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U.S. Department of the Interior

Monocacy National Battlefield
Maryland



General Management Plan
Record of Decision

Approved:

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National Park Service

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

RECORD OF DECISION

GENERAL MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT

Monocacy National Battlefield

Maryland

The Department of the Interior, National Park Service, has prepared this Record of Decision on the *General Management Plan/Final Environmental Statement* for Monocacy National Battlefield. This Record of Decision includes a description of the background of the project, a statement of the decision made, synopses of other alternatives considered, the basis for the decision, findings on impairment of national battlefield resources and values, a description of the environmentally preferable alternative, a listing of measures to minimize environmental harm, and an overview of public and agency involvement in the decision-making process.

BACKGROUND OF THE PROJECT

The purpose of the general management plan is to provide a comprehensive direction for resource preservation and visitor use and a basic foundation for decision making for the national battlefield for the next 15-20 years. The plan prescribes the resource conditions and visitor experiences that are to be achieved and maintained in the national battlefield over time. The clarification of what must be achieved according to law and policy is based on review of the national battlefield's purpose, significance, and special mandates.

DECISION (SELECTED ACTION)

Description of the Selected Action

The decision is to select alternative 4, the National Park Service preferred alternative, for implementation. Elements of the selected alternative are presented below.

All historic structures will be preserved and maintained, and the historic farmlands will continue to be leased to retain their use in agriculture. The outbuildings on the Best Farm will remain open. The Worthington House will be rehabilitated inside and be open to visitors with exhibits. National Battlefield administration will be moved into the rehabilitated Thomas House. The stone tenant house on the Thomas Farm will contain exhibits and restrooms. National Battlefield

maintenance will continue to operate from its current location in a nonhistoric structure near the Gambrill Mill and be redesigned to meet the needs for offices, vehicle storage, and work space.

Three nonhistoric structures will be removed from the landscape. Two structures are houses constructed of cinder blocks. The third is a historic toll house that was moved to the site from its original location. It is in severely deteriorated condition, lacks integrity, and its close proximity to the intersection of Araby Church Road and Maryland Highway 355 makes it a safety concern.

The entrance to the 14th New Jersey Monument will be shifted south to allow better sight distances entering and exiting Maryland Highway 355. An existing informal parking area on the east side of Maryland Highway 355 used by fishermen will be closed and the area relandscaped. River access will continue from the 14th New Jersey Monument parking area. A landscaped commemorative area will be created at the site of the Pennsylvania and Vermont Monuments as a location for any new memorials that might be added to the national battlefield in the future.

Visitors will use their own vehicles to drive around the battlefield using existing roadways (Baker Valley Road, Araby Church Road, and Maryland Highway 355). The possibility of a pedestrian deck spanning Interstate 270 (I-270) is being evaluated in consultation with the Maryland Department of Transportation (MDOT) as mitigation for proposed MDOT widening of I-270 through the national battlefield. If the deck proves feasible and if an agreement can be worked out, it will provide a trail spanning I-270 that connects the Worthington and Thomas farms.

A new trail extension of the Gambrill Mill Trail will enable visitors to walk to the railroad junction and on to the sites of the Union entrenchments and Wallace's headquarters, all important interpretive locations within the national battlefield.

Upgraded interpretation using new signs, wayside markers, and brochures will be developed.

Natural resource areas along rivers and drainages and along the heights behind the Worthington House will remain undeveloped and protected.

Boundary Expansion

The plan does not propose acquisition of any lands outside the authorized boundary.

Mitigating Measures/Monitoring

Historic Structures

All structures within the national battlefield will be treated as eligible for inclusion on the National Register of Historic Places until officially determined otherwise. All proposed treatments and uses of historic structures will be undertaken in accordance with the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*, and the National Park Service *Director's Order-28, the Cultural Resources Management Guideline*. All proposed work on historic structures will require prior consultation with the Maryland State Historic Preservation Officer.

Cultural Landscapes

All cultural landscapes within the national battlefield will be evaluated for inclusion on the National Register of Historic Places. The appropriate level of preservation for each landscape will be determined in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*.

Archeological Resources

A program of survey, identification, and evaluation of archeological resources will be developed and initiated. Eligible sites will be nominated to the National Register of Historic Places. The condition of known sites will be periodically monitored and assessed in order to better preserve them. The state historic preservation officer will be consulted to determine the best means of conducting data recovery when needed and preservation/protection measures to be implemented during ground disturbance activities.

Museum Objects

The guidelines in the National Park Service *Museum Handbook* will be followed with regard to inventory, cataloging, exhibition, and storage.

Exotic Species

An inventory of plants and animals will be completed and a program for reversing the destructive effects of exotic species developed. Native plant species in non-agricultural areas will be managed. Exotic species, where feasible and desirable, will be controlled or eliminated. Interpretive/educational outreach to visitors and neighbors will be provided to explain the purpose and need for exotic species management.

Floodplains

A flood awareness, preparedness, and warning system will be developed to evacuate the Gambrill Mill during flooding and to warn visitors of flooded areas of the park.

Integrated Pest Management

Pesticide use will be coordinated with CSX Railroad within park boundaries. The use of pesticides by lessees will be monitored to protect streams, rivers, and other riparian areas.

Natural Sounds

Tour bus companies will be required to comply with noise reduction regulations. The level of noise output will be a consideration when procuring and using equipment.

Threatened and Endangered Species

Federal, state, and locally listed T & E species will be inventoried, monitored, and managed. Research that contributes to knowledge of these species will be encouraged. Sensitive habitats will be maintained and enhanced, and management plans will be modified to be more effective.

Water Resources

Water resources on the battlefield will be monitored and best management practices implemented for pollution generating activities and facilities. The use of pesticides and fertilizers will be minimized on croplands. The national battlefield will work with other program partners to manage the Chesapeake Bay Watershed as a cohesive ecosystem, and work toward restoration, conservation, and interpretation of the bay's resources.

Wetlands

Battlefield wetlands will be inventoried and sufficient buffer width established to reduce sediment loads entering the Monocacy River and its tributaries. River banks will be stabilized and degraded sections of streams and wetlands restored within the national battlefield.

Transportation

The national battlefield will work with the MDOT to minimize the impact of road and alternative transportation work proposed on Interstate 270 and Maryland Highway 355 on the national battlefield in order to minimize damage to natural resources and any visual impact resulting from construction.

OTHER ALTERNATIVES CONSIDERED

In addition to the selected alternative, three alternatives were analyzed and considered.

Alternative 1, the "no action" alternative, would continue current management of the national battlefield including efforts to preserve and maintain all cultural and natural resources to National Park Service standards. Visitor services would be available only at the visitor center. Historic farmlands would continue to be leased to maintain their appearance.

Alternative 2 would move all administrative and maintenance functions out of the park into leased space in the local community. An alternative transportation system would provide safe access to most interpretive locations. All historic structures would be preserved and maintained, and the historic farmlands would be leased to retain their agricultural appearance.

The Thomas House would be leased out under the National Park Service historic leasing program. New trails would be constructed to enable visitors to reach the railroad junction from the visitor center and to visit the sites of the Union entrenchments and Major General Lew Wallace's headquarters from Gambrill Mill. The maintenance facility at the Gambrill Mill would be removed and the site re-landscaped.

To improve sight distances for safe access and egress from the 14th New Jersey Monument, the entrance would be shifted south. A landscaped commemorative area would be created at the site of the Pennsylvania and Vermont Monuments as a location for any new memorials that might be added to the national battlefield in the future.

A new parking area would be constructed closer to the Worthington House to replace a temporary parking area now in use. The stone tenant house at the Thomas farm would contain exhibits. There would be restrooms and parking at a non-historic outbuilding.

Alternative 3 would move administration into the Thomas House. The existing maintenance facility at Gambrill Mill would be expanded. Visitors would use their own vehicles to drive around the battlefield. As in alternatives 1 and 2, all historic structures would be preserved and maintained, and the historic farmlands would continue to be leased to keep them agricultural. The first floors of the Best and Worthington Houses would contain exhibits supplementing those at the visitor center.

The parking area at the 14th New Jersey Monument would be removed and relocated across Maryland Highway 355. A landscaped commemorative area would be created at the site of the Pennsylvania and Vermont Monuments but no new memorials would be added anywhere in the national battlefield.

An automobile deck would be constructed over Interstate 270 connecting the Worthington and Thomas farmsteads visually and physically. It would be constructed in such a way as to appear to be continuous farmscape.

BASIS FOR DECISION

Three actions were key in the decision to make alternative 4 the selected alternative over alternative 2, the environmentally preferable alternative.

First, removal of both the maintenance and administrative functions from the park into rental space in nearby Frederick in alternative 2 would have allowed the removal of the existing metal maintenance structure from the battlefield landscape and the commercial leasing of the Thomas House. However, both functions would have increased the amount of driving by park staff using busy Maryland Highway 355 and unduly separated park staff from the resources managed and interpreted. It would also have placed a commercial use within the heart of the national battlefield (the lease of the Thomas House). Both alternatives 3 and 4 kept both functions within the park.

Second, an alternative transportation system in alternative 2 would have decreased visitor driving within the park, made visitor access to park areas safer by obviating the use of busy Maryland Highway 355, and decreased the size of parking areas at each site. This system weighed heavily in the selection of alternative 2 as the environmentally preferable alternative. However, the visitation presently does not make such a system financially feasible as a commercial operation and there is no guarantee that such a system would be financially feasible in the future. Both alternatives 3 and 4 utilize personal vehicles to access the park.

Third, alternatives 2 and 4 include a connection of the Thomas and Worthington farms via a deck over Interstate 270, while alternative 3 does not. A connection of the two farms is an important interpretive tool allowing visitors and park staff to easily move back and forth between the two properties.

As a result, the decision to select alternative 4 over the environmentally preferred alternative 2 was made 1) to better connect park staff to the resource, 2) to more fully consider the financial feasibility of alternative transportation at this time, and 3) to ensure the connection of the Thomas and Worthington farms both physically and interpretively.

FINDINGS OF IMPAIRMENT OF PARK RESOURCES AND VALUES

Impairment occurs when, in the professional judgment of the responsible National Park Service manager, harm to the integrity of park resources or values (including opportunities for enjoyment of those resources or values) results from the proposed action. Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.

Impact topics analyzed in detail were Historic Buildings and Structures, Cultural Landscapes, Visitor Use and Experience, Socioeconomic Environment, Access and Circulation, and NPS Operations and Facilities.

Stabilizing and preserving unused historic buildings will slow the natural deterioration processes substantially, resulting in no adverse effects under the selected alternative. Removing nonhistoric structures will restore the historic landscape to its historic condition. Adaptively reusing the Thomas and Worthington Houses, the Thomas stone tenant house, and the Gambrill Mill for interpretation or for national battlefield operations will not result in adverse effects.

Implementation of the selected alternative will result in long-term and beneficial impacts to visitor orientation. On visitor safety, the impact would be moderate, long-term and adverse. On interpretation the impact will be long term and beneficial. Overall, the impact to visitor use and experience will be long-term and beneficial.

Implementation of the selected alternative will result in long-term beneficial impacts on the socioeconomic environment.

There will be long-term minor adverse impacts on Maryland Highway 355 and moderate long-term adverse impacts on the Araby Church and Baker Valley Roads networks from increased traffic caused by greater numbers of visitors. However, the access and circulation improvements throughout the battlefield will result in long-term beneficial impacts on pedestrian and vehicular access and circulation to features throughout the battlefield.

There would be a long-term beneficial impact on the national battlefield's operations from consolidation of management in the Thomas House and redesign of the maintenance facility.

Because there would be no major adverse effects on resources or values whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of Monocacy National Battlefield, (2) key to its natural or cultural integrity or opportunities for its enjoyment, or (3) identified as a goal in its General Management Plan or other relevant National Park Service planning documents, the national battlefield's resources or values will not be impaired.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

Environmentally preferable is defined as "the alternative that will promote the national environmental policy as expressed in section 101 of the National Environmental Policy Act of 1969." Section 101 states that it is the continuing responsibility of the Federal Government to

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choices;
5. Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The environmentally preferable alternative for Monocacy National Battlefield is alternative 2 in this plan. Rationale for this conclusion is presented below.

Alternative 2 meets the second criteria best because it provides the greatest degree of safety, including an alternative transportation system that transports visitors, worry-free, around the national battlefield. It also includes a vehicular deck that allows visitors to pass from the Worthington to the Thomas farms by bus or car without having to back track onto busy Baker Valley Road. All of the alternatives meet the healthful, productive, and aesthetically pleasing criteria but alternative 2 provides an opportunity to use the deck to mask the visual and audible impacts of Interstate 270 while restoring the views between the Worthington and Thomas farms by strategic placement of crops and hedgerows on the deck.

Criteria 3 is best met by alternative 2 as it provides the most new trails into previously inaccessible areas and because the proposed deck provides a way to turn a visual disadvantage (Interstate 270) into an advantage. Construction of the deck over Interstate 270, an element of alternatives 2 and 4, would cause the most environmental disruption of all alternatives with tree removal and some access road construction. However, these would occur in already disturbed areas along the Interstate 270 right-of-way, and adverse impacts would be minor.

Criteria 4 is met by all alternatives as they all preserve natural and cultural resources of significance for future generations and provide a variety of individual visitor choices for the use of national battlefield resources, both cultural and natural.

Alternatives 2 and 4 utilize depletable resources in the construction of either a vehicle or pedestrian deck across Interstate 270. Alternative 2 uses nonrenewable fuel in the alternative transportation system but could actually save fuel if enough visitors use it rather

than personal vehicles. All alternatives will utilize depletable resources in the preservation of historic structures. Alternatives 3 and 4 both make use of existing structures for office and maintenance space. However, alternative 3 utilizes the Best House interior for exhibit space while alternative 4 stabilizes the interior but does not make it useable space. The Best House is in the most critical condition of any of the battlefield structures and any work required to make it usable would result in the loss of deteriorated original fabric. Therefore, any differences between alternatives 3 and 4 would be barely detectable.

Alternative 2 is the environmentally preferable alternative. It preserves all cultural resources, provides an additional level of visitor safety, and improves access and circulation. Although it causes a relatively minor environmental disturbance by removing trees and other vegetation along Interstate 270 that area is already greatly disturbed by the construction of Interstate 270.

Alternatives 3 and 4 do not present the same high level of benefit to the visitor experience that alternative 2 does. Access and circulation are not as safe as alternative 2 and the benefit to the cultural landscape is not as high as with alternative 2.

Although alternative 2 was determined to be the environmentally preferable alternative, it was not selected for implementation. The current projections for visitation to the national battlefield do not indicate that a transportation system, an element of alternative 2, would be feasible within the near future, if ever. Without the transportation system, the design of a deck would be less costly as it would have to be designed to bear less weight and negate the safety aspects identified for alternative 2. These factors all support the NPS decision to select alternative 4 for implementation.

PUBLIC AND AGENCY INVOLVEMENT

The notice of intent to prepare this Environmental Impact Statement was published in the *Federal Register* September 23, 2002 (FR vol. 67, no. 184, p. 59539).

Public meetings and newsletters kept the public informed and involved in the planning process for Monocacy National Battlefield. The National Park Service compiled a mailing list that consisted of interested citizens, legislators, businesses, local governments, members of organizations, and various government agencies. The first newsletter, issued in December 2002 described the planning effort. The National Park Service received less than 30 responses to the first newsletter.

The National Park Service conducted public scoping meetings on July 29 and 31, 2002, in the Gambrill House, Monocacy National Battlefield. A total of 16 people attended the two meetings. Only 6 people attended

another scoping meeting at the same location in December 2002 (inclement weather).

The National Park Service met with the Maryland State Highway Administration and the Frederick County Commissioners on July 31, 2002. Letters were sent to the U.S. Fish and Wildlife Service requesting data under section 7 of the Endangered Species Act. Consultation with the Maryland Department of Natural Resources resulted in a list of state species of concern. The Natural Resources Conservation Service was consulted and a determination was made that Monocacy National Battlefield does not contain any prime or unique farmlands.

The superintendent and the project manager met with a representative of the Maryland State Historic Preservation Office on August 1, 2002, at the national battlefield and again in June 2003 at the State Historic Preservation Office in Crownsville, Maryland, to discuss the progress of the alternatives of the General Management Plan and the strategy for dealing with the proposal to widen Interstate 270.

The National Park Service again received less than 30 written responses to the newsletter and comments at all the meetings. All the comments received were considered and incorporated into the appropriate issues for the plan.

A second newsletter distributed in April 2003 described the draft alternative concepts for managing the national battlefield. A total of 36 electronic and mailed comments were received in response to that newsletter. The comments gave positive feedback on the planning process and the alternatives presented. Many commenters expressed appreciation for the opportunity to comment and take part in the planning process.

The *Draft General Management Plan/Environmental Impact Statement* was placed on public review during September and October 2008. About 350 copies of the plan were mailed to agencies, organizations, and the national battlefield mailing list. In addition, the availability of the document and information about public meetings were announced in the local newspaper. Two public meetings were held at the national battlefield on September 24 from 3 p.m. to 5 p.m. and again from 6 p.m. to 8 p.m. A total of three members of the public attended the two meetings. The "Notice of Availability" was published in the *Federal Register* on May 1, 2009. Therefore, a letter was sent to all recipients of the original mailing apprising them that the official review period would be May 2 to July 1, 2009. A day-long public open house was held at the visitor center on June 4, 2009. No written comments were received at that time.

Approximately 18 written and electronic comments were received during the review beginning in September 2008 and continuing until July 1, 2009. The public did not present any new alternatives, and public

comment analysis did not result in any substantive modifications to the current alternatives.

The public's comments have been considered by the National Park Service in preparing this *Abbreviated Final General Management Plan/Environmental Impact Statement*, consistent with the requirements of 40 CFR 1503.

The U.S. Environmental Protection Agency did not endorse an alternative. They did rate the document L.O. or Lack of Objection.

The Maryland Department of Planning, Maryland Historical Trust supported the preferred alternative and noted that it looked forward to assisting with the implementation of the plan.

The Frederick County Division of Planning concurred with the selection of alternative 4 as the preferred alternative but provided comments consisting of correction of errors and suggestions for improving the alternatives.

The Civil War Preservation Trust concurred with the selection of alternative 4 as the preferred alternative and provided no additional suggestions for changing the alternative.

The Friends of Antietam and the Monocacy concurred with the preferred alternative but indicated concern about the safety of a deck over Interstate 270.

The Monocacy Scenic River Advisory Board did not endorse any alternative but provided suggestions for additional access to the Monocacy River.

AMERICAN INDIAN CONSULTATION

No American Indian consultation was determined necessary by the National Capital Regional Office. No American Indian tribes were identified with affiliations to Monocacy National Battlefield.

CONCLUSION

As described above, all practical means to avoid or minimize environmental harm from the selected alternative have been adopted. Because there will be no major adverse impacts to resources whose conservation is (1) necessary to fulfill specific purposes in the establishing legislation or proclamation for Monocacy National Battlefield; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as a goal in relevant National Park Service planning documents, there will be no impairment of the park's resources or values. After a review of these effects, the alternative selected for implementation will not impair park resources or values and will not violate the National Park Service Organic Act.