation to experience the park as a multi-layered historic and natural resource; technology applications ranging from personal audio devices to virtual viewing stations; an active interpretive archeology program; limited guided tours; and a palette of participatory activities at the key interpretive sites. ■ Welcome Center provides an integrated orientation and introduction to the story of the American Revolution as a whole, to the Valley Forge story, and to options for the visitor’s experiences in the park landscape. ■ Use Welcome Center as the “trailhead” to provide easily accessible and free orientation for park visitors to themes, programs, events, and facilities, and opportunities in the park. ■ Provide extensive opportunities for visitors to interact with guides and first-person interpreters. The two vignettes are the venues for first-person interpretation and dramatic presentations.
<p>27 Interpretation emphasizes the encampment and the American Revolution. Complementary themes include other events and eras in the history of Valley Forge, as well as natural resources.</p>	<ul style="list-style-type: none"> ■ Develop and implement Comprehensive Interpretive Plan.
<p>28 Exhibit space is added to the Welcome Center to expand the capacity for displaying the park’s collections and to accommodate changing exhibits. Retail space is added to accommodate current demand and provide ore revenue for programs. A theater is added if the current theater is rehabilitated for other purposes.</p>	<ul style="list-style-type: none"> ■ Add exhibit and retail space to the Welcome Center. ■ Construct new theater if current theater is used for other purposes.
<p>29 The thematic messages introduced in the Welcome Center are reinforced throughout the park’s cultural landscape.</p>	<ul style="list-style-type: none"> ■ Six key interpretive sites are the focus of historic programming and activities in the park landscape. ■ Expand the existing Welcome Center to provide space for orientation. ■ Present exhibits and programs that convey the history and significance of the people, events, and legacy of the revolution and encampment, and the role of Valley Forge as an icon of American history. ■ Natural resources programming takes place park-wide. ■ Present exhibits and programs in the Welcome Center to convey the breadth and significance of natural resources.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
30 Visitor movement through and experience of the landscape and resources is essential to understanding the park's interpretive themes.	<ul style="list-style-type: none"> ■ Rehabilitate two vignettes to encampment-period conditions. ■ Employ a variety of visually unobtrusive methods to portray the history and activity at four key interpretive sites, including technology that allows one to superimpose a historic scene on the actual scene, printed materials, and tours and programs. ■ Eliminate the use of private vehicles on park tour roads and provide shuttle service to key interpretive sites. ■ Encourage visitors to walk, bicycle, or ride horseback among the key interpretive sites by providing information and appropriate comfort facilities, and by allowing bicycle use of park tour roads.
31 Within the overall landscape, two areas of great interpretive value (Muhlenberg's Brigade and the Grand Parade) are rehabilitated to their 18th century conditions to provide a sense of stepping back in time for visitors. Other key interpretive areas are modified for interpretive purposes.	<ul style="list-style-type: none"> ■ Rehabilitate the Muhlenberg's Brigade area and part of the Grand Parade to their 18th century appearance. Reconstruct huts or other temporary encampment structures. ■ Program Washington's Headquarters, Artillery Park, the Star Fort/Varnum's Quarters area, and Walnut Hill as interpretive focus areas but preserve the commemorative landscape. ■ Re-establish historic views at Redoubts 1, 2, 3, and 4, and from the Star Fort to Stony Battery ■ Re-establish the historic contour by filling quarries at the Grand Parade (except Cave Quarry). ■ Provide small-scale re-enactment activities at Grand Parade and Muhlenberg's Brigade. ■ Establish vegetation where necessary to screen modern intrusions.
32 With the exceptions of Muhlenberg's Brigade, the Grand Parade, and the quarries, the park-wide landscape is preserved as is and technology is used to convey historic conditions.	
33 Reconstructed earthworks and fortifications are preserved as interpretive exhibits.	
34 Views among historic redoubts are re-established through selective tree cutting, so that visitors can better understand the strategic use of the terrain during the encampment.	<ul style="list-style-type: none"> ■ Re-establish historic views at Redoubts 1, 2, 3, and 4, and from the Star Fort to Stony Battery.
35 All huts in the park are reconstructions. Two of them contribute to the National Register significance of the park. The rest are interpretive exhibits and would be managed as ephemeral exhibits.	<ul style="list-style-type: none"> ■ Remove those huts that do not contribute to the National Register significance of the park nor provide interpretive value.
36 Education is a core function of the park, which is a living classroom. Cultural and environmental education is provided in partnership with key organizations. Indoor and outdoor space for education programs is added.	<ul style="list-style-type: none"> ■ Work with partners to develop and present a range of educational programs, including guided tours, curriculum-based programs for schools, web- or cable-based distance learning, internships for older students, interactive CDs, teacher training and institutes, adult education, lecture series, symposia, etc ■ Provide resource- and collections-based cultural programming in the park based on current exhibits ■ Work with Mill Grove Audubon Center and other institutions and schools to provide resource-based environmental education in the park.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
37 The park's collections help to illustrate Valley Forge encampment themes.	<ul style="list-style-type: none"> ■ Organize and display the collections to illustrate and enhance the interpretive themes. ■ Continue to use Washington's Headquarters and Varnum's Quarters to display those items that convey a more detailed story than those in the Welcome Center.
38 To enhance the visitor experience and understanding of the park, existing and potential visual intrusions are minimized.	<ul style="list-style-type: none"> ■ Use existing and augmented vegetative buffers to screen existing and new visual intrusions along the perimeter of the park. ■ Buffers are defined, delineated, and actively managed to protect resources from possible damage or deterioration and to maintain the tranquility of the remainder of the site's landscape ■ Work with PECO to bury remaining overhead electrical lines. ■ Work with neighboring townships to ensure new construction is adequately screened. ■ Work with PennDOT and the PA Turnpike Commission to screen US 422 and the Turnpike as they are widened.
39 Park visitors are actively encouraged to visit key sites and districts within the area and to understand their relationship to Valley Forge.	<ul style="list-style-type: none"> ■ Work with managers of Revolutionary War sites and other historic and natural sites that convey themes related to those of Valley Forge on joint programming and promotion.
40 Natural resource education on stewardship and contemporary resource preservation is essential.	<ul style="list-style-type: none"> ■ Park staff ensure the availability of natural resource interpretation and educational programs by developing objectives, targeting the best partners, and facilitating partner operations in the park. ■ Establish partnerships with schools, institutions, and other partners who can use the park's natural landscape to provide programming. ■ Continue to work with Mill Grove Audubon Center on potential for rehabilitating north side structures as educational facilities. ■ Present exhibits and programs that convey the history and significance of Valley Forge as a national park with a diversity of significant resources, its role in maintenance and recovery of native biodiversity, and its role throughout time in its broader ecological contexts.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
41 Visitors enjoy a safe and secure experience at Valley Forge NHP.	<ul style="list-style-type: none"> ■ Establish a “park watch” volunteer program. ■ Remove little-used parking lots that attract illicit use. ■ Relocate bicycle traffic to the tour roads. ■ Complete the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process for the asbestos release site that sets priorities and methods for asbestos remediation ■ Fully mitigate the asbestos so public and environmental health is protected, and there is full public use of the park. ■ Remove other hazardous materials that pose a risk to humans, wildlife, and plants. ■ Ensure all park facilities and structures are maintained according to applicable regulations for use as visitor facilities. ■ Mitigate health and safety risks of all facilities and structures according to a comprehensive integrated pest management plan and program. ■ Staff law enforcement commensurate with levels and patterns of visitation.
42 Prospective visitors are able to obtain timely and relevant information to help in trip planning and travel to the park.	<ul style="list-style-type: none"> ■ Keep the park website current and user-friendly, and ensure that it is linked to other sites that allow the public to find it. ■ Continue to work with Valley Forge Visitors and Convention Bureau to develop and distribute information on facilities and activities at the park and related sites. ■ Continue to work with PennDOT and the PA Turnpike Commission to ensure adequate and accurate directional signage on highways. ■ Improve the content and availability of bike and hiking information available to visitors on the web, in printed materials, and at trailheads.
43 Visitor services and facilities are appropriately scaled and located, and they facilitate enjoyable and educational visits to the park	<ul style="list-style-type: none"> ■ Park continues to provide limited events and programs ■ A cooperator provides retail sales and limited food service. ■ Ensure that accessible restrooms are available at key interpretive areas and major trail heads. ■ Retain parking areas located near key interpretive sites ■ Complete a market analysis to assess the potential for using existing park structures for visitor services such as lodging or food service. ■ Establish a picnic area for school groups adjacent to the Welcome Center ■ Monitor visitor satisfaction in terms of facilities used for recreation, including trails and parking lots.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
<p>44 A trail system is established that combines existing trails and limited new trails to provide a variety of visitor experiences related to and appropriate to park resources. New trail segments are established where they meet the following goals and criteria:</p> <ul style="list-style-type: none"> – provide safe access to key features – make loop circulation possible – provide good experience or interpretive value – easily maintainable – trailhead available or feasible to make available – no cultural or natural resources are affected 	<ul style="list-style-type: none"> ■ Establish and/or formalize connections that create loop trails. ■ Complete a historic resource study and treatment plan for those trails that are known to be historic. ■ Evaluate trail system for accessibility and ensure appropriate level of accessibility to the extent possible ■ Ensure that trailheads are adequately served by parking, rest facilities, and information in order to serve visitor needs and prevent resource damage. ■ Establish a new pedestrian/bicycle bridge over the Schuylkill River to connect the trail systems of the north and south sides of the park. ■ Eliminate the currently authorized and unauthorized trails that are unmaintainable and/or that damage cultural or natural resources. ■ Publicize the formal trail system (as defined by this GMP) through public information. ■ Improve the content and availability of trail information available to visitors on the web, printed materials, and at trailheads. ■ Facilitate a program of vigorous volunteerism to enhance and maintain trails, trails information, and patrolling. ■ Develop more interpretive activities for trail users. ■ Monitor the volume of visitor use on trails to ensure that carrying capacity is not exceeded. ■ See Figure 2-10 in the <i>Draft GMP/EIS</i> for a map of the proposed trail system.
<p>45 Inner Line and Outer Line Drives are closed to private vehicles and are used as bike trails, reducing conflicts on the Joseph Plumb Martin Trail.</p>	<ul style="list-style-type: none"> ■ Close Inner Line Drive and Outer Line Drive to public vehicular traffic.
<p>46 Active recreation is limited to pedestrian trails that skirt the interpretive focus zones.</p>	<ul style="list-style-type: none"> ■ Eliminate active recreation from interpretive focus zones by siting recreational paths outside the zones and using vegetative screens.
<p>47 Appropriate recreational use continues to be welcomed in places where it does not impact resources or interpretive activities. All public activities and events are systematically evaluated for appropriateness before they are allowed.</p>	<ul style="list-style-type: none"> ■ Provide information and interpretation about park history and cultural and natural resources specifically targeted to recreational visitors. ■ Use official NPS criteria to evaluate if and when uses are compatible with resource protection. ■ Cooperate with local organizations and governments to find alternative locations for incompatible events. ■ Continue to prohibit uses that damage park resources and/or do not contribute to public understanding of park history and resources.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
<p>48 Connections to existing and future trails outside the park are pursued to encourage visitors to arrive through non-motorized means.</p>	<ul style="list-style-type: none"> ■ Establish a Wilson Road connection to the future Chester Valley Trail. ■ Continue to work with Montgomery County on management of parking, signage, and user information for the Schuylkill River Trail. ■ Continue to work with Upper Merion Township on a trail connection at the eastern end of the park. ■ Strengthen relationship with Horseshoe Trail Coalition to address issues of signage, authorized use, and user information. ■ Monitor the volume of visitor use on trails to ensure that carrying capacity is not exceeded.
<p>49 Traffic circulation is managed in a way that reduces impacts on park resources and provides for safe visitor use, while mitigating intrusion of auto traffic on the visitor experience. Visitor and commuter traffic through the park is minimized.</p>	<ul style="list-style-type: none"> ■ Work with PennDOT, the counties, FHWA, and the Delaware Valley Regional Planning Commission (DVRPC) to implement findings of VFATPS ■ PA Routes 252 and 23 remain public roads and receive traffic calming measures according to VFATPS park options 1 and 6. ■ Implement VFATPS park option 5 by installing a single-point westbound fly over at Pawling’s Road and US 422. ■ Continue to support implementation of the Schuylkill Valley Metro. ■ Re-open the Port Kennedy station within the park for non-commuter use. ■ Close Inner Line Drive and Outer Line Drive to public vehicular traffic. ■ Close Gulph Road permanently to public vehicular traffic. ■ Establish a shuttle to carry visitors to those parts of the park that are not accessible by private vehicles ■ Ensure continued access for emergency vehicles on closed roads. ■ Re-open link between Outer and Inner Line Drives for shuttle use only. ■ Remove parking lots from the cultural landscape.
<p>50 The primary park gateway provides a sense of arrival and clearly understood circulation route to the visitor’s destination in the park. As part of the River Crossing Complex of US 422 projects, a half-mile portion of PA Route 23 between Trooper Road and Outer Line Drive would be shifted to the eastern boundary of the park. The primary park entrance also would be shifted eastward. Redesign of this area would provide a clearly marked entrance and better sense of arrival as visitors exit the busy surrounding roads and enter the park. An entrance sign and landscaping would be added. The entrance drive would be reconfigured as needed to accommodate the proposed relocated maintenance facility. Additional gateway treatments at other park entrances would help to establish a recognizable sense of place.</p>	<ul style="list-style-type: none"> ■ Establish a new primary gateway in response both to the reconfiguration of the US 422/PA Route 23 interchange and also the replacement of the Betzwood Bridge. ■ Establish appropriately scaled and recognizable entrances from Pawlings Road, Audubon Road, Yellow Springs Road, Thomas/Gulph Road, North Gulph Road, and PA Route 23. ■ Coordinate signage, landscaping, and imagery at all park entrances—both vehicular and trail—to establish a recognizable sense of place.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
51 Regional traffic congestion on local roads would be reduced through construction of a half-diamond interchange at the intersection of Pawlings Road with US 422, as proposed in the <i>Phoenixville Area Intermodal Transportation Study</i> (DVRPC 2003). The interchange would be located in land within the legislated park boundary.	<ul style="list-style-type: none"> ■ Construct half-diamond interchange at the intersection of Pawlings Road and US 422.
52 NPS would continue to support implementation of the proposed Schuylkill Valley Metro. The park's Port Kennedy station would be re-opened for visitor (not commuter use).	<ul style="list-style-type: none"> ■ Re-open the Port Kennedy station within the park for visitor use.
53 The north side is programmatically integrated with the south side, making it more accessible to visitors while protecting its special qualities.	<ul style="list-style-type: none"> ■ Use signage and appropriate gateway design to clarify park entrances. ■ Establish a new pedestrian/bicycle bridge over the Schuylkill River to connect the trail systems of the north and south sides of the park. ■ Connect the north side of the park to the south side of the park programmatically, through interpretation. ■ Designate the north side as a distinct ranger district in order to better manage visitor use and impacts.
54 The River Trail, the Schuylkill River Trail, the parking and support for the trailheads at Betzwood and Pawling's Road are managed to enhance their recreational values, while not impairing the cultural and natural values of lands adjacent to them	<ul style="list-style-type: none"> ■ Establish a new pedestrian/bicycle bridge over the Schuylkill River to connect the trail systems of the north and south sides of the park. ■ Work with PennDOT to establish a pedestrian/bicycle crossing over or under US 422 from the Schuylkill River Trail to the Fatlands/Waggonseiler's area. ■ Monitor the volume of visitor use of these trails to ensure that carrying capacity is not exceeded. ■ Focus volunteer effort on maintenance and patrol of these trails to discourage damaging off-trail use ■ Establish water trail landings.
55 Staffing from all sources is adequate in numbers and deployment to implement and support the management objectives	<ul style="list-style-type: none"> ■ Hire additional staff and re-allocate staff as needed. See Appendix H for details. ■ Work with volunteers.
56 Employees continue to hold key responsibility in protecting the resources in the park as well as reducing the threats caused by improper use or development of such resources. Employees are responsible not only to achieve the park mission of preservation and interpretation, but also to encourage engagement of the community in the mission.	<ul style="list-style-type: none"> ■ Every employee develops a personal stewardship goal for engaging the community. ■ Monitor programs to track stewardship ■ Augment volunteer program to assist with stewardship efforts.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
57 Existing park partnerships are maintained and strengthened to expand the park's capacity to protect park resources and provide high quality visitor interpretation and experiences. Additional partnerships are actively pursued.	<ul style="list-style-type: none"> ■ Numerous actions result. Among the major initiatives that would be accomplished through partnerships are the following: ■ Organize and allocate park staff to facilitate development and management of partnerships ■ Coordinate visitor services, interpretive, and educational operations with other partners to ensure the broadest audience is reached with highest quality services at the best cost. ■ Continue to work with the PennDOT, FHWA, DVRPC, Chester and Montgomery Counties, and the five townships to manage traffic congestion in and around the park and to implement preferred transportation options as identified in this GMP. ■ Continue to work with SEPTA and GVFTMA to implement alternative transportation options that reduce traffic volume and congestion. ■ Continue to work with partners such as commonwealth agencies, the Schuylkill River National & State Heritage Area, the two counties, and numerous private organizations on joint initiatives for cultural and natural resources education; long-distance trails management; and natural resources management, particularly in regard to themes and resources that extend beyond park boundaries. ■ Take a lead in the initiatives to protect and restore the quality of the Valley Creek watershed. ■ Actively participate in local and regional initiatives that protect and enhance the quality of the Schuylkill River watershed. ■ Work with other NPS Revolutionary War sites and with historic sites in the region on promoting joint interpretation and visitation.
58 The scope and contribution of volunteer programs in resource management, interpretation and visitor services, maintenance, and administration are enhanced. Programs provide life-long opportunities for citizens to take personal responsibility to care for our heritage.	<ul style="list-style-type: none"> ■ Organize and allocate park staff to build and manage volunteer programs. ■ Continue to work with current volunteer groups to expand and enhance the effect of their services to the park by providing training, support, recruitment, and other services. ■ Increase the use of interns from organizations such as the Student Conservation Association, local colleges, and high schools.
59 The park actively seeks non-appropriated funds to support its preservation and interpretation mission.	<ul style="list-style-type: none"> ■ Organize and allocate staff resources to facilitate obtaining alternate support, such as through cooperative and interagency agreements, grants, donations, cost recovery, concessions, fees, earned income, and similar opportunities.
60 Revenues from universal visitor use fees help the park to meet its preservation and interpretation missions	<ul style="list-style-type: none"> ■ Evaluate options for a fee structure that provides reasonable fees, paid by all park visitors, and easily collected. ■ Fees may be charged for selected special services, such as guided park bus tours.
61 The park's utilities infrastructure is updated to meet current safety and efficacy standards, and maintained in good working order.	<ul style="list-style-type: none"> ■ Complete a master utilities survey of the existing utility infrastructure to determine easement locations, capacities, and existing demands.

Table A-1

NPS Selected Action: Management Objectives and Potential Actions (continued)

Management Objective	Examples of Appropriate Actions That May Result from Management Objectives
62 Park staff, volunteers, interns, contractors, and partners work in a safe and secure environment.	<ul style="list-style-type: none"> ■ Ensure all park facilities and structures are maintained according to applicable regulations for use as office, laboratory/curation work space, etc. ■ Mitigate health and safety risks of all facilities and structures according to a comprehensive integrated pest management plan and program.
<p>63 Some non-contributing buildings in the park for which there are suitable and feasible interpretive, visitor services, or park operational uses are maintained in good condition and/or renovated for continuing park use.</p> <p>Non-contributing buildings that are not needed or suitable and feasible for interpretive, visitor services, or park operational uses are available for concessions or for leasing, under the determinations stipulated by 36 CFR 1/18.4 that were made as part of the development of this GMP. Buildings for which there is no feasible use are demolished.</p>	<ul style="list-style-type: none"> ■ Renovate the current Welcome Center as a collections storage and curatorial support facility ■ Renovate the existing Theater building for administrative offices. ■ Continue to use the Young Adult Conservation Corps (YACC) garage and the Fatlands garage for remote maintenance storage. ■ As conditions and the needs of park operations change through the years, evaluate additional modern structures for inclusion in the leasing program. ■ Demolish buildings which have no feasible use and which do not contribute to the National Register significance of the park, for example, the amphitheater and the maintenance facility within the Grand Parade.
64 The park housing program meets service-wide objectives: buildings in the park are used for staff housing only when occupancy provides security (in terms of timely response to park protection needs, ensuring reasonable deterrence to prevent threats to park resources, or protecting the health and safety of park visitors); is essential to staffing (transitory or seasonal staff, volunteers, essential cooperators); or sustains a historic structure for which there is no feasible use.	<ul style="list-style-type: none"> ■ Ensure that bi-annual housing plan includes strategies for continual reduction of the number of current housing units until this objective is met
65 The park maintenance facility is relocated near the administration building on a site that does not impair a core historic landscape and provides adequate and safe space to accomplish work efficiently.	<ul style="list-style-type: none"> ■ Remove the maintenance complex from the asbestos quarry on the Grand Parade. ■ Construct a new maintenance facility on adjacent to Steuben Memorial Information Center or at Cinder Lane or adjacent to the County Line/PA Route 23 intersection.
66 The ranger station is relocated near the administration building in an adequate and safe space to accomplish work efficiently. It is co-located with the new maintenance facility or established within the current theater.	<ul style="list-style-type: none"> ■ Relocate the ranger station to a location within the park support zone that provides good access to the park, and adequate and secure space for operations.

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**Appendix B:
Executed Programmatic Agreement**

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Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

June 28, 2007

Deirdre Gibson
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406-1009

TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: ER 07-1929-029-A
NPS: Programmatic Agreement, Valley Forge National Historical Park

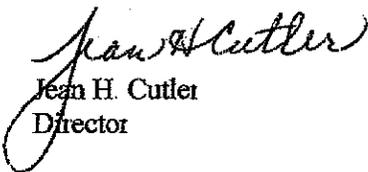
Dear Ms. Gibson:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

The State Historic Preservation Office has executed the enclosed Programmatic Agreement. Please forward the Agreement to the Advisory Council on Historic Preservation for acceptance.

If you need further information in this matter please consult Ann Safley at (717) 787-9121.

Sincerely,


Jean H. Cutler
Director

JHC/ias

**PROGRAMMATIC AGREEMENT AMONG THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICE
AND
VALLEY FORGE NATIONAL HISTORICAL PARK,
NATIONAL PARK SERVICE**

**FOR IMPLEMENTATION OF THE VALLEY FORGE NATIONAL HISTORICAL
PARK GENERAL MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT**

WHEREAS, the National Park Service ("NPS") manages and administers the Valley Forge National Historical Park (hereafter, "the park") as a unit of the National Park System and is responsible for preserving, restoring, maintaining, and interpreting the cultural resources of the park unimpaired for the enjoyment of future generations; and

WHEREAS, the NPS has entered into a Nationwide Programmatic Agreement with the Advisory Council on Historic Preservation ("Council") and the National Conference of State and Historic Preservation Officers, dated October 1995, to carry out its Section 106 responsibilities with respect to the management of park areas; and

WHEREAS, the Nationwide Programmatic Agreement encourages development of park specific programmatic agreements to supplement the provisions of the Nationwide Programmatic Agreement; and

WHEREAS, the park is nationally significant as the site of the 1777-78 encampment of the Continental Army, and the commemoration of the event; and

WHEREAS, the purpose of the park is to educate and inform present and future generations about the sacrifices and achievements of General George Washington and the Continental Army at Valley Forge, and the people, events, and legacy of the American Revolution; preserve the cultural and natural resources that embody and commemorate the Valley Forge experience and the American Revolution; and provide opportunities for enhanced understanding; and

WHEREAS, the mission of the park is to educate the American people about one of the most defining events in our nation's history and preserve the natural and cultural resources that commemorate the encampment of the Continental Army at Valley Forge in 1777-78; and

WHEREAS, in 2007, after conducting new research and analysis and following public review and comment, the National Park Service will adopt a new *General Management Plan* ("GMP") in accordance with NPS *Directors Order # 2: Park Planning* Section 3.3 1.0 General Management Planning; and

WHEREAS, the NPS in consultation with the Pennsylvania State Historic Preservation Officer ("SHPO") and Council has determined that the undertakings described in the GMP may have an effect upon properties either listed on or eligible for listing on the National Register of Historic Places ("National Register"); and

WHEREAS, as part of the GMP process, the NPS has identified various parties that were invited to participate in the development of this Programmatic Agreement; and

WHEREAS, the National Historic Preservation Act of 1966, as amended ("NHPA") governs the treatment of archeological and historic properties; that NPS recognizes its responsibilities in executing provisions of Sections 106 and 110 of that Act; and that *Director's Order 2: Cultural Resource Management Guidelines* outlines NPS policy in regard to the preservation and treatment of archeological, cultural, and historic properties within the park;

NOW, THEREFORE, the park, Council, and the Commonwealth of Pennsylvania acting through the Pennsylvania SHPO mutually agree that the NPS will carry out its Section 106 responsibilities with respect to management of the park and implementation of the GMP in accordance with the following guidelines:

STIPULATIONS

The NPS will ensure that the following measures are carried out:

I. POLICY

- A. In General:** NPS will continue to preserve and foster appreciation of the cultural resources in its custody through appropriate programs of protection, research, treatment, and interpretation. At the park, NPS will adhere to relevant provisions of the NHPA, National Environmental Policy Act ("NEPA") and other such laws, regulations, and policy guidelines cited in Section I of the Nationwide Programmatic Agreement for Compliance with Section 106 of the NHPA (effective October 1 1995).

II. IDENTIFYING CULTURAL RESOURCES

- A. SHPO Coordination:** NPS will coordinate with the SHPO activities for research related to resource management needs and identification, evaluation, and registration of park historic and prehistoric properties. NPS fulfills these responsibilities under Sections 106 and 110 of the NHPA; and the Nationwide Programmatic Agreement with respect to such properties and sites located within the legislative boundary of the park.
- B. Inventory of Cultural Resources:** To this end and in conformance with other NPS policy and practices, NPS will maintain a current inventory of prehistoric and historic properties and resources known to exist within the park's legislative boundary.
- C. National Register/National Historic Landmark Documentation:** Consistent with the NPS Management Policies, NPS will complete an update of the National Register or National Historic Landmark documentation for the park, including its nationally significant cultural landscapes. Among other things, the documentation will identify component landscape features, buildings, sites, structures, and objects that contribute to the national significance of the park.

III. DELEGATION OF AUTHORITY

- A. Park Superintendent:** Consistent with the Nationwide Programmatic Agreement, the park Superintendent is the "responsible agency official" as defined in 36 CFR Section 800.2(a) for purposes of Section 106 compliance. The Superintendent is accountable for the performance of Section 106 compliance through standardized NPS performance and program evaluation procedures at the park.

- B. 106/NEPA Committee:** In conformance with Stipulation VIII of the Nationwide Programmatic Agreement, subject matter specialists will provide the Superintendent with advice and technical services for cultural resource issues relating to Section 106 compliance. To this end, the responsible entity within the park to perform this function is the park 106/NEPA Committee (hereafter the Committee) chaired by a professional staff coordinator appointed by the Superintendent. The Section 106 Coordinator will be responsible to coordinate and monitor the park's Section 106 compliance process and to prepare such periodic reports as deemed necessary and appropriate
- C. Consulting Parties:** It is hereby agreed that, irrespective of the programmatic exclusions in this agreement, the SHPO and/or Council may at any time request consultation on programmatic and project matters where they wish to participate as a "consulting party" within the scope and meaning of their respective roles, as defined in NHPA and Council regulations.

IV. PROJECT/PROGRAM AND PROGRAMMATIC EXCLUSIONS

- A. Standard Programmatic Exclusions pursuant to the Nationwide Programmatic Agreement:** Undertakings consistent with the GMP for the park will be reviewed for Section 106 purposes within the NPS, without further review by the Council or the SHPO, provided:
- That these undertakings are based upon information adequate to identify and evaluate affected cultural resources (except for IV.B.(5), acquisition of park lands);
 - That the NPS finds that their effects on cultural resources listed on or eligible for listing on the National Register will not be adverse based on criteria in 36 CFR Section 800.5;
 - That the decisions regarding these undertakings are made and carried out in conformity with applicable policies, guidelines, and standards as identified in Stipulation I of the Nationwide Programmatic Agreement, as well as the Commonwealth of Pennsylvania's *Guidelines for Archeological Survey* and other applicable policies, guidelines and standards, and are documented by NPS using the form for "Assessment of Actions Having and Effect on Cultural Resources" or another appropriate format;
 - That NPS provides 36 CFR (Part 61-Appendix A) qualified subject matter experts who provide advice and consultation to the Superintendent regarding these matters;
 - That all actions are subject to the additional stipulations included in IV B. and IV C. of this agreement.

The standard stipulations include:

1. **Preservation Maintenance**, including housekeeping, routine and cyclic maintenance, and stabilization as defined in *Directors Order #28*. At the park, those activities include housekeeping, routine and cyclic maintenance, and stabilization of the park's historic structures or features, such as historic houses and outbuildings, fences and stone walls, and cannons and cannon carriages. In

addition, routine preservation and restoration of monuments, tablets, statues, and memorials may be reviewed under the terms of this section. Section IV.C.(1)(j) includes stipulations regarding more complex preservation and restoration.

2. **Routine Grounds Maintenance**, such as grass cutting and tree trimming. At the park, this includes activities such as grass replanting, management of commemorative trees (replacement and maintenance), woodland and woodlot management (including tree trimming and hazard tree removal, woodlot thinning, routine removal of exotic or non-historic introduced species) and maintenance or replacement in-kind of existing and contributing natural historic landscape components and features.
3. **Environmental Monitoring**, such as installation of environmental monitoring units for monitoring water, air, or other environmental quality.
4. **Archeological Monitoring and Testing**, investigations of historic structures and elements of the park's component cultural landscapes identified in the park's GMP that involve ground disturbing activities or intrusion into historic fabric for research, resource management, or inventory purposes
5. **Land Acquisition or Disposition**, including acquisitions of lands or interests in lands for park purposes, including easements or additions
6. **Roads and Trails**, including rehabilitation of existing trails, walks, paths, and sidewalks within previously disturbed areas, or repaving of existing roads or existing parking areas within previously disturbed areas.
7. **Utility Lines**, including placement, maintenance, or replacement (including burying) of utility or transmission lines and fences within utility easement corridors, in documented archeological sites, and/or previously disturbed areas.
8. **Cultural Landscape Rehabilitation**, including rehabilitation and preservation work limited to actions for retaining and preserving, protecting, maintaining, restoring, repairing, and replacing in kind materials and features, consistent with the *Secretary of the Interior's Standards for Rehabilitation* and accompanying guidelines.
9. **Health and Safety**, including activities such as radon mitigation, removal of asbestos, lead paint, buried oil tanks, and removal of HAZMAT materials within previously disturbed areas.
10. **Detection/Suppression Systems**, including installation of fire detection and suppression systems, security alarms systems and upgrading (or installation) of HVAC systems in historic structures
11. **Interpretive Media**, including erection of signs, wayside exhibits, plaques, and other interpretive media that facilitates greater understanding by the visiting public of the park and its resources.

12. Use of Historic Properties for Park Administrative Purposes, Leasing and Employee Housing, provided proposed treatments are limited to and consistent with IV A 1, 8, 9, and 10 and other activities excluded under IV A and B.

B. Park Specific Stipulations – Consultation Requirements: Consistent with Stipulation IV D., V B., and VI.C. of the Nationwide Programmatic Agreement, NPS and SHPO hereby further stipulate the following cultural resource consultation requirements and with respect to the park:

1. **In general:** Parties to this agreement recognize that the purpose of this section is to continue an active program of consultation with the Council and the SHPO with respect to major programs and projects that implement aspects of the approved GMP. NPS will submit major contemplated actions to the Council and the SHPO for review.
2. **Specifically:** It is further recognized that it is mutually beneficial to avoid repetitive consultation, especially for routine or reoccurring preservation maintenance or restoration efforts that incrementally fall within the scope of the approved GMP. To this end, the parties agree to the following consultation requirements described in the following chart:

ITEM	CONSULTATION REQUIREMENT
Prepare historic resource studies, archeological studies, implementation plans, and others as foundations for preservation or rehabilitation of park resources	SHPO review
Develop a forest restoration plan	SHPO review
Remove Valley Creek dam and dams in other creeks	SHPO review
Ground disturbing activities to restore Valley Creek and other creeks	SHPO review
Develop a park-wide cultural landscape treatment plan	SHPO review
Project-related archeological investigations, except as stipulated in IV.C.1.c	SHPO review
Rehabilitate historic structures	SHPO review of historic structure reports (HSRs) and actions as stipulated in IV.C.1.j
Demolish historic structures as noted in Appendix D of the GMP/EIS, limited to P C. Knox Bath House, Blain House Smelting Shed/Outbuilding, Boyer Barn, Haney House, Haney Garage, Nichols House, Nichols Garage, Robert McCurdy House, Robert McCurdy Garage, David McCurdy House, David McCurdy Garage, Samuel Brittain Sr House, Rose Cottage, Midgely Garage, Evans House, Evans Garage, Wallace House, and the Maintenance buildings.)	SHPO review of mitigation. All contributing structures were physically surveyed and described during the List of Classified Structures Field Inventory. To mitigate the adverse effect of demolition of these contributing historic structures, scaled, face-on photographs of each façade of

ITEM	CONSULTATION REQUIREMENT
	each structure will be taken. A set of these photographs will be provided to the SHPO.
Establish new trail segments; establish pedestrian bridge over the Schuylkill River	SHPO review
Design and implement a new park gateway at the intersection of US 422 and PA Route 23	SHPO review
Design and implement traffic elements identified in the GMP	SHPO review as stipulated in IV.C.1.f
Siting and design of a relocated maintenance facility and ranger station, unless sited in adaptively reused modern structure	SHPO review

C. Park Specific Stipulations -- Programmatic Exclusions:

1. **Conformance with GMP:** In addition to the stipulations listed in IV A, and consistent with Stipulation IV D, V B, and VI C of the Nationwide Programmatic Agreement, all cultural resource management proposed actions in the approved GMP/EIS will be treated as Programmatic Exclusions, subject to the following conditions and/or stipulations:
 - a. **Clearing and/or Thinning of trees:** Clearing and/or thinning of trees to restore viewsheds among Redoubts 1, 2, 3, 4, the Star Fort, and Stony Battery for interpretive purposes will not require additional SHPO review. Clearing and/or thinning of trees to preserve earthworks will not require additional SHPO review. Clearing of trees surrounding the quarries on the Grand Parade will not require further SHPO review. It is mutually understood that tree clearing that is not described in the GMP and that totals over 20 acres in any location will trigger SHPO review.
 - b. **Planting of Trees:** Replacement of trees that contribute to the commemorative landscape will not require SHPO review. Adding or augmenting tree screens along the Pennsylvania Turnpike or US 422 will not require further SHPO review. Implementation of the future cultural landscape treatment plan will not require further SHPO review.
 - c. **Archeological Investigations:** In general, NPS studies (funded or sanctioned) archeological inventory surveys, site reports, and SAIP maps, archeological investigations of historic or prehistoric archeological sites within the park's legislative boundary including routine salvage activities, investigations of a short duration (two weeks or less) or archeological testing/mitigation resulting from routine "compliance" testing associated with maintenance or resource management activities, will not be subject to further SHPO review. Section 106/NEPA compliance-driven archeological investigations of historic resources (historic structures and archeological sites) designed to maintain or rehabilitate these will not be subject to further SHPO review, provided a research

design has been prepared and approved by the Superintendent Stabilization and preservation of archeological sites will not be subject to SHPO review.

- d. **Curation and Storage of Archeological Remains:** NPS may enter into cooperative agreements with private museums, educational organizations, or other nonprofit or governmental entities to de-accession, warehouse, or otherwise provide for the long-term storage of both prehistoric and historic archeological collections with such cooperating or regional repositories. Agreements and plans consistent with the goals and objectives of the park GMP will not be subject to SHPO review.
- e. **Collections and Artifacts:** Relocation implementation plans for the park collections and archives will not be subject to SHPO review.
- f. **Historic Trails and Roads:** Restoration or rehabilitation of historic trails and roads will not require SHPO review. The closing of park tour roads to vehicular traffic will not require SHPO review. Traffic calming measures as described in the GMP will not require further SHPO review. Removal of County Line Road will not require further SHPO review.
- g. **Monuments:** Unless contemplated monument restoration treatment extends significantly beyond that of routine cleaning or repairing (i.e. restoration requires the advice of a professional monument conservator or non-Service consultant for treatment recommendations) restoration or rehabilitation of individual monuments will not be subject to further SHPO review.
- h. **Partner Agreements:** Cooperative agreements partners for GMP-sanctioned programs and activities including agreements for the adaptive reuse of historic structures for non-profit undertakings such as employee housing, visitor contact, or museum/educational facilities will not be subject to SHPO review.
- i. **Historic Structures:** In general, rehabilitation of exteriors/interiors of historic buildings to provide a better means of interpretation or facilitate park management goals will not be subject to further SHPO review.
- j. **Historic Buildings/Features/Landscapes:** Preservation, restoration, or rehabilitation for adaptive reuse of cultural resources for interpretive or administrative purposes and that are consistent with the GMP are not subject to SHPO review. With the exception of the Hospital Hut, huts are not historic structures, and maintenance or removal of huts will not be subject to SHPO review. The filling of quarries on the Grand Parade to their historic contour will not be subject to further SHPO review. At the park, this would include actions that are consistent with the management prescriptions identified in the approved GMP and subsequent cultural landscape treatment plan for preserving and maintaining the park and its component landscapes. In addition, actions to preserve features that contribute to the battlefield landscape may be reviewed under the terms of this section.
- k. **Leasing/Employee Housing:** The use of historic structures on the List of Classified Structures and currently used or identified in the GMP to be used for leasing and/or employee housing will not be subject to further SHPO review.

1. **Historic Preservation Agreements:** Historic preservation agreements (including deed restrictions where appropriate) with individual owners of historic buildings or improved properties to support historic preservation and limit inappropriate development will not be subject to further SHPO review.

2. For any undertaking listed above for which an adverse effect is predicted, NPS and the SHPO would discuss and come to a letter agreement on suitable mitigation. In some cases, at the request of either NPS or the SHPO, formal Section 106 consultation under 35 CFR 800.6 would be instituted.

V. DOCUMENTATION OF ACTIONS:

A. **Documenting "Undertakings":** Park related "undertakings" that may have an effect on cultural resources will be appropriately documented in accordance with section VII of the Nationwide Programmatic Agreement. The park 106/NEPA Coordinator will maintain active files and the park archives will retain archived copies of all review documents.

VI. COOPERATION AND COMMUNICATIONS:

A. **106/NEPA Committee:** Subject to oversight by the park Superintendent, the chair of the park Committee (or other designated individual) may function as the park Section 106 Coordinator and may be empowered to: 1) decide when and what specialists should review a given undertaking; 2) work with CRM advisors to provide Section 106 training to park staff; 3) initiate the identification of projects as undertakings, coordinate review of potential undertakings to allow sufficient time for Section 106 compliance to be completed in a timely manner and ensure involvement of appropriate cultural resource management specialists, interested persons and the public as appropriate; 4) decide whether an undertaking is a programmatic exclusion and document this for the Superintendent's approval; 5) log and track Section 106 activities and documentation and maintain park files on Section 106 documentation including all "Assessment of Effect" forms; 6) maintain close coordination with the SHPO in executing provisions of this agreement; and 7) submit appropriate Section 106 documentation to the SHPO and Council as required in 36 CFR Part 800 for all undertakings (except programmatic exclusions stipulated above and those in the Nationwide Programmatic Agreement).

B. **Park /SHPO:** In an effort to expand and facilitate cooperation, coordination, and communication between NPS and the SHPO, it is mutually agreed to meet annually to discuss the compliance process, receive briefings on the status of various ongoing or pending projects, review the list of subject matter specialists sitting on the park 106/NEPA Review Committee, and discuss projects and activities that may require notification/consultation with the Council.

C. **Park/SHPO/Council:** Council may monitor activities carried out pursuant to this Agreement, and Council will review such activities upon request. Upon request, the park Superintendent will be considered an "interested party" under 36 CFR Part 800 for purposes of undertakings by other Federal and state agencies and Indian tribes that may affect the park, including planned state or federal undertaking in areas in and around parks, in conformance with the "Programmatic Agreement Between the National Park

Service and the Pennsylvania State Historic Preservation Officer Regarding the Implementation of Federal Consistency Under Public Law 101-377" dated July 21, 1994.

- D. Native American Consultation/Discovery of Human Remains:** NPS will adhere to relevant provisions of the Native American Graves Protection and Repatriation Act (P.L. 101-601) and will follow consultation/implementation guidelines established in "Appendix R: NAGPRA Compliance" of *Director's Order #28* (dated 11 June 1998).
- E. Public Participation:** Through such other means as NPS may consider appropriate, the park will notify the public of undertakings subject to SHPO and/or SHPO/Council review. For such projects, NPS will make available to the public any documentation about such projects or programs, including information on the identification and evaluation of cultural resources and the proposed treatments of these resources. Council and/or SHPO may elect to participate in consultation for highly controversial projects.

VII. RELATIONSHIP TO OTHER EXISTING AGREEMENTS:

- A.** Except as stipulated above, nothing in this agreement supercedes provisions of the Nationwide Programmatic Agreement (as amended) or any other implementation agreement between Council, the SHPO, or the NPS. Signature and implementation of this Agreement does not invalidate park-specific Memoranda of Agreement negotiated for Section 106 purposes prior to the effective date of this agreement.

VIII. POST REVIEW DISCOVERIES:

- A. In General:** In the event that a previously unidentified archeological resource is discovered during ground disturbing activities, NPS shall immediately notify SHPO. All construction work involving subsurface disturbance will be halted in the area of the resource and in the surrounding area where further subsurface remains can be reasonably expected to occur. The NPS and the SHPO, or an archeologist approved by both agencies, immediately will inspect the work site and determine the area and nature of the affected archeological property. Construction work may then continue in the project areas outside the site area. Within two (2) working days of the original notification of discovery, NPS, in consultation with the SHPO, will determine the National Register eligibility of the resource. If the resource is determined to meet the National Register criteria (36 CFR Part 60.6), the NPS will ensure compliance with Section 800.13 of Council regulations. Work in the affected area shall not proceed until either (a) the development or implementation of appropriate data recovery or other recommended mitigation procedures, or (b) the determination is made that the located remains are not eligible for listing on the National Register. In addition, human remains and associated funerary objects encountered during the course of actions taken because of this agreement shall be treated in a manner consistent with the provisions set forth in the Native American Graves Protection and Repatriation Act.

IX. DISPUTE RESOLUTION:

- A. In General:** Parties to this Agreement agree to resolve disputes in strict conformance with provisions set forth in Section XI (Dispute Resolution) of the Nationwide Programmatic Agreement.

X. MONITORING, DURATION, TERMINATION, AND EXPIRATION:

- A. In General:** At any time, parties to this Agreement may determine whether revisions or amendments to this Agreement are needed. If parties to this Agreement determine that revisions or amendments are needed, the parties will consult in accordance with 36 CFR Part 800.13 to consider such amendment, and upon the unanimous decision of all parties, such amendments will be implemented.
- B. Duration of the Programmatic Agreement:** This Programmatic Agreement will continue in full force and effect until ten (10) years after the date of the last signature. At any time in the six-month period prior to such date, the NPS may request the signatory parties to consider an extension or modification of this Programmatic Agreement. No extension or modification will be effective unless all parties to the Programmatic Agreement have agreed with it in writing.
- C. Failure to Carry Out Terms of this Agreement:** In the event that NPS does not carry out the terms of this Agreement, the National Park Service will comply with the terms of the Nationwide Programmatic Agreement, or 36 CFR Section 800.4 through 800.6 as applicable with regard to individual undertakings that otherwise would be covered by the terms and provisions of this Programmatic Agreement.
- D. Termination:** Termination of this agreement will follow the procedures laid out in Section XII (B) of Nationwide Programmatic Agreement.
- E. Execution and Implementation:** Execution and implementation of this Programmatic Agreement evidences that the park has satisfied its Section 106 responsibilities for all individual undertakings of the program.

PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICER

By: Jan H. Cutler Date: June 28, 2007

NATIONAL PARK SERVICE, Valley Forge National Historical Park

By: Michael A. Caldwell Date: JUN 27 2007

Incorporated by Reference:
Nationwide Programmatic Agreement
36 CFR Part 800—Protection of Historic Properties