



United States Department of the Interior

NATIONAL PARK SERVICE

GETTYSBURG NATIONAL MILITARY PARK EISENHOWER NATIONAL HISTORIC SITE
Gettysburg, PA 17325 Gettysburg, PA 17325



January 2021

Dear Reader

The National Park Service (NPS) is pleased to provide you with the opportunity to provide input on proposed changes to the Superintendent's Compendium for Gettysburg National Military Park and Eisenhower National Historic Site. The Superintendent's Compendium is the summary of park specific rules implemented under Title 36 Code of Federal Regulations (36 CFR). The regulations contained in 36 CFR are the basic mechanism used by the National Park Service to preserve and protect the natural and cultural resources of the park and to protect visitors and property within the park. The Compendium is updated at least annually and serves as public notice related to designations, closures, permit requirements and other restrictions adopted under the Superintendent's discretionary authority. The Superintendent's Compendium does not repeat regulations found in 36 CFR and other United States Code and CFR Titles, which are enforced without further elaboration at the park level.

The National Park Service invites you to comment on proposed changes to park hours and the appropriateness of organized race events on park roadways via the park's planning website at <http://parkplanning.nps.gov/gett>. We will accept public comments on the proposed changes to the Superintendent's Compendium for a period of 30 days between January 19, 2021 to February 17, 2021.

Once you have reached the planning page listed above, scroll down to and click on the project titled "*Proposed Updates to the Superintendent's Compendium for Gettysburg National Military Park and Eisenhower National Historic Site*". On the left-hand side click on "Open for Comment" then select the document titled "ChangesToSuptCompendium-PublicComment-1-19-2021". Scroll to the bottom of the page to access the document for review. Once you have concluded your review select "Comment Now" to enter your comments. Once you have entered your comments don't forget to select "Submit".

Before including your address, telephone number, electronic mail address, or other personally identifiable information in your comments, you should be aware that your entire comment (including your personally identifiable information) may be made publicly available at any time. While you can ask us to withhold your personally identifiable information from public review, we cannot guarantee that we will be able to do so.

If you have questions or would like to request a hard copy version of the document please send the question/request to GETT_Superintendent@nps.gov. Please include "Compendium" in the subject line.

We look forward to receiving your comments.



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Proposed Changes to the Superintendent's Compendium for Gettysburg National Military Park and Eisenhower National Historic Site

1. Park Hours – please note changes in **red font**.

36 CFR §1.5 – VISITING HOURS, PUBLIC USE LIMITS, CLOSURES, AND AREA DESIGNATIONS FOR SPECIFIC USE OR ACTIVITIES

(a)(1) The following visiting hours, public use limits, and closures are established:

Gettysburg NMP Visiting Hours:

- Museum and Visitor Center:

April 1 – October 31: Open daily 8 a.m. to 6 p.m.
November 1 – March 31: Open daily 9 a.m. to 5 p.m.
Closed: Thanksgiving, Christmas Day and New Year's Day.
- Gettysburg National Cemetery and Annex – Open daily **Sunrise to Sunset**.
- The Gettysburg NMP library, curatorial and archives facilities are available to researchers by appointment only.
- All Gettysburg NMP park lands and roadways are open to public access according to the following schedule: **Sunrise to Sunset**
- The following park roadways are open to local vehicle commuter-only traffic, after established park closure hours. Drive-through-only, no stopping, standing or parking along avenues or pull offs:
 - Buford Avenue
 - Doubleday Avenue
 - Granite Schoolhouse Road
 - Howard Avenue
 - Hunt Avenue
 - Millerstown Road
 - Reynolds Avenue
 - Wadsworth Avenue
 - West Confederate Avenue
 - Wheatfield Road
 - Seminary Avenue
- The Slider Farm trail is closed to horses Monday – Friday during the months of April, May, and October due to its use for student education programs.

Eisenhower NHS Visiting Hours:

- The Grounds are open to the public **Sunrise to Sunset**. For additional information on site access during the Covid 19 pandemic, please check the park website.
- During the winter season, January 2 to March 1, the shuttle bus will NOT be operating. The public may drive to the site. The grounds will be available daily from **Sunrise to Sunset** for self-guided tours.
- The site buildings are closed Thanksgiving, Christmas Day and New Year's Day.
- Visitors may access portions of the Eisenhower National Historic Site near Sachs Covered Bridge from **Sunrise to Sunset**.
- The Eisenhower NHS library, curatorial and archives facilities are available to researchers by appointment only. Please contact the park Curator at 717-338-4454.

NOTE: The change in park hours to Sunrise to Sunset will occur throughout the Compendium where park hours are referenced. This change will be effective on May 15, 2021.

2. Organized Race Events - please note changes in red font.

§1.5 Closures and public use limits.

(a)(2) The following restrictions and/or conditions are in effect for the specific uses or activities noted:

Recreational and Sporting Activities:

- Gettysburg NMP and Eisenhower NHS are closed to recreational and sporting activities including, but not limited to the following: racing, skating (including roller-skating and in-line skating), skateboarding (including longboards), motorized scooters, neighborhood electric vehicles, golf carts, pocket motorcycles, hoverboards, electric unicycles or skateboards, caster boards, orbit wheel skates, technical rock climbing, ball playing, kite flying, model aircraft flying, model rocket launching, throwing objects through the air (frisbees, footballs, baseballs, etc.), yoga and sunbathing. Prohibited activities do not include walking, hiking, strolling, jogging, bicycling, electric bicycling, xc-skiing or horseback riding. Specific prohibitions on certain activities may be addressed in other regulations.
- All recreational activities, including bicycling and jogging are prohibited in the Gettysburg National Cemetery and Annex.
- **Organized race events are prohibited on park-owned roadways including the commemorative system of avenues within the park.**

NOTE: This change will be effective on January 1, 2022.

Written Determination Related to Park Hours, January 2021

I. Background

Gettysburg National Military Park was established to preserve, protect, and interpret for this and future generations the resources associated with the 1863 Battle of Gettysburg during the American Civil War, the Gettysburg National Cemetery, and their commemorations. Gettysburg was the Civil War's bloodiest battle and brought devastation to the residents of Gettysburg. The battlefield was also the inspiration for President Abraham Lincoln's immortal Gettysburg Address, delivered at the dedication of the Gettysburg National Cemetery on November 19, 1863. The momentous nature of what occurred at the Battle of Gettysburg led to a high level of preservation and numerous commemorative features placed on the landscape to mark the battlefield landscape and honor the sacrifices and deaths that occurred on these hallowed grounds. The park, cemetery, and battlefield and commemorative landscapes continue to draw people to a place of national consciousness where individuals can consider the far-reaching implications of the battle, the Gettysburg Address, and the American Civil War. (NPS 2016)

Eisenhower National Historic Site, near Gettysburg, Pennsylvania, preserves the home and farm of General Dwight D. Eisenhower, the 34th president of the United States. Consisting of 690 acres, the site includes four distinct farms: the Allen Redding farm, purchased in 1951 by General Dwight D. and Mamie Eisenhower and expanded over the next two decades; two adjoining farms purchased by Eisenhower's associate W. Alton Jones and farmed in partnership with General Eisenhower; and an additional adjoining farm donated to the government to preserve the historic setting.

At both sites, park values and enjoyment of park resources are inescapably linked to their cultural landscapes, historic structures, museum objects, and archeological resources. Due to the significant number of archaeological resources and cultural landscapes located within the parks, recreational activities not conducive to the study and interpretation of their historic and natural scenes are restricted.

Currently, hours that visitors have access to park grounds and roadways at Gettysburg National Military Park vary seasonally. Between April 1 and October 31 park grounds and roadways are open from 6:00am to 10:00pm (closed 10:00pm to 6:00am) and between November 1 and March 31 they are open from 6:00am to 7:00pm (closed 7:00pm to 6:00am). The Gettysburg National Cemetery and annex is currently open from 7:00am to Sunset. The grounds at Eisenhower National Historic Site do not vary seasonally and are open from 9:00am to 5:00pm. The various hours and seasonal changes create confusion among locals and visitors, leading to many people inadvertently violating the closures.

As described in 36 CFR §1.5 Closures and public use limits, the superintendent may "establish, for all or a portion of a park area, a reasonable schedule of visiting hours, impose public use limits, or close all or a portion of a park area to all public use or to a specific use or activity."

Consistent with the above authority, the Superintendent is proposing to change park hours for both sites to a consistent Sunrise to Sunset for park grounds, roadways, the Gettysburg National Cemetery and Annex and Eisenhower National Historic Site grounds and roadways. The proposed change is considered necessary for the following reason:

- To protect fundamental resources and values from damage, vandalism, and destruction during times when there are limited personnel on duty.
- To promote visitor safety by limiting access to park grounds and roadways during daylight hours as the parks do not have any nighttime illumination.

Visiting hours are established based on the availability of park staff, to ensure an enjoyable and safe visitor experience, and to assure adequate protection of park resources. After hours use, nighttime activity and overnight parking create a number of impacts that would be inconsistent with the protection of park resources. The Superintendent has determined there is no valid use of these units during the hours of sunset to sunrise.

II. Justification(s)

- Park visitors are provided ample time for enjoyment during daylight hours when the cultural landscapes can be seen and safely traveled, the park's facilities are open, park law enforcement is present to protect visitor safety and park resources, and park interpretive staff are working to answer questions and relay historic significance to the public.
- This action will reduce the number of hours the public can visit the grounds at Gettysburg National Military Park from between -3.5 (winter) and -6 hours (summer) but it also will extend the amount of time that visitors may access and enjoy the Gettysburg National Cemetery and Annex (+6 hours in summer, no change in winter) and Eisenhower National Historic Site (+7 hours in summer and +1.5 hours in winter). ** Based on the longest and shortest day of year.
- Park-owned parking areas (including at the Gettysburg National Cemetery and along the system of commemorative avenues) are unlighted and pose an increased risk to visitor safety from trip/fall, inability for local commuter-only motorists to see hikers, bikers, etc. sharing the roadway, and other after dark hazards.
- The park is characterized by uneven and rocky terrain that can be hazardous after sunset as visibility is reduced. Park trails are largely unimproved and are also characterized by uneven and rocky terrain which poses a safety risk to park visitors after sunset.
- This action is not of a highly controversial nature because few visitors interested in the park's cultural resources or interpretive offerings would attempt to access these locations after dark.
- This action does not involve effects on the environment that are highly uncertain, involve unique or unknown risks, or are scientifically controversial.

- This action is consistent with park hours at all other nearby Civil War Sites including Antietam National Battlefield, Appomattox Court House National Historical Park, Fredericksburg and Spotsylvania National Military Park, Harpers Ferry National Historical Park, Monocacy National Battlefield, Richmond National Battlefield Park, and Vicksburg National Military Park.
- The proposed change will not affect the ability of local vehicle commuter-traffic to drive through on park roadways after sunset without stopping, standing, or parking along avenues or pull-offs as is currently allowed in the Superintendent's Compendium (36 CFR §1.5).
- The proposed change will not affect existing exemptions including: (1) NPS sponsored and approved public meetings, programs and special events, scheduled to occur in the park after designated closure hours; (2) McMillan Woods Organized Youth Group Campground is accessible to registered campers only after designated closure hours; and (3) Park Living History Volunteers (NPS Permit authorized) are authorized access to their identified campsites only after designated closure hours.
- The proposed change will not affect popular visitor activities such as watching the sunset from the top of Little Round Top as NPS law enforcement will exercise their enforcement discretion, as appropriate, in order to allow time for visitors to return to their vehicles and depart.
- Less restrictive measures will not suffice because of the potential threat to irreplaceable cultural resources. This change in park hours will protect park resources and processes from physical disturbance, damage, and/or removal at times when park staff is either limited or absent. They also help prevent accidents that could result in serious personal injury and/or property damage.

III. Conclusion

This closure is not of a nature, magnitude and duration that will result in a "significant alteration in the public use pattern" because park visitors are provided ample times for enjoyment during daylight hours when the cultural landscapes can be seen and safely traveled, the park's facilities are open, park law enforcement is present to protect visitor safety and park resources, and park interpretive staff are working to answer questions and relay historic significance to the public.

As such, this closure does not constitute impairment to park resources and values and will not adversely affect the park's natural, aesthetic, or cultural values. It does not require significant modification to the resource management objectives. It is also not of a highly controversial nature because few visitors interested in the park's cultural resources would attempt to access these locations after dark. Accordingly, the National Park Service determines that publication as rulemaking in the Federal Register is unwarranted under 36 CFR 1.5(c). This is consistent with the legal opinion of the Office of the Solicitor and past judicial adjudication [*Spiegel v. Babbitt*, 855 F.Supp. 402 (D.D.C.1994)].

Upon finalization, the Superintendent's Compendium will be made available to the public on the park's website. Pursuant to 36 CFR 1.7, notice of this closure will be made by on-site regulatory signage, field contacts, written regulatory information in the park's interpretive materials, and/or through the park's website. Finally, pursuant to 36 CFR 1.5(c), this determination is available to the public upon request.

Written Determination Related to Organized Race Events on Park Roadways, January 2021

I. Problem Statement

Within the past 6 years, Gettysburg National Military Park has developed a practice of issuing special use permits for organized race events on roadways through the park including the commemorative system of park avenues. In 2019, seven races were held in April (N=2), May (N=2), June (N=2) and November (N=1) involving a minimum of 2,300 race participants plus support staff, organizers, and spectators. This use is inconsistent with the park purpose and has unacceptable impacts on park resources, visitor experience, and visitor safety both individually and cumulatively.

The proposed change is considered necessary for the following reasons:

- To ensure protection and preservation of park fundamental resources and values including the sense of solemnity which provides an auditory experience conducive for facilitating reflection and serenity and the commemorative landscape.
- To provide visitors with the opportunity to envision the historic scene and numerous commemorative features of the landscape within an atmosphere of solemnity and quiet contemplation to reflect on President Lincoln's words, the sacrifices of the fallen and the implications of the American Civil War on the nation.
- To promote visitor safety by eliminating events that are not consistent with the park purpose and increase risk to visitor safety by contributing to congestion on the commemorative system of avenues in the park. This determination will not interfere with the ability of traditional park visitors to hike, run or bike on park avenues consistent with the park purpose.

This change represents a clarification to existing language in the Superintendent's Compendium prohibiting certain recreational and sporting activities including "racing" at 36 CFR §1.5 (a)(2) and adds an appropriate written determination. The appropriateness of organized race events was evaluated consistent with the process described in 36 CFR §1.5 Closures and public use limits (available at <https://ecfr.io/Title-36/Section-1.5>) and NPS Management Policies (Section 8.2).

II. Background

Gettysburg National Military Park was established to preserve, protect, and interpret for this and future generations the resources associated with the 1863 Battle of Gettysburg during the American Civil War, the Soldiers' National Cemetery, and their commemorations. Gettysburg was the Civil War's bloodiest battle and brought devastation to the residents of Gettysburg. The battlefield was also the inspiration for President Abraham Lincoln's immortal Gettysburg Address, delivered at the dedication of the Gettysburg National Cemetery on November 19, 1863. The momentous nature of what occurred at the Battle of Gettysburg, led to a high level

of preservation and numerous commemorative features placed on the landscape to mark the battlefield landscape and honor the sacrifices and deaths that occurred on these hallowed grounds. The park, cemetery, and battlefield and commemorative landscapes continue to draw people to a place of national consciousness where individuals can consider the far-reaching implications of the battle, the Gettysburg Address, and the American Civil War. (NPS 2016)

III. General Management Plan and NPS Management Policies

A stated goal of the General Management Plan (GMP) (1999) for Gettysburg National Military Park is to ensure that every event and public activity that takes place in the park is appropriate to park purposes and does not harm resources. Common to all alternatives evaluated is the requirement that all public activities be systematically evaluated for appropriateness. Examples of specific actions under this management prescription include:

- Use NPS criteria to determine if and when uses are compatible.
- Cooperate with local groups to find alternative locations for events.
- Prohibit uses that damage park resources and do not contribute to understanding of park values and resources.

Specific to recreational activities the GMP (1999) states that (1) these opportunities must be consistent with the park's purpose and significance and not harmful to resources or park visitors (p. 8) and (2) the park will not provide facilities developed and intended for purely recreational use or for exercise functions (p. 95).

This GMP goal and specific actions are consistent with NPS Management Policies (2006) which state that “in exercising its discretionary authority, the Service will allow only uses that are (1) appropriate to the purpose for which the park was established, and (2) can be sustained without causing unacceptable impacts.” (NPS 2006, 8.1.1) Although unacceptable impacts may fall far short of impairment, they can rapidly lead to impairment and must be avoided. For this reason, the Service will not knowingly authorize a park use that would cause unacceptable impacts.

Appropriate forms of visitor enjoyment emphasize appropriate recreation consistent with the protection of the park. This includes interpretation of park resources and contemplation and understanding of the purposes for which a park unit's resources are being preserved. (NPS 2006, 8.1.1)

As stated in NPS Management Policies (NPS 2006, Section 8.2) 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 the 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.

To provide for enjoyment of the parks, the National Park Service will encourage visitor activities that:

- are appropriate to the purpose for which the park was established; and
- are inspirational, educational, or healthful, and otherwise appropriate to the park environment; and
- will foster an understanding of and appreciation for park resources and values, or will promote enjoyment through a direct association with, interaction with, or relation to park resources; and
- can be sustained without causing unacceptable impacts to park resources or values.

For the purposes of these policies, unacceptable impacts are impacts that, individually or cumulatively, would:

- be inconsistent with a park's purposes or values, or
- impede the attainment of a park's desired conditions for natural and cultural resources as identified through the park's planning process, or
- create an unsafe or unhealthy environment for visitors or employees, or
- diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values, or
- unreasonably interfere with park programs or activities, or an appropriate use, or the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park, or NPS concessioner or contractor operations or services.

IV. Fundamental Resources and Values and the Visitor Experience

Fundamental resources and values are essential to achieving the purpose of the park and maintaining its significance and when allowed to deteriorate, the park purpose and/or significance could be jeopardized. A sense of solemnity/hallowed ground is a fundamental value of the park. This is perhaps best reflected in President Lincoln's Gettysburg Address, given during the dedication of the Soldiers' National Cemetery, when he stated that "*we cannot dedicate, we cannot consecrate, we cannot hallow this ground. The brave men, living and dead, who struggled here, have consecrated it, far above our poor power to add or detract.*"

Gettysburg National Military Park provides an opportunity to reflect on President Lincoln's words and the sacrifices of the fallen and to contemplate the implications of the Civil War on the nation. As described in the park Foundation Document (2016), the park still possesses a high degree of integrity related to the original sense of place and provides an auditory experience conducive for facilitating reflection and serenity. Maintaining this sense of solemnity is an important goal in any future management decisions for the park. As stated in

the Foundation Document, threats to the sense of solemnity include inappropriate and incompatible visitor uses, increased noise, expansion of commercialism, and special uses that do not meet the park's purpose. (NPS 2016)

The commemorative landscape is also considered a fundamental resource. This landscape corresponds to the Battlefield Commemorative Era (1863-1927), when “veterans and survivors of the battle preserved the grounds of Gettysburg and created commemorative features that still define the park today.” (NPS 2016, p. 6) The park enabling legislation specifically provided for the care of existing and future monumentation, provision of access by visitors to monuments and associated grounds, and established penalty for damage to any column, statue, memorial structure, or work of art. Designed largely by Park Commission engineer Emmor B. Cope, the 1863 battlefield was overlaid with narrow corridors of designed Park landscape which we know today as the Gettysburg commemorative landscape. As stated in the General Management Plan, “the commemorative environment at Gettysburg NMP contributes to the special sense of place of the park, has a history which is in excess of 100 years, and is a significant historic resource in its own right.” (p. 11)

Today, the park contains more than 1,830 cannon, monuments, memorials, tablets, statues and markers. They and the avenues that link them mark the lines of the battle and the positions of regiments and units. The commemorative avenues that were built along the lines of battle are designated in the park General Management Plan (1999, p. 95) as the primary means of visitor access to sites within the park. The avenues go through or lie on top of significant features that affected the outcome of the battle. They are also contributing elements to the national historic landmark significance of the park. As interpretive elements, the monumentation and avenues describe the battle, help visitors visualize the positions of troops, and serve as a reminder of the pain, grief and pride that battle survivors felt after the battle. They are a remarkable record of both the battle and of the emotions of survivors. (NPS 1999)



(a)

(b)

The battlefield and commemorative landscapes (a) and Gettysburg National Cemetery (b) provide visitors with the opportunity to envision the historic scene within an atmosphere of solemnity and quiet contemplation. (NPS Photo)

The only park-owned roads that are not part of the commemorative system of avenues are Granite Schoolhouse Lane, Wheatfield Road, and Millerstown Road. All three roads were present at the time of the Battle of Gettysburg in different forms. Granite Schoolhouse Lane served as an important artery for the Union army, facilitating the movement of reinforcements to and from its left and right wings. It also served as a route from the Baltimore Pike to the Cemetery Ridge defensive line for Union ambulance, ammunition, and supply trains. (Harrison 2004) Wheatfield Road (including portions of what is now Millertown Road) was used by Union artillery and elements of the Second, Third, Fifth, and Sixth Army Corps en route to various points on the battlefield on July 2, 1863. The road provided a defined avenue of approach to battle action sites at the Peach Orchard, Stony Hill, Houck's Ridge, the Wheatfield, and the Emmitsburg Road Ridge during crucial combat situations. Both Granite Schoolhouse Lane and Wheatfield Road are contributing resources to the National Register significance of the park. (Harrison 2004, Holmes 1998) The desired visitor experience at Gettysburg is to provide visitors with the opportunity to envision the historic scene and numerous commemorative features of the landscape within an atmosphere of solemnity and quiet contemplation to reflect on President Lincoln's words, the sacrifices of the fallen and the implications of the American Civil War on the nation.

Relationship to "Races": The fundamental purpose of an organized race such as a marathon or the "Race Across America" is to compete to win or beat a previous time. Race participants gain benefit and inspiration from the scenic beauty of the landscapes through which they travel during a race but they are not present within the park for reasons that are consistent with the purpose for which the park was established.

All such events occur at least in part on park-owned roadways including park avenues which means in many cases they are literally on top of an important historic and commemorative feature of the landscape. Avenues and other park-owned roadways are also the primary means by which visitors get around to experience the park. These roadways/ avenues do not have shoulders and are narrow in order to maintain their historic integrity, are used by multiple types of traditional park visitors (cars, commercial buses, school buses, segway tours, alternate



During the heavy visitor use season between April and October park roadways often experience congestion with multiple modes of transportation used throughout the park. (NPS Photos)

vehicles, cyclists, hikers, etc.), are often congested in high visitor use areas, and are experiencing increasing levels of visitor use. The majority of park avenues have parking on one side of the avenue with visitors then crossing the road to see monuments and the battlefield.

Activities associated with “races” also disturb the atmosphere of respectful solemnity associated with Gettysburg. As described in a recent 2020 After Action Report:

- Runners carried water bottles for up to a mile from the aid station and then tossed them on the ground;
- Runners shed clothing along the course, in one case, tossing it on one of the monuments on Gregg Avenue;
- Race staff at the aid station were ringing a cowbell pretty much the entire time that racers were on the course; and
- The avenue was just barely wide enough to support the two-way vehicular traffic that it is designated to carry and the addition of runners, particularly when there were runners moving in both directions, took up most of the width of the roadway. (NPS 2020a)



Race clothing discarded on park monument (NPS Photo)

Although only one race was held in the park in 2020 due to the Covid-19 pandemic, in previous years in addition to race organizers and volunteers, there have been spectators located along park roadways and avenues to cheer, clap, wave, use noisemakers, etc. to support and inspire race participants. These events may also require parking and other forms of support (e.g. light towers, start/finish lines, portable toilets, water/aid stations, directional signs), and temporary closure of park roadways that require NPS management and compete for limited space with park visitors.



Spectators at the Gettysburg Festival of Races ring bells and hold signs that are inconsistent with the atmosphere of hallowed ground and solemnity at Gettysburg. (NPS Photo)

Ample opportunities exist outside the park for this type of activity. (Attachment 1) In previous years many of these race events have occurred on non-NPS owned roadways through and along the park boundary. Use of these roadways provides access to improved roads, allows race participants to continue to benefit from and get inspiration from the scenic beauty and history of Gettysburg and at the same time promotes resource protection, visitor experience, and visitor safety on park roadways.

Conclusion: Gettysburg National Military Park has concluded that organized races are both inconsistent with the purpose of the park AND result in unacceptable impacts to fundamental park resources and values and the visitor experience. We believe these impacts can be mitigated by prohibiting such uses on park-owned roadways but supporting this use on the numerous state and locally-owned roadways that traverse the park.



Unacceptable Impacts: Park Purpose, Desired Conditions, Visitor Experience

- ✓ Inconsistent with a park's purposes or values;
- ✓ Impede the attainment of a park's desired conditions for cultural resources as identified through the park's planning process;
- ✓ Diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values;
- ✓ Unreasonably interfere with atmosphere of peace and tranquility maintained in historic or commemorative locations within the park.

YWCA Spirit of Gettysburg 5k in Gettysburg National Military Park. (From Pennlive.com at https://www.pennlive.com/running/2013/06/spirit_of_gettysburg_5k_expect.html)

V. Visitor Safety

The safety of park visitors and employees is our top priority. Gettysburg National Military Park contains approximately 31 miles of park avenues and an estimated 14 miles of state and locally-owned roadway through the park. As described above, park-owned roadways and avenues are the primary means by which visitors experience the park. There have been a number of visitor use and transportation studies over the last few decades that have documented transportation issues and access challenges across Gettysburg National Military Park. In 2010, Gettysburg National Military Park was one of nine parks that participated in the National Park Service (NPS), Northeast Region Long-Range Transportation Plan Traffic Safety Study. The purpose of this study was to identify traffic safety issues, conduct an analysis of crash data, discuss traffic operational issues and present recommended countermeasures that address traffic safety and operations issues.

Subsequently, in 2020, the park initiated a Preliminary Project Planning (P3) Study related to transportation. The results of the P3 study will inform next steps to address outstanding questions and information gaps related to the identified transportation issues, identify actions that NPS can take to address the issues, and/or recommend subsequent planning efforts to address more complex issues. These reports provide useful information in evaluating the safety risk associated with “race” events on park-owned roadways with up to 1200 participants per event held primarily on busy weekends in the spring, summer and fall.



Parking on the sides of the road and one-lane access for moving vehicles including cars, commercial buses, school buses, hikers, bikers, etc. at high visitor use areas such as Little Round Top creates congestion and safety risks for park visitors. (NPS Photo)

Northeast Region Long-Range Transportation Plan Traffic Safety Study (NPS 2011)

Useful elements of this study include description of the conditions associated with park roadways and crash statistics between 1990 and 2005. West Confederate Avenue is a popular visitor destination along the park tour route and represents approximately 14 percent of the total park-owned, paved avenue miles in the park. The description of West Confederate Avenue is typical of park avenues. This description included:

- Posted speed limit of 25 mph;
- The right side of the road is reserved for parking and moving traffic travels on the left side.
- The road has no marked center line or edge lines and there are a few other markings at some sites.
- Roadway shoulders are typically gravel or turf and the roadside terrain beyond the shoulders can vary from flat open areas to the presence of fixed objects within a few feet of the roadway.
- Numerous tour groups (both large groups arriving in motorcoaches and small groups that hired a guide to drive their personal vehicles) were observed to park on the west (right) side and then cross the road. These crossings were not concentrated at one location, but instead typically happened wherever the driver parked the vehicle where upon pedestrians crossed the road at that point. It seems that the pedestrians assume that any location along the road is a safe location to cross.

The Wheatfield/Millerstown Road corridor represents approximately 5 percent of the total park-owned, paved roadway miles. It is described as a two-lane, two-way road with a 25-mph posted speed limit. Centerlines are in place on Millerstown Road. Wheatfield Road has no centerline or edge lines except at a narrow bridge located west of Crawford Avenue. Shoulders along Millerstown/Wheatfield Road are typically narrow and are either gravel or turf. The presence of several horizontal curves, a very narrow bridge on Wheatfield Road, and the recently paved status of these roads contribute to the risk to visitor safety in combining race events and multiple types of visitor traffic on these roadways.

As part of this evaluation, a crash study for West Confederate Avenue and the Wheatfield/Millerstown Road corridor was conducted that included parkwide crash statistics. Key results related to crash rates included:

- The average parkwide crash rate between 2001 and 2005, was 407 crashes per 100 million vehicle miles travelled (MVMT).
- The crash rate on West Confederate Avenue between 2001 and 2005, was 171 crashes per 100MVMT.
- The crash rate within the Wheatfield/Millerstown Road corridor between 2001 and 2005, was an average of 453 crashes per 100 million vehicle miles travelled (MVMT) (Wheatfield 416 crashes per MVMT and Millerstown Road 594 crashes per MVMT).

Wheatfield/Millerstown Road accounted for 40 percent of the crashes that occurred on roads counted in the park and has the highest frequency of total and severe (injury) crashes in the park.

- The overall park crash rate was significantly higher than seven other parks evaluated (267 crashes per 100MVMT) as part of this study.
- Within the Wheatfield/Millerstown Road corridor 27 percent of the roadway section crashes were severe injury crashes, which is greater than the 19 percent reported for all roadway sections in the Northeast Region. A cluster of these crashes were associated with the narrow bridge on Wheatfield Road.
- Between 1990 and 2005, the majority of vehicle involved crashes were a result of driver error and collision with a fixed object was the most common overall crash type (67 percent). Although only an estimated 5 percent of crashes involved cyclists or pedestrians, 50%-100% of those involved serious injury depending on the road segment.
- Inattentive, aggressive and impaired driving behaviors were cited as a contributing factor in 78 percent of all roadway section crashes, which is considerably greater than the 46 percent reported in the Northeast Region overall during the same time period.
- Based on the data from 1990 to 2005, Gettysburg National Military Park ranked fifth in the Northeast Region in frequency of heavy vehicle crashes which included commercial vehicles and recreational vehicles (including cross-country buses, school buses, and campers/RVs). Recreational vehicles accounted for 69 percent of the heavy vehicle crashes.

Since this study was published in 2011, the park has taken steps to address traffic safety issues. These actions are limited by the need to protect and preserve the historic fabric and character of park avenues and maintaining the visitor experience and cultural landscape by limiting signage to that which is absolutely necessary to promote visitor safety.

P3 Study (NPS 2020b)

Despite park efforts to address traffic safety issues, the P3 study (NPS 2020b) describes continued traffic congestion and safety concerns:

“During peak visitation (spring, summer, and fall season and special commemorative events) there is considerable traffic and tour bus-related congestion on the self-guided tour route on park avenues through the park. Some of the primary locations for traffic congestion are at Little Round Top, on Hancock Avenue from the Pennsylvania Memorial to Cyclorama Drive, and West Confederate from the North Carolina monument to the Lee monument. Several factors that contribute to traffic congestion at these locations are a lack of parking, conflicts between users including bicyclists, pedestrians, Segway, horse drawn carriages, alternate vehicles, etc. and a lack of effective signage and wayfinding. Some limitations are also tied to the historic preservation of park roadways such as lack of shoulders and the narrow character of park avenues.”



YWCA Gettysburg Half Marathon within Gettysburg National Military Park. (From GettysburgTimes.com at https://www.gettysburgtimes.com/news/local/collection_a86ec873-f91a-5c07-87d4-1186ffb6f501.html#3)

It is noted that in 2021-2022, Little Roundtop, the park's highest visitor use area will be closed for construction for approximately 18 months. It is anticipated that traffic (vehicular, cyclist, pedestrian, etc.) congestion will be exacerbated on roadways and avenues surrounding this site during that time.

Relationship to "Races": Race events that use park avenues add significantly to the number of users on these roadways typically on weekends during high visitation periods (spring, summer, fall). As illustrated above, the historic character of park roadways combined with multiple user groups, inattentive/aggressive drivers, presence of large recreational vehicles, lack of parking, etc. lead to congestion and accidents with the potential for injury. In combination, this leads to an increased risk of injury and/or accident that is avoidable. As described in the After Action Report (NPS 2020a) associated with the only race that occurred in 2020: *"While there were no accidents during the event, the road is just barely wide enough to support the two-way vehicular traffic that it is designated to carry. The addition of runners, particularly when there were runners moving in both directions and taking up most of the width of the roadway, causes vehicles to have to slalom through the pedestrian traffic, creating a hazardous condition for both vehicles and runners."*

Conclusion: Gettysburg National Military Park has concluded that organized races represent an increased risk to park visitors as well as “race” participants and potential for conflicts between multiple user groups on already congested roadways in the park. We believe these impacts can be mitigated by prohibiting such uses on park-owned roadways but supporting this use on the numerous state and locally-owned roadways that traverse the park.



Hope a vehicle door doesn't unexpectedly open or a driver looking at their favorite monument doesn't veer a little right! (NPS Photo)

VI. Final Determination

The determination that organized race events are an inappropriate use on park-owned roadways is not of a nature, magnitude and duration that will result in a “significant alteration in the public use pattern” because race participants will continue to be able to enjoy the scenic beauty and historical context of Gettysburg National Military Park on state and locally owned roadways through the park and along the park boundary.

As such, this action does not constitute impairment to park resources and values and will not adversely affect the park's natural, aesthetic, or cultural values. It does not require significant modification to the resource management objectives. It is also not of a highly controversial nature because race participants have not been excluded from state and locally owned roadways within and along the park boundary and continue to have access to the opportunity for inspiration and enjoyment of the Gettysburg landscape. Accordingly, the National Park Service determines that publication as rulemaking in the Federal Register is unwarranted under 36 CFR 1.5(c). This is consistent with the legal opinion of the Office of the Solicitor and past judicial adjudication [Spiegel v. Babbitt, 855 F.Supp. 402 (D.D.C.1994)].

Less restrictive measures will not suffice because with few trails and limited alternative transportation pathways, the commemorative system of avenues is the primary means by which visitors experience the park. This change will protect park resources, visitor safety, and

the visitor experience by promoting activities in the park that are appropriate and consistent with the park purpose and values. It will also reduce the risk of accidents that could result in serious personal injury and/or property damage.

Upon finalization, the Superintendent's Compendium will be made available to the public on the park's website. Pursuant to 36 CFR 1.7, notice of this closure will be made by on-site regulatory signage, field contacts, written regulatory information in the park's interpretive materials, and/or through the park's website. Finally, pursuant to 36 CFR 1.5(c), this determination is available to the public upon request.

VII. References

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Attachment 1. Map of State and Locally Owned Roadways Through and Bordering Gettysburg National Military Park and Eisenhower National Historic Site.

