
Chapter 4: Environmental Assessment

1 Introduction/Purpose and 2 Need

3 Perry's Victory and International Peace Memorial
4 is a fitting tribute to both a pivotal U.S. naval
5 victory in the War of 1812 and a lasting peace
6 between former enemies. The Memorial consists
7 of a 352-foot high column on South Bass Island in
8 Lake Erie, surrounded by 25 acres of landscape
9 grounds. Visible for miles, it stands as a reminder
10 not only of the events of the War of 1812, but also
11 as a symbol of international peace between Great
12 Britain, Canada, and the United States.

13 The National Park Service (NPS) is considering a
14 series of actions in association with the treatment
15 recommendations developed in the Cultural
16 Landscape Treatment Plan (CLTP) for Perry's
17 Victory and International Peace Memorial. The
18 Cultural Landscape Treatment Plan was prepared
19 to provide park staff with a long-term vision for
20 protecting, managing, sustaining, and interpreting
21 the designed historic landscape and guidance on
22 integrating the cultural landscape with the visitor
23 experience.

24 The Environmental Assessment (EA) analyzes the
25 potential impacts and effects resulting from the
26 implementation of the No Action Alternative and
27 three action alternatives for expanding the
28 facilities at Perry's Victory and International Peace
29 Memorial. The NPS has prepared the EA in
30 compliance with: National Environmental Policy
31 Act of 1969, as amended (NEPA); the Council on
32 Environmental Quality (CEQ) regulations
33 implementing NEPA [40 Code of Federal
34 Regulations (CFR) 1500-1508]; the National
35 Historic Preservation Act of 1966, as amended
36 (NHPA); NPS Director's Order-12 (as reflected in

37 the DO-12 Handbook); and Section 106 of the
38 National Historic Preservation Act of 1966 as
39 amended. The NEPA process is being used to
40 comply with Section 106 of the NHPA and the
41 Advisory Council on Historic Preservation's
42 implementing regulations at 36 CFR 800.8 (c).

43 Perry's Victory and International Peace Memorial
44 is a unit of the NPS and therefore, in accordance
45 with the (NEPA) of 1969, the NPS acting as lead
46 federal agency has prepared this EA to identify
47 alternatives and assess the potential impacts of the
48 proposed action. Concurrently, the NPS has been
49 conducting consultation in accordance with
50 Section 106 of the National Historic Preservation
51 Act (NHPA) and Section 7 of the Endangered
52 Species Act of 1973.

53 Purpose and Need

54 The purpose of the proposed project is to:
55 preserve the Memorial and its designed cultural
56 landscape while guiding rehabilitation for
57 enhancing the visitor experience and enjoyment of
58 the landscape through integration of
59 interpretation with the cultural landscape; provide
60 ABAAS accessibility to indoor/outdoor
61 experiences that coincide with the enhanced
62 stewardship of the park's significant cultural and
63 natural resources; and provide a backdrop within a
64 peaceful setting to promote a stronger
65 understanding of and meaningful relationship to
66 the Battle of Lake Erie in 1813 and resultant
67 lessons of international peace.

68 The project is needed to provide a richer and more
69 complete visitor experience of the park through
70 access to the cultural landscape and associated
71 interpretation and to provide additional
72 opportunities for expanded programming

1 integrated within the landscape. Also, the park has
2 accrued features from both planned and
3 extemporaneous decisions in recent years and
4 guidance on intentional preservation, removal or
5 rehabilitation of the designed landscape as a whole
6 is needed.

7 **Objectives**

8 All alternatives identified for detailed analysis
9 must meet objectives to a large degree and resolve
10 the purpose of and need for the action. The
11 following objectives were identified by the
12 planning team:

- 13 ■ Preserve the monument and its designed
14 landscape as fundamental resources and
15 values of the park.
- 16 ■ Preserve the horizontality of the landscape
17 setting, supported by open lawn, upper and
18 lower plazas, and expanses of water
19 surrounding the park - all working together to
20 accentuate the vertical column;
- 21 ■ Integrate architecture and the landscape with
22 plazas; seawalls, sidewalks, and circulation
23 reflecting traditional Beaux Arts style.
- 24 ■ Preserve viewsheds to and from the Memorial;
25 views from a distance while approaching
26 South Bass Island by boat; view of the grounds
27 and Memorial from the eastern end of
28 Gibraltar Island; views of the column from
29 historic grounds; and views from the column
30 to the site of the 1813 Battle of Lake Erie.
- 31 ■ Design specific opportunities for engagement
32 through interaction with—and
33 interpretation—of both cultural and natural
34 landscape features. Implementation of visitor
35 ABAAS standards at the Memorial plazas, the
36 visitor center, and the pedestrian circulation
37 system would be paramount for expanded
38 visitor opportunities.
- 39 ■ Establish compatible spatial transitions
40 between the surrounding community and the
41 Memorial. Provide for guidance in managing
42 viewsheds and spatial definitions, and the

43 character of gradual or defined perimeters
44 between the park and adjacent
45 neighborhoods;

- 46 ■ Provide better integration of sidewalks
47 connecting the designed landscape to the
48 surrounding community;
- 49 ■ Examine methods to achieve sustainability
50 goals for lighting and landscape maintenance.
- 51 ■ Coordinate the plaza and column
52 rehabilitation projects with vegetation
53 replacement in the vicinity of the existing
54 Austrian Pines. These trees will be lost during
55 the rehabilitation project.
- 56 ■ Apply a consistent and intentional approach to
57 design and maintenance, given that the site
58 presents inconsistent application of materials
59 such as concrete, brass and vegetation.

60 **Relationship to Park Planning** 61 **Efforts**

62 This plan fulfills a park priority for resource
63 management and visitor experience at Perry's
64 Victory and International Peace Memorial and
65 serves as a component of the park's planning
66 portfolio. This follows the NPS's "Planning
67 Portfolio" construct, consisting of a compilation of
68 individual plans, studies, and inventories, which
69 together guide park decision making. The
70 planning portfolio enables the use of targeted
71 planning products (such as this one) to meet a
72 broad range of park planning needs, a change from
73 the previous NPS focus on stand-alone general
74 management plans. The planning team relied on
75 the park's previous planning and masterplan
76 concept designs for guidance in developing the
77 alternatives. Documents include: *Cultural*
78 *Landscape Report for Perry's Victory and*
79 *International Peace Memorial* (1994); *Cultural*
80 *Landscape Inventory* (2011); *Long Range*
81 *Interpretive Plan* (2012); *Foundation Document*
82 (2012); *National Register of Historic Places*
83 *Nomination (Updated)* (2014); *Development*
84 *Concept Revision* (1992); *Design Development –*
85 *Approach Mall* (1994); and *Visitor Center*
86 *Construction Drawings* (2000). Combined, these

1 documents provide Perry's Victory and
 2 International Peace Memorial with a vision and
 3 clear direction for sustained long-term
 4 management and interpretation, and preservation
 5 of the overall character and historic features of the
 6 designed landscape with priorities on natural and
 7 cultural resource conditions and visitor use and
 8 experience. Recommendations in the Cultural
 9 Landscape Treatment Plan were developed in
 10 conjunction with the development of the
 11 alternatives to be evaluated in the EA. The
 12 treatment recommendations informed the
 13 development of the alternatives and aided in
 14 decisions on actions that were common to the
 15 alternatives.

16 **Park Background**

17 Perry's Victory and International Peace Memorial
 18 consists of a 352-foot high column on South Bass
 19 Island in Lake Erie surrounded by 25 acres of
 20 landscaped grounds. It is approximately eight
 21 miles northeast of Port Clinton, Ohio (Figure 4-1).
 22 Visible for miles, it stands as a reminder not only
 23 of the events of the War of 1812, but also as a
 24 symbol of international peace between Great
 25 Britain, Canada, and the United States. The
 26 Memorial was built by a nine-state commission
 27 with matching federal funds between 1912 and
 28 1915. Twenty-one years after it was built, Congress
 29 charged the NPS to preserve and manage the
 30 Memorial.

31 The Memorial site straddles a narrow isthmus
 32 about 250 yards wide between the village of Put-
 33 in-Bay to the west and the former agricultural area
 34 to the east. Although devoted to farming and
 35 viticulture in the past, much of the island has been
 36 converted to summer housing and resorts. The
 37 Memorial grounds divide the residential and
 38 commercial areas of the village from the less
 39 populated and largely residential east end of South
 40 Bass Island.

41 When assembled from the various properties of
 42 individual landholders in 1911–1912, the Perry's
 43 Victory and International Peace Memorial site
 44 encompassed 14.25 acres. After the NPS acquired
 45 the property and designated it a National
 46 Monument, the boundaries of the site changed.

47 The National Park Service added acreage to the
 48 east and west of the Memorial beginning in 1959.
 49 They also moved the location of part of the south
 50 seawall farther south in 1977–1978 and removed
 51 most of the road that formed the original western
 52 boundary in 2001–2002. Historically, the
 53 boundaries included: Chapman Avenue on the
 54 west side (no longer existing); seawalls to the
 55 north and south, and a slight ridge to the east,
 56 formed by the topography and defined by large
 57 tree plantings. Most development of the island in
 58 recent years consists of summer homes west of the
 59 village, and minimal construction east of the park.
 60 NPS erected a maintenance building and summer
 61 residences for staff along the eastern edge of the
 62 park and beyond the original site boundaries.
 63 These buildings are slightly screened from the
 64 Memorial by tree plantings that mark the original
 65 property line.

66 **Park Significance**

67 Park significance statements express why park
 68 resources and values are important enough to
 69 warrant national park designation. Statements of
 70 the park's significance describe why an area is
 71 important within a global, national, regional, and
 72 systemwide context. These statements are directly
 73 linked to the purpose of the park and are
 74 substantiated by data or consensus. They reflect
 75 the most current scientific or scholarly inquiry and
 76 cultural perceptions which may have changed
 77 since the park's establishment.

78 Perry's Victory and International Peace Memorial
 79 is significant because:

- 80 ■ The battle, fought between American and
 81 British naval forces, was a decisive American
 82 victory in the War of 1812 for forces under the
 83 command of Oliver Hazard Perry, who
 84 launched the battle from the strategic safe
 85 harbor at South Bass Island.
- 86 ■ The victory precipitated events with both
 87 personal consequences for individuals
 88 involved in the battle and far-reaching results
 89 for nations involved in the War of 1812-
 90 settlement patterns. American Indian tribes
 91 including the Wyandots, Delaware, Ottawa

1 and Miami were forced westward across the
2 Mississippi River making way for territorial
3 expansion. Tecumseh, the Native American
4 Shawnee warrior and his confederacy of tribes
5 sided with the British in the War of 1812. After

6 the United States took control, as peace was
7 achieved through the Treaty of Ghent, the
8 British and their Indian allies retreated to
9 upper Canada.



Figure 4-1: Project Boundary for Perry's Victory and International Peace Memorial within the context of Lake Erie and northern Ohio.

1 ■ The Memorial serves as a symbol of
 2 international peace and a constant reminder of
 3 the ongoing cooperation between former
 4 enemies. It was an engineering marvel of its
 5 time and an architectural statement to
 6 memorialize the battle as well as the centennial
 7 of lasting peace between Great Britain,
 8 Canada, and the United States of America.
 9 Commissioned by nine states including Ohio,
 10 Michigan, Pennsylvania, Illinois, Wisconsin,
 11 New York, Kentucky, Massachusetts, and
 12 Rhode Island, and located on South Bass
 13 Island, the location is symbolic for being
 14 within sight of the undefended border
 15 (Figures 4-2 and 4-3).

16 ■ The Memorial is also significant because it
 17 serves as a tomb for 3 American officers and 3
 18 British officers killed in the Battle of Lake Erie
 19 on September 10, 1813. Their remains lie in
 20 the domed room at the center of the base of
 21 the column. They were originally located
 22 where the Village of Put-In-Bay is now located
 23 but were removed and interred in the crypt at
 24 the Memorial on September 11, 1913.

25 ■ The lasting results of peace symbolized by
 26 disarmament and arbitration.

27 ■ The memorial offers the ability to interpret
 28 war from multiple perspectives ¹

29 The park’s significance, and management
 30 objectives are not linked to the impairment
 31 findings. Management actions and projects are
 32 subject to review through the NEPA process to
 33 assess potential impacts to natural and cultural
 34 resources.

35 **Public Process**

36 An internal scoping meeting was held at Perry’s
 37 Victory and International Peace Memorial on
 38 October 5-6, 2016, and included NPS Midwest
 39 Region staff, park staff, and the project team



Figure 4-2: Panoramic views are available from the observation deck of the Memorial column. This viewshed is critical to understanding the Battle of Lake Erie in 1813.



Figure 4-3: Orientation maps are provided on the observation deck of the column to help interpret the views and the significance of the battle.

40 members from Commonwealth Heritage Group,
 41 Inc. (CHG) and Wiss, Janney, Elstner, Inc. (WJE).
 42 The meeting focused on development of the
 43 *Comparative Analysis (CA)* and the *Cultural*
 44 *Landscape Treatment Plan (CLTP)* and associated
 45 *Environmental Assessment (EA)*. Stakeholder
 46 groups were identified in the meeting and all
 47 identified received invitations to scheduled open
 48 house meetings and the formal public meeting for
 49 review of the design concept alternatives and the
 50 draft CLTP/EA.

51 A public open house was held on October 6, 2016
 52 to introduce the CLTP/EA project to residents of
 53 South Bass Island, park staff, and interested

1 ¹ *Perry’s Victory and International Peace Memorial Foundation Document*, National Park Service, Department of the Interior, October 2012, 3-5.

1 stakeholders. The project was presented by the
2 Superintendent and the planning team was
3 introduced. Goals and objectives of the project
4 were presented and participants expressed various
5 concerns about effects of the project on natural
6 resources and on the condition of the village
7 beach, located south of the park and adjacent to
8 the south seawall.

9 An internal planning workshop with park staff and
10 the planning team was held on May 16, 2017.
11 Goals were to review progress on the CLTP/EA,
12 develop alternative design concept plans, and
13 formulate further specific goals and objectives for
14 the project. A second public open house was held
15 the day after the workshop to present conceptual
16 alternatives and gain feedback for use in
17 subsequent planning and design. The public had
18 an additional avenue of participation through a
19 public open house on October 25, 2017. This
20 meeting gave stakeholders and staff an
21 opportunity to see developed concept design
22 alternatives. Comments and suggestions were
23 incorporated into the draft CLTP/EA based on
24 public input. The next submission of the
25 document will be for public review on the NPS
26 Planning, Environment, and Public Comment
27 (PECP) system website. After a 30-day review, all
28 comments will be analyzed, and any revisions
29 deemed necessary will be made and incorporated
30 into the final document.

31 Informal consultation with U.S. Fish and Wildlife
32 Service, Ohio Field Office and the State Historic
33 Preservation Officer was initiated on January 13,
34 2017. Letters were sent from the park to both
35 agencies, serving as notification that the park had
36 begun the NEPA process and was proposing to
37 have an EA available for public and regulatory
38 review in the fall of 2017.

39 **Impact Topics**

40 **Impact Topics Retained for Analysis**

41 Impact topics are the resources of concern that
42 may be affected by the range of alternatives
43 reviewed in the EA. Impact topics were identified
44 to ensure alternative comparisons were based on
45 the most relevant issues. Impact topics are derived
46 from issues raised during scoping and from NPS

47 guidelines concerning topics that should be taken
48 under consideration when conducting NEPA and
49 Section 106 analysis.

50 The following impact topics were retained for
51 further analysis: soils and geology; water
52 resources/floodplains; vegetation; wildlife;
53 threatened and endangered species; historic
54 buildings and structures; cultural landscapes;
55 historic viewsheds; visitor use and experience; and
56 human health and safety. A brief rationale for the
57 selection of each impact topic is provided and each
58 impact topic is discussed in detail in the Affected
59 Environment section.

60 **Soils and Geology.** The NPS actively seeks to
61 understand and preserve the soil resources of
62 parks, and to prevent to the extent possible, the
63 erosion, physical removal or contamination of the
64 soil or its contamination of other resources. There
65 is potential for soils disturbances from the
66 implementation of the alternatives. Therefore, this
67 topic was retained for further analysis.

68 **Water Resources and Floodplains.** Due to the
69 location of the park on South Bass Island, storms
70 and subsequent flooding have periodic effects on
71 the landscape and historic features. The watershed
72 hydrology can be further affected by
73 implementation of the alternatives. Therefore, this
74 topic was retained for further analysis.

75 **Vegetation.** Vegetation disturbance would
76 occur and the introduction of more invasive non-
77 native species is possible from activities
78 implemented in the alternatives. Therefore, this
79 topic was retained for further analysis.

80 **Wildlife.** The landscape and vegetation of the
81 park supports a variety of birds, small mammals,
82 and reptiles. Disturbances from the
83 implementation of the preferred alternative would
84 impact some species and their potential habitats.
85 Therefore, this topic was retained for further
86 analysis.

87 **Threatened and Endangered Species.**
88 Species of concern (flora and fauna) are present at
89 the park. Disturbances due to the implementation
90 of the alternatives would impact critical species on

1 the site and within the site’s regional context.
 2 Therefore, this topic was retained for further
 3 analysis.

4 **Historic Buildings and Structures.** The future
 5 of historic structures within the landscape of the
 6 park is a key issue in the CLTP. The plan includes
 7 a variety of treatment recommendations and
 8 actions within the alternatives. Therefore, historic
 9 buildings and structures are retained as “cultural
 10 resources for analysis” in the EA.

11 **Cultural Landscapes.** The preservation and
 12 integration of the cultural landscape into the
 13 visitor use and experience of the park and the
 14 interpretation of the landscape are key concerns in
 15 the CLTP, which contains several treatments and
 16 actions. Some actions may require ground
 17 disturbances or removal of vegetation with
 18 potential impacts to the cultural landscape of the
 19 park. Therefore, this topic was retained as
 20 “cultural resources for analysis” in the EA.

21 **Historic Viewsheds.** Management of
 22 established historic viewsheds, critical to the
 23 interpretation of the Battle of 1813 and critical to
 24 the visitor experience of the park, has potential
 25 impact on the site. Therefore, this topic was
 26 retained for further analysis.

27 **Visitor Use and Experience.** The alternatives
 28 would impact overall visitor understanding of the
 29 designed landscape and the stories and themes
 30 essential to understanding the significance of the
 31 park. Therefore, this topic was retained for further
 32 analysis.

33 **Human Health and Safety.** Due to
 34 recommended actions within the alternatives,
 35 visitor use would increase and with it, continual
 36 maintenance and management of facilities to
 37 ensure the safety and welfare of the public.
 38 Therefore, this topic was retained for further
 39 analysis.

40 **Impact Topics Considered and Not** 41 **Retained for Analysis**

42 **Environmental Justice.** Presidential Executive
 43 Order 12898, General Actions to Address

44 Environmental Justice in Minority Populations
 45 and Low-Income Populations, requires all federal
 46 agencies to incorporate environmental justice into
 47 their missions by identifying and addressing the
 48 disproportionately high and/or adverse human
 49 health or environmental effects of their programs
 50 and policies on minorities and low-income
 51 populations and communities. According to the
 52 Environmental Protection Agency, environmental
 53 justice is the fair treatment and meaningful
 54 involvement of all people, regardless of race, color,
 55 national origin, or income, with respect to the
 56 development, implementation, and enforcement
 57 of environmental laws, regulations and policies.
 58 The goal of fair treatment is not to shift risks
 59 among populations, but to identify potentially
 60 disproportionately high and adverse effects and
 61 identify alternatives that may mitigate these
 62 impacts.

63 The Village of Put-in-Bay contains both minority
 64 and low-income populations; however,
 65 environmental justice is dismissed as an impact
 66 topic for the following reasons:

- 67 ▪ Implementation of all alternatives would not
 68 result in any identifiable adverse human health
 69 effects. Therefore, there would be no direct or
 70 indirect adverse effects on any minority or
 71 low- income populations.
- 72 ▪ The impacts associated with implementation
 73 of all alternatives would not
 74 disproportionately affect any minority or low-
 75 income population or community.
- 76 ▪ Implementation of all alternatives would not
 77 result in any identified effects that would be
 78 specific to any minority or low-income
 79 community.
- 80 ▪ The impacts to the socioeconomic
 81 environment resulting from implementation of
 82 any of the action alternatives would be
 83 beneficial. In addition, NPS and the planning
 84 team do not anticipate the impacts on the
 85 socioeconomic environment to alter the
 86 physical and social structure of the nearby
 87 communities.

1 **Ethnographic Resources.** Because no
2 ethnographic resources or traditional cultural
3 properties exist in the areas under consideration in
4 this document, this topic has been dismissed from
5 further analysis.

6 **Indian Trust Resources.** Indian trust resources
7 include tribal lands, assets, resources, and treaty
8 rights. Any anticipated impacts to Indian trust
9 resources that would result from a federal action
10 must be explicitly addressed in environmental
11 documents. There are no Indian trust resources
12 within the boundaries of Perry's Victory and
13 International Peace Memorial. Therefore, this
14 topic has been dismissed from further
15 consideration.

16 **Archeological Resources.** According to the
17 National Register Nomination update (2014) for
18 Perry's Victory and International Peace Memorial,
19 there are no significant archeological sites
20 associated with the historic grounds or within
21 areas outside the historic grounds that may be
22 disturbed by actions proposed within the project.

23 **Museum Collections.** The actions described in
24 the alternative would have no impact on museum
25 collections. Therefore, this topic has been
26 dismissed from further analysis.

27 **Air Quality.** The actions described in the
28 alternative would have no impact on air quality.
29 Therefore, this topic has been dismissed from
30 further analysis.

31 **Water Quality.** The actions described in the
32 alternative would have no impact on water quality.
33 Therefore, this topic has been dismissed from
34 further analysis.

35 **Carbon Footprint.** For the purposes of this
36 planning effort, "carbon footprint" is defined as
37 the sum of all emissions of carbon dioxide and
38 other greenhouse gases, including methane and
39 ozone, that would result from implementation of
40 the action alternative. Understanding the carbon
41 footprint of the alternatives is important for
42 determining contribution to climate change. This
43 impact topic was dismissed from further analysis

44 for several reasons: 1) no changes would occur in
45 the way visitors reach the project area by boat or
46 airplane as a result of the alternatives; 2) the
47 minimal new development proposed in the project
48 area would not noticeably increase greenhouse gas
49 emissions; and 3) newer sustainable building
50 practices should help limit additional greenhouse
51 gas emissions.

52 **Natural Soundscape.** An important part of the
53 NPS mission is preservation of natural
54 soundscapes associated with national park units as
55 indicated in NPS Management Policies, 2006, and
56 Director's Order 47: Sound Preservation and
57 Noise Management. The action alternatives do not
58 introduce additional noise and traffic from visitors
59 and park staff. Because the alternative would not
60 increase noise levels, natural soundscapes was
61 dismissed as an impact topic.

62 **Lightscape.** In accordance with NPS
63 Management Policies, 2006, the NPS strives to
64 preserve natural ambient lightscales, which are
65 natural resources and values that exist in the
66 absence of human-caused light. Lighting of the
67 Memorial column has been part of its history. The
68 action alternative would not increase any use of
69 night lighting, specifically at the visitor center and
70 entrances to the park. Therefore, lightscape was
71 dismissed as an impact topic.

72 **Natural or Depletable Energy Resource**
73 **Requirements and Conservation Potential.**
74 In accordance with NPS Management policies,
75 2006, and Executive Orders 12873 and 12902,
76 there are requirements in everything the NPS does
77 that will have some small affect in improving our
78 environmental footprint (green buying and
79 sustainable building materials, etc.). However,
80 individual changes at Perry's Victory and
81 International Peace Memorial are unlikely to have
82 adverse impacts to the wider universe of energy
83 use and depletable resources. Therefore, this
84 impact topic was dismissed from further analysis.

85 **Development of Alternatives**

86 The NEPA process consists of evaluating the
87 environmental effects of a federal undertaking,

1 which is presented as a series of at least two
 2 alternative actions. This section describes
 3 proposed alternatives that respond to the purpose
 4 and need of the project. Three alternatives were
 5 evaluated: Alternative 1: No Action; Alternative 2:
 6 Curvilinear Pedestrian Circulation and Integration
 7 of the Historic Designed Landscape; and
 8 Alternative 3: Rectilinear Pedestrian Circulation
 9 Maintained with Existing and Proposed
 10 Connecting Walkways and Visitor Nodes.

11 **Alternative 1 (No Action):** Alternative 1 preserves
 12 and maintains existing conditions at the park.
 13 Within this alternative current management
 14 strategies would remain the same and there would
 15 be no addition of facilities or expanded
 16 interpretation in association with the cultural
 17 landscape.

18 **Alternatives 2 and 3 (Action Alternatives):** The
 19 proposed design concept alternatives are intended
 20 to address issues, challenges/opportunities, goals
 21 and objectives outlined in previous park planning
 22 documents and identified by park staff through
 23 workshops and discussions, NPS communications,
 24 and from the project scope. Meetings and
 25 workshops with park staff were instrumental in
 26 the decision-making process and included specific
 27 goals and objectives for a comprehensive vision
 28 for the design and management of the park for the
 29 next 20 years. The action alternatives have
 30 common goals and objectives but contrasting
 31 implementation strategies. Public input received
 32 during scoping was important in the development
 33 of the alternatives. This process helped the
 34 planning team understand the public's values and
 35 preferences regarding visitor experiences in the
 36 park and their concerns, issues, and suggestions
 37 related to accessibility, quality of the visitor
 38 experience, vegetation management, protection of
 39 cultural and natural resources, and the condition
 40 of the adjacent village beach.

41 **The No Action Alternative**

42 **Preserve Existing Conditions and Continue** 43 **Current Management Strategies**

44 *Refer to Figure 4-4: Alternative 1*

45 **Alternative 1** would reflect continuation of
 46 current practices with no improvements for visitor
 47 accommodation and accessibility. The following
 48 are challenges related to existing conditions in the
 49 park based on discussions and comments from
 50 park staff.

- 51 ■ There is no clear sense of entry and
 52 orientation as visitors arrive at the park.
- 53 ■ Visitor center precinct and the pedestrian
 54 circulation system has limited compliance with
 55 Architectural Barriers Act Accessibility
 56 Standards (ABAAS).
- 57 ■ Restrooms are partially accessible and the
 58 pedestrian route that leads to the restrooms
 59 from parking north of the Memorial is not in
 60 compliance with ABAAS standards. Compliant
 61 accessibility does not include using parking
 62 areas or roads to substitute for accessible
 63 circulation.
- 64 ■ The Memorial plazas and column are not
 65 compliant with ABAAS standards.
 66 Programmatic accessibility is not provided
 67 near the Memorial and is limited at the visitor
 68 center (Figures 4-5 and 4-6).



Figure 4-5: Small staircases are the only pedestrian access to the lower plaza. The grand ceremonial steps are the only access to the upper plaza. There is no ABAAS accessibility for the plazas.



Figure 4-6: View from the north seawall clearly shows the barriers to ABAAS accessibility to the Memorial and plazas.



Figure 4-7: Definition of enclosed space is diminished east of the Memorial at the edge of the historic core and the park housing/administration management zone.

- 1 ▪ A Black powder magazine is located in close
2 proximity to occupied buildings and a
3 propane tank. This location is not compliant
4 with regulations governing the storage of black
5 powder.
- 6 ▪ The park’s landscape maintenance program is
7 limited to a seasonal gardener position.
- 8 ▪ Spatial patterns defining the historic landscape
9 are diminished. Openness in the center of the
10 grounds was historically framed by vegetative
11 masses east and west of the historic core
12 (Figures 4-7 and 4-8).
- 13 ▪ There is no clarification of goals for the visitor
14 experience including recreational use of the
15 formal expanse of lawn in the historic core.
- 16 ▪ Replacement paving for the gravel surfacing of
17 the upper plaza remains an issue. Color,
18 textures, patterns, life-cycle costs and material
19 sustainability should be the basis for decision-
20 making as well as original design intent and
21 historic precedent.
- 22 ▪ Above ground utilities and powerlines remain
23 on the site within historic viewsheds.
- 24 ▪ There is no connection to East Point from the
25 park. The current sidewalk north of the
26 Memorial ends at the transition from the
27 historic core management zone to the park
28 housing/maintenance management zone.



Figure 4-8: Definition of enclosed space is diminished west of the Memorial at the edge of the historic core and the visitor access management zone.

- 29 ▪ There is no clear direction or access from the
30 park to the village beach access across
31 Delaware Avenue (Figures 4-9 and 4-10).



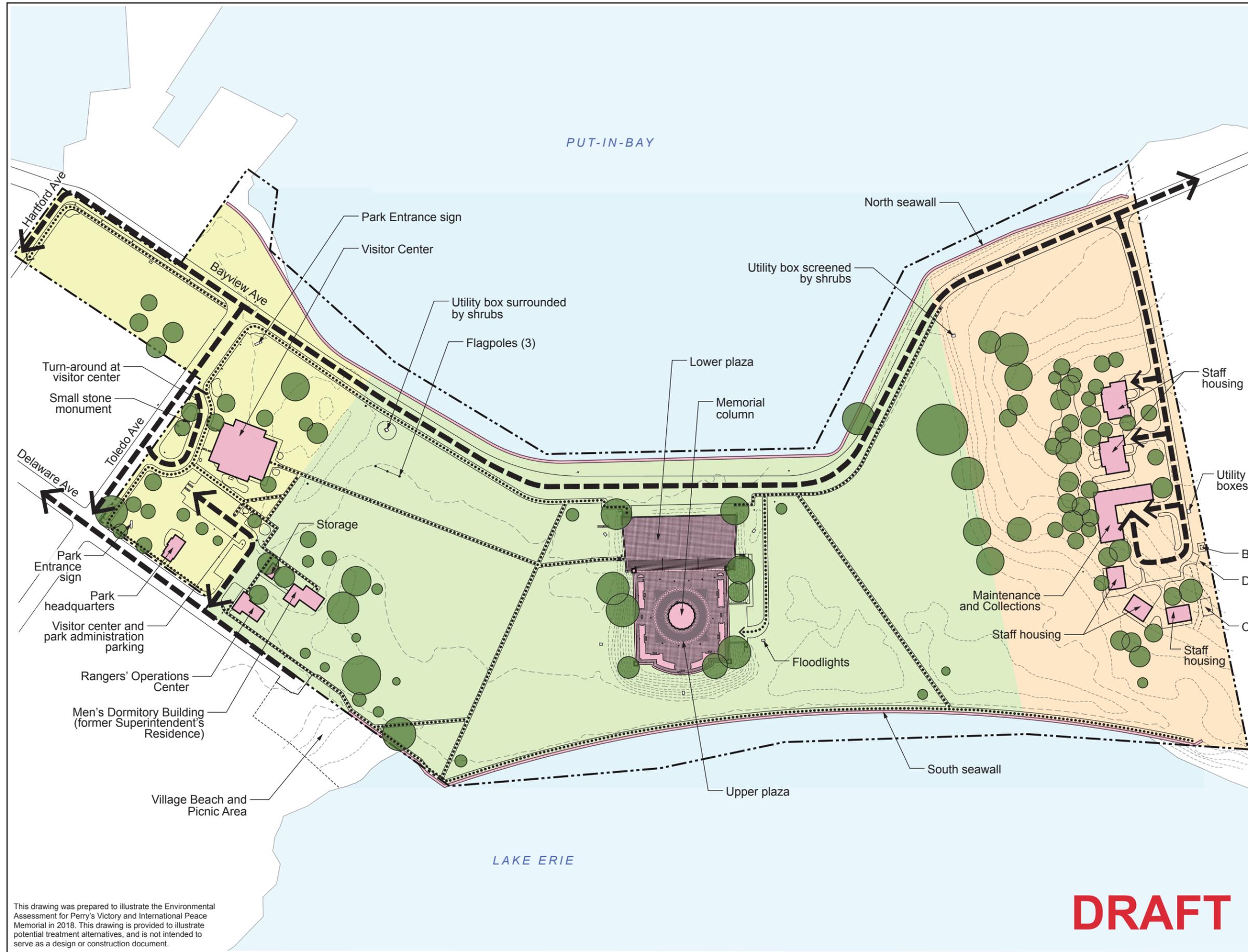
Figure 4-9: The village beach provides the only picnic table amenities around the park.

**Cultural Landscape
Treatment Plan and
Environmental Assessment**

for

**Perry's Victory and
International Peace
Memorial**

February 2018



- Legend**
- Memorial Park Boundary
 - Vehicular circulation
 - Concrete sidewalk
 - 2' Contours
 - Existing buildings
 - Existing structures
 - Existing trees
- Management Zones**
- Historic Core
 - Visitor Access/Park Administration
 - Park Housing/Maintenance

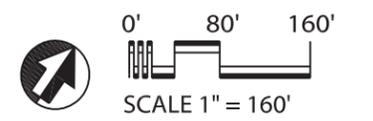


Figure 4-4
Alternative 1
No Action Alternative

DRAFT

This drawing was prepared to illustrate the Environmental Assessment for Perry's Victory and International Peace Memorial in 2018. This drawing is provided to illustrate potential treatment alternatives, and is not intended to serve as a design or construction document.

Data Sources: Base map based on GIS shapefiles provided to the authors by NPS and supplemented through with aerial photography and other NPS maps



Figure 4-10: From within the park there is no clear direction or node along the pedestrian circulation system to define clear access from the park to the beach boardwalk.

1 **Actions Common to Alternatives 2** 2 **and 3 (Action Alternatives)**

3 Within a framework of rehabilitation, the actions
4 within the design concept alternatives possess
5 several commonalities in approach. Significant
6 characteristics of the historic landscape would be
7 preserved while adapting the site to meet
8 contemporary needs and park management
9 objectives. Significant characteristics include:

- 10 ■ **Horizontality of the landscape setting**
11 **which accentuates the vertical column:** The
12 integration of architecture and the formal
13 landscape is characteristic of the Beaux Arts
14 style.
- 15 ■ **Definition of the boundary edges of the**
16 **historic core with tree massings:** Historic
17 core boundary edges (refer to Figure 4-4). The
18 historic core is defined by horizontal expanses
19 of grass lawn, two horizontal plazas, and
20 horizontal expanses of water surfaces north
21 and south of the Memorial. Current tree
22 massings provide a vertical contrast to the
23 topography and a sense of spatial enclosure at
24 the edges of the historic core. The number of
25 trees providing spatial definition have
26 diminished over time.
- 27 ■ **Integration of architecture and landscape**
28 **typical of Beaux Arts style plazas, sidewalks,**
29 **and circulation.**

- 30 ■ **Preservation of viewsheds to and from the**
31 **Memorial:** These include: views from the
32 distance when approaching South Bass Island
33 by boat; views of the grounds and Memorial
34 from the eastern end of Gibraltar Island; views
35 of the column from within the park; and views
36 from the column to the site of the 1813 Battle
37 of Lake Erie.

38 Goals and objectives established in the Cultural
39 Landscape Treatment Plan common to each
40 action alternative include:

- 41 ■ Integration of expanded interpretation with an
42 approach to managing the cultural landscape;
- 43 ■ Utilization of the *Long Range Interpretive Plan*
44 (2012) visitor experience objectives to form a
45 justification for the proposed introduction of
46 elements into the historic landscape;
- 47 ■ Preservation of the designed landscape as the
48 principal asset of the Memorial, including the
49 individual features and the overall historic
50 character;
- 51 ■ Enhancement of the visitor experience by
52 creating a sense of entrance and welcome to
53 the park and opportunities for engagement
54 with the park through interaction with and
55 interpretation of both cultural and natural
56 resources;
- 57 ■ Provision of full ABAAS access to the
58 Memorial plazas, the visitor center, the
59 parkwide pedestrian circulation system, and
60 other park administration buildings and
61 housing;
- 62 ■ Facilitation of enhanced visitor experience of
63 the park through additional circulation
64 options, pavilions for expanded programming
65 and events, visitor nodes for seating and
66 enjoyment of viewsheds, and expanded
67 interpretation of visitor center exhibits and
68 strategically located wayside exhibits;
- 69 ■ Installation of new tree plantings along the
70 north/south perimeter edge of the historic
71 core boundary to augment existing tree

- 1 plantings, creating a more defined enclosure
2 of the horizontal landscape of the historic
3 core;
- 4 ■ Installation of a pedestrian sidewalk adjacent
5 to the north seawall;
 - 6 ■ Design of transitions from the village to the
7 park from both Hartford Avenue and Toledo
8 Avenue. Transition areas would be designed to
9 create a sense of entrance and welcome to the
10 park and provide orientation, information,
11 and choices for the visitor experience;
 - 12 ■ Integration and connection of the park to the
13 village beach boardwalk access and visitor
14 amenities;
 - 15 ■ Provision of additional park staff housing and
16 park administration facility; and
 - 17 ■ Provision of a black powder magazine and
18 buffer zone that meets compliance standards.

19 **Alternative 2 Action Alternative**

20 **Curvilinear Pedestrian Circulation; 21 Integration of Landscape Focus**

22 *Refer to Figure 4-11: Alternative 2*

23 Alternative 2 would preserve the designed historic
24 landscape indicative of the Beaux Arts tradition of
25 formal integration of architecture and landscape
26 through design of a curvilinear pedestrian
27 circulation system. The curvilinear framework
28 would retain the contrast of the horizontal
29 landscape with the vertical column of the
30 Memorial and introduce a strong symmetrical
31 pattern around the Memorial. The circulation
32 system would not retain any existing sidewalks
33 except along the south seawall. The design
34 concept would create distinct landscape spaces for
35 the purpose of preserving the horizontal expanses
36 of lawn flanking the Memorial and providing
37 opportunities for outdoor programs. Integration
38 of the landscape into the visitor experience would
39 include expanded interpretation of cultural
40 resources in the park. High priorities would be:
41 visual and physical access to the Memorial; formal
42 and welcoming entrances and transitions from the

43 village to the park; and clear connections to
44 important site features.

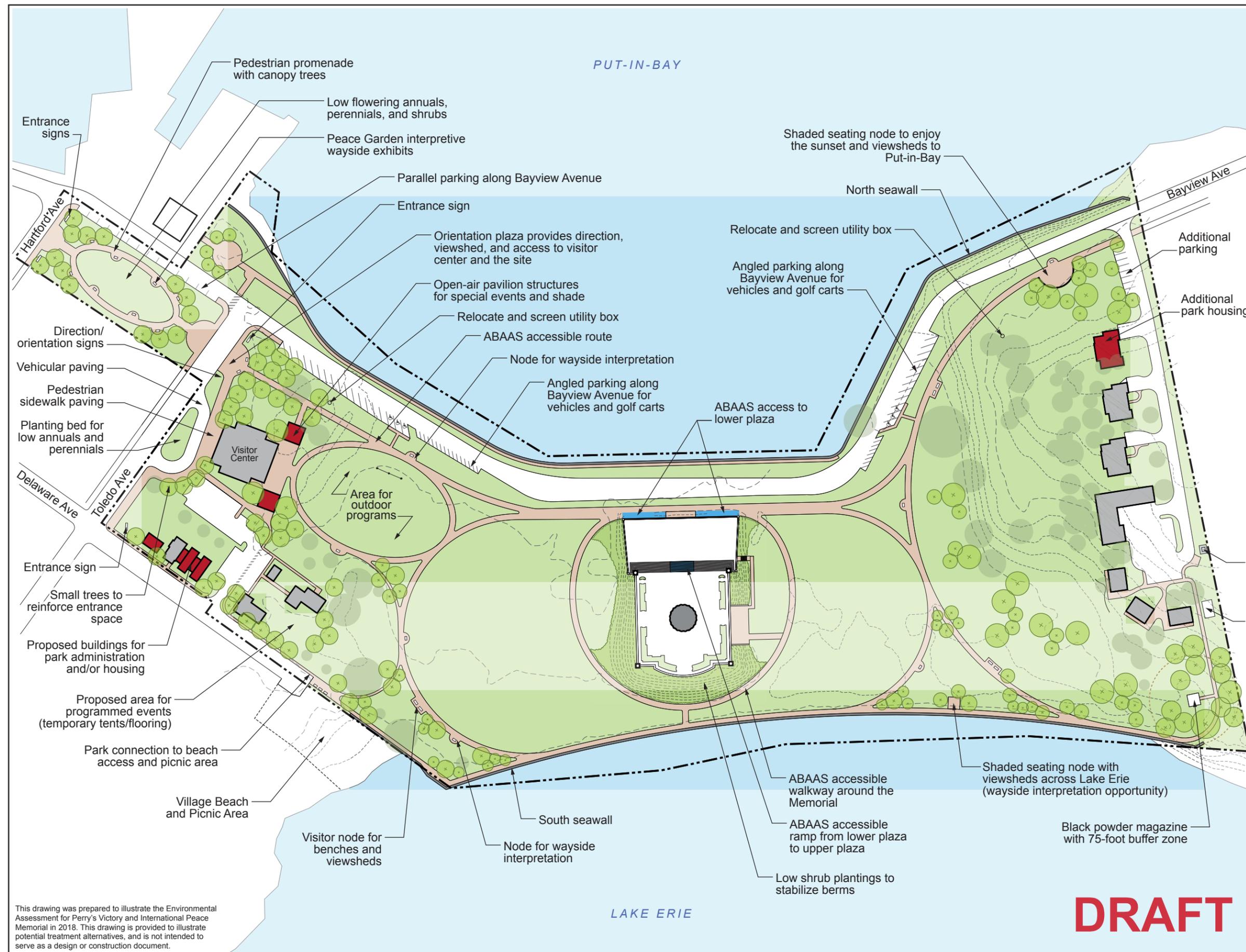
45 Specific actions resulting from the implementation
46 of this alternative would include:

47 **Peace Garden and Entrances to the Park**

- 48 ■ Design of the Peace Garden between Hartford
49 and Toledo Avenues would provide visitor
50 entrance to the park with a clear sense of
51 arrival, direction, and welcome. The Peace
52 Garden would provide interpretive wayside
53 exhibits, seating nodes and large shade trees
54 along an oval walkway. The oval would begin
55 at the entrance to Hartford Avenue and
56 terminate with an orientation plaza where
57 visitors would be provided with direction,
58 information, and choices associated with their
59 experience of the park.
- 60 ■ A plaza area would form the terminus of the
61 oval walkway and provide site orientation with
62 a direct view to the Memorial; direction to and
63 through the visitor center; and site furnishings
64 for visitor comfort and orientation.
- 65 ■ A second entrance to the park would be
66 provided at the intersection of Delaware
67 Avenue and Toledo Avenue at the southwest
68 boundary. This access area would provide
69 visitors with orientation; viewsheds to the
70 Memorial; and directions to the visitor center.

71 **Pedestrian Circulation**

- 72 ■ The circulation system would provide access
73 to the Memorial through a curvilinear pattern
74 of walkways affording the opportunity to
75 integrate the landscape into the visitor
76 experience and expand interpretation of the
77 cultural landscape with wayside exhibits
78 strategically placed in nodes along the
79 sidewalks. Viewsheds would be provided and
80 enhanced with wayside interpretation specific
81 to the themes described in the Long Range
82 Interpretive Plan. The circulation pattern
83 would create smaller landscape spaces
84 conducive to passive recreational activities.
85 Nodes would be located strategically on the
86 sidewalks, providing opportunity for wayside



- Legend**
- Memorial Park Boundary
 - - - 2' Contours
 - █ Existing buildings
 - █ Seawall
 - █ Proposed buildings
 - Existing trees
 - Proposed trees
 - █ Proposed ADAAS route
 - █ Proposed pedestrian walk
 - 75-foot buffer zone
 - Ⓜ Node for wayside interpretation
 - Ⓜ Node for benches/viewshed

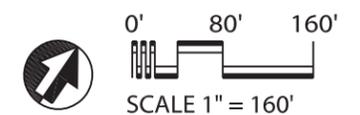


Figure 4-11
Alternative 2
Curvilinear Pedestrian
Circulation; Integration of
Landscape Focus

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Data Sources: Base map based on GIS shapefiles provided to the authors by NPS and supplemented through with aerial photography and other NPS maps

1 exhibits, benches, and views of the Memorial
2 and surrounding landscape.

3 ■ The pedestrian walkway north of the
4 Memorial would extend to the northeast end
5 of the park, providing access to a
6 contemplative node with an open viewshed
7 across the water. The walkway would
8 terminate at the service drive. A small parking
9 area would be provided at the entrance to the
10 service drive.

11 **Parking**

12 ■ Existing parking associated with the visitor
13 center and park administration building would
14 be retained, with a single entrance/exit from
15 Delaware Avenue.

16 ■ The tram loop drive would remain and the
17 interior island of the loop would be planted
18 with an array of colorful annuals, perennials,
19 and grasses.

20 ■ Angled parking for vehicles and golf carts
21 would remain on Bayview Avenue north of the
22 Memorial, with sidewalk connections to the
23 major walkway.

24 **Vegetation**

25 ■ Most of the existing trees in the park would be
26 retained. The Austrian pines would remain
27 around the base of the Memorial until the
28 plaza rehabilitation begins. Construction
29 would require that the Austrian pines be
30 removed. They would not be replaced within
31 this alternative. The grass berms would be
32 stabilized with low-growing shrubs or
33 groundcover.

34 ■ The tall birches currently in the loop drive
35 island would be removed in order to allow
36 better visual connection from the park
37 entrances to the visitor center. New vegetation
38 in the island would include colorful annuals,
39 perennials, and grasses.

40 ■ Proposed trees would enhance the entrance
41 sequence through the Peace Garden. Trees in
42 this area would provide shade, and enclosure

43 would accentuate the axial relationship of the
44 pedestrian nodes within the Peace Garden.
45 Character and size of the trees would follow
46 recommendations in the CLTP.

47 ■ Proposed trees would function to direct views
48 to the visitor center retaining the viewshed
49 from the orientation plaza to the Memorial
50 column. The trees would be deciduous and
51 smaller than the shade trees in the Peace
52 Garden. Character and size of the trees would
53 follow recommendations in the CLTP.

54 **Buildings and Structures**

55 ■ Open-air pavilions would be provided east of
56 the visitor center, affording opportunities for
57 group events and programs, shade, and
58 protection from the rain.

59 ■ Upper plaza paving would be granite and
60 brick, based on the original Freedlander plans
61 as described in the CLTP.

62 ■ Upper plaza panels would be retained and
63 maintained with grass as recommended in the
64 CLTP

65 **Alternative 3 Action Alternative**
66 **(NPS Preferred Alternative)**

67 **South Nodes with Lakeside Promenade;**
68 **Memorial Focus**

69 *Refer to Figure 4-12: Alternative 3*

70 The concept for this alternative would retain the
71 designed historic landscape originating in the
72 traditional Beaux Arts style of formal and
73 symmetrical relationships of architecture and the
74 landscape. The relationship of architecture and
75 the landscape would be preserved within a pattern
76 of rectilinear sidewalks near the Memorial
77 reinforcing the contrast of the horizontal
78 landscape with the vertical column. In order to
79 preserve this relationship, a circulation framework
80 would include existing and proposed sidewalk
81 connections throughout the park. Symmetry
82 around the Memorial would be preserved and
83 enhanced by new sidewalks and the horizontal
84 expanse of the open lawn landscape. Additional

1 new sidewalks would border the edge of the
2 historic core and provide visitors with a more
3 informal connection from the historic core to park
4 features and areas east and west of the Memorial.
5 Goals in this alternative include: visitor amenities
6 and opportunities for expanded interpretation;
7 clear and welcoming transitions from the
8 surrounding community to the park; and a variety
9 of connections to features throughout the park.

10 Specific actions resulting from the implementation
11 of this alternative include:

12 **Peace Garden and Entrances to the Park**

- 13 ■ Design of the Peace Garden between Hartford
14 and Toledo Avenues would provide a formal
15 visitor entrance to the park with a clear sense
16 of arrival, direction, and welcome. The Peace
17 Garden would provide interpretive wayside
18 exhibits, seating nodes and large shade trees. A
19 formal axial promenade would begin from
20 Hartford Avenue and terminate with an
21 orientation plaza with direction, information,
22 and choices associated with their experience
23 of the park.
- 24 ■ The orientation plaza would provide a direct
25 view to the Memorial and associated wayside
26 interpretation; direction to and through the
27 visitor center; and site furnishings for visitor
28 comfort and orientation.
- 29 ■ A second entrance to the park would be
30 located at the intersection of Delaware Avenue
31 and Toledo Avenue at the southwest corner of
32 the Park. This park access would provide
33 visitors with orientation, viewsheds to the
34 Memorial, welcoming banners, and
35 information.

36 **Pedestrian Circulation**

- 37 ■ The circulation system would provide access
38 to the Memorial through existing sidewalks
39 north and south of the memorial and the
40 existing diagonal walkways. Two additional
41 sidewalks aligned parallel with the Memorial
42 would be added for ease of access to the
43 Memorial and direct connections to the north
44 and south sidewalks. Two additional

45 curvilinear walkways would be integrated into
46 the plan to provide an informal and shady
47 connection through the trees from the visitor
48 nodes at the south sea wall.

- 49 ■ A node for interpretive wayside exhibits
50 would be provided east of the visitor center
51 and the open air pavilions. Wayside exhibits
52 would be limited to this area and would not be
53 spread over the entire circulation system of
54 the park.
- 55 ■ Three additional visitor nodes would be
56 provided. One node would terminate each
57 diagonal walkway at the south seawall
58 sidewalk and a node would be provided in the
59 northwest corner of the park associated with
60 the sidewalk. Benches would afford visitors
61 expansive viewsheds of the Memorial and the
62 Lake and Bay surrounding the park.

63 **Parking**

- 64 ■ Existing parking associated with the visitor
65 center and park administration building would
66 be retained, with a single entrance/exit from
67 Delaware Avenue.
- 68 ■ The tram loop drive would remain and the
69 interior island of the loop would be planted
70 with an array of colorful annuals, perennials,
71 and grasses.
- 72 ■ Existing trees would remain in the park unless
73 construction required removal. The Austrian
74 pines around the Memorial would remain
75 until the rehabilitation of the plaza began,
76 requiring their removal. After rehabilitation of
77 the plaza, new trees would be planted flanking
78 each side of the Memorial. The grass berms
79 would be stabilized with low-growing shrubs
80 or groundcover.
- 81 ■ Angled parking on Bayview Avenue would be
82 provided and include ABAAS spaces flanking
83 the Memorial.

84 **Vegetation**

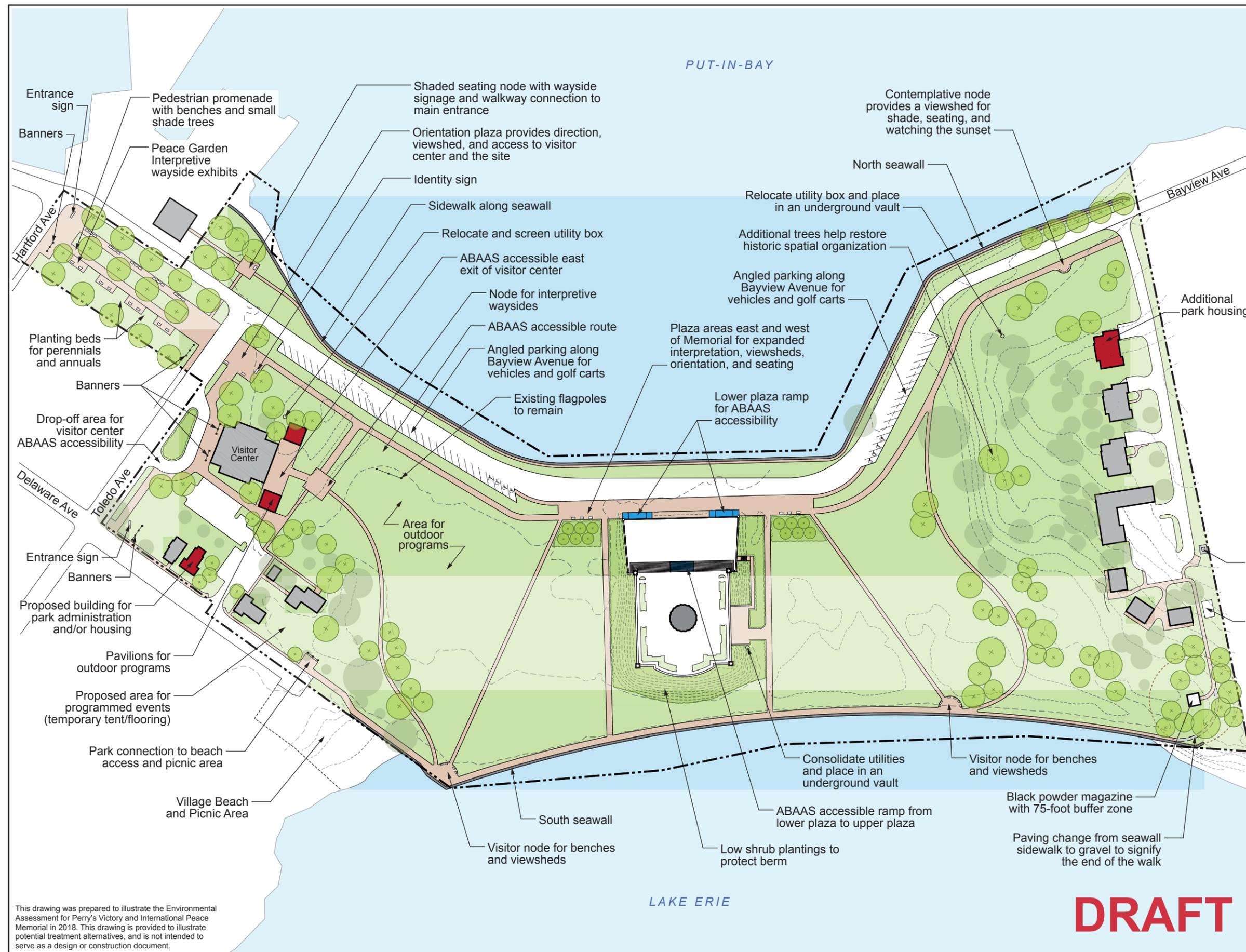
- 85 ■ Most of the existing trees in the park would
86 remain. The Austrian pines would remain

Cultural Landscape Treatment Plan and Environmental Assessment

for

Perry's Victory and International Peace Memorial

February 2018



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Data Sources: Base map based on GIS shapefiles provided to the authors by NPS and supplemented through with aerial photography and other NPS maps

1 around the base of the Memorial until the
2 plaza rehabilitation begins. Construction
3 would require that the Austrian pines be
4 removed. They would be replaced within this
5 alternative with deciduous shade trees. The
6 grass berms would be stabilized with low-
7 growing shrubs or groundcover. Character
8 and size of the trees, shrubs and or
9 groundcovers associated with the Memorial
10 column, plazas, and berms would follow
11 recommendations in the CLTP.

- 12 ■ The tall birches currently in the loop drive
13 island would be removed in order to allow
14 better visual connection from the park
15 entrances to the visitor center. New vegetation
16 in the island would include colorful annuals,
17 perennials, and grasses.
- 18 ■ Proposed trees associated with the entrance
19 sequence through the Peace Garden would
20 provide shade and enclosure accentuating the
21 axial relationship of the pedestrian nodes
22 within the Peace Garden. Character and size
23 of the trees would follow recommendations in
24 the CLTP.
- 25 ■ Proposed trees associated with the visitor
26 center would direct views to the visitor center,
27 provide seasonal color, and retain the
28 viewshed from the orientation plaza to the
29 Memorial column. The trees would be
30 deciduous and smaller than shade trees in the
31 Peace Garden. Character and size of the trees
32 would follow recommendations in the CLTP.
- 33 ■ Proposed trees associated with the
34 preservation of tree massing along the east and
35 west boundaries of the historic core would
36 reflect characteristics of the existing tree
37 plantings and function to augment the sense of
38 definition of the historic Memorial and its
39 landscape setting. Character and size of the
40 trees would follow recommendations in the
41 CLTP.

42 Buildings and Structures

- 43 ■ Open-air pavilions flanking the rear exit of the
44 visitor center would provide direct access to a

45 node for new interpretive waysides. These
46 features would expand outdoor programs and
47 events.

- 48 ■ Upper plaza paving would be granite and
49 brick, based on the original Freedlander plan
50 as described in the CLTP.
- 51 ■ Upper plaza panels would be retained and
52 maintained with grass, following
53 recommendations from the CLTP.

54 Selection of the NPS-Preferred 55 Alternative

56 The preferred alternative emerged from
57 presentation of the action alternatives during two
58 public scoping sessions and conference calls and
59 reviews with park staff at Perry's Victory and
60 International Peace Memorial. Design sketches
61 and comments from these sessions suggested the
62 preference for Alternative 3. This alternative
63 would preserve the designed historic landscape
64 and retain many of the rectilinear sidewalks
65 currently within the park. Additional sidewalks
66 would be introduced, supporting the symmetry of
67 the original Beaux Arts design intent for the
68 Memorial and its landscape setting. Within the
69 designed landscape, Alternative 3 would afford
70 visitors expanded interpretation through wayside
71 exhibits at the visitor node associated with the
72 visitor center and open-air pavilions. Major goals
73 of the park would be addressed including: ABAAS
74 accessibility to both Memorial plazas, the
75 circulation system, and all buildings except the
76 Memorial column; a formal and welcoming
77 entrance to the park through the Peace Garden;
78 black powder magazine and buffer in compliance
79 with regulations; and extended circulation
80 allowing connections and access to the Memorial
81 and integration of the entire park into the visitor
82 experience.

83 Mitigation

84 The National Park Service places strong emphasis
85 on avoiding, minimizing, and mitigating
86 potentially adverse environmental impacts
87 associated with making a change within a historic
88 landscape. To help ensure the protection of

1 natural and cultural resources and the quality of
2 the visitor experience at Perry’s Victory and
3 International Peace Memorial, protective
4 measures would be implemented as part of the
5 preferred alternative (See Appendix A: Mitigation
6 Measures). The NPS would implement an
7 appropriate level of monitoring throughout the
8 construction process to help ensure that
9 protective measures are being properly
10 implemented and are achieving their intended
11 results (Figures 4-13 and 4-14).



Figure 4-13: Stormwater management throughout the park will be addressed with mitigation measures during implementation of the preferred alternative.



Figure 4-14: Drainage and separation of utility pipes will be addressed with mitigation measures during implementation of the preferred alternative.

2 Musgrave, Donald K., and George D. Derringer, *1985 Soil Survey of Ottawa County, Ohio*, Soil Conservation Service, U.S. Department of Agriculture, Washington, D.C.

12 **Affected Environment**

13 This section specifically discusses the resources
14 potentially impacted by implementing the
15 proposed No Action and Action alternatives. The
16 resources discussed below were identified and
17 described as impact topics in Chapter 1 of this
18 document. Identification was based on issues
19 raised by agencies and the public during scoping;
20 existing site conditions; federal laws, regulations
21 and Executive Orders; National Park Service
22 (NPS) Management Policies 2006; topics specified
23 in Director’s Order 12 and Handbook; and park
24 specific resource information.

25 Natural resources examined in detail at Perry’s
26 Victory and International Peace Memorial
27 include: geology and soils; water
28 resources/floodplains; vegetation; wildlife; and
29 threatened and endangered species. Cultural
30 resource topics evaluated include: historic
31 buildings and structures; cultural landscapes; and
32 historic viewsheds. The remaining topics
33 examined in detail include visitor use and
34 experience and human health and safety.

35 **Natural Resources**

36 **Geology and Soils**

37 Ottawa County lies entirely within the glaciated
38 portion of Ohio, and thus its soils are post-glacial
39 in origin. Most of the county, including South Bass
40 Island, lies in the lake plain of glacial Lake
41 Maumee. The lake plain sediments of which the
42 soils are formed are of variable thickness and are
43 underlain by glacial till, which is further underlain
44 by limestone. The dominant limestone outcrops
45 occur primarily in the county’s western peninsula
46 and in the islands. ² The surface of South Bass
47 Island is generally flat (one to six percent slope),
48 though limestone outcrops and knolls are present.

49 The soils of South Bass Island are of the Castalia-
50 Milton association. These soils are generally well-

1 drained, moderately deep, and nearly level to
2 gently sloping. Castalia soils were formed in
3 residuum from fractured limestone and in glacial
4 drift in voids in the bedrock. Castalia soils are very
5 stony, characterized by rapid permeability and low
6 water capacity. Milton soils are characterized as
7 loamy and clayey glacial till over limestone
8 bedrock. Permeability is moderately slow and
9 water capacity is low. Agriculturally, Castalia-
10 Milton soils are best used for orchards, vineyards,
11 and brush.³

12 The majority of the soils present within the
13 boundaries of Perry's Victory and International
14 Peace Memorial are Udorthents which appear as
15 deep, nearly level, and gently sloping soils in cut
16 and fill areas. Earthmoving and grading have
17 mixed or removed the original topsoil and subsoil.
18 The remaining soil is typical of the subsoil and
19 substratum of adjacent soils, Milton silt loam and
20 Castalia very stony, fine sandy loam. In fill areas,
21 such as the Memorial grounds, the soil
22 characteristics are more variable. On the eastern
23 end of the grounds, the topsoil is approximately 6
24 inches deep, with 18-inch clayey subsoils. Runoff
25 is medium to rapid and hard rains seal the surface
26 in poorly vegetated areas. A seasonally highwater
27 table occurs in depressed or bowl-shaped areas.⁴

28 Perry's Victory and International Peace Memorial
29 is sited on a low and narrow isthmus (or tombolo)
30 that was originally swampy land. A tombolo is a
31 deposition landform created by wave refraction
32 and diffraction. Since the site was selected in 1911,
33 an almost continuous process of leveling and
34 filling has resulted in a flat and uniform grade. The
35 lowest elevation occurs in the lawn on the west
36 side of the property, just northeast of the
37 superintendent's residence; the highest elevation

38 occurs outside the historic core along the
39 northeast boundary of the park.⁵

40 **Water Resources, Floodplains, and Wetlands**

41 Perry's Victory and International Peace Memorial
42 is located on South Bass Island in Lake Erie. The
43 lake is the dominate water resource affecting the
44 park. The level of Lake Erie fluctuates generally
45 between one and three feet during the year. When
46 the lake rises to an elevation between 571
47 International Great Lakes Datum (IGLD) and 573
48 IGLD, flooding can result in varying degrees of
49 damage to the memorial, grounds, and facilities.
50 Storms are a problem, combining high lake levels
51 with strong winds, thus driving large amounts of
52 water onto the Memorial grounds (Figures 4-15
53 and 4-16). Storm damage frequently results in the
54 deposition of debris on the grounds, as well as
55 standing water within the Memorial structure and
56 other park structures. Washouts have occurred at
57 the southwest end of the seawall abutting the
58 village beach and continue to occur after the most
59 recent construction and repair to the south
60 seawall.⁶

61



Figure 4-15: Put-in Bay and the expanse of Lake Erie as seen from the Memorial observation platform.

3 Musgrave, Donald K., and George D. Derringer, *1985 Soil Survey of Ottawa County, Ohio*, Soil Conservation Service, U.S. Department of Agriculture, Washington, D.C.

4 National Park Service, *Perry's Victory and International Peace Memorial, Ohio: Development Concept Plan Revision, Interpretive Prospectus*, 1992, National Park Service, U.S. Department of the Interior, 10.

5 Williams, Sherda K., and Susan Calafate Boyle, *Perry's Victory and International Peace Memorial Put-in-Bay, Ohio: Cultural Landscape Report*, 1994, National Park Service, Midwest Regional Office, Planning and resource Preservation, Omaha, Nebraska, 61.

6 National Park Service, *Perry's Victory and International Peace Memorial, Ohio: Development Concept Plan Revision, Interpretive Prospectus*, 1992, National Park Service, U.S. Department of the Interior, 11-12.



Figure 4-16: Lake Erie south of the park as seen from the Ferry as it departs from South Bass Island. The Memorial column can be seen in the distance.

1 Most of the Memorial lies within the 100 and 500-
2 year floodplains. Only the easternmost portion of
3 the Memorial and a small corner at the southwest
4 boundary are outside the 500-year floodplain.⁷
5 Most standing water accumulating on the site
6 drains in approximately 24 hours. However, the
7 soil in certain low-lying areas of the site remains
8 saturated for more than a week after heavy rains.

9 Most of the park boundary is within the regulated
10 100-year floodplain. A 100-year floodplain does
11 not mean that such a flood is likely to occur every
12 100 years; rather, it means that there is a one-
13 hundred or 1% chance of such a flood occurring
14 in any given year. The functional value of the park
15 floodplain is minimal in that the area has already
16 been developed on many layers of fill, with the
17 construction of the north and south seawalls, the
18 Memorial and grounds, circulation, visitor center,
19 and housing/administration structures. Due to
20 these man-made features and years of excavation
21 and filling, many of the natural functions of the
22 floodplain cannot be carried out, including
23 providing flood storage, providing flood
24 conveyance, providing habitat, reducing excessive
25 erosion, trapping sediments, and removing
26 pollutants from waters.

27 U.S. Fish and Wildlife Service National Wetland
28 Inventory (NWI) maps were consulted for

7 Ibid, 11.

29 classification of wetlands in the park. There are no
30 wetlands identified in the area. Additionally, the
31 Ohio Department of Natural Resources, Division
32 of Natural Areas and Preserves, was consulted for
33 identification of state-listed species including
34 plants found in wetlands. State-listed plants were
35 recorded from the inshore waters of Put-in-Bay
36 and were found on mud flats along the shoreline,
37 but not within the park.

38 **Vegetation**

39 The park is landscaped with cultivated lawn
40 grasses and ornamental shrubs and trees and is
41 maintained regularly. The grounds have been
42 overlaid with fill material many times since the
43 establishment of the Memorial. Due to poor
44 drainage on the site, standing water has caused the
45 propagation of noxious weeds and undesirable
46 broad-leaved grasses, which create patches of
47 grasses differing in colors and textures.

48 Vegetation, besides the large expanses of lawn on
49 either side of the Memorial, consists of mature
50 shade trees in clusters or in scattered locations on
51 the site (Figure 4-17). Most of the larger trees
52 present on the site are deciduous and located on
53 the eastern edge of the grass lawn. “It is only on
54 the eastern boundary that the vegetative mass
55 intended to frame the view of the Memorial
56 remains discernable. The loss of vegetative mass



Figure 4-17: The historic core is characterized by a horizontal ground plane with an expanse of turf grass. There are deciduous trees west of the Memorial and the Austrian pines are visible around the Memorial plazas.

1 on the east and west boundaries negatively impacts
2 the feeling of enclosure evoked by the original
3 design.”⁸

4 There are fifteen Austrian pines growing on the
5 sloped berm around the Memorial plazas. There
6 are all that remain of forty pines specified in the
7 landscape design and planted in 1925. The
8 remaining pines have outgrown their original
9 designed size, and pruning efforts meant to
10 restrain upward growth has robbed them of the
11 clipped, conical shape specified by Freedlander.
12 The remaining trees are reaching the end of their
13 natural life and are scheduled for removal during
14 construction associated with the rehabilitation of
15 the plaza.⁹ Tree clusters are also located around
16 the Men’s Dormitory and the Ranger Operations
17 Center in the southwest corner of the historic
18 core. More recent plantings include shade trees
19 associated with the visitor center building, visitor
20 center parking lot, and Park headquarters.
21 Throughout the visitor services zone, there are
22 large beds of colorful annuals and perennials
23 (Figure 4-17).



Figure 4-18: Colorful perennials and annuals are located in the visitor center/park administration management zone. Scattered deciduous trees are also prevalent in the landscape.

24 **Wildlife**

25 Mammals present on South Bass Island include:
26 raccoon (*Procyon lotor*); muskrat (*Ondatra*
27 *zibethicus*); mouse (*Mos musculus*); eastern
28 cottontail (*Sylvilagus floridanus*); eastern gray
29 squirrel (*Sciurus carolinensis*); black squirrel
30 (*Sciurus meridionalis*); and red fox (*Vulpes vulpes*).
31 Birds observed nesting on the memorial grounds
32 include robins (*Erithacus rubecula*), grackles
33 (*Quiscalus quiscula*), and song sparrows (*Melospiza*
34 *melodia*). Additionally, other species observed
35 feeding on the memorial grounds, include: killdeer
36 (*Charadrius vociferous*); crow (*Corvus corax*);
37 downy woodpecker (*Picoides pubescens*); red-eyed
38 vireo (*Vireo olivaceus*); starling (*Sturnus vulgaris*);
39 red-winged blackbird (*Agelaius phoeniceus*);
40 double-crested cormorants (*Phalacrocoax*
41 *auratus*); and yellow-shafted flicker (*Colaptes*
42 *auratus*). Purple martins (*Progne subis*) are present
43 at Scheeff East Point Nature Preserve on South
44 Bass Island. These birds east of the Rockies only
45 nest in man-made housing which include both
46 natural and plastic gourds. The island location in
47 Lake Erie provides plenty of flying insects for food
48 and open habitat, at least 40 feet from tall trees
49 (where large avian predators scout for smaller
50 prey). Incidental visitors to the memorial include
51 migrating mallard (*Anas platyrhynchos*) and Canada
52 geese (*Branta canadensis*).¹⁰

53 Numerous species of amphibians and reptiles have
54 been recorded on South Bass Island and in
55 adjacent waters. Several freshwater mussel species
56 (*Margaritifera margaritifera*) inhabit the waters
57 around the memorial. Ninety-five species of fish
58 have been recorded for Ottawa County, a few
59 include: alewife (*Alosa Pseudoharengus*); cisco
60 (*Coregonus artedi*); lake whitefish (*Coregonus*
61 *clupeaformis*); darters (*Sympetrum Striolatum*);
62 sunfish (*Mola mola*); walleye (*Sander vitreus*); small

8 National Register of Historic Places Registration Form,
(2014), Section 7, page 12.

9 Ibid.

10 National Park Service, 1992 *Perry’s Victory and
international Peace Memorial, Ohio: Development
Concept Plan Revision, Interpretive Prospectus*. National
Park Service, U.S. Department of the Interior, 8.

1 mouth bass (*Micropterus dolomieu*); and Yellow
2 perch (*Perca flavescens*).¹¹

3 **Rare, Threatened, and Endangered Species**

4 The U. S. Fish and Wildlife Service (USFWS) Ohio
5 Ecological Services has identified the federally-
6 listed species, proposed species, candidate species
7 and designated and proposed critical habitat
8 present or potentially present at Perry's Victory
9 and International Peace Memorial. USFWS
10 offered the comments pursuant to the Fish and
11 Wildlife Coordination Act (16 U.S.C. 661 et seq.),
12 National Environmental Policy Act of 1969 (42
13 U.S.C. 4321-4347), and the Endangered Species
14 Act of 1973, as amended (16 U.S.C. 1531-1544).

15 **Species of Concern.** The project lies within the
16 range of the monarch butterfly (*Danaus plexippus*).
17 The USFWS has determined that listing under the
18 ESA may be warranted and is currently conducting
19 a status review of the monarch. Monarch
20 butterflies are found throughout Ohio and some
21 populations migrate vast distances across multiple
22 generations each year. The Lake Erie islands
23 provide important migration and stopover habitat
24 for monarchs as they fly between the U.S., Mexico
25 and Canada—a journey of over 3,000 miles.

26 The project boundary lies within the range of the
27 Lake Erie watersnake (*Nerodia sipedon insularum*),
28 a state endangered species, and a Federal species
29 of concern that was recently removed from the
30 Federal list of Endangered and Threatened
31 Wildlife and Plants due to recovery. The
32 watersnake is found on the offshore islands and in
33 adjacent water of Lake Erie. Watersnake summer
34 habitat consists mainly of rocky shorelines with
35 adjacent vegetation and shoreline structures such
36 as crib docks. Winter hibernation habitat for the
37 watersnake includes the island interior and the
38 shoreline/vegetation interface.

39 **Federally Listed Species.** All projects in the
40 State of Ohio lie within the range of the federally
41 endangered Indiana bat (*Myotis sodalist*) and the

42 federally threatened northern long-eared bat
43 (*Myotis septentrionalis*).

44 In Ohio, presence of the Indiana bat and northern
45 long-eared bat is assumed wherever suitable
46 habitat occurs unless a presence/absence survey
47 has been performed to document absence.
48 Suitable summer habitat for Indiana bats and
49 northern long-eared bats consists of a wide variety
50 of forested/wooded habitats where they roost and
51 forage and may also include some adjacent and
52 interspersed non-forested habitats such as
53 emergent wetlands and adjacent edges of
54 agricultural fields, old fields and pastures.
55 Individual trees may be considered suitable habitat
56 when they exhibit the characteristics of a potential
57 roost tree and are located within 1,000 feet of
58 forested/wooded habitat. Northern long-eared
59 bats have also been observed roosting in human-
60 made structures, such as building, barns, bridges,
61 and bat houses; therefore, these structures should
62 also be considered potential summer habitat. In
63 the winter, Indiana bats and northern long-eared
64 bats hibernate in caves and abandoned mines.

65 The proposed project lies within the range of the
66 Kirtland's warbler (*Setophaga kirtlandii*), a
67 federally listed endangered species. The Kirtland's
68 warbler is a small blue-gray songbird with a bright
69 yellow breast. This species migrates through Ohio
70 in the spring and fall, traveling between its
71 breeding grounds in Michigan, Wisconsin, and
72 Ontario and its winter grounds in the Bahamas.
73 While migration occurs in a broad front across the
74 entire state, approximately half of all observations
75 in Ohio have occurred within 3 miles of the
76 shoreline of Lake Erie. During migration,
77 individual birds usually forage in shrub/scrub or
78 forested habitat and may stay in one area for a few
79 days.

80 **Cultural Resources**

81 **Historic Buildings and Structures**

82 Perry's Victory and International Peace Memorial
83 is nationally significant under Criterion C in the
84 area of architecture for embodying the distinctive

¹¹ *Ibid.*

1 characteristics of a type and period and because it
 2 represents the work of a master. The centerpiece
 3 of the Memorial is the massive Doric column of
 4 Milford pink granite topped by an immense
 5 bronze lantern. Its rotunda, located within the
 6 granite shaft features a domed ceiling, above
 7 which an elevator transports visitors to the
 8 observation platform. The surrounding plazas are
 9 constructed of reinforced concrete faced with
 10 granite. The upper and lower plazas are connected
 11 by a grand staircase, that occupies the full length of
 12 both plazas. The Memorial Column, plazas, and
 13 connecting stairs are considered one contributing
 14 feature.¹² Additional structures or small- scale
 15 features associated with the Memorial that are also
 16 contributing include: granite walls associated with
 17 the plazas; granite benches and urns located at the
 18 corners of the upper plaza; and the structured
 19 berm surrounding the lower plaza (Figure 4-19).
 20 The Memorial and its grounds are an excellent
 21 example of the harmony of building and
 22 landscaping that is integral to the Beaus Arts style
 23 in America, with its monumental classicism in
 24 architecture set within a designed, formal
 25 landscape. Although the entire design for the site
 26 by architects Joseph H. Freedlander and
 27 Alexander D. Seymour was never completely
 28 executed, the portions that were constructed have
 29 generally retained their integrity and are true to
 30 the formal, axial design and classical architecture
 31 typical of Beaux Arts style.

32 The Superintendent's Residence and garage were
 33 built in 1951. A Neo-Colonial Revival-style
 34 building, the Superintendent's Residence, now the
 35 Men's Dormitory for seasonal employees, is a
 36 story-and-a-half, compound-plan building,
 37 constructed over a crawlspace, with a central door
 38 and stoop on the front side of the main block and
 39 on the west (and only) wing of the building. It
 40 remains in its original location and is in close
 41 proximity to the Ranger Operations Center.
 42 Though it is no longer used as the
 43 Superintendent's Residence, it continues to



Figure 4-19: The upper plaza of the Memorial forms its base. Granite urns are in each corner of the upper plaza.

44 function in its historic use as a residence for park
 45 personnel in its capacity as a Men's Dormitory for
 46 seasonal employees. It speaks to the historic and
 47 continuing administrative needs of the park. For
 48 these reasons, it is a contributing building on the
 49 historic site. The original garage associated with
 50 the building has been demolished. The gable-
 51 roofed storage building now adjacent to the Men's
 52 Dormitory, does not constitute a replacement of
 53 the original garage and is a non-contributing
 54 feature of the site.¹³

55 The north and south seawalls are listed in the
 56 National Register of Historic Places as non-

12 National Register of Historic Places Nomination Form, Section 7 page 15-16.

13 Harvey, Deborah E. Outside The Box, LLC, *National Register of Historic Places Registration Form for Perry's Victory and International Peace Memorial*, (2014), Put-in-Bay, Ohio. Section 7, page 16.



Figure 4-20: Memorial column is seen in the distance. The South seawall forms the south boundary of the historic core.

1 contributing due to the significant changes made
2 to them over the years. The sidewalk at the south
3 seawall is also non-contributing due to its change
4 in locations when the eastern half of the south
5 seawall was relocated in 1977.¹⁴ The seawalls,
6 however, are compatible because they replaced
7 walls that defined the original boundaries of the
8 historic site and help retain the original design
9 intentions of the architects (Figure 4-20).

10 **Cultural Landscapes**

11 The flat, grassy expanse of the site is defined on
12 the east by a ragged treeline, bisected by the paving
13 of the memorial plazas, crisscrossed by walkways
14 to facilitate visitor traffic, and punctuated by

15 specimen trees and groups of tree plantings. The
16 most prominent vegetative feature of the site,
17 however, is the flat, grassed lawn, a mixture of
18 grasses, clover, and weeds watered by an irrigation
19 system. The architects specified a mixture of
20 several types of grasses and white clover in the
21 earliest landscape design, but it is unknown
22 whether that was ultimately the mix planted or if
23 any of the original grasses remain. Nevertheless,
24 the wide, flat horizontal expanse of grass as a
25 visual counter to the verticality of the memorial
26 column was integral to the original design concept.
27 It exists today essentially as designed.¹⁵

28 In addition, the planter beds located on the upper
29 plaza were specified as beds of grass, called grass
30 panels in the original design. As grass panels, they
31 would carry the overall effect of the horizontal
32 plane of the lawn onto the plaza. Although planted
33 in barberry hedging between 1925 and 1933, they
34 have been planted in grass, per the original design,
35 since the removal of the barberry hedges
36 beginning in the mid-1930s. Planting of grass in the
37 planter beds has been the historic treatment since
38 the mid-1930s and matches the historic design.¹⁶

39 Vegetation, besides the grassy expanses of lawn on
40 either side of the Memorial, consists of mature
41 shade trees in clusters or in scattered locations on
42 the site. Most original vegetation was cleared for
43 construction of the column in 1912. The architects
44 apparently intended that some of the existing trees
45 would be left standing after the site was cleared,
46 but there is no photographic evidence that this was
47 done. However, some of the trees recorded in
48 1994 as part of the *Cultural Landscape Report*
49 appear to be of a size that could indicate that they
50 date from before 1912. Although the exact ages of
51 these trees were not determined, all the remaining
52 trees should be considered features associated

14 Ibid. Section 7, page 13-14.

15 Ibid. Section 7, page 11.

16 Ibid.

1 with the Period of Significance due to their
2 probable age based on their size.¹⁷

3 Perry's Victory and International Peace Memorial
4 is locally significant under Criterion C in the area
5 of landscape architecture for embodying the
6 distinctive characteristics of a type and period
7 adapted to the special landscaping needs of an
8 island in a northern lake. Freedlander and
9 Seymour created a Beaux Arts landscape design to
10 complement the Beaux Arts architectural style of
11 the Memorial building(s) (Figure 4-21). The
12 designed cultural landscape of the Perry's Victory
13 and International Peace Memorial retains integrity
14 of location, design, setting, materials,
15 workmanship, feeling, and association¹⁸ (Figure 4-
16 22).

17 **Historic Viewsheds**

18 The architects of the memorial building, Joseph
19 Henry Freedlander and Alexander Duncan
20 Seymour, planned the arrangement of the grounds
21 surrounding it to create the views, vistas, and
22 viewsheds. They arranged the landscaping and
23 small-scale features of the grounds to create
24 artistic views of the Memorial as well as views
25 from the Memorial. The original plan organized
26 the landscape of the grounds to focus all visual
27 attention on the column. The unobstructed views
28 across the grass lawns were contrived by the
29 architects to wrest an impression of vast space
30 from a relatively small plot of ground.¹⁹ These
31 views from inside the park to the Memorial
32 column are intact today (Figures 4-23 and 4-24).

33 The most striking and significant view of the
34 Memorial, as planned by the architects, is the
35 approach from the lake on the north, where the
36 Memorial column appears to rise almost directly
37 from the waters of Lake Erie. This view looking
38 toward the Memorial, is currently protected by the
39 U.S. Army Corps of Engineers, which prevents



Figure 4-21: View to the cultural landscape west of the Memorial column and plazas. Large expanse of lawn covers the horizontal ground plane that is part of the original design intent for the Memorial and its landscape setting.



Figure 4-22: View to the cultural landscape east of the Memorial column and plazas. Lawn continues to the east, and trees form a sense of enclosure that help define the historic core.

40 boats from permanently anchoring in the harbor
41 in front of the Memorial.

42 The view northwest from the Memorial
43 observation platform near the top of the column
44 affords the best opportunity to see the area where
45 the Battle of Lake Erie was fought in 1813.
46 Obstructions are starting to occur from extension
47 of existing boat docks and construction of new
48 docks in Put-in-Bay which is not within the

17 Sherda K. Williams and Susan Calafate Boyle, *Perry's Victory Memorial Cultural Landscape Report for Perry's Victory and International Peace Memorial, Put-in-Bay, Ohio* (Denver: United States Department of the Interior, National Park Service, Denver Service Center, 1994), 96.

18 Harvey, Deborah E., Outside The Box, LLC, *National Register of Historic Places Registration Form for Perry's Victory and International Peace Memorial*, (2014), Put-in-Bay, Ohio. Section 7, page 11.

19 Ibid. Section 7, page 10.



Figure 4-23: Historic photograph (1950) from the park archives shows a grand view from Bayview Avenue toward the Memorial.



Figure 4-24: Approximately the same view in 2017, with powerlines cluttering the grand view to the Memorial from Bayview Avenue.

1 boundaries of the park or under the control of the
2 National Park Service.²⁰

3 **Visitor Use and Experience**

4 **Affected Environment**

5 The actions described in the alternatives are within
6 Perry's Victory and International Peace Memorial
7 which is located on South Bass Island in Lake Erie
8 near the U.S. – Canadian border. The site lies
9 within the Village of Put-in Bay, Township of Put-
10 in-Bay, in Ottawa County, Ohio. Port Clinton and
11 Sandusky are the closest mainland communities.
12 Visitors to the park reach South Bass Island by
13 ferry or private boats. There is a small air strip on
14 the island with small airplane service, but this is
15 mode of transportation is not for large scale

16 visitation to the park. Most visitors are from the
17 state of Ohio.²¹

18 **Visitor Experience and Interpretation:**

19 Perry's Victory and International Peace Memorial
20 has two visitor contact stations—the memorial and
21 the visitor center—and 25 acres of groomed
22 landscape between two seawalls. When open, the
23 memorial is the main attraction for park visitors
24 with approximately 150,000 visiting each season.
25 The visitor center is now the primary contact
26 station. Rangers, volunteers, and Eastern National
27 associates welcome visitors, provide orientation to
28 the memorial and the island, and deliver informal
29 interpretation. The visitor center has an
30 auditorium with a 15-minute DVD presentation
31 on the battle of Lake Erie.

20 Ibid.

21 *Perry's Victory and International Peace Memorial Visitor Study*, University of Idaho, Social Science Program U.S. Department of the Interior, National Park Service, 2009, 43.

1 The core interpretive programs for Perry's Victory
 2 are children's programs offered twice daily, hourly
 3 talks, evening programs three times a week, living
 4 history encampments, black powder musket firing
 5 demonstrations on weekends and cannonade
 6 firings one weekend a month. The park also hosts
 7 several special events throughout the summer
 8 months, each with interpretive/educational
 9 components. Interpretive staff present programs
 10 off-island at Ohio and Michigan schools, civic
 11 groups, and other venues. The park continues to
 12 expand its education and community outreach.²²

13 Visitors enter the Memorial column through the
 14 rotunda, where six officers from the War of 1812

15 are interred. Once inside the rotunda, visitors
 16 travel to the top of the column via steps and an
 17 elevator to a viewing platform (Figure 4-25). From
 18 this platform visitors can see across Lake Erie to
 19 the site of the naval battle (Figure 4-26). At the
 20 visitor center, a film can be viewed, along with
 21 exhibits interpreting the Battle of Lake Erie and
 22 the building of the Memorial column and plazas.
 23 In summer months, the landscaped grounds of the
 24 park provide an open space that serves as a calm,
 25 contemplative escape from the otherwise
 26 energetic, busy island and as a recreational space
 27 for both visitors and local island residents.²³

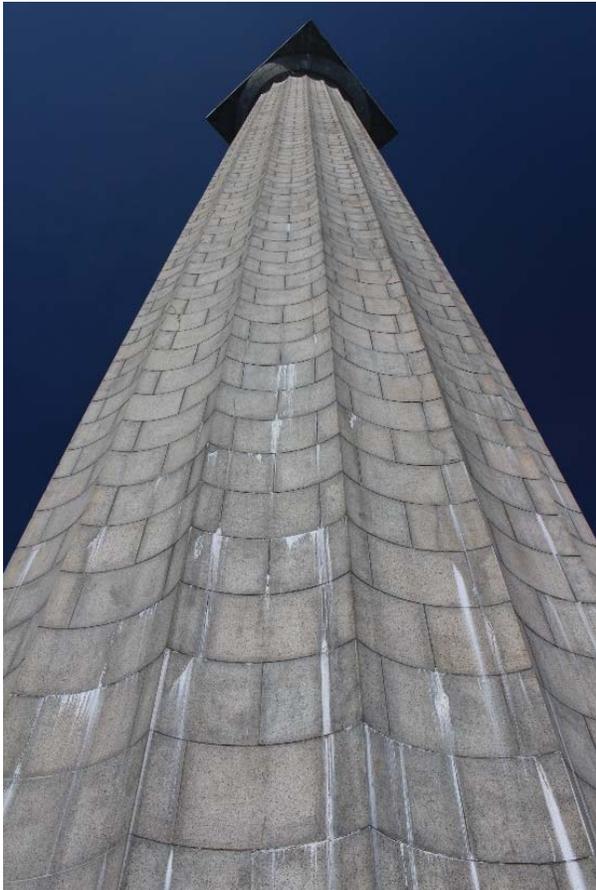


Figure 4-25: View toward the top of the column as seen from the plaza. A large doorway marks the entrance to the column.

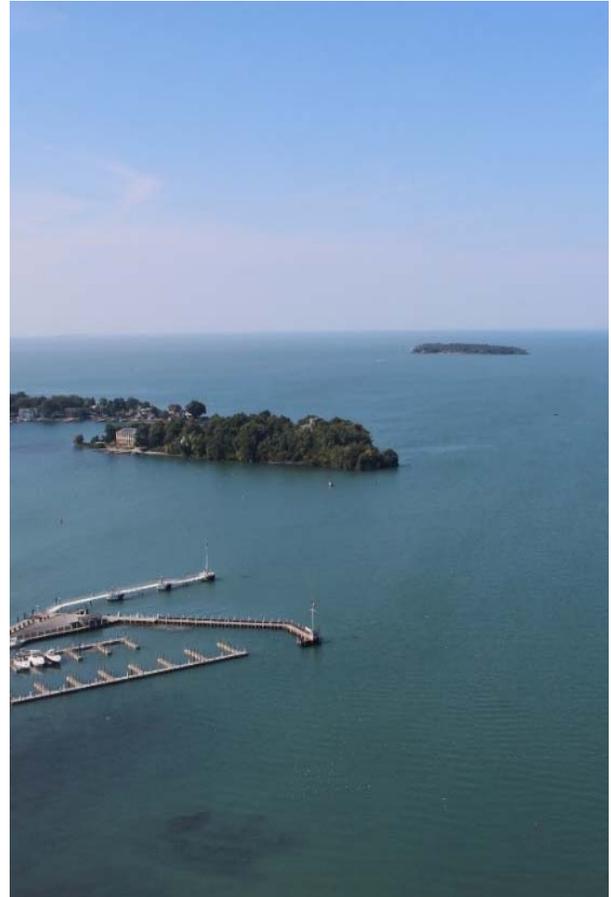


Figure 4-26: View from the observation platform at the top of the Memorial column. Interpretive maps are provided on the platform.

22 *Perry's Victory and International Peace Memorial Long-Range Interpretive Plan*, Harpers Ferry Center, U.S. Department of the Interior, National Park Service, October 2011. p 21.

23 *Foundation Document: Perry's Victory and International Peace Memorial*, U.S. Department of the Interior, National Park Service, October 2012. p 2.

1 **Human Health and Safety**

2 Numerous conditions at the park require
3 continual attention by management personnel to
4 ensure the safety of visitors. Park personnel are
5 vigilant about visitor safety issues such as the
6 potential for severe summer weather—heat and
7 humidity, storms and flooding, and the presence
8 of biting insects. Ongoing maintenance of
9 pedestrian sidewalks and roads, exhibits, site
10 furnishings, buildings, and vegetation are only part
11 of the comprehensive work required to ensure the
12 health and safety of the public. Park staff monitor
13 use of golf carts on the pedestrian sidewalks, a
14 potential safety hazard for visitors strolling
15 throughout the park. Staff is also responsible for
16 the safety of visitors once they are inside the
17 Memorial column and reach the observation
18 platform.

19 Vegetation management is ongoing and requires
20 removal of fallen limbs and debris. Maintenance of
21 trees is essential in order to prevent hazardous
22 conditions for visitors. The park is also vigilant
23 about the safety of visitors entering the park at
24 traffic intersections and crossing Bayview Avenue
25 north of the Memorial in order to access the north
26 seawall.

27 **Environmental Consequences**

28 The National Environmental Policy Act requires
29 that environmental documents discuss the
30 environmental impacts of a proposed federal
31 action, feasible alternatives to that action, and
32 adverse environmental impacts that cannot be
33 avoided if a proposed action is implemented. In
34 this case, the proposed federal action is the
35 implementation of treatment recommendations
36 contained in the Cultural Landscape Treatment
37 Plan (CLTP) for Perry’s Victory and International
38 Peace Memorial and the identification and
39 disclosure of potential impacts and effects of the
40 developed alternatives in order to fulfill all
41 compliance requirements. This chapter analyzes
42 and compares the environmental impacts on
43 natural resources, cultural resources, visitor use
44 and experience, and human health and safety. This
45 analysis compares the baseline of the “No Action”
46 alternative against the action alternatives to

47 determine positive and adverse outcomes. By
48 examining the environmental consequences of the
49 alternatives on an equivalent basis, decision
50 makers can evaluate which approach would create
51 the most desirable combination of benefits with
52 the fewest adverse effects on the park.

53 This section begins with a brief explanation of
54 general methods followed by a discussion of how
55 cumulative impacts are analyzed for the
56 alternatives. Following this section, the impact
57 analysis is presented. Each of the alternatives,
58 including the no action alternative (continuation
59 of current management), is analyzed for adverse or
60 positive changes that would occur to the existing
61 conditions of each impact topic as presented in the
62 affected environment chapter of this document.
63 After describing the impacts of the alternatives, the
64 cumulative impacts on each impact topic are
65 discussed.

66 **General Methods and Assumptions 67 for Analyzing Impacts**

68 This section describes the environmental impacts
69 for each alternative. The analysis assumes that the
70 monitoring and mitigation measures identified in
71 the alternative development section of this
72 document would be implemented for the action
73 alternative. Overall, the National Park Service
74 based its impact analyses and conclusions on
75 review of existing literature and park studies,
76 information provided by experts within the park
77 and other NPS personnel, other agencies,
78 professional judgment, park staff insights, and
79 public input.

80 In accordance with Council of Environmental
81 Quality (CEQ) regulations, direct, indirect, and
82 cumulative impacts are described (40 CFR
83 1502.16), and the impacts are assessed in terms of
84 context and intensity (40 CFR 1508.27). Where
85 appropriate, mitigating measures for adverse
86 impacts are described and incorporated into the
87 evaluation of impacts. The specific methods used
88 to assess impacts for each resource may vary and,
89 therefore, are described as part of each impact
90 topic.

1 The following terms are used in the discussion of
 2 environmental consequences to assess the impact
 3 intensity threshold and the nature of impacts
 4 associated with each alternative.

5 ■ **Type.** Impacts can be positive or adverse. A
 6 positive impact is an impact that would result
 7 in a favorable change in the condition or
 8 appearance of the resource. An adverse impact
 9 is an impact that causes an unfavorable result
 10 to the resource as compared with the existing
 11 conditions.

12 ■ **Context.** The significance of an action must
 13 be analyzed in several contexts such as society
 14 as a whole (human, national), the affected
 15 region, the affected interests, the locality and
 16 the park. Significance varies with the setting of
 17 the proposed action. For instance, in the case
 18 of a site-specific action, significance usually
 19 would depend on the effects in the locale
 20 rather than in the world as a whole. In many
 21 cases, the term “localized” is used, intending
 22 to provide the context that impacts would
 23 only occur within a relatively small area (i.e., a
 24 few acres) as opposed to throughout the park
 25 or into neighboring areas. The term “local” is
 26 used to reference the entire park. Both short-
 27 and long-term effects are also relevant.

28 ■ **Duration.** Duration of impact is analyzed
 29 independently for each resource because
 30 impact duration is dependent on the resource
 31 being analyzed. Impacts may last for the
 32 implementation period, a single year or
 33 growing season, or longer. Impact duration is
 34 described as short term, long term, or
 35 permanent for each resource. For the
 36 purposes of this analysis, short-term and long-
 37 term impacts are defined for each resource.

38 ■ **Direct and Indirect Impacts.** Effects can be
 39 direct, indirect, or cumulative. Direct effects
 40 are caused by an action and occur at the same
 41 time and place as the action. Indirect effects
 42 are caused by the action and occur later or
 43 further away but are still reasonably
 44 foreseeable. Direct and indirect impacts are
 45 considered in this analysis. Cumulative
 46 impacts are considered in this analysis.

47 ■ **Intensity.** This refers to the severity of impact.
 48 The following should be considered in
 49 evaluating intensity:

50 ○ Impacts that may be both positive and
 51 adverse. A significant effect may exist even
 52 if the federal agency believes that on
 53 balance the effect will be positive.

54 ○ The degree to which the proposed action
 55 affects public health or safety.

56 ○ Unique characteristics of the geographic
 57 area such as proximity to historic or
 58 cultural resources, park lands, prime
 59 farmlands, wetlands, wild and scenic
 60 rivers, or ecologically critical areas.

61 ○ The degree to which the effects on the
 62 quality of the human environment are
 63 likely to be highly controversial.

64 ○ The degree to which the possible effects
 65 on the human environment are highly
 66 uncertain or involve unique or unknown
 67 risks.

68 ○ The degree to which the action may
 69 establish a precedent for future actions
 70 having significant effects or represents a
 71 decision in principle about a future
 72 consideration.

73 ○ Whether the action is related to other
 74 actions that have individually insignificant
 75 but cumulatively significant impacts.
 76 Significance exists if it is reasonable to
 77 anticipate a cumulatively significant
 78 impact on the environment. Significance
 79 cannot be avoided by terming an action
 80 temporary or by breaking it down into
 81 small component parts.

82 ○ The degree to which the action may
 83 adversely affect districts, sites, highways,
 84 structures, or objects listed in, or eligible
 85 for listing in, the National Register or may
 86 cause loss or destruction of significant
 87 scientific, cultural, or historical resources.

- 1 o The degree to which the action may
- 2 adversely affect an endangered or
- 3 threatened species or its habitat that has
- 4 been determined to be critical under the
- 5 Endangered Species Act of 1973.

- 6 o Whether the action threatens a violation
- 7 of federal, state, or local law or
- 8 requirements imposed for protection of
- 9 the environment.

10 For each impact topic analyzed, an assessment of
11 the potential impacts according to context and
12 intensity is provided in the “Conclusion” section
13 that follows the discussion of the impacts under
14 each alternative. The intensity of the impacts is
15 presented using the relevant factors from the
16 preceding list. Intensity factors that do not apply
17 to a given resource topic and/or alternative are not
18 discussed.

19 **Climate Change**

20 The impacts of climate change on Perry’s Victory
21 and International Peace Memorial are not
22 expected to vary by alternative, and the lack of
23 certainty about regional climate change adds to the
24 difficulty of predicting how these impacts would
25 be realized. Furthermore, management actions
26 that are inherently part of each alternative would
27 not fundamentally change with the anticipated
28 added impacts of climate change. Climate change
29 is one factor among many that cause similar
30 outcomes between the alternatives, so
31 management actions would not likely be taken due
32 to climate change alone. Given this complexity, the
33 potential influences of these changes on the park
34 environment are not analyzed in detail with
35 respect to each alternative in this chapter. Please
36 refer to the discussion of carbon footprint topic in
37 the Chapter 1 section, “Impact Topics Considered
38 but Not Retained for Full Analysis.”

39 In June 2015, NPS developed and distributed a
40 brief entitled “Park Visitation and Climate
41 Change.” The brief states that:

42 climate change will affect not only natural and
43 cultural resources within national parks, but
44 also visitation patterns. Where, when, and how
45 many people visit parks is likely to change with

46 continued warming. Understanding potential
47 change in visitation based on historical trends
48 and future patterns of temperature change is a
49 crucial first step for park managers and local
50 communities to anticipate, plan for, and
51 proactively affect future visitation. A changing
52 climate is likely to have cascading and complex
53 effects on park visitation, management, and
54 local economies. Parks and surrounding
55 communities will need to adapt to both the
56 challenges and opportunities posed by
57 changing visitation.”

58 Park staff will use this information and further
59 research to base any required management
60 procedures due to changes in visitation. Further
61 concerns associated with climate change are the
62 potential rise in the water levels of Lake Erie and
63 potential effects of coastal wave action and
64 flooding.

65 **Impacts to Cultural Resources and** 66 **Section 106 of the National Historic** 67 **Preservation Act**

68 In this EA, impacts on cultural resources are
69 described in terms of type, context, duration and
70 intensity, which is consistent with the regulations
71 of the Council on Environmental Quality (CEQ)
72 that implement the National Environmental Policy
73 Act (NEPA). These impact analyses are intended,
74 however, to comply with the requirements of both
75 NEPA and Section 106 of the National Historic
76 Preservation Act. In accordance with the Advisory
77 Council on Historic Preservation’s regulations
78 implementing Section 106 (36CFR Part 800,
79 *Protection of Historic Properties*), impacts on
80 cultural resources were also identified and
81 evaluated by (1) determining the area of potential
82 effects; (2) identifying cultural resources present in
83 the area of potential effects that are either listed in
84 or eligible to be listed in the National Register of
85 Historic Places; (3) applying the criteria of adverse
86 effect to affected National Register eligible or
87 listed cultural resources; and (4) considering ways
88 to avoid, minimize, or mitigate adverse effects.

89 Under the Advisory Council’s regulations, a
90 determination of either *adverse effect* or *no adverse*
91 *effect* must be made for affected National Register
92 listed or eligible cultural resources. An *adverse*

1 *effect* occurs whenever an impact alters, directly or
 2 indirectly, any characteristic of a cultural resource
 3 that qualifies it for inclusion in the National
 4 Register, e.g., diminishing the historic integrity (or
 5 the extent to which a resource retains its historic
 6 appearance) of its location, design, setting,
 7 materials, workmanship, feeling, or association.
 8 Adverse effects also include reasonably
 9 foreseeable effects caused by the alternatives that
 10 would occur later in time, be farther removed in
 11 distance, or be cumulative (36 CFR 800.5,
 12 *Assessment of Adverse Effects*). A determination of
 13 *no adverse effect* means there is an effect but the
 14 effect would not diminish the characteristics of the
 15 cultural resource that qualify it for inclusion in the
 16 National Register of Historic Places

17 CEQ regulations and the National Park Service's
 18 *Conservation Planning, Environmental Impact*
 19 *Analysis and Decision Making* (Director's Order
 20 #12) also call for a discussion of mitigation, as well
 21 as an analysis of how effective the mitigation
 22 would be in reducing the intensity of a potential
 23 impact, e.g., reducing the intensity of an impact
 24 from major to moderate or minor.

25 Any resultant reduction in intensity of impact due
 26 to mitigation; however, is an estimate of the
 27 effectiveness of mitigation only under NEPA. It
 28 does not suggest that the level of effect as defined
 29 by Section 106 is similarly reduced. Cultural
 30 resources are nonrenewable resources, and
 31 adverse effects generally consume, diminish, or
 32 destroy the original historic materials or form,
 33 resulting in a loss in the integrity of the resource
 34 that can never be recovered. Therefore, actions
 35 determined to have an adverse effect under
 36 Section 106 may be mitigated but the effect can
 37 remain adverse.

38 A section 106 summary is included, as appropriate,
 39 in the impact analysis sections. Section 106
 40 summary is an assessment of the effect of the
 41 undertaking (implementation of the alternative)
 42 on National Register of Historic Places eligible or
 43 listed cultural resources only, based upon the
 44 criterion of adverse effect and no adverse effect
 45 found in the Advisory Council's regulations.

46 **Cumulative Impacts Analysis**

47 **Method**

48 **Definition**

49 The CEQ regulations require assessment of
 50 cumulative impacts in the decision-making
 51 process for federal projects. A cumulative impact is
 52 defined as "the impact on the environment which
 53 results from the incremental impact of the action
 54 when added to other past, present, and reasonably
 55 foreseeable future actions regardless of what
 56 agency (federal or nonfederal) or person
 57 undertakes such other actions" (40 CFR 1508.7).
 58 Cumulative impacts are considered for all
 59 alternatives, including the no-action alternative.
 60 Cumulative impacts can result from individually
 61 minor, but collectively positive or adverse actions
 62 taking place over a period of time.

63 **Methods for Assessing Cumulative Impacts**

64 Cumulative impacts were determined by
 65 combining the impacts of the action alternative
 66 and the no action alternative with other past,
 67 present, and reasonable foreseeable future action.
 68 Past actions include activities that influenced and
 69 affected the current conditions of the environment
 70 near the project area. Ongoing or reasonably
 71 foreseeable future projects near the park or the
 72 surrounding region might contribute to
 73 cumulative impacts. The geographic scope of the
 74 analysis includes actions in the project area as well
 75 as other actions in the park or surrounding lands,
 76 where overlapping resource impacts are possible.
 77 Once identified, past, present, and reasonably
 78 foreseeable actions are then assessed in
 79 conjunction with the impacts of the alternatives to
 80 determine if they would have any added adverse or
 81 positive impacts on a particular resource, human
 82 health and safety, or visitor use and experience.
 83 The impacts of past, present and reasonably
 84 foreseeable actions vary for each resource.
 85 Cumulative impacts are considered for each
 86 alternative and are presented in the environmental
 87 consequences discuss for each impact topic.

1 **Actions and Projects Inside Perry’s**
2 **Victory and International Peace**
3 **Memorial**

4 In order to determine the potential cumulative
5 impacts, the following existing and anticipated
6 present and future projects at Perry’s Victory and
7 International Peace Memorial were taken into
8 consideration:

- 9 ▪ Past, present, and ongoing vegetation
10 management including: mowing the expanse
11 of lawn in the historic core and the
12 housing/maintenance management zones and
13 pruning, shearing, and general tree and shrub
14 maintenance;
- 15 ▪ Past, present and future projects associated
16 with expanded interpretation and placement
17 of interpretive waysides and associated
18 collateral infrastructure such as paving and
19 viewsheds;
- 20 ▪ Past, present and future projects associated
21 with improvements to accessibility to primary
22 visitor use facilities;
- 23 ▪ Currently in progress (2017 season) is
24 repointing of the Memorial column – PMIS
25 210919. With completion of this project, the
26 memorial column itself should be in good
27 condition for the long term.
- 28 ▪ Upper plaza: Value Analysis (PMIS 200284)
29 was completed in 2015. This is a high priority
30 item for the park, so that the Upper Plaza can
31 be returned to full public use. The park may
32 also implement mechanical improvements
33 (e.g., geothermal heating) as part of the same
34 project.
- 35 ▪ Seawalls: The condition assessment report
36 completed in February 2017; park would like
37 to have this as a Line Item Construction
38 project to repair and restore the north (1900’)
39 and south (1500’) seawalls within the park in
40 the next five years.
- 41 ▪ Park Accessibility Plan, currently underway
42 and scheduled to be completed in 2018.

43 **Actions and Projects Outside Perry’s**
44 **Victory and International Peace**
45 **Memorial**

46 One specific project outside Perry’s Victory and
47 International Peace Memorial was identified by
48 park staff. A boat dock was recently constructed
49 immediately south of the bathing beach.
50 Reasonably foreseeable impacts from additional
51 projects outside the park might be associated with
52 road expansion along the park boundaries and
53 development of the land that surrounds the park.

54 **Natural Resources**

55 **Soils and Geology**

56 **ALTERNATIVE 1: (NO ACTION)**

57 Impacts

58 Within this alternative, there would be no changes
59 to current conditions. Existing management or
60 maintenance strategies would remain in place and
61 include controlling erosion and deposition of
62 sediment, limiting visitor access, and avoiding
63 construction of new features or facilities that
64 might cause soil conditions or stability to change
65 or accelerate. Current mitigation measures for
66 sensitive natural resources would remain in place
67 and include soils and geology. There would be no
68 adverse impacts to soils and geology resources
69 with the implementation of this alternative.

70 Cumulative Impacts

71 There are a number of past, ongoing, and
72 reasonably foreseeable projects occurring or
73 proposed within the park. None would have an
74 adverse impact on soils and geology. The
75 incremental impact of the no action alternative
76 when added to other past, present, and reasonably
77 foreseeable future actions would be negligible.

78 Conclusion

79 The No Action Alternative would not modify the
80 existing soils or geology conditions at Perry’s
81 Victory and International Peace Memorial. No
82 adverse impacts to soil and geologic resources
83 would be expected.

1 **ALTERNATIVE 2: (PROPOSED ACTION)**

2 Impacts

3 Due to construction projects introduced within
4 this alternative, soils would be disturbed by the
5 development, but cut and fill activity would be
6 minimal and spread over the park acreage. In
7 Alternative 2, the introduction of impervious
8 materials would exceed that of Alternative 3. The
9 soils that would be disturbed by demolition and
10 development are extensive but they are fill soils,
11 previously added on park management zones and
12 specifically in the historic core. Cut and fill
13 amounts would be balanced to the extent possible
14 to minimize the need to import or export soils
15 during construction. Additionally, under
16 Alternative 2, the cut and fill of soils on the
17 grounds would be designed to result in no net
18 change in the soil loads surrounding the
19 Memorial. Overall, the implementation of
20 Alternative 2 would have short-term and minor
21 impacts on existing soil conditions at the park.

22 The generally flat topography of the park would be
23 retained in Alternative 2, diminishing potential
24 increase of erosion on the landscape. During
25 demolition of existing sidewalks and construction
26 of new ones, temporary impacts to soils from
27 erosion would be minimized by implementation
28 measures listed below. Project phasing would aid
29 in mitigation of the extent of soil disturbed at one
30 time.

31 Mitigation

- 32 ▪ In order to minimize the potential for
33 temporary erosion impacts to soils during
34 construction, erosion and sediment control
35 measures would be implemented for each
36 project undertaken for construction.
- 37 ▪ In order to minimize the potential for long-
38 term impacts to soils, a strategy for
39 implementation priorities and phasing of the
40 proposed actions to allow sufficient time for
41 re-stabilization of soils would be developed
42 after completion of each phase.
- 43 ▪ When soil excavation is an unavoidable part of
44 an approved facility development project, NPS

45 would minimize soil excavation, erosion, and
46 offsite soils migration during and after the
47 activity.

- 48 ▪ An Erosion and Sediment Control Plan would
49 be developed before starting the project,
50 including the specific practices to be
51 implemented for controlling erosion and
52 preventing management-caused sediment
53 from reaching the drainage. Compliance
54 would be ensured by frequent inspections.

55 Cumulative Impacts

56 There are a number of past, ongoing, and
57 reasonably foreseeable projects occurring or
58 proposed within the park. None would have an
59 adverse impact on soils and geology. The
60 incremental impact of the action alternative when
61 added to other past, present, and reasonably
62 foreseeable future impacts would be localized by
63 use of project phasing.

64 Conclusion

65 There would be a number of disruptions to surface
66 soils due to the proposed actions in this
67 alternative. The result would be short-term minor
68 adverse impacts to soils. Most impacts would be
69 localized due to project phasing. Long-term
70 positive impacts to soils would be expected due
71 soil stabilization, design of walkway alignments to
72 avoid slopes and minimal ongoing soil erosion
73 maintenance associated with all park project
74 activities.

75 **ALTERNATIVE 3: (PROPOSED ACTION NPS- 76 PREFERRED)**

77 Impacts

78 Due to construction projects introduced within
79 this alternative, soils would be disturbed by the
80 development, but cut and fill activity would be
81 minimal and spread over the park acreage. The
82 soils that would be disturbed by the development
83 are fill soils that were previously added on park
84 management zones and specifically in the historic.
85 Cut and fill amounts would be balanced to the
86 extent possible to minimize the need to import or
87 export soils during construction. Additionally,
88 under Alternative 3, the cut and fill of soils on the

1 grounds would be designed to result in no net
2 change in the soil loads surrounding the
3 Memorial. Overall, the implementation of
4 Alternative 3 would have short-term and minor
5 impacts on existing soil conditions at the park.

6 The generally flat topography of the park would be
7 retained in Alternative 3 diminishing the potential
8 for erosion on the landscape. During construction,
9 temporary impacts to soils from erosion would be
10 minimized by implementation measures listed
11 below.

12 Mitigation

- 13 ■ In order to minimize the potential for
14 temporary erosion impacts to soils during
15 construction, erosion and sediment control
16 measures would be implemented for each
17 project undertaken for construction.
- 18 ■ In order to minimize the potential for long-
19 term impacts to soils, a strategy would be
20 developed for implementation priorities and
21 phasing of the proposed actions to allow
22 sufficient time for re-stabilization of soils after
23 completion of each phase.
- 24 ■ When soil excavation is an unavoidable part of
25 an approved facility development project, NPS
26 would minimize soil excavation, erosion, and
27 offsite soils migration during and after the
28 activity.
- 29 ■ In order to minimize or help limit spread of
30 invasive plants, sterile soils would be
31 implemented for each project undertaken for
32 construction. Sterile soils have undergone heat
33 or chemical processing to kill any pathogens
34 and seeds that are in it. Sterile soil would be
35 less likely to spread diseases or weeds.
- 36 ■ An Erosion and Sediment Control Plan would
37 be developed before starting the project.
38 Included would be specific practices for
39 controlling erosion and preventing
40 management-caused sediment from reaching
41 the drainage. Compliance would be ensured
42 by frequent inspections.

43 Cumulative Impacts

44 There are a number of past, ongoing, and
45 reasonably foreseeable projects occurring or
46 proposed within the park. None would have an
47 adverse impact on soils and geology. The
48 incremental impact of the action alternative when
49 added to other past, present, and reasonably
50 foreseeable future impacts would be localized by
51 use of project phasing.

52 Conclusion

53 There would be a number of disruptions to surface
54 soils due to the proposed actions in this
55 alternative. The result would be short-term minor
56 adverse impacts to soils. Most impacts would be
57 localized due to project phasing. Long-term
58 positive impacts to soils would be expected due to
59 soil stabilization, design of walkway alignments to
60 avoid slopes, and minimal ongoing soil erosion
61 maintenance associated with all park project
62 activities.

63 **Water Resources/Floodplains**

64 **ALTERNATIVE 1 (NO ACTION)**

65 Impacts

66 Protection of floodplains would continue with the
67 current management and maintenance strategies
68 in place and the planned repair and restoration of
69 the seawalls. The No Action Alternative would be
70 a continuation of existing conditions, operations,
71 and maintenance of the park. The functional value
72 of the floodplain includes some flood storage, but
73 overall its value is low because it is a relatively
74 small area (25 acres) and contains impervious
75 paving. The No Action Alternative would have no
76 additional impacts on the water surface level
77 during a flood event or on flood frequency, and
78 the existing floodplains function would remain
79 unchanged. Therefore, the No Action Alternative
80 would have no adverse impacts on the 100-year
81 floodplain within the park.

82 Cumulative Impacts

83 There are a number of past, ongoing, and
84 reasonably foreseeable projects occurring or
85 proposed within the park. None would have an
86 impact on water resources and floodplains. The

1 incremental impact of the no action alternative
 2 when added to other past, present, and reasonably
 3 foreseeable future actions would be short-term,
 4 and negligible.

5 Conclusion

6 Implementation of the No Action alternative
 7 would have no adverse impacts on water resources
 8 and floodplains and would not contribute to
 9 cumulative impacts.

10 **ALTERNATIVE 2 (PROPOSED ACTION)**

11 Impacts

12 Implementation of Alternative 2 would require
 13 ground disturbance during construction of the
 14 circulation system, the Peace Garden, pavilion
 15 structures, and housing/administration facilities.
 16 Construction would not have a measurable effect
 17 on the frequency, elevation, intensity or duration
 18 of floods, but the function of the floodplain which
 19 includes some flood storage, would be diminished,
 20 due to removal of grass cover or other vegetation
 21 during construction. Therefore, some vegetation
 22 would not be in place during construction to slow
 23 floodwater which would result in an increased risk
 24 of soil loss during a flood event. The functional
 25 value of the floodplain within the park includes
 26 some flood storage, but overall its value would be
 27 low because it is a relatively small area and
 28 contains impervious materials. In order to protect
 29 the function of the floodplain during construction,
 30 erosion and sediment control would be employed.

31 Proposed modification of the mostly landscaped
 32 area in the 100- year floodplain of the park would
 33 not be land contributing to the productivity of a
 34 floodplain ecosystem. The historic core and other
 35 management zones of the park have been
 36 excavated and filled due to construction of
 37 circulation and facilities. The historic core has
 38 been filled repeatedly since construction of the
 39 Memorial in 1915. Therefore, construction
 40 activities within alternative 2 would result in short-
 41 term minor adverse impacts to surface water and
 42 floodplains.

43 Analysis of National Wetlands Inventory
 44 information has indicated that Alternative 2 would
 45 not disturb land that contains wetlands.

46 Mitigation

- 47 ▪ In compliance with the *1987 Standards for Soil*
 48 *Erosion and Sediment Control*, erosion and
 49 sediment control measures would be
 50 implemented to avoid or minimize the
 51 potential for sedimentation and
 52 contamination impacts to surface waters due
 53 to development of the proposed project.
- 54 ▪ To reduce the potential for erosion, and to
 55 accelerate the re-establishment of vegetation,
 56 disturbed or denuded areas would be re-
 57 vegetated upon completion of construction
 58 operations.
- 59 ▪ To further reduce the potential for
 60 sedimentation and contamination impacts to
 61 surface waters, proposed impervious surface
 62 features such as walking paths would be
 63 designed to minimize surface areas to the
 64 extent practicable.
- 65 ▪ Extensive and detailed geotechnical
 66 investigations and calculations would be
 67 undertaken prior to initiation of construction.
- 68 ▪ Cut and fill amounts would be balanced to
 69 minimize the need for import or export of soil.
- 70 ▪ Plan and schedule all construction activities to
 71 prevent erosion and sedimentation, which
 72 would cause possible adverse impacts to water
 73 resources and floodplains.
- 74 ▪ Construction would be halted during times
 75 when soils would be too wet for equipment to
 76 operate without increasing the potential for
 77 water resource degradation.

78 Cumulative Impacts

79 There are a number of past, ongoing, and
 80 reasonably foreseeable projects occurring or
 81 proposed within the park. None would have an
 82 impact on water resources and floodplains. The
 83 incremental impact of Alternative 2 when added to

1 other past, present, and reasonably foreseeable
2 future actions would be short-term and minor due
3 construction actions within the alternative. Short-
4 term minor adverse impacts within Alternative 2
5 would contribute slightly to a cumulative minor
6 adverse impact.

7 Conclusion

8 There would be short-term minor adverse impacts
9 to water resources with the implementation of
10 Alternative 2. Contributing to the minor adverse
11 impacts are the construction of the expanded
12 circulation system and new facilities within the
13 park.

14 **ALTERNATIVE 3: (PROPOSED ACTION AND** 15 **NPS-PREFERRED)**

16 Impacts

17 Implementation of Alternative 3 would require
18 ground disturbance during construction of the
19 circulation system, the Peace Garden, pavilion
20 structures, and housing/administration facilities.
21 Construction would not have a measurable effect
22 on the frequency, elevation, intensity or duration
23 of floods, but the function of the floodplain which
24 includes some flood storage, would be diminished,
25 due to removal of grass cover or other vegetation
26 during construction. Therefore, some vegetation
27 would not be in place during construction to slow
28 floodwater which would result in an increased risk
29 of soil loss during a flood event. The functional
30 value of the floodplain within the park includes
31 some flood storage, but overall its value would be
32 low because it is a relatively small area and
33 contains impervious materials. In order to protect
34 the function of the floodplain during construction,
35 erosion and sediment control would be employed.

36 Proposed modification of the mostly landscaped
37 area in the 100- year floodplain of the park would
38 not be land contributing to the productivity of a
39 floodplain ecosystem. The historic core and other
40 management zones of the park have been
41 excavated and filled due to construction of
42 circulation and facilities. The historic core has
43 been filled repeatedly since construction of the
44 Memorial in 1915. Therefore, construction
45 activities within Alternative 3 would result in

46 short-term minor adverse impacts to surface water
47 and floodplains.

48 Analysis of National Wetland Inventory (NWI)
49 information has indicated that Alternative 3 would
50 not disturb land that contains wetlands.

51 Mitigation

- 52 ▪ In compliance with the *1987 Standards for Soil*
53 *Erosion and Sediment Control*, erosion and
54 sediment control measures would be
55 implemented to avoid or minimize the
56 potential for sedimentation and
57 contamination impacts to surface waters due
58 to development of the proposed project.
- 59 ▪ To reduce the potential for erosion, and to
60 accelerate the re-establishment of vegetation,
61 disturbed or denuded areas would be re-
62 vegetated upon completion of construction
63 operations.
- 64 ▪ To further reduce the potential for
65 sedimentation and contamination impacts to
66 surface waters, proposed impervious surface
67 features such as walking paths would be
68 designed to minimize surface areas to the
69 extent practicable.
- 70 ▪ Extensive and detailed geotechnical
71 investigations and calculations would be
72 undertaken prior to initiation of construction.
- 73 ▪ Cut and fill amounts would be balanced to
74 minimize the need for import or export of soil.
- 75 ▪ Plan and schedule all construction activities to
76 prevent erosion and sedimentation, which
77 would cause possible adverse impacts to water
78 resources and floodplains.

79 Cumulative Impacts

80 There are a number of past, ongoing, and
81 reasonably foreseeable projects occurring or
82 proposed within the park. None would have an
83 impact on water resources and floodplains. The
84 incremental impact of Alternative 2 when added to
85 other past, present, and reasonably foreseeable
86 future actions would be short-term and minor due

1 construction actions within the alternative. Short-
2 term minor adverse impacts within Alternative 3
3 would contribute slightly to a cumulative minor
4 adverse impact.

5 Conclusion

6 There would be short-term minor adverse impacts
7 to water resources with the implementation of
8 Alternative 3. Contributing to the minor adverse
9 impacts would be the construction of the
10 expanded circulation system and new facilities
11 within the park.

12 **Vegetation**

13 **ALTERNATIVE 1 (NO ACTION)**

14 Impacts

15 The park is landscaped with cultivated lawn
16 grasses and ornamental shrubs and trees and is
17 maintained regularly. Due to poor drainage on the
18 site, standing water has caused the propagation of
19 noxious weeds and undesirable broad-leaved
20 grasses. Current mowing and vegetation
21 management and maintenance regimes within this
22 alternative, including turf management would
23 remain in place. These regimes are not guided by a
24 comprehensive landscape maintenance program
25 for the park. The No Action Alternative would not
26 modify the existing conditions at the park.
27 Therefore, the implementation of Alternative 1
28 would result in long-term minor adverse impacts
29 to vegetation.

30 Within the No Action alternative, current
31 vegetation management not associated with a
32 comprehensive management and maintenance
33 program would have a direct and long-term
34 moderate adverse impact on vegetation.

35 Cumulative Impacts

36 There are a number of past, ongoing, and
37 reasonably foreseeable projects occurring or
38 proposed within the park, some of which would
39 have short-term minor adverse impacts on
40 vegetation. The incremental impact of the no
41 action alternative when added to other past,
42 present, and reasonably foreseeable future actions
43 would result in long-term adverse impacts due to

44 lack of implemented vegetation management
45 strategies.

46 Conclusion

47 Implementation of the No Action alternative
48 would have long-term minor adverse impact on
49 vegetation due to the lack of vegetation
50 management strategies associated with specific
51 vegetation and turf species and the introduction of
52 invasive species.

53 **ALTERNATIVE 2 (PROPOSED ACTION)**

54 Impacts

55 Specific actions resulting from the implementation
56 of Alternative 2 and associated potential impacts
57 on vegetation would include: major addition of
58 trees on the east and west of the historic core;
59 introduction of trees within the Peace garden and
60 in the vicinity of the visitor center; introduction of
61 low ground cover or shrubs to protect the berm
62 around the lower plaza from erosion; and, trees
63 placed strategically along the curvilinear
64 pedestrian walkway system. The area of the Peace
65 Garden is currently all turf with two trees. These
66 trees would be removed in this alternative. The
67 Austrian pines would be removed in this
68 alternative due to the plaza reconstruction project
69 that will occur in the near future. Existing trees in
70 the island of the entrance loop drive west of the
71 visitor center would be removed to give greater
72 visibility to the front door of the visitor center. The
73 island would retain the beds of colorful annuals
74 and perennials. The majority of existing trees on
75 the site would be retained and integrated into the
76 proposed new plantings in this alternative. Other
77 proposed actions would include construction of
78 an expanded pedestrian circulation system and
79 new park building facilities. Alternative 2 would
80 have a long-term positive impact on vegetation
81 due to recommendations in the CLTP and
82 introduction of new vegetation that would
83 enhance the visitor experience and the overall
84 historic character of the park.

85 There would be short-term minor impacts to the
86 turf and a limited amount of trees due to project
87 construction and demolition of some of the
88 existing walkway system. Mitigation measures for

1 vegetation and turf protection would be
2 implemented to avoid long-term impacts that
3 extend beyond the duration of the project.

4 Cumulative Impacts

5 There are a number of past, ongoing, and
6 reasonably foreseeable projects occurring or
7 proposed within the park. Some would have short-
8 term adverse impacts on vegetation. The
9 incremental impact of Alternative 2 when added to
10 other past, present, and reasonably foreseeable
11 future actions would be long term and positive due
12 to implementation of a vegetation management
13 and maintenance program and strategies for
14 removal and replacement of trees within the park.

15 Conclusion

16 There would be long-term positive impacts on
17 vegetation within this alternative. Mitigation
18 measures would be required to ensure the short-
19 term adverse impacts would not become long-
20 term adverse impacts. These actions would have a
21 long-term and positive impact on vegetation.

22 **ALTERNATIVE 3: (PROPOSED ACTION AND** 23 **NPS-PREFERRED)**

24 Impacts

25 Specific actions resulting from the implementation
26 of Alternative 3 and associated potential impacts
27 on vegetation would include: major addition of
28 trees on the east and west of the historic core;
29 introduction of trees within the Peace garden and
30 in the vicinity of the visitor center; introduction of
31 low ground cover or shrubs to protect the berm
32 around the Memorial plazas; introduction of trees
33 flanking the Memorial to replace the Austrian
34 pines; and trees placed strategically along the
35 rectangular pedestrian walkway system. The area
36 of the Peace Garden is currently planted with turf
37 and two trees. These trees would be removed in
38 this alternative. The Austrian pines would be
39 removed in this alternative due to the plaza
40 reconstruction project in the near future. Existing
41 trees in the entrance loop drive west of the visitor
42 center would be removed for greater visibility to
43 the front door of the visitor center. The island
44 would retain a variety of colorful annuals,
45 perennials, and grasses. The majority of existing

46 trees would remain within the park. Proposed new
47 trees would be integrated into the existing tree
48 patterns. Other proposed actions would include
49 construction of an expanded pedestrian
50 circulation system and new park building facilities.
51 Alternative 3 would have a long-term positive
52 impact on vegetation due to the introduction of
53 new vegetation that would enhance the visitor
54 experience and the overall historic character of the
55 park.

56 There would be short-term minor impacts to the
57 turf and a limited amount of trees due to project
58 construction and demolition of some of the
59 existing walkway system. Mitigation measures for
60 vegetation and turf protection would be
61 implemented to avoid long-term impacts that
62 extend beyond the duration of the project.

63 Cumulative Impacts

64 There are a number of past, ongoing, and
65 reasonably foreseeable projects occurring or
66 proposed within the park. Some would have short-
67 term adverse impacts on vegetation. The
68 incremental impact of Alternative 3 when added to
69 other past, present, and reasonably foreseeable
70 future actions would be long term and positive due
71 to implementation of a vegetation management
72 and maintenance program and strategies for
73 removal and replacement of trees within the park.

74 Conclusion

75 There would be long-term positive impacts on
76 vegetation within Alternative 3. Mitigation
77 measures would be required to ensure the short-
78 term adverse impacts would not become long-
79 term adverse impacts. These actions would have a
80 long-term and positive impact on vegetation.

81 **Wildlife**

82 **ALTERNATIVE 1 (NO ACTION)**

83 Impacts

84 Continued management and maintenance policies
85 associated with the No Action Alternative would
86 not modify the existing conditions at the park of
87 bird, mammal, reptile and aquatic populations or
88 their habitat. Current habitat vegetation would
89 many species of birds, as do many of the Lake Erie

1 Islands, including Kelley’s Island, Middle Bass
 2 Island, North Bass Island and Gibraltar Island.
 3 Implementation of Alternative 1 would result in
 4 negligible adverse impacts to wildlife.

5 Cumulative Impacts

6 There are a number of past, ongoing, and
 7 reasonably foreseeable projects occurring or
 8 proposed within the park. Some would have short-
 9 term minor impacts on wildlife. The incremental
 10 impact of the no action alternative when added to
 11 other past, present, and reasonably foreseeable
 12 future actions would be negligible.

13 Conclusion

14 The No Action Alternative would not modify
 15 wildlife or critical habitat at Perry’s Victory and
 16 International Peace Memorial. No direct or
 17 adverse impacts to this resource would be
 18 expected.

19 **ALTERNATIVE 2 (PROPOSED ACTION)**

20 Impacts

21 Specific actions resulting from the implementation
 22 of this alternative and associated with potential
 23 impacts on wildlife and wildlife habitat would
 24 include: introduction of ground cover or low
 25 shrubs on the berm surrounding the lower plaza;
 26 and proposed tree plantings east and west of the
 27 historic core of the park. These two actions would
 28 afford expanded habitat for a diversity of wildlife
 29 species including birds, butterflies, moths and
 30 snakes. Within the development of the Peace
 31 Garden there would be opportunity to introduce
 32 specific plant materials that attract butterflies and
 33 provide habitat. These actions would have a
 34 positive impact on wildlife extending far into the
 35 future of the park.

36 Specific actions resulting from the implementation
 37 of Alternative 2 would have a negligible, short term
 38 adverse impact on wildlife due to localized impacts
 39 from additional proposed projects in distinct areas
 40 of the park, short duration of project construction,
 41 and prioritized phasing of projects.

42 Cumulative Impacts

43 There are a number of past, ongoing, and
 44 reasonably foreseeable projects occurring or
 45 proposed within the park. Some would have
 46 negligible impacts on wildlife. The incremental
 47 impact of Alternative 2, when added to other past,
 48 present, and reasonably foreseeable future actions
 49 would be long-term and positive.

50 Conclusion

51 There would be no long-term adverse impacts on
 52 wildlife and wildlife habitat from implementation
 53 of this alternative. Most impacts would be
 54 localized and positive and associated with specific
 55 vegetation proposed for the park.

56 **ALTERNATIVE 3: (PROPOSED ACTION AND 57 NPS-PREFERRED)**

58 Impacts

59 Specific actions resulting from the implementation
 60 of this alternative and associated with potential
 61 impacts on wildlife and wildlife habitat would
 62 include: introduction of ground cover or low
 63 shrubs on the berm surrounding the lower plaza;
 64 and proposed tree plantings east and west of the
 65 historic core. These two actions would afford
 66 expanded habitat for a diversity of wildlife species
 67 including birds, butterflies, moths and snakes.
 68 Development of the Peace Garden would present
 69 an opportunity to introduce plant materials that
 70 attract butterflies and provide habitat. These
 71 actions would have a positive impact on wildlife
 72 extending far into the future of the park.

73 Specific actions resulting from the implementation
 74 of Alternative 3 would have a negligible, short term
 75 impact on wildlife due to localized impacts from
 76 additional proposed projects in distinct areas of
 77 the park, short duration of project construction,
 78 and prioritized phasing of projects.

79 Cumulative Impacts

80 There are a number of past, ongoing, and
 81 reasonably foreseeable projects occurring or
 82 proposed within the park. Most would have
 83 negligible impacts on wildlife. The incremental
 84 impact of Alternative 3, when added to other past,

1 present, and reasonably foreseeable future actions
2 would be long-term and positive.

3 Conclusion

4 There would be no long-term adverse impacts on
5 wildlife and wildlife habitat from implementation
6 of this alternative. Most impacts would be
7 localized and positive and associated with specific
8 vegetation proposed for the park.

9 **Threatened and Endangered Species**

10 **ALTERNATIVE 1 (NO ACTION)**

11 Impacts

12 During informal consultation with U.S. Fish and
13 Wildlife Service (USFWS) the following comments
14 were given to the park pursuant to the Fish and
15 Wildlife Coordination Act (16 U.S.C.661 et seq.),
16 National Environmental Policy Act of 1969 (42
17 U.S.C. 4321-4347), and the Endangered Species
18 Act of 1973, as amended (16 U.S.C. 1531-1544).
19 The Lake Erie islands provide important migration
20 and stopover habitat for monarchs as they fly
21 between the U.S., Mexico and Canada – a journey
22 of over 3,000 miles. This journey has become more
23 perilous for many monarchs because of threats
24 along their migratory paths and on their breeding
25 and wintering grounds. Monarch population have
26 declined significantly in recent years. Threats
27 include habitat loss – particularly the loss of
28 milkweed, the monarch caterpillar’s sole food
29 source – and mortality resulting from pesticide
30 use. The park is within the range of the monarch
31 butterfly. USFWS has determined that listing
32 under ESA may be warranted.

33 The state of Ohio lies within range of the Federally
34 endangered Indiana bat (*Myotis sodalists*) and the
35 federally threatened northern long-eared bat
36 (*Myotis septentrionalis*). The park also lies in the
37 range of the Lake Erie watersnake (*Nerodia*
38 *sipedon insularum*) and the kirtland warbler
39 (*Septophaga kirtlandil*). There would be no
40 disturbance within Alternative 1 to these species
41 or their supporting habitat. Rare and endangered
42 plant species occur within wetlands and mudflats
43 in the shoreline areas of the Lake Erie islands. No
44 threatened or rare plant species are found within
45 the boundary of the park. Therefore, in Alternative

46 1 there are no adverse impacts to rare, endangered
47 and threatened species within the park.

48 Cumulative Impacts

49 There are a number of past, ongoing, and
50 reasonably foreseeable projects occurring or
51 proposed within the park. The restoration of the
52 seawalls would occur in the next five years. This
53 project would have the potential to disturb
54 shoreline edges and thus habitat for the
55 watersnake. Therefore, there would be short term
56 (duration of the project for a year or 18 months)
57 minor adverse impact on the species. The viability
58 of the population would not be affected. The
59 incremental impact of the no action alternative
60 when added to this future action would be a
61 negligible.

62 Conclusion

63 Within the No Action Alternative, there would be
64 no disturbance to vegetation habitats for identified
65 species of concern and therefore no adverse
66 impact to this resource. During the
67 implementation of the seawall restoration, habitat
68 for the watersnake could be disturbed, but
69 Alternative 1 does not add an adverse incremental
70 impact to the negligible effect of the seawall
71 project.

72 **ALTERNATIVE 2 (PROPOSED ACTION)**

73 Impacts

74 Specific actions resulting from construction of
75 circulation and facilities in Alternative 2 would
76 have a short-term (time of the construction
77 implementation) minor adverse impact on rare,
78 threatened and endangered species. The viability
79 of biotic populations of concern would not be
80 impacted and the community if left alone would
81 recover. Also, Alternative 2 would result in long-
82 term (life of the proposed vegetation) positive
83 impact on rare, threatened and endangered
84 species due to tree plantings over the entire park
85 and a variety of other plant species within the
86 Peace garden. Plantings would include milkweed
87 to support and attract the Monarch butterflies by
88 addition of critical habitat.

1 Cumulative Impacts

2 There are a number of past, ongoing, and
3 reasonably foreseeable projects occurring or
4 proposed within the park. None would have an
5 impact on rare, threatened, or endangered species.
6 The incremental impact of Alternative 2 when
7 added to other past, present, and reasonably
8 foreseeable future actions would be long term and
9 positive due to vegetation management and
10 addition of critical wildlife habitat.

11 Conclusion

12 The proposed vegetation management and
13 maintenance and supporting vegetation habitat
14 would have a long-term and positive impact on
15 rare, threatened and endangered species.

16 **ALTERNATIVE 3: (PROPOSED ACTION AND 17 NPS-PREFERRED)**

18 Impacts

19 Specific actions resulting from construction of
20 circulation and facilities in Alternative 3 would
21 have a short-term (time of the construction
22 implementation) minor adverse impact on rare,
23 threatened and endangered species. The viability
24 of biotic populations of concern would not be
25 impacted and the community if left alone would
26 recover. Also, Alternative 3 would result in long-
27 term (life of the proposed vegetation) positive
28 impact on rare, threatened and endangered
29 species due to tree plantings over the entire park
30 and a variety of other plant species within the
31 Peace Garden. Plantings would include milkweed
32 to support and attract the Monarch butterflies by
33 addition of critical habitat.

34 Cumulative Impacts

35 There are a number of past, ongoing, and
36 reasonably foreseeable projects occurring or
37 proposed within the park. None would have an
38 impact on rare, threatened, or endangered species.
39 The incremental impact of Alternative 3 when
40 added to other past, present, and reasonably
41 foreseeable future actions would be long term and
42 positive due to vegetation management and
43 addition of critical wildlife habitat.

44 Conclusion

45 The proposed vegetation management and
46 maintenance and supporting vegetation habitat
47 would have a long-term and positive impact on
48 rare, threatened and endangered species.

49 **Cultural Resources**

50 **Historic Buildings and Structures**

51 **ALTERNATIVE 1 (NO ACTION)**

52 Impacts

53 Current management regimes within Alternative 1
54 would continue and include repair and
55 maintenance to historic buildings and structures at
56 Perry's Victory and International Peace Memorial.
57 This would include maintenance and management
58 of the Memorial column, plazas, steps, walls and
59 associated granite benches and urns. There would
60 be continued cyclical repair work on the lower
61 plaza in order to repoint selected paving joints.
62 Similar management and maintenance would
63 continue for the Men's Dormitory building and
64 the Rangers Operations Center. The Rangers
65 Operation Center is a non-contributing feature to
66 the historic integrity of the site. It would not
67 require management as a historic building. A
68 project is currently underway to repair/repoint the
69 column and an upcoming project would
70 rehabilitate the upper plaza of the Memorial.
71 Within this alternative, there would continue to be
72 no ABAAS access to the Memorial plazas or the
73 column. The park would continue to adhere to the
74 policy of not providing ABAAS accessibility
75 standards for the column and observation
76 platform. Within this alternative, there would be
77 limited programmatic accessibility at the visitor
78 center or elsewhere within the park to give
79 disabled visitors a commensurate experience of
80 the views that are essential to interpretation from
81 the observation platform of the column.
82 Alternative 1 would have no adverse impact on the
83 physical structure of historic buildings and
84 structures within the park. (See visitor use and
85 experience for further analysis associated with
86 current ABAAS accessibility for historic features of
87 the park.)

1 Section 106 Summary

2 NHPA section 106 regulations apply only to
3 properties that meet the eligibility requirements of
4 the National Register. Therefore, assessment of
5 NHPA section 106 effects applies only to those
6 historic structures/cultural landscape features that
7 are listed on the National Register or those that
8 meet National Register criteria for listing. The
9 application of the Advisory Council criteria of
10 adverse effects (36 CFR 800.5 “Assessment of
11 Adverse Effects”) has been completed.

12 For purposes of Section 106 compliance there
13 would be **no adverse effect** on Historic Buildings
14 and Structures.

15 Cumulative Impacts

16 There are a number of past, ongoing, and
17 reasonably foreseeable projects occurring or
18 proposed within the park. Some would have a
19 positive impact to historic buildings and
20 structures. The incremental impact of Alternative
21 1 when added to other past, present, and
22 reasonably foreseeable future actions would be
23 long-term and positive.

24 Conclusion

25 Current management and maintenance of historic
26 buildings and structures, park goals of
27 preservation of the historic character of the
28 Memorial and grounds and lack of ABAAS
29 accessibility standards for the plazas and column
30 would result in no modifications to existing
31 historic buildings and structures. Therefore,
32 implementation of the No Action Alternative
33 would result in no adverse impacts to these
34 resources.

35 **ALTERNATIVE 2 (PROPOSED ACTION)**

36 Impacts

37 In the development of the action alternatives, a
38 priority was defined and articulated by park staff.
39 This priority was the desire to make park
40 entrances, circulation and major features
41 compliant with ABAAS standards for accessibility,
42 so all visitors would be able to access the park, and
43 its facilities. The park staff also had strong feelings
44 about accommodating visitors at the Memorial

45 through implementation of ABAAS standards for
46 access to the lower plaza and access from the
47 lower plaza to the upper plaza. The staff were not
48 in favor of options that brought visitors around the
49 side or rear of the upper plaza, but rather felt that
50 any accessibility changes would allow visitors to
51 experience the grandeur of the Beaux Arts design.
52 In response, the design team located a ramp
53 system on either side of the grass berm that would
54 provide access to the lower plaza and a ramp
55 system in the center of the monumental steps
56 leading from the lower to the upper plaza. This
57 approach would preserve the greatest amount of
58 the existing stair system as well as the symmetry of
59 the original design. At each end of the stairs, the
60 existing relationship between the plinths and the
61 urns would be maintained. The slope of the ramps
62 is shallow enough that railings would not be
63 required. While not required, the design team
64 provided a granite perimeter seat that would
65 create a safety barrier. Heights of landings and
66 adjacent steps or ramps would not require
67 guardrails.

68 Alternative 2 would be sensitive to the original
69 design intent for the paving materials on both
70 plazas. Recommendations would enhance the
71 sustainability of the plaza paving and materials
72 would be of the highest quality and condition and
73 the historic paving pattern would be retained. The
74 visitors eye would move quickly away from the
75 familiar historic surface pattern to the contrasting
76 simplicity of the Doric column above, and then
77 onto the views and vistas of the historic core from
78 the plaza.

79 Within this alternative and due to the goals for
80 accessibility, there would be a moderate adverse
81 effect to the Memorial steps, one of the character
82 defining features of the Memorial structure.
83 Alteration of the steps for accessibility would
84 diminish the overall integrity of this feature, but
85 would not jeopardize the historical integrity of the
86 Memorial structure and grounds to the extent that
87 it would lose its current listing in the National
88 Register. The determination of effect for Section
89 106 would be **adverse effect**.

1 Section 106 Summary

2 NHPA section 106 regulations apply only to
3 properties that meet the eligibility requirements of
4 the National Register. Therefore, the assessment
5 of NHPA section 106 effects applies only to those
6 historic structures/cultural landscape features that
7 are listed on the National Register or those that
8 meet National Register criteria for listing. The
9 application of the Advisory Council criteria of
10 adverse effects (36 CFR 800.5 “Assessment of
11 Adverse Effects”) has been completed.

12 For purposes of Section 106 compliance there
13 would be **adverse effect** on Historic Buildings and
14 Structures due to proposed actions in Alternative
15 2.

16 Mitigation

- 17 ▪ Pursuant to a Programmatic Agreement, the
18 NPS would continue to consult with the Ohio
19 SHPO Office and concurring parties to ensure
20 that the undertaking will meet the Secretary of
21 Interior’s Standards for Rehabilitating Historic
22 Structures and Cultural Landscapes.

23 Cumulative Impacts

24 There are a number of past, ongoing, and
25 reasonably foreseeable projects occurring or
26 proposed within the park. Some would have a
27 positive impact to historic buildings and
28 structures. The incremental impact of Alternative
29 2 when added to other past, present, and
30 reasonably foreseeable future actions would be
31 long-term, minor and adverse.

32 Conclusion

33 Within Alternative 2, all maintenance and
34 management of historic building and structures
35 would continue including projects for repair and
36 restoration of the column and the plazas. These
37 projects plus the paving recommendation (upper
38 plaza will be paved with granite and brick, based
39 on the original design and pattern of the
40 Freedlander plans) within this alternative would
41 have a long-term positive impact on the Memorial
42 structure. Ramp access to the lower plaza would
43 have a minor impact on the resource and for
44 Purposes of Section 106, no adverse effect.

45 Implementation of ABAAS standards for
46 accessibility from the lower plaza to the upper
47 plaza would be a moderate adverse impact on the
48 structure and for purposes of Section 106, an
49 **adverse effect**.

50 **ALTERNATIVE 3: (PROPOSED ACTION AND 51 NPS-PREFERRED)**

52 Impacts

53 In the development of the action alternatives, a
54 priority was defined and articulated by park staff.
55 This priority was the desire to make park
56 entrances, circulation and major features
57 compliant with ABAAS standards for accessibility
58 so visitors would be able to access the park, and its
59 facilities. The park staff also had strong feelings
60 about accommodating visitors at the Memorial
61 through implementation of ABAAS standards for
62 accessibility to the lower plaza and from the lower
63 plaza to the upper plaza. The staff were not in
64 favor of options that brought visitors around the
65 side or rear of the upper plaza, but rather felt that
66 any accessibility changes would allow visitors to
67 experience the grandeur of the Beaux Arts design.
68 In response, the design team located a ramp
69 system on either side of the grass berm that would
70 provide access to the lower plaza and a ramp
71 system in the center of the monumental steps
72 leading from the lower to the upper plaza. This
73 approach would preserve the greatest amount of
74 the existing stair system as well as the symmetry of
75 the original design. At each end of the stairs, the
76 existing relationship between the plinths and the
77 urns would be maintained. The slope of the ramps
78 is shallow enough that railings would not be
79 required. While not required, the design team
80 provided a granite perimeter seat that would
81 create a safety barrier. Heights of landings and
82 adjacent steps or ramps would not require
83 guardrails.

84 Alternative 3 would be sensitive to the original
85 design intent for the paving materials on both
86 plazas. Recommendations would enhance the
87 sustainability of the plaza paving and materials
88 would be of the highest quality and condition and
89 the historic paving pattern would be retained. The
90 visitors eye would move quickly away from the
91 familiar historic surface pattern to the contrasting

1 simplicity of the Doric column above, and then
2 onto the views and vistas of the historic core from
3 the plaza.

4 Within this alternative and due to the goals for
5 accessibility, there would be a moderate adverse
6 effect to the Memorial steps, one of the character
7 defining features of the Memorial structure.
8 Alteration of the steps for accessibility would
9 diminish the overall integrity of this feature but
10 would not jeopardize the historical integrity of the
11 Memorial structure and grounds to the extent that
12 it would lose its current listing in the National
13 Register. The determination of effect for Section
14 106 would be **adverse effect**.

15 Section 106 Summary

16 NHPA section 106 regulations apply only to
17 properties that meet the eligibility requirements of
18 the National Register. Therefore, the assessment
19 of NHPA section 106 effects applies only to those
20 historic structures/cultural landscape features that
21 are listed on the National Register or those that
22 meet National Register criteria for listing. The
23 application of the Advisory Council criteria of
24 adverse effects (36 CFR 800.5 “Assessment of
25 Adverse Effects”) has been completed.

26 For purposes of Section 106 compliance there
27 would be **adverse effect** on Historic Buildings and
28 Structures due to proposed actions in Alternative
29 3.

30 Mitigation

- 31 ■ Pursuant to a Programmatic Agreement, the
32 NPS would continue to consult with the Ohio
33 SHPO Office and concurring parties to ensure
34 that the undertaking will meet the Secretary of
35 Interior’s Standards for Rehabilitating Historic
36 Structures and Cultural Landscapes.

37 Cumulative Impacts

38 There are a number of past, ongoing, and
39 reasonably foreseeable projects occurring or
40 proposed within the park. Some would have a
41 positive impact to historic buildings and
42 structures. The incremental impact of Alternative
43 3 when added to other past, present, and

44 reasonably foreseeable future actions would be
45 long-term, minor, and adverse.

46 Conclusion

47 Within Alternative 3, all maintenance and
48 management of historic building and structures
49 would continue as well as projects for repair and
50 restoration of the column and the plazas. These
51 projects plus the paving recommendation (upper
52 plaza will be paved with granite and brick, based
53 on the original design and pattern of the
54 Freedlander plans) within this alternative would
55 have a long-term positive impact on the Memorial
56 structure. Ramp access to the lower plaza would
57 have a minor impact on the resource and for
58 purposes of Section 106, no adverse effect.
59 Changes to the steps, a character defining feature
60 of the Memorial, to implement ABAAS standards
61 for accessibility from the lower plaza to the upper
62 plaza, would be a moderate adverse impact on the
63 structure and for purposes of Section 106, an
64 **adverse effect**.

65 **Cultural Landscape**

66 **ALTERNATIVE 1 (NO ACTION)**

67 Impacts

68 Current management and maintenance within this
69 alternative focus on preservation of the designed
70 historic landscape of Perry’s Victory and
71 International Peace Memorial. The landscape
72 around the Memorial was carefully considered to
73 provide an appropriate setting for the monument
74 itself. As noted in the National Register
75 Nomination Additional Documentation for the
76 Memorial, Freedlander and Seymour considered
77 views both to and from the monument, utilizing
78 Beaux Arts planning features such as axial avenues
79 and planned vistas. As noted in the National
80 Register Additional Documentation:

81 The openness of the site, achieved through the
82 establishment of lawn areas on the east and
83 west sides of the plazas that reflect the open
84 expanses of water on the north and south sides,
85 provides the symmetrical balance that is one of
86 the hallmarks of Beaux Arts Classicism. . . .

87 The most prominent vegetative feature of the
88 site, however, is the flat, grassed lawn, a

1 mixture of grasses, clove, and weeds. . . The
 2 architects specified a mixture of several types
 3 of grasses and white clover in the earliest
 4 landscape design, but it is unknown whether
 5 that was ultimately the mix planted or if any of
 6 the original grasses remain. Nevertheless, the
 7 wide, flat, horizontal expanse of grass as a
 8 visual counter to the verticality of the
 9 Memorial column was integral to the original
 10 design concept. . . In addition, the planter beds
 11 located on the upper plaza were specified as
 12 beds of grass, called grass panels in the original
 13 design. As grass panels, they would carry the
 14 overall effect of the horizontal plane of the
 15 lawn onto the plaza. Although planted in
 16 barberry hedging between 1925 and 1933, they
 17 have been planted in grass, per the original
 18 design, since the removal of the barberry
 19 hedges beginning in the mid-1930s.²⁴

20 In 1924, Freedlander redesigned some of the
 21 landscape plantings in response to a shortfall in
 22 funding for the designed landscape. The revised
 23 design includes plantings of trees and shrubs along
 24 the east and west boundaries of the original site,
 25 framing the plazas and lawns.²⁵

26 Exploration of ways to utilize the cultural
 27 landscape as a tool for interpreting the historical
 28 context of the battle and the updated
 29 understanding of some battle events and troop
 30 movements would not be part of continuing
 31 management within this alternative. Visitors
 32 would continue to gain most of their knowledge of
 33 the Battle of Lake Erie through the exhibits
 34 located within the visitor center and on the
 35 observation platform of the Memorial column,
 36 which is not ABAAS accessible. This alternative
 37 would limit the park in its ability to explain the
 38 historical context of the battle through visual
 39 association and interpretation of the cultural
 40 landscape. The park would manage and maintain
 41 the open turf landscape, the grass panels on the
 42 upper plaza, and existing tree plantings on the east
 43 and west boundaries of the historic core. There

44 would be no direct adverse impact to the cultural
 45 landscape within this alternative, but there would
 46 be limitations to its use in expanded
 47 interpretation.

48 Section 106 Summary

49 NHPA section 106 regulations apply only to
 50 properties that meet the eligibility requirements of
 51 the National Register. Therefore, the assessment
 52 of NHPA section 106 effects applies only to those
 53 historic structures/cultural landscape features that
 54 are listed on the National Register or those that
 55 meet National Register criteria for listing. The
 56 application of the Advisory Council criteria of
 57 adverse effects (36 CFR 800.5 “Assessment of
 58 Adverse Effects”) has been completed.

59 For purposes of Section 106 compliance there
 60 would be **no adverse effect** on the cultural
 61 landscape.

62 Cumulative Impacts

63 There are a number of past, ongoing, and
 64 reasonably foreseeable projects occurring or
 65 proposed within the park. Some would have a
 66 positive impact to the cultural landscape. The
 67 incremental impact of the no action alternative
 68 when added to other past, present, and reasonably
 69 foreseeable future actions would be negligible.

70 Conclusion

71 Current management and maintenance of the
 72 cultural landscape and park goals of preservation
 73 of historical character of the historic designed
 74 landscape would result in no modifications to the
 75 existing cultural landscape. Therefore,
 76 implementation of the No Action alternative
 77 would not result in any changes to the overall
 78 integrity or on the character-defining features of
 79 the cultural landscape as they currently exist.
 80 Therefore, there would be would no adverse

24 Ibid, 7-10, 7-11.

25 Deborah E. Harvey, MHP, Outside the Box, LLC,
 Richmond, Virginia, *National Register Nomination for
 Perry's Victory and International Peace Memorial
 (Additional Documentation)*, September 8, 2014, 7-11,7-
 12.

1 impacts and **no adverse effects** to the cultural
2 landscape.

3 **ALTERNATIVE 2 (PROPOSED ACTION)**

4 Impacts

5 Alternative 2 would retain and enhance the
6 landscape elements and features that are
7 contributing resources to the landscape. Also, the
8 historically important views of the cultural
9 landscape would be maintained and enhanced. In
10 addition, the flagpoles would be retained and the
11 grading of the topography would continue the
12 symmetry around the Memorial while retaining
13 the open space setting of the historic designed
14 landscape. Alternative 2 would add expanded
15 walkways within the historic core of the park. The
16 curvilinear alignments are graceful and sensitive to
17 the simplicity of the Memorial grounds. Although
18 a proposed change to the landscape, the change
19 would preserve the openness and restore some of
20 the original design intent to the grounds.
21 Alternative 2 would situate the Memorial firmly in
22 its landscape, drawing together the Doric column,
23 the berm and the open lawn areas into to total
24 composition. Overall, Alternative 2 would respect
25 and enhance the landscape and setting of the
26 Memorial and grounds and afford visitors
27 opportunities for expanded interpretation through
28 integration with the cultural landscape. There
29 would be a long-term positive impact on the
30 cultural landscape.

31 Section 106 Summary

32 NHPA section 106 regulations apply only to
33 properties that meet the eligibility requirements of
34 the National Register. Therefore, the assessment
35 of NHPA section 106 effects applies only to those
36 historic structures/cultural landscape features that
37 are listed on the National Register or those that
38 meet National Register criteria for listing. The
39 application of the Advisory Council criteria of
40 adverse effects (36 CFR 800.5 “Assessment of
41 Adverse Effects”) has been completed.

42 For purposes of Section 106 compliance there
43 would be **no adverse effect** on cultural
44 landscapes.

45 Cumulative Impacts

46 There are a number of past, ongoing, and
47 reasonably foreseeable projects occurring or
48 proposed within the park. Some would have a
49 positive impact to the cultural landscape. The
50 incremental impact of Alternative 2 when added to
51 other past, present, and reasonably foreseeable
52 future actions would be long-term and positive.

53 Conclusion

54 With implementation of the proposed actions in
55 Alternative 2 and maintenance of the integrity of
56 the cultural landscape while integrating it with the
57 overall visitor experience, there would be a long-
58 term and positive impact on the cultural landscape
59 of Perry’s Victory and International Peace
60 Memorial.

61 **ALTERNATIVE 3: (PROPOSED ACTION AND** 62 **NPS-PREFERRED)**

63 Impacts

64 Alternative 3 would retain and enhance the
65 landscape elements and features that are
66 contributing resources to the landscape. Also, the
67 historically important views of the cultural
68 landscape would be maintained and enhanced. In
69 addition, the flagpoles would be retained and the
70 grading of the topography would retain the
71 symmetry around the Memorial while retaining
72 the open space setting of the historic designed
73 landscape. Alternative 3 would retain many of the
74 existing walkways and also add walkways within
75 the historic core of the park. The additional
76 walkways that parallel the Memorial would
77 provide additional access to the south boundary of
78 the park and views and access to the south façade
79 of the Memorial. The walkway alignments would
80 be rectilinear and retain more of the existing
81 walkways within the historic core. The circulation
82 design would retain the open symmetrical lawn
83 areas to the east and west of the Memorial. This
84 alternative would incorporate additional tree
85 plantings located east and west of the historic core
86 that help re-establish enclosure of the historic core
87 space. Alternative 3 would change the landscape,
88 but the actions would preserve the openness and
89 restore some of the original design intent to the
90 grounds. Alternative 3 would situate the Memorial

1 firmly in its landscape, drawing together the Doric
2 column, the berm and the open lawn areas into a
3 total composition. Overall, Alternative 3 would
4 respect and enhance the landscape and setting of
5 the Memorial and grounds and afford visitors
6 opportunities for expanded interpretation through
7 integration with the cultural landscape.

8 Section 106 Summary

9 NHPA section 106 regulations apply only to
10 properties that meet the eligibility requirements of
11 the National Register. Therefore, the assessment
12 of NHPA section 106 effects applies only to those
13 historic structures/cultural landscape features that
14 are listed on the National Register or those that
15 meet National Register criteria for listing. The
16 application of the Advisory Council criteria of
17 adverse effects (36 CFR 800.5 “Assessment of
18 Adverse Effects”) has been completed.

19 For purposes of Section 106 compliance there
20 would be **no adverse effect** on cultural
21 landscapes.

22 Cumulative Impacts

23 There are a number of past, ongoing, and
24 reasonably foreseeable projects occurring or
25 proposed within the park. Some would have a
26 positive impact to the cultural landscape. The
27 incremental impact of Alternative 3 when added to
28 other past, present, and reasonably foreseeable
29 future actions would be long-term and positive.

30 Conclusion

31 With implementation of the proposed actions in
32 Alternative 3 and maintenance of the integrity of
33 the cultural landscape, there would be a long-term
34 and positive impact on the cultural landscape of
35 Perry’s Victory and International Peace Memorial.

36 **Historic Viewsheds**

37 **ALTERNATIVE 1 (NO ACTION)**

38 Impacts

39 The historic viewsheds associated with the
40 Memorial and grounds would be maintained in
41 their current conditions within this alternative.
42 Powerlines would remain in the viewshed along
43 Bayview Avenue from Hartford to Toledo

44 Avenues and create visual clutter in the major
45 viewshed to the Memorial and the park
46 identification sign. A variety of traffic signs and
47 signals would continue to contribute to the clutter
48 in this viewshed to the Memorial. The viewshed
49 from the park entrance at Delaware and Toledo
50 Avenues would need consistent vegetation
51 management and maintenance in order to retain
52 the viewshed to the Memorial. The viewshed from
53 the historic designed landscape to the Memorial
54 column would be maintained and managed.
55 Historic viewsheds from the water toward the
56 Memorial would remain relatively uncluttered but
57 the park does not have jurisdiction over dock
58 construction in Put-in-Bay and that development
59 would continue to disrupt the viewshed from Lake
60 Erie to the Memorial. The viewshed from the
61 observation platform of the Memorial column to
62 the site of the Battle of Lake Erie, would survive
63 with no visual interference. Implementation of this
64 alternative would result in long-term minor
65 adverse impacts to historic viewsheds.

66 Section 106 Summary

67 NHPA section 106 regulations apply only to
68 properties that meet the eligibility requirements of
69 the National Register. Therefore, the assessment
70 of NHPA section 106 effects applies only to those
71 historic structures/cultural landscape features that
72 are listed on the National Register or those that
73 meet National Register criteria for listing. The
74 application of the Advisory Council criteria of
75 adverse effects (36 CFR 800.5 “Assessment of
76 Adverse Effects”) has been completed.

77 For purposes of Section 106 compliance there
78 would be **no adverse effect** on Historic
79 Viewsheds.

80 Cumulative Impacts

81 There are a number of past, ongoing, and
82 reasonably foreseeable projects occurring or
83 proposed within the park. None would have an
84 impact on historic viewsheds. The incremental
85 impact of the no action alternative when added to
86 other past, present, and reasonably foreseeable
87 future actions would be negligible.

1 Conclusion

2 Historic viewsheds associated with the Memorial
3 column and grounds are managed and maintained
4 within this alternative. Current management and
5 maintenance of the viewsheds and park goals for
6 preservation of the historic character of the park
7 would result in no modification to the existing
8 historic viewsheds. Therefore, implementation of
9 the No Action alternative would result in no
10 adverse impact on historic viewsheds.

11 **ALTERNATIVE 2 (PROPOSED ACTION)**

12 Impacts

13 In the original design for the Memorial,
14 Freedlander and Seymour considered views both
15 to and from the monument, utilizing Beaux Arts
16 planning features such as axial avenues and
17 planned vistas. Specific actions resulting from the
18 implementation of this alternative and associated
19 with potential impacts on these historic viewsheds
20 would include: underground powerlines along
21 Bayview Avenue from Hartford to Toledo
22 Avenues, additional tree plantings strategically
23 located to enhance views to the Memorial; and
24 maintenance of open space around the Memorial
25 and plazas. These actions would have a long-term
26 positive impact on historic viewsheds within the
27 park and from the park.

28 Construction activities associated with expansion
29 of circulation and addition of small buildings
30 would have a short-term minor adverse impact on
31 historic viewsheds when large equipment and
32 associated construction fences or storage
33 obstructs the viewsheds. These impacts would be
34 short-term (the duration of the project) and the
35 viewshed re-established once construction was
36 complete.

37 Overall there would be a long-term positive impact
38 on historic viewsheds with the implementation of
39 Alternative 2.

40 Section 106 Summary

41 NHPA section 106 regulations apply only to
42 properties that meet the eligibility requirements of
43 the National Register. Therefore, the assessment
44 of NHPA section 106 effects applies only to those

45 cultural landscape features including historic
46 viewsheds that are listed on the National Register
47 or those that meet National Register criteria for
48 listing. The application of the Advisory Council
49 criteria of adverse effects (36 CFR 800.5
50 “Assessment of Adverse Effects”) has been
51 completed. For purposes of Section 106
52 compliance there would be **no adverse effect** on
53 Historic Viewsheds.

54 Cumulative Impacts

55 There are a number of past, ongoing, and
56 reasonably foreseeable projects occurring or
57 proposed within the park. None of which would
58 have an impact on historic viewsheds. The
59 incremental impact of the Alternative 2 when
60 added to other past, present, and reasonably
61 foreseeable future actions would be long-term and
62 positive due to the re-establishment of critical
63 viewsheds and subsequent management and
64 maintenance.

65 Conclusion

66 Under Alternative 2, viewsheds associated with the
67 Memorial and landscape conditions would be re-
68 established, maintained and managed and offer
69 park visitors an understanding of the historic
70 landscape, the Memorial column and plazas, and
71 the Battle of Lake Erie from the observation
72 platform at the top of the Memorial column.
73 Overall, the impact of Alternative 2 on historic
74 viewsheds would be long-term and positive.

75 **ALTERNATIVE 3: (PROPOSED ACTION AND
76 NPS-PREFERRED)**

77 Impacts

78 In the original design for the Memorial,
79 Freedlander and Seymour considered views to and
80 from the monument, utilizing Beaux Arts planning
81 features such as axial avenues and planned vistas.
82 Specific actions resulting from the implementation
83 of this alternative and associated with potential
84 impacts on historic viewsheds would include:
85 underground powerlines along Bayview Avenue
86 from Hartford to Toledo Avenues; additional tree
87 plantings strategically located to enhance views to
88 the Memorial; and maintenance of open space
89 around the Memorial and plazas. These actions

1 would have a long-term positive impact on historic
2 viewsheds within the park and from the park.

3 Construction activities associated with expansion
4 of circulation and addition of small buildings
5 could have a short-term minor adverse impact on
6 historic viewsheds when large equipment and
7 associated construction fences or storage
8 obstructs the viewsheds, especially internal park
9 views to and from the Memorial. These impacts
10 would be short-term (the duration of the project)
11 and the viewshed re-established once construction
12 is complete.

13 Overall there would be a long-term positive impact
14 on historic viewsheds with the implementation of
15 Alternative 3.

16 Section 106 Summary

17 NHPA section 106 regulations apply only to
18 properties that meet the eligibility requirements of
19 the National Register. Therefore, the assessment
20 of NHPA section 106 effects applies only to those
21 cultural landscape features including historic
22 viewsheds that are listed on the National Register
23 or those that meet National Register criteria for
24 listing. The application of the Advisory Council
25 criteria of adverse effects (36 CFR 800.5
26 “Assessment of Adverse Effects”) has been
27 completed. For purposes of Section 106
28 compliance there would be **no adverse effect** on
29 Historic Viewsheds.

30 Cumulative Impacts

31 There are a number of past, ongoing, and
32 reasonably foreseeable projects occurring or
33 proposed within the park. None would have an
34 impact on historic viewsheds. The incremental
35 impact of the Alternative 3 when added to other
36 past, present, and reasonably foreseeable future
37 actions would be long-term and positive due to the
38 re-establishment of critical viewsheds and
39 subsequent management and maintenance.

40 Conclusion

41 Under Alternative 3, viewsheds associated with the
42 Memorial and landscape conditions would be re-
43 established, maintained and managed and offer
44 park visitors an understanding of the historic

45 landscape, the Memorial column and plazas, and
46 the Battle of Lake Erie from the observation
47 platform at the top of the Memorial column.
48 Overall, the impact of Alternative 2 on historic
49 viewsheds would be long-term and positive.

50 **Visitor Use and Experience**

51 **ALTERNATIVE 1 (NO ACTION)**

52 Impacts

53 Within Alternative 1, there would be no additions
54 to visitor facilities and the initial visitor experience
55 would begin at the visitor center. There would be
56 no distinct entrance or transition from the Village
57 and surrounding community to the park.
58 Programs and interpretation guided by the Long
59 Range Interpretive Plan would continue. Visitors
60 would continue to access the park at the
61 intersection of Delaware and Toledo Avenues and
62 at the intersection of Bayview and Toledo
63 Avenues. The park would continue to manage and
64 maintain the pedestrian circulation system in its
65 current alignment throughout the park. Within
66 this alternative would be no new visitor amenities
67 and no expansion of interpretation using the
68 cultural landscape as a tool for interpreting the
69 significance of the site. The No Action Alternative
70 would continue to have moderate adverse impacts
71 on the visitor experience due to major limitations
72 of ABA-ADA access to the visitor center east porch
73 and entrance as well as no accessibility to the
74 Memorial plazas for visitors with disabilities.
75 There would continue to be no clear access and
76 orientation afforded to visitors as they approach
77 the park from the Village and surrounding
78 roadways. Therefore, Alternative 1 would have
79 long-term moderate adverse impact on the visitor
80 experience. Visitor frustration has been expressed
81 to park staff concerning the visitor experience and
82 lack of accessibility.

83 Cumulative Impacts

84 There are a number of past, ongoing, and
85 reasonably foreseeable projects occurring or
86 proposed within the park, which would have
87 short-term positive impacts to the visitor
88 experience. These projects would be for the most
89 part associated with maintenance and
90 management. The incremental impact of the no

1 action alternative when added to other past,
2 present, and reasonably foreseeable future actions
3 would be long-term and adverse as the overall
4 visitor experience would remain the same, with
5 limited interpretation and full accessibility for all
6 park visitors.

7 Conclusion

8 This alternative would have long-term moderate
9 adverse impacts on the visitor experience due to
10 the limitations of existing interpretation and
11 integrated with the cultural landscape. Even more
12 significant is the lack of universal accessibility
13 including programmatic accessibility to park
14 visitors with disabilities.

15 **ALTERNATIVE 2 (PROPOSED ACTION)**

16 Impacts

17 Specific actions resulting from the implementation
18 of this alternative and associated with potential
19 impacts on visitor use and experience would
20 include: expanded pedestrian circulation system
21 with curvilinear walkways; creation of spaces in
22 the landscape for passive recreation and
23 contemplation; expanded circulation system that
24 would meet ABAAS standards for accessibility
25 throughout the park landscape, the Memorial
26 plazas, the visitor center and all proposed park
27 buildings; addition of distinct and formal
28 entrances to the park, including the new route
29 through the Peace Garden from Hartford Avenue
30 and the other entrances from Toledo Avenue;
31 addition of contemplative nodes along the
32 walkway to afford visitors shade, seating, wayside
33 interpretation and viewsheds; and, addition of
34 open-air pavilion structures east of the visitor
35 center for group gatherings, special events
36 associated with interpretation, shade, and
37 protection from the elements. The visitor center
38 would also offer programmatic accessibility for
39 disabled visitors. The proposed actions in
40 Alternative 2 would have a long-term positive
41 impact to visitor use and experience at Perry's
42 Victory and International Peace Memorial.

43 Cumulative Impacts

44 There are a number of past, ongoing, and
45 reasonably foreseeable projects occurring or

46 proposed within the park, which would have
47 short-term positive impacts, associated with
48 maintenance and management, to the visitor
49 experience at Perry's Victory and International
50 Peace Memorial. The incremental impact of
51 Alternative 2 when added to other past, present,
52 and reasonably foreseeable future actions would
53 be long-term and positive for visitor use and
54 experience at the park.

55 Conclusion

56 The proposed walkways would be expanded and
57 modified in accordance with the site grading and
58 landscape. The system of curvilinear walkways and
59 associated nodes would guide pedestrian
60 movement across the visitor access
61 /administration zone and the historic core zone of
62 the park. In addition, walkways would improve
63 accessibility throughout the park thereby creating
64 a positive impact for access by visitor with
65 disabilities. The proposed actions in Alternative 2
66 would have a long-term positive impact to visitor
67 use and experience at Perry's Victory and
68 International Peace Memorial.

69 **ALTERNATIVE 3: (PROPOSED ACTION AND 70 NPS-PREFERRED)**

71 Impacts

72 Specific actions resulting from the implementation
73 of this alternative and associated with potential
74 impacts on visitor use and experience would
75 include: expanded pedestrian circulation system
76 with walkways and major nodes; expanded
77 circulation system that would meet ABAAS
78 accessibility standards throughout the park
79 landscape, the Memorial plazas, the visitor center
80 and all proposed park buildings; addition of
81 distinct and formal entrances to the park that
82 would include the new route through the Peace
83 Garden from Hartford Avenue and the other
84 entrances from Toledo Avenue; addition of three
85 contemplative nodes, two at the south terminus of
86 the diagonal walkways and one associated with the
87 northwest corner of the park afford visitors shade,
88 seating, wayside interpretation and viewsheds to
89 the landscape; and, addition of open-air pavilion
90 structures flanking the east façade of the visitor
91 center for expanded park programs and special

1 events. The visitor center would also offer
 2 programmatic accessibility for disabled visitors.
 3 The proposed actions in Alternative 3 would have
 4 a long-term positive impact to visitor use and
 5 experience at Perry's Victory and International
 6 Peace Memorial.

7 Cumulative Impacts

8 There are a number of past, ongoing, and
 9 reasonably foreseeable projects occurring or
 10 proposed within the park, which would have
 11 short-term positive impacts, associated with
 12 maintenance and management, to the visitor
 13 experience at Perry's Victory and International
 14 Peace Memorial. The incremental impact of
 15 Alternative 3 when added to other past, present,
 16 and reasonably foreseeable future actions would
 17 be long-term and positive for visitor use and
 18 experience at the park.

19 Conclusion

20 The proposed walkways would be expanded and
 21 modified in accordance with the site grading and
 22 landscape. The system of walkways and associated
 23 nodes would guide pedestrian movement across
 24 the visitor access /administration zone and the
 25 historic core zone of the park. In addition,
 26 walkways would improve accessibility throughout
 27 the park thereby creating a positive impact for
 28 access by visitor with disabilities. The proposed
 29 actions in Alternative 3 would have a long-term
 30 positive impact to visitor use and experience at
 31 Perry's Victory and International Peace Memorial.

32 **Human Health and Safety**

33 **ALTERNATIVE 1 (NO ACTION)**

34 Impacts

35 The No Action Alternative would represent a
 36 continuation of the existing conditions,
 37 operations, and maintenance of Perry's Victory
 38 and International Peace Memorial. Park staff
 39 would continue to implement plans and policies to
 40 promote safety for all visitors to the park. Park
 41 personnel would remain vigilant with visitor safety
 42 issues dealing with severe summer weather, heat
 43 and humidity, insects, storms, and flooding.
 44 Current and ongoing management and

45 maintenance of buildings, structures, walkways,
 46 exhibits, site furnishings, and vegetation would
 47 continue. There would also be continued
 48 monitoring and maintenance of the park's signage
 49 that clarifies separation of vehicular and
 50 pedestrian circulation, and limited access to the
 51 Memorial upper plaza. Park staff would supervise
 52 visitation at the Memorial column and plazas in
 53 order to keep visitors from climbing the berm
 54 around the lower plaza. Park staff would also
 55 monitor golf cart use of pedestrian walkways.
 56 Pathway lighting would remain in the vicinity of
 57 the visitor center.

58 The black powder magazine would remain in a
 59 location that does not meet compliance standards
 60 for this type of facility. This would result in a
 61 potential safety hazard in the proximity of staff
 62 housing and the adjacent neighborhood east of the
 63 park.

64 There would be a long-term (a year or longer to
 65 implement a PMIS project or projects) localized
 66 adverse impact to this specific area within the
 67 park. The impact would be significant due to
 68 potential threats to the safety and well- being of
 69 park staff, visitors and neighbors. Therefore, there
 70 would be a long-term moderate adverse impact on
 71 human health and safety.

72 Cumulative Impacts

73 There are a number of past, ongoing, and
 74 reasonably foreseeable projects occurring or
 75 proposed within the park, which would have
 76 short-term positive impacts associated with
 77 maintenance and management for human health
 78 and safety at Perry's Victory and International
 79 Peace Memorial. The incremental impact of the no
 80 action alternative when added to other past,
 81 present, and reasonably foreseeable future actions
 82 would add a long-term and adverse impact due to
 83 the continued issue of visitor safety associated
 84 with the location of the black powder magazine.

85 Conclusion

86 Within this alternative, there would be significant
 87 (immediate and unaddressed threats to human
 88 safety) adverse impacts on human health and
 89 safety.

1 **ALTERNATIVE 2 (PROPOSED ACTION)**

2 Impacts

3 Specific actions from the implementation of
4 alternative 2 associated with potential impacts on
5 human health and safety would include: relocation
6 of the black powder magazine south of staff
7 housing and within the required 75' buffer; ABAAS
8 accessibility to all park circulation and facilities;
9 new and sustainable paving on the upper plaza;
10 removal of parking from the north side of the
11 Memorial and clear directional signage and
12 circulation from village streets into and through
13 the park. There would be consideration and
14 planning for necessary lighting along pathways
15 and use of solar energy in the implementation of
16 any new lighting plans. These actions would have a
17 long-term positive impact on human health and
18 safety within the park.

19 Cumulative Impacts

20 There are a number of past, ongoing, and
21 reasonably foreseeable projects occurring or
22 proposed within the park which would have short-
23 term positive impacts on human health and safety.
24 The incremental impact of Alternative 2 when
25 added to other past, present, and reasonably
26 foreseeable future actions would be long-term and
27 positive due to the implementation of the specified
28 improvements in Alternative 2.

29 Conclusion

30 Within this alternative, there would be long-term
31 and positive impacts on human health and safety.
32 The number and extent of the specified actions
33 would ensure for many years into the future, the
34 well-being of park staff, visitors and neighbors.

35 **ALTERNATIVE 3: (PROPOSED ACTION AND
36 NPS-PREFERRED)**

37 Impacts

38 Specific actions from the implementation of
39 Alternative 3 associated with potential impacts on
40 human health and safety would include: relocation
41 of the black powder magazine south of staff
42 housing and within the required 75' buffer; ABAAS
43 accessibility to all park circulation and facilities;
44 new and sustainable paving on the upper plaza;

45 removal of parking from the north side of the
46 Memorial; and clear directional signage and
47 circulation from village streets into and through
48 the park. There would be consideration and
49 planning for necessary lighting along pathways
50 and use of solar energy in the implementation of
51 new lighting plans. These actions would have a
52 long-term positive impact on human health and
53 safety within the park.

54 Cumulative Impacts

55 There are a number of past, ongoing, and
56 reasonably foreseeable projects occurring or
57 proposed within the park which would have short-
58 term positive impacts on human health and safety.
59 The incremental impact of Alternative 3 when
60 added to other past, present, and reasonably
61 foreseeable future actions would be long-term and
62 positive due to the implementation of the specified
63 improvements.

64 Conclusion

65 Within Alternative 3, there would be long-term
66 and positive impacts on human health and safety.
67 The number and extent of the specified actions
68 would ensure for many years into the future, the
69 well-being of park staff, visitors and neighbors.

70 **Consultation and Coordination**

71 National Park Service (NPS) Director's Order 12
72 requires the NPS to make "diligent" efforts to
73 involve the interested and affected public in the
74 National Environmental Policy Act (NEPA)
75 process. This chapter documents the scoping
76 process for this Environmental Assessment (EA) as
77 well as interagency consultation and coordination
78 with the U. S. Fish and Wildlife Service (USFWS),
79 Ohio State Historic Preservation Office (SHPO)
80 and other natural and cultural resource agencies.
81 Included in this chapter is the list of recipients
82 who received notice of the project undertaking
83 and the planned stakeholder meetings.

84 **Scoping Process and Public
85 Involvement**

86 **Start-Up Meeting:** To officially initiate this
87 project, a kick-off meeting was held on November

1 14 and 15, 2016. Project team members from
 2 Commonwealth Heritage Group (CHG) and
 3 Weiss, Janney, Elstner (WJE) met with park and
 4 regional NPS personnel at Perry's Victory and
 5 International Peace Memorial to initiate work on
 6 the Comparative Analysis and development of the
 7 Cultural Landscape Treatment Plan Alternatives
 8 and the Environmental Assessment (EA). This
 9 internal scoping meeting included the following
 10 participants:

- 11 ▪ Bill Harlow, *Chief, Historic Architecture and*
 12 *Landscapes, NPS Midwest Regional Office*
- 13 ▪ Marla McEnaney, *Historical Landscape*
 14 *Architect, NPS Midwest Regional Office*
- 15 ▪ Barbara Fearon, *Superintendent, PEVI*
- 16 ▪ Rodney Karr, *Maintenance Supervisor, PEVI*
- 17 ▪ Jeff Helmer, *Park Ranger, PEVI*
- 18 ▪ Rob Whitman, *Park Ranger, PEVI*
- 19 ▪ Laura Knott, Project Manager, (CHG)
- 20 ▪ Jane Jacobs, Historical Landscape Architect,
 21 (CHG)
- 22 ▪ Deborah Slaton, Landscape Historian (WJE)
- 23 ▪ Timothy Penich, Historical Architect (WJE)

24 The meeting focused on development of the
 25 Comparative Analysis and the Cultural Landscape
 26 Treatment Plan (CLTP) and associated
 27 Environmental Analysis (EA). Stakeholder groups
 28 were identified in the meeting. All identified
 29 stakeholders received letters of invitation to the
 30 public open house scheduled held on October 25,
 31 2017.

32 A public meeting was held on October 6, 2016, in
 33 order to introduce the project to residents of
 34 South Bass Island, park staff, and interested
 35 stakeholders. The project was presented by the
 36 Superintendent and the planning team was
 37 introduced. Goals and objectives of the project
 38 were discussed and participants expressed various

39 concerns, specifically about the effects on natural
 40 resources and wildlife and on the condition of the
 41 Village beach located south of the park and
 42 adjacent to the south seawall.

43 An internal planning workshop with Park staff and
 44 the planning team was held on May 16 -17, 2017,
 45 to review progress on the CLTP/EA and to review
 46 and comment on development of alternative
 47 design concept plans (Figure 4-27). This workshop
 48 led to development of more specific goals and
 49 objectives for the project. A second public open
 50 house was held on May 17, 2017 after the
 51 workshop in order to present conceptual
 52 alternatives to the public and gain feedback
 53 (Figure 4-28).

54 The public had an additional avenue of
 55 participation through a public open house on
 56 October 25, 2017. This meeting gave stakeholders
 57 and staff an opportunity to see developed concept
 58 design alternatives. Comments and suggestions
 59 were incorporated into the draft CLTP/EA based
 60 on public input. The next submission of the
 61 document will be for public review on the NPS
 62 Planning, Environment, and Public Comment
 63 (PECP) system website. After a 30-day review, all
 64 comments will be analyzed and any revisions
 65 deemed necessary will be made and incorporated
 66 into the final document.



Figure 4-27: Public meeting in May 2017 gave stakeholders a chance to give input based on presentation of conceptual alternatives.

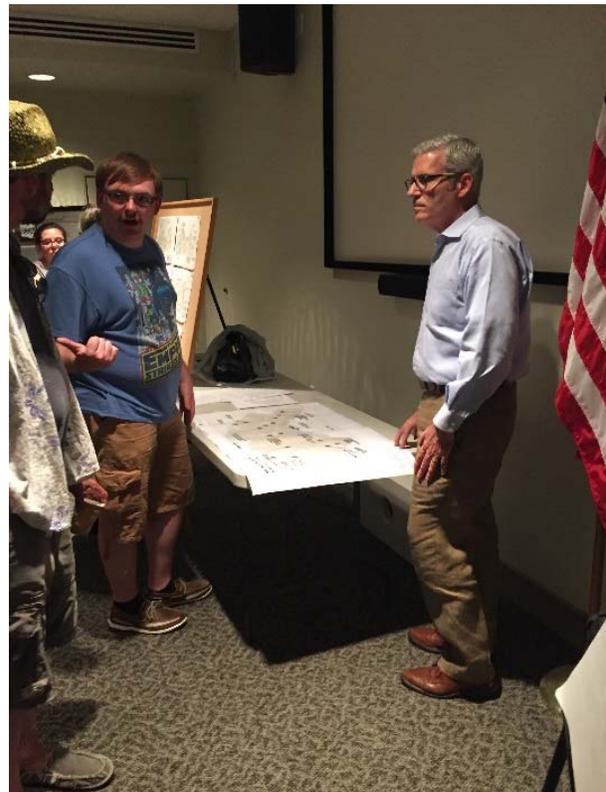


Figure 4-28: Conceptual ideas were presented to the public and issues discussed with individual team members.

1 Consultation

2 Informal consultation with USFWS and the Ohio
3 SHPO office was initiated in January of 2017. The
4 National Park Service contacted Dan Everson,
5 field Office Supervisor of the Ohio Field Office of
6 U.S. Fish and Wildlife Service, Field Supervisor
7 with the U. S. Fish and Wildlife Service (USFWS)
8 through a letter dated January 13, 2017. The letter
9 served as notification that the park had begun the
10 NEPA process and was proposing to have an EA
11 available for public and regulatory review later in
12 the year. In addition, the letter served as a record
13 that the NPS was initiating informal consultation
14 with USFWS pursuant to Section 7 of the
15 Endangered Species Act of 1973, that requires that
16 a federal agency consult with the USFWS or the
17 National Marine Fisheries Service on any action
18 that may affect endangered or threaten species or
19 candidate species or that may result in adverse
20 modification of critical habitat. The National Park
21 Service received a letter with comments and
22 recommendations that will assist the park in
23 fulfilling the requirements for consultation under

24 section 7 of the Endangered Species Act of 1973,
25 amended.

26 The National Historic Preservation Act (NHPA);
27 National Environmental Protection Act (NEPA);
28 NPS Organic Act; NPS Management Policies,
29 2006; Director's Order 12: Conservation Planning,
30 Environmental Impact Analysis and Decision-
31 making; and Director's Order 28: Cultural
32 Resources Management Standard require the
33 consideration of impacts on cultural resources,
34 either listed in or eligible to be listed in, the
35 National Register of Historic Places. The National
36 Park Service notified Amanda Schraner Terrell,
37 Deputy State Historic Preservation Officer for
38 Ohio, through a letter dated January 12, 2017. In
39 accordance with Section 800.8(3)(c) of the
40 Advisory Council on Historic Preservation's
41 regulations, this letter informed the office of the
42 SHPO of the park's intention to use the EA to meet
43 its obligations under Section 106 of the NHPA. It
44 also stated that the EA will contain an Assessment
45 of Effect for all cultural resources potentially
46 affected by the proposed alternatives. The draft

1 CLTP/EA document was made available to the
2 SHPO for review and comment.

3 **Preparers, Consultants and** 4 **References**

5 **Preparers and Consultants**

6 NPS: Perry's Victory and International Peace
7 Monument

8 Barbara Fearon, *Superintendent*

9 Rodney Karr, *Maintenance Supervisor*

10 Jeff Helmer, *Park Ranger*

11 Rob Whitman, *Park Ranger*

12 NPS: Midwest Regional Office

13 Bill Harlow, *Chief, Historic Architecture and*
14 *Landscapes*

15 Marla McEnaney, *Historical Landscape Architect*

16 Consultants

17 Commonwealth Heritage Group:

18 Laura Knott, *Project Manager*

19 Jane J. Jacobs, *Historical Landscape Architect*

20 Christina Osborn, *Historic Preservation Specialist*

21 Wiss, Janney, Elstner

22 Deborah Slaton, *Landscape Historian*

23 Timothy Penich, *Historical Architect*

24 Period Architecture

25 Christopher Quirk, *Historical Architect*

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Appendix A

1 Table of Mitigation Measures

2

Environmental Assessment Mitigation Table	
Resource	Mitigation
General Considerations/Site Design and Construction	<p>General:</p> <ul style="list-style-type: none"> ▪ Where necessary for resource or visitor protection, work areas would be identified with construction fence, silt fence, or some similar material prior to any activity. The fencing would define the work zone and confine activity to the minimum area required. All protection measures would be clearly stated in the construction specifications, and workers would be instructed to avoid conducting activities beyond the work zone. Disturbances would be limited to areas inside the designated construction limits. No machinery or equipment would access areas outside the work limits. ▪ Construction equipment staging would occur within previously disturbed areas as much as possible. All staging and stockpiling areas would be returned to preconstruction conditions following construction. Contractors would be required to properly maintain construction equipment (i.e., mufflers and brakes) to minimize noise. ▪ All tools, equipment, barricades, signs, surplus materials, and rubbish would be removed from the project work limits upon project completion. <p>Site Design and Construction:</p> <ul style="list-style-type: none"> ▪ Identify and avoid unstable slopes and local factors that can cause slope instability. ▪ Develop a stormwater management plan to ensure compliance with regulations and prevent off-site migration of contaminated stormwater or increased soil erosion. ▪ Minimize the planned amount of land to be disturbed. ▪ Re-establish the original grade and drainage patterns to the extent practicable.
Natural Resources	<p>Past and Ongoing:</p> <ul style="list-style-type: none"> ▪ Ongoing park staff management and maintenance of turf would continue. ▪ Ongoing maintenance of trees and other vegetation within the park would continue. ▪ When sites are disturbed by maintenance or construction activities, park staff would re-establish vegetation based on recommendations of existing resource plans.

Environmental Assessment Mitigation Table	
Resource	Mitigation
	<p>Future and Required:</p> <ul style="list-style-type: none"> ▪ Vegetation management would be consistent with the Cultural Landscape Treatment Plan recommendations and development of a comprehensive Vegetation Management Plan. ▪ Best Management Practices (BMPs) would be required to support the implementation and management of actions taken in the preferred alternative. Refer to established BMPs for water quality actions. The NOAA great Lakes Environmental Research Laboratory Strategic Plan and the Village of Put-in-Bay have established BMPs. ▪ Erosion and sediment controls would be employed as needed and as required by regulations during construction to reduce soil erosion. ▪ Natural resource management would be integrated in an overall program of cultural resource management of the historic designed landscape. ▪ When soil excavation is an unavoidable part of an approved facility development project, the National Park Service would minimize soil excavation, erosion, and offsite soil migration during and after the activity. ▪ Temporary barriers would be provided to protect existing trees and shrubs that are not identified for removal during construction activity. ▪ Vegetation filter strips would be used to filter and clean sediment, organic material, nutrients, chemicals, and other pollutants from urn-off water as it leaves a non-point source.
Cultural Resources	<p>Past and Ongoing:</p> <ul style="list-style-type: none"> ▪ Monitoring of archeological sites would occur to determine visitor safety and resource protection concerns. ▪ Monitoring water resource margins and shoreline would continue for erosion control. ▪ Monitoring the Memorial column and plazas for any damage, potential damage, or vandalism would continue. ▪ Prior to all construction or maintenance activities, cultural resources are identified and avoided to the extent possible.

Environmental Assessment Mitigation Table	
Resource	Mitigation
	<ul style="list-style-type: none"> ▪ Ongoing management focusing on retaining and enhancing the general historic character of the Memorial and Grounds would continue. <p>Future and Required:</p> <ul style="list-style-type: none"> ▪ All activities would comply with the Secretary of the Interior’s Standards and Guidelines for Preservation of Historical Buildings, Structures, the Cultural Landscape, and Archeology. ▪ All ABAAS accessibility interventions would be guided by Preservation Brief 32: Making Historic Properties Accessible. ▪ Site condition assessments by NPS-approved archeologists would be part of project-specific surveys. ▪ NPS would coordinate with the SHPO throughout the course of the project to protect and provide mitigation agreements for resources affected by the preferred alternative.
Visitor Use and Experience	<p>Past and Ongoing:</p> <ul style="list-style-type: none"> ▪ Incidences of human interactions would be monitored. ▪ Visitation data would be monitored through various methods such as visitor survey, transportation data, and concessioner data. ▪ Periodic visitor surveys and data collection would be used to determine visitor use patterns, visitor characteristics, visitor use conflicts, and visitor preferences and satisfaction with interpretive and recreational opportunities, programs, services and facilities. ▪ Resource condition surveys would be conducted as needed. ▪ Continued management of the Memorial and Grounds would facilitate the visitor’s understanding of the significance of the site and the Battle of Lake Erie in 1813. ▪ NPS facility managers would continue to monitor areas used by visitors for signs of vegetation disturbance, trampling, erosion, or the development of social trails in the designed historic landscape. ▪ Existing facilities would be retrofitted and new facilities designed to meet Leadership in Energy and Environmental Design (LEED) standards to demonstrate the NPS

Environmental Assessment Mitigation Table	
Resource	Mitigation
	<p>commitment to protect our natural and cultural resources for future generations.</p> <p>Future and Required:</p> <ul style="list-style-type: none"> ▪ Visitor use and access to areas of highly sensitive and vulnerable cultural or natural resources would require mitigation measures. Appropriate activities in these areas would be limited to research and passive recreational uses. Interpretive programs and exhibits would provide information and interpret ongoing research activities. ▪ Visitor Center would be made fully ABAAS accessible as will the pedestrian circulation system throughout the park, and the Memorial plazas to the extent decided upon.
Human Health and Safety	<p>Past and Ongoing:</p> <ul style="list-style-type: none"> ▪ General public would be informed of construction activities or other management or maintenance activities through press releases and general interpretive presentation. ▪ No public access would be allowed to any areas of construction. ▪ Appropriate regulatory and/or enforcement agencies would be notified prior to any construction to assist in safely managing pedestrian or vehicular traffic. Warning signs would be posted along village roads and pedestrian circulation in the park and the community. <p>Future and Required:</p> <ul style="list-style-type: none"> ▪ The ongoing and required measures already in place that ensure visitor safety would continue where appropriate in the implementation of the actions proposed in the preferred alternative. ▪ NPS staff would mitigate impacts arising from increases in visitation due to expanded facilities and interpretation at the park.

Appendix B

1 **Consultation Letters**



United States Department of the Interior

NATIONAL PARK SERVICE

PERRY'S VICTORY AND INTERNATIONAL PEACE MEMORIAL

93 Delaware Avenue, P.O. Box 549

Put-in-Bay, Ohio 43456-0549



PEVI 1.B.1.A.2

January 19, 2017

Amanda Schraner Terrell
Deputy State Historic Preservation Officer
Ohio History Connection
800 E. 17th Avenue
Columbus, OH 43211-2474

Re: Cultural Landscape Treatment Plan and Environmental Assessment
Perry's Victory and International Peace Memorial
Park Notification of Combination NEPA/Section 106 Compliance

Dear Ms. Terrell:

Perry's Victory and International Peace Memorial (PEVI) is a 14.5-acre national park in Ottawa County, Ohio. The site is located on South Bass Island, in the western basin of Lake Erie. The island is approximately three miles long by one mile wide. The park spans a narrow isthmus (about 250 yards wide) between the village of Put-in-Bay and the eastern portion of South Bass Island (see attached USGS maps). Much of the island is now developed as resort and summer housing, but farming and viticulture predominated in the past. The park is a commemorative, designed landscape associated with the Beaux-Arts School of design. Significant features include open lawns, trees and shrubs, sloped terraces, sidewalks, seawalls, and the raised plaza and memorial column standing at the center of the site. From the observation platform near the top of the memorial, visitors may view the site of the victory of U.S. Commodore Oliver Hazard Perry and his forces over those of the British Navy in the Battle of Lake Erie during the War of 1812. Set in the middle of its original grounds, the massive Doric column of Milford pink granite topped by an immense bronze lantern rises 352 feet, as if directly from the waters of that battle, to dominate the landscape (see attached photographs.) The column and its grounds are an excellent example of the harmony of building and landscaping that is integral to the Beaux-Arts style in America, with its monumental classicism in architecture set within a designed, formal landscape. Management of this site was transferred to the National Park Service (NPS) on July 6, 1936.

In 1976, National Park Service submitted a nomination for Perry's Victory and International Peace Memorial to the National Register of Historic Places, and the site was listed on July 25, 1979. The nomination included only part of the park within the original grant of the Perry's Victory and International Peace Memorial land to the U.S. The focus of the original nomination was the memorial column and its surrounding plaza. At the time the nomination was written, cultural landscapes were rarely recognized, and so were not discussed. Perry's Victory and International Peace Memorial was updated in 2014 to include further development of the park's grounds, expansions of the National Register's classification regarding Areas of Significance, refinement of other National Register Criteria, and the inclusion of cultural landscapes as nominated resources. In addition to the nomination and its

update, other planning documents developed for PEVI include: a cultural landscape report (1994), a cultural landscape inventory (2011), a long range interpretive plan (2011), and the park's foundation document (2012).

A NPS contractor is preparing an update of the 1994 cultural landscape report (CLR) for Perry's Victory and International Peace Memorial by providing at least two alternatives for a revised treatment plan, accompanied by an environmental assessment to meet requirements for federal environmental policy compliance. The existing CLR was completed prior to approval of CLR standards and lacks sufficient direction for moving forward with intentional design additions and management of the landscape. The park has accrued features based on various types of planning decisions during the twentieth century. Guidance for preservation, removal, or rehabilitation of features within the park boundaries is needed and essential for the development of comprehensive treatment plan alternatives that encompass the entire designed landscape of PEVI (see attached project boundary map).

To comply with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) of 1966, as amended, an environmental assessment (EA) must be developed that will evaluate impacts of the proposed action in the treatment plan alternatives to natural and cultural resources. In accordance with Section 800.8(3)(c) of the Advisory Council on Historic Preservation's regulations (36 CFR 800), I am notifying your office in advance of the park's intention to use the EA to meet its obligations under Section 106 of the NHPA. This EA, which will contain the Assessment of Effect for all cultural resources potentially affected by the proposed project, will be available for your review and comment later this year.

This letter also serves as notification that we have begun the federal compliance process, and in order to comply, we are gathering information concerning existing resources within the project area. During this early stage in the process, we are seeking information on any cultural resource restraint or concern that may be a possible planning issue. If you are aware of any such issue, please do not hesitate to contact us.

At this time, we anticipate no significant cultural resource impacts associated with the project, and we look forward to receiving any guidance or comments you may have regarding the process or the project itself. Thank you for helping in this matter, and if you need any additional information or should you have any questions regarding this request, please feel free to contact me at (419) 285-2184 ext. 1225 or in writing at Perry's Victory and International Peace Memorial, 93 Delaware Avenue, P.O. Box 549, Put-in-Bay, OH 43456-0549.

Sincerely,



Barbara Fearon
Superintendent

Enclosure

cc: Jane Jacobs, CHG



United States Department of the Interior

NATIONAL PARK SERVICE
PERRY'S VICTORY AND INTERNATIONAL PEACE MEMORIAL
93 Delaware Avenue, P.O. Box 549
Put-in-Bay, Ohio 43456-0549



PEVI 1.B.1.A.2

January 19, 2017

Dan Everson
Field Office Supervisor
Ohio Field Office
U.S. Fish and Wildlife Service
4625 Morse Road, Suite 104
Columbus, OH 43230
Phone: 614-416-8993
Email: Dan_everson@fws.gov

Re: Cultural Landscape Treatment Plan and Environmental Assessment
Perry's Victory and International Peace Memorial
Informal consultation with U.S. Fish and Wildlife for Threatened and Endangered Species

Dear Mr. Everson:

Perry's Victory and International Peace Memorial (PEVI) is a 25-acre national park in Ottawa County, Ohio. The site is located on South Bass Island, in the western basin of Lake Erie. The island is approximately three miles long by one mile wide. The park spans a narrow isthmus (about 250 yards wide) between the village of Put-in-Bay and the eastern portion of South Bass Island. Much of the island is now developed as resort and summer housing, but farming and viticulture predominated in the past. The park is a commemorative, designed landscape associated with the Beaux-Arts School of design. Significant features include open lawns, trees and shrubs, sloped terraces, sidewalks, seawalls, and the raised plaza and memorial column standing at the center of the site. From the observation platform near the top of the memorial, visitors may view the site of the victory of U.S. Commodore Oliver Hazard Perry and his forces over those of the British Navy in the Battle of Lake Erie during the War of 1812. Set in the middle of its original grounds, the massive Doric column of Milford pink granite topped by an immense bronze lantern rises 352 feet, as if directly from the waters of that battle, to dominate the landscape (see attached photographs.) The column and its grounds are an excellent example of the harmony of building and landscaping that is integral to the Beaux-Arts style in America, with its monumental classicism in architecture set within a designed, formal landscape. Management of this site was transferred to the National Park Service (NPS) on July 6, 1936. The approximate UTM coordinates of the site are listed below. (See attached USGS map)

Latitude/Longitude Coordinates

The 1979 National Register listing gives the UTM Coordinates of the center of the Memorial column as E17 349020 4612760.

Datum if other than WGS84: NAD83 (enter coordinates to 6 decimal places).

1. Latitude: -82.813499 Longitude: 41.654213
2. Latitude: -82.809440 Longitude: 41.655990

- | | |
|-------------------------|----------------------|
| 3. Latitude: -82.809440 | Longitude: 41.654572 |
| 4. Latitude: -82.811792 | Longitude: 41.652826 |
| 5. Latitude: -82.813501 | Longitude: 41.652896 |

A NPS contractor is preparing an update of the 1994 cultural landscape report (CLR) for Perry's Victory and International Peace Memorial by providing at least two alternatives for a revised treatment plan, accompanied by an environmental assessment to meet requirements for federal environmental policy compliance. The existing CLR was completed prior to approval of CLR standards and lacks sufficient direction for moving forward with intentional design additions and management of the landscape. The park has accrued features based on various types of planning decisions during the twentieth century. Guidance for preservation, removal, or rehabilitation of features within the park boundaries is needed and essential for the development of comprehensive treatment plan alternatives that encompass the entire designed landscape of PEVI (see attached project boundary map).

This letter serves as notification that we have begun the National Environmental Policy Act (NEPA) process and are proposing to have an Environmental Assessment (EA) available for public and regulatory review later this year. In addition, this letter serves as a record that the NPS is initiating informal consultation with your agency pursuant to Section 7 of the Endangered Species Act of 1973, that requires that a federal agency consult with the U.S. Fish and Wildlife Service or the National Marine Fisheries Service on any action that may affect endangered or threatened species or candidate species or that may result in adverse modification of critical habitat. The compliance process requires we request information concerning federal and state rare, threatened, and endangered species documented or reasonably suspected within 0.5 miles of the project site, which is depicted on the enclosed USGS Quadrangle. The project team reviewed the most current list of federally listed species that may occur in Ottawa County, Ohio.

The USFWS Ohio Field Office website identifies the following species as potentially present in Ottawa County, Ohio:

<u>Species</u>	<u>Federal Status</u>
Indiana Bat (<i>Myotis sodalis</i>)	(E)
Northern Long-eared Bat (<i>Myotis septentrionalis</i>)	(T)
Kirtland's Warbler (<i>Setophaga kirtlandii</i>)	(E)
Piping Plover (<i>Charadrius melodus</i>)	(E)
Eastern Prairie Fringed Orchid (<i>Platanthera leucophaea</i>)	(T)
Lakeside Daisy (<i>Tetraneuris herbacea</i>)	(T)
Rufa Red Knot (<i>Calidris canutus rufa</i>)	(T)
Eastern Massasauga (<i>Sistrurus catenatus</i>)	(PT)
Lake Erie Watersnake (<i>Nerodia sipedon insularum</i>)	(SC)
Bald Eagle (<i>Haliaeetus leucocephalus</i>)	(SC)

Important Note: This list reflects data available as of October 2015, and will change as new data becomes available.

E = Endangered	SC = Species of Concern
T = Threatened	CH = Critical Habitat
C = Candidate	P = Proposed (T/T/CH)

We would appreciate it if you would confirm the list of species to be addressed in the Cultural Landscape Treatment Plan/Environmental Assessment. Also, should you know of or come across any other resource constraint that may be a possible planning issue, please do not hesitate to contact us. We anticipate no significant environmental impacts associated with the project and look forward to receiving any guidance or comments you may have regarding the process or the project itself. Once prepared, we will provide you with a draft of the Treatment Plan/Environmental Assessment with preliminary effects determination and proposed mitigation, if any, for your review and concurrence.

Thank you for helping in this matter, and if you need any additional information or should you have any questions regarding this request, please feel free to contact me at (419) 285-2184 ext. 1225 or in writing at Perry's Victory and International Peace Memorial, 93 Delaware Avenue, P.O. Box 549, Put-in-Bay, OH 43456-0549.

Sincerely,



Barbara Fearon
Superintendent

Enclosure

cc: Jane Jacobs, CHG

United States Department of the Interior

FISH AND WILDLIFE SERVICE



Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994

February 21, 2017

Ms. Barbara Fearon
Superintendent
Perry's Victory and International Peace Memorial
93 Delaware Ave.,
P.O. Box 549
Put-in-Bay, OH 43456-0549

FAHLS# 03E15000-2017-TA-0803

Re: Cultural Landscape Treatment Plan and Environmental Assessment, Perry's Victory and International Peace Memorial

Dear Ms. Fearon,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

SPECIES OF CONCERN COMMENTS: The project lies within the range of the monarch butterfly (*Danaus plexippus plexippus*). The U.S. Fish and Wildlife Service (Service) has determined that listing under the ESA may be warranted and is currently conducting a status review of the monarch. Monarch butterflies are found throughout Ohio and some populations migrate vast distances across multiple generations each year. The Lake Erie islands provide important migration and stopover habitat for monarchs as they fly between the U.S., Mexico and Canada – a journey of over 3,000 miles. This journey has become more perilous for many monarchs because of threats along their migratory paths and on their breeding and wintering grounds. Monarch populations have declined significantly in recent years. Threats include habitat loss – particularly the loss of milkweed, the monarch caterpillar's sole food source – and mortality resulting from pesticide use.

Habitat within the project area is primarily composed of manicured lawn. The Service suggests that the Cultural Landscape Treatment Plan incorporate species of nectar-producing plants and milkweed endemic to the area where the mix is applied to benefit monarchs and other pollinators. The Service is partnering with groups across the state to identify and implement site-specific pollinator (including monarch) habitat restoration and management. We suggest that you contact Cody Grasser, 419-551-3875, cgrasser@pheasantsforever.org, who has expertise in planning and implementing pollinator habitat projects in northwest Ohio.

The project lies within the range of the **Lake Erie Watersnake** (*Nerodia sipedon insularum*), a state endangered species, and a Federal species of concern that was recently removed from the Federal list of Endangered and Threatened Wildlife and Plants due to recovery. The Watersnake is found on the offshore islands and in adjacent waters of Lake Erie. Watersnake summer habitat consists mainly of rocky shorelines with adjacent vegetation and shoreline structures such as crib docks. Winter hibernation habitat for the watersnake includes the island interior and the shoreline/vegetation interface. Currently the shoreline adjacent to the Perry's Victory and International Peace Memorial is primarily composed of a concrete seawall with some rock protection. Because of the vertical nature of the structure and the impact of wave scour, this area likely provides marginal summer habitat for Lake Erie Watersnakes. Summer habitat for Lake Erie Watersnakes could be improved by allowing vegetation to grow along the shoreline and incorporating more rock features close to the shoreline.

In order to avoid and minimize any impacts to the Lake Erie Watersnake and its habitat we recommend that any excavation or ground disturbance be completed between April 16 and October 14, and only then when the air temperature is above 60 degrees Fahrenheit for five consecutive days prior to excavation and on the day of excavation. These warm season temperatures allow the snakes to be warm enough to move out of harm's way if encountered during construction. If any Lake Erie Watersnakes are observed within the project area during construction they should not be harmed--intentional killing of Lake Erie Watersnakes is prohibited by state law. Further, we recommend implementation of the Service's Lake Erie Watersnake Post-Delisting Guidelines for Construction, Development, and Land Management (attached).

FEDERALLY LISTED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

Should the proposed site contain trees ≥ 3 inches dbh, we recommend that trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or

abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend that removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is being recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, summer surveys may be conducted to document the presence or probable absence of Indiana bats within the project area during the summer. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid federal permit. Please note that summer surveys may only be conducted between June 1 and August 15.

The proposed project lies within the range of the **Kirtland's warbler** (*Setophaga kirtlandii*), a federally listed endangered species. The Kirtland's warbler is a small blue-gray songbird with a bright yellow breast. This species migrates through Ohio in the spring and fall, traveling between its breeding grounds in Michigan, Wisconsin, and Ontario and its wintering grounds in the Bahamas. While migration occurs in a broad front across the entire state, approximately half of all observations in Ohio have occurred within 3 miles of the shoreline of Lake Erie. During migration, individual birds usually forage in shrub/scrub or forested habitat and may stay in one area for a few days. If clearing of suitable habitat cannot be avoided, to preclude adverse effects to migrating Kirtland's warblers, clearing within 3 miles of the shoreline of Lake Erie should not occur from April 22nd – June 1st, or from August 15th – October 15th.

No tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the National Park Service, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat, northern long-eared bat, and Kirtland's warbler, for our review and concurrence.

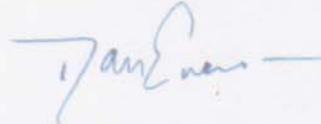
Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state

lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at john.kessler@dnr.state.oh.us.

If you have questions, or if we can be of further assistance in this matter, please contact Biologist Megan Seymour at (614) 416-8993 ext. 16 or Megan_Seymour@fws.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dan Everson". The signature is written in a cursive style with a horizontal line extending to the right.

Dan Everson
Field Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW
Cody Grasser, Pheasants Forever, cgrasser@pheasantsforever.org

Attachment: Lake Erie Watersnake Post-Delisting Guidelines for Construction, Development, and Land Management



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Rd., Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994

Lake Erie Watersnake Post-Delisting Guidelines for Construction, Development, and Land Management August 2011

The Lake Erie Watersnake (*Nerodia sipedon insularum*) was listed as "threatened" under the Endangered Species Act in 1999, but in August of 2011 was removed from the list due to recovery. Lake Erie Watersnake populations will continue to be monitored for 5 years to ensure the population persists at a stable level. The U.S. Fish and Wildlife Service (Service) has developed the following voluntary guidelines to assist island landowners in avoiding and minimizing impacts to Lake Erie Watersnakes during typical land management and construction activities. The Service strongly encourages island residents to follow these guidelines to protect watersnake habitat, ensure population persistence, and prevent re-listing of the subspecies. *Intentional killing of Lake Erie Watersnakes is still prohibited by State law.*

The Lake Erie Watersnake occurs on the islands in the western basin of Lake Erie. Summer habitat includes cliffs with crevices, rocky shorelines, and rock-filled structures such as docks, breakwalls, and shoreline erosion control structures. Lake Erie Watersnakes forage in Lake Erie for small fish, primarily round goby. Suitable winter hibernation sites include cracks and crevices in bedrock, rocky soils, animal burrows, tree root masses, and human-made structures such as foundations, drainage tiles, and building pads.

Shoreline Management

The island shoreline including areas adjacent to interior island ponds, inlets, bays, and marinas, are important habitat for Lake Erie Watersnakes as well as native birds, fish, amphibians, and mammals. Shoreline vegetation also helps to stabilize banks, prevent erosion, and promote water quality. Landowners are encouraged to avoid mowing within 69 feet (21 m) of the shoreline to protect these important habitat and water quality functions.

If shoreline mowing is necessary, mowing between April 15 and September 15 should be completed at dusk, when watersnakes will have taken cover for the night. Mowers should utilize a high setting, and the area to be mowed should be actively monitored for watersnakes. If Lake Erie Watersnakes are encountered during mowing, activities can cease until the snake has left the area on its own, or the snake can be removed to a location outside of the mowing area and near the shoreline.

Excavation or removal of shrubs, standing or downed trees, root masses, animal burrows, piled rocks, cliffs, or bedrock within 69 feet (21 m) of the shoreline, ponds, inlets, bays, and marinas should be avoided. If necessary, excavation of these features should only occur after April 15 and before October 15, when temperatures are above 60 degrees Fahrenheit. Within 69 feet (21 m) of shore, heavy machinery should be limited to paved areas so as not to harm watersnakes that may have retreated under rocks, logs, and other material.

The Service encourages preservation and construction of shoreline structures with designs beneficial to watersnakes. These include timber or steel crib docks and riprap erosion control structures instead

of concrete or sheet steel. Any project that will impact the shoreline or waters of Lake Erie **must** be coordinated with the Buffalo District of the U.S. Army Corps of Engineers (Corps) to ensure compliance with the Clean Water Act. The Corps can be contacted at (716) 879-4330.

Excavation

During hibernation, Lake Erie Watersnakes are unable to move and are vulnerable to any disturbance of their hibernation sites. Excavation of any kind in potential suitable winter hibernation habitat within 528 ft (161 m) of shore should be avoided between October 15 and April 15. Activities to be avoided include, but are not limited to, digging foundations, burying utility lines, removing tree roots or hollow tree bases, and destroying human-made structures such as foundations or drainage tiles.

Excavation activities occurring between April 16 and May 31, or between September 15 and October 14 should only be conducted when air temperatures are above 60 degrees Fahrenheit. The area should be actively monitored for snakes before and during excavation and any watersnakes found should be carefully removed to a location outside of the construction area and near the shoreline.

Any holes or trenches that are dug should be filled in as soon as possible to prevent watersnakes from inadvertently falling into them and becoming trapped. Holes or trenches should be inspected for Lake Erie Watersnakes before being filled.

Erosion Control

Mesh or woven erosion control fabrics or blankets should **NOT** be used to stabilize disturbed areas, as they have been documented to entangle and kill Lake Erie Watersnakes and other snake species. Loose straw or mulch can be used as an alternative.

Tree Removal

Tree root masses may provide suitable hibernation habitat for the Lake Erie Watersnake. If you plan to remove trees on your property, the Service recommends that only the above-ground portion of the tree be removed. The root mass should be left underground.

Summary of habitat management practices, timing, and location where applicable.

Time	Location	Recommendation
Oct 15-April 15	Within 528 feet (161 m) of shore	No Excavation.
April 16-May 31	Within 528 feet (161 m) of shore	Excavation only when temperature above 60° F. Mow at dusk, on high setting.
June 1-Sept 14	Within 69 feet (21 m) of shore	Mow at dusk, on high setting.
Sept 15-Oct 14	Within 528 feet (161 m) of shore	Excavation only when temperature above 60° F. Mow at dusk, on high setting.

Further Information

The Service is available to provide technical assistance regarding the Lake Erie Watersnake, proposed development projects, and land management activities. Questions should be directed to the Service at (614)416-8993. Additional information about the Lake Erie Watersnake is also available at our website: http://www.fws.gov/midwest/Ohio/Endangered_LEWS.html and at www.RespectTheSnake.com.

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