



FINDING OF NO SIGNIFICANT IMPACT AND DECISION DOCUMENT

White-Tailed Deer Management Plan Environmental Assessment

Flight 93 National Memorial Fort Necessity National Battlefield Friendship Hill National Historic Site

July 2026

INTRODUCTION

Over the past century, white-tailed deer (*Odocoileus virginianus*; hereafter deer) densities have increased dramatically in states along the eastern United States. Overbrowsing of vegetation by deer has reduced forest regeneration, preventing forests from replacing themselves over time within lands managed by the National Park Service (NPS) in the Northeast Region. The browsing pressure created by deer, in combination with other natural stressors, including invasive plants, pests, pathogens, and increased storm severity and frequency, has driven eastern forests to such a degraded condition that many are experiencing severe regeneration failure and are one disturbance away from loss of forest. This means that canopy trees may be lost over time, and areas that are currently forests could become invasive shrub thickets or become dominated by different (and often shorter) tree species that are unpalatable to deer. At that point, management action is difficult and costly as forests can take decades to recover. Deer overbrowsing also impacts the cultural landscapes within the parks by changing vegetation community composition, historic character, and memorial plantings.

The National Park Service has developed a White-Tailed Deer Management Plan (“Plan”) and Environmental Assessment (EA) for Flight 93 National Memorial (FLNI), Fort Necessity National Battlefield (FONE), and Friendship Hill National Historic Site (FRHI). These three sites are units within the National Parks of Western Pennsylvania (WEPA) group, each with its own unique purposes and key resources. This Plan establishes a deer management strategy for white-tailed deer that supports the preservation of these sites.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [U.S.C.] § 4332[2] [C]); the 2025 Department of the Interior NEPA regulations (43 C.F.R. Part 46); 516 Departmental Manual 1: U.S. Department of the Interior Handbook of National Environmental Policy Act Implementing Procedures; and NPS Director’s Order #12: Conservation Planning, Environmental Impact Analysis and

Decision-Making (NPS 2011) and the accompanying NEPA Handbook (NPS 2015). Compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and Section 7 of the Endangered Species Act was conducted concurrently with the NEPA process.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. Relevant sections of the EA are summarized and incorporated by reference below. The EA is available on the NPS Planning, Environment and Public Comment (PEPC) project site at: <https://parkplanning.nps.gov/wepa-deer>.

SELECTED ACTION AND RATIONALE FOR DECISION

Selected Action

The NPS analyzed two alternatives in detail in the EA, including the no-action alternative. Based on this analysis, NPS selected Alternative B, the Proposed Action, for implementation because it best meets the purpose of and needs for action and does not cause significant or unacceptable impacts on the sites' resources. The selected action, which includes culling the deer population to achieve target deer densities, is described in detail in Chapter 2 of the EA and is incorporated here by reference. The EA analyzed impacts from the alternatives based on what was known or could reasonably be assumed at the time of preparation.

The selected action includes continuation of the current activities described under the no-action alternative to document deer population density, monitor forest regeneration, and conduct surveillance of the deer population for Chronic Wasting Disease (CWD). In addition to continuing these activities, the selected action reduces the deer population at all the sites mentioned above by an annual culling of the deer to achieve a deer density of approximately 20 deer per square mile. The primary goal is promoting forest regeneration in support of natural ecosystems and cultural landscapes. The NPS will measure forest regeneration through ongoing monitoring of metrics such as the establishment of canopy tree seedlings, the average diameter at breast height of saplings and trees, live tree density, and the composition of saplings and seedlings in the forest understory.

Sharpshooting

The NPS will reduce deer populations through sharpshooting by trained firearms experts with experience in wildlife reduction operations. These operations will occur between dusk and dawn (when the park is closed), typically from November through March, with temporary bait stations used as needed to draw deer into safe shooting areas. Sharpshooters will employ high-powered, small-caliber rifles at close, controlled ranges to ensure predictable outcomes, use non-lead ammunition to prevent meat contamination, and utilize noise suppression devices to minimize disturbance to the public and other wildlife. These operations will comply with NPS firearm directives and applicable federal laws. To guide both initial and ongoing efforts, the NPS will prepare an annual deer management operations plan. This annual plan will specify culling locations, methods, annual population reduction goals, plans for CWD testing, meat donation or carcass and waste disposal, and safety measures such as timing, park closures, staffing requirements, and coordination with adjacent landowners. The NPS will notify the public in

advance of closures and activities through media releases, website and social media alerts, posted notices in visitor areas and nearby communities, and coordination with state wildlife agencies.

Number of Deer Culled

Under the selected action, the NPS will continue field surveys to estimate deer population density within park boundaries. The NPS will use these results to calculate a population index that closely correlates with deer density and provides sufficient information for adaptive management decisions, even though it will not yield an exact density estimate. During the first several years of Plan implementation, intensive sharpshooting will rapidly reduce deer numbers from the current 70-100 deer per square mile to levels equivalent to approximately 20 deer per square mile. Monitoring results, forest regeneration data, technical feasibility, and experience of other deer management programs will inform subsequent years' sharpshooting efforts. The NPS may adjust the target population index over time based on ongoing monitoring of vegetation and deer populations and will determine annually whether management actions are warranted. To accelerate population reduction and limit future fawn recruitment, initial culling will remove both female (does) and male (bucks) deer; however, the priority will be on female deer, as reducing reproductive females is the most effective means of long-term population control. Where feasible, the NPS will avoid shooting large bucks and schedule operations after the regular hunting season. This will allow hunters on adjacent properties the opportunity to harvest large bucks that range beyond park boundaries.

Deer Carcass Processing and Disposal

The NPS may donate suitable deer meat in accordance with applicable regulations and NPS guidelines. Potential recipients include local charitable organizations, nonprofit food banks, and zoos housing large predators. For deer harvested in areas affected by CWD, meat donation will follow current guidance from the NPS Office of Public Health, the Washington Office—Biological Resources Division, the NPS Manager's Reference Notebook to Understanding Chronic Wasting Disease (2012), input from NPS wildlife disease experts, and all state and local requirements. Deer carcasses will be securely stored until CWD testing is completed. Following CWD testing, suitable meat from deer testing negative for CWD will either be processed by experienced staff or be transported to an off-site processor. Entrails will generally be disposed of off-site. However, if an appropriate location is available away from visitor use areas and sensitive resources (such as archeological sites), staff may bury entrails on-site; in remote locations, they may leave entrails on the surface to decompose or be scavenged naturally. Staff will transport deer carcasses not suitable for consumption or surface disposal to an approved local landfill or other authorized disposal facility.

Monitoring

Under the selected action, the NPS will continue periodic monitoring to evaluate progress toward the Plan's purpose. This includes monitoring deer density using uncrewed aerial systems (UAS), wildlife cameras, or other appropriate methods, as well as vegetation monitoring. The NPS will use these data to set deer density targets and to document changes in forest regeneration resulting from reduced deer numbers. Resource managers anticipate that seedling abundance could take up to 5 years to respond to lower deer densities, with sapling recovery potentially taking up to 10

years; therefore, the NPS will continue sharpshooting efforts to maintain target deer density levels while allowing sufficient time for vegetation to recover. The pace and magnitude of the vegetation response will depend directly on how quickly the deer population is reduced. The NPS will adjust the number of deer removed in subsequent years based on the effectiveness of prior removal efforts, projected population size, observed vegetation response, and ongoing deer monitoring results.

MITIGATION MEASURES

The NPS emphasizes avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the NPS will implement mitigation measures and best management practices to protect visitor safety and other natural and cultural resources. These measures and practices are described in detail in the “Mitigation Measures and Best Management Practices” section of the EA and are hereby incorporated by reference. As stated in the EA, these mitigation measures and best management practices are included as integral parts of the selected action. The NPS has the authority to implement the mitigation measures under the Organic Act of 1916 (54 USC 100101 et seq), the Wilderness Act of 1964 (16 USC 1131 et seq), the National Historic Preservation Act of 1966, as amended (54 USC 300101 et seq), the Endangered Species Act, as amended (16 USC 1531 et seq), NPS *Management Policies 2006*, and other federal and state applicable requirements.

SIGNIFICANCE CRITERIA REVIEW

Potentially Affected Environment

The sites are in the Appalachian Plateau of western Pennsylvania, just north of the Maryland and West Virginia borders, in a region defined by rolling hills, extensive forests, and diverse wildlife habitats. The Plan generally applies to all land within each site’s boundaries, with a few exclusions. The annual operations plan will articulate specific areas for sharpshooting operations.

To evaluate the potential for significant impacts, agencies consider the setting and potentially affected environment in which impacts may occur. In this case, the selected action may beneficially or adversely impact forest regeneration, the deer population, and cultural landscapes.

Historically, forests in the region were dominated by plants that thrive in moderate moisture conditions (that are neither excessively dry nor wet), including American chestnut (*Castanea dentata*), oaks (*Quercus* spp.), hickories (*Carya* spp.), maples (*Acer* spp.), and other hardwood species. One of the current, most influential ecological drivers of forest change is selective browsing by deer. In many regions of Pennsylvania, high deer densities have led to a decline in forest regeneration.

Deer are the dominant large herbivore across FLNI, FONE, and FRHI, with population densities reaching unprecedented levels today due to a lack of predators and their ability to adapt to fragmented agricultural and suburban landscapes.

The deer population levels at these sites are approximately 70 to 120 deer per square mile. This number has the potential to double based on deer densities observed at other units of the national park system within the northeastern U.S. Densities at this level are incompatible with sustainable ecosystem balance, affecting the quality of habitat and the amount of available browse.

The altered vegetation patterns driven by deer overabundance also affect the historic character and cultural landscapes within the sites. Dwindling native vegetation at FONE threatens the integrity of FONE's Great Meadows landscape and hinders efforts to reestablish the 1754 tree line. Deer overbrowsing threatens establishment of historic plantings at the Friendship Hill estate, as identified in the FRHI Cultural Landscape Report and FRHI Foundation Document. Lastly, deer overbrowsing at FLNI hinders forest regeneration within the crash site at the Hemlock Grove and surrounding forest. It also affects the establishment of ornamental plantings within the memorial landscape.

Degree of Effects of the Action

The NPS considered the following actual or potential project effects in evaluating the degree of the effects for the selected action. As documented in Chapter 3: Affected Environment and Environmental Consequences of the EA, the NPS evaluated impacts on forest regeneration, deer populations, and cultural landscapes. The NPS did not identify any significant adverse effects associated with implementing the selected action. Effects will be primarily beneficial and long-term, with any adverse effects being minor, temporary, and effectively mitigated through best management practices.

Beneficial and adverse, short-term, and long-term effects of the selected action

Forest Regeneration

In the short term, reducing deer densities through sharpshooting will immediately decrease browsing pressure on seedlings, saplings, and understory vegetation. Over subsequent decades, long-term effects on forest regeneration will likely be strongly beneficial. Sustained reductions in deer density to approximately 20 deer per square mile will allow native canopy-forming tree species to recruit and mature, increase understory density and species diversity, improve soil conditions, and reduce competitive advantages held by invasive plants. Over decades, forests will ideally shift from a trajectory of regeneration failure to one of ecological recovery. Therefore, the selected action will not have significant adverse impacts to forest regeneration.

White-Tailed Deer Population

Immediate reduction in competition for food among the remaining deer will lead to improved herd condition. These lower deer densities will allow for the recovery of forest habitats over the coming decades. Having a higher supply of native, palatable vegetation will reduce nutritional stress, improve body condition, promote antler development, boost fawn survival, and lower susceptibility to disease. As forest habitats recover, the landscape will be better able to support a healthy, sustainable deer population with available resources. Therefore, while the total population will decline, this will allow improved deer condition so the selected action will not have significant adverse impacts to the deer population.

Cultural Landscapes

Reduced deer density will benefit all three sites both immediately (less browsing of new plantings) and over decades (regeneration of forests). Reduced deer browsing will protect and restore vegetation that contributes to character-defining features such as forest-meadow boundaries, designed landscapes, memorial plantings, perimeter viewsheds, and historic settings. Improved forest regeneration will enhance each site's ability to convey its historic context,

feeling, setting, and associations. Therefore, the selected action will not have significant adverse impacts on cultural landscapes.

Degree to which the selected action affects public health and safety

The selected action accounts for public health and safety during implementation and will not result in adverse impacts. Activities will be conducted in a controlled manner, with limited opportunity for interaction between deer management operations and visitors. Actions will occur when parks are closed or under restricted-access conditions, avoiding potential exposure to visitors. Therefore, the selected action will not have significant adverse effects on public health and safety.

Effects to federal, state, tribal, or local laws protecting the environment

The NPS coordinated with the U.S. Fish and Wildlife Service, the State Historic Preservation Officer (SHPO), culturally affiliated tribes, the Pennsylvania Game Commission, and other state and local stakeholders to ensure that the selected action complies with all other federal, state, tribal, and/or local laws protecting the environment. For more detail see the “Other Compliance and Consultation” section below. Therefore, the selected action will not have significant adverse effects to federal, state, tribal, or local laws.

Economic effects

The selected action will have no adverse economic effects and will provide modest benefits. Implementation may support very limited employment and spending associated with deer management activities, such as hiring sharpshooters and local butchers to process the meat for harvest. Additionally, the NPS will donate some meat locally. Therefore, the selected action will not have significant adverse economic effects.

Effects on the quality of life of the American people

Depending on individual perceptions, the selected action will contribute to either an adverse or beneficial impact for visitor experience. Reducing deer density to sustainable levels will improve forest regeneration and understory plant communities. This change will enhance passive use of ecosystems, give the park more interpretation opportunities, and improve the quality of cultural landscapes for visitors. Other visitors may object to lethal deer management. The NPS will conduct culling activities at night when the park is closed to visitors, thus mitigating this impact.

For areas adjacent to the parks, lower deer densities could improve public health and safety by reducing vehicle-deer collisions and some disease vectors (e.g., tick-borne disease risk). However, some nearby residents could have fewer deer for recreational hunting. Where feasible, the NPS will avoid culling large bucks and will schedule operations after the regular hunting season. This will allow hunters on adjacent properties the opportunity to harvest large bucks that range beyond park boundaries.

The NPS evaluated these effects at the local level. The selected action is not anticipated to have adverse effects on the public at the state or national level. The NPS also does not anticipate the selected action will impact access to products, public services, or way of life and culture for Native Americans. Based on the EA analysis, the selected action will not have significant adverse impacts to the quality of life of the American people.

OTHER COMPLIANCE AND CONSULTATION

Endangered Species Act (Section 7)

In compliance with Section 7 of the Endangered Species Act, the NPS evaluated the selected action to determine the potential for effects on federally listed species and designated critical habitat. Federally listed species that may occur in the region include several bat species; however, implementation activities (e.g., nighttime sharpshooting, no ground disturbance) are not expected to affect listed species or critical habitat. The NPS determined the selected action will have no effect on federally listed species, and therefore did not require formal consultation with the U.S. Fish and Wildlife Service.

National Historic Preservation Act (Section 106)

The NPS conducted Section 106 consultation concurrently with, but separate from, the NEPA process. On September 3, 2025, the NPS initiated review with the Pennsylvania SHPO through PA-SHARE, their online project management system. On September 9, 2025, SHPO concurred with the NPS determination that there will be no adverse effect on historic properties and no effect on archeological resources.

Tribal Consultation

In accordance with the NHPA, Executive Order 13175, and NPS policy, the NPS consulted with six federally recognized, culturally affiliated Tribes: the Delaware Nation of Oklahoma, the Delaware Tribe of Indians, the Eastern Shawnee Tribe of Oklahoma, the Osage Nation, the Seneca-Cayuga Nation, and the Shawnee Tribe. Three Tribes responded: the Delaware Nation of Oklahoma and the Osage Nation requested to remain informed but indicated no further consultation was necessary due to the lack of ground disturbance; the Delaware Tribe of Indians declined participation.

FINDING OF NO SIGNIFICANT IMPACT

Based on the information contained in the EA and described above, the NPS has determined that the selected action does not constitute a major federal action that meets the criteria normally requiring preparation of an environmental impact statement (EIS). Therefore, an EIS will not be required.

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.

Recommended:

STEPHEN CLARK

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CLARK

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Stephen M. Clark, Superintendent
National Parks of Western Pennsylvania

Date

Approved:

**JENNIFER
FLYNN**

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JENNIFER FLYNN
Date: 2026.07.25
08:47:07 -04'00'

Jennifer Flynn, Acting Regional Director
National Park Service, Interior Region 1

Date

Appendix A: Non-Impairment Determination

Appendix B: Public EA Review

APPENDIX A: NON-IMPAIRMENT DETERMINATION

INTRODUCTION

The National Park Service (NPS) Organic Act of 1916 directs the U.S. Department of the Interior and the NPS to “conserve the scenery, natural, and historic objects, and wildlife in the System units, and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife, in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 USC § 100101(a)). *Guidance for Non-Impairment Determinations and the NPS NEPA Process* (April 2025) provides guidance on completing non-impairment determinations for NPS actions that require preparation of an environmental assessment (EA) or environmental impact statement (EIS) pursuant to the National Environmental Policy Act (NEPA). The NPS has completed a determination of no impairment analysis for the White-Tailed Deer Management Plan EA for Flight 93 National Memorial, Fort Necessity National Battlefield, and Friendship Hill National Historic Site, and determined that it will not result in impairment of park resources or in unacceptable impacts as described in § 1.4.7.1 of the NPS *Management Policies 2006*.

NPS *Management Policies 2006*, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service the management discretion to allow impacts within parks, the 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 is the cornerstone of the 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.

An action constitutes impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an 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;
- 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 (NPS 2006, Section 1.4.5).

NPS non-impairment analysis normally does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, park operations, wilderness, etc., as these

do not constitute impacts to park resources and values subject to the non-impairment standard under the Organic Act. See Management Policies § 1.4.6.

DETERMINATION OF NO IMPAIRMENT FOR THE WHITE-TAILED DEER MANAGEMENT PLAN ENVIRONMENT ASSESSMENT FOR FLIGHT 93 NATIONAL MEMORIAL, FORT NECESSITY NATIONAL BATTLEFIELD, AND FRIENDSHIP HILL NATIONAL HISTORIC SITE

As a basis for evaluating the potential for impairment on the park units' resources, the NPS relied on the EA. The EA includes analysis of impacts to forest regeneration, white-tailed deer (hereafter deer) population, and cultural landscapes. The NPS dismissed some resource impacts, such as archeological resources, special status species, and other wildlife and wildlife habitat, from detailed analysis in the EA. Please refer to the "Impact Topics" section of Chapter 1 of the EA for a discussion of impact topics considered but dismissed from detailed analysis. Those resources are not evaluated in this document because their impacts are so small that they cannot result in impairment and do not warrant further discussion.

The EA evaluated two alternatives for managing deer populations in the park units: the no-action alternative and Alternative B, the selected action. The Finding of No Significant Impact (FONSI) summarizes the selected action and Chapter 2 of the EA describes it in more detail. The project area encompasses most lands within the boundaries of Flight 93 National Memorial (FLNI), Fort Necessity National Battlefield (FONE), and Friendship Hill National Historic Site (FRHI) in western Pennsylvania. As disclosed in the EA, implementing the selected action will result in overall beneficial impacts to park resources, including the fundamental natural and cultural resources and values described below, compared to current conditions. These benefits will result from reducing overabundant deer populations and alleviating overbrowsing by deer, allowing forest vegetation and cultural landscapes to recover and be managed toward desired conditions.

Purpose and Fundamental Resources and Values of the Sites

Flight 93 National Memorial

The Foundation Document, Flight 93 National Memorial describes the purposes of FLNI, along with park significance statements and descriptions of the park's fundamental resources and values. The park's purpose is:

The purpose of the Flight 93 National Memorial is to honor and commemorate the passengers and crew whose courageous actions prevented a terrorist attack on our nation's capital, part of a larger attack on America on September 11, 2001, and to interpret this history. Flight 93 National Memorial preserves the crash site and manages the memorial landscape in western Pennsylvania.

Fundamental Resources for FLNI affected by the selected action include the memorial landscape, sense of place, and living memory. As noted in the FLNI Foundation Document, these resources include the crash site, pre-9/11 mining sites, and post-9/11 temporary memorial and investigation locations, as well as natural resources. Some fundamental resources and values will not be affected by the selected action, or the impacts will be so small as not to warrant a more detailed analysis here. Those include collections and partnerships.

Fort Necessity National Battlefield

The Foundation Document, Fort Necessity National Battlefield describes the purposes of FONE, along with park significance statements and descriptions of the park's fundamental resources and values. The park's purpose is:

Fort Necessity National Battlefield preserves the sites of the opening battles of the French and Indian War and commemorates George Washington's early military career and the global consequences of the conflict.

Fundamental Resources for FONE affected by the selected action include Fort Necessity, The Great Meadows, and The Civilian Conservation Corps structures. As noted in the FONE Foundation Document, these resources include remnants of the original earthworks, the site where the Battle of Fort Necessity occurred, and the roadbed, culverts, bridges, fireplaces, picnic shelters, and drinking fountains built by the Civilian Conservation Corps (CCC). Some fundamental resources and values will not be impacted by the selected action, or the impacts will be so small that they did not warrant a more detailed analysis here. Those include historic artifacts, commemorative monuments, and the Mount Washington Tavern.

Friendship Hill National Historic Site

The Foundation Document, Friendship Hill National Historic Site describe the purposes of FRHI, along with park significance statements and descriptions of the park's fundamental resources and values. The park's purpose is:

Friendship Hill National Historic Site commemorates the life of Albert Gallatin, an accomplished statesman and scholar in the decades following the creation of the United States, through the preservation of his pastoral estate.

Fundamental Resources for FRHI affected by the selected action include the Friendship Hill Estate. As noted in the FRHI Foundation Document, these resources include the knoll on which the house was built, vistas of and from the knoll, the meadows, and wooded areas. Some fundamental resources and values will not be impacted by the selected action, or the impacts will be so small that they did not warrant a more detailed analysis here. Those include historic artifacts, commemorative sites, or physical structures.

Forest Regeneration

The selected action will relieve browsing pressure and support forest regeneration across park landscapes. Reducing deer densities will allow native species recovery, enabling seedlings and saplings to reach maturity. While it can take decades for forests to fully regenerate, some incremental changes may be observed sooner, indicating that regeneration is underway. Population control of deer increases seedling density and height in palatable canopy-forming species. This is particularly true when maintaining deer densities below 15-20 deer per square mile (5.8-7.7 deer per square kilometer) throughout the region. Reducing browsing pressure allows for greater species and structural complexity in understory layers, supporting a greater diversity of native canopy and subcanopy species. Lower browsing pressure is also associated with higher-quality soil conditions that support nutrient cycling and moisture retention, both of which are conducive to forest regeneration and long-term ecological health. Under reduced deer densities, invasive species will

also face greater competition from native species, potentially reducing their prevalence in the understory herbaceous and seedling layer.

The Plan's strategic reductions in deer densities will transition the sites' forested areas from the current trajectory of ecological degradation toward recovery and resilience. The Plan will support ecosystem function, increase biodiversity, and restore the structural integrity of remnant eastern deciduous forest habitats over decades across the three park landscapes.

Under the Plan, efforts at meadow restoration, planting, and reforestation will be more successful because deer are no longer immediately overbrowsing new plantings and native vegetation. Management of invasive plants also will become more effective over time because native species could more successfully compete with invasive vegetation. With reduced deer browsing, the NPS expects native trees and shrubs to begin reestablishing in areas where they were formerly extant. Furthermore, the NPS anticipates reduced spread of invasive vegetation into new areas across the sites, as robust native plant communities will be better equipped to compete with newly dispersed invasive plants across park landscapes. Finally, controlling deer populations gives existing vegetation management efforts a better chance of producing positive returns on the time and money invested, which will also help accelerate vegetation restoration efforts aimed at forest regeneration.

None of the impacts described above will interfere with the sites' respective purposes or fundamental resources and values. Rather, supporting native vegetation in these ways will result in improvements to cultural resources relevant to the sites' purposes, as described in the "Cultural Resources" section below. No impacts on forest regeneration will rise to the level of unacceptable or impairment.

White-Tailed Deer Population

The selected action will use sharpshooting to reduce deer numbers within the sites from current levels and then maintain the lower density. This deer reduction will eventually lower nutritional stress among the deer herds, resulting in an overall increase in health and vitality of the remaining deer. Immediate changes in health and vitality in the deer herd may include reduced competition for available food sources due to fewer deer in the vicinity. Positive effects on deer health from habitat improvements will take longer to notice because their forested habitats will take decades to recover from overbrowsing. Over the decades, reduced deer density is likely to allow forest habitats to recover. This, in turn, will bring the overall ecosystem into balance, allowing the forest to sustain a healthy deer herd by increasing the supply of native, palatable vegetation and mast-producing trees. Fawn mortality due to nutritional stress is expected to decrease, and deer weight and antler development could increase due to habitat improvements.

In combination with current vegetation management actions (invasive species treatments), reducing deer population size will decrease browsing pressure. In turn, this will allow increases in native ground cover and establishment of tree seedlings necessary to replace existing canopy trees as they eventually die from natural causes. Reducing invasive plants will provide additional space and nutrients for native species suitable for deer browsing, thereby enhancing long-term herd health and population viability.

None of the impacts described above will interfere with the sites' respective purposes or fundamental resources and values. No impact on the white-tailed deer population will rise to the level of unacceptable or impairment.

Cultural Landscapes

The selected action will protect forest vegetation integral to the sites' cultural landscapes, allowing forests to regenerate. Sharpshooting and disposal under the selected action will not affect the cultural landscapes at any of the sites, as these actions will be temporary and occur at night when the park is closed to visitors. This will minimize changes to the sights and sounds of the cultural landscape as experienced by visitors. Additionally, each of these sites is in areas where game hunting regularly occurs; therefore, the occasional sound of gunshots related to hunting is not unusual to the landscapes' existing soundscapes, and the impact will not approach the level of unacceptable or impairment. Specific impacts at each park are described below.

At FLNI, the selected action will reduce deer browsing within the memorial landscape. In the Memorial Plaza area, this will mitigate one of the obstacles to successfully maintaining the designed ornamental vegetation. This will ensure the memorial's designed character, feeling, setting, and appearance are protected and maintained. The reduction in deer overbrowsing will also improve the forests' overall condition and health within and adjacent to the park through forest regeneration. At the Hemlock Grove, this will allow the NPS to preserve the natural grove that witnessed the crash of Flight 93, and maintain the setting, feeling, and association of the landscape. The open meadow character of the crash site adjacent to the Hemlock Grove will be retained, and the strong boundary between the meadow and forest will be preserved. The forests in the perimeter viewshed surrounding FLNI will be restored to their natural appearance, and severe deer browse lines will be reduced to allow for a more natural forest appearance. This will preserve and protect the tranquil natural viewshed.

At FONE, the selected action will enhance the NPS's ability to reestablish the historic 1754 forest line, thereby improving the overall setting, feeling, and association of the National Battlefield Landscape. The selected action will result in a landscape with strong forest-meadow boundaries that convey the contrasting positions of the French Army in the dense forest and Washington's troops in the fort surrounded by open meadow. Through this improved landscape, the NPS will be able to accurately portray the dense forest canopy that allowed the French army to retreat to cover during battle. Similarly, under the selected action, natural forest regeneration will improve and protect the historic integrity and character of the CCC Landscape, which will continue to reflect the CCC's efforts to reestablish the once-cleared deciduous forest.

At FRHI, the selected action will improve the historic character and setting of the cultural landscape, as the forested areas can regenerate and retain their dense tree canopy. This will allow the landscape to more fully convey the historic frontier setting and feeling of the site, as dense forest will continue to screen nearby contemporary development from view within the estate. The landscape will be further improved as the historically strong boundaries between meadows and forests are reestablished. As fewer deer are present to browse vegetation, the NPS will be better able to reestablish the historic garden and orchard's designed plantings, allowing the site to more accurately reflect the estate land's appearance and uses during the Gallatin era.

Maintaining and recovering native vegetation and memorial plantings will support the sites' respective purposes and select fundamental resources and values. No impacts on the park cultural landscapes will rise to the level of unacceptable or impairment.

Conclusion

The best available science, advice from subject-matter experts and others with relevant knowledge and experience, and the results of public involvement activities guided this analysis. The NPS has determined that implementation of the selected action will not constitute impairment of the resources or values of Flight 93 National Memorial, Fort Necessity National Battlefield, or Friendship Hill National Historic Site. This conclusion is based on consideration of the sites' purposes and significances, fundamental resources and values, a thorough analysis of the environmental impacts described in the EA, comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction in NPS *Management Policies 2006*.

APPENDIX B: PUBLIC EA REVIEW

The National Park Service (NPS) released for public review the White-Tailed Deer Management Plan (Plan) and Environmental Assessment (EA) for Flight 93 National Memorial, Fort Necessity National Battlefield, and Friendship Hill National Historic Site on April 1, 2026. This document describes the public comment period, the method of analysis, and a summary of public comments received. This review process provided an opportunity for the NPS to solicit public input on the purpose and need for the project, as well as the issues, alternatives, and environmental analysis presented in the EA under the National Environmental Policy Act (NEPA). After the public comment period ended, the NPS used an established protocol to analyze and summarize the public comments received.

PUBLIC OUTREACH

The NPS issued a news release on April 1, 2026 notifying the public and interested parties about the release of the EA and the public comment period. The comment period was open for 30 days, through May 1, 2026.

The NPS invited the public to submit their correspondence on the project via the NPS's Planning, Environment, and Public Comment (PEPC) website; email; postal mail; or hand delivery during a public meeting or to the park headquarters. A piece of correspondence is defined as the entire document received from a commenter. Correspondence examples include letters, written comments forms, text entered directly into PEPC, and any other written comments provided either at the public meetings, by postal mail, or in person at the park. During the open comment period, the NPS received a total of four pieces of correspondence, which commenters all entered directly into the PEPC website.

METHOD OF COMMENT ANALYSIS

At the conclusion of the comment period and upon confirming that no additional pieces of correspondence remained to be entered into PEPC, the NPS reviewed each correspondence and identified specific comments. A comment is defined as a portion of the text within a correspondence that addresses a single subject. It could include information such as an expression of support or opposition to a project, additional data on the existing condition, or suggestions for strategies to consider.

The NPS then reviewed the comments for substantive concerns. Comments that merely support or oppose a proposal; that merely agree or disagree with NPS policy; or that raise questions already covered within the EA are not substantive. A substantive comment is one that

- questions, with reasonable basis, the accuracy of the information in the NEPA documents;
- questions, with reasonable basis, the adequacy of the environmental analyses;
- presents reasonable alternatives other than those presented in the NEPA document; or
- causes changes or revisions in the proposal.

COMMENT SUMMARY

Of the four pieces of correspondence received during the public comment period, two disagreed with the plan to take lethal action to reduce the deer population, one requested hunting rather than hiring sharpshooters, and one suggested reintroduction of deer's natural predators. All issues raised are addressed in the EA under the "Alternatives Considered but Dismissed from Further Analysis" in Chapter 2. Therefore, these comments are not substantive, as defined above, and were not assigned formal responses.