



Finding of No Significant Impact New Lands Development Concept Plan / Environmental Assessment

Recommended

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Date

Approved

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Date

Introduction

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] 4321 et seq.); the Department of the Interior NEPA regulations (43 CFR Part 46);¹ and the National Park Service (NPS) Director’s Order 12: *Conservation Planning, Environmental Impact Analysis and Decision-making* and its accompanying NPS NEPA Handbook, the NPS prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with a new lands development concept plan at Shiloh National Military Park (the park) in and around Corinth, Mississippi, and at the Davis Bridge and Fallen Timbers battlefield sites in Tennessee. The National Park Service has concluded that this action will not have a significant effect on the human environment, as documented in this Finding of No Significant Impact (FONSI).

The park was established in 1894 to preserve the scene of the first major battle in the Western Theater of the Civil War. Until 2000, the park contained about 3,900 acres of the Shiloh Battlefield and the Shiloh National Cemetery in southwestern Tennessee and the land around Battery Robinett in Corinth, Mississippi. The Corinth Battlefield Preservation Act of 2000 (Public Law 106-271, 16 United States Code [USC] 430f-6) significantly expanded the park’s boundary by creating the Corinth Battlefield Unit of the park. The boundary was again expanded through Public Law 110–161 121 Stat. 2122 on December 26, 2007, and again through the John D. Dingell, Jr. Conservation, Management, and Recreation Act (the Dingell Act) of 2019, bringing the total authorized acreage of Shiloh National Military Park to approximately 9,743 acres. For the purposes of this FONSI, “new lands” refers to all park property beyond the Shiloh Battlefield. “Subunit(s)” refers to each distinct area (i.e., Battery Robinett or Contraband Camp) that makes up the three management units of the park. Individual subunits may be composed of multiple legal real estate parcels, not all of which are currently federally owned.

The New Lands Development Concept Plan / Environmental Assessment (the plan/EA) has been prepared to guide restoration of the new lands and direct the interpretive planning and development for visitor access at the distinct subunits. The purpose of the plan is to provide long-term guidance for public access and preservation of recently added siege and battle sites. The plan outlines an approach for landscape restoration and development of visitor infrastructure at battlefield sites; it integrates natural and cultural resource protection goals of the park and assesses impacts related to visitor experience. This plan addresses a range of issues and opportunities associated with new lands that include:

- identifying potential impacts on the battle sites’ cultural and natural resources from public visitation that could occur as the result of implementing this plan, and developing mitigation strategies to ensure these resources are preserved for future generations;
- identifying and prioritizing necessary infrastructure improvements to support visitor use and NPS operations within the sites;
- enhancing visitor understanding of the history and significance of the new lands and their connection to surviving historic resources;

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

- providing a cohesive visitor experience throughout the park’s subunits and projecting a clear NPS identity; and
- maintaining productive, positive relationships with stakeholders and partners through proactive communication, engagement, and shared goals.

Public Involvement

Members of the public were provided with several opportunities to comment during the planning process. The park hosted open house civic engagement meetings at the Corinth Civil War Interpretive Center on June 11 and 12 of 2024 to inform the public about the plan and receive feedback on its purpose and goals. On a set of Flipchart pads, attendees were encouraged to write their thoughts about the general plan and the specific proposals for individual subunits. These responses were recorded, digitized, and analyzed for consideration during subsequent draft plan revisions. Approximately 50 people attended the meetings. The park also opened the draft management concepts to public review and comment between May 20 and July 4, 2024, through standard mail and the project’s NPS Planning, Environment and Public Comment (PEPC) website. Reviewers were prompted with five topic questions, and responses were recorded and analyzed for consideration during subsequent plan revisions and the development of this environmental assessment. Twenty-seven individuals submitted correspondence through PEPC. Finally, the park opened the draft plan and EA to public review and comment from April 28 to May 28, 2025, through standard mail and the project’s PEPC website. Four individuals submitted correspondence through PEPC. The minor modifications made to the EA in response to public comments are provided in attachment B.

The statements and conclusions reached in this FONSI are based on the documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below. As required by NPS *Management Policies 2006*, a finding of non-impairment is included in attachment C. All page numbers and section/sentence locations referenced in this FONSI pertain to the plan/EA published for public review in April 2025.

Selected Action and Rationale for the Decision

Based on the analysis presented in the EA, the NPS selected alternative 2 (proposed action and NPS preferred alternative) for implementation. The selected action is summarized below and described in detail in the plan/EA starting on page 23.

Across all new lands, the park will implement or improve NPS identity and wayfinding, trails and pedestrian routes, partnerships, and resource protection strategies. Consistent visitor use infrastructure and NPS branding features will be installed across all new lands, such as orientation and interpretation kiosks, self-guided tour features, worm fencing, and signage both in and outside the park. Trails will be developed or improved at each subunit to the extent feasible given topography and resource constraints, including new and modified pedestrian routes that will meet Architectural Barriers Act Accessibility Standards (ABBAS) to the maximum extent practicable. The park will continue to prioritize and, as appropriate, formalize key partnerships to preserve and interpret the park while enhancing the interpretation of the Civil War landscape outside the park. Monitoring strategies will be developed and implemented to maintain desired conditions and to detect and mitigate adverse impacts to resources.

Subunit-specific actions will also be implemented. For example, at Battery Robinett, the park will work with the city to improve visitor safety and access to historic views, including the removal of a non-historic street section. The park will remove or repurpose disused structures and improve historic views through restoration of historic vegetation patterns and/or using vegetation to screen visual intrusions. The park

will reconfigure or construct parking areas to improve staff and visitor access to the site. Regimental markers and interpretive waysides will be installed as appropriate. The selected action will make the Davis Bridge subunit more accessible and understandable to visitors. There, three modern homes will be demolished, one lot converted into a parking area and the other lot restored with vegetation. Two existing parking lots on the east side of the river will be improved and connected by new or existing trails. The historic road trace will be adapted into a pedestrian trail. The west side of the river will feature a new parking area with orientation features, and a trail system built mostly on previously disturbed corridors. Regimental markers will be added throughout the subunit as appropriate. Actions at the other subunits are similar: establishing new parking areas or improving existing ones within their current footprints; installing or replacing gates as needed; establishing or relocating NPS branding signs and orientation features; establishing benches and shade trees; and establishing new pedestrian trails and loops. Where possible, historic views will be improved by removing visual intrusions and thinning or allowing growth of vegetation, in both cases improving historic views across battlefield landscapes. For the 1862 Federal Siege Lines 5/28 subunit, the park will work with partners to reduce the speed limit on the public road adjacent to the site to improve safety for visitors turning into the parking area. Removal of legacy infrastructure will improve the protection and character of historic landscapes including earthworks, and new infrastructure will be sited to improve interpretation and avoid harm.

Rationale for the Decision

The selected action was selected because it best meets the purpose and need for the project. It will provide a consistent NPS presence and visitor experience across the new lands of the park. Visitors will continue to access park areas via private automobile or tour buses and, upon arrival, will encounter safe and accessible parking. At area entrances (parking lots), visitors will encounter interpretive media clearly identifying the area as a national park and a component of Shiloh National Military Park; such media will also provide information about the resources in the unit and their relationship to the Battle of Shiloh, the siege, battle, and occupation of Corinth, and the wider Civil War history. Visitors will be able to reach and experience the significant historic features of each site via a minimal but accessible trail network that, at some sites, will also provide rustic recreational pedestrian hiking opportunities. Over time, some park areas will be restored to vegetation schemes better fit for the park's period of significance through use of manual thinning and prescribed fire (as recommended in the park's cultural landscape report and under the guidance of a fire management plan). Across all new lands (when historic data allow), the park will continue its mandate for marking regimental positions and battle locations with media approximating the style and design of the regimental markers at the Shiloh Battlefield Unit. In areas of the park where the National Park Service has already established visitor services (the Battery Robinett and Contraband Camp subunits of the Corinth Battlefield Unit), similar improvements will also be made.

Resource Protection Measures

The National Park Service will implement mitigation measures to protect the natural and cultural resources that implementation of the plan could affect. These measures and practices are described in detail in the plan/EA on pages 45-46 and are hereby incorporated by reference. They will be implemented as part of the selected alternative. Additional mitigation measures were not needed to reduce environmental impacts below the significance threshold, as defined by the NPS NEPA Handbook.

Other Alternatives Considered

In addition to the selected action, the EA analyzed the no-action alternative which is briefly described in this section.

No-action Alternative

The no-action alternative, described on pages 22-23 of the plan/EA, would not change the current management direction or level of management intensity. Under the no-action alternative, the park would continue to operate and maintain the existing facilities in their existing conditions, configurations, and locations. Natural and cultural resources would continue to be managed according to general NPS policy as park staffing and funding levels allow. The no-action alternative was not selected for implementation because it is inconsistent with NPS policies and regulations related to visitor use and resource protection. Maintaining management at current levels would leave the park offering little in terms of trails or access to historic properties important to understanding the Siege and Battle of Corinth. In units and subunits of the park where some level of access currently exists, accessibility challenges would persist, limited or nonexistent parking would remain, little NPS identity would be displayed, and signage explaining to visitors the connectivity of the sites would be absent. In some cases, visitors will not be able to access a subunit at all, and in others, such as at Battery F, visitors may not realize they are at a national park.

Significance Criteria Review

Potentially Affected Environment

The project area for this plan consists of seven noncontiguous subunits of the Corinth Battlefield Unit, the Fallen Timbers subunit of the Shiloh Battlefield Unit, and the Davis Bridge Battlefield Unit. The physical character, vegetation, conditions of cultural resources, and ease of access vary across these areas. The potentially affected environment is summarized below and described in the plan/EA starting on page 47.

Common to All Subunits

Soils in the park are not dry or frozen for long periods since typical weather is humid and subtropical, consisting of hot, humid summers and mild winters. Therefore, the processes of soil formation are active throughout the year. Soils across the subunits have been impacted by the construction of roads and facilities, leading to compaction, alteration of natural drainage patterns, and increased runoff, which collectively contribute to erosion and sedimentation in surrounding areas. High potential exists for future impacts on park soils associated with temperature and precipitation trends. Increasing temperatures will cause an increase in evaporation, particularly during the summer, potentially leading to decreased soil moisture and loss of productivity. Additionally, the projected increase in heavy rain events may contribute to increased soil erosion rates.

Bats are critical components of surface and subsurface ecosystems. Bats play a critical role in controlling nocturnal insects and serve as a major asset to pest management in agricultural and forest settings. Bat species that occur in the park are exclusively insectivores, and their consumption of insects is of great benefit to surface ecosystems. Of the 21 federally protected species, the Indiana bat (endangered), northern long-eared bat (endangered), and tricolored bat (proposed endangered) were considered for analysis because of the strong potential for the species to inhabit the planning area. Details of these species are described starting on page 67 of the plan/EA.

Battery Robinett

The Battery Robinett subunit includes the modern Corinth Civil War Interpretive Center and is the primary visitor engagement and orientation locus among the new lands in and around Corinth. The subunit is characterized by maintained lawns and scattered trees in the east and woodlands and irregular fields in the west. The interpretive center is not clearly signed although there is an NPS sign at the turnoff

road, where visitors park in a paved lot and walk up a ramp to the building which features several rooms with interpretive panels and exhibits, and seasonal ranger-led programs. Immediately outside the building is a re-creation of a Civil War artillery battery, from which visitors proceed to the crest of the hill (where there is no trail) to observe memorial markers and a monument for fallen Confederate and Federal soldiers. Remote sensing has revealed potential burials in this area. The hillcrest is where Union artillery was arrayed during the battle. It provides a sweeping view of the historic core of Corinth below and to the east, but the remains of the battery's earthworks have eroded and are no longer visible aboveground. Modern structures intrude on the historic views within and outside the park. There are no interpretive waysides, so it's not clear to visitors where the battery was located historically.

Battery F

This small subunit is embedded in a residential neighborhood and features a small wooded hill topped by a set of earthworks, which have been impacted by erosion and social trailing. Views to and from the earthworks are obscured by vegetation. The rest of the subunit is a relatively flat, mown field that presents a "city park" appearance, with little indication of NPS management. There are two interpretive waysides in the field, but otherwise no trails or other visitor use infrastructure.

Confederate Siegeworks

The subunit is forested with a high hill at its northern end, a creek, and an artificial pond roughly in its center. Visitor opportunities include bicycling, running, and walking pets, among other activities. The entrance road is gated and closed to vehicle traffic, and visitors enter via an unimproved gravel parking lot from which they can proceed approximately one mile to an unimproved trail that leads up a hill to a series of well-preserved earthworks with adjacent viewing platforms. The historic landscape is characterized by its hilly terrain, the extant artillery redoubts, and a covered way. Below-grade archeological resources are likely present. Currently, the loop road, trail, and viewing platforms represent the extent of visitor opportunities.

1862 Federal Siege Lines 5/17

This small, forested subunit is not currently accessible to the public. It has no designated trails or other visitor opportunities. The historic landscape is characterized by earthworks sited along the crest of a hill. Below-grade archeological resources are likely present. An existing road adversely impacts the historic landscape since it disrupts the spatial organization of the earthworks, and the historic viewshed is obscured by heavy forest cover.

1862 Federal Siege Lines 5/19

This subunit is characterized by young oak-hickory forest and dense successional forest growing over former agricultural fields. Visitors access it via a short, paved road off the state highway that leads to an NPS entrance sign and gate. From the gate, visitors walk along a gravel road with a line of impressive earthworks running parallel to it. The location of the road on the west side of the earthworks hinders a historical experience since the Union soldiers would have been facing west. The historic landscape is characterized by the earthworks, strategically arrayed to take advantage of topography. They are in remarkably good condition, although existing roads encroach upon, cut through, or run over them. Historic views from the earthworks to the open countryside are compromised by thickening successional forest.

1862 Federal Siege Lines 5/28

Visitors access this subunit on foot from a road managed by the Mississippi Department of Transportation. There is no designated parking area, but there is an NPS sign and orientation kiosk. Vegetation includes sections of oak-hickory and lowland forests, pines, hayfields, and unmown grasses. An existing trail system begins at the access road and makes a figure eight, with a half mile-long Civil War trail running past earthworks in the north, and a mile-long nature trail to the southeast that is maintained by the Audubon Society. The historic landscape is characterized by earthworks spatially organized to take advantage of topography. Open views to the west from the earthworks are compromised by dense forest and have lost their historic character, but views of hayfields and abandoned fields are historical. The state highway that runs in proximity to the earthworks is a busy road that intrudes upon the historic viewshed and soundscape.

Fallen Timbers

Visitors access the subunit via a small gravel parking lot. It is characterized by oak and pine forests in the west and areas of oak forest and agricultural fields in the east. Historical landscape features include road traces, topography, views, and certain natural features, although existing vegetation patterns are non-historical. Aside from the road traces—including Ridge Road, which is in poor condition—there are no surviving above-ground historical resources. A single interpretive wayside and a walk along Ridge Road represent the extent of available visitor experiences.

Corinth Contraband Camp

Visitors access this subunit via North Parkway Street through a large, double, inward-swinging gate that leads to a paved parking area where there are benches and a sign providing orientation information. From the parking lot, visitors can walk a paved, ABAAS-compliant pedestrian loop through a park-like setting that features life-size bronze statues depicting African Americans engaging in different aspects of camp life. The interpretive loop and parking area in the subunit's southwest corner represent the extent of its visitor opportunities. The rest of the subunit is undeveloped and characterized by an oak-hickory or lowland forest, a lake in the west, and a creek in the east. The historic landscape lacks integrity since no historic resources survive above-grade except for two low earthwork remnants which lack historical context.

Davis Bridge

Key topographic features of the historic landscape are the steep-banked Hatchie River and the heights to its west and east. Woodlands to the west give way to open fields that rise to Metamora Hill, where a Union artillery position was located. Dominating the eastern half of the subunit are highlands covered in dense pine forest (nevertheless heavily impacted by logging) where significant fighting took place. Davis Bridge itself is no longer extant. Pocahontas Road, Wolf Pen Road, and the road trace of Old State Line Road contribute to the character of the historic landscape, as do views from Metamora Hill, although there are modern visual intrusions here such as homes. Visitors access this subunit via roadside parking west of the river, where a small, informal entrance area with an NPS sign and gate allows foot access to a trail following the Old State Line Road trace. This trail leads past a memorial area (not dating to the Civil War period) to the river, where there is an interpretive wayside. Elsewhere in the unit is a parking lot atop Metamora Hill, although there are no accessible visitor opportunities beyond an interpretive wayside and views of the battlefield. The trace of Old State Line Road in the vicinity of the hill is not marked and difficult to identify. There is no visitor access or support infrastructure east of the Hatchie River.

Degree of Effects of the Action

The National Park Service considered the following actual or potential project effects in evaluating the degree of the effects for the selected action.

Beneficial and Adverse, Short-term, and Long-term Effects of the Proposed Action

The National Park Service did not identify any significant impacts to resources that would require analysis in an environmental impact statement. The impacts of the selected action, including direct, indirect, short-term, and long-term effects, do not reach the level of a significant effect. Implementation of the preferred alternative will result in both beneficial and adverse impacts, as described below.

Visitor Use and Experience. Implementation of the selected alternative will result in long-term, beneficial impacts to visitor use and experience by increasing access to new lands, improving wayfinding and orientation, and expanding opportunities for interpretation and education across subunits. New parking areas, trails, and interpretive infrastructure such as kiosks and waysides will provide access to subunits that were previously inaccessible and enhance the quality of experience in subunits with existing infrastructure. The use of ABAAS-compliant pedestrian routes, enhanced signage, and coordinated public information efforts will broaden the range of visitor experiences and improve accessibility. These actions will contribute to a consistent and high-quality visitor experience throughout the new lands. Short-term, adverse impacts will occur during construction due to noise, visual disturbance, and temporary closures of certain areas; however, these impacts will be intermittent, localized, and mitigated through visitor communication and scheduling. Some long-term, adverse impacts may occur for visitors who prefer less developed or more rugged landscapes, particularly where paved routes or physical barriers are introduced to protect resources. Overall, the selected alternative will result in both short-term, minor adverse impacts and long-term, beneficial impacts on visitor use and experience. The impacts will not be significant because the actions improve access and experience opportunities without fundamentally altering the character of the new lands or impairing the ability of visitors to connect with its cultural and natural resources.

Soils. While the construction of routes and parking lots and the thinning of vegetation will permanently disturb up to 5 acres of soil, rehabilitating existing parking lots, roads, and waysides will benefit approximately 21 acres of soil. Overall, the impact on soils will account for a small portion of the subunits: 5 acres of permanent impacts compared to the 2,483 total acres of the subunits, or less than 1%. Mitigation measures listed in Chapter 2 and the sustainable trail guidelines in Appendix C of the plan/EA will be implemented to reduce adverse impacts on soil from these actions. Therefore, the actions proposed under the action alternative are not expected to impact the long-term viability of soils in the park. The selected alternative will have long-term, adverse impacts on soils, but the impacts will not be significant because the actions will only affect less than 1% of all soils across the subunits.

Vegetation. The construction of routes and parking lots and the thinning of forest and land cover will result in direct, short- and long-term adverse impacts on vegetation. However, while the selected alternative will result in permanent vegetation removal of approximately 5 acres, it will also benefit approximately 21 acres. These beneficial impacts include rehabilitating existing parking lots, roads, and waysides, as well as restoring areas to their natural conditions. Overall, the removal of vegetation will account for the small percentage of less than 1% total impact on vegetation across the subunits. Additionally, vegetation thinning via tree thinning and possibly prescribed fire will have long-term, beneficial impacts on vegetation by reducing invasive plant species and enhancing the diversity, structure, and composition of the vegetation community. Mitigation measures in Chapter 2 and the sustainable trail

guidelines in Appendix C of the plan/EA will ensure that areas are surveyed prior to ground disturbance to ensure that final trail alignment avoids areas with high-quality vegetation, highly diverse vegetation, and healthy trees. The selected alternative will have long-term, adverse impacts on vegetation, but the impacts will not be significant because the actions will only affect less than 1% of all vegetation across the subunits and species composition in the project area will not change.

Special Status Bats. The construction of routes and parking lots and the thinning of vegetation will degrade summer habitats for the Indiana bat, northern long-eared bat, and tricolored bat. Specifically, the removal of trees will result in a loss or reduced quality of summer habitat conditions. However, mitigation measures in Chapter 2 will ensure that removal of known roost trees or any tree within 150 feet of a known roost tree will not occur. Additionally, trees within 0.5 miles of a known hibernaculum will not occur and tree removal will only occur outside the summer active period. The selected alternative will have adverse impacts on special status bats, but these impacts will be minor in the short-term and insignificant in the long-term. The impacts will not be significant because construction will be scheduled to occur when bats are hibernating and outside of the fall swarming, spring emergence, and summer maternity period. Park managers will do their best to avoid human disturbance to the special status bat species and the removal of any possible habitat for these animals.

Cultural Landscapes. The selected alternative will add new, compatible visual intrusions to historic landscapes across the new lands subunits, but also will remove or screen existing visual intrusions and restore historic vegetation patterns and views. None of the proposals will compromise the character-defining features of historic landscapes. The preferred alternative will be generally beneficial to cultural landscapes because it will bring these landscapes closer to their historic appearance.

Archeological Resources. The selected alternative is expected to cause some adverse impacts on archeological resources. While major, above-grade archeological features such as earthworks and road traces will not experience adverse impacts, ground disturbance could potentially impact currently unknown surface artifacts or subsurface deposits. Archeological surveys of proposed ground disturbance footprints for undertakings tiering from this plan will identify potentially affected archeological resources. The park will conduct consultation per 36 CFR 800 or apply the Nationwide National Park Service Programmatic Agreement, as determined by the agency official, for each undertaking tiering from this plan in order to avoid, minimize, or mitigate disturbance to in situ archeological resources.

Other Considerations for Effects of the Action

In evaluating the effects of the selected action, the NPS considered several other factors that might contribute to the intensity of impacts. The selected action will not affect public health or safety, is not expected to be highly controversial, and does not establish new precedents for future actions. The selected action does not violate any federal, state, or local law imposed for the protection of the environment.

Agency Consultation

The National Park Service submitted copies of the plan/EA to the Mississippi and Tennessee State Historic Preservation Officers on April 28 and 29, 2025, respectively, via their online submission portals. In the accompanying letters, the National Park Service stated that the proposed actions are consistent with the general treatment guidance in the recent cultural landscape report, which recommended a rehabilitation treatment approach for new lands. Rehabilitation allows compatible additions to, and alterations of, the landscapes to provide facilities for visitor access and use. The National Park Service provided examples of activity types from the plan and acknowledged that additional consultation in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, will be

required during the design/implementation phase for all projects tiering from the plan/EA. Both the Tennessee State Historic Preservation Office and the Mississippi State Historic Preservation Office concurred with the agency's approach to initiate Section 106 compliance on a project-by-project basis during the design/implementation phase of the plan/EA in accordance with the NPS Nationwide Programmatic Agreement (2008) or as outlined in the implementing regulations (36 CFR 800.1[c]).

Under the Endangered Species Act, the National Park Service does not anticipate that the long-term management vision articulated in the selected action will result in any adverse effects on threatened, endangered, and proposed listed species; designated critical habitats; candidate species; or migratory birds. The National Park Service made a *may affect, not likely to adversely affect* determination for the three special status bat species (Indiana bat, northern long-eared bat, and tricolored bat) that may occur in the study area. On April 28, 2025, the National Park Service sent a letter to the US Fish and Wildlife Service notifying them of this determination and committing to continued coordination with their office during future implementation of projects tiering from the plan. The US Fish and Wildlife Service responded on June 18, 2025, to concur with the NPS determination of effect, provided that continued coordination occur when future individual projects are funded and implemented.

Tribal Consultation

On April 28, 2025, the National Park Service provided a copy of the plan/EA to the following Tribes for government-to-government consultation: Alabama Coushatta Tribe of Texas, Alabama Quassarte Tribal Town, Cherokee Nation, Chickasaw Nation, Coushatta Tribe of Louisiana, Eastern Band of Cherokee Indians, Eastern Shawnee Tribe of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, Muscogee Creek Nation, Shawnee Tribe, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians in Oklahoma. In the accompanying letters, the National Park Service stated that the proposed actions are consistent with the general treatment guidance in the recent cultural landscape report, which recommended a rehabilitation treatment approach for new lands. Rehabilitation allows compatible additions to, and alterations of, the landscapes to provide facilities for visitor access and use. The National Park Service provided examples of activity types from the plan and acknowledged that additional consultation in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, will be required during the design/implementation phase for all projects tiering off of the plan/EA. On June 10, 2025, the Shawnee Tribe responded to concur with the agency's approach. No other responses from Tribes were received. The National Park Service will initiate Section 106 consultation with Tribal Nations on a project-by-project basis during the design/implementation phase of this plan in accordance with the implementing regulations (36 CFR 800.1[c]).

Conclusion - Finding of No Significant Impact

The selected action will not have a significant effect on the human environment in accordance with section 102(2)(c) of NEPA. This finding is based on consideration of the Council on Environmental Quality and NPS guidance on the criteria for significance, regarding the potentially affected environment and degrees of effects of the impacts described in the EA (which is hereby incorporated by reference) and as summarized above.

Documents appended to the FONSI include the following:

- Attachment A: Response to Public Comments
- Attachment B: Errata Indicating Text Changes to the Environmental Assessment

- Attachment C: Determination of Non-Impairment

Attachment A: Response to Public Comments

The plan/EA was available for public review and comment between April 28 and May 28, 2025, through standard mail or the project's PEPC website. The NPS received four pieces of correspondence during the public review period. All comments were read and analyzed to identify substantive comments. Section 4.6 of the NPS NEPA Handbook defines a substantive comment as a comment that does one or more of the following:

- Question, with reasonable basis, the accuracy of information in the NEPA document
- Question, with reasonable basis, the adequacy of the environmental analysis
- Present reasonable alternatives other than those presented in the NEPA document
- Cause changes or revisions in the proposal

In other words, substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal response.

The following text summarizes the substantive comments received during the comment period and is organized into concern statements and responses. All page numbers contained herein refer to the version of the plan/EA that was released for public review.

Visitor Use Infrastructure

1. **Concern Statement:** Two respondents stated that restroom facilities are needed but are not mentioned in the plan.

Agency Response: Establishment and upkeep of restrooms in the SHIL new lands are unfortunately not economically feasible at this time. The park has noted this comment and will reevaluate the need and feasibility of adding restrooms in the future.

2. **Concern Statement:** A respondent suggested that the plan/EA include a more detailed analysis of how visitor flow patterns, transportation modes, and recreational use are likely to shift with the proposed changes. For example, modeling expected pedestrian and bus traffic to the Contraband Camp or predicting changes in visitor time on site after trail improvements would help quantify potential benefits—and build the case for further investment in Corinth-based infrastructure.

Agency Response: The NPS does not have the data required to conduct this analysis, and it is not clear that gathering this sort of data would be sufficiently predictive to serve as a basis for accepting or rejecting the proposals that are within the scope of this plan. Upon plan implementation, the park will look for opportunities to use monitoring data to inform future proposals for investment in Corinth-based infrastructure.

Resource Management

3. **Concern Statement:** A respondent was concerned at the lack of archeological survey coverage throughout the park new lands and the lack of a qualified professional archeologist on staff, stating that the lack of archeological expertise raises concerns about resource protection and would result in a delay in the implementation of the plan/EA.

Agency Response: The park relies on regional support for archeological expertise and will request funding or direct support for archeological surveys as deemed necessary. Limited archeological surveys along potential disturbance footprints will occur during plan implementation. No delays are anticipated.

Interpretive and Programming Opportunities

- Concern Statement:** The park's public event calendar is under-utilized. The park has much to offer but limits itself to canon firings and limited tour dates and times. Additional programs both inside and outside the visitor center are needed to encourage and engage visitors, for example: picnics in the park, concerts, movies on the lawn, and historical reenactments. There are thousands of public-school children who have never been to Shiloh. It should be available, encouraged, and accessible for social engagement and education.

Agency Response: The level of detail called for by this comment is beyond the scope of a DCP and would be more appropriately addressed in a long-range interpretive plan or similar planning process. Nothing in the plan/EA precludes expansion of park interpretive and programming opportunities, nor the specific examples suggested by the respondent. The park will take this into consideration.

- Concern Statement:** A respondent recommended maintaining a consistent NPS presence at Battery Robinett year-round and supporting periodic programming at other sites. This would include educational programs, school partnerships, and seasonal events that could increase dwell time and economic benefit to the city, while deepening public engagement with the landscape.

Agency Response: The plan/EA already contains these provisions.

- Concern Statement:** A respondent encouraged the NPS to explore sustained educational partnerships with schools and youth organizations in Corinth and the tristate area. Examples included ranger-for-a-day initiatives, summer internships, or field experiences tied to Mississippi social studies standards. This would help local students form meaningful connections to the park and see themselves as part of its long-term story.

Agency Response: These suggestions are outside the scope of the plan/EA but are not precluded by it. The park will take this into consideration.

- Concern Statement:** A respondent supported the development of an annual commemorative event in Corinth such as a Civil War Heritage Weekend or a Contraband Camp Emancipation Day, which could provide a consistent opportunity for community gathering, public education, and regional tourism. This kind of event could position Corinth as not just a site of historical memory, but of continued public engagement.

Agency Response: These suggestions are outside the scope of the plan/EA but are not precluded by it. The park will take this into consideration.

NPS Identity and Wayfinding

- Concern Statement:** A respondent suggested that the Corinth battlefield is invisible to many travelers passing through the area on US 45 and US 72, despite its historical significance, and urged NPS to coordinate with the Mississippi Department of Transportation and the City of Corinth to install prominent and branded signage for Shiloh National Military Park along the highways, especially for Battery Robinett and the Contraband Camp. Interpretive markers could also help tell the broader narrative of the region's significance in Civil War history.

Agency Response: The plan/EA already suggests wayfinding improvements but not at this level of detail. Language in the parkwide actions for the proposed alternatives discusses signage in proximity to the subunits but not along major highways, although the concept is consistent with the plan. In response to this comment, explicit language will be added about partnering to add signage along major highways (see Appendix B).

Community Connections

9. **Concern Statement:** A respondent observed that the newly acquired parcels along W. Linden Street extending toward Marsea Street are a highly visible but underutilized space and encouraged the NPS to use this land constructively. The parcels might be used as an expanded greenspace with interpretive features; as a space for support infrastructure such as shaded rest areas, native gardens, or limited parking; or as a connection point within a larger trail loop. The area could serve as a welcoming corridor that invites foot traffic from downtown Corinth, helping bridge the community with its national park.

Agency Response: The park is generally supportive of this concept and has already worked with the city to construct a sidewalk connector south of Linden Street. However, it must be noted that there should be some limits on beautification efforts in this particular area since during the battle it was a killing field of fallen trees. The park will continue to balance visitor use and community engagement values with resource preservation values that each subunit finds appropriate in light of the historical events that transpired at these sites.

10. **Concern Statement:** A respondent stated that the plan's emphasis on vegetation restoration, cultural landscape preservation, and protection of sensitive habitats (e.g., for special-status bat species) is well supported and important. What could be strengthened is the plan's engagement with how environmental design—such as signage, native plantings, and trail alignment—can simultaneously serve ecological, aesthetic, and community recreation goals. The respondent particularly encouraged expanding the scope of vegetation restoration to include native plant landscaping in visible entry areas (such as along Linden Street), where scenic integrity can enhance both interpretation and civic pride.

Agency Response: The proposals in the plan/EA broadly address ecological and recreational values, but do not explicitly focus on aesthetics. In response to this review comment, a sentence has been added to the parkwide desired conditions which acknowledges aesthetic values alongside ecological and historic preservation values for planting native vegetation (see Appendix B).

11. **Concern Statement:** A respondent strongly recommended that the NPS collaborate with the City of Corinth and the Mississippi Department of Transportation to formalize and maintain a bicycle- and pedestrian-accessible trail network between the subunits. This effort could include upgrades to the existing greenway trail and the addition of interpretive signage along the route, and it could support sustainable tourism and offer an amenity for local residents, particularly those in historically underserved neighborhoods near the Contraband Camp.

Agency Response: Development of a trail network outside the park boundary is beyond the scope of this plan/EA, however, the park recognizes the value in supporting improved multimodal access to the new subunits as well as the inherent value of community engagement and outdoor recreation. In response to this comment, new language has been added to the plan about community engagement for enhanced access to the park (see Appendix B).

Attachment B: Errata including Text Changes to the Environmental Assessment

These errata represent corrections and minor revisions to the plan/EA for Shiloh National Military Park. Page numbers and section/sentence locations referenced in the errata refer to the version of the plan/EA released for public review in April 2025. The edits and corrections in the errata do not result in any substantial modification being incorporated into the selected action, and it has been determined that the revisions do not require additional environmental analysis. The errata, when combined with the EA, comprises the only amendments deemed necessary for completing compliance and documentation for the project.

Original text from the EA is included to provide context and to allow for comparison to the text changes. Additions to the text are underlined and deleted text is shown in ~~strikeout~~.

Natural Resources (under Parkwide Desired Conditions), page 18

2. Natural resources complement the historic settings of the park's landscapes, and native species dominate the landscape. In high visibility, highly trafficked visitor use areas, native vegetation plantings may also serve aesthetic purposes.

Partnerships (under NPS Proposed Action / Preferred Alternative), page 25

Under the preferred alternative, the park would continue to work with partners to preserve and interpret the park; it would also work with willing partners and landowners to establish interpretive guidelines and design standards (for waysides, wayfinding signage, and regimental markers) and interpretive standards and media for historic properties outside the park that contribute to the purpose and significance of the park and its history. In this manner, the park can extend public appreciation of the Civil War landscape in and around Corinth in a manner that fosters appreciation of the history and lasting impact of Battle of Shiloh and the Siege and Battle of Corinth to important lands and historic properties associated with the national park but not managed by the federal government. The park may also work beyond its boundaries with the city, community organizations, and other groups to improve access to, and connectivity between, the subunits for pedestrians and potentially other modes of use.

NPS Identity and Wayfinding (under NPS Proposed Action / Preferred Alternative), page 23

NPS boundary signs would be installed along the perimeter of each subunit's NPS land ownership boundary. The park would coordinate with state and city agencies to install NPS-branded signage for the subunits along major highways running through Corinth, for example US 45 and US 72. The park would promote and develop self-guided tours that encourage visitors to access park sites (as infrastructure to support their experience is developed) in a manner that allows appreciation of sites associated with the Battle of Shiloh and the Siege and Battle of Corinth in historical chronological order.

Attachment C: Determination of Non-Impairment

The Prohibition on Impairment of Park Resources and Values

NPS *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values: “While Congress has given the Service management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the 1916 Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them. The impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment.”

What is Impairment?

Sections 1.4.5 and 1.4.6 of *Management Policies 2006* provide an explanation of impairment.

Section 1.4.5 defines impairment as

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

Section 1.4.5 goes on to state that

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

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

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

Section 1.4.6 of *Management Policies 2006* identifies the park resources and values that are subject to the no-impairment standard:

The "park resources and values" that are subject to the no-impairment standard include:

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

Non-Impairment Determination for the Selected Action

This determination of non-impairment has been prepared for the NPS selected action described in the Finding of No Significant Impact (FONSI) for the New Lands Development Concept Plan / Environmental Assessment. For the selected action, a determination of non-impairment is typically made for each of the impact topics carried forward for detailed analysis in the EA. However, the impairment determination does not include a discussion of impacts on visitor experience because it is not considered a park resource or value subject to the non-impairment standard. Therefore, an impairment determination was only made for the following natural and cultural resources. Impacts on these resources will be reduced to the extent possible through resource protection measures. Unacceptable impacts were also considered but will not occur.

Soils. While the selected action will disturb soils in the project area through the construction of routes and parking lots, less than 1% of soils across the subunits will be permanently affected. Mitigation measures will be implemented to reduce adverse impacts on soil from these actions. Additionally, restoring areas to natural conditions and rehabilitating existing parking lots, roads, and waysides will benefit soils. Because the area of permanent impacts on soils under the selected action will be small relative to soils across the subunits, and impacts will be limited through mitigation measures and best management practices, no impairment of soils will occur.

Vegetation. Construction and operation of the route system and parking lots, as well as vegetation thinning activities under the selected action, will remove up to 5 acres of vegetation. However, the vegetation communities that will be affected make up a small percentage of the subunits (less than 1%), are not rare, and can be found in abundance in the project area. The rehabilitation of existing parking lots, roads, and waysides, and the restoration of areas to natural conditions will benefit vegetation, will therefore reduce ongoing impacts to vegetation. Route maintenance and ongoing route use is not expected to detract from the integrity of vegetation communities. In addition, mitigation measures will be implemented to protect plant species of concern and control invasive plants. Therefore, no impairment of vegetation will occur under the selected action.

Special Status Bats. The construction of routes and parking lots and the thinning of vegetation will degrade summer habitats for the Indiana bat, northern long-eared bat, and tricolored bat. However, mitigation measures will ensure that these activities occur outside of the summer active period and that no roost tree removal will occur. No long-term, population-level impacts are expected to any special status bats species; no federally listed species or critical habitat will be adversely affected; and any habitat changes are not expected to result in population-level impacts; therefore, the selected action will not result in the impairment of special status bats.

Cultural Landscapes. The historic landscapes comprising the new lands subunits were identified as fundamental resources and values (Shiloh Battlefield Landscape, Corinth Landscape, and Davis Bridge Site) in the park's 2016 Foundation Document. New visual intrusions across the new lands subunits are compatible with the historic landscapes, while some existing visual intrusions will be removed or screened and historic vegetation patterns and views will be actively restored over time. None of the proposed actions will compromise the character-defining features of historic landscapes and many of the proposed actions will be beneficial by bringing these landscapes closer to their historic appearance. Therefore, the selected action will not result in impairment of cultural landscapes.

Archeological Resources. Archeological Resources is one of the park's fundamental resources and values identified in the 2016 Foundation Document. Major, above-grade archeological features such as earthworks and road traces will not experience adverse impacts. Ground disturbance could potentially impact currently unknown surface artifacts or subsurface deposits. The park will conduct archeological survey of proposed ground disturbance footprints to identify in situ archeological resources and avoid, minimize, or mitigate impacts in consultation with the relevant SHPOs, Tribal Nations, and other stakeholders. Therefore, the selected action will not result in impairment of archeological resources.

As was documented in the EA, the selected action was found to have minimal or negligible impacts on other resources such as wetlands and threatened and endangered species beyond the three species of bat that were carried forward for analysis. See Issues and Impact Topics Considered but Dismissed in the EA for more information. The impacts to these resources are small and insignificant. The resources will remain available to be enjoyed by current and future generations. Therefore, they will not be impaired by implementation of the Selected Action.

Summary

The adverse effects and environmental impacts anticipated as a result of implementing the selected action will not harm the resources or values identified in the establishing legislation or proclamation of the park as necessary to conserve. The resources and values key to the natural and cultural integrity of the park, the enjoyment of the park, and the historical significance of the park will not be affected to a level that constitutes impairment of Shiloh National Military Park.