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Consultation and Coordination

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Chapter 5: Consultation and Coordination

5.1 Introduction

Many public agencies; federal, state, and local governments; nonprofit organizations; institutions; and individual citizens have an interest in deer management at Valley Forge NHP. Reaching out to these interested parties for their ideas and expertise and listening to their concerns is an important step in the development of the plan/EIS. A combination of activities, including internal workshops, formal public meetings, and agency and government briefings has helped the NPS gain important guidance in developing alternatives for the plan/EIS.

This chapter describes the public involvement and agency coordination used during the preparation of the plan/EIS. It provides a detailed list of the various consultations held during the scoping and alternatives development phases of the project. The list of recipients for this document also is provided.

5.2 The Scoping Process

The NPS divides the scoping process into two parts: internal scoping and external or public scoping. Internal scoping involves discussions among NPS personnel regarding the purpose of and need for management actions, issues, management alternatives, mitigation measures, the analysis boundary, appropriate levels of documentation, available references and guidance, and other related topics. Internal scoping also includes early contact with federal, state, and local agencies; and Indian tribes with jurisdiction by law or special expertise over some aspect of the proposed action (see Section 5.3).

Public scoping is the early involvement of the interested and affected public in the environmental analysis process. This helps to ensure that people have an opportunity to comment and contribute early in the decision-making process. For this plan/EIS, project information was distributed to individuals, agencies, and organizations at the initiation of the scoping process, and people were given opportunities to express concerns or views and to identify important issues or even suggest other alternatives. The following sections describe the various ways scoping was conducted for this plan/EIS.

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5.2.1 Internal Scoping

An internal scoping meeting was held on September 12 and 13, 2006 to discuss the management of white-tailed deer as part of a healthy and functioning ecosystem at Valley Forge NHP. The goal of this meeting was to determine the purpose, need, and objectives for managing deer at the park, as well as to identify issues and concerns associated with the deer populations and their impact on the park ecosystem. Preliminary alternative management strategies were discussed. The results of the meeting were captured in an Internal Scoping Report (NPS 2006b), which is on file as part of the administrative record for the plan/EIS.

For many years, Valley Forge NHP staff has coordinated with several technical experts and researchers to develop and use methods and protocols for monitoring white-tailed deer population size and forest regeneration within the park. A number of the same scientists and technical experts were invited to become part of the science teams that provided technical background information and researched references during preparation of the deer management plan. The team participants were limited to persons with scientific background in deer management and research, vegetation management and monitoring, and CWD; NPS staff; and others who have background experience with the park or park ecosystems (see References: Planning Team, Contributors, and Consultants).

The purpose of the science team discussions was to provide a technical framework for the development of alternatives for the deer management plan and the CWD response plan. The first team focused on the deer management plan and convened via conference calls, meeting five times over a three-month period (January-March, 2007). The topics of discussion included existing conditions at the park, existing data and monitoring, desired forest composition, population goals for deer, approach to establishing action thresholds and indicator species, and logistics required for various management methods. Following the science team's final meeting, an internal report was prepared to document the group's discussions and recommendations (NPS 2007h). This report was used to inform the alternatives meeting described above.

The second science team, which focused on CWD, was composed of regional and national wildlife management experts from the NPS and PGC (see References: Planning Team, Contributors, and Consultants). The group participated in several phone meetings in June 2008 to discuss and review existing literature, studies, and professional experience related to CWD. The group's discussion focused on the park's proposed response to CWD within the park and its consistency with *Pennsylvania's Chronic Wasting Disease Response Plan* (PCWDTF 2007, 2008). A summary memorandum was prepared to document the results of the group's discussions and recommendations (NPS 2008d). This memorandum was used to inform the CWD Response Plan for Valley Forge NHP (see Appendix C).

5.2.2 Public Scoping

Since the beginning of the planning process for the plan/EIS, the NPS has reached out to stakeholders including the general public, interested individuals, local governments, organizations, and agencies having jurisdiction by law or expertise for assistance in determining the scope of the plan. At different points in the development of the plan/EIS, the NPS provided information and updates via newsletters, news releases, public meetings, the park website, and briefings. A Public Comment Analysis Report (NPS 2007g) was prepared to document the results of the public scoping process. This document was provided for public review on the park web site and is included as part of the administrative record. Table 15 provides a running list of the briefings, consultations, and public involvement activities, and a summary of the public meetings and comments received throughout the scoping period is provided below.

Table 15 Running List of Briefings, Consultations, and Public Involvement

Date	Description
2006	
6/28	Scoping meeting with PGC
9/1	Briefing to West Chester University population biology class
9/12	Internal scoping meeting with interdisciplinary planning team
9/13	Internal scoping meeting with interdisciplinary planning team (cont.)
9/14	Press conference to announce initiation of deer management planning
9/15	Purpose, need, objectives, management strategies, and public meeting dates electronically distributed to Friends of Valley Forge
9/19	Internal scoping meeting with Valley Forge NHP Maintenance Division
9/20	Internal scoping meeting with Valley Forge NHP Administration and Interpretive Divisions
9/20	Superintendent briefing to Rotary Club
9/26	Briefing to Open Land Conservancy board members
9/27	Internal scoping meeting with Valley Forge NHP Interpretation Division
9/27	Superintendent briefing to Tredyffrin Township officials
9/28	Internal scoping with Valley Forge NHP Law Enforcement Division
10/24	Briefing at the Farm Park Preservation Association annual meeting
11/4	Briefing at the Upper Merion Parks and Historic Foundation annual meeting
11/8	Public scoping meeting at Valley Forge NHP Education Center
11/9	Public scoping meeting at Tredyffrin Township Building
11/20	Briefing for Springford Area School District 7th grade teachers
12/7	Agency scoping meeting with DCNR Bureau of Forestry
12/20	Briefing for students at the Armenian Sisters Academy
2007	
1/18	Superintendent briefing with Senator Spector's staff in Washington, D.C.
1/20	Briefing for students at Norristown High School
1/26	Superintendent briefing for Senator John Rafferty and staff member
2/1	Superintendent briefing for Senator Connie Williams and staff member
2/1	Superintendent briefing for Community Garden Club of Wayne
2/2	Briefing with Will McWilliams, USDA Forest Service
2/6	Superintendent briefing for Upper Merion Township Manager
2/7	Superintendent briefing for Tredyffrin Township Manager
2/9	Superintendent briefing with Senator James Gerlach
2/23	Superintendent briefing with West Norriton Township Manager
3/14	Briefing at Open Land Conservancy annual meeting
3/15	Superintendent briefing for Lower Providence Township Manager
4/17	Briefing and park tour with students from Bryn Mawr College
4/28	Guided walk for Open Land Conservancy Preserve Managers
4/30	Presentation for Garden Club of America
7/10	Guided tour USDA Forest Service and DCNR staff
8/10	Discussion on deer management techniques with Owen Prusack, Chester County Parks and Recreation Department
8/14	Discovery Educators tour
8/15	Alternatives development meeting with interdisciplinary planning team
8/16	Alternatives development meeting with interdisciplinary planning team (cont.)
9/5	Discussion on deer management techniques with Barry Bessler, FPC
9/17	Telephone update for new Schuylkill Township Supervisor
10/3	Congressional staff visits in Washington, D.C.
10/11	Guided tour for DCNR Annual District Foresters Meeting
10/19	Briefing for the Sierra Club
11/12	Participation in Chester County Deer Forum Meeting
11/16	Presentation at Great Valley High School
2008	
1/10	Superintendent presentation to 59ers group

Two public scoping meetings, noted above, were held to initiate the public involvement process early in the planning stage and to obtain community feedback on the initial concepts for deer management at Valley Forge NHP. The first meeting was held on November 8, 2006 from 1:00 pm to 4:00 pm at the park's Education Center in King of Prussia, Pennsylvania. On November 9, 2006 a second meeting was held from 6:00 pm to 9:00 pm at the Tredyffrin Township Building. The public scoping meetings were advertised through a mass mailing of the public scoping brochure to over 4,000 individuals. They were also announced on the park's web site, posted on park kiosks, announced through press releases and newspapers, as well as postings at public libraries.

A total of 153 meeting attendees signed in during the two meetings. Prior to the meetings, attendees had an opportunity to observe displays illustrating the study area, purpose and need, plan objectives, deer population monitoring, vegetation monitoring and impacts, deer home range and movements, the history of deer management at the park, and the estimated project schedule as it relates to the NEPA process. The meetings were held in an open house format, so guests could come and go as they pleased. Each meeting began with a presentation by park staff on the background of the project. The presentation was followed by breakout sessions that allowed the guests to discuss issues with the planning team in small groups.

Members of the planning team served as moderators and were note takers for each breakout group. Comments made during the breakout sessions were recorded on large flip charts. If the commenter did not want to make comments at the breakout sessions, comments sheets were available at the sign-in table. Guests could fill out the forms and submit them at the meeting or mail them to the park at any time during the public scoping comment period, which ended December 8, 2006. Those attending the meeting were also directed to the public scoping meeting brochure, which provided additional opportunities for comment on the project, including directing comments to the NPS's PEPC web site at <<http://parkplanning.nps.gov/vafo>> or the park web site at <www.nps.gov/vafo>.

During the comment period, 165 pieces of correspondence were received, with 365 comments. Correspondence was received by one of the following methods: e-mail, hard copy letter via mail, or entered into the web-based PEPC system. Approximately 44% of the comments received related to the objectives in taking action, public hunting, lethal reduction with firearms by professionals, reproductive control, and new alternatives or elements. These comments were summarized in the Public Comment Analysis Report (NPS 2007g) described above.

5.3 Agency Consultation

Agency consultations are summarized below, and relevant agency correspondence is provided in Appendix B.

5.3.1 Tribal Consultations

In separate letters dated November 2, 2006, Valley Forge NHP initiated consultation with the following tribes: Oneida Indian Nation, Oneida Nation of Wisconsin, Delaware Nation, and the Stockbridge-Munsee Community. The Oneida were present during the 1777-78 encampment of George Washington's army and maintain an oral tradition of their experiences with the soldiers. Twice a year, the Oneida visit

Valley Forge NHP to present interpretive programs focused on their experiences during the encampment. The park has enjoyed a long-standing relationship with all of these tribes. These tribes were included in the GMP planning process and will continue to be included in future park planning efforts.

The Oneida Indian Nation responded in a letter dated November 27, 2006. The Oneida noted that the project did not propose to threaten any cultural or religious bonds the tribe holds with Valley Forge.

The Stockbridge-Munsee Community responded in a letter dated January 17, 2007. The tribe noted the potential for archeological sites to exist within the park that may contain human burial remains and associated funerary objects. The tribe referred the NPS to the State Archeologist and SHPO for guidance on archeological resources and surveys. The tribe requested to be notified of any unexpected archeological resource that may be discovered during the course of the project.

The Oneida Nation of Wisconsin and the Delaware Nation did not provide a response to the consultation letters sent by the park.

5.3.2 Section 7 Consultation

In a letter dated December 12, 2006, Valley Forge NHP initiated informal consultation with the USFWS about the presence of federally listed rare, threatened, or endangered species in the vicinity of the park. The agency replied in a letter dated January 11, 2007. In the letter, the USFWS noted that the proposed project is within the range of the bog turtle (*Clemmys muhlenbergii*), but that the project scope and activities are not likely to adversely affect the species. There were no other federally listed species identified within the area.

In a letter dated December 12, 2006, Valley Forge NHP initiated informal consultation with the Pennsylvania Natural Heritage Program about the presence of federally listed rare, threatened, or endangered species in the vicinity of the park. The agency replied in a letter dated April 18, 2007. The letter included a list of seven state-listed species that may occur within the project area. It also noted that several of these species were threatened by deer browse.

5.3.3 Section 106 Consultation

In separate letters dated December 12, 2006, Valley Forge NHP initiated informal consultation with the Advisory Council on Historic Preservation and the Pennsylvania Historical and Museum Commission's Historic Preservation Bureau. The letters not only opened informal consultation with the two agencies, but also made them aware of Valley Forge NHP's intention to use the NEPA documentation to comply with Section 106 of the National Historical Preservation Act of 1966, as amended.

5.4 Document Review and List of Recipients

5.4.1 Review Process for the Deer Management Plan/EIS

This Draft plan/EIS for Valley Forge NHP will be on public and agency review for 60 days. During the review period, the NPS will solicit public and agency comment and hold public meetings that will be advertised in local media outlets. Once comments are received and analyzed, a Final plan/EIS will be prepared that will respond to and incorporate the public comments on the draft document. After a 30-day no-action period, a Record of Decision (ROD) will be prepared to document the selected alternative and set forth any stipulations for implementation of the plan/EIS, thus completing the NEPA compliance requirements.

5.4.2 List of Recipients

Copies of the Draft plan/EIS were distributed to the following government officials and agencies, and nongovernmental organizations and agencies. Copies were also provided to select individuals on the park mailing list. These names are not included below.

Pennsylvania Congressional Delegation

Senator Arlen Specter
Senator Bob Casey
Representative Jim Gerlach
Representative Joe Sestak

Federal Agencies

Advisory Council on Historic Preservation
U.S. Department of Agriculture, Animal and Plant Health Inspection Service
U.S. Environmental Protection Agency, Office of Environmental Programs, Region III
U.S. Fish and Wildlife Service
U.S. Forest Service
U.S. Public Health Service

Tribal Nations

Delaware Nation
Oneida Indian Nation (New York)
Oneida Nation of Wisconsin
Stockbridge Munsee Community

Commonwealth Legislative Delegation

Senator John C. Rafferty
Senator Andrew E. Dinniman
Senator Daylin Leach
Representative Mike Vereb
Representative Tim Briggs
Representative Paul J. Drucker

Commonwealth Agencies

Pennsylvania Department of Agriculture, Bureau of Farmland Protection
Pennsylvania Department of Conservation and Natural Resources, Bureau of Forestry
Pennsylvania Department of Conservation and Natural Resources, Bureau of State Parks
Pennsylvania Game Commission, Bureau of Wildlife Management
Pennsylvania Historical and Museum Commission

Local Governments

Chester County Commissioners
Chester County Conservation District
Chester County Planning Commission
Fairmount Park Commission
Montgomery County Commissioners
Montgomery County Conservation District
Montgomery County Planning Commission
Lower Providence Township
Schuylkill Township
Tredyffrin Township
Upper Merion Township
West Norriton Township

Organizations and Agencies

Audubon Pennsylvania
Center for Animals and Public Policy
Chester County Library and District Center
Green Valleys Association
Humane Society of the United States
Montgomery County-Norristown Public Library
National Parks Conservation Association
Non-lethal Options for Animals
Open Land Conservancy
Pennsylvania Deer Association
Pennsylvania Quality Deer Management Association
Phoenixville Public Library
Responsible Policies for Animals, Inc.
Sierra Club, Pennsylvania Chapter
The Friends of Valley Forge NHP
Tredyffrin Public Library
Upper Merion Township Library
Valley Forge Historical Society
Valley Forge Chapter of Trout Unlimited
Valley Forge Convention and Visitors Bureau

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