

Purpose of and Need for Action

INTRODUCTION

During the planning process for the Valley Forge NHP General Management Plan / Environmental Impact Statement (NPS 2006), the NPS identified the Philander Chase Knox House as a building that is not necessary to support visitor services or operations, and also identified appropriate and self-sustaining non-park uses for this building. In accordance with the approved GMP, the NPS now proposes to lease, through a request-for-proposals process, the house and surrounding grounds to an entity that would manage private events throughout the year. A gravel parking lot also would be constructed on estate grounds to provide parking for private events (see Figures 1 and 2). The parking lot would be available for use only during events at the estate.

This Environmental Assessment/Assessment of Effect (EA/AOE) evaluates two alternatives: the proposed action (NPS preferred alternative) and the no action alternative. The EA/AOE further analyzes the potential impacts these alternatives would have on the natural, cultural, and human environment. This document has been prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA); the regulations of the Council on Environmental Quality (CEQ) for implementing NEPA (40 CFR 1500-1508.9); and NPS Director's Order #12: *Conservation Planning, Environmental Impact Analysis, and Decision-Making* (DO-12), and accompanying DO-12 Handbook. This EA/AOE also complies with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

PURPOSE OF AND NEED FOR ACTION

The purpose of this project is to use NPS leasing authority to ensure preservation of a historic structure and certain associated grounds through enabling an appropriate and compatible use and to allow the community to have responsible and managed access to a historic structure, thereby implementing the approved GMP.

Valley Forge National Historical Park (NHP) was established by the United States Congress in 1976 to:

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

Figure 1. Project Location.

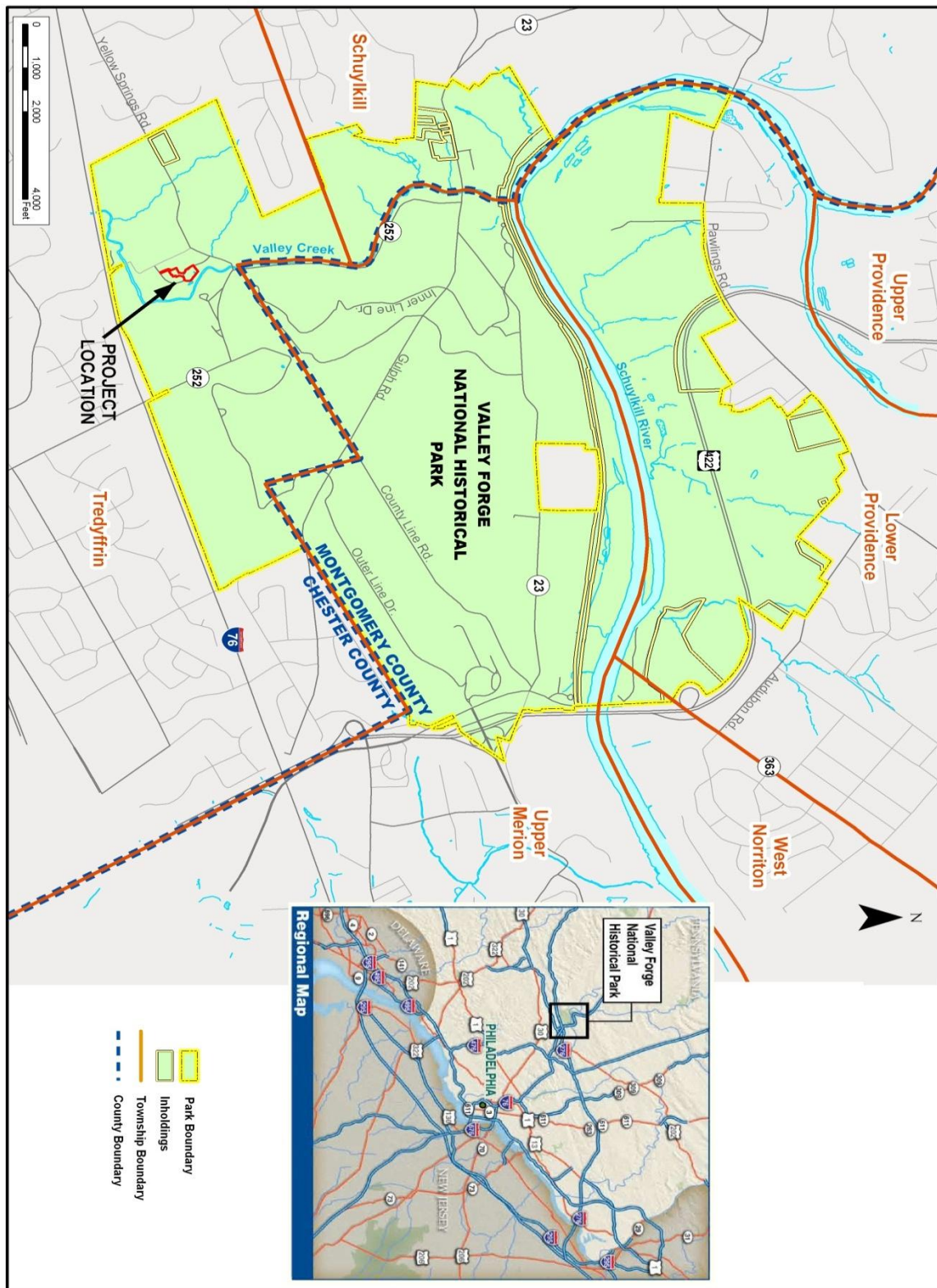
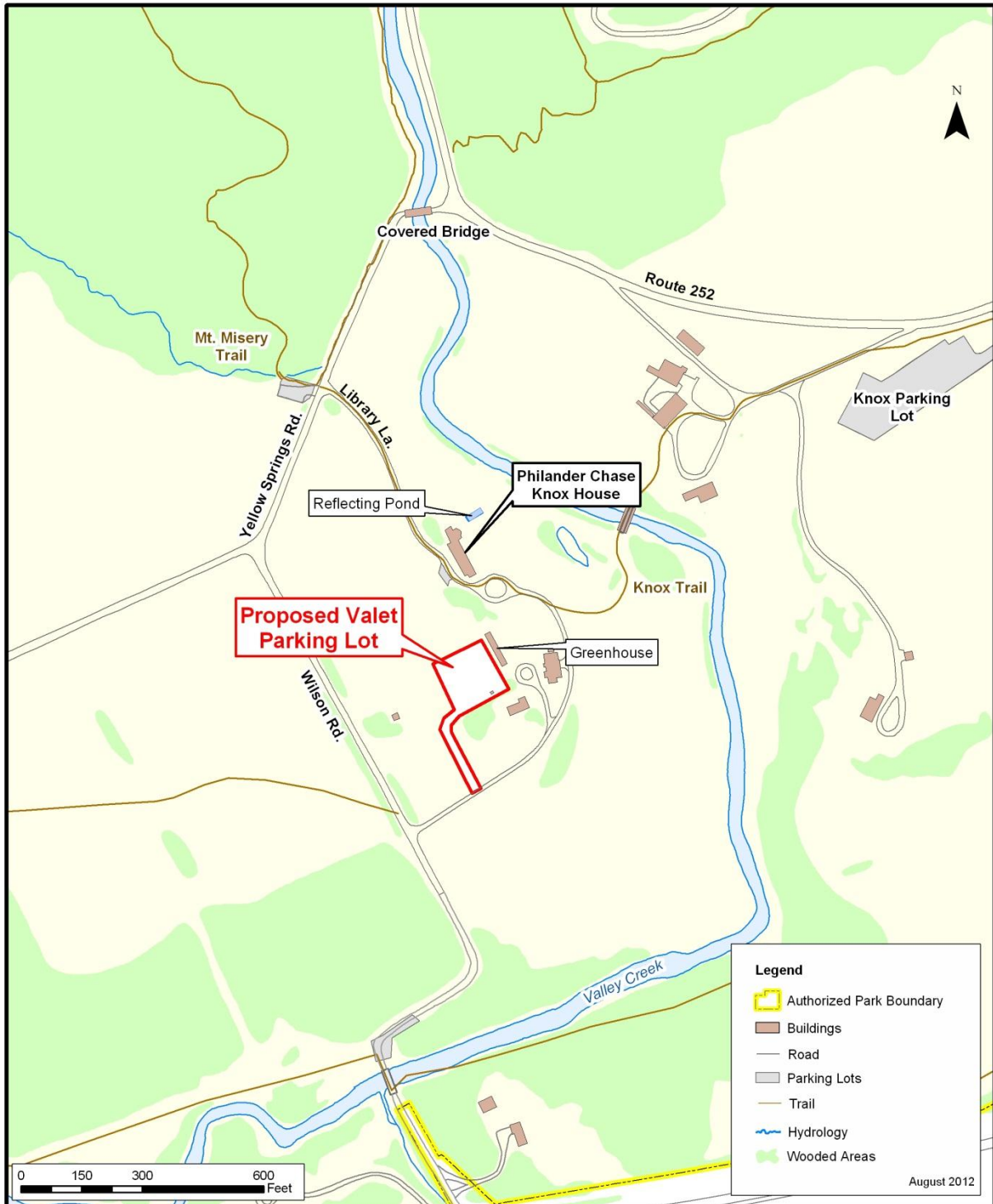


Figure 2. Proposed Parking Area.



The park is nationally significant for its association with the winter 1777-1778 encampment of General George Washington and the Continental Army. It also is significant for the commemorative activities and features developed by the Commonwealth of Pennsylvania when it was a state park, and for its agricultural, industrial, and transportation history and resources.

The park takes its historic preservation mission seriously. It owns and is responsible for maintaining 78 historic buildings. While many of the historic buildings have high value as interpretive sites, some are not suitable candidates for public interpretation because they represent duplicative interpretive stories (e.g., officers' quarters), because it is not feasible to staff so many different buildings, and/or because they are located in isolated areas of the park.

Sixty-six of the park's historic buildings were built after the encampment and do not relate to the park's principle theme, yet the responsibility for their care and ongoing maintenance remains. Some of these are used for park offices and storage, or as quarters for park staff. While this use keeps the buildings heated and prevents vandalism, the maintenance costs are not fully covered in available budget, resulting in buildings that are not optimally maintained, as well as challenges for the park budget.

PROJECT SITE DESCRIPTION

Valley Forge NHP is located in southeastern Pennsylvania, approximately 18 miles northwest of center city Philadelphia. The Schuylkill River divides the park into northern and southern sections, and Valley Creek further divides the southwestern section. Valley Forge NHP encompasses over 3,400 acres. The proposed action is confined to approximately three acres near the southwestern boundary of the park.

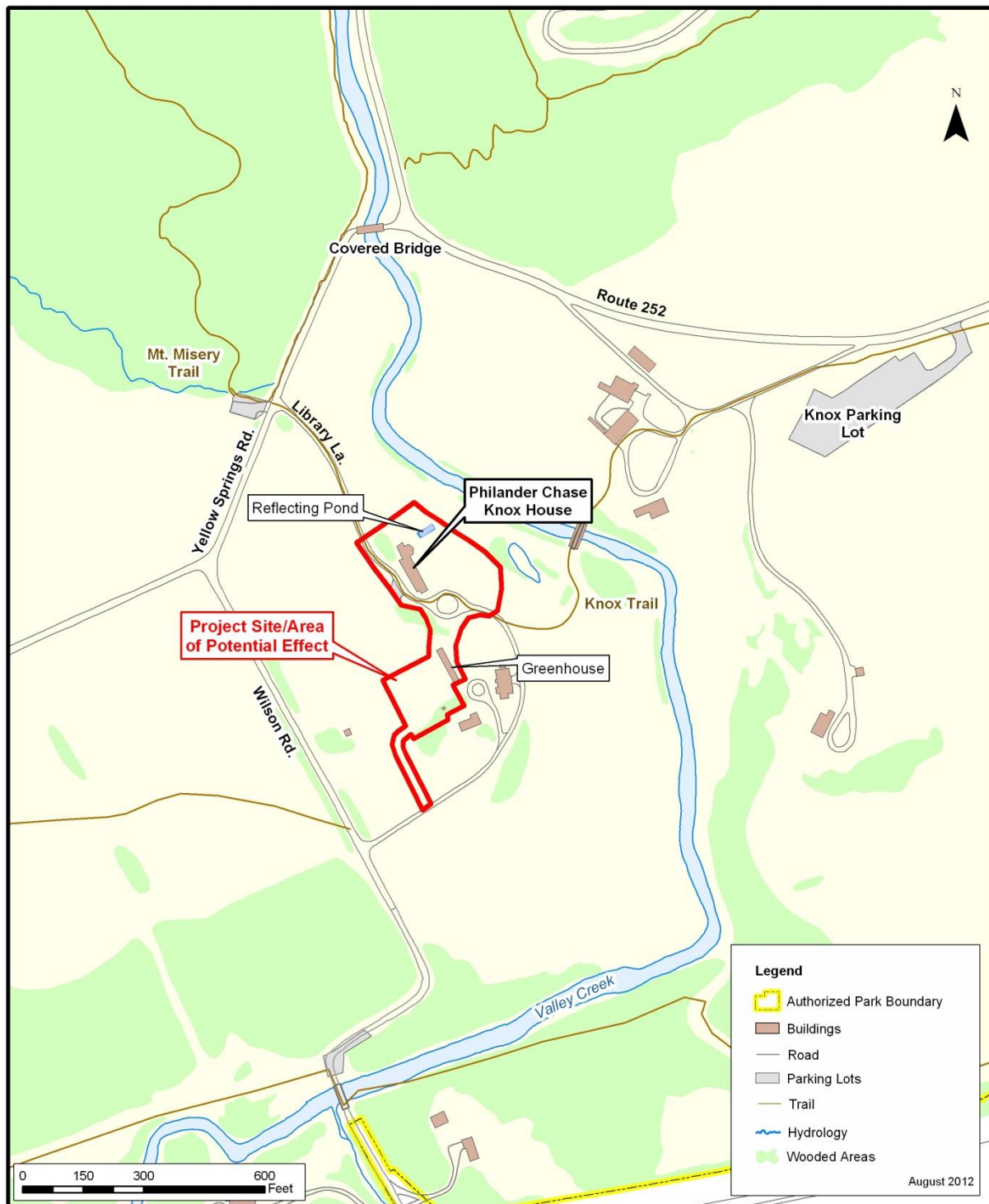
The project site is an area within the former P. C. Knox estate, which is bounded to the north by Yellow Springs Road, to the east and south by Valley Creek, and to the west by Wilson Road (Figure 3). The estate is served by Library Lane, a park road that extends between Yellow Springs Road and Wilson road. The estate comprises the main house, chauffeur's quarters, and tenant house and the ruins of a greenhouse, walled garden, swimming pool, and tennis court. The project comprises the main house and the grounds immediately surrounding it, Library Lane, and the former walled garden area.

PROJECT BACKGROUND

The *Valley Forge National Historical Park Draft General Management Plan/Environmental Impact Statement* (GMP/EIS) (NPS 2006) and *Record of Decision* (NPS 2007) set goals and guidance for Valley Forge NHP in terms of resource management and visitor use and experience while analyzing the impacts of various proposed actions. As noted above, the Knox House was determined to be not necessary to support visitor services or operations needed to carry out the mission of Valley Forge NHP. The GMP identified appropriate and self-sustaining non-park uses for this building that could be achieved through leasing.

36 CFR Part 18 – Leasing of Properties in Park Areas (16 U.S.C. 1a–2(k); 16 U.S.C. 470h–3) gives the National Park Service (NPS) authority to lease buildings, provided certain criteria are met (see page 1-3, "Determinations for a Lease for Philander Chase Knox House"). The law recognizes that many parks are

Figure 3. Project Site/Area of Potential Effect.



responsible for maintaining a large portfolio of historic and modern buildings, and that some of these buildings are not necessary or suitable for visitor services or park operations. Exercise of the authority enables a park to work with a community to rehabilitate and keep these buildings in good condition, and may in some cases provide revenue to the park, according to the regulations at 36 CFR 800.8.

Determinations for a Lease for Philander Chase Knox House

As part of this EA/AOE process to this leasing action, park staff evaluated potential use of the buildings according to criteria established by 36 CFR Part 18, Section 18.4. Based on this analysis, the NPS considers the proposed lease and the uses authorized to be appropriate and compatible and consistent with the purposes for which the park was established, and that the terms of the lease will adequately preserve the leased premises. Positive findings were made for each of the following criteria:

- The lease would not result in degradation of the purposes and values of the park area.
- The lease would not deprive the park area of property necessary for appropriate park protection, interpretation, visitor enjoyment or administration of the park area.
- The proposed lease would contain such terms and conditions as would assure that the leased property would be used for activity and in a manner that are consistent with the purposes established by law for the park area in which the property is located.
- The lease would be compatible with the programs of the NPS.
- The lease would be for rent at least equal to the fair market value rent of the leased property.
- The proposed activities under the lease are not subject to authorization through a concession contract, commercial use authorization, or similar instrument.
- Because the lease would include historic property, it would adequately ensure the preservation of the historic property.

Scoping

The scoping process is initiated at the beginning of a NEPA project to allow agencies and interested parties the opportunity to provide information and identify the range of issues, resources, and alternatives to address in the EA/AOE. Both internal and public scoping was held to address these elements. Interested parties were notified of the planning process. A scoping announcement inviting public comment was posted on the park's website, Facebook page, Twitter feed, and the park bulletin board adjacent to the project site, and distributed through the Friends of Valley Forge Park newsletter.

Local government and relevant agencies were contacted during the scoping period, including Tredyffrin Township, the Pennsylvania Natural Diversity Index, the Pennsylvania State Historic Preservation Officer, and the U.S. Fish and Wildlife Service. In addition, the following Indian Tribes were contacted: the Oneida Nation of Wisconsin, the Oneida Indian Nation, the Stockbridge-Munsee Community of Wisconsin, and the Delaware Nation. For further scoping and public participation information, see "Chapter 5: Consultation and Coordination" of this document and "Appendix B: Relevant Correspondence" according to the regulations 36 CFR 800.8.

HISTORY AND SIGNIFICANCE OF VALLEY FORGE NHP

Valley Forge NHP encompasses the site of the 1777-78 winter encampment of the American Continental Army under General George Washington. Although this represents only a brief period of the American Revolution, it marks a significant period in American history. As such, it has become essential to the understanding and commemoration of the founding principles of the United States.

By the time of the encampment most of the land in the area had been cleared for agriculture. Within what is now the park, 18 landowners established fairly prosperous farms on the choice agricultural soil. Along Valley Creek, an iron works named Valley Forge was established and a small industrial village developed. Upon arrival the soldiers would have found an open, rolling landscape divided into small crop farms and pastures, with a few farmhouses and out buildings.

Although the scale and intensity of the encampment devastated the landscape, the farmers were able to recover quickly. As well, during the 19th century industry thrived in the villages of Valley Forge and Port Kennedy. It was not until the eve of the encampment's hundredth anniversary that citizens began to think about and plan for preservation and commemoration of the encampment.

In December 1877, citizens convened and incorporated as the Centennial and Memorial Association in order to commemorate the centennial of the encampment and preserve Washington's Headquarters. The building was acquired in 1879, restored, and furnished. A rising interest in the Valley Forge story also resulted in the establishment of Pennsylvania's first state park in 1893. Little by little, the Valley Forge Park Commission acquired the lands on which the encampment had taken place, including the project area, and created a memorial park with monuments and managed landscapes for both commemoration and recreation. As the country began to celebrate its bicentennial, the park was transferred to the NPS in 1976.

The park is nationally significant for its association with the winter 1777-1778 encampment of General George Washington and the Continental Army. It also is significant for the commemorative activities and features developed by the Commonwealth of Pennsylvania when it was a state park, and for its agricultural, industrial, and transportation history and resources.

HISTORY AND SIGNIFICANCE OF THE PROJECT SITE

The project site was occupied and used by Native American peoples from about 8,000 BCE to the 17th century, when William Penn received a charter for what would become Pennsylvania from British King Charles II. Several owners controlled the site up until the time of the Encampment of 1777-78. Although the P.C. Knox House is traditionally identified as the site of Brigadier General William Maxwell's quarters, research has revealed that no structure stood at this location during the Encampment. It is likely that Maxwell, commander of the New Jersey Brigade, established his headquarters somewhere nearby rather than here, despite the legend. The earliest section of what became the P.C. Knox House was not constructed until 1785.

In 1893 the land was purchased by the Matthews family, who had become millionaires as a result of the California gold rush. They converted the ordinary farmhouse into a gentleman's country seat, extensively remodeling it into an elaborate Queen Ann style mansion with numerous additions. The

estate was completed with the construction of a swimming pool, bath house, racetrack, and tennis court. Here they bred horses, making the estate famous as a stock farm.

The property was purchased by Philander Chase Knox in 1903. He wanted a place a reasonable distance from Washington, D. C. that could serve as a weekend retreat and where his son's love of horse breeding and stock raising could be indulged. Knox had been a successful lawyer in Pittsburgh, serving clients such as Henry Clay Frick and Andrew Mellon. He also was a member of the South Fork Fishing and Hunting Club, a private resort serving the wealthy industrialists of Pittsburgh and centered on Lake Conemaugh. When the club's unmaintained dam failed and the resulting flood killed over 2,200 people in what became known as the Johnstown Flood, Knox successfully defended a subsequent suit, arguing that the failure was an act of God. Knox played a key role in the 1892 workers' strike against the Carnegie Steel plant in Homestead, Pennsylvania, during which there was a gun battle between the steel workers and Pinkerton guards. He had proposed hiring the guards, and later convinced the Pennsylvania Chief Justice to charge the strike leaders with treason. Ultimately, Knox handled setting up the U.S. Steel Corporation when Andrew Carnegie sold out to J.P. Morgan.

Knox was appointed United States Attorney General at the start of President William McKinley's second term in 1901. At the request of Theodore Roosevelt, Knox remained in that position after McKinley's assassination. Surprisingly, given the emphasis of his former law practice, his most outstanding accomplishment was implementation of laws and policies restraining monopolies and cartels, changing the manner in which the federal government handled interstate commerce, and for his leadership in the "trust busting" suit against Northern Securities, a large railroad holding company. In 1904 he was appointed the U.S. Senator for Pennsylvania by the governor. Knox unsuccessfully ran for nomination as the Republican presidential candidate in 1908, and then served as the Secretary of State under President William Howard Taft from 1909-1913. During this term he devoted much effort to the promotion of the "Open Door" policy of increasing U. S. trade by supporting American enterprises in Europe, Latin America, and the Far East. Knox was involved in the development of many important federal acts and bills of legislation involving trusts and the regulation of corporations. He was instrumental in drafting the legislation that created the Departments of Commerce and Labor, and helped to reorganize the State Department. He again served as a U.S. Senator from 1916 until his death in 1921.

For the first seven years of Knox's ownership, the property essentially was kept as it had been during the Matthews years. On the east side of the creek, Knox added a large house as a wedding present for his daughter; the house now is known as the Knox-Tindle House. It was designed by the fashionable architect, R. Brognard Okie, of Duhring, Okie, and Ziegler of Philadelphia. Okie was a successful and sophisticated exponent of the Colonial Revival style, particularly that with roots in the stone houses of southeastern Pennsylvania.

When Knox first retired from public service in 1913 he began extensive alterations, hiring Okie once more to transform the P.C. Knox House from a Queen Anne-style mansion into the Colonial Revival estate that is seen today. The extensive alterations included the removal of the main roof to create a lower plate line, removal of the entrance pavilion to create an open entrance porch, and replacement of the glass porch with a large library with fireplace and half circle bay window. The interior received new

millwork of the Colonial Revival genre. Four complete bathrooms and a powder room were added, along with floor to ceiling windows in the dining room. The outside was transformed with the removal of the porte-cochère and the addition of a stone terrace featuring Mercer tiles depicting 18th century craftsmen. Formal stairs lead from the terrace to the lawns, pool, and the creek below. The large stone barn was demolished and replaced by a nearby garage with chauffeur's quarters.

Okie gave close attention to many details such as mantels, stair parts, and cabinets. The woodwork was painted in the typical revival fashion of off-white, with paper covering the walls. The house was considered such a success that it was featured in the 1916 Yearbook of the Philadelphia Chapter of the American Institute of Architects.

After Knox' death in 1921, his daughter moved into the main house, keeping it as it had been during her father's lifetime. Until her death, Mrs. Tindle, an avid gardener, maintained the terraced gardens, a greenhouse, a walled garden, and a summer house southwest of the main house. In 1965 the property was sold by her sons to the Commonwealth of Pennsylvania to become part of Valley Forge State Park. In July of 1976 the state park was recognized for its importance in the creation of the United States and as such became part of the National Park System.

P.C. Knox's former law library now houses the park's Horace Willcox Memorial Library. The former parlor and dining room serve as a park meeting space. Some rooms on the second floor are used as secure storage for park historic furnishings.

The property is significant for its association with the 1777-78 encampment of the Continental Army, including the terrain, creek, and ford. The property also is significant for its association with Philander Chase Knox, who held cabinet positions in three presidential administrations and twice served as a U.S. senator for Pennsylvania, while maintaining his primary residence here. The property is noteworthy for its association with the country estate period.

PLANNING ISSUES AND CONCERNS

Planning Issues

During the scoping process, specific considerations were identified as important to the planning process: preservation of cultural resources, stormwater management, safety and accessibility, traffic and circulation, visual quality, and sustainability. With the purpose of and need for the proposed action, these considerations contributed to the selection of impact topics, as identified in the next section.

Preservation of Cultural Resources. The architectural features and cultural landscape of the P.C. Knox Estate are significant cultural resources. Proposed uses and modifications must avoid not only serious adverse effects to these resources, but also conditions that could impact them in the future.

Stormwater Management. The construction of the gravel parking lot will result in additional stormwater runoff. The existing swales and open pasture where the former horseracing ring was located will help mitigate runoff. Project design should address the absorption of stormwater, however.

Safety and Accessibility. The safety of future visitors and the provision of measures ensuring universal accessibility to the portions of the house and grounds that are proposed to be open to public use are key concerns. Modifications must include universal accessibility, ensure the safety and circulation of visitors, yet respect the integrity of the historic features of the site.

Traffic and Circulation. Potential increases to traffic on Yellow Springs Road and across the Covered Bridge, as well as circulation and management of event-related vehicles on the project site must be considered.

Visitor Use. The project site is the nexus of several trails, and their presence must be considered during project planning.

Visual Quality. The site is part of the cultural landscape of the park and is visible from other viewpoints in the park. The site is also bordered by two public roads. Project planning must protect existing views from inappropriate intrusions.

Sustainability. The park owns a number of historic and non-historic buildings for which there is no feasible operational or visitor services use, and which are a drain on the park budget. Alternatives must consider the feasible future of these structures.

Regulatory, Management, and Legislative Concerns

Leasing the P.C. Knox House would not require any changes to existing legislation or management policies. References to federal and state regulations and guidelines related to this project, as well as the applicable NPS guidelines and Director's Orders, are provided below with the descriptions of impact topics.

IMPACT TOPICS

Impact topics are resources of concern that could be affected, either beneficially or adversely, by the alternatives presented in this EA/AOE. They were identified based on the issues raised during scoping, site conditions, federal laws, regulations, and Executive Orders, *NPS Management Policies 2006* (NPS 2006) and Director's Orders, and staff knowledge of the park's resources.

Impact Topics Analyzed in this EA/AOE

Impact topics identified and analyzed in this EA/AOE include soil, topography, soundscape, lightscape, visual resources, historic structures, cultural landscapes, visitor use and experience, traffic and circulation, and park operations. A brief rationale for the selection of each impact topic is provided below, and each impact topic is further discussed in detail in "Chapter 3: Affected Environment" of this document.

Natural Resources

Soil

NPS policy is to protect the abundance and diversity of all naturally occurring communities. The *NPS Management Policies 2006* (NPS 2006), NPS DO #77: *Natural Resources Management*, and other NPS and Valley Forge NHP policies provide general direction for the protection of soils. The immediate

project site comprises Conestoga silt loam, 3 to 8 percent slopes; Conestoga silt loam, 8 to 15 percent slopes, and Lindside silt loam soil types. The soil is moderately permeable, has moderate available moisture capacity, is productive, and capable of supporting physical development. Because the proposed action introduces a new gravel parking lot to this soil, with the potential for erosion if unmitigated, soil is analyzed as an impact topic.

Topography

NPS policy is to protect the abundance and diversity of all naturally occurring communities. The *NPS Management Policies 2006* (NPS 2006), NPS DO #77: *Natural Resource Protection*, and other NPS and Valley Forge NHP policies provide general direction for the protection of topography. The project area is rolling, and the area proposed for the parking lot is sloped. The highest elevation is 152 feet, which is where the proposed access lane will reach Library Lane. The lowest elevation is approximately 104 feet, which is located near the reflecting pond at the rear of the house. The only topography affected would be at the area around the site of the proposed parking lot, which slopes from 154 to 146 feet. The slope is approximately 6%, and the proposed action includes construction that could include cut or fill activities to alter current topography. Because proposed actions may alter existing conditions, topography is analyzed as an impact topic.

Soundscape

As described in *NPS Management Policies 2006* (NPS 2006) and NPS DO #47: *Sound Preservation and Noise Management*, preservation of natural soundscapes associated with national parks is an important part of the NPS mission. Natural soundscapes exist in the absence of human-caused sound. As defined, natural soundscapes do not exist at the project site or at any location within Valley Forge NHP. The project site is immediately bounded by grassy meadows maintained by Valley Forge NHP staff, and the most commonly heard human-caused sounds from these locations are associated with lawn mowing. The area beyond the project site is bounded by Wilson Road, Yellow Springs Road, and the Pennsylvania Turnpike, and the most commonly heard human-caused sounds are vehicular traffic. The sound from the turnpike, audible at the project site, is continual. Although no natural soundscape is present, the area is relatively quiet in the context of the region, and the quiet is an important value for visitors. The park makes an effort to minimize the impact of human-caused sounds, where possible. Any construction associated with the proposed action could result in additional, dissonant sounds, but such sounds would be temporary. The use of the site for events will increase the sound from activity and from traffic. Therefore, soundscape is analyzed as an impact topic.

Lightscape

In accordance with *NPS Management Policies 2006* (NPS 2006), the NPS strives to preserve natural ambient lightscapes, which are natural resources and values that exist in the absence of human-caused light. Valley Forge NHP closes at dark. No natural lightscapes are present in the park, but the project site is relatively dark in the context of the region. Many events at the P.C. Knox grounds are expected to last beyond sundown and will require artificial light from within and also around the P.C. Knox house. Therefore, the impact topic of lightscapes is addressed.

Visual Resources

NPS Management Policies 2006 (NPS 2006) notes that the enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks. The Organic Act also states that units of the National Park System are charged with conserving park scenery, along with all the natural and cultural resources which contribute to important views. In the evaluation of visual resources, both the visual character of the site and the quality of the viewshed are analyzed. A viewshed comprises the limits of the visual environment associated with the proposed action, including the viewsheds within, into, and out of the site. The project is within the viewsheds of Yellow Springs Road, Wilson Road, Library Lane, and the Knox Trail. The proposed action includes construction of a gravel parking lot and seasonal changes to the cultural landscape and may alter views within and into the site. Therefore, the impact topic of visual resources is addressed.

Cultural Resources

The NHPA, NEPA, NPS DO #12 and NPS DO # 28: *Cultural Resource Management Guidelines* require consideration of impacts to cultural resources either listed on or eligible for listing on the National Register of Historic Places. This EA/AOE will also assess the effects under Section 106 on historic structures and cultural landscapes.

Historic Structures

A historic structure is defined by the NPS as “a constructed work, usually immovable by nature or design, consciously created to serve some human act” (DO #28). In order for a structure or building to be listed on or eligible for listing on the National Register of Historic Places, it must possess historic integrity of those features necessary to convey its significance, particularly with respect to location, setting, design, feeling, association, workmanship, and materials. The National Register Bulletin #15: *How to Apply the National Register Criteria for Evaluation* (NPS 1990) provides a comprehensive discussion of these characteristics. The P.C. Knox House and outbuildings have integrity and contribute to the National Register significance of Valley Forge NHP (NPS 1988). Because the house may undergo temporary and removable modifications to accommodate safety and accessibility, the impact topic of historic structures is analyzed.

Cultural Landscapes

A cultural landscape is “a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values” (DO #28). Cultural landscapes are expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures that are built.

The larger Valley Forge Farms landscape represents several layers of landscape history. The current landscape overwhelmingly reflects its 19th- and 20th-century agricultural and gentleman’s estate-development heritage. Through the broad expanses of rolling fields, hedgerows, residential clusters of farm and estate buildings, remains of ornamental gardens and private recreational features such as a swimming pond and grass tennis court.

The landscape also shows evidence of its transportation history including the 19th-century covered bridge over Valley Creek and road traces, including a ford site, that likely were used by the Continental Army. The Pennsylvania Turnpike forms the southern boundary of the park and traffic there is visible during the six months of the year when the trees are bare. Traffic sound always is present.

The project site is significant for its association with Philander Chase Knox, who held cabinet positions in three presidential administrations and twice served as a U.S. senator for Pennsylvania, while maintaining his primary residence here. The site retains a high degree of integrity to its 20th-century period of significance; a moderate degree of integrity to its 19th-century period of significance; and relatively little integrity to the encampment period.

The house and grounds were not designed to accommodate modern accessibility requirements, and there are some areas within the project site that may present a safety concern. Accessibility and safety concerns may temporarily alter the cultural landscape of the site. Accessibility and safety requirements and measures to protect the cultural landscape will be detailed in the terms of the lease.

Because the site may undergo temporary and removable modifications to accommodate safety and accessibility, and because a parking lot is proposed, the impact topic of cultural landscapes is analyzed (CLI 2000).

Traffic and Circulation

Library Lane and Wilson Road, which would serve events, extend to Yellow Springs Road, a state highway. Yellow Springs Road feeds into a one-lane covered bridge leading to Highway 252. The proposed project will add to the volume of traffic and also raises concerns for safe ingress and egress to the site. Therefore, the impact topic of traffic is analyzed.

Visitor Use

Enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks (NPS 2006). The NPS strives to provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the natural and cultural resources found in parks. A small portion of the project site is currently used as the park library, with visitor access by appointment only. In rare circumstances, library access, which occurs only on weekdays, could be curtailed by events under the proposed lease. Additionally, the general area is the nexus for several trails: an informal trail leading from the Chesterbrook neighborhood; a connection on Wilson Road to the future Chester Valley Trail; Valley Creek Trail; Mount Misery Trail; and the Knox Trail, which runs through the P.C. Knox grounds and connects with Library Lane to meet the Mount Misery Trail across Yellow Springs Road. Valley Creek is a popular area for fishing and wildlife watching. Preservation of the recreational values of the site is a concern, and the impact topic of visitor use and enjoyment is analyzed.

Park Operations

Three rooms of the P.C. Knox House are used as the park library, which is available by appointment only. Two additional rooms are used for curatorial storage. Two rooms are used for occasional meetings by park staff and partners. Law enforcement rangers perform security checks of the property. Maintenance staff service the property as needed, including occasional lawn mowing and repair of normal wear and

tear. Future unfunded projects include replacement of the heating system and rehabilitation of the reflecting pond. The proposed action would result in a change of park operations at the project site and would provide funding for needed rehabilitation. Therefore, the impact topic of park operations is analyzed.

Impact Topics Dismissed from Further Analysis

The following impact topics were initially considered but were dismissed from further analysis because the resource is not present on the project site or because any potential impacts would be negligible. They include air quality, vegetation, wildlife and wildlife habitat, surface and ground waters, wetlands, floodplains, prime farmlands, archaeological resources, museum objects, ethnographic resources, energy requirements and conservation potential, Indian Trust resources, and environmental justice. A brief rationale for the dismissal of each impact topic is provided below.

Natural Resources

Air Quality

The 1963 Clean Air Act (CAA), as amended, requires land managers to protect air quality. Section 118 of the CAA further requires parks to meet all federal, state, and local air pollution standards, and NPS Management Policies 2006 (NPS 2006) identify the need to analyze potential impacts to air quality during park planning. Located within Chester and Montgomery counties, Valley Forge NHP sits within the Environmental Protection Agency's Philadelphia-Wilmington-Trenton Severe Ozone Non-attainment Area. The proximity of the Pennsylvania Turnpike and other public roads in the project site vicinity contribute to existing air quality conditions. While the proposed use will bring additional traffic and emissions to the project site, there would be no increase to traffic and emissions in the region. Therefore, the topic of air quality is dismissed.

Vegetation

NPS policy is to protect the natural abundance and diversity of all naturally occurring communities. *NPS Management Policies 2006* (NPS 2006), NPS DO #77: *Natural Resources Protection* and other NPS and Valley Forge NHP policies provide general direction for the protection of vegetation. Although vegetation within Valley Forge NHP is a mix of different forest communities, grassland, and wetland areas, the project site contains managed vegetation including mowed lawn and meadow and planted ornamental trees. Because there is little or no native vegetation in the project site and because loss of vegetation due to the construction of the gravel parking lot is limited to lawn grass and trees in poor condition, vegetation is dismissed as an impact topic.

Wildlife and Wildlife Habitat

NPS policy is to protect the natural abundance and diversity of all naturally occurring communities. The *NPS Management Policies 2006* (NPS 2006), NPS DO #77: *Natural Resource Protection* and other NPS and Valley Forge NHP policies provide general direction for the protection of wildlife and wildlife habitat. Although wildlife and wildlife habitat at Valley Forge NHP encompasses an abundance of species, the project site comprises a managed landscape and does not support unique or important wildlife or provide important wildlife habitat. Some displacement of wildlife is likely to occur due to increased human presence on the site; however, this will affect primarily common wildlife species that

are abundant within the park and is considered negligible. Therefore, wildlife and wildlife habitat is dismissed as an impact topic.

Surface and Ground Waters

NPS Management Policies 2006 (NPS 2006), NPS DO #77: *Natural Resource Management*, and the Clean Water Act and other federal, state, and local regulations provide general direction on surface and ground waters. There are no perennial or intermittent streams, wetlands, or springs within the project site. Valley Creek is the closest stream and is located approximately 600 feet from the proposed gravel parking area. The proposed project will not result in a net increase in water volume, rate or pollutant loads, nor will it modify the overall hydrologic pattern. Therefore, the impact topic of surface and ground waters was dismissed.

Proposals to manage and mitigate stormwater are presented in Chapter 2: Alternatives.

Wetlands

Executive Order 11990, "Protection of Wetlands," and NPS DO #77-1: *Wetland Protection* defines the NPS goal to maintain and preserve wetland areas. Valley Forge NHP protects approximately 70 acres of wetland area within park boundaries. There are no wetlands located within the project site or sub-watershed. The closest wetland area is at the foot of the Covered Bridge along Valley Creek, approximately 700' from the project site. Because the project will not generate stormwater that would reach the wetland or cause any other impacts to the wetland, the impact topic of wetlands was dismissed.

Floodplains

Executive Order 11988, "Floodplain Management," and NPS DO #77-2: *Floodplain Management* requires an examination of impacts to floodplains and potential risk involved in placing facilities within floodplains. The project site is located outside the 100-year floodplain associated with Valley Creek. Therefore, the impact topic of floodplains was dismissed.

Prime Farmlands

Prime farmland is one of several designations made by the U.S. Department of Agriculture to identify important farmlands in the United States. Prime farmland is important because it contributes to the nation's short- and long-range needs for food and fiber. In general, prime farmland has an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, an acceptable level of acidity or alkalinity, an acceptable content of salt or sodium, few to no rocks, and permeable soils (designated as prime farmland soils). Urban and developed areas cannot be considered prime farmland. The Conestoga silt loam, 3 to 8 percent slopes, Conestoga silt loam, 8 to 15 percent slopes, and Lindsides silt loam soil types within the project site are not considered prime farmland soils. Additionally the project site is not managed as farmland and has been developed. The proposal would result in a minor change in the amount of development on the project site and would not increase the acreage of prime farmland soil that is developed or used for non-agricultural purposes. Therefore, the impact topic of prime farmland was dismissed.

Cultural Resources

Archeological Resources

The NPS defines an archeological resource as any material remains or physical evidence of past human life or activities that are part of archeological interest, including the record of the effects of human activities on the environment. Archeological resources are capable of revealing scientific or humanistic information through archeological research (DO #28). Valley Forge NHP as a whole is nationally significant for its known archeological resources and its potential to yield important information about historic periods already evident in the park. Known archeological resources associated with prehistory are significant at the state and local levels. The only expected area of ground disturbance is the proposed parking lot and the access lane. Because the project site is potentially archeologically sensitive, a Phase I shovel test survey of the proposed parking lot in the area of the former garden was conducted. The survey comprised 54 shovel test pits (STPs) excavated at a 7.5 m (25 ft) interval, of which one was not excavated since it was within three meters of another STP. Forty-two artifacts were recovered from 22 STPs, including eight prehistoric lithics. The prehistoric assemblage consisted entirely of lithic debitage and did not include any temporally diagnostic artifacts or cultural features. The site constitutes a low density scatter that is unlikely to add to our understanding of local or regional prehistory. It is, therefore, not eligible for listing on the National Register of Historic Places. The historic assemblage was consistent with a general artifact scatter related to the area's agricultural and recreational use over the past 150 years, and does not constitute a site. No additional archaeological work is recommended. Because no significant archeological resources are present, the impact topic of archeological resources was dismissed.

Museum Objects

The NPS defines a museum object as “a material thing possessing functional, aesthetic, cultural, symbolic, and/or scientific value, usually movable by nature or design. Museum objects include prehistoric and historic objects, artifacts, works of art, archival material, and natural history specimens that are part of a museum collection” (DO #28). The Horace Willcox Memorial Library is managed by the park's curatorial staff and contains approximately 7,000 volumes including books, reports, theses, dissertations, and periodicals related to the Valley Forge Encampment and the American Revolution. There are 750 rare books that are curated and housed in the park library. In addition, historic furnishings are stored in the house. No museum objects are included or would be affected by the proposed project. All library and museum storage areas are secured and access to the library is granted by appointment only. An event at the P.C. Knox House would pose no impacts to the museum objects. Therefore, the impact topic of museum objects was dismissed.

Ethnographic Resources

An ethnographic resource is defined as any “site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it” (DO #28). Ethnographic resources eligible for listing on the National Register are traditional cultural properties. No sites, structures, or objects within Valley Forge NHP have been identified as either ethnographic resources or traditional cultural properties. Therefore, the impact topic of ethnographic resources was dismissed. In the unlikely event that human remains,

funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001) would be followed. See Appendix B for correspondence with those American Indian tribes with historic ties to Valley Forge NHP.

Indian Trust Resources

Secretarial Order 3175 requires that any anticipated impacts to Indian Trust resources from a proposed project or action by U.S. Department of the Interior agencies be explicitly addressed in environmental documents. The federal Indian Trust responsibility is a legally enforceable obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal laws with respect to American Indian tribes. There are no known Indian Trust resources in Valley Forge NHP, and the lands comprising the park are not held in trust by the Secretary of the Interior for the benefit of Native Americans due to their status as Native Americans. Therefore, the impact topic of Indian Trust resources was dismissed.

Energy Requirements and Conservation Potential

The Council on Environmental Quality (CEQ) guidelines for implementing NEPA requires examination of energy requirements and conservation potential as a possible impact topic in environmental documents. Valley Forge NHP strives to incorporate the principles of sustainable design and development into all facilities and park operations. The objectives of sustainability are to design structures to minimize adverse impact on natural and cultural values; to reflect their environmental setting; to maintain and encourage biodiversity; to construct and retrofit facilities using energy efficient materials and building techniques; to operate and maintain facilities to promote their sustainability; and to illustrate and promote conservation principles and practices through sustainable design and ecologically sensitive use. Essentially, sustainability is living within the environment with the least impact on the environment. The proposed action subscribes to and supports the practice of sustainable planning and design in part by addressing underutilized buildings and constructing a non-permanent gravel parking lot. Any adverse impacts relating to energy use availability, or conservation would be negligible. Therefore, the impact topic of energy requirements and conservation potential is dismissed.

Environmental Justice

Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. According to the EPA, environmental justice is the "...fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental law, regulations, and policies. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies."

The goal of “fair treatment” is not to shift risks among populations, but to identify potentially disproportionately high and adverse effects and identify alternatives that may mitigate these impacts. The communities surrounding Valley Forge NHP contain both a minority and low-income population; however, environmental justice is dismissed as an impact topic for the following reasons:

- The park staff solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.
- Implementation of the proposed action would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse impacts on any minority or low-income population.
- The impacts associated with implementation of the proposed action would not disproportionately affect any minority or low-income population or community.
- Implementation of the proposed action would not result in any identified effects that would be specific to any minority or low-income community.
- Any impacts to the socioeconomic environment resulting from implementation of the proposed action are negligible to minor in intensity, lasting only as long as construction. In addition, the park staff and planning team do not anticipate the impacts on the socioeconomic environment to appreciably alter the physical and social structure of the nearby communities.