



VISITOR ACCESS AND CIRCULATION PLAN

SECTION 106 ASSESSMENT OF EFFECTS



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EXECUTIVE SUMMARY

The National Park Service (NPS) is developing a Visitor Access and Circulation Plan (Plan) for Antietam National Battlefield (the Battlefield) to comprehensively address public access to the lands and resources managed by the Battlefield. Antietam National Battlefield is in Sharpsburg, Maryland, in a rural area of south Washington County, Maryland. The 3,263-acre Battlefield encompasses a large portion of the lands on which the 1862 Battle of Antietam was fought during the Civil War. As a federal undertaking, this project is subject to historic preservation consultation in compliance with section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended.

The National Park Service has developed two alternatives for the Visitor Access and Circulation Plan as part of the National Environmental Policy Act of 1969, as amended (NEPA) process. This memorandum addresses anticipated effects of the implementation of the NPS preferred action alternative, Alternative B: Proposed Action Alternative, on historic properties that are identified as historic structures, cultural landscapes, and archeological resources in this memorandum. The alternatives are additionally compared and assessed in an environmental assessment (EA) prepared separately for the Visitor Access and Circulation Plan.

The implementation of individual elements of the Visitor Access and Circulation Plan may have the potential to impact historic properties and/or their contributing features. However, because each element will be implemented in strict accordance with the Plan and the guidance set forth by the Secretary of the Interior's Standards for the Treatment of Historic Properties, and in close consultation with the Maryland Historical Trust – state historic preservation officer (SHPO), these potential impacts will be avoided or minimized. As a result, the National Park Service has determined that the overall implementation of the Visitor Access and Circulation Plan (alternative B) will have no adverse effect on historic properties conditioned on the fact that, as laid out in the 2008 NPS programmatic agreement, each element of the Plan as it is implemented will undergo consultation. As funding becomes available to implement the Plan, each project may be subject to additional section 106 consultation with the Maryland SHPO, as needed, understanding that some projects may be undertaken as outlined in the NPS nationwide 2008 programmatic agreement.

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INTRODUCTION

The National Park Service (NPS) is developing a Visitor Access and Circulation Plan (Plan) for Antietam National Battlefield (Battlefield) to comprehensively address public access to the lands and resources managed by the Battlefield. The Battlefield's purpose is to preserve, protect, restore, and interpret for the benefit of the public the resources associated with the Battle of Antietam and its legacy. This Plan's intent is to improve visitor orientation, access, and safety at the Battlefield by improving visitor circulation so as to enhance the overall visitor understanding about the historic events of the battle and its legacy. The Plan also serves to amend the Battlefield's 1992 general management plan (GMP) as it pertains to visitor circulation, the visitor center, roads associated with the interpretive tour route, and tour stops.

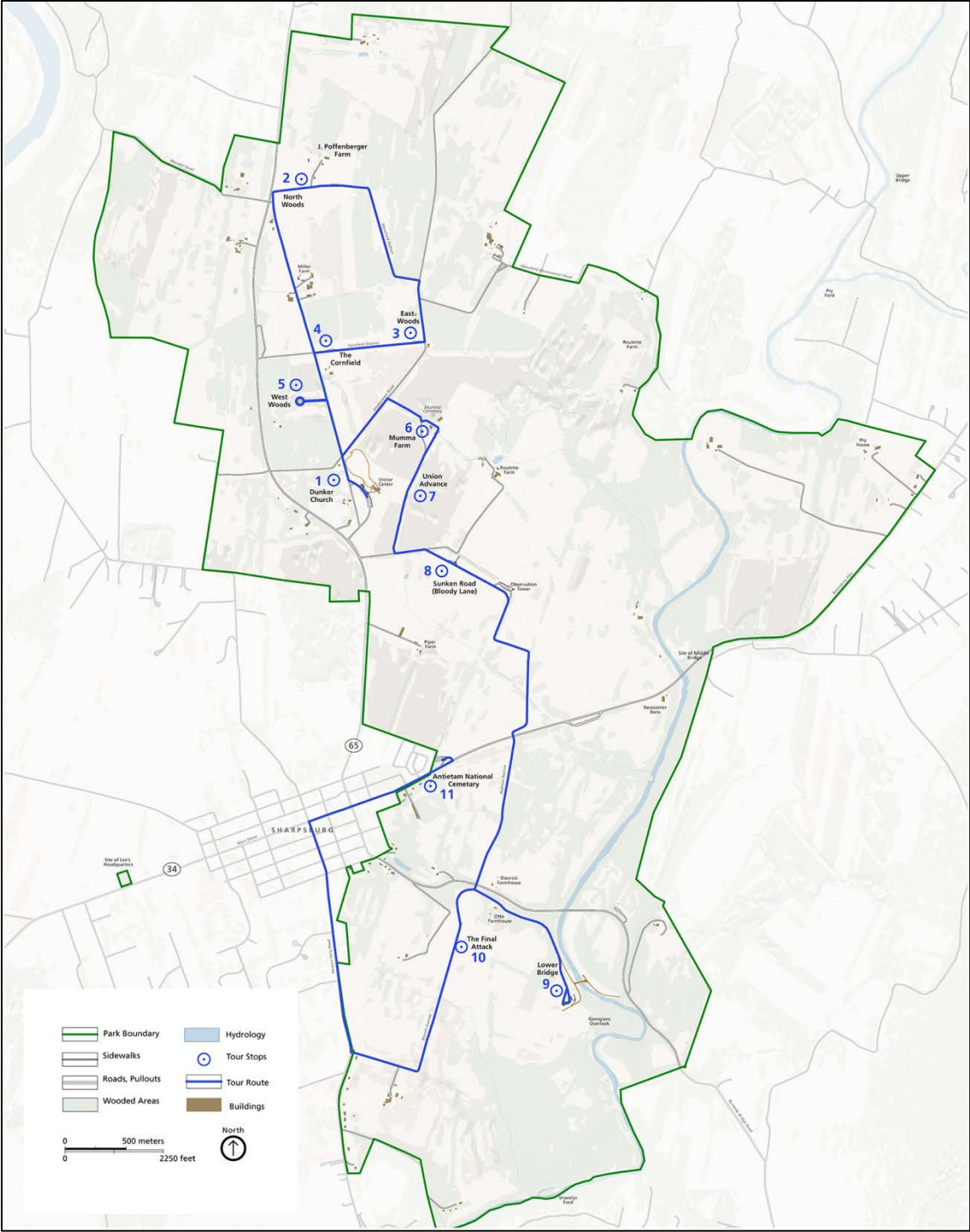
As a federal undertaking, this project is subject to section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and its implementing regulations (36 *Code of Federal Regulations* [CFR] Part 800) "Protection of Historic Properties" (section 106). This assessment of effect has been prepared as part of the continuing consultation between the National Park Service and the Maryland state historic preservation officer under the Maryland Historical Trust. Section 106 consultation for the current Visitor Access and Circulation Plan and Environmental Assessment (EA) was initiated with the Maryland Historical Trust in a letter dated January 6, 2017 (appendix A).

In support of the Plan, the National Park Service has developed this memorandum to document the presence of historic properties, defined as those that are listed or eligible for listing in the National Register of Historic Places (NRHP) for the purposes of section 106 review. Identification of historic buildings, structures, sites, objects, and districts; cultural landscapes; and potential archeological sites was undertaken within the area of potential effect (APE) established for this project. The APE is defined as the Antietam National Battlefield legislated park boundary (figure 1). The National Park Service consulted with the Maryland Historical Trust regarding the APE in their letter dated January 6, 2017, and received concurrence with the proposed APE boundary in a letter of response dated January 20, 2017 (appendix B). Work was directed and conducted by staff that meet *The Secretary of the Interior's Professional Qualification Standards* (36 CFR Part 61) in the disciplines of architectural history and history.

As part of the NEPA process, the National Park Service developed a set of preliminary proposed actions to consider for the Plan and sought public feedback on these preliminary actions during public scoping meetings as part of the project initiation and scoping. These proposed actions focused on the preservation of historic structures at the Battlefield, such as the visitor center and the roads associated with the interpretive tour route, as well as ways to provide access to recently acquired lands and for expanding recreational opportunities such as developing additional trails. After a comment period from the public and stakeholders, the National Park Service developed and selected a preferred alternative (alternative B) because it best addresses the purpose

and need of the project and provides a balance between the preservation of significant resources and expansion of visitor opportunities for recreation and interpretation throughout the Battlefield. The undertaking that is the focus of this memorandum is alternative B, and the potential effects of the implementation of the recommended actions in that alternative are also discussed.

FIGURE 1. AREA OF POTENTIAL EFFECT



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PROJECT DESCRIPTION

VISITOR ACCESS AND CIRCULATION PLAN FOR ANTIETAM NATIONAL BATTLEFIELD

The Visitor Access and Circulation Plan for Antietam National Battlefield proposes to improve visitor access to, and circulation within, the Battlefield in order to enhance visitor experience and increase opportunities to connect with Battlefield resources. Key elements of the Plan include the visitor center, Battlefield tour roads, tour stops, and trails. Lands and resources acquired since the Battlefield completed its general management plan in 1992 will also be integrated into this Plan. The Plan also serves to amend the Battlefield's 1992 general management plan as it pertains to visitor circulation, the visitor center, internal roads, and tour stops. These elements are described below (also see figures 2, 3, and 4). The National Park Service would implement the projects described below in stages as funding becomes available.

Visitor Center

The Battlefield's current 1962 visitor center would be retained. The visitor center would be managed as a historic structure following the guidelines set forth by *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. To improve traffic flow, the traffic direction to the visitor center entrance and parking area would be made one-way, directing visitors to exit north onto the historic Hagerstown Turnpike to begin the interpretive tour route. No changes to the parking area infrastructure would be required.

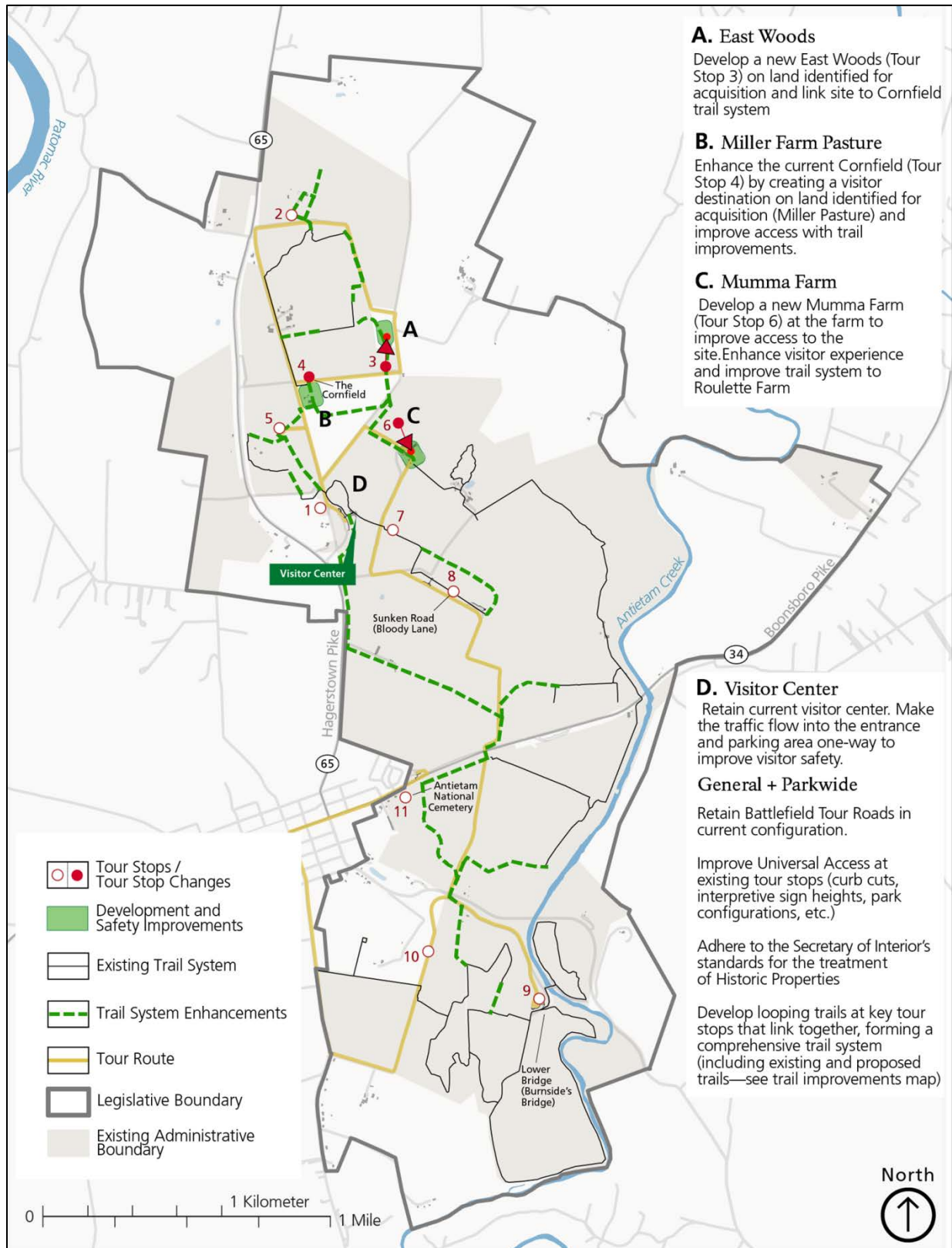
Battlefield Tour Roads

Amending the general management plan, all existing Battlefield tour roads, including Starke Avenue, Cornfield Avenue, the surviving remnant of Confederate Avenue, and the section of Richardson Avenue parallel to Bloody Lane, would be retained in their current configuration and use.

Tour Stops

Improvements would be made to three tour stops to enhance visitor interpretive opportunities in the areas of the East Woods (tour stop 3), Mumma Farm (tour stop 6), and the Cornfield (tour stop 4). At the East Woods and Mumma Farm, the existing tour stop infrastructure, such as vehicle pull-offs, would remain in place, but they would

FIGURE 2. PROPOSED UNDERTAKING



no longer be called “tour stops” on the park’s interpretive tour map. In those two areas, two new tour stop locations would be constructed along the Battlefield tour roads in order to better support interpretive programming. The Cornfield (tour stop 4) infrastructure along the Battlefield tour road (e.g. additional vehicle parking) would be expanded to support interpretive programming. Please refer to appendix E for photographs and descriptions of the current conditions of the Battlefield tour stop.

The new location for East Woods (tour stop 3) and the expanded Cornfield (tour stop 4) are being proposed on land currently in private ownership by the Civil War Trust but within the Battlefield’s legislated boundary. The Civil War Trust is actively restoring these properties to their 1862 appearance and has expressed interest in working with the National Park Service on enhancing visitor experience and access at these locations.

- **East Woods (tour stop 3).** While the existing East Woods tour stop infrastructure at the north side of Cornfield Avenue would remain in place for visitor use, a new tour stop would be constructed northward into the East Woods, along the west side of Smoketown Road. Positioned with views through the woods to open fields, this new location for the interpretive tour stop would create a more immersive Battlefield experience for visitors and would provide a visual connection to the Mansfield Monument, enhancing interpretive opportunities.
- **Cornfield (tour stop 4).** The triangular property known as the Miller Pasture was a focal area of some of the bloodiest fighting during the opening hours of the battle. Because areas of the Miller Pasture offer 360-degree views of the landscape, this location would improve the interpretation of the battle in this area and provide an ideal setting to expand visitor experience through the creation of an interpretive plaza and expanded parking at the Cornfield. The development of a low-profile interpretive plaza area at this tour stop location aligns with the Battlefield’s 1992 GMP guidance. In addition to this plaza, the existing infrastructure that currently comprises tour stop 4 would also remain in place for visitor use.
- **Mumma Farm (tour stop 6).** This tour stop would be relocated from its current location at the Mumma Cemetery to be closer to the Mumma farmstead buildings in order to improve access to this site. This tour stop would allow the Battlefield to expand visitor services at this location, enhance interpretive opportunities related to the story of the Mumma family and other civilians impacted by the battle, and encourage visitors to explore the nearby Roulette farmstead. Consideration would be given to the placement of the vehicular access improvements for the purpose of having the least impact on the farmstead landscape and historic Mumma Lane. The narrow roadside pullout at the Mumma Cemetery that currently serves as tour stop 6 would remain in place for visitor use.

To improve universal access for visitors of all abilities, the design of tour stop infrastructure (e.g., curb cuts, sidewalks, and vehicular parking) would be brought into

compliance with the Architectural Barriers Act Accessibility Standards (ABAAS). To create a consistent visitor experience, any improvements to address universal access or relocation of tour stops would be designed in a similar size, scale, and mass as existing tour stops found on the Battlefield interpretive tour route. Please refer to appendix E for photographs and descriptions of representative Battlefield tour stops that would serve as models for these new tour stops. Similar materials would also be used to ensure continuity of the overall interpretive tour route appearance. Battlefield tour stops generally include pull-in parking spaces, an impervious perimeter sidewalk, low-profile (3 feet [ft] to 4 ft tall) retaining walls constructed of local stone materials and interpretive wayside signage designed to meet NPS design standards. Treatment recommendations would be drawn from cultural landscape reports that meet *The Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes* to ensure that these improvements retain the character-defining features of cultural landscapes.

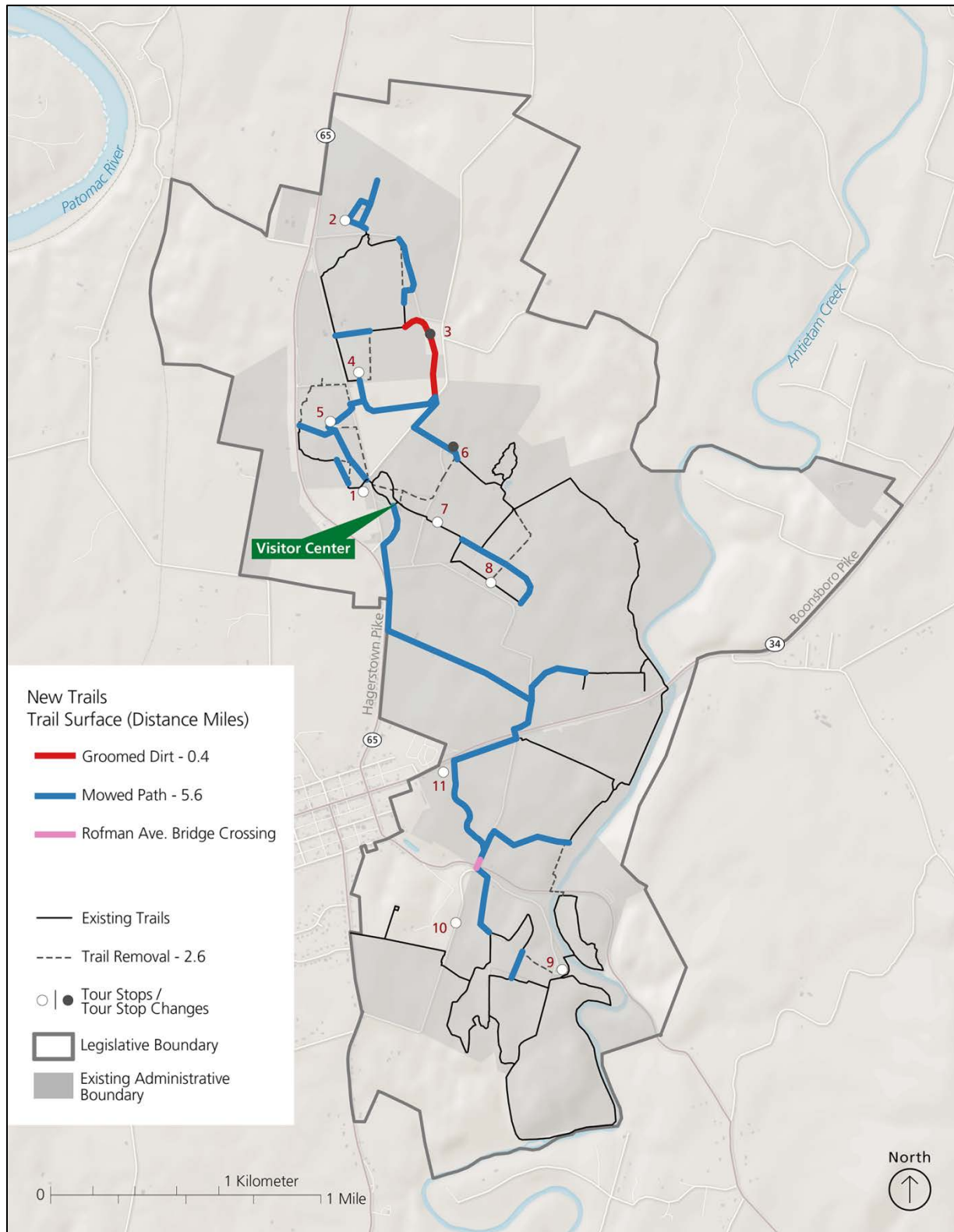
Trail System

A comprehensive trail system would realign existing trails with new trails in order to create a variety of visitor opportunities to explore the Battlefield as well as the cultural and natural environment (see tables 1 and 2 and figures 3 and 4). Building on approximately 13.0 miles of existing trails, an additional 6.0 miles of new trails would be constructed, while 2.6 miles of existing trail would be removed and rehabilitated to reflect the existing landscape. The additional trails would be designed to have a similar look and feel as existing Battlefield trails, ranging in width from 18 inches to 24 inches and following sustainable trail guidelines for any trail construction including the use of appropriate grades and side slopes, water bars, and a curvilinear alignment suitable to the area. Additional mowed pathways would not involve ground disturbance. The construction of maintained dirt trails would involve vegetation clearance and minimal ground disturbance as required by the terrain. This comprehensive trail system would create an additional 5.6 miles of mowed pathways and 0.4 mile of maintained dirt trails, with no new gravel paths or paved trails (table 1 and figure 3).

TABLE 1. PROPOSED CHANGES IN TRAIL SYSTEM SURFACES

Trails	Paved (Miles)	Gravel (Miles)	Groomed Dirt (Miles)	Mowed (Miles)	Total
Existing Trails	1.0	1.0	2.5	8.5	13.0
New Trail Segments	0.0	0.0	0.4	5.6	6.0
Removed Trail Segments	0.0	0.0	0.2	2.4	2.6

FIGURE 3. PROPOSED ACTION TRAIL SYSTEM; NEW TRAILS AND SURFACES



Perimeter Trail. Consisting of existing trails and additional new trail segments, an 11-mile-long perimeter trail would allow visitors to hike the entire circumference of the Battlefield, starting and ending at the visitor center (see table 1 and figure 4). This perimeter trail would provide visitors with an opportunity to safely hike around the entire Battlefield. One segment of the perimeter trail would cross over the modern Boonsboro Pike (State Route 34) at the same crossing used by visitors to the National Cemetery. In order to develop an at-grade pedestrian crossing at this location, Battlefield staff would work in collaboration with the Maryland State Highway Administration (MDSHA) to identify strategies for improving connectivity between the northern and southern halves of the Battlefield. Another segment of the perimeter trail would use the Rodman Avenue bridge crossing over the modern Burnside Bridge Road. This bridge also forms part of the Battlefield's interpretive tour route and special consideration would have to be given to appropriate signage and guardrail height to ensure pedestrian safety, while minimizing impacts to the character-defining features of this historic Mission 66-era bridge. Stairs would also be installed on the slope near the Otto farmstead as part of the perimeter trail and as a connection to the Final Attack Trail on the southern half of the Battlefield. The stairs would be screened by vegetation and located so they would not be visible from the Otto farmstead landscape.

Battle Action Looping Trails. Consisting of existing trails and additional new trail segments, the development of Battle Action looping trails would provide shorter immersive experiences at key tour stops throughout the Battlefield. These shorter Battle Action looping trails focus on specific locations where significant events of the battle unfolded, and would begin and end at associated tour stops. These Battle Action looping trails would give visitors a range of options to get out of their vehicle to explore and contemplate the key moments of the Battle of Antietam and immerse themselves in the surrounding environment (see table 1 and figure 4).

Universally Accessible Trails. Adjacent to the visitor center, the 0.25-mile Antietam Remembered walking trail loop would be modified to meet ABAAS for width, materials, and slope to allow universal access. This would also apply to the paved walkway leading to the entrance of Dunker Church, which currently does not meet the width and slope requirements for ABAAS accessibility. Where possible, the proposed Battle Action looping trails would be designed to be universally accessible, to be determined on a case-by-case basis depending on the terrain and slope conditions of these locations.

TABLE 2. TRAIL ENHANCEMENTS UNDER THE PROPOSED UNDERTAKING

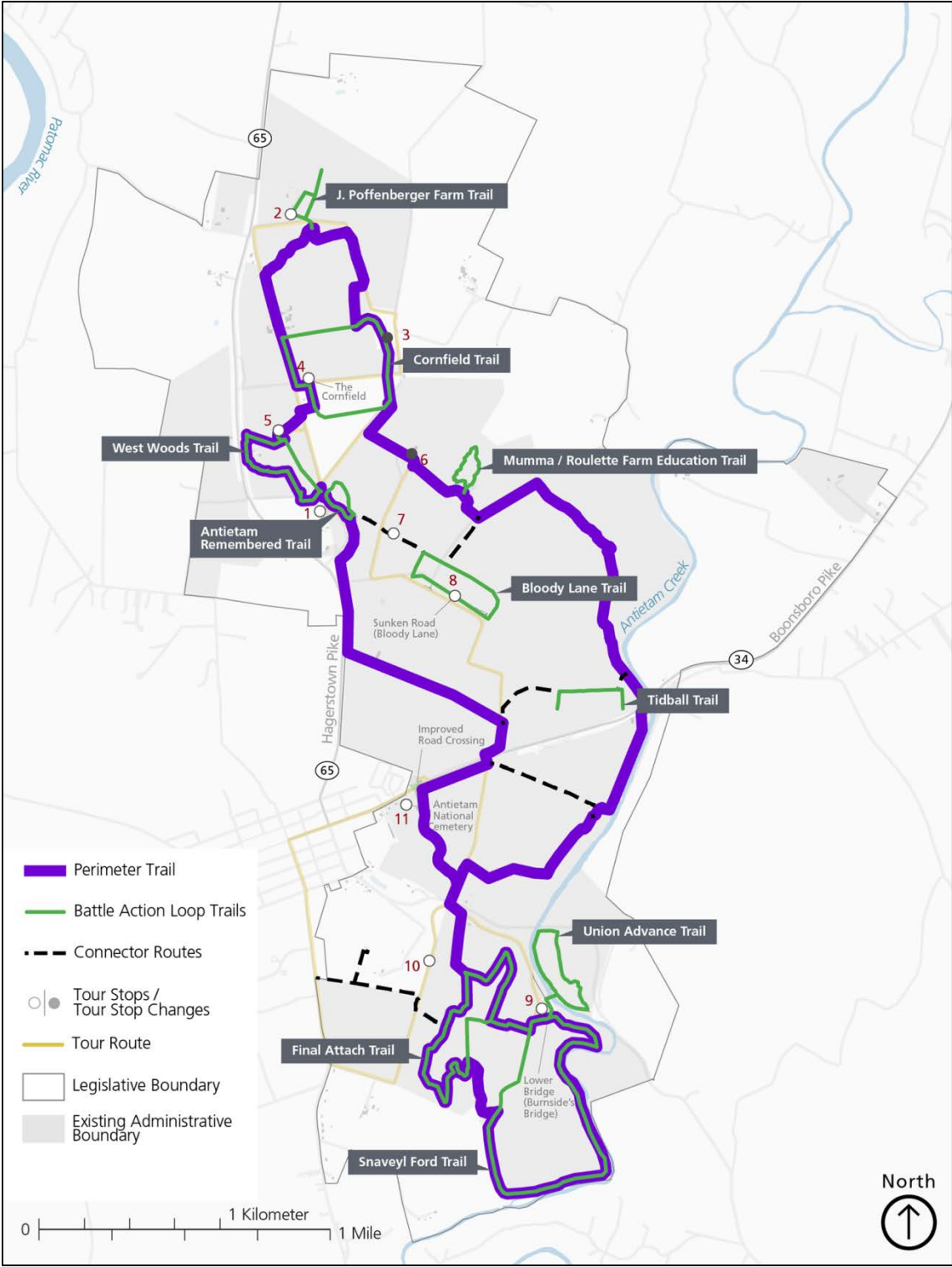
Trail Name	Description
Perimeter Trail	Beginning and ending at the visitor center, an 11-mile-long perimeter trail would allow visitors to hike the entire length of the Battlefield. The perimeter trail would incorporate sections of shorter Battle Action looping trails as well as existing Battlefield trails including the Three Farm Trail, Sherrick Farm Trail, and portions of the Antietam Battlefield Historic Trail (Scout Trail). To fully connect the perimeter trail into one comprehensive loop, Approximately 19,500 linear ft of additional trails would be developed. Approximately 5,400 linear ft of existing trail would also be removed to improve connectivity and these areas would then be rehabilitated to reflect the existing landscape. New perimeter trail segments would range from 18 inches to 24 inches in width and consist primarily of mowed paths. The perimeter trail would cross over the modern Boonsboro Pike, requiring an at-grade pedestrian crossing. This trail would also use the Rodman Avenue bridge, requiring appropriate signage and safety measures to ensure multimodal access.
Antietam Remembered Trail	Battle Action Looping Trails. Adjacent to the visitor center, the 0.25-mile Antietam Remembered walking trail loop would be modified to meet ABAAS for width, materials, and slope to allow universal access. This would also apply to the paved walkway leading to the entrance of Dunker Church (tour stop 1), which currently does not meet the width and slope requirements for ABAAS accessibility. No additional trails lengths are planned for this paved looping trail.
J. Poffenberger Farm Trail	Battle Action Looping Trails. Beginning and ending at the North Woods (J. Poffenberger Farm) (tour stop 2), a new looping trail would be established at this location. Approximately 2,100 linear ft of trail would be created to provide visitor access to this historic farmstead. This trail would range from 18 inches to 24 inches in width and consist of a mowed path surface. The trail would use existing historic lanes and follow existing fencelines to reflect the historic setting of this farmstead.
Cornfield Trail	Battle Action Looping Trails. Beginning and ending at the Cornfield (tour stop 3), this trail would use existing trails, close certain trail segments, and establish new trail segments. This trail would provide visitor access to the East Woods (tour stop 3), and segments of this looping trail would also provide access to the Miller Pasture property, currently owned by the Civil War Trust. Taking into account existing field configuration, approximately 2,600 linear ft of additional mowed trail would be added in a way that is compatible with lands in agricultural production. In order to provide access through the East Woods, roughly 2,100 linear ft of groomed dirt trail would be developed. These new trail segments would range in width from 18 inches to 24 inches. Approximately 1,170 linear ft of the existing trail that bisects the Cornfield would be removed, allowing for the field's restoration to its historically significant appearance.
West Woods Trail	Battle Action Looping Trails. Beginning and ending at the West Woods (tour stop 5), this trail would use existing trails, close certain trail segments, and establish new trail segments. This circular trail would provide access to Dunker Church (tour stop 1) and allow visitors to explore the West Woods area of the Battlefield. Approximately 2,400 linear ft of mowed path trail would be developed, while approximately 5,200 linear ft of trail would be removed. These new trail segments would range in width from 18 inches to 24 inches.

Trail Name	Description
Bloody Lane Trail	Battle Action Looping Trails. Beginning and ending at Bloody Lane (tour stop 8), this trail would be reconfigured to allow visitors to walk the Confederate position along the Bloody Lane, and then loop around to explore the advancing Union line in a circular pattern. Segments of the existing trail that are in the historic Bloody Lane would continue to be used. Approximately 2,500 linear ft of additional mowed paths would be developed and run through fields before looping back into the historic Bloody Lane at the Observation Tower. New trail segments would range in width from 18 inches to 24 inches, consisting of mowed paths. Approximately 1,800 linear ft of existing trail would be removed and restored to reflect the existing landscape.
Tidball Trail	Battle Action Looping Trails. Starting at the Newcomer House, no changes are proposed.
Union Advance Trail	Battle Action Looping Trails. Starting and ending at Burnside Bridge (tour stop 9), no changes are proposed.
Snaveley Ford Trail	Battle Action Looping Trails. Starting and ending at Burnside Bridge (tour stop 9), no changes are proposed.
Final Attack Trail	Battle Action Looping Trails. Beginning and ending at Burnside Bridge (tour stop 9) the Final Attack Trail would remain largely in its current configuration. In order to improve connectivity and wayfinding for visitors, approximately 550 linear ft of mowed path would be added. This new trail segment would range in width from 18 inches to 24 inches. Approximately 700 linear ft would be removed and restored to reflect the existing landscape.
Mumma / Roulette Farm Education Trail	Other Trails. No changes are proposed.
Hawkin's Zouave Trail	Other Trails. Under alternative B, there would be no changes to this trail.

AREA OF POTENTIAL EFFECT

The area of potential effect (APE) for historic structures and cultural landscapes is identical with that defined in the environmental assessment for these resources, encompassing the Antietam National Battlefield legislated park boundary (see figure 1). The APE is coterminous with the Battlefield's legislated park boundary because none of the proposed work would be visible beyond that boundary. Furthermore, the volume of traffic that would be generated by the undertaking would be at a level that it would not affect historic resources beyond this boundary.

FIGURE 4. PROPOSED ACTION TRAIL MAP



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HISTORICAL SUMMARY FOR ANTIETAM NATIONAL BATTLEFIELD

Antietam National Battlefield was established to commemorate the Battle of Antietam or Sharpsburg, fought on September 17, 1862. About 40,000 troops of the Confederate Army of Northern Virginia under the command of General Robert E. Lee fought against 80,000 troops of the Federal Army of the Potomac commanded by General George McClellan. At day's end, more than 23,000 soldiers were dead, wounded, or missing. According to many historians, the Battle of Antietam was a major turning point in the American Civil War. This Union victory provided President Lincoln the opportunity to issue the preliminary Emancipation Proclamation and contributed to Great Britain's and France's decision to postpone recognition of the Confederacy. From that time onward, the American Civil War had a dual purpose— to preserve the Union and abolish slavery.

Commemorative efforts at the Antietam Battlefield began shortly after the end of the Civil War. The Antietam National Cemetery was dedicated in 1867 as an honorable final resting place for Union dead. Congress established Antietam National Battlefield on August 30, 1890, declaring:

All lands acquired by the United States. . .for the purpose of sites for tablets for marking of the lines of battle of the Army of the Potomac and of the Army of Northern Virginia at Antietam, and of the position of each of the forty-three different commands of the Regular Army engaged in the battle of Antietam, shall be under the care and supervision of the Secretary of War (16 United States Code [USC] 446, August 30, 1890).

Like other early Civil War Battlefield parks, Antietam National Battlefield was administered by the United States War Department. The War Department constructed a number of roads through the Battlefield to provide viewer access to important points on the landscape, which remained privately owned, erected almost 300 metal tablets documenting troop movements and artillery locations, and constructed a stone observation tower along the Sunken Road. In addition, during the last quarter of the 19th century and opening decades of the 20th century, states' and veterans' organizations erected monuments and memorials to honor the fallen (NPS 1992). In 1933, through Executive Order 6166, the National Park Service took over management responsibilities for all national Battlefields and military parks that had been under the jurisdiction of the War Department.

In 1960, Congress enacted additional legislation stating "...the Secretary finds necessary to preserve, protect and improve the Antietam Battlefield comprising approximately 1,800 acres in the State of Maryland...to assure the public a full and unimpeded view thereof, and to provide for the maintenance of the site in, or its restoration to, substantially the condition in which it was at the time of the battle of Antietam" (16 USC 430oo). As part of the preparations for the Centennial of the Civil War and the 100th anniversary of the Battle of Antietam, the National Park Service built the current visitor center at Antietam Battlefield in 1962. The 1960s also marked the ambitious NPS program to update visitor services and facilities throughout the national park system for

the 50th anniversary of the agency in 1966. The program of improvements was known as Mission 66 and focused on improving park infrastructure and visitor experience through the creation of facilities such as the tour road and visitor center. The program also added interpretative elements into the Battlefield landscape. Additional lands were acquired to protect and preserve the scene of the battle. In 2017, the National Park Service determined that Mission 66 landscape that was built between 1960 and 1967 is eligible for listing in the National Register of Historic Places and submitted an amendment to the Antietam National Battlefield national register nomination to the Maryland state historic preservation officer in October 2017 (NPS 2017b).

In 1992, the National Park Service approved a general management plan for Antietam National Battlefield. The general management plan emphasized the restoration of the 1862 Battlefield landscape and called for the removal of the visitor center and some War Department and Mission 66-era roads. At the time of the GMP completion, the Battlefield owned 946 acres within its legislated boundary, and many of the recommendations concerning visitor access and circulation were limited to the existing lands that the Battlefield could provide access to.

The entire Battlefield, including private property within the boundary, is listed in the National Register of Historic Places as a historic district. Many structures and outbuildings remain from the historic period, including the Miller, Mumma, Piper, Pry, Otto, and Sherrick farmsteads. Miller's Cornfield, Bloody Lane, and Burnside Bridge represent three key areas where significant fighting occurred during the battle. Several structures and features added to the Battlefield since the war have become historic in their own right. These include Antietam National Cemetery, a burial site for 4,776 Federal soldiers; the road system established by the War Department in the 1890s; almost 100 monuments that commemorate the soldiers who fought at Antietam; numerous tablets placed by the War Department; and the observation tower overlooking Bloody Lane. The 1960-67 Mission 66-era structures on the Battlefield, including the visitor center and associated structures such as parking areas and stone walls also contribute to Antietam's historic significance.

EXISTING CONDITIONS

Antietam National Battlefield is in Sharpsburg, Maryland, in a rural area of south Washington County, in western Maryland and in the Northern Piedmont ecoregion. The Northern Piedmont is a transitional region of low rounded hills, irregular plains, and open valleys in contrast to the low mountains to the north and west and the flatter coastal plains region to the east. The physical landscape at Antietam National Battlefield consists of flat to gently rolling plains with forested areas and Antietam Creek running adjacent to and through key Battlefield areas.

While natural forest vegetation was predominantly Appalachian oak forest at the time of the battle, settlers cultivated floodplains as farmland and there were few areas of native vegetation communities along the rivers. Today, large forested areas along the rivers serve as a buffer between the agricultural fields, waterways, and nearby roads and highways that traverse the Battlefield. The forested areas consist primarily of mixed deciduous oak forest, common to the eastern United States.

Antietam Creek meanders along portions of the eastern edge of the Battlefield, entering the Battlefield just north of the Burnside Bridge area. The Boonsboro Pike (State Route 34) runs east to west through the Battlefield. The Sharpsburg Pike (State Route 65) runs north to south through portions of the Battlefield and serves as the primary vehicular access route to the visitor center.

The Battlefield is considered one of the best-preserved Civil War units in the national park system. The farms and farmlands in and near the Battlefield appear much as they did on the eve of the battle in 1862. Much of the Battlefield and the surrounding area has an agricultural character with farm buildings and crops surrounded by wooded areas configured as hedgerows in some locations. The rolling topography and screening provided by wooded areas helps retain a historic context and allows visitors to imagine Battlefield movements across the open fields.

Of the 3,263 acres within the Battlefield boundary, 1,937 acres are owned in fee by the federal government and managed by the National Park Service to maintain the historic setting and provide for visitor use. Another 820 acres are in partial federal ownership (less than fee)—these include privately owned land with easements held by the federal government that restrict the levels and types of allowable development. The remaining 506 acres are privately owned. Most privately owned lands are farmed by local residents.

Antietam National Battlefield contains multiple trails, historic structures, landscapes, interpretive features, and facilities that are accessible to visitors. The 11-stop interpretive tour route provided by a brochure available in the visitor center directs visitors to a chronological, self-guided auto tour of the Battlefield. Following a paved roadway, visitors drive through and stop at areas of historical interest, tracing troop movements, interpreting battle tactics and military strategy, and relating human interest stories. Additional interpretation is provided at the visitor center. However, many

historic properties and resources remain difficult or impossible for visitors to access. The circulation, both vehicular and pedestrian, is fragmented and lacks universally accessible routes. Many of the interpretive trails consist of fragments and short sections, and lack a loop route or access to key battle locations (such as the East Woods and the Miller Pasture). As a result, some key historic sites and views are not interpreted due to a lack of access.

The Battlefield's visitor center, completed in 1962 during the "Mission 66" era of NPS park development, provides a lobby with information desk, theater, lower-level museum exhibits, upper level observation room, restrooms, and museum store. Since 2010, Antietam National Battlefield has averaged 385,000 visitors each year). In 2016, monthly visitation to the visitor center ranged from 4,000 visitors in January to 32,000 in July. The Battlefield also receives a number of bus tours throughout the year.

HISTORIC STRUCTURES

One historic structure has the potential to be affected by the actions proposed in this Plan: the Battlefield visitor center. For the purpose of this Plan, the historic Battlefield tour roads and associated bridges are described and analyzed under the cultural landscapes resource topic. There are many other historic structures at the Battlefield but they are not described here since they would not be affected by the proposed actions of this Plan.

Opened in 1963, the Antietam National Battlefield visitor center is eligible for listing in the National Register of Historic Places for its contributions to the NPS use of modern architecture during the "Mission 66" initiative. Built into a hillside overlooking the Battlefield, the visitor center displays many architectural features that are emblematic of the "Park Service Modern" style developed by the National Park Service as part of the Mission 66 program (NPS 2017b).

CULTURAL LANDSCAPES

Cultural landscapes that have the potential to be impacted by this Plan are the 1862 Battlefield Landscape, Antietam National Cemetery, the Commemorative Landscape(all three defined by the 2013 Antietam National Foundation Document), and the Mission 66 Landscape (defined in a 2017 NRHP nomination update). These cultural landscapes are described below.

Cultural landscapes include the features and systems that compose the existing landscape and convey the historic character of the landscape associated with a historic period of significance. Cultural landscape characteristics include natural systems and features, topography, spatial organization, vegetation, land use, circulation, views and vistas, buildings and structures, and small-scale features that contribute to the historic character of the Battlefield. While historic structures are addressed in the previous

section, impacts to the Battlefield's roads and bridges are addressed here. Cultural landscapes within the affected environment are as follows:

1862 Battlefield Landscape

The entire 3,263-acre area within the legislated boundary of Antietam National Battlefield is listed in the national register for its significance as the scene of one of the major battles of the American Civil War: the Battle of Antietam (also known as the Battle of Sharpsburg). Within this area, the Battlefield preserves and maintains the rural, agricultural character of a collection of farms and farmlands to reflect the historic scene as it was the eve before the Civil War battle on September 17, 1862. This landscape includes eight historic farmsteads that have the potential to be impacted by this Plan: the Joseph Poffenberger, D. R. Miller, Mumma, Roulette, Piper, Newcomer, Sherrick, and Otto farmsteads. These farms are set on the gently rolling landscape that characterizes the entire Battlefield. They include domestic structures, such as farmhouses, as well as agricultural structures such as barns, sheds, and other outbuildings. Farm landscapes include wood fences, stone walls, historic roads, wood lots, and other vegetation that contribute to their historic character. Many maintain planted fields in an effort to continue the historic agricultural setting of the 1862 period of significance.

Antietam National Cemetery

The Antietam National Cemetery cultural landscape encompasses 10 acres in the south part of the Battlefield adjacent to the town of Sharpsburg, as documented in a cultural landscape inventory (2005) and report (2014). The cemetery contains 4,776 Union soldiers and 268 post-Civil War burials. The cemetery is a designed landscape constructed between 1865 and 1867 and includes an open lawn, winding paths, grouped plantings of trees and shrubs, benches, and other elements. The cemetery includes a parking lot area on the north side of Boonsboro Pike (State Route 34) and the Battlefield interpretive tour route as the last stop, presently tour stop 11.

Commemorative Landscape

Antietam National Battlefield's Commemorative Landscape consists of landscape features that were added after the Battle of Antietam. A prominent contributing feature of this landscape is the Battlefield's historic road system (NPS 2009). The Battlefield roads and their adjacent rights-of-way were built by the US War Department to allow visitors to travel through the scenes of the battle and small pockets of land that held monuments. This network of roads was integrated into the Battlefield's interpretive tour route developed by the National Park Service during the Mission 66 period, described below. Many other features, such as tablets, memorials, and monuments placed on the Battlefield, contribute to the Commemorative Landscape, but since they will not be impacted by this Plan they are not described here.

Mission 66 Landscape

The National Park Service built the Mission 66 landscape at Antietam National Battlefield between 1960 and 1967, dramatically transforming the Battlefield from a predominately late 19th and early 20th century commemorative site built under the administration of the War Department to a landscape that incorporated modern visitor services, including improved roads, interactive interpretive exhibits, and a focus on preserving the historic scene of the battle. The Battlefield's Mission 66 landscape includes the "Antietam National Battlefield Tour Route," an 8.5-mile, self-guided driving tour with 11 interpretive tour stops where visitors can pull off the roadway to learn about the most pivotal moments of the battle. Many of the roads on this tour route were built by the War Department in the late 19th century and were reworked during the Mission 66 period to meet the demands of automobile tourists. The new tour route incorporated additional roads into the route, improved existing roads to meet modern safety standards, softened many of the straight alignments of the roads for enhanced scenic views, and rerouted roads to bypass historically sensitive resources. Roadway improvements are generally characterized by parking areas and pulloffs, walkways, and overlook terraces. Included in this Plan are the four-car pulloff at East Woods (tour stop 3), the area near Cornfield (tour stop 4), and a small pulloff at the Mumma Cemetery near the Mumma Farm (tour stop 6). The Rodman Avenue Bridge, also referred to as the Burnside Bridge Road Overpass, is a concrete and steel, two-lane bridge that crosses over the modern Burnside Bridge Road (bypass). The bridge was built in 1965-66 as part of the Mission 66 Battlefield-wide tour road system (NPS 2017b).

Several other contributing Mission 66 landscape features are included in this Plan. The development of the visitor center site in 1963 included the Antietam Remembered Trail (also called the Dunker Church Trail), a paved interpretive trail that leads visitors from the visitor center to Dunker Church. The 64-vehicle parking area in front of the visitor center is also a contributing feature of this area (NPS 2017b). Many other landscape features and structures contribute to the Mission 66 landscape, but because they are not expected to be impacted by the proposed actions of this Plan, they are not described here.

EFFECTS ASSESSMENT

This report assesses effects on cultural resources identified in the preceding sections. The sections below discuss the effects of the adoption of the Visitor Access and Circulation Plan and address anticipated effects of the implementation of the undertaking on the Battlefield's historic structures and cultural landscapes.

HISTORIC STRUCTURES

Recognizing the historic significance and functional use of the visitor center, the proposed undertaking would amend the 1992 Antietam National Battlefield General Management Plan by changing the plan's proposal to remove the visitor center, to instead retain the building and managing it as a historic structure following the guidelines set forth by *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. This planning decision would result in no new actions or changes to the building.

Conclusion. The proposed actions involving historic structures are anticipated to result in *no adverse effect* to historic structures at the Battlefield.

CULTURAL LANDSCAPES

The undertaking's retention of the Mission 66 visitor center and the Battlefield's system of roads would cause no new impacts to cultural landscapes because no changes would be made to the structure or the road system as part of it. The visitor center and roads would continue to be a visual intrusion on the historic setting of the 1862 Battlefield landscape, but they would also continue to be contributing elements of the commemorative landscape and the Mission 66 cultural landscapes.

Altering the Antietam Remembered Trail (Dunker Church Trail) and the walkway leading to the Dunker Church to provide for ABAAS-compliant universal access would result in some changes to the appearance of these relatively narrow trails. This could result in changes in the directional alignment, width, location, and paved materials of these trails. Because these trails are contributing features of the Mission 66 cultural landscape, such changes would be minimized to the greatest degree possible to preserve their historic character. The proposed changes would be designed to ensure that they are not readily visible and would lay well on the landscape to minimize any visual intrusion on the 1862 Battlefield landscape as well. Consultation with the Maryland Historical Trust would occur when the project is designed in order to minimize the potential for adverse effects to the Mission 66 landscape.

Adding tour stop infrastructure along the Battlefield tour road in the areas of the East Woods (tour stop 3), Mumma Farm (tour stop 6), and Cornfield (tour stop 4) would alter the Mission 66-era design of the Battlefield tour road. Bringing the tour stop

infrastructure into compliance with ABAAS may also change some of the Mission 66 features of the existing tour stops, such as the design of the curbs and walkways and the size of parking spaces on an as-needed basis at each tour stop. These additions would introduce small-scale, low-profile nonhistoric elements to these locations. These changes have the potential to cause a small degree of direct and indirect adverse impacts to the Mission 66 cultural landscape. However, any changes would be designed to be consistent with the materials, design, size, and scale of the character-defining features of the Mission 66 infrastructure to minimize their impact on the Mission 66 cultural landscape. The proposed changes could also result in indirect adverse impacts to the 1862 Battlefield landscape due to their potential visibility from open fields and sight lines important to the battle. Although the impacts of these changes have the potential to be adverse, careful design and planning will minimize the magnitude of the impacts to cultural landscapes so that they would not be readily detectable.

The realignment of the comprehensive trail system would involve the construction of 6.0 miles of new trails. These trails would be designed to have a similar look and feel as existing trails. Of these, 5.6 miles of trail would consist of mowed pathways and 0.4 mile would be a groomed dirt trail. The proposed trails would range in width from 18 inches to 24 inches and follow sustainable trail guidelines. New trail segments would be located on the landscape to follow historic patterns, fencelines, farm roads, and other existing features when possible to reinforce these historic patterns, avoid impacts to open fields, and reduce conflicts with the Battlefield's various agricultural leases (see figures 3 and 4).

The addition of 5.6 miles of mowed pathways would be visible up close but not detectable outside the trail's immediate environment, thus minimizing the impact to the vegetation patterns associated with the cultural landscapes in which they would be added. For the new 0.4-mile groomed dirt trail proposed, careful design would minimize the physical and visual impacts caused by the introduction of new trail segments on cultural landscapes. The views to the trails would be screened by the surrounding vegetation on the landscape, such as planted grasses and other leafy vegetation or other existing topographic features on the landscape, such as fencelines, field edges, trees, roads, and other natural features. For the dirt trails, a low-profile design is expected to not be readily visible from moderate or long distances.

The proposed changes to the trail system have the potential to result in indirect and direct adverse impacts to cultural landscapes. Such impacts would be localized in the immediate environment of the new trails. The new trails would not appreciably detract from the appearance of cultural landscape qualities of setting, feeling, and association. The physical aspects of the trail construction and new trail segments would not alter the significant character-defining features of the landscape, such as topographic features, fencelines, planted fields, historic paths, or small features. These approaches to trail design and use would minimize potential adverse effects to the historical integrity of the cultural landscapes where new trails are added.

The removal of approximately 2.6 miles of trails would include the subsequent rehabilitation of those paths, which could include replanting with appropriate vegetation or ceasing to mow where trails are mowed paths. The section of the Cornfield Trail that bisects the historic Cornfield would be removed, allowing for full restoration of this field back into agricultural use that would be more reminiscent of the historic 1862 scene, resulting in direct beneficial impacts to the cultural landscape at this location. The removal of certain trail segments would result in a beneficial impact to the 1862 Battlefield landscape.

Currently, the existing Cornfield Trail (tour stop 4) begins at the North Woods (J. Poffenberger Farm) (tour stop 2) and transects the historic cornfield area. This trail would be relocated to create a new Cornfield Battle Action loop trail that begins and ends at the Cornfield (tour stop 4). The current trail would be removed and its landscape restored to allow the entire area of the historic cornfield to appear more reminiscent of the 1862 Battlefield and its historic scene.

To support development of the perimeter trail, stairs would be installed on the slope near the Otto farmstead. While the introduction of this nonhistoric element has the potential to result in a direct, adverse effect to the Otto Farm, which is part of the 1862 Battlefield cultural landscape, this impact would be minimized using a design that is small in scale and through careful placement on the landscape using vegetation screen so that the stairs are not visible from the historic farmstead. The addition of the stairs is not expected to have a significant, noticeable visual or physical adverse impact on the Otto Farm cultural landscape.

The development of a perimeter trail would use the historic Mission 66 Rodman Avenue bridge that crosses over the modern Burnside Bridge Road. This would require modifications to this bridge structure to make it safe for pedestrian use, such as raising the height of the guardrails or other aspects of the bridge design that contribute to its historic character. Any modifications to the bridge would be developed following the guidelines set forth by *The Secretary of the Interior's Standards for the Treatment of Historic Properties* to minimize the impacts on the bridge's character-defining features, and any changes would be developed in consultation with the Maryland Historical Trust when it is required under the 2008 programmatic agreement. Efforts to minimize such alterations would ensure that potential impacts to the bridge would involve localized, small-scale changes to preserve the bridge's overall appearance and character. As funding becomes available to implement this project further section 106 consultation with Maryland Historical Trust may be undertaken as outlined in the 2008 NPS nationwide programmatic agreement.

Conclusion. The proposed actions of the Visitor Access and Circulation Plan could result in small changes to the 1862 Battlefield, Commemorative, and Mission 66 landscapes. Taken collectively, the National Park Service anticipates that these actions would result in an *adverse effect* to cultural landscapes. As funding becomes available to implement the plan's proposed projects, further section 106 consultation with the Maryland Historical Trust may be undertaken as outlined in the 2008 NPS nationwide programmatic agreement.

EFFECTS ASSESSMENT CONCLUSION

The implementation of individual elements of the Visitor Access and Circulation Plan may have the potential to impact historic properties and/or their contributing features. However, because each element will be implemented in strict accordance with the Plan and the guidance set forth by the Secretary of the Interior's Standards for the Treatment of Historic Properties, and in close consultation with the Maryland Historical Trust – state historic preservation officer (SHPO), these potential impacts will be avoided or minimized. As a result, the National Park Service has determined that the overall implementation of the Visitor Access and Circulation Plan (alternative B) will have no adverse effect on historic properties conditioned on the fact that, as laid out in the 2008 NPS programmatic agreement, each element of the Plan as it is implemented will undergo consultation. As funding becomes available to implement the Plan, each project may be subject to additional section 106 consultation with the Maryland SHPO, as needed, understanding that some projects may be undertaken as outlined in the NPS nationwide 2008 programmatic agreement.

AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

To avoid, minimize, or mitigate adverse effects on historic properties, several steps will be undertaken by the National Park Service during Plan implementation.

For all projects implemented under the Visitor Access and Circulation Plan that may affect historic properties, the National Park Service will proceed with separate section 106 consultations as directed in the NPS nationwide programmatic agreement. All work will be developed to meet *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. If adverse effects cannot be avoided, the National Park Service will consult with the Maryland Historical Trust and other parties to resolve those adverse effects through minimization and mitigation when it is required under the 2008 programmatic agreement. To the extent practicable, the undertaking will avoid direct effects to historic structures, cultural landscapes, and archeological resources. However, the undertaking's purpose of making the Battlefield more accessible to visitors requires some alterations to historic properties. Proposed new trails, tour stops, and interpretive features would be located within the cultural landscapes of the Battlefield. Implementation of these improvements will comply with the Secretary of the Interior's Standards and maintain a low profile to minimize adverse effects on cultural resources. In addition, increased interpretation could be used to mitigate any potential adverse effects of the undertaking.

Cultural landscape inventories and cultural landscape reports would be completed as necessary to inform any alterations to cultural landscapes that may impact contributing features. When planning or undertaking any project that could affect previously documented cultural landscapes, the National Park Service will comply with the treatment recommendations in the relevant cultural landscape reports and incorporate the guidance into the project design. Furthermore, the National Park Service will continue to undertake research and documentation of historic structures, cultural landscapes, and archeological resources at the Battlefield and develop comprehensive guidance for their preservation and treatment (reports could include archeological surveys, historic structure reports, cultural landscape inventories, and cultural landscape reports).

All new construction in the vicinity of historic buildings, structures, or districts will be undertaken according to NPS policy, following the guidelines set forth by *The Secretary of the Interior Standards for the Treatment of Historic Properties*. For example, design that minimizes the visibility of relocated tour stops would reduce the potential for an adverse effect to historic and cultural resources.

Potential for wear and tear due to increased visitor access to some areas of the Battlefield will be mitigated through advanced planning and the monitoring of visitor use management indicators and thresholds. The National Park Service will assess the appropriate level and type of visitation for each resource based on its materials, potential for damage, and using that information to set reasonable limits on visitor

access with its preservation as a primary goal. This approach aligns with existing NPS policy, including the park planning documents, guidance outlined by the Interagency Visitor Use Management Council, and other agency guidance already in place.

The proposed undertaking has been designed to avoid archeological resources on the Battlefield. In areas of the landscape where in situ archeology may occur, such as on lands not previously surveyed for archeology or not disturbed by earlier construction activities, the National Park Service would conduct a phase 1 archeological investigation of the areas planned for ground-disturbing activities associated with this Plan. Any such archeological studies and investigations would be carried out and evaluated for effect before construction and in consultation with the Maryland Historical Trust under the provisions outlined in 36 CFR Part 800, regulations issued by the Advisory Council on Historic Preservation (ACHP) implementing section 106 of the National Historic Preservation Act. Phased implementation activities concerning archeological resources would include the following best management practices:

- Before any ground-disturbing action by the National Park Service, the National Park Service would conduct a phase 1 archeological investigation of the areas planned for construction or other ground-disturbing development, in compliance with the Archaeological Resources Protection Act of 1979 (ARPA) and National Historic Preservation Act. The survey would determine the presence or absence of archeological deposits in the footprint of disturbance. Any NRHP-eligible archeological resources discovered would be evaluated for effect before construction and in consultation with the Maryland Historical Trust. The National Park Service would avoid adverse effects to NRHP-eligible archeological resources discovered during pre-construction survey by changing or shifting activities or by sensitively designing those activities.
- If previously unknown archeological resources were discovered during subsurface ground-disturbing activities, the National Park Service would suspend operations at the site and immediately contact the appropriate NPS archeologist or cultural resource specialist, who would arrange for a determination of eligibility in consultation with the Maryland Historical Trust and, if necessary, would develop a recovery plan.
- In the unlikely event that human remains, funerary objects, or objects of cultural patrimony are discovered during construction activities, applicable provisions of the Native American Graves Protection and Repatriation Act of 1990 (Public Law 101-601) and its implementing regulations would continue to be followed.

REFERENCES

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2017a Cultural Landscape Report – Burnside Bridge Area (Draft).

2017b National Register of Historic Places Nomination – Antietam National Battlefield. Updated 2017.

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APPENDIX A: CONSULTATION LETTERS



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Antietam National Battlefield
P.O. Box 158
Sharpsburg, MD 21782-0158



January 6, 2017

Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
Division of Historical & Cultural Programs
100 Community Place
Crownsville, Maryland 21032

Dear Ms. Hughes:

On November 1, 2016, the National Park Service notified the Maryland Historical Trust of its plans to develop a visitor access and circulation plan and environmental assessment to improve visitor access and experiences at Antietam National Battlefield in Sharpsburg, Maryland. We look forward to discussing the goals and proposed actions of this planning effort in a meeting with your staff on January 18, 2017, to continue our consultation per 36 CFR 800 and Section 106 of the National Historic Preservation Act.

In our upcoming meeting, we would like to hear your feedback about our proposed Area of Potential Effect (APE) and the historic properties potentially affected by the proposed action of the plan. The National Park Service proposes that the APE encompass the area defined by the legislated park boundary authorized for Antietam National Battlefield. This geographic area contains all potential direct and indirect effects, including visual effects, to historic properties.

The conceptual actions proposed by the plan are outlined in our scoping newsletter, attached. We anticipate that the historic properties potentially affected by those proposed actions would be the cultural landscapes and archeological resources within the proposed APE. A list of these properties is attached for the purpose of initiating our discussion, using the attached document "ANTI documented historic properties." We plan to refer to the following three attachments during our meeting:

- ANTI Circulation Plan – Scoping Newsletter – November 2016
- ANTI Proposed APE Map with Historic Properties 1-4-17
- ANTI documented historic properties

We look forward to our discussion with the Maryland Historical Trust on January 18. If you have questions before then, please feel free to contact Jane Custer, our Chief of Resource Management, at 301-432-7893.

Sincerely,

Susan Trail
Superintendent

Enclosures



January 20, 2017

Susan Trail, Superintendent
Antietam National Battlefield
National Park Service
P.O. Box 158
Sharpsburg, Maryland 21782-0158

Re: Area of Potential Effect for Visitor Access and Circulation Plan
Antietam National Battlefield, Washington County, Maryland

Dear Superintendent Trail:

Thank you for your recent letter, dated January 6, 2017, regarding the above-referenced project. The Maryland Historical Trust (Trust), Maryland's State Historic Preservation Office, is reviewing the proposed undertaking to assess its effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. We offer the following comments.

The Trust concurs with the Area of Potential Effect (APE) proposed in your letter. The APE, encompassing the area defined by the legislated park boundary, will contain all direct and indirect effects to historic properties.

We look forward to ongoing consultation with NPS regarding the development of the visitor access and circulation plan and environmental assessment. If you have questions or require further assistance, please contact me (regarding archaeology) 410-514-7631 / beth.cole@maryland.gov or Natalie Loukianoff (regarding historic structures and landscapes) at 410-514-7636 / natalie.loukianoff@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,

Beth Cole
Administrator, Project Review and Compliance

EJC/NSL/201700146

APPENDIX B: REPRESENTATIVE SAMPLE OF EXISTING TOUR STOPS



Dunker Church (tour stop 1). *A red brick terrace extends from the front (east) side of the church and connects to an exposed aggregate sidewalk. Brick stairs lead down from the terrace to Dunker Church Road and the Antietam Remembered Trail. The terrace, stairs, and sidewalk were constructed in 1963 as part of the trail. The sidewalk was extended to the north when the ADA-accessible parking spaces were added (NPS 2017b).*



North Woods (J. Poffenberger Farm) (tour stop 2). *This tour stop is on the north side of Mansfield Avenue with space (roughly 100 ft by 30 ft) for 10 diagonally parked cars (NPS 2017b).*



East Woods (tour stop 3). *The East Woods stop on the tour route is an asphalt-paved pulloff on the north side of Cornfield Avenue near its intersection with Smoketown Road. The pulloff is approximately 125 feet long and allows around four cars to parallel park (NPS 2017b).*



Cornfield (tour stop 4). *The Cornfield parking area and interpretive waysides on the north side of Cornfield Avenue near its intersection with Dunker Church Road. It consists of a roughly rectangular (approximately 120 ft by 30 ft) parking area with spaces for 10 diagonally parked cars (originally designed to fit 12 cars) (NPS 2017b).*



West Woods (tour stop 5). *At Philadelphia Brigade Park, the parking lot consists of three distinct areas located along the west side of a circular road that surrounds the monument. The two parking areas that flank the north and south sides of the road are formed on their east sides by concave edges. Two circular cutouts/planting areas separate the center (west) parking area from the north and south parking areas. Built as part of interpretive improvements to the Philadelphia Brigade Park in 1967, a paved concrete aggregate sidewalk (originally a bituminous greenstone surface) lines the parking area along the north, west, and south sides of the circular drive. (NPS 2017b).*



Mumma Farm (tour stop 6). *In August 1966, the Battlefield constructed a paved pullout on Mumma Lane near the Mumma Cemetery after a temporary sign identifying the cemetery caused numerous drivers to park on the road shoulders (NPS 2017b).*



Bloody Lane (tour stop 8), Observation Tower Parking Area. *The parking area parallels Richardson Avenue and is accessed via an entrance road that curves northeast from the road. It provides diagonal parking for eight cars on the north side and 10 cars on the south. An angled parking space, separated from the rest of the parking area by a grassy median, stands along the west end of the parking area and is reserved for a single bus (NPS 2017b).*

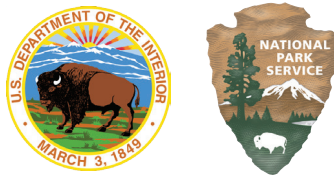


Burnside Bridge, Rifle Pit Overlook (tour stop 9). *The Rifle Pit Overlook, also known in plans as the Upper Terrace, is located below the parking area to the east and accessed via a curved sidewalk from the parking area that follows the topography of the hillside. On the terrace, the wall is approximately 14 inches high on its northern end. The remainder of the wall is approximately 30 inches high. A cut out near the junction of the two walls holds an interpretive wayside panel (NPS 2017b).*



Final Attack (tour stop 10). *The tour stop and pulloff for the Final Attack stands on the east side of Branch Avenue, south of its intersection with Old Burnside Bridge Road and at the intersection of Branch Avenue's new road alignment and the original road alignment (NPS 2017b).*

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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

ANTI 302/143778
March 2018

