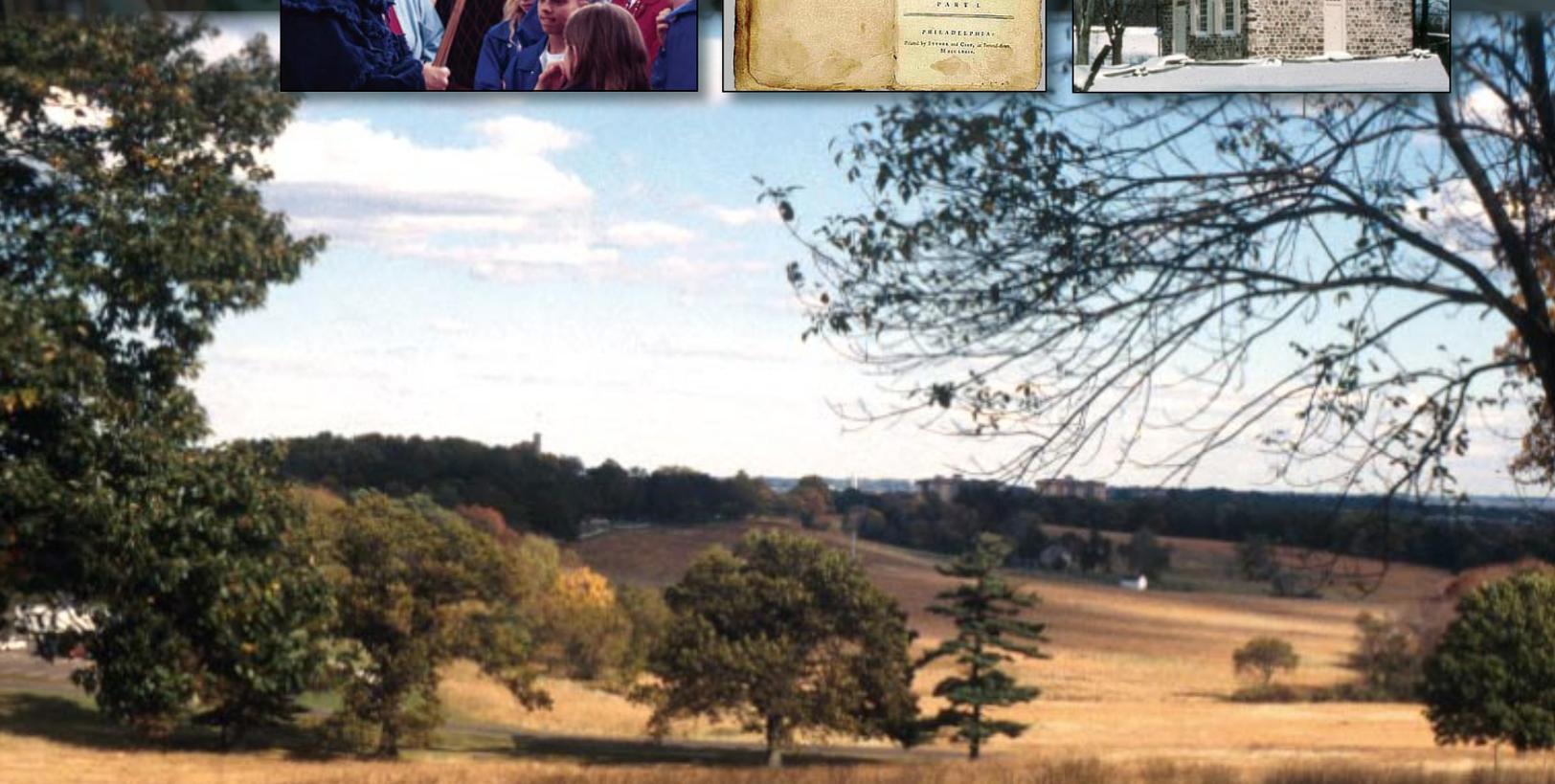
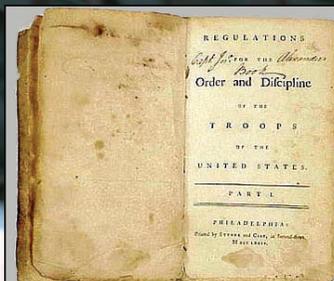




July 2007

Valley Forge National Historical Park



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

July 2007

This *Abbreviated Final General Management Plan/Environmental Impact Statement* (GMP/EIS) for Valley Forge National Historical Park (NHP) responds to and incorporates the public and agency comments received on the *Draft GMP/EIS*. An abbreviated final GMP/EIS is used because the comments received require only minor responses and editorial changes to the *Draft GMP/EIS*. No changes have been made to the alternatives or to the impact analysis presented in the *Draft GMP/EIS*. Therefore, Alternative C remains as the NPS Preferred Alternative.

The *Draft GMP/EIS* was available for public and agency review from November 3, 2006 through April 10, 2007. The *Draft GMP/EIS* presented and evaluated three alternatives for the future management of Valley Forge National Historical Park (NHP). Alternative A, the No-Action Alternative, assumes continuation of current policies and associated actions. It retains the management direction of the 1982 GMP and reflects current conditions. Some initiatives already underway, such as rehabilitation of the Valley Forge Train Station by the National Park Service (NPS) and construction of the River Crossing Complex by the Pennsylvania Department of Transportation (PennDOT), are reflected in this alternative. The action alternatives, B and C, would enhance the management and preservation of the park's cultural and natural resources, while providing new opportunities for visitors. Alternative B would provide an exciting palette of new options for visitors to tailor visits and experiences to best meet their own needs and interests. Experiences would focus on exploration and self-discovery of the full cultural and natural history of Valley Forge. Excellent orientation, as well as the use of new technologies, would be the key to this approach. Alternative C (the NPS Preferred Alternative) would provide visitors the opportunity to decide the kind of experience they want, depending on learning style, interest, and time. The park would provide a core message and experience for all visitors that are primarily immersive and focus on the encampment and the American Revolution. A self-discovery approach would illustrate additional areas of the park, as well as historical and natural resource themes and topics.

Environmental impacts that would result from implementation of the alternatives were discussed in detail in the *Draft GMP/EIS*. Impact topics included: cultural resources, physical and natural resources, visitor use and experience, socioeconomic environment, transportation and site access, and park operations and facilities.

This *Abbreviated Final GMP/EIS* is comprised of the NPS' responses to public comments, errata detailing typographic editorial changes to the *Draft GMP/EIS*, and copies of agency and substantive comment letters. The public release of this *Abbreviated Final GMP/EIS* will be followed by a 30-day no-action period, after which a Record of Decision (ROD) will be prepared to document the selected alternative and set forth any stipulations for implementation of the GMP. This *Abbreviated Final GMP/EIS* and the *Draft GMP/EIS* constitute the complete and final documentation upon which the ROD will be based.

For further information regarding this document, please contact Deirdre Gibson, Chief of Planning and Resource Management for Valley Forge NHP, at Valley Forge National Historical Park, 1400 Outer Line Drive, King of Prussia, PA 19406, or email deirdre_gibson@nps.gov.

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Acronyms

ACHP	Advisory Council on Historic Preservation
FHWA	Federal Highway Administration
FTE	Full-time equivalent
GMP/EIS	General Management Plan/Environmental Impact Statement
NEPA	National Environmental Policy Act
NHP	National Historical Park
NPS	National Park Service
PA	Programmatic Agreement
PennDOT	Pennsylvania Department of Transportation
ROD	Record of Decision
SHPO	State Historic Preservation Officer

Abbreviated Final General Management Plan and Environmental Impact Statement Valley Forge National Historical Park

Foreword

The *Draft General Management Plan/Environmental Impact Statement (GMP/EIS) for Valley Forge National Historical Park (NHP)* was available for public and agency review from November 3, 2006 through April 10, 2007. Copies of the document were sent to individuals, agencies, organizations, and local libraries as listed in Section 5.7.2 of the document. The document was also made available for review at the park and on the National Park Service (NPS) Planning, Environment, and Public Comment website (<http://parkplanning.nps.gov>). Public meetings were held on February 21 and 22, 2007. Eight presentations of the plan were made to civic and interest groups and local governments. Press releases and public notices were used to announce the availability of the document, as well as the public meeting dates and times. A total of 379 commenters provided 708 comments on the *Draft GMP/EIS*.

This *Abbreviated Final GMP/EIS* responds to and incorporates the public and agency comments received on the *Draft GMP/EIS*. An abbreviated final GMP/EIS is used because the comments received require only minor responses and editorial changes to the *Draft GMP/EIS*. NPS Director's Order 12 Handbook, Section 4.6(D) defines minor as "making factual corrections, or explaining why comments do not warrant further agency response." No changes have been made to the alternatives or to the impact analysis presented in the *Draft GMP/EIS* as a result of public comments.

This *Abbreviated Final GMP/EIS* is comprised of the NPS' responses to public comments, errata detailing editorial changes to the *Draft GMP/EIS*, and copies of agency and substantive comment letters. The public release of this *Abbreviated Final GMP/EIS* will be followed by a 30-day no-action period, after which a Record of Decision (ROD) will be prepared to document the selected alternative and set forth any stipulations for implementation of the GMP. This *Abbreviated Final GMP/EIS* and the *Draft GMP/EIS* will constitute the complete and final documentation upon which the ROD will be based. The ROD also will include the finalized, executed Programmatic Agreement (PA) for compliance with Section 106 of the National Historic Preservation Act.

Response to Agency and Public Comments

As noted above, 379 commenters provided 708 comments on the *Draft GMP/EIS*. These comments were categorized as substantive or non-substantive as required by the Council on Environmental Quality guidelines. NPS Director's Order 12 Handbook, Section 4.6(A) defines substantive comments "as those that do one or more of the following:

- question, with reasonable basis, the accuracy of information in the EIS.
- question, with reasonable basis, the adequacy of environmental analysis.
- present reasonable alternatives other than those presented in the EIS.
- cause changes or revisions in the proposal.

In other words, they raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive." As required, responses are provided for all substantive comments. Responses also are provided for non-substantive comments that require a clarification of NPS policy or the contents of the *Draft GMP/EIS*

Substantive Comments

Tables 1 and 2 note and respond to each substantive comment that was received from the public and agencies on the *Draft GMP/EIS*. The correspondence for each of these comments is reprinted in full (see Appendix C).

Table 1: Responses to Substantive Agency Comments

Topic	Comment ¹	Response
Historic structure demolition	While we support Alternative C, the Park's preferred alternative, in terms of buildings, landscape features, and archaeology resources, we are concerned with the proposed demolitions of fifteen buildings. According to the list in Appendix A of the Contextual Documentation and Cultural Landscape Plan, most of these buildings are contributing resources.	<p>All contributing structures were physically surveyed and described during the List of Classified Structures Field Inventory. Mitigation for demolition of contributing structures will include the following:</p> <ul style="list-style-type: none"> ■ Scaled, face-on photographs of each façade of the structure ■ Forwarding of a set of the photographs to the Pennsylvania State Historic Preservation Officer (SHPO) <p>See Appendix A: Errata (errata 7, 8, and 9) for specific changes to the <i>Draft GMP/EIS</i> text and Appendix B for the PA revisions.</p>

¹ No grammatical or editorial changes have been made to the comments. They are presented as written by the commenter.

Table 1: Responses to Substantive Agency Comments (continued)

Topic	Comment	Response
Historic structure demolition and rehabilitation	We have reviewed the draft Programmatic Agreement and generally concur with the stipulations. However, we have one concern. There is no process outlined when a project results in an adverse effect finding, such as the demolition of a building or when rehabilitation cannot meet the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitation of Historic Buildings. This can be accomplished by outlining procedures in 36 CFR Part 800.6 in the agreement.	<p>All contributing structures were physically surveyed and described during the List of Classified Structures Field Inventory. Mitigation for demolition of contributing structures will include the following:</p> <ul style="list-style-type: none"> ▪ Scaled, face-on photographs of each façade of the structure ▪ Forwarding of a set of the photographs to the Pennsylvania SHPO <p>See Appendix A: Errata (errata 7, 8, and 9) for specific changes to the <i>Draft GMP/EIS</i> text and Appendix B for the PA revisions.</p> <p>As noted in the revisions to the PA (page 8 of revised PA), "For any undertaking listed above [including rehabilitation that cannot meet the Secretary of the Interior's Standards] for which an adverse effect is predicted, NPS and the SHPO should come to a letter agreement on suitable mitigation. In some cases, at the request of either the NPS or the SHPO, formal Section 106 consultation under 36 CFR 800.6 would be instituted."</p>
Historic structure demolition and archeological investigations	We would ask the park to consider clarifying the language in the draft PA under stipulation IV.B.2., "Park Specific Stipulations-Consultation Requirements," to specify which historic buildings will be demolished and which archaeological investigations will be conducted without ACHP, or at times, State Historic Preservation Officer (SHPO) review pursuant to this PA. We believe the clarification is necessary to prevent the inability of the SHPO and/or the ACHP to comment on any future potentially similar undertakings not currently envisioned in this agreement.	Revisions to the PA are outlined in Appendix B. Stipulation IV.B.2. has been revised, as suggested (see pages 5-6 of revised PA), to clarify those actions that will and will not require further SHPO and/or Advisory Council on Historic Preservation (ACHP) review.

Table 1: Responses to Substantive Agency Comments (continued)

Topic	Comment	Response
American Revolution Center (ARC) museum impacts	<p>American Revolution Center: The plan describes the current status of the relationship between the American Revolution Center and the National Park Service. At present there is no formal agreement between the parties and the general management plan does not address the potential impact of the American Revolution Center museum at its proposed new location. Montgomery County supports the American Revolution Center and recognizes that it will be a very important addition to the Valley Forge area visitor experience.</p>	<p>The plan includes the potential for the museum at a site within the park that had been mutually identified by the NPS and the ARC. Potential impacts of the structure at this site were not documented in the <i>Draft GMP/EIS</i>, however, because at the time the <i>Draft GMP/EIS</i> was published, no formal agreement existed between the NPS and the ARC. Subsequent to publication, the ARC identified a site that is within the legislative boundary of Valley Forge NHP but privately owned. No planning details are available that would allow a reasonable assessment of potential impacts. As the ARC project proceeds through the planning and zoning review of Lower Providence Township, NPS will participate as an interested party and adjacent land owner. ARC will be responsible for all required planning and compliance necessary to assess the potential impacts to park resources and values as well as impacts to the region.</p>
Historic viewsheds	<p>[Rehabilitation of the interpretive focus areas and re-establishment of some vistas] The FEIS should specify where the forest removal will take place indicating the age and type of trees removed as well as noting any impact to encampment-period trees, state champion and/or historic trees. In addition to providing the present composition of the area, the FEIS should discuss if habitat loss has been accounted for with particular attention to impacts on sensitive species.</p>	<p>The locations of historic views to be re-established are noted on page 2-42 in the <i>Draft GMP/EIS</i>. The impacts of viewshed clearing on vegetation are described on page 4-50, while the impacts of viewshed clearing on wildlife and habitat are described on page 4-55. At most, views among Redoubts 1, 2, 3, 4, the Star Fort, and Stony Battery would be re-established. Trees to be removed include oaks and tulip trees that were planted or seeded in the early 20th century and pines that were planted in the 1960s. No state champion trees, historic trees, or sensitive species (floral or faunal) are located within the areas to be cleared; therefore, there would be no impacts to such vegetation or wildlife. The process for viewshed restoration would include the removal of trees and shrub vegetation, where necessary. Each area would be seeded with native grasses and regularly mowed to maintain open views.</p>

Table 1: Responses to Substantive Agency Comments (continued)

Topic	Comment	Response
		The <i>Draft GMP/EIS</i> has been revised to further clarify the potential impacts. See Appendix A: Errata (errata 15 and 16) for specific changes.
Dam removal	As noted on page 4-42 "Several failing dams within the park would also be removed." It is also stated that "By eliminating these additional man-made structures from within the floodplain, natural hydrologic flows should return and sedimentation build up would be minimized, a long-term, moderate, beneficial impact." The DEIS did not specify the location of the dams to be removed, namely Valley Creek, Meyer's Run, Colonial Springs, and Fatlands dam (Page 4-38). Additionally, the FEIS should address the potential impact that this action may have on water quality and the potential to disrupt contaminated soils within the stream that may result from a change in hydrologic flow, particularly within Valley Creek.	As stated in the <i>Draft GMP/EIS</i> , page 1-35, a GMP/EIS is a programmatic level of planning that is not meant to assess the site-specific impacts of individual projects. Therefore, the potential impacts of dam removal are presented qualitatively, from a programmatic perspective. The <i>Draft GMP/EIS</i> proposes removal of several failing dams within the park. Dams on Meyer's Run, Fisher's Run, and Valley Creek are mentioned specifically and depicted on Figure 3-4. Prior to removal of these dams, further site-specific study and any required compliance would be completed. Additional text has been provided in Appendix A: Errata (erratum 10) to note which dams would be considered for removal.
Faunal passages	The FEIS should discuss fish, herpetological, and mammal passages, where appropriate	As stated in the <i>Draft GMP/EIS</i> , page 1-35, a GMP/EIS is a programmatic level of planning that is not meant to assess the site-specific impacts of individual projects. Prior to implementing any of the actions proposed by the <i>Draft GMP/EIS</i> , additional site-specific studies and any required compliance would be completed to address the specific impacts. Where appropriate, this will include discussion of fish, herpetological, and mammal passages.

Table 1: Responses to Substantive Agency Comments (continued)

Topic	Comment	Response
Water resources impacts	EPA would like the FEIS to assess the impacts to these waters and sediments related to the two proposed bridges; including the upgrade and widening of the existing US 422 bridge since the Betzwood Bridge replacement and the widening of US 422 bridge across the Schuylkill River and its associated floodplain. (Page 4-41)	The U.S. 422 bridge projects are actions by the Pennsylvania Department of Transportation (PennDOT) in cooperation with the Federal Highway Administration (FHWA) and are not NPS projects. The <i>Draft GMP/EIS</i> discusses potential impacts of these projects as part of the assessment of cumulative impacts. Cumulative impacts to water resources are discussed on pages 4-36, 4-41, and 4-44. The impacts of these projects were evaluated in a separate National Environmental Policy Act (NEPA) analysis prepared by PennDOT in cooperation with the FHWA and were incorporated by reference into the cumulative impact analysis in the <i>Draft GMP/EIS</i> .
Wetland impacts	Page 4-45, "All the action alternatives propose construction of pedestrian/bicycle crossings of the Schuylkill River and Valley Creek. Depending on the north side location for the Schuylkill River crossing, there could be a long-term, minor, adverse impact from a new bridge pier." What would be the approximate area of wetlands impact and what kinds of wetlands have the potential to be impacted? In addition, the small wetland within the Grand Parade should be delineated and size indicated.	<p>As stated on page 1-35 of the <i>Draft GMP/EIS</i>, the level of planning involved in the <i>Draft GMP/EIS</i> is programmatic and is not meant to assess the specific impacts of individual projects. Prior to design and construction of the proposed pedestrian/bicycle crossing of the Schuylkill River, site-specific studies and any required compliance would be completed, including detailed analysis in an appropriate NEPA document and obtaining any required permits.</p> <p>It is probable that the small wetland within the Grand Parade may be impacted as a result of the asbestos remediation project. The wetland will be delineated and verified by the Army Corps of Engineers prior to design and implementation of the proposed actions within the Grand Parade.</p> <p>Text has been added to the <i>Draft GMP/EIS</i> to further clarify these points. See Appendix A: Errata (errata 11, 12, 13, and 14) for details.</p>

Table 1: Responses to Substantive Agency Comments (continued)

Topic	Comment	Response
Wetland impacts	<p>National Wetlands Inventory maps indicate that palustrine emergent and palustrine forested wetlands occur within the boundaries of the proposed project. Although NWI maps were prepared using aerial photography, and are therefore not always completely accurate, the Soil Survey for Montgomery and Chester Counties also indicate that wetlands are likely to occur there.... Any final determination of whether wetlands are present on the proposed project site should include a site visit by a qualified individual trained in wetland identification. Furthermore, the proposed project area includes perennial streams. We recommend that you avoid, and minimize unavoidable impacts to, aquatic resources when carrying out any planning and construction work under this management plan.</p>	<p>Prior to any construction, site-specific studies would be completed, including identification and delineation of wetlands and waterways by a qualified professional. If a wetland area or waterway will be impacted, all required compliance will be completed, such as developing appropriate mitigation strategies and obtaining all necessary permits.</p>
Special status species impacts	<p>If potential bog turtle habitat is found in or near the project area, efforts should be made to avoid and direct or indirect impacts to those wetlands (see enclosed <i>Bog Turtle Conservation Zones</i>). Avoidance of direct and indirect effects means no disturbance to or encroachment into the wetlands for any project-associated features or activities. Adverse effects may also be anticipated to occur when lot lines include portions of the wetland; when an adequate upland buffer is not retained around a wetland (see <i>Bog Turtle Conservation Zones</i>); or when project features affect the hydrology of the wetland.</p> <p>We recommend that if potential habitat is found, you submit (along with your Phase 1 survey results) a detailed project description and detailed project plans documenting how direct and indirect impacts to the wetlands will be avoided. If adverse effects to these wetlands cannot be avoided, a more detailed and thorough survey should be done,</p>	<p>As stated in the <i>Draft GMP/EIS</i> on page 1-35, the <i>Draft GMP/EIS</i> is a programmatic document that is not intended to assess site-specific impacts. As discussed on page 5-7 of the <i>Draft GMP/EIS</i>, proposed actions have been designed to avoid and/or minimize adverse impacts to wetlands to the extent practicable in a programmatic document. As individual actions are subsequently implemented, the site-specific studies will be conducted, including surveys for suitable bog turtle habitat by a qualified surveyor, and all required compliance will be completed, including analysis in an appropriate NEPA document and consultation with the U.S. Fish and Wildlife Service.</p>

Table 1: Responses to Substantive Agency Comments (continued)

Topic	Comment	Response
	as described under " <i>Bog Turtle Survey</i> " (Phase 2 survey) of the <i>Guidelines</i> . The Phase 2 survey should be conducted by a qualified biologist with bog turtle field survey experience (see enclosed list of qualified surveyors), and survey results should be submitted to this office for review and concurrence.	

Table 2: Responses to Substantive Public Comments

Topic	Comment ²	Response
Historic viewsheds	Chapter 2 pg 2-42 paragraph 7 - historic views - the plan does not show which views will be reestablished, and how this is to be done. While some areas will need to have trees removed, no indication of what vegetation will be affected was given. Future attempts to reestablish the views will need to clarify what areas are to be affected during the planning stage for public comment.	<p>The locations of historic views to be re-established are noted on page 2-42 in the <i>Draft GMP/EIS</i>. The impacts of viewshed clearing on vegetation are described on page 4-50, and the impacts of viewshed clearing on wildlife and habitat are described on page 4-55. At most, views among Redoubts 1, 2, 3, 4, the Star Fort, and Stony Battery would be re-established. Trees to be removed include oaks and tulip trees that were planted or seeded in the early 20th century, and pines that were planted in the 1960s. No state champion trees, historic trees, or sensitive species are located within the areas to be cleared; therefore, there would be no impacts to such vegetation. The process for viewshed restoration would include the removal of trees and shrub vegetation, where necessary. Each area would be seeded with native grasses and regularly mowed to maintain open views.</p> <p>The <i>Draft GMP/EIS</i> has been revised to further clarify the potential impacts. See Appendix A: Errata (errata 15 and 16) for specific changes.</p>

² No grammatical or editorial changes have been made to the comments. They are presented as provided by the commenter.

Table 2: Responses to Substantive Public Comments (continued)

Topic	Comment	Response
Dam removal	<p>MO [Management Objective] 15 The way this objective is written the 1930s dam on Valley Creek should be removed. Dams with significance for historical interpretation should not be removed, including Colonial Springs dam, Maxwell's and Stirling's runs - work with township to better manage storm water, rehabilitate and construct new check dams within the Park boundaries. Dams within the park and Valley Creek watershed - work with local authorities to better manage silt build up behind these dams. Any damage to these dams could release considerable amounts of silt into the stream and impair the water quality of Valley Creek with the Park.</p>	<p>As stated in the <i>Draft GMP/EIS</i>, page 1-35, a GMP/EIS is a programmatic level of planning that is not meant to assess the site-specific impacts of individual projects. Therefore, the potential impacts of dam removal are presented qualitatively, from a programmatic perspective. The <i>Draft GMP/EIS</i> proposes removal of several failing dams within the park. Dams on Meyer's Run, Fisher's Run, and Valley Creek are mentioned specifically and depicted on Figure 3-4. Prior to removal of these dams, further site-specific study and any required compliance would be completed.</p> <p>Additional text has been provided in Appendix A: Errata (erratum 10) to note which dams would be considered for removal.</p>
Off-trail biking impacts	<p>The impact of existing off-trail biking was SEVERELY exaggerated. Most of these trails are existing deer paths, and none that I am aware of are enhancing erosion or damage. The low-lying wetlands areas would be avoided by any responsible off-road cyclist (which comprise most of the community I am involved in). Sustainable trails *can* be created and managed, and we have the local resources to do so largely with volunteer effort.</p>	<p>The personal tracks that have been illegally constructed are causing erosion and are damaging archeological resources, wetlands, and vernal ponds. The intensity of impact was not quantified in the <i>Draft GMP/EIS</i>. As stated in the <i>Draft GMP/EIS</i>, page 1-35, a GMP/EIS is a programmatic level of planning that is not meant to assess the site-specific impacts of individual projects.</p> <p>The more than 20 miles of designated and proposed bicycle trails in the park are sited and maintained to avoid such resource impacts and to be managed sustainably.</p>

Table 2: Responses to Substantive Public Comments (continued)

Topic	Comment	Response
Off-trail biking impacts	<p>Comments in the report with respects to damage caused by mountain bikes frustrates me as horses clearly do far more damage than mountain bikes. All one needs to do is walk the off-road trails and see the damage horses hoofs do to the terrain; they leave 2"-4" depressions in the earth, and have made some of the trails in valley forge un-runable (the trails along both sides of the river, for example). I disagree with the report that mountain bikes are the cause of erosion in the park and rather feel that the use of horses on the trails cause much of the damage. If anything should be done curtail erosion of the unpaved trails in the park it should be the banning of horse use, not mountain bike use. The most significant contributing factor to erosion is obviously water run-off from rain.</p>	<p>The <i>Draft GMP/EIS</i> notes on pages 1-6 and 1-19 that off-trail usage is causing unacceptable impacts to resources within the park. Off-trail usage by mountain bikes is based on visual evidence by park staff and the citations issued for off-trail usage.</p> <p>The <i>Draft GMP/EIS</i> makes no comparisons of the relative impacts of bicycling, hiking, and horseback riding on trails. Any off-trail usage leads to unacceptable impacts to park resources and values.</p>
Off-trail biking impacts	<p>I would also say that the impact of off-trail biking was overstated in this report, and that further discussions regarding the areas that are sustainable should be held in order to refute those claims with factual information, and examples of how to maintain a sustainable trail system.</p>	<p>The personal tracks that have been illegally constructed are causing erosion and are damaging archeological resources, wetlands, and vernal ponds. The intensity of impact was not quantified in the <i>Draft GMP/EIS</i>. As stated in the <i>Draft GMP/EIS</i>, page 1-35, a GMP/EIS is a programmatic level of planning that is not meant to assess the site-specific impacts of individual projects.</p> <p>The more than 20 miles of designated and proposed bicycle trails in the park are sited and maintained to avoid resource impacts and to be managed sustainably.</p>

Table 2: Responses to Substantive Public Comments (continued)

Topic	Comment	Response
Model airplanes	We are unclear why the Valley Forge Signal Seekers, a model-airplane club, are allowed to hold a special-use permit when the use does not relate to the mission of the park and when no other group holds such a permit.	<p>The pre-existing Special Use Permit that allows use of a particular site to the Signal Seekers model airplane club and to other airplane hobbyists who comply with certain licensing and permitting rules expires December 31, 2008. At that time, if the club applies to renew the permit, the use will be evaluated in accordance with <i>NPS Management Policies 2006</i> and with the management objective in the <i>Draft GMP/EIS</i> that notes that</p> <p><i>...appropriate recreational uses would continue to be welcomed in the park. Activities that contribute to public understanding of park history and resources are appropriate (page 2-43).</i></p>
Park operations	Chapter 2 pg 2-37 Last paragraph - the assumption that visitation would not significantly increase is not justification enough to decrease the number of law enforcement (LE) rangers. On the contrary, if the action alternatives are implemented, multiple buildings would be rented to outside businesses as a source of revenue (pg 2-39 "historic structures"). Employees working late and coming in contact with the visiting public could require additional LE presence in the park near these sites.	As noted on page 2-37, the plan does not propose reducing the number of rangers but rather realigning the existing complement to include fewer permanent full-time rangers and more seasonal and term law enforcement rangers. There would be no reduction in the number of full-time equivalent (FTE) personnel. This proposal would allow greater flexibility in responding to the variable seasonal highs and lows of the number of visitors. The plan also proposes adding one law enforcement specialist for investigations to be shared with another unit of the national park system.

Table 2: Responses to Substantive Public Comments (continued)

Topic	Comment	Response
Park operations	<p>Chapter 2 pg 2-38 Fees-The priority to attempt to collect fees by the NPS at this site has led to profound changes in the park landscape After reviewing the plan, and then reading this paragraph, I came to realize that a vast majority of the changes in both action alternatives are geared primarily to decrease free public access to the park. Example: three parking lots easily accessible along Route 23 are being removed, funneling visitors to the open lots, at least half of which would be a fee collection area. The need to collect fees and keep the parking lots at those fee areas really seems to push the boundaries of the park service mission.</p>	<p>The parking lots proposed to be removed are those that are rarely used and that impair the historic landscape. In the case of the three lots proposed to be removed on Route 23, two are used less than 5% of the time, and one is well used and will be relocated to a less visually obtrusive site nearby. There will continue to be nine parking lots accessible from Route 23, which is a state road and always freely open to the public. Overall, 15 parking lots will continue to be accessible from state and local public roads. The total number of parking lots in the park will change from 26 to 21. There also are pull-offs along roads that provide additional parking. All areas of the park will continue to be served by parking. No physical changes are proposed by the plan with the intent to limit public access.</p> <p>As the <i>Draft GMP/EIS</i> states on page 2-46:</p> <p><i>Options would be evaluated for a fee structure that would provide reasonable fees, and that would fairly accommodate not only once-in-a-lifetime visitors, but also frequent visitors.</i></p>
Parking lots	<p>The parking lot on Yellow Springs road is being removed and relocated farther west near the park entrance. While this lot was small, it was at the base of Mount Misery, and is well shaded by the trees. The new lot will have a larger capacity, with picnic areas and bathrooms, but the visitor who wants to climb up a mountain in the shade will first have to park their car in the new lot, cross the road, then proceed 1,600 feet along an unshaded path to the original location of the lot to begin their hike (see fig 2-1 1). Instead of a relaxing stroll along the creek or a nice hike in the woods, the beginning and the end of the walk will be hot and difficult.</p>	<p>The current parking lot on Yellow Springs Road is too small for the volume of use it receives. Enlargement of the lot at this site and provision of trail head amenities would have adverse impacts on adjacent cultural and natural resources. The plan proposes serving the greater need of visitors by relocating the parking lot to a site in which it can be enlarged, would be served by public restrooms, and would be screened from view. The new parking lot would be directly connected to the existing trail system by a new trail which would be located on terrain that is level, as compared to Mount Misery.</p>

Non-substantive Comments

Treatment of Suggestions

Commenters sent many suggestions regarding park administrative, maintenance, and interpretive operations. Examples include such recommendations as increasing the use of bio-fuel in park vehicles; using make-up and tattered clothing for costumed interpreters; modifying signs; adding new interpretive topics; and similar suggestions. Detailed operational suggestions are not considered to be substantive under the definition noted above. Additionally, detailed operational suggestions are appropriately addressed on a day-to-day basis or in an implementation plan, rather than in a GMP. Therefore responses to these suggestions are not provided. The suggestions are valuable, however, and will be considered by park staff outside the GMP/EIS planning process.

Bicycle Use

A number of comments were received regarding bicycle use in the park. Substantive comments are answered in Tables 1 and 2 above. Most comments regarding bicycle use were not substantive, however. These comments generally reflected apparent confusion about current NPS policy and/or the trails proposal of the *Draft GMP/EIS*. Therefore it is important to clarify the policy of the NPS and the contents of the *Draft GMP/EIS*.

Bicycle Use Will Continue

Some commenters appeared to mistakenly believe that the *Draft GMP/EIS* proposes to close park trails to bicycle use. This is not correct. The *Draft GMP/EIS* states the following:

In both action alternatives, the park's disparate collection of trails would be organized, completed, and managed as a system. The system would comprise existing trails and limited new trails to provide a variety of visitor experiences related to the park's history and natural resources. Effective signage would be installed at key locations. Trailheads with adequate yet unobtrusive parking, restrooms, and information would be added. Some authorized trails that are unmaintainable and any personal trails that damage resources would be eliminated.

In both action alternatives, connections to planned regional trails would be made at the Port Kennedy (connection with future Upper Merion system) and at Wilson Road (connection to Patriots Trail/Chester Valley Trail). In order to manage the capacity of and build on previous investment in existing bike trails, a pedestrian/bicycle bridge would be built over the Schuylkill River, connecting long-distance bicycle trails in the west end of the park and removing them from the park's historic core. A trail crossing of US 422 is proposed, which would link the two halves of the park's north side, currently bisected by the highway. This also would enable a trail link to Mill Grove, the National Audubon Society/Montgomery County art and natural resources educational facility (pages 2-35 -2-36).

New trail segments could be established where they meet the following goals and criteria:

- *Provide safe access to key features*
- *Make loop circulation possible*
- *Provide good experience or interpretive value*
- *Easily maintainable*
- *Trailhead available or feasible to make available*
- *No cultural or natural resources are affected (page 2-35, text box)*

The *Draft GMP/EIS* also summarized the analysis that led to the proposal for the trail system:

The Trails Assessment for Valley Forge National Historical Park (Olmsted Center 2003) analyzed and developed recommendations for each trail in terms of sustainable use (e.g., hiking, horse, and/or biking), maintenance of the existing trail, or if necessary, rerouting or closure of sections that cannot feasibly be maintained. The assessment also provided suggestions for establishing connections that would make loop trails available. Public workshops focused on trails and recreations were held as part of the GMP planning process; these generated additional information and ideas. Trail recommendations are incorporated in this GMP/EIS (page 1-20).

Figure 2-10 in the *Draft GMP/EIS* shows the proposed 34.55-mile trail network. The document proposes the removal of 0.32 miles of trail because they dead-end onto railroad or high tension line rights-of-way that are illegal or inappropriate, respectively, for use as trails. An additional 4.12 miles of trail are proposed to be added in order to complete loops or provide better connections to regional trails and neighboring sites.

The length of trails authorized for bicycling is proposed to increase. Bicycling will continue to be allowed on the same 20.68 paved and unpaved miles of authorized trails on which it now is allowed, as well as on 1.12 miles of the proposed trails. In addition, bicycling will continue on the Schuylkill River Trail in the park, which also runs for 25 miles south of the park, and the Perkiomen Trail, which runs for 22 miles north. A connection with Upper Merion Township's system of hike/bike trails will be completed with the reconstruction of the Betzwood Bridge. Connections to the Audubon Trail Loop and to the future multi-purpose Chester Valley Trail also are proposed.

Shared Use of Trails

Some commenters noted that shared-use trails are the most efficient use of agency resources. At Valley Forge NHP, most trails in the park are designated for shared use, serving as many types of users as possible. Although as many trails as possible are open for biking, not all trails are available for all uses.

The trails where biking is not allowed were identified for one or more of these reasons:

- ***Steepness.*** Bicycle use on steep trails leads to erosion that damages down-slope streams and wetlands and exposes archeological resources.
- ***Other experiences.*** Some trails are set aside for people seeking a quiet hike or a place to safely ride a horse.

To see detailed maps of current trail authorizations, please visit the park website at www.nps.gov/vafo/planyourvisit/things2do.htm. Trail maps also are posted on the 13 bulletin boards at trail heads throughout the park. Park trail maps are available at the park Welcome Center or by request.

Use of Trail Volunteers

Some commenters recommended that the park use volunteers to help with trail maintenance and for working with the public on orientation and information about trails. Volunteers are an essential part of this work. In fiscal year 2006, 184 volunteers contributed 3,260 hours to trail maintenance at Valley Forge NHP. Also in 2006, a Park Watch was established, in which trained volunteers provide visitor information services and also patrol and assist park rangers in managing uses. Additional individual and organizational volunteers are always welcome, and opportunities are posted on the park website at www.nps.gov/vafo/supportyourpark/volunteer.htm.

Sustainability of the Trail System

Some commenters recommended that the park work with bicycling organizations to research, design and construct a sustainable trail system. The *Trails Assessment for Valley Forge National Historical Park* (Olmsted Center 2003) is the product of an assessment and planning process carried out by trail experts.

Recommendations of the assessment were incorporated as proposals in the *Draft GMP/EIS*. The proposed trail system of more than 34 miles of bicycle, hiking, and horseback trails is designed to be managed sustainably. During two public workshops on the draft alternatives in 2003, 160 members of the public reviewed and discussed the trail proposals.

Appropriate Recreational Use in Valley Forge National Historical Park

Policies on appropriate recreational use of units of the national park system are set at the national level and are detailed in *NPS Management Policies 2006*. Recreational uses must be related to the purpose for which the park was established. The United States Congress established the purpose of Valley Forge NHP to

Educate and inform present and future generations about the sacrifices and achievements of General George Washington and the Continental Army at Valley Forge, and the people, events, and legacy of the American Revolution; preserve the cultural and natural resources that embody and commemorate the Valley Forge experience and the American Revolution; and provide opportunities for enhanced understanding (Draft GMP/EIS page 1-1).

Recreation is not a purpose for which Valley Forge NHP was established. The *Draft GMP/EIS* notes, however, that recreation is traditional at the park and that

...appropriate recreational uses would continue to be welcomed in the park. Activities that contribute to the public's understanding of park history and resources are appropriate. Activities that damage park resources would continue to be prohibited (page 2-36).

During a planning process to guide the evaluation of the appropriateness of any given recreational use, *NPS Management Policies 2006* states that

...many forms of recreation enjoyed by the public do not require a national park setting and are more appropriate to other venues. The Service will therefore

- *Provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in parks;*
- *Defer to local, state, tribal, and other federal agencies; private industry; and nongovernmental organizations to meet the broader spectrum of recreational needs and demands (section 8.2).*

Off-Trail Bicycle Use

Some commenters requested that the park not be closed to off-trail bicycle use. Off-trail bicycling has never been authorized within Valley Forge NHP, however. Some individuals illegally ride their bicycles off-trail through the park's forests and meadows. Other visitors may believe that these tracks are authorized trails, leading to the incorrect perception that off-trail use is authorized; however, this is not the case.

Some commenters requested that the park consider authorizing off-trail bicycle use. This use was considered during the GMP/EIS process. The decision was made to continue to prohibit it throughout the park because it:

- Is not related to the purpose for which Congress established the park
- Destroys trees, shrubs, and herbaceous plants
- Destroys habitats of animals such as salamanders, snakes, turtles, birds, and others, some of which are listed as threatened
- Exposes and crushes archeological resources

- Strips grasses, leading to erosion that damages streams and wetlands and exposes archeological resources

Future of Personal Tracks

In some cases, members of the public have illegally built personal bicycling tracks in the park, including cutting down trees and shrubs and moving earth. Some commenters requested that these personal tracks be designated as part of the park's trail system. The trail system proposed in the *Draft GMP/EIS* accords with the purpose of the park, provides access to key historical features of the park and to the key natural features that can withstand heavy use, and provides access to all areas of the park while including no segments that would damage cultural or natural features.

Existing personal tracks were evaluated during the *Trails Assessment for Valley Forge National Historical Park* (Olmsted Center 2003). In every case, the tracks failed to meet the criteria noted above.

Other Non-substantive Comments

Table 3 provides responses to other non-substantive comments that required further clarification of NPS policy or of the information provided in the *Draft GMP/EIS*.

Table 3: Responses to Other Non-substantive Comments

Topic	Comment ³	Response
Alternative mapping	We note that the summary map (Figure 2-12) lists various improvements proposed under Alternative C, yet it seems to omit the slip ramp proposed at Route 422 and Pawlings Road. It also does not depict the relocation of the maintenance depot and the refilling of the quarries.	In general, the summary map depicts the location of interpretive, visitor experience, and facility changes. The general location of the relocated maintenance facility is provided on the graphic. Transportation elements are depicted on the transportation graphics, Figures 2-2 through 2-5. The locations of quarries to be filled are provided on Figure 1-3.
Stormwater	The National Park Service should use the new PADEP stormwater manual and/or indicate its use in the FEIS.	The park does follow the guidelines presented in the Pennsylvania Department of Environmental Protection stormwater manual for compliance with the National Pollution Discharge Elimination System. Use of this manual will be noted in the summary of proposed mitigation to be provided in the ROD.
Mitigation	Mitigation for impacts should be discussed in the FEIS.	Mitigation for potential impacts is provided under each impact topic in Chapter 4: Environmental Consequences. A summary of all proposed mitigation will be provided in the ROD.

³ No grammatical or editorial changes have been made to the comments. They are presented as provided by the commenter.

Table 3: Responses to Other Non-substantive Comments (continued)

Topic	Comment	Response
Historic structure mapping	Chapter 2 pg 2-32 Historic Structures - This paragraph refers the reader to Appendix D which as a listing of the structures, yet I could not find a map corresponding to the structures list. A series of maps showing the names and locations and historical significance of the structures should have been included. Not many of the names used for the houses are commonly known, so the reader has no frame of reference.	Figures 1-2 and 3-1 provide the locations of the more commonly known historic structures. For more comprehensive mapping, please refer to the park website at http://www.nps.gov/vafo .
Wetland mapping	The wetlands discussion in Section 3.4.7 should be quantified and labeled on a map as Figure 3-4 does not adequately support the text. For example, page 3-39, states that, "The largest wetland in Valley Forge is located within the floodplain on the south bank of the Schuylkill River, between the railroad tracks and the river." Figure 3-4 should clearly depict/label the exact location of this wetland (and others referenced in Section 3.4.7). In addition, the landmarks mentioned in the text to pinpoint wetlands locations should also be indicated on the map (i.e. railroad tracks, Port Kennedy Train Station, Maurice Stephens House, General Varnum's Quarters, Mount Misery, Lord Stirling's Quarters, Fatland Island, etc.	Because the <i>Draft GMP/EIS</i> is programmatic in nature, resources are described at a cursory level. Wetlands are generally quantified and described in Section 3.4.7 and mapped on Figure 3-4. The largest wetland within the park is appropriately located, and the wetland to potentially be filled by the actions within the Grand Parade also is depicted. The landmarks mentioned in the text are included on Figure 1-2 but were removed from Figure 3-4 for clarity.
Impacts	Table 2-5: Summary of Environmental Consequences would be more useful if it quantified (where possible) the environmental impacts described in Chapter 4: Environmental Consequences.	Quantifications are not provided in Table 2-5 because they would present a false picture of potential impacts to park resources and values. Because the <i>Draft GMP/EIS</i> is programmatic in nature, the majority of potential impacts are described in general terms and merely qualified. Implementation plans and further NEPA compliance will be required for some of the proposed actions; therefore, potential impacts will be quantified at that time.

Table 3: Responses to Other Non-substantive Comments (continued)

Topic	Comment	Response
Trail network	The mapping of trails should be kept current. Present maps show existing trails that no longer exist and trails around the edges of fields are not mapped. A trail network should be developed using loops; dead-end trails should be eliminated whenever possible.	Figure 2-10: Proposed Trail Network depicts a proposal, rather than the current trail network. Maps of the current network may be found on the park website and on bulletin boards at the 13 park trail heads. See page 2-35 for a description of the proposal, which includes establishing loops using existing trails and limited new connections. The edges of fields are mown as fire breaks and not all of them are considered to be designated trails.
Water resources	The plan should acknowledge the development of the stormwater management plan for the Valley Creek currently being prepared by Chester County.	The <i>Valley Creek Integrated Stormwater Management Plan</i> is discussed in the document on pages 1-33 and 4-5. The beneficial impacts of the plan are included in the discussions of cumulative impacts, where appropriate.
Permit requirements	Work in streams and wetlands require permits from the Pennsylvania Department of Environmental Protection and/or the Army Corps of Engineers. We suggest that you contact DEP and the Corps at the addresses found in the enclosed list for information on permit requirements. Please be advised that the Service generally recommends that the Corps and DEP do not grant permits to destroy streams and wetlands.	All required permits will be obtained prior to any proposed action that may disturb streams and/or wetlands (such as the Schuylkill River pedestrian crossing).

Appendix A: Errata

Some of the comments resulted in editorial changes to the *Draft GMP/EIS* text. These changes are listed below and are presented in sequential order, based on the *Draft GMP/EIS* layout. Based on coordination with the SHPO, several changes have been made to the draft Programmatic Agreement. A revised copy of this document is appended in its entirety (Appendix B). The combination of the *Draft GMP/EIS* and this *Abbreviated Final GMP/EIS* (which includes the errata below) constitutes the complete and final record on which the ROD will be based.

1. Throughout the document, replace “Horseshoe Trail” with “Horse Shoe Trail.”
2. On page 2-33, paragraph 4, sentence 3, replace “deer” with “vegetation.”
3. On page 2-33, last paragraph, last sentence, replace “deer” with “vegetation.”
4. On page 2-40, paragraph 4, sentence 3, replace “deer” with “vegetation.”
5. On page 2-40, paragraph 5, last sentence, replace “deer” with “vegetation.”
6. On page 3-17, first paragraph, replace “Kurtz 2001” with “Valley Forge NHP 2001a.”
7. On page 4-15, paragraph 5, add the following text before the parenthetical notation: “All contributing structures were physically surveyed and described during the List of Classified Structures Field Inventory. Mitigation for demolition of contributing structures will include, at a minimum, scaled, face-on photographs of each façade of the structure. A set of these photographs will be provided to the Pennsylvania SHPO.”
8. On page 4-17, paragraph 1, add the following text before the parenthetical notation: “All contributing structures were physically surveyed and described during the List of Classified Structures Field Inventory. Mitigation for demolition of contributing structures will include, at a minimum, scaled, face-on photographs of each façade of the structure. A set of these photographs will be provided to the Pennsylvania SHPO.”
9. On page 4-18, paragraph 5, add the following text at the end of the paragraph: “All contributing structures were physically surveyed and described during the List of Classified Structures Field Inventory. Mitigation for demolition of contributing structures will include, at a minimum, scaled, face-on photographs of each façade of the structure. A set of these photographs will be provided to the Pennsylvania SHPO.”
10. On page 4-42, paragraph 6, insert the following text at the end the first sentence: ...“, including dams on Meyer’s Run, Fisher’s Run, and Valley Creek.”
11. On page 4-45, paragraph 7, add the following text before the last sentence, “Prior to design and implementation of the proposed pedestrian/bicycle crossing of the Schuylkill River, further NEPA compliance would be required, including a Statement of Findings for Impacts to Wetlands. During this process, wetlands would be delineated and confirmed by the Army Corps of Engineers. If it is determined that wetland areas cannot be avoided, mitigation strategies would be developed and appropriate permits would be obtained.”

12. On page 4-46, paragraph 6, add the following text after the second sentence: “It is likely that the asbestos remediation project will impact this small wetland. If the wetland remains intact, then prior to the design of the interpretive features within the Grand Parade the wetland area would be delineated and verified by the Army Corps of Engineers.”
13. On page 4-46, paragraph 6, add the following text to the last sentence, where indicated: if avoidance is not possible, “a Statement of Findings for Impacts to Wetlands would be prepared, appropriate permits would be obtained, and.”
14. On page 4-46, paragraph 7, add the following text before the last sentence: “Prior to design and implementation of the proposed Schuylkill River crossing, further NEPA compliance would be required, including a Statement of Findings for Impacts to Wetlands. During this process, wetlands would be delineated and confirmed by the Army Corps of Engineers. If it is determined that wetland areas cannot be avoided, mitigation strategies would be developed and appropriate permits would be obtained.”
15. On page 4-50, paragraph 10, delete the second sentence and add the following text after the first sentence, “The process for viewshed restoration would include the removal of selected trees and shrub vegetation between Redoubts 1, 2, 3, 4, the Star Fort, and Stony Battery. Trees to be removed include oaks and tulip trees that were planted or seeded in the early 20th century, and pines that were planted in the 1960s. Trees and shrubs would be cut as close to the ground surface as possible, so as not to leave stumps. No state champion, historic trees, or sensitive species are located within the areas to be cleared; therefore, there would be no impacts to such vegetation. Each area would be seeded with native grasses and regularly mowed to maintain open views. Therefore, approximately 15 of 20 acres would remain as vegetative cover, converting from forest to meadow habitat, a long-term, moderate, beneficial impact.”
16. On page 4-55, paragraph 5, add the following text before the last sentence, “No sensitive floral or faunal species are known to exist within the areas to be converted.”
17. On page 5-17, under Organizations and Agencies, add the following text: “Southeastern Pennsylvania Group Sierra Club.”
18. Under References, Acronyms, add the following entries, where appropriate:
 - i. “API Asset Priority Index
 - ii. FCI Facility Condition Index
 - iii. FMSS Facility Management Software System”
19. In Appendix D, add the following text at the bottom of each table (Tables D-1, D-2, and D-3): “Notes: 1. All structures noted above are listed as contributing structures. 2. See References: Acronyms for acronym explanations.”
20. In Appendix D, Table D-3, page D-13, under Samuel Brittain Sr. House – LCS 80250, replace “Preserve as is” with “Demolish.”
21. In Appendix F, page F-2, under Management Objective 31, “Re-establish historic views at Redoubts 1, 2, 3, and 4 and from Star Fort to Stony Battery,” remove the “X” under NEPA Compliance.

Appendix B: Programmatic Agreement Revisions

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**PROGRAMMATIC AGREEMENT AMONG THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICE
AND
VALLEY FORGE NATIONAL HISTORICAL PARK,
NATIONAL PARK SERVICE**

**FOR IMPLEMENTATION OF THE VALLEY FORGE NATIONAL HISTORICAL
PARK GENERAL MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT**

WHEREAS, the National Park Service (“NPS”) manages and administers the Valley Forge National Historical Park (hereafter, “the park”) as a unit of the National Park System and is responsible for preserving, restoring, maintaining, and interpreting the cultural resources of the park unimpaired for the enjoyment of future generations; and

WHEREAS, the NPS has entered into a Nationwide Programmatic Agreement with the Advisory Council on Historic Preservation (“Council”) and the National Conference of State and Historic Preservation Officers, dated October 1995, to carry out its Section 106 responsibilities with respect to the management of park areas; and

WHEREAS, the Nationwide Programmatic Agreement encourages development of park specific programmatic agreements to supplement the provisions of the Nationwide Programmatic Agreement; and

WHEREAS, the park is nationally significant as the site of the 1777-78 encampment of the Continental Army, and the commemoration of the event; and

WHEREAS, the purpose of the park is to educate and inform present and future generations about the sacrifices and achievements of General George Washington and the Continental Army at Valley Forge, and the people, events, and legacy of the American Revolution; preserve the cultural and natural resources that embody and commemorate the Valley Forge experience and the American Revolution; and provide opportunities for enhanced understanding; and

WHEREAS, the mission of the park is to educate the American people about one of the most defining events in our nation’s history and preserve the natural and cultural resources that commemorate the encampment of the Continental Army at Valley Forge in 1777-78; and

WHEREAS, in ~~2006~~2007, after conducting new research and analysis and following public review and comment, the National Park Service will adopt a new *General Management Plan* (“GMP”) in accordance with NPS *Directors Order # 2: Park Planning* Section 3.3.1.0 General Management Planning; and

WHEREAS, the NPS in consultation with the Pennsylvania State Historic Preservation Officer (“SHPO”) and Council has determined that the undertakings described in the GMP may have an effect upon properties either listed on or eligible for listing on the National Register of Historic Places (“National Register”); and

WHEREAS, as part of the GMP process, the NPS has identified various parties that were invited to participate in the development of this Programmatic Agreement; and

WHEREAS, the National Historic Preservation Act of 1966, as amended (“NHPA”) governs the treatment of archeological and historic properties; that NPS recognizes its responsibilities in executing provisions of Sections 106 and 110 of that Act; and that *Director’s Order 2: Cultural Resource Management Guidelines* outlines NPS policy in regard to the preservation and treatment of archeological, cultural, and historic properties within the park; ~~and~~

NOW, THEREFORE, the park, Council, and the Commonwealth of Pennsylvania acting through the Pennsylvania SHPO mutually agree that the NPS will carry out its Section 106 responsibilities with respect to management of the park and implementation of the GMP in accordance with the following guidelines:

STIPULATIONS

The NPS will ensure that the following measures are carried out:

I. POLICY

- A. In General:** NPS will continue to preserve and foster appreciation of the cultural resources in its custody through appropriate programs of protection, research, treatment, and interpretation. At the park, NPS will adhere to relevant provisions of the NHPA, National Environmental Policy Act (“NEPA”) and other such laws, regulations, and policy guidelines cited in Section I of the Nationwide Programmatic Agreement for Compliance with Section 106 of the NHPA (effective October 1 1995).

II. IDENTIFYING CULTURAL RESOURCES

- A. SHPO Coordination:** NPS will coordinate with the SHPO activities for research related to resource management needs and identification, evaluation, and registration of park historic and prehistoric properties. NPS fulfills these responsibilities under Sections 106 and 110 of the NHPA; and the Nationwide Programmatic Agreement with respect to such properties and sites located within the legislative boundary of the park.
- B. Inventory of Cultural Resources:** To this end and in conformance with other NPS policy and practices, NPS will maintain a current inventory of prehistoric and historic properties and resources known to exist within the park’s legislative boundary.
- C. National Register/National Historic Landmark Documentation:** Consistent with the NPS Management Policies, NPS will complete an update of the National Register or National Historic Landmark documentation for the park, including its nationally significant cultural landscapes. Among other things, the documentation will identify component landscape features, buildings, sites, structures, and objects that contribute to the national significance of the park.

III. DELEGATION OF AUTHORITY

- A. Park Superintendent:** Consistent with the Nationwide Programmatic Agreement, the park Superintendent is the “responsible agency official” as defined in 36 CFR Section 800.2(a) for purposes of Section 106 compliance. The Superintendent is accountable for the performance of Section 106 compliance through standardized NPS performance and program evaluation procedures at the park.

- B. 106/NEPA Committee:** In conformance with Stipulation VIII of the Nationwide Programmatic Agreement, subject matter specialists will provide the Superintendent with advice and technical services for cultural resource issues relating to Section 106 compliance. To this end, the responsible entity within the park to perform this function is the park 106/NEPA Committee (hereafter the Committee) chaired by a professional staff coordinator appointed by the Superintendent. The Section 106 Coordinator will be responsible to coordinate and monitor the park's Section 106 compliance process and to prepare such periodic reports as deemed necessary and appropriate.
- C. Consulting Parties:** It is hereby agreed that, irrespective of the programmatic exclusions in this agreement, the SHPO and/or Council may at any time request consultation on programmatic and project matters where they wish to participate as a "consulting party" within the scope and meaning of their respective roles, as defined in NHPA and Council regulations.

IV. PROJECT/PROGRAM AND PROGRAMMATIC EXCLUSIONS

- A. Standard Programmatic Exclusions pursuant to the Nationwide Programmatic Agreement:** Undertakings consistent with the GMP for the park will be reviewed for Section 106 purposes within the NPS, without further review by the Council ~~or~~ the SHPO, provided:
- That these undertakings are based upon information adequate to identify and evaluate affected cultural resources (except for IV.B.(5), acquisition of park lands);
 - That the NPS finds that their effects on cultural resources listed on or eligible for listing on the National Register will not be adverse based on criteria in 36 CFR Section 800.5;
 - That the decisions regarding these undertakings are made and carried out in conformity with applicable policies, guidelines, and standards as identified in Stipulation I of the Nationwide Programmatic Agreement, as well as the Commonwealth of Pennsylvania's *Guidelines for Archeological Survey* and other applicable policies, guidelines and standards, and are documented by NPS using the form for "Assessment of Actions Having and Effect on Cultural Resources" or another appropriate format;
 - That NPS provides 36 CFR (Part 61-Appendix A) qualified subject matter experts who provide advice and consultation to the Superintendent regarding these matters;
 - That all actions are subject to the additional stipulations included in IV.B. and IV.C. of this agreement.

The standard stipulations ~~and park specific addenda~~ include:

1. **Preservation Maintenance**, including housekeeping, routine and cyclic maintenance, and stabilization as defined in *Directors Order #28*. At the park, those activities include housekeeping, routine and cyclic maintenance, and stabilization of the park's historic structures or features, such as historic houses and outbuildings, fences and stone walls, and cannons and cannon carriages. In

addition, routine preservation and restoration of monuments, tablets, statues, and memorials may be reviewed under the terms of this section. Section IV.C.(1)(j) includes stipulations regarding more complex preservation and restoration.

2. **Routine Grounds Maintenance**, such as grass cutting and tree trimming. At the park, this includes activities such as grass replanting, management of commemorative trees (replacement and maintenance), woodland and woodlot management (including tree trimming and hazard tree removal, woodlot thinning, routine removal of exotic or non-historic introduced species) and maintenance or replacement in-kind of existing and contributing natural historic landscape components and features.
3. **Environmental Monitoring**, such as installation of environmental monitoring units for monitoring water, air, or other environmental quality.
4. **Archeological Monitoring and Testing**, investigations of historic structures and elements of the park's component cultural landscapes identified in the park's GMP that involve ground disturbing activities or intrusion into historic fabric for research, resource management, or inventory purposes.
5. **Land Acquisition or Disposition**, including acquisitions of lands or interests in lands for park purposes, including easements or additions
6. **Roads and Trails**, including rehabilitation of existing trails, walks, paths, and sidewalks within previously disturbed areas, or repaving of existing roads or existing parking areas within previously disturbed areas.
7. **Utility Lines**, including placement, maintenance, or replacement (including burying) of utility or transmission lines and fences within utility easement corridors, in documented archeological sites, and/or previously disturbed areas.
8. **Cultural Landscape Rehabilitation**, including rehabilitation and preservation work limited to actions for retaining and preserving, protecting, maintaining, restoring, repairing, and replacing in kind materials and features, consistent with the *Secretary of the Interior's Standards for Rehabilitation* and accompanying guidelines. ~~At the park, this would include actions that are consistent with the management prescriptions identified in the approved GMP and subsequent cultural landscape treatment plan for preserving and maintaining the park and its component landscapes. In addition, actions to preserve features that contribute to the battlefield landscape may be reviewed under the terms of this section.~~
9. **Health and Safety**, including activities such as radon mitigation, removal of asbestos, lead paint, buried oil tanks, and removal of HAZMAT materials within previously disturbed areas.
10. **Detection/Suppression Systems**, including installation of fire detection and suppression systems, security alarms systems and upgrading (or installation) of HVAC systems in historic structures.

11. Interpretive Media, including erection of signs, wayside exhibits, plaques, and other interpretive media that facilitates greater understanding by the visiting public of the park and its resources.

~~12.~~ **12.—Use of Historic Properties for Park Administrative Purposes, Leasing and Employee Housing**, provided proposed treatments are limited to and consistent with IV.A 1, 8, 9, and 10 and other activities excluded under IV A and B.

B. Park Specific Stipulations – Consultation Requirements: ~~Can~~ consistent with Stipulation IV.D., V.B., and VI.C. of the Nationwide Programmatic Agreement, NPS and SHPO hereby further stipulate the following cultural resource consultation requirements and with respect to the park:

1. In general: Parties to this agreement recognize that the purpose of this section is to continue an active program of consultation with the Council and the SHPO with respect to major programs and projects that implement aspects of the approved GMP. NPS will submit major contemplated actions to the Council and the SHPO for review.

2. Specifically: It is further recognized that it is mutually beneficial to avoid repetitive consultation, especially for routine or reoccurring preservation maintenance or restoration efforts that incrementally fall within the scope of the approved GMP. To this end, the parties agree to the following consultation requirements described in the following chart: ~~Specific consultation requirements, stipulations, or exclusions are described in Section IV.C. of this agreement:~~

ITEM	CONSULTATION REQUIREMENT
Prepare historic resource studies, archeological studies, implementation plans, and others as foundations for preservation or rehabilitation of park resources	SHPO review
Develop a forest restoration plan	SHPO review
Remove Valley Creek dam and dams in other creeks	SHPO review
Ground disturbing activities to restore Valley Creek and other creeks	SHPO review
Develop a park-wide cultural landscape treatment plan	SHPO review
Rehabilitate cultural landscape at Muhlenberg's Brigade and the Grand Parade	SHPO review
Project-related a Archeological investigations, <u>except as stipulated in IV.C.1.c</u>	SHPO review (as stipulated below)
Preserve and R ehabitate historic structures	SHPO review of historic structure reports (HSRs) and actions (as stipulated below)in <u>IV.C.1.j</u>
Demolish historic structures <u>as noted in Appendix D</u>	SHPO review, of mitigation.

ITEM	CONSULTATION REQUIREMENT
of the GMP/EIS, limited to (including <u>P.C. Knox Bath House, Blair House Smelting Shed/Outbuilding, Boyer Barn, Haney House, Haney Garage, Nichols House, Nichols Garage, Robert McCurdy House, Robert McCurdy Garage, David McCurdy House, David McCurdy Garage, Samuel Brittain Sr. House, Rose Cottage, Midgely Garage, Evans House, Evans Garage, Wallace House, and the Maintenance buildings.)</u>	<u>All contributing structures were physically surveyed and described during the List of Classified Structures Field Inventory. To mitigate the adverse effect of demolition of these contributing historic structures, scaled, face-on photographs of each façade of each structure will be taken. A set of these photographs will be provided to the SHPO.</u>
Establish new trail segments; establish pedestrian bridges over Valley Creek and the Schuylkill River	SHPO review
Design and implement a new park gateway at the intersection of US 422 and PA Route 23	SHPO review
Design and implement traffic elements identified in the GMP	SHPO review as stipulated below <u>in IV.C.1.f</u>
Siting and design of a relocated maintenance facility and ranger station, unless sited in adaptively reused modern structure	SHPO review

C. Park Specific Stipulations -- Programmatic Exclusions:

0.1. Conformance with GMP: In addition to the stipulations listed in IV.A, and consistent with Stipulation IV.D., V.B., and VI.C. of the Nationwide Programmatic Agreement, all cultural resource management proposed actions in the proposal adopted by NPS in the approved GMP/EIS will be treated as Programmatic Exclusions, subject to the following conditions and/or stipulations:

- a. Clearing and/or Thinning of trees:** Clearing and/or thinning of trees to restore viewsheds among Redoubts 1, 2, 3, 4, the Star Fort, and Stony Battery for interpretive purposes will not require additional SHPO review. Clearing and/or thinning of trees to preserve earthworks will not require additional SHPO review. Clearing of trees surrounding the quarries on the Grand Parade will not require further SHPO review. It is mutually understood that tree clearing that is not described in the GMP and that totals over 20 acres in any location will trigger SHPO review.
- b. Planting of Trees:** Replacement of trees that contribute to the commemorative landscape will not require SHPO review. Adding or augmenting tree screens along the Pennsylvania Turnpike or US 422 will not require further SHPO review. Implementation of the future cultural landscape treatment plan will not require further SHPO review.

- c. **Archeological Investigations:** In general, NPS studies (funded or sanctioned) archeological inventory surveys, site reports, and SAIP maps, archeological investigations of historic or prehistoric archeological sites within the park’s legislative boundary including routine salvage activities, investigations of a short duration (two weeks or less) or archeological testing/mitigation resulting from routine “compliance” testing associated with maintenance or resource management activities, will not be subject to further SHPO review. Section 106/NEPA compliance-driven archeological investigations of historic resources (historic structures and archeological sites) designed to maintain or rehabilitate these will not be subject to further SHPO review, provided a research design has been prepared and approved by the Superintendent. Stabilization and preservation of archeological sites will not be subject to SHPO review.
- d. **Curation and Storage of Archeological Remains:** NPS may enter into cooperative agreements with private museums, educational organizations, or other nonprofit or governmental entities to de-accession, warehouse, or otherwise provide for the long-term storage of both prehistoric and historic archeological collections with such cooperating or regional repositories. Agreements and plans consistent with the goals and objectives of the park GMP will not be subject to SHPO review.
- e. **Collections and Artifacts:** Relocation implementation plans for the park collections and archives will not be subject to SHPO review.
- f. **Historic Trails and Roads:** Restoration or rehabilitation of historic trails and roads will not require SHPO review. The closing of park tour roads to vehicular traffic will not require SHPO review. Traffic calming measures as described in the GMP will not require further SHPO review. Removal of County Line Road will not require further SHPO review.
- g. **Monuments:** Unless contemplated monument restoration treatment extends significantly beyond that of routine cleaning or repairing (i.e. restoration requires the advice of a professional monument conservator or non-Service consultant for treatment recommendations) restoration or rehabilitation of individual monuments will not be subject to further SHPO review.
- h. **Partner Agreements:** Cooperative agreements partners for GMP-sanctioned programs and activities including agreements for the adaptive reuse of historic structures for non-profit undertakings such as employee housing, visitor contact, or museum/educational facilities will not be subject to SHPO review.
- i. **Historic Structures:** In general, rehabilitation of exteriors/interiors of historic buildings to provide a better means of interpretation or facilitate park management goals will not be subject to further SHPO review.
- j. **Historic Buildings/Features/Landscapes:** Preservation, restoration, or rehabilitation for adaptive reuse of cultural resources for interpretive or administrative purposes and that are consistent with the GMP are not subject to SHPO review. With the exception of the Hospital Hut, huts are not historic structures, and maintenance or removal of huts will not be subject to SHPO review. The filling of quarries on the Grand Parade to their historic contour

will not be subject to further SHPO review. At the park, this would include actions that are consistent with the management prescriptions identified in the approved GMP and subsequent cultural landscape treatment plan for preserving and maintaining the park and its component landscapes. In addition, actions to preserve features that contribute to the battlefield landscape may be reviewed under the terms of this section

- k. Leasing/Employee Housing:** The use of historic structures on the List of Classified Structures and currently used or identified in the GMP to be used for leasing and/or employee housing will not be subject to further SHPO review.
- l. Historic Preservation Agreements:** Historic preservation agreements (including deed restrictions where appropriate) with individual owners of historic buildings or improved properties to support historic preservation and limit inappropriate development will not be subject to further SHPO review.

2. For any undertaking listed above for which an adverse effect is predicted, NPS and the SHPO would discuss and come to a letter agreement on suitable mitigation. In some cases, at the request of either NPS or the SHPO, formal Section 106 consultation under 36 CFR 800.6 would be instituted.

V. DOCUMENTATION OF ACTIONS:

- A. Documenting “Undertakings”:** Park related “undertakings” that may have an effect on cultural resources will be appropriately documented in accordance with section VII of the Nationwide Programmatic Agreement. The park 106/NEPA Coordinator will maintain active files and the park archives will retain archived copies of all review documents.

VI. COOPERATION AND COMMUNICATIONS:

- A. 106/NEPA Committee:** Subject to oversight by the park Superintendent, the chair of the park Committee (or other designated individual) may function as the park Section 106 Coordinator and may be empowered to: 1) decide when and what specialists should review a given undertaking; 2) work with CRM advisors to provide Section 106 training to park staff; 3) initiate the identification of projects as undertakings, coordinate review of potential undertakings to allow sufficient time for Section 106 compliance to be completed in a timely manner and ensure involvement of appropriate cultural resource management specialists, interested persons and the public as appropriate; 4) decide whether an undertaking is a programmatic exclusion and document this for the Superintendent’s approval; 5) log and track Section 106 activities and documentation and maintain park files on Section 106 documentation including all “Assessment of Effect” forms; 6) maintain close coordination with the SHPO in executing provisions of this agreement; and 7) submit appropriate Section 106 documentation to the SHPO and Council as required in 36 CFR Part 800 for all undertakings (except programmatic exclusions stipulated above and those in the Nationwide Programmatic Agreement).
- B. Park /SHPO:** In an effort to expand and facilitate cooperation, coordination, and communication between NPS and the SHPO, it is mutually agreed to meet annually to discuss the compliance process, receive briefings on the status of various ongoing or pending projects, review the list of subject matter specialists sitting on the park 106/NEPA Review

Committee, and discuss projects and activities that may require notification/consultation with the Council.

- C. Park/SHPO/Council:** Council may monitor activities carried out pursuant to this Agreement, and Council will review such activities upon request. Upon request, the park Superintendent will be considered an "interested party" under 36 CFR Part 800 for purposes of undertakings by other Federal and state agencies and Indian tribes that may affect the park, including planned state or federal undertaking in areas in and around parks, in conformance with the "Programmatic Agreement Between the National Park Service and the Pennsylvania State Historic Preservation Officer Regarding the Implementation of Federal Consistency Under Public Law 101-377" dated July 21, 1994.
- D. Native American Consultation/Discovery of Human Remains:** NPS will adhere to relevant provisions of the Native American Graves Protection and Repatriation Act (P.L. 101-601) and will follow consultation/implementation guidelines established in "Appendix R: NAGPRA Compliance" of *Director's Order #28* (dated 11 June 1998).
- E. Public Participation:** Through such other means as NPS may consider appropriate, the park will notify the public of undertakings subject to SHPO and/or SHPO/Council review. For such projects, NPS will make available to the public any documentation about such projects or programs, including information on the identification and evaluation of cultural resources and the proposed treatments of these resources. Council and/or SHPO may elect to participate in consultation for highly controversial projects.

VII. RELATIONSHIP TO OTHER EXISTING AGREEMENTS:

- A.** Except as stipulated above, nothing in this agreement supercedes provisions of the Nationwide Programmatic Agreement (as amended) or any other implementation agreement between Council, the SHPO, or the NPS. Signature and implementation of this Agreement does not invalidate park-specific Memoranda of Agreement negotiated for Section 106 purposes prior to the effective date of this agreement.

VIII. POST REVIEW DISCOVERIES:

- A. In General:** In the event that a previously unidentified archeological resource is discovered during ground disturbing activities, NPS shall immediately notify SHPO. All construction work involving subsurface disturbance will be halted in the area of the resource and in the surrounding area where further subsurface remains can be reasonably expected to occur. The NPS and the SHPO, or an archeologist approved by both agencies, immediately will inspect the work site and determine the area and nature of the affected archeological property. Construction work may then continue in the project areas outside the site area. Within two (2) working days of the original notification of discovery, NPS, in consultation with the SHPO, will determine the National Register eligibility of the resource. If the resource is determined to meet the National Register criteria (36 CFR Part 60.6), the NPS will ensure compliance with Section 800.13 of Council regulations. Work in the affected area shall not proceed until either (a) the development or implementation of appropriate data recovery or other recommended mitigation procedures, or (b) the determination is made that the located remains are not eligible for listing on the National Register. In addition, human remains and associated funerary objects encountered during the course of actions taken because

of this agreement shall be treated in a manner consistent with the provisions set forth in the Native American Graves Protection and Repatriation Act.

IX. DISPUTE RESOLUTION:

A. In General: Parties to this Agreement agree to resolve disputes in strict conformance with provisions set forth in Section XI (Dispute Resolution) of the Nationwide Programmatic Agreement.

X. MONITORING, DURATION, TERMINATION, AND EXPIRATION:

A. In General: At any time, parties to this Agreement may determine whether revisions or amendments to this Agreement are needed. If parties to this Agreement determine that revisions or amendments are needed, the parties will consult in accordance with 36 CFR Part 800.13 to consider such amendment, and upon the unanimous decision of all parties, such amendments will be implemented.

B. Duration of the Programmatic Agreement: This Programmatic Agreement will continue in full force and effect until ten (10) years after the date of the last signature. At any time in the six-month period prior to such date, the NPS may request the signatory parties to consider an extension or modification of this Programmatic Agreement. No extension or modification will be effective unless all parties to the Programmatic Agreement have agreed with it in writing.

C. Failure to Carry Out Terms of this Agreement: In the event that NPS does not carry out the terms of this Agreement, the National Park Service will comply with the terms of the Nationwide Programmatic Agreement, or 36 CFR Section 800.4 through 800.6 as applicable with regard to individual undertakings that otherwise would be covered by the terms and provisions of this Programmatic Agreement.

D. Termination: Termination of this agreement will follow the procedures laid out in Section XII (B) of Nationwide Programmatic Agreement.

E. Execution and Implementation: Execution and implementation of this Programmatic Agreement evidences that the park has satisfied its Section 106 responsibilities for all individual undertakings of the program.

~~ADVISORY COUNCIL ON HISTORIC PRESERVATION~~

BY: _____ **Date:** _____

PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICER

By: _____ **Date:** _____

NATIONAL PARK SERVICE, Valley Forge National Historical Park

By: _____ **Date:** _____

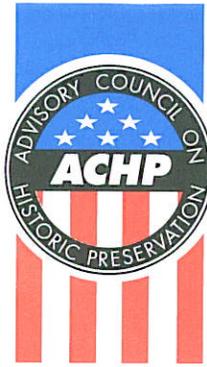
Incorporated by Reference:

Nationwide Programmatic Agreement
36 CFR Part 800—Protection of Historic Properties

Appendix C: Agency and Substantive Correspondence

The following pages provide full copies of the correspondence received from federal, state, and local agencies. Correspondence from individuals is only included if it contains a substantive comment. Additional individual correspondence is available for review upon request. As noted above, all substantive comments have been addressed in this *Abbreviated Final GMP/EIS*.

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Preserving America's Heritage

April 19, 2007

Mr. Mike Caldwell
Superintendent
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406-1009

Ref: Development of Programmatic Agreement for Proposed General Management Plan

Dear Mr. Caldwell:

The Advisory Council on Historic Preservation (ACHP) received your notification of intent to develop a Programmatic Agreement (PA) for the proposed General Management Plan (GMP) for Valley Forge National Historical Park. We appreciate the ongoing and informative dialogue that has occurred with Ms. Deirdre Gibson. Based upon the information provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to finalize this PA is needed. Should circumstances change and you determine that our participation is required, please notify us.

In response to your request for comments, we offer the following request. We would ask the park to consider clarifying the language in the draft PA under stipulation IV.B.2., 'Park Specific Stipulations- Consultation Requirements,' to specify which historic buildings will be demolished and which archaeological investigations will be conducted without ACHP, or at times, State Historic Preservation Officer (SHPO) review pursuant to this PA. We believe this clarification is necessary to prevent the inability of the SHPO and/or the ACHP to comment on any future potentially similar undertakings not currently envisioned in this agreement.

Pursuant to 36 CFR 800.6(b)(1)(iv), you will need to file the final executed PA, developed in consultation with the Pennsylvania SHPO and any other consulting parties, and related documentation with us at the conclusion of the consultation process.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 809 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

Thank you for providing us with this notification. If you have any questions or require the further assistance of the ACHP, please contact me at 202-606-8583, or by EMAIL at kfanizzo@achp.gov.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Y. Fanizzo". The signature is written in black ink and is positioned above the typed name.

Kelly Yasaitis Fanizzo
Historic Preservation Specialist
Federal Property Management Section
Office of Federal Agency Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

April 5, 2007

Mr. Michael A. Caldwell
U.S. Department of the Interior
National Park Service
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406-1009

Re: Valley Forge National Historical Park Draft General Management Plan/Environmental Impact Statement (CEQ #20070052)

Dear Mr. Caldwell:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan/Environmental Impact Statement for Valley Forge National Historical Park. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information.

Surface Waters and Groundwater

As stated on page 3-34, "A total of 34.32 miles of the Schuylkill have been defined as impaired by the DEP, including the three miles of river flow through the park. The listing is due to PCB and chlordane contamination from outside the park." Page 3-35 makes note that Valley Creek is a "...is 303(d) listed by the commonwealth because of PCB contamination, turbidity, sedimentation, nutrients, and flow alteration." Thus, it was determined in the DEIS that the establishment of new pedestrian/bicycle bridges over the Schuylkill River and Valley Creek would result in some soil disturbance at the landings and piers (page 4-32/4-34). As a result, "The construction would disrupt the river bottom, potentially introducing a high level of sedimentation and disruption to river hydrology." (Page 4-38).

EPA would like the FEIS to assess the impacts to these waters and sediments related to the two proposed bridges; including the upgrade and widening of the existing US 422 bridge since the Betzwood Bridge replacement and the widening of US 422 bridge cross the Schuylkill River and its associated floodplain. (Page 4-41). In addition, the FEIS should discuss fish, herpetological, and mammal passages, where appropriate. Any crossings of streams,



wetlands, etc. should also consider oversized natural bottom culverts to minimize impacts and discuss if the crossings can be spanned without piers. Mitigation for impacts should also be discussed in the FEIS.

The National Park Service should use the new PADEP stormwater manual and/or indicate its use in the FEIS.

Floodplains

Page 4-41 states that, "The increase in impervious surface associated with the widening of the turnpike would have long-term, major, adverse impacts to the floodplains of Valley Creek and its tributaries and to that of Trout Run, if a maximal use of best management practices for stormwater management is not considered, including measures to infiltrate stormwater and slow its rate to prevent scouring." The DEIS also states, "The current proposal for the PA Route 29/PA Turnpike slip ramp calls for dumping of all stormwater into the Warner Quarry, from which water is pumped into a tributary of Cedar Creek. No infiltration or control of volume is proposed. This proposal, if implemented, would have long-term, major, adverse impacts to the floodplain of Valley Creek." The National Park Service should indicate in the FEIS whether the new PADEP stormwater manual has been used.

As noted on page 4-42, "Several failing dams within the park would also be removed." It is also stated, that "By eliminating these additional man-made structures from within the floodplain, natural hydrologic flows should return and sedimentation build up would be minimized, a long-term, moderate, beneficial impact." The DEIS did not specify the locations of the dams to be removed, namely Valley Creek, Meyer's Run, Colonial Springs, and Fatlands dams (Page 4-38). Additionally, the FEIS should address the potential impact that this action may have on water quality and the potential to disrupt contaminated soils within the stream that may result from a change in hydrologic flow, particularly within Valley Creek.

Wetlands

The wetlands discussed in Section 3.4.7 should be quantified and labeled on a map as Figure 3-4 does not adequately support the text. For example, page 3-39, states that, "The largest wetland in Valley Forge is located within the floodplain on the south bank of the Schuylkill River, between the railroad tracks and the river." Figure 3-4 should clearly depict/label the exact location of this wetland (and others referenced in Section 3.4.7). In addition, the landmarks mentioned in the text to pinpoint wetlands locations should also be indicated on the map (i.e. railroad tracks, Port Kennedy Train Station, Maurice Stephens House, General Varnum's Quarters, Mount Misery, Lord Stirling's Quarters, Fatland Island, etc.

Page 4-45, "All the action alternatives propose construction of pedestrian/bicycle crossings of the Schuylkill River and Valley Creek." "Depending on the north side location for the Schuylkill River crossing, there could be a long-term, minor, adverse impact from a new bridge pier." What would be the approximate area of wetlands impact and what kinds of wetlands have the potential to be impacted? In addition, the small wetland within the Grand Parade should be delineated and size indicated.



Vegetation

As stated on page 4-50, "Rehabilitation of the interpretive focus areas and re-establishment of some vistas would result in the removal/modification of approximately 20 acres of vegetation, a long-term, moderate, adverse impact. However, approximately 15 acres of this vegetative cover would remain, converting from forest to meadow habitat, a long-term, moderate, beneficial impact." The FEIS should specify where the forest removal will take place indicating the age and type of trees removed as well as noting any impact to encampment-period trees, state champion and/or historic trees? In addition to providing the present composition of the area, the FEIS should discuss if habitat loss has been accounted for with particular attention to impacts on sensitive species.

Miscellaneous

Table 2-5, Summary of Environmental Consequences, would be more useful if it quantified (where possible) the environmental impacts described in Chapter 4: Environmental Consequences.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,


William Arguto
NEPA Team Leader

Enclosure





U.S. Environmental Protection Agency National Environmental Policy Act (NEPA)

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Environmental Impact Statement (EIS) Rating System Criteria

[National Environmental Policy Act Home](#)

EPA has developed a set of criteria for rating draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft EIS.

[Basic Information](#)

- [Rating the Environmental Impact of the Action](#)

[Where You Live](#)

- [Rating the Adequacy of the Draft Environmental Impact Statement \(EIS\)](#)

[Newsroom](#)

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

[Environmental Impact Statements - Notices of Availability](#)

- **LO (Lack of Objections)** The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- **EC (Environmental Concerns)** The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- **EO (Environmental Objections)** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:
 1. *Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;*
 2. *Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;*
 3. *Where there is a violation of an EPA policy declaration;*
 4. *Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or*
 5. *Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.*

[Submitting Environmental Impact Statements](#)

[Obtaining Environmental Impact Statements](#)

[EPA Comments on Environmental Impact Statements](#)

[EPA Compliance with NEPA](#)



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, Pennsylvania 16801-4850



May 29, 2007

Deirdre Gibson
U.S. Department of the Interior
National Park Service
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406-1009

RE: USFWS Project #2007-1555

Dear Ms. Gibson:

This responds to your April 25, 2007, letter requesting information on fish and wildlife resources within the area affected by the proposed General Management Plan prepared for the Valley Forge National Historical Park, located in Chester and Montgomery Counties, Pennsylvania. The following comments are provided pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) to ensure the protection of federally endangered and threatened species, and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*) to ensure protection of fish and wildlife resources.

Federally Listed and Proposed Species

The proposed project is within the known range of the bog turtle (*Clemmys muhlenbergii*), a species that is federally listed as threatened. Bog turtles inhabit shallow, spring-fed fens, sphagnum bogs, swamps, marshy meadows, and pastures characterized by soft, muddy bottoms; clear, cool, slow-flowing water, often forming a network of rivulets; high humidity; and an open canopy. Bog turtles usually occur in small, discrete populations occupying suitable wetland habitat dispersed along a watershed. The occupied "intermediate successional stage" wetland habitat is usually a mosaic of microhabitats ranging from dry pockets, to areas that are saturated with water, to areas that are periodically flooded. Some wetlands occupied by bog turtles are located in agricultural areas and are subject to grazing by livestock.

To determine any potential effects of the proposed project on bog turtles and their habitat, begin by identifying all wetlands in, and within 300 feet of, project-related activities. The project area includes all areas that will be permanently or temporarily affected by any and all project features. The area of investigation should be expanded when project

effects might extend more than 300 feet from the project footprint. For example, the hydrological effects of some projects might extend well beyond the project footprint due to the effects that impervious surfaces or groundwater pumping may have on the hydrology of nearby groundwater-dependent wetlands. Wetlands should be included on a map showing existing as well as proposed project features.

If someone qualified to identify and delineate wetlands has, through a field investigation, determined that no wetlands are located in or within 300 feet of the project area (or within the expanded investigation area, as described above), it is not likely that your project will adversely affect the bog turtle. If this is the case, no further consultation with the Fish and Wildlife Service is necessary, although we would appreciate receiving a courtesy copy of the wetland investigator's findings for our files.

If wetlands have been identified in or within 300 feet of the project area (or in an expanded investigation area, as described above), their potential suitability as bog turtle habitat should be assessed, as described under "Bog Turtle Habitat Survey" (Phase 1 survey) of the enclosed *Guidelines for Bog Turtle Surveys*. Survey results should be submitted to this office for review and concurrence. A Phase 1 field form and report template are available upon request.

Due to the skill required to correctly identify potential bog turtle habitat, we recommend that the Phase 1 survey be done by a qualified surveyor (see enclosed list). If the Phase 1 survey is done by someone who is not on this list, it is likely that a site visit by a Fish and Wildlife Service biologist will be necessary to verify their findings. Due to the limited availability of staff from this office, such a visit may not be possible for some time. Use of a qualified surveyor will expedite our review of the survey results.

If potential bog turtle habitat is found in or near the project area, efforts should be made to avoid any direct or indirect impacts to those wetlands (see enclosed *Bog Turtle Conservation Zones*). Avoidance of direct and indirect effects means no disturbance to or encroachment into the wetlands for any project-associated features or activities. Adverse effects may also be anticipated to occur when lot lines include portions of the wetland; when an adequate upland buffer is not retained around the wetland (see *Bog Turtle Conservation Zones*); or when project features affect the hydrology of the wetland.

We recommend that if potential habitat is found, you submit (along with your Phase 1 survey results) a detailed project description and detailed project plans documenting how direct and indirect impacts to the wetlands will be avoided. If adverse effects to these wetlands cannot be avoided, a more detailed and thorough survey should be done, as described under "Bog Turtle Survey" (Phase 2 survey) of the *Guidelines*. The Phase 2 survey should be conducted by a qualified biologist with bog turtle field survey experience (see enclosed list of qualified surveyors), and survey results should be submitted to this office for review and concurrence.

Aquatic Resources

National Wetlands Inventory maps indicate that palustrine emergent and palustrine forested wetlands occur within the boundaries of the proposed project. Although NWI maps were prepared using aerial photography, and are therefore not always completely accurate, the Soil Survey for Montgomery and Chester Counties also indicate that wetlands are likely to occur there. The following soils occur within the boundaries of the proposed project area: Melvin, Bowmansville, and Croton, silt loams (hydric inclusions); Chewacla, Glenville, Lindside, Beltsville, Lawrenceville, Rowland, Raritan, and Readington silt loams (soils containing hydric inclusions); and shale/sandstone- and schist/gneiss-oriented made land (soils containing hydric inclusions). These soil types are typically found in low flats, depressions, swales and drainageways, and may indicate the presence of wetlands on the site. Any final determination of whether wetlands are present on the proposed project site should include a site visit by a qualified individual trained in wetland identification. Furthermore, the proposed project area includes perennial streams. We recommend that you avoid, and minimize unavoidable impacts to, aquatic resources when carrying out any planning and construction work under this management plan.

The National Park Service has a responsibility under Executive Order 11990 (Protection of Wetlands) to "provide leadership and take action to minimize the destruction, loss or degradation of wetlands . . . in carrying out the agency's responsibilities for . . . providing federally undertaken, financed, or assisted construction and improvements." Any development should be designed to leave streams and wetlands in their natural state, and include the use of appropriate upland buffers. Such measures help to reduce development impacts in important aquatic habitats, and prevent downstream flooding and water quality degradation.

Work in streams and wetlands require permits from the Pennsylvania Department of Environmental Protection and/or the Army Corps of Engineers. We suggest that you contact the DEP and the Corps at the addresses found in the enclosed list for information on permit requirements. Please be advised that the Service generally recommends that the Corps and DEP not grant permits to destroy streams and wetlands.

To avoid potential delays in reviewing your project, please use the above-referenced USFWS project tracking number in any future correspondence regarding this project.

If you have any questions regarding this matter, please contact Pam Shellenberger of my staff at 814-234-4090.

Sincerely,



David Densmore
Supervisor

Enclosure

cc:

Readers file

ES file - active

PAFO - Kagel

Filename: Y:\FROFFICE\Drafts\Drafts 2007\valley forge EIS.doc

Enclosure includes

1) State and Federal Regulatory Agency List

Enclosures :

BT survey guidelines

list of qualified BT surveyors

Phase 1 field form

Phase I report - template

BT conservation zones



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

April 9, 2007

Mike Caldwell
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406-1009

TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: ER 98-0915-029-B
NPS: Draft General Management Plan/Environmental Impact Statement and Draft
Programmatic Agreement, Valley Forge National Historical Park,
Chester/Montgomery Counties

Dear Mr. Caldwell:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named documents in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

We concur with the findings in the Draft General Management Plan/Environmental Impact Statement (GMP/EIS). Effects to historic properties appear to be the same in Alternatives B and C. While we support Alternative C, the Park's preferred alternative, in terms of buildings, landscape features, and archaeology resources, we are concerned with the proposed demolitions of fifteen buildings. According to the list in Appendix A of the Contextual Documentation and Cultural Landscape Plan, most of these buildings are contributing resources.

Alternative C will have an adverse effect on historic properties; therefore a draft Programmatic Agreement was included with the draft GMP/EIS. The framework for consulting under Section 106 and resolving effects to historic properties is well documented in these reports.

We have reviewed the draft Programmatic Agreement and generally concur with the stipulations. However, we have one concern. There is no process outlined when a project results in an adverse effect finding, such as the demolition of a building or when rehabilitation cannot meet the *Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings*. This can be accomplished by outlining the procedures in 36 CFR Part 800.6 in the agreement.

Page 2
M. Caldwell
April 9, 2007

Finally, as this is a public document with different interested parties reviewing it, it would be helpful if acronyms used in Appendix D tables are explained and contributing status of the buildings included.

Thank you for providing us the opportunity to comment. If you need further information in this matter please consult Ann Safley at (717) 787-9121.

Sincerely,


Douglas McLearen, Chief
Division of Archaeology & Protection

DMcL/ras



Pennsylvania Department of Environmental Protection

2 East Main Street
Norristown, PA 19401
May 11, 2007

Southeast Regional Office

Phone: 484-250-5940
Fax: 484-250-5943

Ms. Deidre Gibson
Valley Forge National Historic Park
1400 North Outer Line Drive
King of Prussia, PA 19406

Dear Ms. Gibson:

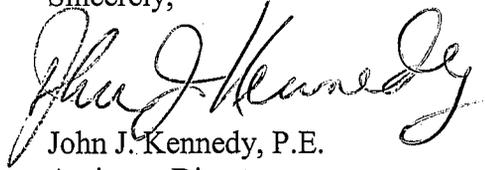
The PA Department of Environmental Protection (DEP) has reviewed the January 2007 *Draft General Management Plan/Environmental Impact Statement*, and we have the following comments:

1. Waste Management: We could find no reference to how the park will manage waste generated by routine park operations. As a minimum, all waste generated must be managed in accordance with the Pa. Solid Waste Management Act (Act 97) and promulgated regulations 25 Pa. Code Chapters 260a through 299, guidance and policies.
2. As you know, DEP has been working closely with the park and the U.S. Department of Interior to resolve the asbestos issues in the park. We have the following comments regarding the asbestos related aspects in the report:
 - a. Page 1-25. First paragraph, second sentence. Include asbestos manufacturing in the discussion of historic industries in the park.
 - b. Pages 1-27 and 1-28. Section 1.6.1, Asbestos Release Site. Sixth paragraph. This section can be updated now that the ROD and Proposed Plan are final and have gone through public review.
 - c. Page 1-31. Section 1.6.5, Schuylkill Valley Metro, etc. This section talks about reuse of the Port Kennedy depot as part of the proposed Schuylkill Valley Metro. From other discussions, I was under the impression that NPS wanted to move the park offices to this area
3. Miscellaneous comments:
 - a. "Commonwealth of Pennsylvania" should be capitalized throughout the report.



- b. Although the NPS expects an eventual increase in visitors after they begin collecting a park-wide fee, local visitors, especially the 66 percent that use the park for active recreation may reduce their visits by imposing a fee to enter. However, the General Management Plan will increase visitors' knowledge of the historical significance of the park.

Sincerely,

A handwritten signature in cursive script, appearing to read "John J. Kennedy".

John J. Kennedy, P.E.
Assistant Director
Southeast Regional Office

Re 30 (GJS07)131



THE COUNTY OF CHESTER

**COMMISSIONERS**

Carol Aichele
Donald A. Mancini
Patrick C. O'Donnell

RONALD T. BAILEY, AICP
Executive Director

PLANNING COMMISSION

Government Services Center, Suite 270
601 Westtown Road
P.O. Box 2747
West Chester, PA 19380-0990
610-344-6285
Fax: 610-344-6515

April 9, 2007

Deirdre Gibson
Chief of Planning
Valley Forge National Historic Park
1400 North Outer Line Drive
King of Prussia, PA 19406

Re: Draft General Management Plan (GMP)

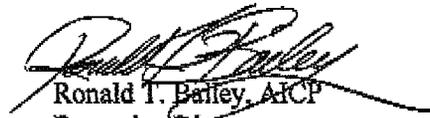
Dear Ms. Gibson:

Thank you for providing the Chester County Planning Commission (CCPC) with a copy of the *Valley Forge National Historic Park Draft General Management Plan/Environmental Impact Statement* for our review. I am pleased that your organization is pursuing a comprehensive approach to managing parkland resources in Chester County. The document is well written and has excellent maps and graphics.

I appreciate that the GMP references the possible future trail connection to Wilson Farm Park via the old Wilson Road underpass beneath the Pennsylvania Turnpike. I am also pleased with the extensive discussion given to transportation issues, and the 18 transportation options, as summarized in Figures 2-1, 2-3 and 2-4. Many of the roadways in the park are located in Montgomery County. However, major changes or improvements to these roadways can be expected to impact the roadway network in nearby Chester County. As a result, we would like to request that you coordinate with the Chester County Planning Commission before you finalize these plans in the final GMP. Although we understand that your review period for the Draft GMP ends April 10, 2007, we would still like to keep open the option of commenting on transportation issues throughout the spring and summer.

Again, let me congratulate you on this excellent and thorough document. If you have any questions or would like more information, please feel free to contact Jake Michael at 610-344-6285.

Sincerely,



Ronald T. Bailey, AICP
Executive Director

RTB/JM/kp

cc: Mimi Gleason, Tredyffrin Township
John Mikowchok, Chester County Parks and Recreation Department
Lee Whitmore, CCPC
Carol Stauffer, CCPC
Jake Michael, CCPC



Lower Providence Township

100 Parklane Drive • Eagleville, PA 19403
Phone: (610) 539-8020 • Fax: (610) 539-6347
www.lowerprovidence.org

April 13, 2007

Michael A. Caldwell, Superintendent
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406-1009

Dear Mr. Caldwell,

Thank you for providing the Township the opportunity to review the draft General Management Plan/Environmental Impact Statement for Valley Forge National Historical Park. Lower Providence Township is fortunate to be a neighbor to this national treasure and values its relationship with the Park.

The Action Alternatives outlined in the Plan, in particular Alternative C, offer the opportunity for an enhanced visitor experience that will provide a better understanding of the park's historical significance. Additionally, this Alternative encourages the continuation of recreational uses and we are pleased to note that it calls for increased connectivity to the regional trail system, including a link to the John James Audubon Center at Mill Grove in Lower Providence.

We look forward to continuing our work with you on appropriate transportation improvements that would further benefit the Park. Lower Providence Township supports the efforts to develop the management improvements listed in the Plan's Alternative C and looks forward to their realization.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Dunbar", is written over a horizontal dashed line.

Joseph C. Dunbar, C.P.M.
Township Manager

Cc: Lower Providence Township Board of Supervisors
Sen. John C. Rafferty Jr.
Rep. Carole A. Rubley
Rep. Michael Vereb



MONTGOMERY COUNTY PLANNING COMMISSION

box 311 • norristown • pennsylvania • 19404-0311 • 610-278-3722
office location: suite 201 • one montgomery plaza • swede & airy streets • norristown pa
FAX 610-278-3941 • Website www.montcopa.org/planning

April 9, 2007

Mr. Michael A. Caldwell
Superintendent
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406-1009

Dear Mr. Caldwell:

We have reviewed the copy of the Valley Forge National Historical Park General Management Plan/ Environmental Impact Statement that you had sent to us. We greatly appreciated our opportunity to participate in this planning process over the past four years, and are grateful to your staff for their willingness to meet with us during that time to coordinate on key issues.

Overall we concur with the selection of Alternative C as the preferred alternative. This alternative addresses the key goals identified in the plan and offers realistic recommendations that can be implemented over the time horizon of the plan. In this alternative, reasonable balances are established in the way in which the park functions as both a national historic treasure and a local open space refuge. In finalizing the plan, you may wish to consider our comments on Valley Creek, transportation improvements, cultural tourism and opportunities for partnership, and the American Revolution Center.

Valley Creek: The plan acknowledges that the issues associated with Valley Creek within the park cannot be addressed within the park boundaries. Instead, substantial changes to the hydrology of the watershed out side of the park must be made. The plan should acknowledge the development of the stormwater management plan for the Valley Creek currently being prepared by Chester County. This effort will result in a common set of standards for municipal stormwater management within the watershed. The watershed contains a number of organizations that are attempting to improve it including: the Valley Creek Trustee Council, Trout Unlimited, Valley Creek Restoration Partnership, Open Lands Conservancy, and Green Valleys Association. All of these organizations should be considered important partners in the park's efforts to address problems along the creek.

Transportation Improvements: The General Management Plan appears to include all of the transportation improvement measures that we have been working to implement. Your staff and consultants have worked very closely

Mr. Michael A. Caldwell

-2-

April 9, 2007

with our staff and others on creative ways to resolve traffic congestion in this area without compromising the park. We note that the summary map (Figure 2-12) lists various improvements proposed under Alternative C, yet it seems to omit the slip ramp proposed at Route 422 and Pawlings Road. It also does not depict the relocation of the maintenance depot and the refilling of the quarries.

Cultural Tourism and Opportunities for Partnership: The plan recognizes the importance of encouraging park visitors to also visit other nearby sites. The example action under this management objective addresses the need to work with managers of other Revolutionary War sites. In addition, the staff at the Valley Forge National Historical Park may wish to operate more broadly to establish relationships with all types of sites and tourist attractions within the area that are linked to Valley Forge. These facilities could include other parks or historic sites that address colonial times and the birth of the nation in addition to the Revolutionary War. Visitor preference research might be valuable to better understand what park visitors wish to experience and how other nearby facilities might also address their needs. With the changing demographics in our nation, we think that cultural tourism experiences involving several interconnected sites and facilities may be sought out by future visitors to our area. Organizing, packaging, and promoting these experiences will need cooperation between several parties. Montgomery County's Valley Forge Convention and Tourism Bureau may be a useful partner in identifying these opportunities for partnership.

American Revolution Center: The plan describes the current status of the relationship between the American Revolution Center and the National Park Service. At present there is no formal agreement between the parties and the general management plan does not address the potential impact of the American Revolution Center museum at its proposed new location. Montgomery County supports the American Revolution Center and recognizes that it will be a very important addition to the Valley Forge area visitor experience.

We look forward to an ongoing relationship through the implementation of this ambitious plan. Should you have any questions, please feel free to call our office at 610.278.3729.

Sincerely,



Michael M. Stokes, AICP
Assistant Director
Mstokes@montcopa.org
610.278.3729

Name: Paul W. Harris

Organization: Philadelphia Mountain Biking Association

Address: 307 Ginger Lane

Philadelphia, PA 19128

E-mail: paulharris70@comcast.net

Date Received: 4/2/2007

Type: Web form

I have ridden the Betzwood Park trails for over 10 years now, and they have continually stayed in great shape. I see no detriment from Mountain Bike riders, and it is a great way to stay in shape. After serving our country for ten years in the US Army as an officer, I find it is a great low impact exercise, that best of all gets me back to nature. Something I don't get enough of in our now more office oriented society. If anything, I think anyone who has spent as much time on the trails as I have, know that Mountain Bikers cover more terrain than other users, and are very effective at cutting down on undesirable park users, such as poachers, and users who treat this park as an outdoor sex market.

Having just witnessed a trail dissertation by "Trail Solutions", an independent trail consultant which the Fairmont Park Commission hired to assess their trails, I have seen no argument against a particular use, such as Mountain Biking, that held up to scientific scrutiny. Usually, problems with trails are their design. Another issue that the Fairmont Park discovered by monitoring trail use with hidden trail traffic counters, was that Mountain Biking, is now the biggest use group of their trails. In a democratic society, how would you justify excluding what is probably your largest use group, from a national treasure, that all citizens have a right to use, particularly those who have actually defended this country.

Name: Peter Novelli
E-mail: pete.novelli@hrh.com
Date Received: 4/5/2007
Type: Web form

I am a corporate executive and reside in Tredyffrin Township 1 mile from the park off Yellow Springs Road. I am also an avid runner, cyclist (road and mountain), and utilize the park extensively for recreation.

Comments in the report with respects to damage caused by mountain bikes frustrates me as horses clearly do far more damage that mountain bikes. All one needs to do is walk the off-road trails and see the damage horses hoof's do to the terrain; they leave 2"-4" depressions in the earth, and have made some of the trails in valley forge un-runable (the trails along both sides of the river, for example). I disagree with the report that mountain bikes are the cause of erosion in the park and rather feel that the use of horses on the trails cause much of the damage. If anything should be done curtail erosion of the unpaved trails in the park it should be the banning of horse use, not mountain bike use. The most significant contributing factor to erosion is obviously water run-off from rain.

Mountain bikers represent a significant percentage of individuals who would like to utilize the off-road trail system in VFNP. Certainly there must be a way that the trails can be shared by all users; mountain bikers, horse riders, runners, hikers etc., as they are in neighboring parks.

Name: Robert Waldo
Organization: PMBA
E-mail: www.phillymtb.org
Date Received: 3/5/2007
Type: Web form

I would also agree that there seems to be a pre-determined outcome that off road bicycling will not be permitted in Valley Forge Park. As an avid cyclist as well as a supporter of the preservation of our natural treasures, I find this unacceptable. I believe the Betzwood side of the park (which has been utilized as a recreational area for the entirety of my 44 years on this earth) contains a number of the trails that can be made, and in fact already are, sustainable as multi-user trails. With the assistance of organizations like IMBA and the Trail Care Crew, as well as the assistance of local cycling, hiking and equestrian organizations and their members, the trails can be made into a great resource for healthy outdoor activities for all to enjoy.

I would also say that the impact of off-trail biking was overstated in this report, and that further discussions regarding the areas that are sustainable should be held in order to refute those claims with factual information, and examples of how to maintain a sustainable trail system.

I too am a citizen and taxpayer who fully intends to utilize the park and it's resources in a responsible manner, and would welcome the opportunity to speak at a forum with the Park Superintendent, the Trails Supervisor and anyone else within VFNHP or the NPS who has the responsibility of maintaining the integrity of the land and it's historical treasures. I want my voice heard on this issue as much as anyone else with an interest in protecting the park and its resources. Valley Forge National Historical Park needs to give fair and serious consideration to opening these trails up for public usage, and an open public forum is needed to facilitate that debate.

It's been said before, and I'll say it again here, there needs to be a compromise regarding the trail system. Closing the system off in it's entirety to off road cycling is just not an option. It flies in the face of the NPS agreement with IMBA that embraces the sport of mountain bicycling as being consistent with NPS values, and takes away yet another potential resource for healthy activities in a part of the park that has always been utilized as a recreational area its' visitors.

Name: Rick Bullotta

Address: 610 Waterfall Way
Phoenixville, PA 19460

Date Received: 3/4/2007

Type: Web Form

I had the opportunity to read the proposed plan in great detail, and I can summarize my observations as follows:

There seems to be a predetermined outcome that off-trail biking will not be permitted in Valley Forge park. This is a completely unreasonable outcome, as there is ample opportunity for creating of sustainable trails in the park that can meet the needs of the *entire* user community, help counteract the ever-growing problem of obesity through active recreation (slow cycling on a paved path is not "active" enough for most athletes)

The impact of existing off-trail biking was SEVERELY exaggerated. Most of these trails are existing deer paths, and none that I am aware of are enhancing erosion or damage. The low-lying wetlands areas would be avoided by any responsible off-road cyclist (which comprise most of the community I am involved in). Sustainable trails *can* be created and managed, and we have the local resources to do so largely with volunteer effort.

- The local off-road cycling community represents a great source of volunteerism which has repeatedly been rejected by the NPS and VF. We have excellent working relationships with a number of state and county parks (IMBA, PATH, local teams). It is shameful that a similar relationship cannot be forged here.

- Life is about compromise, and clearly the current plan offers no room for compromise. As a frequent park user, taxpayer, citizen, and steward of the environment, this is simply unacceptable.

I would like to arrange a face-to-face meeting with VFNHP officials to discuss this situation. Otherwise, our only alternative would be to support the "no action" plan, and we will have no choice but to ask our elected officials to do so as well. This would represent a suboptimal outcome for all involved.

Comment on Draft General Management Plan/ Environmental Impact Statement for Valley Forge National Historical Park- January 2007.

Michael Bartlett

Date of comment: 4/10/07

Address: 560 American Ave Apt A212, King of Prussia, PA 19406

Home phone: 610-878-2236

Email address: michaellbartlett@yahoo.com

Commentator's relation to the park: grew up near the park, frequent visitor, Volunteer-in-Park(interpretation) for the last 6+ years.

Please refer to the GMP listed above when my comments list specific sections of the plan.

Chapter 2 pg 2-32 Cultural Landscape- I agree strongly with this paragraph as it is important to show the layers from all periods in order to keep a sense of continuity with the distant past and the recent past for future generations to enjoy.

Chapter 2 pg 2-32 Historic Structures- This paragraph refers the reader to Appendix D which has a listing of the structures, yet I could not find a map corresponding to the structures list. A series of maps showing the names and locations and historical significance of the structures should have been included. Not many of the names used for the houses are commonly known, so the reader has no frame of reference.

Chapter 2 pg 2-35 paragraph 4- I strongly agree with this paragraph, especially with option B, which preserves the landscape as is.

Chapter 2 pg 2-35 trails- last paragraph - a pedestrian/bicycle bridge across the Schuylkill River would mar the scenery. Surrounded by development on all sides, many visitors wish to remove themselves from the built environment, and the uninterrupted views of the river (nothing man made in sight) help to accomplish this. Two possible alternatives- obtain access along the river west of Washington's Headquarters all the way up to the Pawlings Road Bridge and build a ped/bike bridge next to the automobile bridge. The other alternative is to have a small ferry transport passengers and bicycles across the river in season for a small fee. The Ferry would allow crossing at certain points, but would not mar the landscape as a permanent structure would.

Chapter 2 pg 2-36 Traffic and Transportation- bullet point 4- ITS systems- the park should be careful in determining what type of technology to allow in the park, as unwanted intrusions by permanent cameras can degrade visitor enjoyment of the park.

Chapter 2 pg 2-37 last paragraph- the assumption that visitation would not significantly increase is not justification enough to decrease the number of law enforcement (LE) rangers. On the contrary, if the action alternatives are implemented, multiple buildings would be rented to outside businesses as a source of revenue (pg 2-39 "historic structures"). Employees working late and coming in contact with the visiting public could require additional LE presence in the park near these sites.

Chapter 2 pg 2-38 Fees- The priority to attempt to collect fees by the NPS at this site has led to profound changes in the park landscape. After reviewing the plan, and then reading this paragraph, I came to realize that a vast majority of the changes in both action alternatives are geared primarily to decrease free public access to the park. Example:

three parking lots easily accessible along route 23 are being removed, funneling visitors to the open lots, at least half of which would be a fee collection area. The parking lot on Yellow Springs road is being removed and relocated farther west near the park entrance. While this lot was small, it was at the base of Mount Misery, and is well shaded by the trees. The new lot will have a larger capacity, with picnic areas and bathrooms, but the visitor who wants to climb up a mountain in the shade will first have to park their car in the new lot, cross the road, then proceed 1,600 feet along an unshaded path to the original location of the lot to begin their hike(see fig 2-11). Instead of a relaxing stroll along the creek or a nice hike in the woods, the beginning and the end of the walk will be hot and difficult. The need to collect fees and keep the parking lots at those fee areas really seems to push the boundaries of the park service mission.

Chapter 2 pg 2-41 paragraph 5-Interpretation- In this paragraph, it states- "some learn best by exploring, discovering and doing; others through formal programs and directed experiences" In the action alternatives, especially C, the removal of personal vehicular travel from the main area of the park negates the exploration aspect of the learning experience. Instead, all interpretive experiences outside will be directed experience- shuttle bus from point A to point B then to C, with a return to A. Other vistas cannot be experienced by the visitors because they are on a shuttle and not free to explore the other areas of the park.(also interferes with the 4th criterion of the National Environmental Policy Act[section 101(b)])- {supports diversity and individual choice.}

Chapter 2 pg 2-41 paragraph 7- I disagree with the statement that Muhlenburg's Brigade is an easy walk from the Welcome Center. First, most visitors will be required to park at the lower lot at the welcome center, then walk up to the visitor center which is an increase in elevation of 10-20 feet. From the visitor center, the walk while only approximately 1200 feet long has an increase in elevation of 50 feet(see figure 3-3 topography). This increase is not too difficult for the young, but many visitors are seniors and some are handicapped. Those visitors would not find the walk relaxing and many could not make that walk.

Chapter 2 pg 2-42 paragraph 7- historic views- the plan does not show which views will be reestablished, and how this is to be done. While some areas will need to have trees removed, no indication of what vegetation will be affected was given. Future attempts to reestablish the views will need to clarify what areas are to be affected during the planning stage for public comment.

Chapter 2 pg 2-43 paragraph 1-Some authorized trails that are unmaintainable....would be eliminated. I strongly disagree with this statement. Which trails are in danger of being eliminated? If they are authorized trails, why can they not be maintained? This blanket statement seems too vague to be included in such a detailed document.

Chapter 2 pg 2-43 last paragraph-with vehicular use curtailed and shuttle buses running, will visitors get trapped at locations while waiting for the shuttle, and during an emergency will they unable to walk out or call for help?

Chapter 2 pg 2-46 paragraph 3 buildings- If the historical buildings are not damaging the mission of the park, yet have scenic value, they should be kept and not demolished.

I was unable to review the entire document, but those are my main points. Please keep the public informed whenever alterations to the landscape are to be considered.

Sincerely,

Michael Bartlett

NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Our National Parks for Future Generations®

April 10, 2007

Mr. Mike Caldwell
Superintendent
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406

Dear Mike:

Thank you for the opportunity to provide comments on issues related to Valley Forge National Historical Park's (NHP) draft General Management Plan. The following are submitted on behalf of the more than 330,000 members of the nonpartisan National Parks Conservation Association (NPCA). Founded in 1919, NPCA is America's only national private, nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the National Park System.

The National Park Service's (NPS) four years of engaging with the local and national constituency for Valley Forge NHP has resulted in a solid draft General Management Plan. Overall, we support the NPS' preferred alternative. Please see specific comments below.

Recreational use

Eight of every ten park visitors at Valley Forge are there primarily for recreation. Recreational users are a key constituency with tremendous potential as active park supporters. Recreational use throughout the park must be compatible with conserving and interpreting the natural, historic, and cultural resources of the park. We encourage the NPS to locate new nature trails and interpretive signage on the north side of the park in order to enhance recreational use, and to provide recreational users information about the park's history and significance.

Specific comments on the draft GMP:

1. We are pleased to see the draft GMP includes plans to fulfill the park's potential as a regional hub for low-impact recreational trails by strategically enhancing linkages with trails and resources outside of the park, including a trail connecting the park and Mill Grove that would promote nature study in the park; providing trail access and wildlife corridors across Rt. 422 and the Schuylkill River; and connecting to planned regional trails at Port Kennedy. We hope that South River Trail will be opened for general use, using the already established overpasses over the railroad tracks at Port Kennedy. We welcome proposals to improve safety and



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visibility for hikers and cyclists crossing Route 23 at Washington's Headquarters, and linking the Joseph Plumb Martin Trail and the Horseshoe Trail.

2. The NPS should analyze all trails in the park, their impact on visitor use, and their effect on park resources. The NPS should repair traditional established trails instead of simply closing them when they are damaged, explore establishing certain well-used "social" trails where consistent with protecting natural and historical resources; and restore wetlands in the desilting basin, removing illegal trails made by mountain bikers, but retaining historic trails made by desilting engineers (1945 –1955).
3. As is evident by the strong turnout at events like National Trails Day and National Public Lands Day, efficiently using volunteers is a great way to improve the park. We applaud the draft GMP calling for establishing a full-time volunteer coordinator position to work with park users, including mountain bikers, horseback riders, and hikers, to restore damaged trails and other projects to benefit the park.
4. While the NPS should encourage recreational users to use the park appropriately, they should also try to educate them about the historical importance of the park. We are glad the NPS has recognized Walnut Hill as a key interpretive area, but also think it would be valuable to establish interpretive waysides in the Fatlands area and along the Schuylkill River Trail.
5. We are unclear why the Valley Forge Signal Seekers, a model-airplane club, are allowed to hold a special-use permit when the use does not relate to the mission of the park and when no other group holds such a permit.
6. Many members of the local public expressed strong support at a number of meetings to discuss the draft GMP for charging visitors a fee. Because the NPS does not own the road through which visitors enter, making it extremely difficult to collect fees for the park at the entrance, it is important to study different options including an honor-based system where individuals pay when they park and an annual pass sold by an outside partner who would make those funds readily available to the park. Alternately, when the proposed shuttle bus is operational, a fee could be collected when visitors board.
7. As the draft GMP outlines, it is important that recreational activities do not come at the expense of the park's natural or historical resources. For example, the NPS should continue to prohibit off-trail biking. As the draft GMP directs, the NPS should evaluate all public activities for compatibility before they are allowed, and trails and roads should be routed in ways that do not encourage climbing of earthworks.

Use of the north side



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During the Continental Army's encampment, military activities including the commissary took place on both sides of the Schuylkill River. After the weather broke in the spring, General George Washington moved the Army north across Sullivan's bridge to camp before moving out in June 1778.

The north side of Valley Forge has an abundance of plants and wildlife. Trees remaining from the Colonial period include a White Oak at Walnut Hill, a 300-year old Sycamore next to the Walnut Hill springhouse, and a Hackberry just west of Sullivan's Bridge marker, located along the Schuylkill River Trail. The native fauna include fox, small reptiles, and a variety of fish in the Schuylkill River. Two hundred sixteen bird species have been spotted at Valley Forge, many of which reside, nest, or migrate through the North Side of the park.

Key principles: The NPS must fully integrate the human and natural history of the north side with the full suite of park programs.

Specific comments on draft GMP:

1. Walnut Hill and Fatlands areas should be connected through interpretive displays, self-guided tours, and an enhanced trails network.
2. As included in the draft GMP, a pedestrian bridge should connect the north and south side of the park over the Schuylkill River.
3. As outlined in the draft GMP, acquiring key remaining lands within the authorized boundary, including Saint Gabriel's field and Valley Forge Crossing, is of paramount importance. This should be achieved by working with interested parties using a variety of strategies including but not limited to in-fee acquisition and conservation easements. Once acquired, it is important that the Saint Gabriel field and its archeologically significant resources be protected as open space and not developed.

Natural Resources

We are happy to see the NPS setting clear goals to manage and enhance the extraordinary natural resources at Valley Forge NHP. Years of rapid development in the surrounding areas make Valley Forge NHP even more valuable as wildlife habitat and a diverse ecological resource. As the largest open space within 50 miles of Philadelphia, Valley Forge NHP's natural resources value will continue to increase, and it is critically important that the NPS manage those resources intentionally.

Specific comments on draft GMP:



1300 19th Street, N.W., Washington, D.C. 20036
Telephone (202) 223-NPCA (6722) • Fax (202) 659-0650

1. We fully support the NPS in its efforts to control the white-tailed deer population. The strategy used must address the immediate, acute stress on other native flora and fauna at Valley Forge NHP due to the deer overpopulation. Given the park's extremely high deer population, its location within a rapidly developing area, the lack of natural predators, and the high deer population throughout the region, viable options appear to be limited. While lethal measures should be a last resort in a national park, Valley Forge should consider a limited cull by trained professionals. If the deer are disease-free, we recommend the resulting venison be donated to local food banks.
2. We support the NPS in developing and implementing a plan to remove the asbestos contamination within the park. This is important for many reasons including reducing health risks for humans and wildlife, and improving the visitor experience.
3. We support the NPS in its efforts to work with private organizations, and with state and local governments to protect and enhance the water quality of Valley Creek. Because much of the pollution harming Valley Creek and park resources comes from activities on areas upstream, it is important that there is a cooperative relationship between the park and these outside interests.

Traffic

Of the almost 7 million visitors yearly to the park, nearly 6 million simply drive through. Commuter traffic degrades the visitor experience, and poses safety threats to commuters and visitors. Of fundamental importance, the NPS and decision makers at all levels must reduce traffic impacts on the park. Other than the new park gateway, no new or relocated roads should be built in the park. Moreover, alternatives to car travel need thorough consideration and implementation.

Specific comments on draft GMP:

1. The planned widening of Route 422 should include extensive vegetative buffers to minimize the intrusion on the park's soundscape.
2. While ideally the state should convey ownership of Route 23 to the NPS, and co-locate Route 23 onto Route 422, at the least, as outlined in the GMP, the state and the NPS must work together to install traffic-calming measures. Leisurely park visitors and hurried commuters on Route 23 need engineering assistance to minimize potentially dangerous conflicts.
3. As outlined in the GMP, the state park-era maintenance complex should be removed from the Grand Parade grounds, so the Parade can be restored to its historic contour; County Line Road should be closed to traffic and restored to



- field condition; and Gulph Road should be closed to public traffic and restored as a historic trace road.
- As indicated in the draft GMP, the NPS should test closing the park tour roads to private vehicles and providing shuttle service to key interpretive sites. This is important for many reasons including curbing air pollution, improving the safety of visitors, and enhancing the visitor experience. In order not to discourage group trips to the park, tour buses that have pre-registered should be allowed on park roads even during times they are closed to private cars. The numbers of buses permitted to tour each day should be limited. The NPS should consider closing the roads seasonally, leaving them open to the public during the winter months. Reviewing the experiences of other national parks, including Harpers Ferry NHP and Zion National Park, that have implemented successful shuttle systems may be helpful. Finally, different types of vehicles should be studied for use as the shuttle and the most environmentally friendly option chosen (see section below on Air Quality).
5. We support the NPS in working with area decision makers to continue to pursue the Schuylkill Valley Metro if its construction and operation can be environmentally responsible, with no or minimal impacts on the historic landscape. If Port Kennedy is reopened, as outlined in the draft GMP, it should only be for park visitors and not commuters.

Visitor Experience and Interpretation

We are pleased to see the NPS' preferred alternative approaches interpretation on the premise that people have a variety of learning styles, with some learning best by exploring, discovering, and doing; and others through formal programs and directed experiences.

Specific comments on draft GMP:

1. While we understand the pressures to decrease permanent staff due to funding constraints, there should be flexibility to maintain staff levels or increase them should the funding climate change.
2. As stated above, we support the increased attention to the park's volunteer program. We also support the NPS' creative use of technology such as Podcasts and cell phone tours. However, these should supplement, not replace, ranger-led interpretive programs. Having contact with rangers and access to ranger-led programs are among the most-valued experiences of park visitors.
3. As outlined in the GMP, we support the addition of more exhibit space to the Welcome Center. We also support the idea of having rotating exhibits and limited time special exhibits.



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4. Should the American Revolution Center be built at Valley Forge, we believe the best location is the one originally chosen, the former quarry site at the lower parking lot near the current Welcome Center. This location is convenient to the current center of park visitation; would reuse a brownfield site; and would not interrupt the park's scenic views.

Protecting and Promoting Enhanced Air Quality

In national parks across the country, air pollution threatens park flora and fauna, impairs scenic views, and can even make outdoor recreation an unhealthful experience, and Valley Forge is not immune. Valley Forge NHP is located in counties designated by the US Environmental Protection Agency (EPA) as having unhealthful air quality due to ozone pollution. We are pleased that the draft GMP includes a section on promoting and protecting enhanced air quality.

Specific comments on draft GMP:

1. Except in emergency situations, the use of gasoline-powered equipment should be suspended, not just limited as proposed in the draft GMP, on Code Orange and Code Red ozone pollution days.
2. We applaud the NPS on including that park vehicles should be submitted to emissions testing, but believe the GMP should specifically state that this should be done annually.
3. The park should accelerate the replacement of park vehicles with new ones meeting the U.S. EPA "ultra low emission vehicle" (ULEV) or "zero emission vehicle" (ZLEV) standards.
4. When selecting shuttle vehicles, the park should choose highly-efficient, low-emissions vehicles, such as compressed natural gas, electric, or hybrid vehicles.
5. Whenever the park lighting, heating, or cooling systems are replaced, the park should purchase and install the most energy-efficient systems available. For instance, based on systems commercially available in 2007:
 - Air conditioning systems with seasonal energy efficient rating (SEER) of at least 13.
 - Heating systems with an "Energy Star" annual fuel utilization efficiency (AFUE) of at least 90%.
 - Lighting systems that use compact fluorescent or light emitting diode (LED) technology.

As the Park Service moves forward with this process, NPCA is available to assist in any way we can. Please feel free to contact me at (215) 327-2529 or cwaldbuesser@npca.org.



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December 8, 2006
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Regards,

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National Parks Conservation Association

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The Hon. James Gerlach
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The Hon. Andrew Dinniman
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