



Draft General Management Plan and Environmental Impact Statement Valley Forge National Historical Park King of Prussia, Pennsylvania

January 2007

This Draft General Management Plan/Environmental Impact Statement (GMP/EIS) presents three alternatives for the future management of Valley Forge National Historical Park (NHP). Alternative A, the No-Action Alternative, assumes continuation of current policies and associated actions. It retains the management direction of the 1982 GMP and reflects current conditions. Some initiatives already underway, such as rehabilitation of the Valley Forge Train Station by the National Park Service (NPS) and construction of the River Crossing Complex by the Pennsylvania Department of Transportation (PennDOT), are reflected in this alternative. The action alternatives, B and C, would enhance the management and preservation of the park's cultural and natural resources, while providing new opportunities for visitors. Alternative B would provide an exciting palette of new options for visitors to tailor visits and experiences to best meet their own needs and interests. Experiences would focus on exploration and selfdiscovery of the full cultural and natural history of Valley Forge. Excellent orientation, as well as the use of new technologies, would be the key to this approach. Alternative C (the NPS Preferred Alternative) would provide visitors the opportunity to decide the kind of experience they want, depending on learning style, interest, and time. The park would provide a core message and experience for all visitors that are primarily immersive and focus on the encampment and the American Revolution. A self-discovery approach would illustrate additional areas of the park, as well as historical and natural resource themes and topics.

Environmental impacts that would result from implementation of the alternatives are addressed in this document. Impact topics include: cultural resources, physical and natural resources, visitor use and experience, socioeconomic environment, transportation and site access, and park operations and facilities.

This Draft GMP/EIS will be on public and agency review for 60 days. If you wish to comment on the document, you may mail comments to the name and address listed below or you may post them electronically at http://parkplanning.nps.gov. It is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety.

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Executive Summary

Introduction

The 1777-78 winter encampment of General George Washington's Continental Army at Valley Forge is one of the most famous episodes of the American Revolution. The significance of the encampment lies not only in its fact-based history but also in its storied myth. The mythical narrative is important because it reveals something about our character in the heroic way we wish the Revolution to be remembered: an inspiring story of triumph through sacrifice. As both a historic site and a memorial, Valley Forge is a place that is essential to understanding and commemorating the founding principles of the nation. This *Draft General Management Plan/Environmental Impact Statement* (GMP/EIS) presents alternatives for the future management of Valley Forge National Historical Park (NHP), a special place in American history.

Purpose of and Need for Action

Since the beginning of the planning process for this GMP/EIS, the park and its planning team have reached out to stakeholders, including the general public, interested individuals, local governments, organizations, and agencies, for assistance in determining the scope of issues that should be addressed.

Conditions in and around Valley Forge NHP have changed markedly since 1976, when it was transferred from the commonwealth of Pennsylvania to the national park system. The immediate surroundings have been fully developed, growing into the most traffic-choked area in the state, and causing daily conflicts in and around the park. The build-out of the region has left the park as one of the few large, regional natural areas, heightening its value as both open space for people and also an important refuge for plants and animals. The increasing population – a 23% increase in Chester and Montgomery Counties since 1980 – has resulted in greater recreational pressure on the park. The planning process for this GMP has engaged the NPS and surrounding communities in understanding the change and cooperating on common goals in managing that change.

Within the park, management has grown more challenging. Years of flat budgets (an annual compound growth rate of -0.54% since 1985) have resulted in fewer staff and less funding to care for all historic structures. Not all visitors have the opportunity to take part in interpretive programs and many are confused by the park landscape itself, in which the historic conditions are obscured. Recreational visitors find too little information or interpretation of the park's stories and resources. Invasive plants choke out native species within the forests and meadows. White-tailed deer are abundant in the region and prevent forest regeneration in the park. As a result of this GMP process and other reviews, however, the park already has initiated new ways of doing business to address some of these shortfalls. This GMP identifies additional strategies for preserving resources and enhancing their conditions to the highest degree possible, as well as strategies for providing rewarding visitor experiences to all visitors.

The public, stakeholders, the interdisciplinary GMP team, and the park's staff raised many issues and identified opportunities that were considered as part of this planning process. Through public meetings, briefings, newsletters, and the park website, planning goals, issues, and concerns were discussed with the public and with other government agencies. (A summary of the public process is included in Chapter 5: Consultation and Coordination. Appendix B provides relevant correspondence, and Appendix C lists the public comments received during scoping.) The issues and opportunities that reflect divergent points of view are summarized below as decision points and are the basis upon which alternative management strategies were developed. (Mission Goal 3: Strengthen and Preserve Natural and Cultural Resources and Enhance Recreational Opportunities Managed by Partners does not apply at Valley Forge NHP, so decision points related to partnerships are addressed under Mission Goals 1, 2, and 4.)

Decisions Related to Mission Goal 1: Preserve Park Resources

How can the park's cultural and natural resources most effectively be maintained, preserved, and/or restored?

- What are the most appropriate management and use of the park's historic buildings?
- To what extent should the cultural landscape be restored, or are other means used to commemorate and depict important historic views and landscapes?
- How can the park's collections and archives best be protected and maintained?
- To what extent should the park manage its natural resources so that they are restored to a healthy ecological balance?
- Should park meadows continue to be managed as an interpretive landscape or should management for their habitat value be considered?
- Most park surface waters originate well beyond park boundaries. Should waters within the park be managed through a watershed approach (i.e., involvement with outside partners) or through park-wide applied techniques?
- What is the best way to manage the former impounding basins?

Decisions Related to Mission Goal 2: Provide for Public Use, Enjoyment, and Experience of the Park

What are the best ways to provide excellent experiences for all types of visitors, while avoiding adverse impacts to cultural and natural resources?

- What are the most appropriate and effective interpretive experiences parkwide?
- To what degree should an interpretive experience be provided to all visitors?

- What types of visitor facilities are appropriate in order to provide for education in the park?
- What level and types of visitor uses and facilities are appropriate in order to provide for and manage recreational demand without damage to the cultural and natural resources of the park?
- To what degree can the impacts of heavy commuter traffic in the park be lessened while still providing appropriate access for visitors and facilitating better traffic conditions around the park?
- What are the most effective means to provide visitor access to the north side of the park, while protecting cultural and natural resources?

Decisions Related to Mission Goal 4: Ensure Organizational Effectiveness

To what level should the park further its partnerships and cooperative actions to better protect and interpret park resources and values?

- What is the appropriate role of fees and earned income in funding resource preservation and interpretive services, and allowing cost recovery for public use of the park?
- What are the most effective uses of partnerships in achieving the park's mission?

Alternatives

Three elements served as the building blocks for developing each of the alternatives.

1) The **management framework** is based on the park's purpose, mission, and mission goals. 2) The **interpretive and thematic framework** comprises goals for the visitor's experience in the park. 3) The **transportation framework** includes a package of possible solutions to address traffic issues.

Three alternatives are proposed, including a no-action alternative that is a baseline for comparison, and two action alternatives. The alternatives are each defined by a set of management objectives that identify the conditions to be attained. (See Table 2-3 for a summary of the objectives.) Potential actions related to the management objectives are also proposed for each alternative.

No-Action Alternative: Alternative A

The No-Action Alternative assumes continuation of current policies and associated actions. It retains the management direction of the 1982 GMP and reflects current conditions. Some initiatives that are already underway, such as rehabilitation of the Valley Forge Train Station by the NPS, and construction of the River Crossing Complex by the Pennsylvania Department of Transportation (PennDOT), are reflected in this alternative.

The visitor experience would be unchanged, and would comprise self-guided travel through a landscape that is difficult to understand and that has few interpretive exhibits or programs.

The cultural landscape would be unchanged and would continue to largely reflect the state-park commemorative period on the south side and a modern agricultural and old-field landscape on the north side.

Natural resources would continue to be minimally managed.

No new traffic congestion management initiatives would be undertaken.

Staff responsibilities for meeting the park mission of preservation and interpretation would remain as is. No new partnership initiatives would be undertaken.

Capital investments for Alternative A would cost \$54,527,000. This number includes Fiscal Year (FY) 2006 funded projects and all deferred maintenance projects.

Action Alternatives

The concepts for the two action alternatives are based on differing interpretive philosophies and on differing emphases and means to interpret the park themes. The varying interpretive approaches also trigger varying approaches to management and preservation of the park's cultural landscape, ranging from preservation as is to rehabilitation of certain areas to 18th century conditions. Means to manage vehicular traffic circulation variously include such measures as traffic calming, road closures, alternative transportation, and/or a new highway interchange.

Many key objectives are found in both action alternatives. Each would meet the park's fundamental mission of preservation and interpretation of its outstanding resources for use and enjoyment now and in the future.

The action alternatives are based on a new understanding of current and potential visitors and of visitation patterns. Although the interpretive approaches are different, each would dramatically improve the visitor experience over the current condition.

Each action alternative would open more historic buildings to visitor use and would utilize new authorities to lease park buildings to outside tenants in order to bring in new resources for preservation.

The action alternatives also are based on a much better understanding of the value of the park's natural resources. The alternatives are similar to each other in proposing that the park's biological resources be managed in order to preserve and restore the natural abundances, diversities, dynamics, and distributions of native plants and animals.

Each action alternative proposes the establishment of a system of trails, including connections to regional trails.

In the deployment of staff, the park would move away from the traditional model in which NPS employees themselves implement all objectives, to a model in which NPS employees take on the role of facilitator. In this model, the park could more effectively take advantage of abundant outside resources such as volunteers, partners, and grants. Rather than "doing it by ourselves," each staff member would be enabled to multiply his effort through outreach.

Alternative B

Alternative B would provide an exciting palette of new options for visitors to tailor visits and experiences to best meet their own needs and interests. Experiences would focus on exploration and self-discovery of the full cultural and natural history of Valley Forge. Excellent orientation, as well as the use of new technologies, would be the key to this approach.

The historic landscape would be preserved as is, and the park would be respected as a memorial landscape that has been commemorated in many ways over generations. "Layers" from all periods would be sustained and actively interpreted through the use of technology and multimedia.

The health of the forests and meadows would be enhanced through active environmental restoration.

Through-traffic on public roads would be calmed, in partnership with state and local government. Commuters would continue to use public roads, and visitors would continue to use automobiles on the tour route to access various sites throughout the park.

To further achieve the park mission of preservation and interpretation, park staff would be enabled to facilitate engagement of the community in the mission. Existing partnerships would be strengthened, and new partnerships would be actively pursued.

Capital investments under Alternative B (in addition to those listed for Alternative A) would range from \$31,218,000 to \$43,295,000. These additional investments have the potential to be funded through partnerships or through shared funding with other governmental agencies; therefore, the full costs would not be borne by the NPS. Actions directed by GMPs or in subsequent implementation plans are accomplished over time. Budget restrictions, requirements for additional data or regulatory compliance, and competing national park system priorities prevent the immediate implementation of many actions. Major or especially costly actions could be implemented 10 or more years into the future, or may not be realized.

Alternative C: NPS Preferred

Alternative C is both the Environmentally Preferred Alternative and the NPS Preferred Alternative.

Under this alternative, visitors would have the opportunity to decide the kind of experience they want, depending on learning style, interest, and time. The park would provide a core message and experience for all visitors that are primarily immersive and focus on the encampment and the American Revolution. A selfdiscovery approach would illustrate additional areas of the park, and historic and natural resource themes and topics. Excellent orientation, as well as excellent programming, would be the keys to this approach.

The landscape of the core interpretive focus areas would evoke the 18th century. Some historic views would be rehabilitated to facilitate interpretation. Most areas of the park would be preserved as is.

The health of the forests and meadows would be enhanced through active environmental restoration.

Through-traffic on public roads would be calmed, in partnership with state and local government. To enhance the visitor experience, some roads in the park would be closed to through- and visitor-traffic. Visitors could use a shuttle or walk or bike.

To further achieve the park mission of preservation and interpretation, park staff would be enabled to facilitate engagement of the community in the mission. Existing partnerships would be strengthened, and new partnerships would be actively pursued.

Capital investments under Alternative C (in addition to those listed for Alternative A) would range from \$61,321,000 to \$85,044,000. These additional investments have the potential to be funded through partnerships or through shared funding with other governmental agencies; therefore, the full costs would not be borne by the NPS. Actions directed by GMPs or in subsequent implementation plans are accomplished over time. Budget restrictions, requirements for additional data or regulatory compliance, and competing national park system priorities prevent the immediate implementation of many actions. Major or especially costly actions could be implemented 10 or more years into the future, or may not be realized.

Environmental Consequences

The alternatives presented in this Draft GMP/EIS establish management objectives and propose potential actions that may occur as a result of those objectives. The general nature of the management objectives and potential actions dictates that the analysis of impacts also be general. Where possible, specific impacts have been identified; however, the majority of this environmental analysis is programmatic in nature and further environmental compliance (including both National Environmental Policy Act [NEPA] and Section 106 of the National Historic Preservation Act of 1966 [NHPA]) may be required as actions are implemented. A general summary of key impacts is provided below. Detailed impacts are presented in Chapter 4: Environmental Consequences.

Alternative A: No-Action Alternative

Because Alternative A would continue the present management objectives for cultural and natural resources, historic structures, cultural landscape patterns, surface waters, floodplains, vegetation and wildlife, and lightscapes would continue to be adversely impacted. Damage to and/or loss of these resources would be imminent.

The lack of interpretation and a defined visitor experience would continue to adversely affect visitor experience, understanding, and use of the site.

Because no new traffic congestion management initiatives would be implemented, heavy through-traffic within the park would continue to interfere with visitor use and experience and adversely affect cultural and natural resources.

Impacts to park operations and facilities would be moderate and adverse, as no new partnership initiatives would be undertaken. Park facilities could continue to deteriorate through deferred maintenance. Preservation and interpretive initiatives could also be hindered, as additional staffing (from partners and volunteers) and funding diminished.

Alternative B

Alternative B would enhance the park's ability to manage cultural resources by stabilizing, preserving, and rehabilitating historic structures, as well as preserving the small-scale and major features within the cultural landscape; an overall longterm, beneficial impact to these resources.

For natural resources, the health of the forests and meadows, as well as the wildlife that inhabit these areas, would be enhanced through active management and environmental restoration. Over the long-term, diversity would improve, resulting in a major beneficial impact to vegetation and wildlife. Geologic resources, water resources, floodplains, air quality, soundscapes, and lightscapes would all be impacted beneficially through improved resource management and cooperation with partners to minimize outside, adverse impacts on these resources.

The visitor experience would be beneficially impacted due to new interpretive options, improved orientation, and the use of technology. The calming of throughtraffic on public roads within the park would beneficially impact visitor safety and lead to a better visitor experience.

Impacts to park operations and facilities would be adverse in the short-term; however, as partnerships and volunteer opportunities were actively pursued, the overall impact would be major and beneficial. Volunteers and partners would further preservation and interpretive initiatives, and park staff and funding could be focused where it is needed.

Alternative C: NPS Preferred

Alternative C would include similar beneficial impacts as described for Alternative B. However, Alternative C would also include additional beneficial impacts to cultural landscapes, topography, visitor use and experience, and transportation and site access.

In Alternative C, the cultural landscape of two interpretive focus areas (Grand Parade and Muhlenberg's Brigade) would be rehabilitated to 18th century conditions, and the quarries within the Grand Parade (except Cave Quarry) would be filled to their historic elevations. This would benefit not only the cultural landscape but also visitor understanding and experience of this resource.

Visitor experience would further be enhanced under Alternative C through the rehabilitation of historic views between Redoubts 1, 2, 3, and 4 and Stony Battery to Star Fort. Visitors would also have more options for exploration of the site, with the combination of self-discovery/use of technology at some interpretive areas, as well as the immersive experiences offered at the Grand Parade, Muhlenberg's Brigade, and Washington's Headquarters. The closure of some public roads to visitor and through-traffic would beneficially impact resources as well as the visitor experience and visitor access to sites would also be enhanced through the use of a shuttle.

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