

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

**FINDING OF NO SIGNIFICANT IMPACT**

**Final Disposition of the Gettysburg Cyclorama Building  
Environmental Assessment  
Gettysburg National Military Park  
Pennsylvania**

**INTRODUCTION**

As part of its long-term plan to rehabilitate the North Cemetery Ridge to its historic 1863 battle and 1864-1938 commemorative-era appearance, the National Park Service (NPS) is proposing to demolish the Gettysburg Cyclorama building in Gettysburg National Military Park (the park). The NPS' decision to demolish the Cyclorama building was addressed in the *Gettysburg National Military Park General Management Plan/Environmental Impact Statement* (GMP/EIS) and approved in a 1999 Record of Decision (ROD). Demolition of the Cyclorama building was also addressed in the 1999 Memorandum of Agreement (MOA) entered into by the NPS, the Pennsylvania State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP). In 2006, the NPS was sued by the Recent Past Preservation Network and two individuals challenging the government's compliance with both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) over the decision to demolish the Cyclorama building. While the NPS was found to have complied with the NHPA, in March 2010, the United States District Court directed the NPS to undertake a "site-specific environmental analysis on the demolition of the Cyclorama Center" and to consider "non-demolition alternatives" to its demolition before "any implementing action is taken on the Center." Accordingly, the NPS initiated an environmental assessment (EA).

The purpose of the NPS action is to continue to rehabilitate the landscape of the North Cemetery Ridge to its 1863 battle and 1864-1938 commemorative-era appearance in accordance with the decision in the 1999 GMP by removing the Gettysburg Cyclorama building from the North Cemetery Ridge landscape. Once this intrusion (Structure) is removed, the NPS will rehabilitate important historic 1863 battle and commemorative-era landscape features according to the treatment recommendations contained in the 2004 cultural landscape report (CLR) for the North Cemetery Ridge Area.

As provided for in its enabling legislation and related documents, the mission of Gettysburg National Military Park is to preserve and protect the resources associated with the Battle of Gettysburg and the Soldier's National Cemetery, and to provide an understanding of the events that occurred here, within the context of American history. In the 1999 GMP, the NPS identified three landscapes and their associated resources as nationally significant: the historic field of the Battle of Gettysburg (1863); the Soldiers' National Cemetery (1863-1927); and the commemoration of the battle by its veterans (1864-1938). The Cyclorama building, built between 1959 and 1962, is located on some of the Battle of Gettysburg's most historically significant land along North Cemetery Ridge. Action is needed at this time to improve visitor knowledge of the major battle action and the commemoration that took place on the ridge between 1863 and 1938 by rehabilitating the landscape in accordance with the decisions made in the GMP and approved ROD and the treatment recommendations in the 2004 CLR.

The EA evaluated three alternatives: a no-action alternative and two action alternatives: Demolition of the Cyclorama Building, identified as the NPS Preferred Alternative, and Relocation of the Cyclorama Building Outside the Park by a Non-NPS Entity. The EA also analyzed the potential impacts these alternatives would have on the natural, cultural, and human environment. The EA was prepared in accordance with NEPA; regulations of the Council on Environmental Quality (CEQ) (40 CFR 1500-1508.9); and NPS Director's Order (DO) 12: *Conservation Planning, Environmental Impact Analysis, and Decision-Making* and accompanying DO-12 Handbook. Compliance with Section 106 of the NHPA was completed separately from this process but was taken into account in the preparation of the EA.

## **NPS SELECTED ALTERNATIVE**

Based on the analysis presented in the EA, the NPS has selected Alternative B: Demolition of the Cyclorama Building for implementation. The selected alternative is described on pages 31-35 of the EA. A graphic illustrating this alternative is available on page 33 of the EA. Implementation of the items summarized below and described in the EA will meet the purpose of and need for action because it will demolish the Cyclorama building, allowing for the rehabilitation of the landscape of the North Cemetery Ridge to its 1863 battle and 1864-1938 commemorative-era appearance in accordance with the decision in the 1999 approved GMP. Subsequently, this alternative will rehabilitate important historic battle and commemorative-era landscape features according to the treatment recommendations contained in the 2004 CLR for the North Cemetery Ridge area.

**Demolish the Cyclorama Building.** The selected alternative will include the demolition of the Cyclorama building. The above-grade portions of the Cyclorama building foundation will be completely demolished, and the debris will be removed. Heavy equipment will be used to break the structure into parts. These parts will then be placed in dumpsters and hauled to an approved landfill or recycling facility. Demolition activities will impact a total of 3.9 acres outside the footprint of the building.

Architectural features from the building will not be retained for inclusion in the park's museum collections, as set forth in the park's Scope of Collections. These features have been made available to various groups, and no one has offered to accept them. As required by the 1999 MOA, internal and external features have been documented. Interpretation of the building, including its original interior and use, and information about Neutra and his role in Mission 66, will continue to be provided in existing interpretive information at the park museum and visitor center.

The park will retain responsibility for maintenance or removal of sewer and water lines. The NPS will implement a landscape maintenance plan for the rehabilitated landscape of North Cemetery Ridge. The commemorative areas, including Ziegler's Grove, will continue to be mown as often as necessary to maintain a grass height of 2½ to 3 inches. Fields east and south of Ziegler's Grove will be maintained with meadow grasses.

As much of the building debris as possible will be recycled. The contractor will conduct an initial survey of items that could be recycled and a plan for the treatment of those items will be developed. The items will be removed first, before any demolition is initiated, and transported off-site to an appropriate recycling facility.

**Remove All Sidewalks and Designed Landscaping Associated with the Building.** Site specific rehabilitation of elements of the 1999 GMP and the CLR will continue to be implemented in the general area. These actions will include removal of walkways to and surrounding the Cyclorama building, as well as removal of ornamental plantings and screening undertaken during the 1960s and 1980s.

**Reconfigure the Existing Cyclorama Building Parking Lot to Rehabilitate Ziegler's Ravine.** The Cyclorama building parking lot will be reconfigured to continue to provide parking for the Soldiers' National Cemetery. Approximately half of the area of the existing parking lot will be removed, allowing for restoration of battle-era topography in this area of Ziegler's Ravine. The reconfigured lot will provide 57 parking spaces for cars, four parking spaces for buses, and a bus stop for the park and Gettysburg Borough shuttle bus, known as the Freedom Transit. This reconfigured lot will allow for the rehabilitation of the historic Ziegler's Ravine and other topographic features important to the 1863 battle and to commemorative circulation systems on North Cemetery Ridge. In addition, reconfiguration of the existing parking lot will permit the restoration or relocation of the 1st Massachusetts Sharpshooters, 88th and 90th Pennsylvania, and 12th Massachusetts monuments to their commemorative-era locations.

**Partially Rehabilitate Historic Grades of Ziegler's Ravine by Regrading a 350-foot Section of Roadway to Follow the Battle Era Topography of Ziegler's Ravine.** A 350-foot section of Hancock Avenue will be regraded as it passes through Ziegler's Ravine to reveal the ravine topography of the Battle Era. The construction of the Cyclorama building entrance road and parking lot created areas of fill approximately 5 feet deep, which have obscured the terrain of the Battle Era. The roadway will be substantially regraded to reflect the historic ravine area, a change in grade of about 4 feet. A culvert will be installed underneath Hancock Avenue as part of the rehabilitation of the ravine. Erosion and sediment control and best management practices will be used at locations where soils are temporarily disturbed as a part of the culvert installation.

**Rebuild the 1863 Historic Fencing within the Study Area.** One of the most important components of the site treatment will be the reconstruction of missing historic fences that defined the Battle Era fields and were an integral part of the formerly agricultural landscape. Some historic fences remain at the southern portion of the site, and these will be preserved and maintained in their Battle Era appearance. Others among them retained their historic alignment, but their appearance has been altered over time. These fencelines will be rehabilitated to reflect their original Battle Era configuration and material. The majority of the historic fencelines are missing, however, and these fences will be reconstructed to the fullest extent known and possible to reflect their Battle Era locations and appearance. A few breaks in the fencelines will be proposed to accommodate the modern needs of vehicular roadways and pedestrian crossings. Specific fence recommendations can be found in appendix C of the EA.

**Rehabilitate the Historic Grades of Cemetery Ridge in the Footprint and Immediate Vicinity of the Cyclorama Building.** Grading is recommended in the vicinity of the Cyclorama building. After removal of the building, the grades around the footprint of the building, as well as areas just to the north and east of the building, will be rehabilitated to the fullest extent possible to match the historic terrain of Cemetery Ridge. These grading changes will be a primary method of rehabilitating and revealing the terrain of the Battle Era.

**Rebuild the Commemorative-era Sidewalk that was Displaced by the Cyclorama Building.** The commemorative-era sidewalk will be rebuilt following the historic alignment through Ziegler's Grove and Ziegler's Large Meadow. The recommended path material is asphalt.

**Relocate Monuments Displaced by the Cyclorama Building to their Historic Footprint.** Some of the park's existing monuments have been relocated over time. With the removal of a portion of the Cyclorama building parking lot, monuments will be restored to their original commemorative-era locations. Each monument and marker within and/or directly adjacent to the demolition area will be assessed for potential activities that could potentially damage it. In addition, those monuments and markers that will require subsequent relocation to their historic commemorative-era sites will also be assessed to assure any intervention by the park will not damage them. A secure storage facility will be designated within the park. Monuments will be fully photo-documented before any movement is undertaken, as well as during the removal and relocation processes. In particular, the 90th Pennsylvania Infantry Monument, the 1st Massachusetts Sharpshooters Position, the 12th Massachusetts Position Marker, and the 88th Pennsylvania Infantry Position will be relocated to their historic commemorative-era positions. In addition, the Cyclorama building sits on the historic 1863 site of the battle position and the commemorative-era location of monuments and cannon of the Battery F, 5th U.S. Artillery, so removal of the building will allow for this monument group to be returned to its original commemorative-era location. Specific monument treatments can be found in appendix C of the EA.

## **OTHER ALTERNATIVES CONSIDERED**

Two other alternatives were considered in the EA, which were Alternative A: No-action (Mothballing of the Cyclorama Building) and Alternative C: Relocation of the Cyclorama Building Outside the Park by a Non-NPS Entity. These alternatives are summarized below.

### **ALTERNATIVE A: NO-ACTION: MOTHBALLING OF THE CYCLORAMA BUILDING**

The no-action alternative would include the following actions, which are also included in the selected alternative:

- Reconfigure the existing Cyclorama building parking lot in order to rehabilitate Ziegler's Ravine.
- Partially rehabilitate historic grades of Ziegler's Ravine by regrading a 350-foot section of roadway to follow the Battle Era topography of Ziegler's Ravine.
- Rebuild the 1863 historic fencing within the study area.

In addition, the no-action alternative also would include the following actions:

- Mothball the building.
- No visitor use of the building either internally or externally, meaning the ramp to the roof would be closed to public access.
- Remove all sidewalks and designed landscaping associated with the building.

Mothballing of the building would keep the structure essentially as is and would protect it from vandalism and weather. The purpose of mothballing would be to retain the building while minimizing costs associated with its maintenance. The NPS would use the previously prepared HABS documentation for the park (HABS-PA-6709 2005) to prepare a condition assessment that would set priorities for repairs necessary to stabilize the building over the long term. The park would evaluate the age and condition of the building's major elements: foundations, structural systems, exterior materials, roofs and gutters, plumbing, electrical and mechanical systems, special features, and site drainage.

As part of mothballing, the NPS would exterminate or control pests, such as termites and rodents, and seal their access to the interior of the building. The NPS would make general repairs to the building, as noted in the condition assessment, including repairing holes in the drum of the structure to ensure that water, pests, and insects cannot enter. The building also would be secured from vandals and break-ins. Vulnerable entry points would be sealed, and the NPS would update and repair the fire protection and security alarms. The NPS would design and install ventilation louvers that would equalize the effect of heat and moisture on the interior finishes. Painted plywood panels would be properly installed to protect window frames. Any remaining asbestos found in the building would be abated as part of mothballing efforts.

In addition, the park would secure or modify utilities and mechanical systems and manage vegetation that could potentially impact the exterior of the structure. The ponds and other water features would not be rehabilitated. Lastly, the park would develop and implement a monitoring and maintenance plan for the protection of the building. All property associated with the building and the building itself would remain in place until a future decision is made about the disposition of the building and its associated elements.

Under the no-action alternative, the NPS would also periodically check the structure to ensure it is not sustaining any damage from the elements, such as heat and moisture, but would not spend any additional funds to rehabilitate any part of the structure. The park would retain responsibility for maintenance of sewer and water lines. The commemorative areas, including Ziegler's Grove, would continue to be mown as often as necessary to maintain a grass height of 2½ to 3 inches.

As part of the no-action alternative, visitors would be able to view the exterior of the building. There would be no visitor or NPS use of the interior of the building, and there would be no interpretation of the building or interpretive signage other than that currently existing at the park museum and visitor center.

Alternative A was not selected for implementation because it does not meet the purpose and need of the proposed action. The no-action alternative would not remove the Cyclorama building, a modern intrusion on the North Cemetery Ridge landscape, and, therefore, would not allow for the rehabilitation of the landscape of the North Cemetery Ridge to its 1863 battle and 1864-1938 commemorative-era appearance in accordance with the decision in the 1999 approved GMP.

### **ALTERNATIVE C: RELOCATION OF THE CYCLORAMA BUILDING OUTSIDE THE PARK BY A NON-NPS ENTITY**

Alternative C would include the following actions, which are also included in the selected alternative:

- Reconfigure the existing Cyclorama building parking lot in order to rehabilitate Ziegler's Ravine.
- Partially rehabilitate historic grades of Ziegler's Ravine by regrading a 350-foot section of roadway to follow the Battle Era topography of Ziegler's Ravine.
- Rebuild the 1863 historic fencing within the study area.
- Rehabilitate the historic grades of Cemetery Ridge in the footprint and immediate vicinity of the Cyclorama building.
- Rebuild the commemorative-era sidewalk that was displaced by the Cyclorama building.
- Monuments displaced by the Cyclorama building would be replaced in their historic commemorative-era footprint.

The following additional actions would be taken under alternative C:

- Cut Cyclorama building into two or more pieces and remove from the park boundary with the condition that the new location of the building must be completely out of the historic district.
- Remove all sidewalks and designed landscaping associated with the building.

Under alternative C, the Cyclorama building would be relocated to a site outside of the park and the historic district by a non-NPS entity and adaptively reused for commercial or other purposes. Once the building was gone, the landscape on which the building now sits would be rehabilitated and returned to the condition of the historic battle and commemorative-era appearance. Interpretation of the building, including its original interior and use, and information about Neutra and his role in Mission 66 would continue to be provided in existing interpretive information at the park museum and visitor center.

The NPS could work with a partner through a cooperative agreement or advertise through the NPS program for others to accept ownership of, and then move, rehabilitate, and operate the building. The NPS would identify an owner and use that best fits the needs of the local community by working with the Borough of Gettysburg and adjacent townships to find locations outside the Gettysburg Battlefield Historic District, advertising widely for a new owner and use, and thoroughly evaluating potential responses.

During relocation of the Cyclorama building, the handling of its character-defining features would be decided by the new owner. Such features include stair railings, ceramic tile, terrazzo floors, concrete stairs, doors and windows, light fixtures, water fountains, louvers, internal building signage, moveable walls both interior and exterior, thin patterned concrete walls of the drum, other important finishes, and other features defined by the existing HABS report. The level of preservation of these character-defining features would be the responsibility of the new owner.

The new owner would operate and maintain the exterior and if applicable, the interior, of the structure as needed to ensure the long-term preservation and use of the structure. The NPS would be responsible for maintaining or removing the water and sewer lines at the site. The NPS would implement a landscape maintenance plan for the rehabilitated landscape of North Cemetery Ridge. The commemorative areas, including Ziegler's Grove, would continue to be mown according to the stipulations of the CLR.

There are two potential scenarios for moving the Cyclorama building: moving the building in at least two pieces or deconstruction and then reconstruction of the building, which would save important character-defining features of the original structure. It would not be possible to remove the Cyclorama building and relocate the building outside of the park and the historic district in one complete piece, due to the state right-of-way easement and other constraints.

Once the building's final destination is selected, the appropriate move route would be established. Two move corridors have been outlined by the park, depending on the destination of the building. Move Corridor 1, runs northeast from the drum of the building, to the east of a wooded area of the park, part of Ziegler's Grove. It then cuts back west at a diagonal until it intercepts with Steinwehr Avenue. Move Corridor 1 would result in impacts to a total area of 8.4 acres outside of the Cyclorama building footprint. Move Corridor 2, runs slightly north and west from the drum of the Cyclorama building's current position and intercepts Steinwehr Avenue further south than Move Corridor 1. Move Corridor 2 would result in impacts to a total area of 5.6 acres outside of the Cyclorama building footprint.

Alternative C does meet the purpose and need of the proposed action because it would remove the Cyclorama building, a modern intrusion on the North Cemetery Ridge landscape, and, therefore, would rehabilitate the landscape of the North Cemetery Ridge to its 1863 battle and 1864-1938 commemorative-era appearance in accordance with the decision in the 1999 approved GMP. However, alternative C was not selected for implementation because it would result in more adverse impacts on park resources than alternative B, related to the need to construct a Move Corridor for relocation of the Cyclorama building. Further, at no time during this EA process or in any prior planning, including the prior litigation, has an entity come forward with a genuine proposal to move the building off NPS lands. Thus, while the NPS determined that Alternative C met the test of a reasonable alternative and fully developed and analyzed this alternative in good faith, it was not selected primarily because of the continued lack of an interested partner/buyer.

## **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

In accordance with the DO-12 Handbook, the NPS identified the environmentally preferable alternative in its NEPA document for public review and comment [Sect. 4.5 E (9)]. The environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative (43 CFR 46.30).

Of the alternatives evaluated in the EA, the selected alternative best meets the park objectives of protecting and preserving cultural and natural resources by allowing for the complete rehabilitation of the landscape of the 1863 battle at Gettysburg and its Civil War veteran-designed commemoration. Based on the analysis of environmental consequences of each alternative presented in chapter 4 and summarized in table 2 of the EA, the selected alternative is the environmentally preferable alternative. Although the selected alternative will result in short-term impacts to cultural and natural resources throughout the demolition process, demolition of the Cyclorama building will allow for the natural and cultural resources originally disturbed as part of the construction of the Cyclorama building to be rehabilitated to their original state.

## **MITIGATION MEASURES**

To minimize environmental impacts related to the action alternatives, the NPS will implement mitigation measures whenever feasible. Although the exact mitigation measures to be implemented will depend upon the final design and approval of plans by relevant agencies, the following is a list of actions that could take place:

- All protection measures will be clearly stated in the construction specifications, and workers will be instructed to avoid conducting activities beyond the fenced construction zone.
- Fence all construction areas in order to keep related disturbances within an NPS-defined and minimal impact area required for construction.
- Minimize soil erosion by limiting the time that soil is left exposed and by applying other erosion control measures, such as erosion matting, silt fencing, and sedimentation basins in construction areas to reduce erosion, surface scouring, and discharge to water bodies.
- Reseed all areas with native grasses or other NPS approved native vegetation.
- Remove invasive plants from construction areas using approaches prescribed in the NPS Integrated Pest Management Program.
- Implement measures to prevent invasive plants from returning to sites where they have been removed, such as ensuring that construction-related equipment arrives at the site free of mud or seed-bearing materials, and certifying that all seeds and straw material are weed-free.



- Rehabilitate areas that are temporarily disturbed during construction with native grasses and other native species as per NPS standards and consistent with the CLR.
- Implement a dust abatement program. Standard dust abatement measures could include the following elements: water or otherwise stabilize soils, cover haul truck, employ speed limits on unpaved roads, minimize vegetation clearing, and revegetate after construction.
- Retain below-ground portions of the Cyclorama building foundations.
- Document and protect features of the 1863 battle and commemorative landscapes.
- Rehabilitate features of the 1863 battlefield, including their historic grade and topography, and rehabilitate monuments, cannons, and other commemorative features to their historic commemorative-era locations and conditions.
- Immediately implement NHPA Section 106 procedures if and when any unknown significant archeological resources are uncovered during ground-disturbing activities.
- Recycle as much of the building's steel, glass, and concrete as possible.
- Implement a traffic control plan, as warranted. Standard measures include strategies to maintain safe and efficient traffic flow during the construction period.
- Implement measures to reduce the adverse effects of construction on visitor safety and experience.
- Implement an education program to ensure that visitors understand the need and benefits of the action.
- Implement a spill prevention and pollution control program for hazardous materials. Standard measures could include hazardous materials storage and handling procedures; spill containment, cleanup, and reporting procedures; and limitation of refueling and other hazardous activities to non-sensitive sites.
- If lead paint is found, implement a lead abatement plan to protect employees, contractors, and visitors from lead-contaminated materials.
- If asbestos is found, implement an asbestos-abatement plan to protect employees, contractors, and visitors from asbestos-contaminated materials.
- Implement standard noise abatement measures during construction. Standard noise abatement measures could include the following elements: a schedule that minimizes impacts on adjacent noise-sensitive uses, the use of the best available noise control techniques wherever feasible, the use of hydraulically or electrically powered impact tools when feasible, and location of temporary noise sources as far from sensitive uses as possible.

## **WHY THE NPS SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As defined in 40 CFR section 1508.27, significance is determined by examining the following criteria:

- 1) Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS.**

The selected alternative will result in adverse impacts on historic structures, archeological resources, and local roads and park access (temporary); beneficial impacts on cultural landscapes, scenic resources, and park operations and park facilities; both adverse and beneficial impacts on visitor use and experience; and unknown, but potentially beneficial impacts on gateway communities. As described in chapter 4 of the EA, none of these impacts will be significant. On balance, the selected alternative will have a beneficial impact.

**2) The degree to which public health and safety are affected.**

The selected alternative has some risk to public safety during the time that demolition and construction activities are occurring; however, this risk is considered to be very low and will be further minimized during construction/demolition by implementing measures such as fencing and monitoring to block visitor access to the site.

**2) Unique characteristics of the area such as proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains.**

The selected alternative will result in a beneficial impact on cultural landscapes because the demolition of the Cyclorama building will allow the rehabilitation of important features of the 1863 battle landscape that affected the outcome of the battle, such as topographic relief and cover vegetation, as well as the return of features and unique memorials associated with the 1864-1938 commemorative-era landscape to their original location.

The Cyclorama building is a National-Register eligible historic structure. In the 1998 Determination of Eligibility signed by the Keeper of the National Register, the Keeper noted “the Cyclorama building is rare example of Neutra’s institutional design on the east coast and one of his very few Federal commissions.” However, although the building is a representative example of Richard Neutra’s work and the Mission 66 period, it is not considered a unique representation. Other existing representative examples of the Mission 66 period include the Quarry Visitor Center at Dinosaur National Monument, the Wright Brothers National Memorial Visitor Center, the Beaver Meadows Visitor Center, and the Painted Desert Community at Petrified Forest National Park, which is also a Mission 66 design of Richard Neutra. Therefore, while demolition of the Cyclorama building will result in an adverse effect under Section 106 of the NHPA, the SHPO concurred in a letter dated September 10, 2010 that “demolition in order to return the area to its appearance at the time of the battle is the best alternative.”

Demolition of the Cyclorama building has the potential to adversely impact archeological resources within and adjacent to the building, although archeological resources are least likely to be encountered near the building because this area was highly disturbed as part of the excavation for the construction of the building.. Should archeological resources be encountered, the NPS will take appropriate steps to avoid, minimize, or mitigate any adverse effects to the resources.

No wetlands, wild and scenic rivers, or ecologically critical areas have been identified within the project area. The study area is outside both the 100- and 500-year floodplain.

**4) The degree to which impacts are likely to be highly controversial.**

There is no controversy over the effects of the selected alternative. There is long-standing public disagreement over removal of the building. Of the public comments received during scoping and review of the EA, many people and organizations voiced support for removal of the building in order to rehabilitate and interpret the battle and commemorative landscape. This was also reflected in the Section 106 consultation for the 1999 GMP when the ACHP found that “The restoration of this key battlefield site so that the battlefield can properly be interpreted must be regarded as a historic mission of the highest order”, as well as a September 2010 letter from the SHPO noting that although “demolition [of the Cyclorama building] was determined to be an adverse effect... there was no other feasible alternative... demolition of the Cyclorama building in order to return the area to its appearance at the time of the battle is the best alternative.” However, some members of the public oppose removal because of the importance of the building and its designer in 20<sup>th</sup>-century architectural history and contend that the building is, itself, a commemorative feature of the park by design of the NPS in the context of Mission 66. However, as explained in the EA and this FONSI, while the NPS recognizes the importance of the building and Richard Neutra, the building does not support the park’s mission, purpose and significance, as determined through the GMP planning process and 2004 National Register documentation which identified three landscapes and their associated resources in the 1999 GMP as nationally significant: the historic field of the Battle of Gettysburg (1863); the Soldiers’ National Cemetery (1863-1927); and the commemoration of the battle by its veterans (1864-1938). The Cyclorama building, built between 1959 and 1962, lies outside these dates of significance. Further, the building is located on some of the Battle of Gettysburg’s most historically significant land along North Cemetery Ridge and its construction displaced veteran-placed monuments and other important features of the historic battle and commemorative-era landscapes. Thus, while the NPS acknowledges the views expressed by members of the public that the building should be retained for its own importance, the removal of the building best meets the park’s mission, purpose and significance because it allows for the rehabilitation and interpretation of the nationally significant 1863 battle and 1864-1938 commemorative-era landscapes.

**5) The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.**

No highly uncertain, unique, or unknown risks were identified during preparation of the EA or during the public review period.

**6) Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.**

The selected alternative neither establishes precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

**7) Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects.**

As described in chapter 4 of the EA, cumulative impacts were analyzed by combining the impacts of the selected alternative with the impacts of six other projects that were identified as contributing to cumulative impacts on the resources addressed by the EA: construction of the new park museum and visitor center, demolition of the old visitor center building and restoration of historic 1863 battle and commemorative-era landscape features, removal of the parking lot formerly associated with the old visitor center building, rehabilitation of cultural landscapes and historic structures, ongoing removal of non-contributing residential and commercial development, and development of U.S. Route 30 East and various commercial development. The beneficial and adverse impacts of these other past, present, and reasonably foreseeable future actions on resources, in conjunction with the impacts of the selected alternative, will result in both beneficial and adverse cumulative impacts; however, the overall cumulative impacts are not significant.

**8) The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.**

As described on pages 73-74 of the EA, the selected alternative will result in an adverse effect on historic resources because the Cyclorama building, a National-Register eligible historic structure, will be demolished. However, in a letter dated September 10, 2010, the SHPO noted that although "demolition [of the Cyclorama building] was determined to be an adverse effect... there was no other feasible alternative... demolition of the Cyclorama building in order to return the area to its appearance at the time of the battle is the best alternative." This was also reflected in the Section 106 consultation for the 1999 GMP when the ACHP found that "The restoration of this key battlefield site so that the battlefield can properly be interpreted must be regarded as a historic mission of the highest order." Recordation of the structure and other mitigation measures stipulated in the MOA between the NPS, the Pennsylvania SHPO, and the ACHP, dated July 1999, have been completed.

As described on pages 78-80 of the EA, the selected alternative will result in a beneficial impact on cultural landscapes by allowing for the restoration of many features that affected the outcome of the battle such as topographic relief and cover (vegetation) used during the battle. In addition, features and memorials associated with the commemorative period, which were moved to accommodate construction and use of the Cyclorama building, will be returned to their original location. As mentioned above, the SHPO stated that the selected alternative is the best alternative to "return the area to its appearance at the time of the battle."

As described on pages 82-83 of the EA, the selected alternative will result in adverse impacts on archeological resources because activities related to the demolition of the Cyclorama building has the potential to impact archeological resources within and adjacent to the building. The area of potential impact includes an approximately 2-acre area where supplies and vehicles will be transported between the building site and the parking lot. Archeological resources are least likely to be encountered in the immediate building area due to previous construction/ground disturbance. Demolition and transport activities could also impact sites of historic fencing and stone walls, particularly along the boundaries of the fields of Peter Frey and David Ziegler.

Ground-disturbing activities will be preceded by archeological investigations to ensure that there are no significant archeological resources that could be impacted by the work. Should archeological resources be encountered, the NPS will take appropriate steps to avoid, minimize, or mitigate any adverse effects to the resources.

As described on pages 87-88 of the EA, the selected alternative will result in beneficial impacts on scenic resources because demolition of the Cyclorama building will allow for full rehabilitation on the site of the landscapes of the 1863 battle and the commemorative eras. Prominent commemorative monuments and markers will no longer be overshadowed by mass and height of the Cyclorama building and will once again be viewed as the veterans of the battle had intended them to be viewed. Many monuments placed by veterans on the battlefield that were displaced by construction of the Cyclorama building will be returned to their original locations.

**9) The degree to which an action may adversely affect an endangered or threatened species or its habitat.**

Based on a review of U.S. Fish and Wildlife Service (USFWS) federally listed species, there are no federally listed species under their jurisdiction that are known or are likely to occur in the study area. Based on a review by the Commonwealth of Pennsylvania's Division of Conservation and Natural Resources, no impact is anticipated to state-listed species or resources of concern located in the vicinity of the project.

**10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.**

The selected alternative violates no federal, state, or local environmental protection laws.

## **AGENCY AND PUBLIC INVOLVEMENT**

The planning process for the proposed action was initiated during the internal, agency, and public scoping efforts, which began in the summer of 2010. This process introduced agencies and the public to the purpose and need of the project and potential actions that could be included with the disposition of the Gettysburg Cyclorama building.

An internal scoping meeting was held on August 11, 2010 to begin discussions on impact topics and alternatives. The park also established a public scoping timeline at the meeting to ensure public participation at the necessary points throughout the project.

Public scoping for this EA began with a press release, which was sent out to news organizations, community partners, historic preservation and civil war organizations, and others in July of 2010, stating the park's intentions to begin the EA process for the Cyclorama building. The official public scoping period began on August 24, 2010 and concluded October 1, 2010. During this

time, public comments were accepted on the NPS Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/gett>) and by mail. The park received 1,935 pieces of correspondence from the public. The majority of comments included suggestions for planning issues, alternatives, and important impacts to be considered in the EA. In late August 2010, an article about the EA was published in the park newsletter and a second press release was published, which included an invitation to the public to attend two public scoping meetings. Paid advertisements and a radio interview also were used to inform the public about the upcoming meetings. Public scoping meetings were conducted by park staff on September 16 and 17, 2010. The meetings presented information about the planning process and the range of alternatives proposed and solicited input from the public about the purpose, need, objectives, and any other topics of concern.

Agency scoping for this project began in July 2010. Scoping letters were sent out to various agencies requesting feedback on the proposed project and alternatives. Copies of these letters and responses from the agencies, if applicable, are included in appendix A of the EA. Agencies contacted included the Pennsylvania Department of Conservation and Natural Resources, USFWS, the ACHP, and the SHPO. The Pennsylvania Department of Conservation and Natural Resources replied that according to the information provided, the proposed action is not anticipated to impact species or resources of concern in the vicinity of the project. The USFWS replied that no federally listed species under its jurisdiction are known or are likely to occur in the study area. The SHPO determined that although the demolition will result in an adverse effect, demolition in order to return the area to its appearance at the time of the battle is the best alternative. The ACHP and the SHPO executed an MOA in July of 1999 for demolition of the Cyclorama building, and the NPS completed all required mitigation. The MOA can be found in appendix B of the EA. The park also initiated coordination with the Delaware Tribe of Indians and the Delaware Nation. No responses were received from the tribes.

In addition to the agency and public scoping efforts outlined above, the park conducted a survey in February 2008 to determine the most important character-defining elements of the Cyclorama building. The NPS Historical Architecture program provided the park with a list of architectural elements that should have representative samples retained for future research. The park determined in August of 2008 that none of these items met the park's Scope of Collection Statement and will therefore not be retained by the park in their museum collection. The University of California, Los Angeles currently has the personal papers of Richard Neutra in their collections. The NPS contacted them via telephone to inquire if any of the architectural elements could be included in their Neutra collection. The university replied that they only collect archival material. The Museum of Modern Art was contacted in September of 2008, and due to the size and number of items being retained, the museum was unable to accept this collection. The NPS also sent a letter to the National Building Museum in February of 2009 requesting consideration of these materials, and the NPS received no response to this letter.

The NPS distributed a press release which initiated the 30-day public review and comment period on August 22, 2012. The press release and EA were posted on the park's PEPC website (<http://parkplanning.nps.gov/cycloramaea>), and hard copies of the EA were made available at the park museum and visitor center and at the Adams County Public Library. The press release was

sent out to the park's mailing list, as well as printed in the local newspapers. The EA was made available to federal, state, and local regulatory agencies; local businesses; and interested individuals for their review. Public comments on the EA were collected via PEPC, email, comment forms, and by mail. A public meeting was held by park staff on September 6, 2012, at which time the NPS provided information about the EA alternatives and the NPS preferred alternative and solicited public comments on the document.

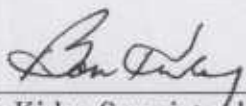
A total of 1,631 pieces of correspondence were received during the public review period via email, comment form, hardcopy, or the PEPC website. The majority of commenters were generally supportive of the Selected alternative. Among those who supported the selected alternative, many commenters expressed their support for the efforts to rehabilitate the landscape to more closely reflect the battle and commemorative era conditions, appreciation for the creation of open space for visitors, as well as the restoration of monuments to their commemorative-era locations. Some commenters offered suggestions, if demolition is undertaken, that included encouraging the possible recycling of building material, commemorating the building through interpretive signs or displays, retaining some degree of parking in the area while providing for rehabilitation of Ziegler's Ravine, or other measures included in the EA's alternatives and mitigation measures. Correspondence was also received from a number of individuals and organizations opposing demolition of the building and in many cases, expressing a desire to retain the building for rehabilitation and reuse. Correspondence opposing demolition included numerous petition signatures solicited by the Recent Past Preservation Network and other entities which had been submitted to the NPS prior to the EA process but were resubmitted as part of the scoping and public review of this EA. Some commenters expressed support for other alternatives analyzed in the EA. Others raised substantive issues (questioning the facts of the EA and requiring a response) including the relationship of the proposed action to the existing GMP; restoration of the battlefield and the span of the commemorative era; costs associated with the movement of the building to another location; dismissal of other alternatives; and accuracy of the description of impacts on the battlefield resources, structures, and features. A summary of the substantive comments received with NPS responses and errata are included as attachment B of this FONSI. The errata make factual corrections to the text of the EA. No changes were made to the selected alternative or impact analysis as a result of agency and public comments.

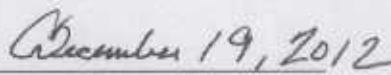
## FINDING OF NO SIGNIFICANT IMPACT

The NPS has selected alternative B, Demolition of the Cyclorama Building, for implementation. The selected alternative is described on pages 31-35 of the EA. The selected alternative will not have a significant effect on the human environment. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the Selected alternative will not violate any federal, state, or local environmental protection law.

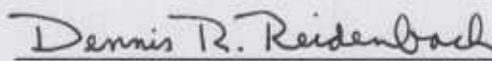
Based on the foregoing, it has been determined that an EIS is not required for this action and thus will not be prepared.

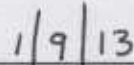
Recommended:

  
Bob Kirby, Superintendent  
Gettysburg National Military Park

  
Date

Approved:

  
Dennis R. Reidenbach, Regional Director  
Northeast Region, National Park Service

  
Date



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## **ATTACHMENT A: NON-IMPAIRMENT DETERMINATION**

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (16 USC section 1). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (16 USC 1a-1).

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, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the Nation Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

The NPS has discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park (NPS 2006 sec. 1.4.3). However, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006 sec 1.4.3). An action constitutes an impairment when its impacts “harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (NPS 2006 sec 1.4.5). To determine impairment, the NPS must evaluate “the particular resources and values that would 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” (NPS 2006 sec 1.4.5).

This determination on impairment has been prepared for the selected alternative described in this FONSI. An impairment determination is made for all resource impact topics (historic structures, cultural landscapes, archeological resources, and scenic resources) analyzed in the EA for the selected alternative. An impairment determination is not made for local roads and park access, gateway communities, visitor use and experience, or park operations and park facilities because impairment findings relate back to park resources and values, and these impact topics are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

### **Historic Structures**

Under the selected alternative, the Cyclorama building, a National Register-eligible historic structure, will be demolished and the immediate area will be rehabilitated to reflect the 1863

battle conditions and its subsequent commemoration. The building exhibits a high level of integrity and is a representative example of Richard Neutra's work and the Mission 66 period. In addition, a historic stone wall located to the east of the Cyclorama building office wing will be impacted by the demolition of the building. After demolition of the Cyclorama building and implementation of site restoration, water infiltration and runoff impacts to Meade's Headquarters and the Leister barn could be expected to decrease, resulting in a preservation of their external features and settings. The historic settings of the Brian buildings and historic commemorative-era monuments will be improved as well.

The selected alternative will result in both adverse and beneficial impacts on historic structures. Adverse impacts will result due to the permanent loss of a National Register-eligible historic structure (the Cyclorama building). However, after the building is demolished, water infiltration and runoff impacts to Meade's Headquarters and the Leister barn could be expected to decrease, resulting in the preservation of their external features and setting. The demolition and subsequent loss of the Cyclorama building will not be significant because the Cyclorama building is not a unique representation of Neutra's work, as examples can be found in other parks and locations throughout the U.S.

The selected alternative will not result in impairment of historic structures because the period of significance as approved by the Keeper of the National Register for the historic battle and commemorative features at Gettysburg National Military Park is 1863-1938. The Cyclorama building is outside this period of significance and does not support the park's mission, purpose, and significance. The selected alternative is consistent with the 1999 GMP's goal of rehabilitation of the 1863 battle and 1864-1938 commemorative-era landscapes and, in the SHPO's opinion, it is more important to "focus on the battle and the landscape instead of the 1962 Cyclorama building, which as time has demonstrated, is incapable of protecting and preserving the Cyclorama painting itself." In a subsequent letter dated September 10, 2010, the SHPO stated, "demolition of the Cyclorama building in order to return the area to its appearance at the time of the battle is the best alternative." Demolition of the Cyclorama building is an adverse effect under Section 106 of the NHPA due to its status as a National Register-eligible property. The adverse effect of demolishing the structure was addressed in the July 1999 MOA. Recordation of the structure and other mitigation measures stipulated in the MOA have been completed.

### **Cultural Landscapes**

The improvements under the selected alternative will rehabilitate the unique cultural landscapes within the study area by restoring topographic features in areas previously disturbed by construction of the Cyclorama building and associated sidewalks and parking.

The implementation of the selected alternative will cause noticeable, adverse impacts to cultural landscapes in the project area during demolition of the Cyclorama building. However, overall, the selected alternative will result in a beneficial impact on cultural landscapes because the nationally significant 1863 battle and commemorative-era landscapes that are key to the purpose and significance of the park will be rehabilitated.

The selected alternative will not result in impairment of cultural landscapes because the selected alternative will improve the cultural landscape.

### **Archeological Resources**

Under the selected alternative, ground-disturbing activities associated with demolition of the Cyclorama building and restoration of the 1863 landscape features have the potential to adversely impact archeological resources, including 2 acres where supplies and vehicles will move between the building site and parking lot. Impacts to archeological resources will likely be minimal within the immediate vicinity of the Cyclorama building because this area was highly disturbed as part of the excavation for the construction of the building.

Demolition and transport activities could also impact historic fencing and stone walls, particularly along the boundaries of the fields of Peter Frey and David Ziegler. Any new ground disturbance, implementation of staging areas, roadways, and demolition sites will be preceded by an archeological survey to identify and avoid archeological resources uncovered during earlier archeological mitigation or through historic research, and to ensure that there are no significant archeological resources that could be impacted by the work. Should archeological resources be encountered, procedures to implement Section 106 of the NHPA will be instituted, and the NPS will take appropriate steps to avoid, minimize, or mitigate any adverse effects to the resources.

The selected alternative will result in an adverse impact on archeological resources due to the potential for disturbance or loss of archeological resources in the project area. These impacts will not be significant because the area has been heavily disturbed, resulting in low probability that important archeological resources exist or will be found.

The selected alternative will not result in impairment of archeological resources because the area has already been heavily disturbed, resulting in low probability that important archeological resources exist or would be found. In the event that archeological resources are encountered, steps will be taken to avoid impacts to these resources. Therefore, little to no integrity of relevant archeological sites will be lost.

### **Scenic Resources**

The improvements under the selected alternative will rehabilitate historic 1863 battle and commemorative-era viewsheds on North Cemetery Ridge and restore the unique scenic and cultural resources of Pickett's Charge and the Battle of Gettysburg within the study area by demolishing the Cyclorama building and associated sidewalks and parking. This will allow for better visitor understanding of the history of the site.

The implementation of the selected alternative will cause noticeable, adverse impacts to scenic resources in the project area during demolition of the Cyclorama building. However, overall, the selected alternative will result in a beneficial impact on scenic resources because this alternative will remove the Cyclorama building from within the historic viewsheds related to the 1863 battle at Gettysburg, the Cemetery Hill defense, and the commemorative-era.

The selected alternative will not result in impairment of scenic resources because the selected alternative will support the park's mission by improving visitor understanding of and appreciation for the history of the site.

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## **ATTACHMENT B: SUBSTANTIVE COMMENTS WITH NPS RESPONSES AND ERRATA**

Public comments received on the *Final Disposition of the Gettysburg Cyclorama Building Environmental Assessment* (EA) were analyzed by reviewing each piece of correspondence, extracting comments according to the specific issue or concern expressed, grouping similar comments according to the issue or concern expressed and whether the issue was substantive (questioned, with a reasonable basis: the accuracy or adequacy of the EA; presented reasonable alternatives other than those contained in the EA; or caused changes or revisions in the proposal, requiring a response) or non-substantive (expressed a view or opinion, not requiring a response). Substantive comments are summarized below with the NPS responses and errata correcting the text of the EA, as applicable. Non-substantive comments are summarized above in the Public Involvement section of this FONSI. The full text of all correspondence received during public review of the EA is available on the NPS Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov/cycloramaea>.

Substantive comments on the EA included the relationship of the proposed action to the 1999 *Gettysburg National Military Park General Management Plan*; restoration of the battlefield and the span of the commemorative era; costs associated with the movement of the building to another location; dismissal of other alternatives; and accuracy of the description of impacts to the battlefield resources, structures, and features. The discussion below provides representative comments on the substantive issues raised and NPS responses to those comments. The representative comments are quoted exactly as provided by the commenter. Grammar and/or editorial mistakes have not been corrected. Corrections made to the text of the EA based on these comments are included in an errata list following the summary of comments and responses.

### **Responses to Substantive Comments**

## **PURPOSE OF AND NEED FOR THE PROJECT**

### **Purpose and Need - Rehabilitation of the Landscape to Battle-era Conditions and the Commemorative-era 1864-1938**

**Representative Comment:** It is said that destruction would help to understand the historical genius loci by restoring the landscape again. This argument would arbitrarily apply to any historical landmark being built in the open landscape. It also lacks credibility in that intrusive monuments nearby as well as the adjacent highway with motels and restaurants are not proposed to be eliminated.

**Representative Comment:** Despite the presence of numerous fast food restaurants, gas stations and tourist “grot” shops within several hundred yards of the current Cyclorama location, the EA repeatedly implies that the Cyclorama is the only structure in the vicinity that is not in keeping with the setting of the 1863 battle.... Why are these monuments (which clearly did not exist at the time of the 1863 battle!) granted a “historic footprint” while the Cyclorama building is not? If

the same logic that is used to argue in favor of demolishing the Cyclorama were applied universally throughout the park, all of the great monuments, such as those erected by the states of Virginia and Pennsylvania, would seemingly have to be removed.

**Representative Comment:** To continually suggest that removal of this building will result in a landscape that is similar to its appearance in 1863 is inaccurate. There are no plans to remove the hundreds of monuments erected during the last 150 years to commemorate the many lives lost nor are there plans to remove later fences or paved roads that allow visitors to explore and understand the events that occurred there. The construction of the Cyclorama building is one more addition to a landscape that was already very different than its appearance in 1863.

**Representative Comment:** If you do truly wish to restore the battlefield then ALL of the historical markers for who fell where and when must also be removed. If historical accuracy for future generations is the goal then all monuments must be cleared from the battlefield.

**Representative Comment:** The EA indicates that the era of the commemoration of the battle by veterans is 1864-1938 (p. 5). Thus, the plan is not to “restore” the battlefield, for to do so would mean the removal of a century’s worth of monuments. Nevertheless, Map 21 on page 163 of the EA (regarding the Treatment Plan for the Defense of Cemetery Hill site) acknowledges the presence of only two post-Civil War elements, and omits the locations of dozens of monuments that will be scattered throughout the landscape. The map gives the impression of a nearly pristine 1863 battlefield landscape, which clearly it will not be.

**RESPONSE:** The purpose of the proposed action is to continue to rehabilitate the landscape of the North Cemetery Ridge to its 1863 battle and 1864-1938 commemorative-era appearance, not to “restore” the battlefield to the 1863 appearance. This rehabilitation to the 1863 and commemorative-era appearance includes retention of the commemorative-era monuments constructed by battle survivors as well as return of monuments to the original commemorative-era locations as established by the veterans of the civil war. The monuments erected on the battlefield by the survivors of the battle in honor of their fallen comrades are acknowledged in the Congressional Acts establishing Gettysburg National Military Park. As summarized within the document on page 4, the legislative purposes of the park unit as directed by Congress are:

- to preserve the topographical, natural, and cultural features that were significant to the outcome of the Battle of Gettysburg
- to mark the lines of battle and to preserve the monuments and markers that commemorate the struggle
- to provide opportunities for people to learn about the Battle of Gettysburg in the full social, political, and cultural context of the Civil War and American History
- to preserve the objects, artifacts, and archives that document the battle, its aftermath, and Commemoration

As recently as 1990, Congress directed that in administering the park “The Secretary [of the Interior] shall take such action as is necessary and appropriate to interpret, for the benefit of visitors to the park and the general public, the Battle of Gettysburg in the larger context of the



Civil War and American history including the causes and consequences of the Civil War and including the effects of the war on all the American People” (An Act to revise the boundary of Gettysburg National Military Park in the Commonwealth of Pennsylvania, and for other purposes. Public Law 101-377, August 17, 1990).

One comment also indicated that Map 21 on page 163 of the EA “omits the locations of dozens of monuments that will be scattered throughout the landscape.” The Map and text on page 163 of the EA is not from the main body of the document, but from appendix C of the treatment plan from the *Cultural Landscape Report: Defense of Cemetery Hill* (CLR). Map 21 illustrates landform and feature restoration that will be undertaken as part of the rehabilitation. Figure 4 contained in the main body of the EA is the illustration of the proposed rehabilitation associated with the selected alternative.

### **Purpose and Need - Commemorative Nature of the Cyclorama Building**

**Representative Comment:** The “analysis” in the EA is premised on the idea that the Cyclorama Building must be removed from its current location in order to allow Gettysburg’s “commemorative landscape” to be restored. But the NPS’ own documents (including Allaback study referenced above) make it clear that the Cyclorama Building was explicitly intended to be a commemorative memorial...not just by Mr. Neutra, but also by the NPS. That critical fact appears nowhere in the EA.

**RESPONSE:** The commemorative landscape discussed in this EA refers to those commemorative features associated with the veteran-built park, as described on page 3 of the EA. The period of significance as approved by the Keeper for these commemorative features at Gettysburg National Military Park is 1864-1938, as described on page 5 of the EA. The following text has been added to the EA to further clarify that period of significance: “The commemorative monuments throughout the park were placed almost entirely by veterans of the battle within their lifetimes. The 1938 endpoint marks the 75th anniversary of the battle and the dedication of the Eternal Peace Light Memorial at the last great reunion of the battle’s veterans.”

### **Purpose and Need - Recognition of Significance of the Cyclorama Building**

**Representative Comment:** While the request for comment appears to focus on the question of whether or not to keep or demolish the old Cyclorama building the premise appears to be solely on the value of the site as open space and the building’s affect on that value. It pointedly avoids study of the cultural, design and historic value of the building on this site. ... Architectural historians and scholars have well documented the value of the building as a significant work of architectural design and others have spoken well on the importance of preserving this significant work. The choices given, however, are all focused not on the merits of the building but that of the historic site and the building’s affect on that site. This decision should be based on the significant merits of the building, its historic role in the Mission 66 program, and the fact that it has now occupied its site for over 50 years; a third of the life of the battlefield. No matter how

the issue is colored by partisan historians its presence does not have a significantly negative affect on the historic value of these sacred battlegrounds. To remove it, would do damage to Ziegler's wood that would take another 50 years to heal. ... Great architecture like other great art should be protected, not cast aside like an old appliance. Unlike other forms of art great architecture serves a specific purpose that involves physical human interaction. Unlike a painting it can't necessarily be moved to a more convenient location. In most cases like this its design is site specific. That is it was designed to relate to the geography of the terrain where it's located.

**Representative Comment:** [T]he EA in general, understates the significance of the Cyclorama building in a way that appears biased. For example, the language quoted above suggests that the Cyclorama building is not nationally significant, and that its location was not intentionally chosen by the National Park Service. Furthermore, the EA shows its bias in Tables 1 and 2 of the Summary Comparison of the Alternatives (pages 48-53), referring to the building simply as a "modern intrusion" (page 50) or a "dilapidated and modern building" (page 52). The EA shows a lack of objectivity in failing to recognize the central role of the NPS itself in adopting and implementing the interpretive philosophy that led to the intentional siting and design of the Cyclorama building in its current location. This objectivity is crucial to the credibility of the NPS in making the difficult decision at hand regarding the future of the Cyclorama building.

**RESPONSE:** As described in the document, the purpose of and need for the proposed action traces back to the reasons for the establishment of Gettysburg National Military Park, the legislation directing its preservation, park management direction as formulated in the nearly decade long development of the GMP/EIS approved in 1999. Additionally, the EA also incorporates information derived from the consultation processes undertaken as part of that planning effort under the provisions of Section 106 of the National Historic Preservation Act of 1966 and the regulations of the Advisory Council of Historic Places implementing that provision. Those processes included consideration of the architectural importance of the Cyclorama building, its design context within the Mission 66 program, and the stature of the architect and his approach to the design within the direction of the NPS.

### **Purpose and Need - Consideration of Amendment or Changes to the Existing GMP**

**Representative Comment:** NEPA requires that agencies consider and pursue reasonable alternatives to their proposed actions. Reasonable alternatives include those requiring plan amendments and/or regulatory changes. The NPS retains authority to revise both the GMP and the CLR. Therefore, even if the GMP or the CLR purported to require demolition of the Cyclorama Building (and, for the reasons set forth above, they do not), neither document could justify the NPS' rejection of non-demolition alternatives under NEPA.

**RESPONSE:** No new and compelling information was presented during the scoping period which would require the NPS to re-visit the basic management decisions contained within the approved GMP and 106 consultation process carried out as part of that process.

## **Purpose and Need - Consideration of Material Supplied During Scoping and Availability of Background Information**

**Representative Comment:** The EA's failure accurately to address - and, in some cases even to mention - significant aspects of the Cyclorama Building is particularly disappointing in light of the fact that the Recent Past Preservation Network's October 1 2010 scoping letter provided NPS with detailed information, supported by numerous citations to source documents, on each and every one of the bullet points listed above. NPS' refusal to incorporate and address material properly submitted as part of the scoping process is arbitrary, capricious, and a violation of NEPA.

**Representative Comment:** The Park Service Failed To Make Available Critical Information, Thereby Precluding Effective Public Review And Participation In The NEPA Process NEPA requires that federal agencies "carefully consider significant environmental impacts," but, as the Supreme Court has observed, the statute "also guarantees that the relevant information will be made available to the larger audience that may also play a role in both the decisionmaking process and the implementation of that decision. 5 For that reason, federal agencies must ensure that relevant information is "available to ... citizens before decisions are made and before actions are taken. 6 Here, the NPS failed to make critical information available to the public, thereby precluding effective public review and participation in the NEPA process.

- The NPS relies on a 2006 "Scope of Collection Statement," to justify its refusal to consider any alternatives or mitigation measures that would conserve the Cyclorama Center's character-defining features at Gettysburg National Military Park. But the "Scope of Collection Statement" is not included in the appendices to the EA. Nor is it available on the project website. Therefore, it is not possible for the public to evaluate the agency's claim that mitigation measures and/or alternatives that would conserve portions of the Cyclorama Center at Gettysburg National Military Park are infeasible

- The NPS relies on a set of documents referred to as "2004 National Register Documentation" to justify its conclusion that the Cyclorama Center cannot be relocated within Gettysburg National Military Park. But the "2004 National Register Documentation" is not included in the appendices to the EA. Nor is it available on the project website. Nor is it available on the portion of the (agency-wide) NPS website devoted to National Register materials. 7 Without the "2004 National Register Documentation" it is not possible to evaluate the NPS' claim that the Cyclorama Building cannot be relocated within Gettysburg National Military Park or to provide meaningful input regarding alternative means of relocating the Cyclorama Building so as to accommodate both the building and the most important features of the battlefield.

- The sections of the EA addressing project purposes and alternatives (sections 1 and 2, respectively) rely quite heavily on NPS' asserted need to implement a 2004 Cultural Landscape Report ("CLR"). Appendix C to the EA includes an excerpt from the CLR, but does not provide the full document. Nor is the full CLR available on the project website. Under these circumstances, it is not possible to fully evaluate NPS' assertion that the CLR must be implemented, to properly review the agency's proposed method of implementing the CLR, or to provide meaningful input on alternative means of implementing the CLR.

**RESPONSE:** The NPS appropriately considered the information provided by the Recent Past Preservation Network. The bulk of this information consisted of petitions and documents presented during the course of the prior litigation. All of the information provided from all sources during the scoping period was taken into consideration and helped inform the development of alternatives and impacts addressed in the EA. The EA includes a discussion of the public involvement efforts and the scoping comments received, as well as information about the litigation and its resolution. The documents referred to above, and used as background material for the EA, were publically available upon request. One individual requested copies of the parks 2004 National Register Nomination and GMP/EIS during the public comment period; copies were sent and receipt was acknowledged in a reply. Further, the NPS considered all of these documents in identifying Alternative B as the NPS preferred alternative in the EA and in making the determination to select Alternative B for implementation.

## **ALTERNATIVES**

### **Alternatives Cost Estimates and Allocation of Costs Alternative C**

**Representative Comment:** On page 50, in the Summary Comparison of the Alternatives, and in other places in the EA, the figure of \$44.8 million is used as the estimate for Alternative C, Relocation of the Cyclorama Building Outside the Park by a Non-NPS Entity. By its own description, the EA states on page 48 and elsewhere in the document that “The entity would be responsible for all costs associated with moving the structure?” What would be more helpful for point of comparison, would be a realistic estimate of what expenses the National Park Service would actually sustain, should an outside party take on the task of removing the Cyclorama Building from its current site and relocating it elsewhere.

**Representative Comment:** Move it off of the historic landscape. I oppose this alternative. This alternative would be too costly to United States taxpayers. The gawky and worn-out Cyclorama serves no lasting national value, if it ever did. The costs to remove the structure and locate it on other property would be better used to provide NPS with additional funds to rehabilitate historic national battlefields, particularly in the Western theatre of the Civil War and at Revolutionary War sites.

**Representative Comment:** To move the building would be a mind boggling, not to mention incredibly expensive, project. Where would it go? How could it be moved? The price tag mentioned is huge, especially in these economic times? How could the NPS or Foundation justify spending those funds when there is no plan as to how to reuse the building.

**RESPONSE:** The document notes that move costs would not be borne by the NPS. The EA also states on page 31, footnote 1, that the cost estimates found in appendix D are approximate and may be based on parameters that differ slightly from the alternatives described in the EA. The detail included in the estimates provides for an appropriate order of magnitude of the final cost and are sufficient to allow for comparison of alternatives. Lastly, consideration of the potential sources of funding would not add to the analysis or the comparison of alternatives.

## **Alternatives - Consideration of Alternative Building Uses**

**Representative Comment:** I have so many great ideas I'd like to see explored or displayed in such a new iteration of our building, including a realistic diorama depicting exactly how the battlefield looked in '63, sans monuments, roads, fast food joints and motels. Various programs could be devised for showing in our circlorama theater including, among others, a re-enactment of the three day battle day by day replete with sounds, fury and the smell of gunpowder! After this, one goes to our roof deck to view what the battlefield looks like today. Another such program could trace the history of the Gettysburg Address. How did Lincoln first learn about this and decide to attend. How many drafts did he write and when, and how come he was so upstaged with another? How about a depiction of the process whereby the painter recreated a snapshot of what happened during those three fateful days? With such a repurposing our monument could take it's place along with the new visitor's center as a valuable addition and supplementation to what is shown in the new facility. Our view platform would be a formidable reminder of what the painter saw, when he composed the cyclorama display, and how this scene has evolved over these many years.

**Representative Comment:** On my visit to this historic area in 2011 while I was denied access to this building, walking around the outside I felt the experience of this extraordinary design space as defined by Neutra. It is truly a significant building well deserving protection. It should be placed on the national register of historic places and repurposed for public educational use. The loss of the old Cyclorama building would be an unfortunate national and world cultural loss for us all. The Environmental Assessment states the NPS has no plan for making use of the building as its justification for offering only "mothballing" the structure rather than repurposing it. It has many outstanding assets now being ignored that the NPS could use to enhance the visitor experience. In addition to making use of the observation area, one logical feature that should be used is the well-designed stage and outdoor seating area for outdoor historical presentations. This would be a perfect place for portrayals of President Lincoln's Gettysburg Address given that the exact location of the delivery of the president's address is not known. This could be part of making the entire building a museum with focus on President Lincoln and his administration during this time. Part of the building, albeit a small part, could be focused on the building itself and its place in the National Park Mission 66 program and the architect and his role in this historic program. In celebration of high quality American design it is becoming common to devote space to provide background on the development of great architectural endeavors. Examples include the restoration and reconstruction of the California State capitol building in Sacramento Calif. and the Experience Music Project building designed by Frank Gehry in Seattle Wash. In these as with other examples a room has images of the project development and plans available for those able and interested in them. At any rate with the focus being only on clearing the site of a post Civil War structure there are a lot of possibilities that are being ignored. A fair and objective judgment of this matter clearly speaks to the value of the option currently dismissed. Restore and repurpose the building!

**Representative Comment:** The EA also justifies the rejection of alternatives to demolishing the Cyclorama Building on the ground that the agency has no need for continued use of the building.

The EA provides no explanation of or citation in support of that conclusion. Nor is there any sort of "needs" assessment included in the EA or the appendices thereto.

**RESPONSE:** A number of alternatives were considered that would restore and repurpose the building for a variety of uses, similar to the uses suggested by the commenters. These alternatives were ultimately dismissed from further analysis because restoring and repurposing the building in place, regardless of the specific use(s), is not consistent with the purpose and need for the action. The Cyclorama building is located on some of the Battle of Gettysburg's most historically significant ground. The purpose and need for action is to improve visitor understanding of the major battle action and the commemoration that took place on the ridge by rehabilitating the landscape in accordance with the decisions made in the 1999 GMP and approved ROD and the treatment recommendations in the 2004 CLR.

### **Alternatives - Alternatives Dismissed from Further Evaluation**

**Representative Comment:** The EA fails to evaluate the alternative of relocating the Cyclorama Building to another site within Gettysburg National Military Park for adaptive use by a lessee. Such an alternative would seem to address two of the NPS' stated concerns (the agency's claim to have no use for the building and desire to implement the CLR on Cemetery Ridge). It also appears to meet the statement of purpose and need set out in the EA. And, perhaps most importantly, it would allow the Cyclorama Building to be preserved.

**Representative Comment:** The EA's most glaring omission is not including rehabilitation of the Cyclorama building among the viable alternatives presented. The primary rationale for relegating this option to the "dismissed" section is once again the 1999 GMP planning process. Would any reasonable person expect those who favor preserving the Cyclorama to accept this reasoning? Clearly rehabilitation of the exterior and interior of the Cyclorama should have been included as a viable alternative if the EA was to maintain impartiality. .... ? The continued insistence that the NPS has "no feasible use" for the Cyclorama building isn't credible. The reason for this supposed lack of utility appears to originate with the 1999 GMP planning process in which it was determined that the Cyclorama should be destroyed in favor of utilizing other structures. It was never the case that the building couldn't be rehabilitated and put to productive use (it still can be today, as delineated by Alternative C in the EA), but rather it was deliberately determined that it would be destroyed instead.

**RESPONSE:** The EA considered but dismissed from further analysis two alternatives that included relocation of the Cyclorama Building to other sites within the park coupled with NPS efforts to see other uses for the structure. In both cases, the relocation would result in impacts to areas where major battle action took place or would be visible within the historic viewshed. These alternatives are discussed on pages 45 and 46 of the EA. The NPS also considered but dismissed two alternatives for rehabilitation and adaptive reuse of the building because retention of the building is in conflict with the overall goals and purposes of the park to preserve the landscape and setting of the 1863 battle and 1864-1938 commemorative-era landscape. These alternatives are discussed on pages 44 and 45 of the EA.

## **Alternatives - Definition of the Commemorative Landscape**

**Representative Comment:** The EA also justifies the rejection of alternatives to demolishing the Cyclorama Building on the ground that the building interferes with the "commemorative landscape" at Gettysburg National Military Park. But, as noted above, the NPS' own documents show that the Cyclorama Building is, in fact, a commemorative structure.

**RESPONSE:** The NPS disagrees with the commenter's characterization that the structure is "commemorative." The commemorative-era landscape discussed in this EA refers to those commemorative features associated with the veteran-built park, as described on page 3 of the EA. The period of significance as approved by the Keeper of the National Register of Historical Places for these commemorative features at Gettysburg National Military Park is 1864-1938, as described on page 5 of the EA. We have added the following text to the EA to further clarify that period of significance: "The commemorative monuments throughout the park were placed almost entirely by veterans of the battle within their lifetimes. The 1938 endpoint marks the 75th anniversary of the battle and the dedication of the Eternal Peace Light Memorial at the last great reunion of the battle's veterans."

## **Alternatives - Relationship Between Building Location and Historic Significance**

**Representative Comment:** The EA also justifies the rejection of alternatives to demolishing the Cyclorama Building on the ground that moving the building to a new location would destroy the structure's "originally designed context" and "integrity." In other words, the NPS has rejected alternatives to demolition of the Cyclorama Building on the ground that those alternatives might harm the building's historic significance. Frankly, this sort of "reasoning" is an embarrassment.

**RESPONSE:** The NPS does not reject the alternative of moving solely on the ground that alternatives might harm the buildings historic significance. The NPS merely notes that one of the consequences of moving the building may be the delisting of the structure from the National Register.

## **Alternatives - Development Envisioned for Cemetery Hill**

**Representative Comment:** The NPS' proposal involves replacing existing buildings and infrastructure near Cemetery Hill (including the Cyclorama Building) with, among other things, a parking structure capable of accommodating more than 60 vehicle. This appears to be more than twice as large as the parking lot contemplated in the CLR. It is arbitrary and capricious for the NPS to reject alternatives to demolition on the ground that they are (allegedly) inconsistent with the CLR while simultaneously endorsing a different proposal which is plainly inconsistent with the CLR.

**RESPONSE:** Parking at Cemetery Ridge is needed for access to the Soldiers' National Cemetery and the ridge itself. The underlying goal of the GMP is to rehabilitate and manage resources so that the features that were significant to the outcome of battle can be understood (page 124 GMP). Reducing the size of and reconfiguring the parking lot meets the above objective. Other key elements of both the battle and commemorative landscapes that had a more prominent role in

the history of the site can be rehabilitated. The NPS recognizes that the parking lot never existed during the period of significance. However, the NPS must also balance protection of mission critical resources against the need to provide visitor access for the understanding and enjoyment of present and future generations. Ultimately most of Ziegler's Ravine and the majority of the 44 acre site will be rehabilitated to its period of significance. Major topographic features and large scale obstacles will be replaced or removed to provide a more complete understanding of the site. Thus, the selected alternative will provide the maximum amount of rehabilitation while providing necessary access to visitors and, therefore, meets our purpose and need for taking action.

### **Alternatives - Mitigation Measures and Important Features of the Cyclorama Building**

**Representative Comment:** Important features of the Cyclorama building could be preserved by donating them to appropriate museums or other non-profit organizations. Our understanding is that Preservation Pennsylvania and the Friends of the Neutra VDL Research Site Planning Task Force have already expressed interest in facilitating and/or participating in such an arrangement. Once notified, other stakeholders may also be interested.

**RESPONSE:** On page 20 of the EA, NPS describes the efforts made to find a home for those character-defining features identified in the HABS report and by the Northeast Region Historical Architect. None of the repositories contacted were interested, or responded to the NPS request that these items find a permanent home. This is the first time the park has heard that either of the organizations mentioned are interested in the important features of the Cyclorama building. NPS is more than willing to work with a nonprofit organization to make arrangements to preserve those features identified in the HABS report.

## **AFFECTED ENVIRONMENT**

### **Affected Environment - Architectural Importance of the Cyclorama Building**

**Representative Comment:** But the EA says almost nothing of substance about the building, its architectural importance, its historic significance, or Richard Neutra, the architect who designed it. Indeed, the EA's (paltry) list of references contains just one resource substantively addressing the Cyclorama Building (identified in the EA as "Allaback, 2000"). Moreover, the information provided in the EA is incomplete, misleading, inaccurate, or some combination of the three. ...

**Representative Comment:** As an architectural historian that relies on the NPS for guidance on best practices, I am a bit puzzled and certainly discouraged. To know that an agency that sponsored two comprehensive conferences on the recent past in 1995 and 2000 and produced a volume on Mission 66 Visitor Centers, which directly relates the significance of the Cyclorama, has essentially treated the Cyclorama as an inconsequential feature on the landscape is troubling. To be fair, the significance of the Cyclorama is discussed within the body of the EA, but it is both shallow and inconsistent, ignoring the multiple contexts for which the Cyclorama has been determined significant and considered "exceptional" by the Keeper of the National Register of



Historic Places. Indeed, the document blatantly fails to acknowledge these factors of multiplicity in significance and the consequences to said contexts should the Cyclorama be demolished.

**Representative Comment:** The EA notes that the Cyclorama Building was determined eligible for listing in the National Register of Historic Places by the Keeper of the National Register. But the document fails to mention that the Keeper found the building to have exceptional historic and architectural significance. Indeed, the Keeper's determination of eligibility appears nowhere in the EA, the appendices to the EA, or the list of references within the EA. The EA fails meaningfully to address the fact that the Cyclorama Building's importance is not limited to Gettysburg National Military Park. The building is also significant as an example of NPS' Mission 66 program, and, more specifically, the agency's historic effort to commission Mission 66 visitor centers from important mid- 20th century architects. Only five such structures were ever built, and just four of those (including the Cyclorama Center) remain standing today...

**RESPONSE:** The eligibility of the Cyclorama building for its association with architecture and a renowned architect is not under dispute, and that eligibility and association is clearly described in the EA (see pages 10-12, 16, 55-56, 71- 73 of the EA). The information presented in the EA is drawn from a variety of sources, including the Keeper's finding and Sarah Allaback's *Mission 66 Visitor Centers: The History of a Building Type*, cited in the bibliography as available at [http://www.cr.nps.gov/history/online\\_books/allaback/index.htm](http://www.cr.nps.gov/history/online_books/allaback/index.htm). Inclusion of the Keeper's finding in its entirety in the EA itself is not necessary to support the analysis as relevant factors and information from the nomination are captured and included in the EA.

#### **Affected Environment - Consideration of the Reputation and Career of Richard Neutra**

**Representative Comment:** The EA makes no effort to identify or evaluate the significance of the Cyclorama Building in the context of the career of Mr. Neutra. That is no small omission, for Mr. Neutra is among the world's most famous, highly-regarded and influential architects.

**RESPONSE:** The EA recognizes the design work of Richard Neutra, his stature within the architectural community and his international reputation (see page 55 of the EA). The EA compares the Cyclorama building to other Mission 66 visitor centers within the NPS on page 6, paragraph 4. On page 74, paragraph 1, the EA also discusses other representative examples of Neutra's work. Further discussion of Mr. Neutra's career or accomplishments would be not necessary given the fact that this information was taken into consideration in the National Register listing of the property and the consultation process under Section 106 of the National Historic Preservation Act. Notably, the Section 106 process resulted in an agreement allowing for the demolition and removal of the structure as well as appropriate mitigation measures to be undertaken. The EA acknowledges and describes the Cyclorama building's architectural importance on pages 10, 11, 55, and 56. As the Council on Environmental Quality (CEQ) directs, the information and analysis in the EA is provided in the level of detail commensurate to what is necessary for the decision-making process.

## **Affected Environment - Development of the National Historic Landmark Nomination**

**Representative Comment:** Perhaps seeking to minimize the importance of the Cyclorama Building, the EA dismissively refers to those who consider the building eligible for National Historic Landmark as “private individuals.” That is inaccurate. The Cyclorama Building was nominated as a National Historic Landmark by the Society of Architectural Historians, the oldest and largest historical organization devoted to the scholarly study of the built environment. Moreover, the Landmarks Committee of the NPS' own Advisory Board supported the Cyclorama Building's eligibility for National Landmark status.

**RESPONSE:** The words “private individuals” were used to indicate that the NPS did not nominate the structure for landmark status. The sentence is revised to read: “The Cyclorama building was nominated by the Society of Architectural Historians, a professional organization, for National Historic Landmark Status....”

## **ENVIRONMENTAL CONSEQUENCES**

### **Environmental Consequences - Potential Damage to Cemetery Hill under the Move Alternative Options**

**Representative Comment:** The EA asserts that relocating the Cyclorama Center may result in permanent damage to the Cemetery Hill. But the document fails to provide any basis for that conclusion, any detail on what sort of damage might occur, any explanation for why such damage could not be mitigated or repaired, or any reason to believe the damage to the landscape would be different from that caused by demolition-related equipment and activities. Again, the NPS appears to have concocted this "problem" as a means of justifying its preference for demolition.

**RESPONSE:** The movement of the structure, whether in multiple pieces or two pieces, would result in impacts as described within the EA on pages 79, 80, and 81. Depending on the processes selected, the move would have an impact on 5.6 and 8.4 acres beyond the existing Cyclorama building footprint. Additionally, depending upon the move corridor selected, transport of the structure to established roadways would result in potential impacts to 86 features (cannons, monuments, trees, and utility points) or 43 features depending on the technique selected.

### **Environmental Consequences - Documentation of Damage to Other Historic Structures in the Area**

**Representative Comment:** The EA seems to conclude that demolishing the Cyclorama Building will have certain benefits for “historic structures.” That conclusion is based, in large part, on the inaccurate, unsupported, arbitrary, and capricious assumption that stormwater from the Cyclorama Building is damaging Meade’s Headquarters and the Leister Barn. But there is no evidence whatsoever that either building is suffering damage from stormwater runoff. In fact, there is no evidence that stormwater runoff from the Cyclorama Building even reaches Meade’s

Headquarters or the Leister Barn. It appears that the NPS has simply invented this “stormwater runoff problem: as a means of justifying its preference for demolishing the Cyclorama Building.

**RESPONSE:** As early as 1965 there were issues associated with water from the Cyclorama building impacting the battle-era Leister buildings. Norman M. Souder, architect with the NPS Eastern Office of Design and Construction prepared a Historic Structure Report (HSR) on Meade’s Headquarters. His first recommendation was “regarding of the area near the visitor center [Cyclorama Building] to divert surface water away from Meade’s Headquarters.” In 1985 NPS completed extensive replacement of rotted sill logs on the Leister Barn based upon recommendations in a more detailed HSR prepared by Reed Engle. The water problem is again discussed:

An 18” storm drain line and catch basin are located to the west, fifteen feet from the barn, with an outlet close to the southwest corner of the structure. They were installed sometime within the last three decades. The resultant outflow south of the barn has rendered the area swampy, formed a small stream, and produced high soil moisture conditions destructive to the fabric of the barn.

In 1986 NPS installed 200 linear feet of 18-inch pipe to the west and southwest of the Leister barn creating diversion swales and removing the above mentioned drop inlet in an attempt to divert the water flowing towards the Leister buildings.

The EA is revised on page 74 to read: “Water filtration and runoff impacts to Meade’s Headquarters and the Leister barn, documented in two Historic Structure Reports, could be expected to decrease....”

The following references have been added to the EA to support this discussion:

Ballard, David

1986 Leister Barn, Hand drawn plans illustrating removal of drop inlet and installation of new drainage patterns around Leister Barn, July 1986. This includes meeting notes entitled “Leister Orchard Replanting Plan Meeting, 1986.”

Engle, Reed

1985 *Historic Structure Report: Physical Fabric Section, Leister Barn, Gettysburg National Military Park, Gettysburg, Pennsylvania.* USDI, NPS, Office of Cultural Resource Management, Mid-Atlantic Region.

Souder, Norman M.

1965 *Historic Structures Report, Part II, Architectural Data Section on Meade’s Headquarters, Gettysburg National Military Park, April 1965.* USDI, NPS Eastern Office, Design and Construction, Division of Architecture.

## **Environmental Consequences - Level of Significance of the Cyclorama Building**

**Representative Comment:** The EA asserts that no significant impact will occur because the Cyclorama Center is not a unique representation of Richard Neutra's work. That is directly contradicted by the Keeper of the National Register, who found that that the building was "a rare example of Neutra's institutional design on the east coast and one of his very few federal commissions." Moreover, "uniqueness: is not a prerequisite to significance" under NEPA. If it were, only the last surviving example of each architect's work could be "significantly" impacted by agency action.

**RESPONSE:** As explained on page 74 of the EA, the Cyclorama building, including its association with Mr. Neutra, does not contribute to the purposes for which the park was established, as presented in the legislation; therefore, the demolition of the building is not a significant impact within the context of the park's purpose and significance. As indicated on page 74 of the EA, many examples of Mr. Neutra's work can be found throughout the nation, including another example within the NPS; therefore, the loss of the Cyclorama is not significant within the context of the national inventory of Mr. Neutra's work. The impacts to the building itself have been addressed in the Memorandum of Agreement (MOA) under Section 106 of the National Historic Preservation Act developed among the Pennsylvania SHPO, the Advisory Council on Historic Properties, and NPS.

## **Environmental Consequences - Economic Impact of Rehabilitation**

**Representative Comment:** The EA concludes that retention of the Cyclorama Building would likely lead to a "reduction in business" for nearby commercial establishments. The EA contains absolutely no evidence to support this proposition. Indeed, the NPS concedes that "the true impact" on the surrounding area is "unknown." This appears to be yet another attempt by the NPS to manipulate the conclusions of the EA to support the agency's preference for demolition.

**RESPONSE:** Information on likely economic impacts was drawn from "The Economic Impact of Travel and Tourism in Pennsylvania: Tourism Satellite Account Calendar Year 2010", published in 2012 by Tourism Economics ([http://cdn.visitpa.com/sites/visitpa.com/files/PA%20Travel%20Industry%20Economic%20Impact%202010%20-FINAL\\_Feb2012\\_0.pdf](http://cdn.visitpa.com/sites/visitpa.com/files/PA%20Travel%20Industry%20Economic%20Impact%202010%20-FINAL_Feb2012_0.pdf)), which includes Adams County. The study citation was omitted from the bibliography in the EA and has been added as an errata. The statement in the EA (page 93) that the presence of the vacated building under Alternative A may lead to a reduction in the number of people frequenting the area, which in turn may adversely impact the Steinwehr Business Owners, is based on the a comparison of the results of the 2012 study to the transition of the Cyclorama painting out of the Cyclorama building and into the new visitor center. The Cyclorama painting was closed to public access in November 2005 to stabilize and begin restoration for its installation at the new park museum and visitor center. The Cyclorama building itself was closed seasonally (December through April) from 2005 through 2007 and closed permanently to the public in December 2007. All visitor services, from both the Cyclorama and visitor center, were relocated and reopened at the current park museum and visitor center in April 2008. The results of the 2012 study indicate that visitor spending decreased 13.5% region wide between 2008 and 2009. Although it is true that we cannot

specifically assess the economic impacts to the Steinwehr Business Owners, it is true that, during this time period, tourism and tourism spending decreased 13.5% overall, and it is reasonable to assume that local economic trends would generally mirror county-wide economic trends. To clarify this assumption, the EA is revised on page 92 to read "...In some cases, local data was not available and county-wide data was used to estimate economic impacts."

### **Environmental Consequences - Visitation Changes and Rehabilitation of the Landscape**

**Representative Comment:** The EA states that demolition of the Cyclorama Building is likely to increase visitation to the Cemetery Hill area of Gettysburg National Military Park. But once the Cyclorama Center is demolished there will be no visitor facilities (shelters, restrooms, interpretive features, etc) near Cemetery Hill. The NPS has previously stated that it plans to address this issue by constructing new shelters and restroom facilities at Cemetery Hill after the Cyclorama Building. But the construction of such facilities is not addressed in the EA.

**RESPONSE:** The NPS has no plans to construct new facilities or shelters at the Cemetery Hill. It is also anticipated that once rehabilitation is accomplished, visitors will be interested in visiting the landscape and scene of the battle as part of their overall visitor experience at the park.

### **ERRATA**

Page 1, first paragraph, first sentence: revise to read "...rehabilitate the North Cemetery Ridge to its historic 1863 battle and 1864-1938 commemorative-era appearance..."

Page 1, third paragraph, first sentence: revise to read "The purpose of the NPS action is to continue to rehabilitate the landscape of the North Cemetery Ridge to its 1863 battle and 1864-1938 commemorative-era appearance..."

Page 3, second paragraph, last sentence: revise to read "...12.9 acres..."

Page 5, second paragraph: Add the following text after the third sentence:

"The commemorative monuments throughout the park were placed almost entirely by veterans of the battle within their lifetimes. The 1938 endpoint marks the 75th anniversary of the battle and the dedication of the Eternal Peace Light Memorial at the last great reunion of the battle's veterans."

Page 11, second paragraph: The "2009" in the following sentence, from the second paragraph under "Scoping" on page 11, should be "1999".

"The ACHP and the SHPO executed an MOA in July of 2009 for demolition of the Cyclorama building, and all required mitigation was carried out."

Page 16, second paragraph, last sentence: revise to read "...returned to their original historic 1863 battle and 1864-1938 commemorative-era locations..."

Page 25: The line that reads “This EA evaluates four alternatives...” should read:

“This EA evaluates three alternatives...”

Page 26, “Reconfigure the Existing Cyclorama Building Parking Lot to Rehabilitate Ziegler’s Ravine...” paragraph, last sentence: add the following to the end of the sentence:

“...to their commemorative-era locations.”

Page 27, last paragraph: Replace the last sentence of the paragraph, which continues on page 28, with the following sentence:

“In addition, the Cyclorama building sits on the historic 1863 site of the battle position and the commemorative-era location of monuments and cannon of the Battery F, 5th U.S. Artillery, so removal of the building will allow for this monument group to be returned to its original commemorative-era location.”

Page 42, fourth paragraph, fourth sentence: revise to read “...8.4 acres...”

Page 42, fourth paragraph, sixth sentence: revise to read “...5.6 acres...”

Page 42, fourth paragraph, last sentence: replace with:

“In addition, the battle-era and commemorative features would need to be protected.”

Page 54, first paragraph: add the following sentence to the beginning of the paragraph:

“In accordance with the DO-12 Handbook, the NPS identifies the environmentally preferable alternative in its NEPA documents for public review and comment [Sect.4.5 E(9)].”

Page 54, line 12: change the word “preferred” to “preferable”.

Page 56, third paragraph, first sentence: revise to read “The Cyclorama building was nominated by the Society of Architectural Historians, a professional organization, for National Historic Landmark Status...”

Page 57, first paragraph, first sentence: revise to read “contains historic and commemorative designed landscapes...”

Page 67, third paragraph, first sentence: revise to read “...12.9 acres...”

Page 72, first paragraph: revise to read:

“Several monuments that commemorate the 1863 battle would be moved and relocated to their original commemorative-era setting, resulting in a beneficial impact. The following monuments would be relocated to their commemorative-area setting...”

Page 74, line 2: replace the sentence that reads “Other existing representative examples...” with the following sentence:

“Other existing representative examples of the Mission 66 period include the Quarry Visitor Center at Dinosaur National Monument, the Wright Brothers National Memorial Visitor Center, the Beaver Meadows Visitor Center, and the Painted Desert Community at Petrified Forest National Park, which is also a Mission 66 design of Richard Neutra.”

Page 80, second paragraph, first sentence: revise to read

“...8.4 acres beyond the Cyclorama footprint if Move Corridor 1 is used or across a work area that extends 5.6 acres beyond the Cyclorama footprint if Move Corridor 2 is used.”

Page 87, third paragraph, sixth line: revise to read “...be returned to their commemorative-era positions.”

Page 92, first paragraph: add third sentence to read “...alternative. In some cases, local data was not available and county-wide data was used to estimate local economic impacts.”

Page 97, first paragraph, sixth line: revise to read “...be returned to their commemorative-era positions.”

Bibliography: Add the following references to the bibliography list in the EA:

Ballard, David

1986 Leister Barn, Hand drawn plans illustrating removal of drop inlet and installation of new drainage patterns around Leister Barn, July 1986. This includes meeting notes entitled “Leister Orchard Replanting Plan Meeting, 1986.”

Engle, Reed

1985 *Historic Structure Report: Physical Fabric Section, Leister Barn, Gettysburg National Military Park, Gettysburg, Pennsylvania*. USDI, NPS, Office of Cultural Resource Management, Mid-Atlantic Region.

Souder, Norman M.

1965 *Historic Structures Report, Part II, Architectural Data Section on Meade's Headquarters, Gettysburg National Military Park, April 1965*. USDI, NPS Eastern Office, Design and Construction, Division of Architecture.

Tourism Economics (an Oxford Economics Company)

- 2012 The Economic Impact of Travel and Tourism in Pennsylvania: Tourism Satellite Account, Calendar Year 2010.  
([http://cdn.visitpa.com/sites/visitpa.com/files/PA%20Travel%20Industry%20Economic%20Impact%202010%20-FINAL\\_Feb2012\\_0.pdf](http://cdn.visitpa.com/sites/visitpa.com/files/PA%20Travel%20Industry%20Economic%20Impact%202010%20-FINAL_Feb2012_0.pdf))