

**U.S. Department of the Interior
National Park Service
King of Prussia, Pennsylvania**

**Finding of No Significant Impact
Develop the David Walker Farmstead
Valley Forge National Historical Park
February, 2006**

Introduction

The National Park Service (NPS) proposes to rehabilitate historic and non-historic structures at the David Walker Farmstead, a part of Valley Forge National Historical Park (NHP). The structures and associated land will be leased to the Montessori Children's House of Valley Forge (MCHVF) for use as a pre-school. Figure 1 in the Environmental Assessment/Assessment of Effect (EA/AoE) notes the location of the project site. The purpose and need for this project is to preserve historic structures.

The proposed action includes rehabilitation of the historic David Walker main house and root cellar; demolition of the non-contributing tenant house; demolition of part of the non-contributing barn and addition of a school building to the barn; demolition of the non-contributing Evans house and garage; addition of parking and an entrance drive; construction of stormwater management features; and addition of vegetative screening.

An EA/AoE was released on August 1, 2006, for a 30-day agency review and public comment period in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended and NPS Director's Order #12: *Conservation Planning, Environmental Impact Analysis, and Decision Making* (DO #12). The EA/AoE described the goals of the project, analyzed the effects of each alternative on the human environment, and solicited agency and public comment on the proposed action. The document also complies with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended.

NPS Selected Alternative

The NPS Selected Alternative is Alternative C (the NPS Preferred Alternative) as described on pages 2.19 to 2.21 in the EA/AoE. The NPS Selected Alternative consists of the elements described below, and includes two minor modifications from elements described in the EA/AoE (also see Figure 5 in the EA/AoE). The changed elements also have been incorporated into the EA/AoE via the Errata that are attached to this Finding of No Significant Impact (FONSI).

David Walker Main House

The main house would be rehabilitated for use by the school. The potential of future use as a residence or professional office, which was evaluated by the EA/AoE, was eliminated, based on public comment and further evaluation by the park and the school. The interior of the house, unlike the exterior, lacks cohesive integrity to any one period, with the exception of the interior masonry bearing walls and floor structure of the northern-most section. Any interior work not affecting these

1 features would be accomplished with sensitivity to the compartmentalization of the building. Any
2 other interior, minor, feature modifications would not be subject to the Secretary of the Interior's
3 Standards for Historic Preservation since the interior features do not possess the level or scope of
4 integrity represented by the contributing status of the National Register Nomination of the exterior
5 envelope. Rehabilitation would take place in two phases. Phase I would comprise:

- 6 ■ basic stabilization to arrest deterioration
- 7 ■ incidental repairs to the existing roof, or addition of a new roof, if repairs prove to be ineffective
8 or cost prohibitive;
- 9 ■ removal of ivy from the walls;
- 10 ■ demolition of derelict, non-historic sections of the building, including the small entry vestibule,
11 kitchen, screened porch, and Florida room. Windows would be removed and replaced with
12 energy-efficient windows;
- 13 ■ The exterior walls would be patched and repainted;
- 14 ■ Electricity, water service, and HVAC would be upgraded;
- 15 ■ The first floor would be rehabilitated for school use

16
17 Subsequent phases would include the following actions:

- 18 ■ One section of the current main house is purported to contain a fragment of a late 18th century
19 structure. Although not supported by known evidence, this section of the main house will not be
20 altered until sufficient analysis is conducted; and
- 21 ■ Upper floors of the building would be rehabilitated to accommodate school uses.

22 23 **Root Cellar**

24 The above-ground portion of the root cellar would be stabilized in Phase I and rehabilitated in future
25 phases. In Phase I, the below-ground vault would be filled with sand or similar material to prevent
26 collapse.

27 28 **David Walker Barn**

29 The barn would be developed as the main school facility. Except for the masonry walls, all current
30 features of the structure date from the mid- to late-twentieth century. New development would
31 respect the scale, form, and materials of the existing barn, but would not attempt to replicate it.
32 Development would comprise the following actions:

- 33 ■ Exterior timber framing would be removed and replaced with new exterior sheathing and/or
34 windows;
- 35 ■ A new roof would be installed;
- 36 ■ Loose parging on the masonry walls would be removed and replaced;
- 37 ■ The modern interior and floors would be removed, and two stories of classrooms would be built
38 within the masonry walls;
- 39 ■ Windows would be removed and replaced with energy-efficient windows;
- 40 ■ Electricity and water service would be upgraded and HVAC would be installed;
- 41 ■ Some openings would be made in the masonry walls to meet code-required natural light
42 standards and to admit utilities; and
- 43 ■ The earthen bank on the north side of the barn would be modified as required to develop entries
44 and egress from the structures. Depending on the elevation of the door, the bank may be raised or
45 lowered, to meet requirements of the Life Safety Code.

Shed

The existing one-story 2,000-squarefoot shed on the back of the barn would be demolished. In its place, a two-story 9,400-square foot (+/- 4,700-square foot footprint) addition to the barn would be constructed to house classrooms. This location was selected in order to have the least visual impact from Thomas Road. In the future, the footprint could be extended by approximately 1,000 square feet in order to add classroom space, without additional visual impact.

Tenant's House

The tenant's house, which does not contribute to the National Register significance of the park, would be demolished. As proposed in the EA/AoE, the house had been intended to be reused as the school library. In order to maximize use and rehabilitation of the main house, however, the main house will be rehabilitated during the first phase of construction, and school uses which had been targeted for the tenant's house now will be programmed for the main house.

Wagon Shed

The wagon shed would be used to screen trash and recycling storage, and/or as an area to screen mechanical or utility fixtures. A gated fence would be added to further screen the storage from the school's drop-off space.

Corn Crib

The corn crib would be demolished.

The Site*Utilities*

Sewage service and a new water line to the barn would be laid from Thomas Road to the barn in the previously disturbed area of the driveway to the barn. The sewage and water lines to the main house would remain as is if the current capacity is adequate. Otherwise new sewage and water lines would be run in the location of the existing lines. Utilities to the tenant house would be removed. All new electric lines would be placed underground. Existing overhead electric lines would be placed underground. Exterior lighting would comprise "cut-off" luminaires, which would prevent artificial light from reaching beyond the boundary of the site and from interfering with the night sky. An open 4" conduit would be installed below ground between each of the structures on the site to allow for security and information technology lines to be run at a future date. The conduit would be installed in previously disturbed areas.

Play Space

A 7,500-square foot yard located north of the proposed barn addition would contain play equipment and a combination of grass, resilient surface, and pavement. Additional play spaces would be located at the western edge of the site, as shown on the site plans, Figure 4 on page 2.21 of the EA. If needed for the safety of the children, the play spaces could be fenced in the future.

Signage

A non-lighted sign not exceeding 24 square feet in size would be placed at the entrance to the site to identify the school. Dimensions, placement, and illumination would meet the provisions of the Tredyffrin Township Zoning Code.

1 *Stormwater Management*

2 To address not only the additional runoff generated by the addition of new impervious surfaces on
3 the immediate project site, but also a portion of the existing runoff from the park and the adjacent
4 Pennsylvania Turnpike, the Selected Alternative would include the following:

- 5
6 ■ Infiltration
7 ■ Water quality
8 ■ Peak rate reduction
9 ■ Conveyance channels
10 ■ Erosion and sedimentation control
11

12 Infiltration

13 Preliminary analysis of proposed development of the 3.55-acre site indicates that approximately
14 5,100 cubic feet (c.f.) of stormwater runoff will need to be infiltrated, in compliance with the
15 Tredyffrin Township Code, Article III, Section 301, B.1.a.
16

17 Water Quality

18 All remaining and new impervious areas will be disconnected from direct discharge to closed
19 conduit piping systems and permitted to discharge into drywells or across grassed swales, lawn, or
20 landscaped areas before discharge to waters of the Commonwealth of Pennsylvania. The final water
21 quality design may include the use of drywells for building downspouts, and grass filter
22 strips/infiltration beds for filtering of driveway and parking lot impervious areas. The final design of
23 water quality features will follow the guidelines established in the Pennsylvania Handbook of Best
24 Management Practices for Developing Areas (PA DEP, final draft, 2006).
25

26 Peak Rate Reduction

27 Preliminary analysis of proposed development of the 3.55 acre site indicates that approximately
28 20,000 cf of stormwater runoff will need to be detained in accordance with the Code, Article III,
29 Section 301, B.1b and Section 302 D. Management of this volume will effectively reduce the post-
30 development 100-year storm peak flow rate to the pre-development 100-year storm peak flow rate.
31 Approximately 16,500 cf of this storage volume is necessary to reduce the post-development 10-year
32 peak flow rate to the pre-development two-year peak flow rate per the Code, Article III, Section
33 301.B.1.b.
34

35 Preliminary analysis indicates that the most economical, efficient, and safest design for infiltration
36 and detention of stormwater is in a location uphill of the immediate project site. Four low earthen
37 berms and a 12" high diversion berm will be constructed to provide not only the required stormwater
38 storage of approximately 20,000 cf but also approximately 180,023 cf of excess storage, which will
39 help to lessen urban flooding in the Thomas Road/Richards Road vicinity. The berms also will
40 provide for infiltration of stormwater. See Figure 3 for a diagram of the approximate locations of
41 these features.
42

43 The approximate height and storage capacity of the four earthen berms are as follows:

	Height (inches)	Storage capacity (cf)
Berm 1	24	31,000
Berm 2	24	5,900
Berm 3	24	17,000
Berm 4	30	147,123
Total storage		201,023 cf

A single 4" diameter outlet pipe would be added in Berms 1 to 3 and a 6" diameter outlet pipe would be added in Berm 4. The outlet pipe inverts will be set 6" above the bottom elevation of the berms to facilitate the infiltration of runoff, yet prevent long-term detention. The maximum flow through the 4" diameter pipes at a water height of 24" behind Berms 1 through 3 will be 0.5 cfs. The maximum flow through the 6" diameter pipes at a water height of 30" behind Berm 4 will be 1.3 cfs.

The 12" high diversion swale will direct offsite runoff to an area behind Berm 4. The swale will direct runoff away from the proposed playground.

Conveyance

Stormwater runoff from the Pennsylvania Turnpike and the parkland that is uphill of the immediate project site will be infiltrated behind the proposed berms. Some 100-year storm runoff from those sources, as well as the runoff from the immediate project site, will be conveyed through the site to the Thomas Road storm sewer system. The existing channel through the site will be modified. The existing inlet on the west side of Thomas Road will be modified by enlarging the opening in the back of the inlet to better accommodate incoming flows. A bridge over the channel will allow the new driveway to pass from the Evans property to the David Walker Farmstead.

Erosion and Sedimentation Control

Erosion and sedimentation control will follow the requirements and standards presented in the Commonwealth of Pennsylvania Department of Environmental Protection Office of Water Management's Erosion and Sediment Pollution Control Manual, dated March 2000, as revised. A Post-Construction Stormwater Management Control Plan will accompany the final design.

Existing Thomas and Richards Roads Drainage Systems

The existing piping system in Thomas Road to which the project site runoff drains consists of a 30" reinforced concrete pipe (RCP) cross drain in Thomas Road at a slope of 2.63% and a 30" RCP outfall pipe to Richards Road at a slope of 0.65%. The outfall pipe to Richards Road drains into a piping system along Richards Road, with eventual discharge into Trout Creek. Due to the flat slope of the 30" RCP outfall pipe to Richards Road, the capacity of the 30" cross drain in Thomas Road is approximately 34 cfs. The existing piping system in Thomas and Richards Roads is adequate to convey runoff from the site for storms with 24-hour rainfall amounts up to a maximum of 2". The constraints of the existing municipal pipe system, however, mean that in some storms, current runoff from the site that is not intercepted by the Thomas Road drainage system drains onto the surface of Thomas Road with eventual surface drainage discharge onto Richards Road. This situation could continue to some extent, although the operation of the system will be improved because of the anticipated infiltration and reduction in rate of runoff due to the proposed stormwater management

1 facilities. In summary, it is anticipated that incorporation of the proposed stormwater management
2 improvements will meet the intent of the code and improve the drainage conditions at Thomas Road.

3 4 5 **Cultural Landscape**

6 A drive and small parking lot would be constructed in the rear yard of the David Walker main house.
7 Although the form and enclosed nature of the yard would be preserved, the change in use would
8 modify a character-defining feature of the site. Some large and/or specimen trees would be removed
9 to enable construction, including the fern leaved beech adjacent to the barn. Some of these trees
10 would be replaced, although it would take some years for them to achieve the same size as the
11 original trees. Other important trees, including the Kentucky Coffee Trees along Thomas Road,
12 would receive needed horticultural care.

13
14 Most existing trees and shrubs except those that are in poor condition would be retained. Existing
15 bamboo, which is an exotic, invasive species, would be removed, except where needed for
16 screening. Trees and shrubs would be added adjacent to the new driveway and parking lot on the
17 Evans property in order to screen them from Thomas Road. Trees would be added to the northern
18 boundary line of the leased property to augment the existing screen between the site and the interior
19 of the park.

20 21 22 **Parking and Circulation**

23 The existing driveway to the Evans property would be widened to 16' to serve as the entrance to the
24 school. Although one-way in direction, this driveway would be two lanes wide in order to
25 accommodate vehicles waiting to drop off or pick up children. Because it is the school's practice to
26 stagger drop-off and pick-up times, no vehicles would line up on Thomas or Richards Roads. The
27 Evans house and garage would be demolished, and a 34-vehicle parking lot would be constructed in
28 this area. The parking lot would be fully screened from view from Thomas Road and from the
29 interior of the project site. No school-related parking would take place on Thomas or Richards
30 Roads. From the parking lot, a new 190'-long drive would be constructed northward to the David
31 Walker Farm. A series of culverts would be constructed within the drainage swale to allow vehicular
32 and pedestrian traffic to pass over the depressed grade. Five parking spaces would be constructed
33 adjacent to the main house. A sheltered drop-off area would be constructed north of the house. The
34 existing David Walker Farm parking lot would be used as visitor and handicapped-accessible
35 parking. The existing David Walker Farm driveway would be used as the exit from the site.

36 37 38 **Evans House and Garage**

39 The Evans house and garage would be demolished by MCHVF and would be used as the site of staff
40 and visitor parking.

41 42 43 **Park Operations**

44 The tenant would be responsible for maintenance and security within the 3.55-acre project site. Park
45 staff would manage the lease, consult with the tenant on facility and landscape management issues,
46 and maintain the proposed stormwater management facilities.

Mitigation

As part of the Selected Alternative, the NPS will implement the following mitigation measures:

Natural Resources

- Construction equipment will be staged along existing paved areas or areas to be disturbed to minimize impact potential adverse effects on soils.
- Construction will not be conducted when soils are saturated, such as during or immediately following rain events.
- Construction workers will apply appropriate mitigating measures limiting idling of construction vehicles, to reduce construction equipment emissions.
- To reduce fugitive dust levels during soil-disturbing activities, these activities will be coupled with water sprinkling.

Archeological Resources

- All new or upgraded utility lines will run, to the extent possible, within previously disturbed areas associated with existing lines and alongside or under roadways.
- The NPS has completed archeological testing and data recovery excavations of all project areas where ground disturbance is required. Archeological monitoring will accompany ground-disturbing construction activities.
- Should any significant resources be identified prior to or during construction, all work will stop until the SHPO and the NPS have evaluated the resources for their potential National Register eligibility. If found eligible, appropriate measures will be undertaken to treat and preserve them.
- Construction equipment will be staged along existing paved areas or areas to be disturbed to minimize impact potential adverse effects on soils.

Stormwater Management

New stormwater management facilities, or best management practices (BMP), would be developed in the immediate project site and uphill of it, as described above. Facilities would meet or exceed Tredyffrin Township requirements for infiltration, water quality, peak rate reduction, conveyance, and erosion and sedimentation control.

The proposed stormwater management improvements would lessen the runoff that ultimately flows to Thomas Road for 1- to 100-year storms. The reduction in flows varies from 46.2% for a 1-year storm to 1.2% for a 100-year storm, based upon the pre-site in a meadow condition. It is anticipated that approximately 143,297 cf of runoff will be infiltrated during the 2-year storm, based upon an assumed infiltration rate of 1" per hour. The infiltrated volume will reduce the post development volume of runoff. The proposed channel modifications across the immediate project site would improve the conveyance of runoff to Thomas Road. The proposed improvements to the existing inlet on the west side of Thomas Road would improve the collection of runoff into the Thomas Road stormwater piping system. The collection of more runoff into the existing piping system in Thomas Road, would decrease the amount of runoff directed to the surface of both Thomas and Richards Roads. With less runoff directed to the surface of Thomas and Richards Roads, urban flooding will be reduced.

1 *Demolition*

2 To comply with the requirements of the McKinney Act, buildings to be demolished have been described and
3 submitted to the U.S. Agency of Housing and Urban Design. The agency will solicit public interest in the
4 removal of the buildings off-site
5
6
7

8 **Other Alternatives Considered**

9 In addition to the NPS Selected Alternative described above, the EA/AoE analyzed a No-Action
10 Alternative and one other action alternative.
11

12 **Alternative A (No-Action)**

13 As described in the EA/AoE on page 2.1, Alternative A, the No-Action Alternative, would continue
14 present management operations and maintain existing facilities at the David Walker Farmstead and
15 Evans property. Consideration of a No-Action Alternative is required by NEPA and provides a
16 baseline for comparing the environmental consequences of the action alternatives. Should the No-
17 Action Alternative be selected, the NPS would respond to future needs and conditions associated
18 with facilities at the project site without major actions or changes in the present course (see Figure
19 2). This alternative would include the following elements:
20

- 21 ■ The primary entrances off Thomas Road and the parking areas at the David Walker
22 Farmstead and Evans property would remain in their current locations and
23 configurations;
- 24 ■ The cultural landscape of the David Walker Farmstead and Evans property would be
25 preserved as is. The lawn and field patterns would be unchanged. Trees, shrubs, and other
26 ground cover would remain unchanged. Maintenance of the landscape would occur on an
27 ad hoc basis as funds were available;
- 28 ■ No new internal circulation patterns would be created;
- 29 ■ The David Walker Farmstead buildings and the Evans property buildings would remain
30 as is. No rehabilitation work would take place, and the buildings would continue to
31 remain closed to the public. No fire protection system or security would be added to the
32 buildings. Maintenance of the buildings would occur on an ad hoc basis as funds were
33 available;
- 34 ■ There would be no changes in use of the buildings, structures, or lands.
- 35 ■ There would be no increase in impervious surface and no modifications to stormwater
36 management.
37
38

39 **Alternative B**

40 While most of the features described in the NPS Selected Alternative (Alternative C of the EA/AoE)
41 would be developed under Alternative B (Figure 4 in the EA/AoE), there are several differences,
42 which are described in the EA/AoE on page 2.15 and summarized below.

Cultural Landscape

Under Alternative B, the hedgerow north of the barn would be removed to enable construction of a parking lot. Although it would be replaced, it would take a number of years for the plantings to reach the same size as the current plants. Construction of a new entrance drive and parking area at the northern end of the project site would break the existing strong, visual line of this old boundary. Although a new hedgerow would be planted to serve as a screen, it would be in a different location.

Some large and/or specimen trees would be removed to enable construction, including the fern-leaved beech adjacent to the barn. Some of these would be replaced. Other important trees, including the Kentucky Coffee Trees along Thomas Road, would receive needed horticultural care.

Most existing trees and shrubs except those that are in poor condition would be retained. Existing bamboo, which is an exotic, invasive species, would be removed throughout the site, except where needed for screening.

Parking and Circulation

A new driveway, 200' north of the existing David Walker Farmstead driveway, would be constructed to serve as the entrance to the school. Although one-way in direction, this driveway would be two lanes wide in order to accommodate vehicles waiting to drop off or pick up children. Because it is the school's practice to stagger drop-off and pick-up times, no vehicles would line up on Thomas or Richards Roads. This driveway also would serve 18 new parking spaces. To the degree possible, this lane and parking would be screened from view of Thomas Road and from the interior of the park. The existing parking lot between the barn and the main house would serve as handicapped-accessible parking, and a sheltered drop-off area would be constructed adjacent to it. A new 20-vehicle parking lot would be constructed north of the barn, between the barn and the existing hedgerow. No school-related parking would take place on Thomas or Richards Roads. The existing David Walker Farmstead driveway would serve as the vehicular exit from the site. Three parking spaces, including two that are handicapped-accessible, would be located in the existing parking lot.

Evans House and Garage

In this alternative, the house and garage would not be leased by MCHVF, and would be demolished by the NPS. The building foundations and driveway would be removed; original grades would be restored; and turf would be established on the disturbed areas. The site would be managed as lawn and would be used as an informal play space.

Environmentally Preferred Alternative

The Environmentally Preferred Alternative is defined by the Council on Environmental Quality (CEQ) as "the alternative that will promote the national environmental policy as expressed in the National Environmental Policy Act [Section 101 (b)]." Section 101 (b) goes on to define the Environmentally Preferred Alternative through the application of six criteria listed below. Generally, these criteria define the Environmentally Preferred Alternative as the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances

1 historic, cultural, and natural resources (*NEPA's Forty Most Asked Questions*). Each criterion is
2 presented below, followed by a discussion of how well the proposed alternatives meet each one.

- 3
4
5 **1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding**
6 **generations.** The goal of the NPS at all units is to serve as a trustee of the environment for
7 future generations. Under the No-Action Alternative, the NPS would continue to have
8 difficulty fulfilling this role, since the project site ranks low as a priority for maintenance and
9 rehabilitation of buildings and landscapes. Under Alternatives B and C, historic buildings
10 would be rehabilitated and the site would be maintained.
11
- 12 **2. Ensure for all Americans safe, healthful, productive, and aesthetically and culturally**
13 **pleasing surroundings.** Under the No-Action Alternative, the project site would become
14 increasingly unsafe and unattractive, as conditions continued to deteriorate. Both action
15 alternatives would address safety and would ensure that the project site is well maintained.
16 Alternative C would better meet this criterion since new parking would be well screened on
17 the Evans site, and would not intrude into an area that is more difficult to screen--north of the
18 barn. Alternative B would require removal of the mature trees in the hedgerow north of the
19 barn; Alternative C would preserve those trees.
20
- 21 **3. Attain the widest range of beneficial uses of the environment without degradation, risk of**
22 **health or safety, or other undesirable and unintended consequences.** Under Alternative A,
23 the project site would continue to be unused. Both action alternatives would open the site to
24 use by school children and their families. As described in the EA/AoE, health and safety
25 risks, as well as other undesirable and unintended consequences were addressed during the
26 development of the action alternatives, in order to avoid and minimize potential impacts to
27 the extent possible.
28
- 29 **4. Preserve important historic, cultural, and natural aspects of our national heritage and**
30 **maintain, wherever possible, an environment that supports diversity and variety of**
31 **individual choice.** Under the No-Action Alternative, historic resources would continue to
32 deteriorate. Both action alternatives preserve historic resources and preserve the aesthetic
33 values of the site. Alternative C would better meet this preservation criterion since new
34 parking would be well screened on the Evans site, and would not intrude into a more visually
35 sensitive area that is more difficult to screen--north of the barn. Under Alternative A the
36 project site would continue to be unused. Both action alternatives would return the site to
37 use.
38
- 39 **5. Achieve a balance between population and resource use that will permit high standards of**
40 **living and wide sharing of life's amenities.** Under the No-Action Alternative, the resource
41 would continue to deteriorate and could be lost. Under the action alternatives, the resource
42 would be preserved in a way that is not consumptive
43
- 44 **6. Enhance the quality of renewable resources and approach the maximum attainable**
45 **recycling of depletable resources.** The No-Action Alternative does not contribute to this
46 criterion. Under the action alternatives, historic and non-historic buildings would be

rehabilitated in a manner that uses best management practices for sustainable design, construction and operation.

Although both of the action alternatives meet the above criteria to some degree, Alternative C better meets the criteria of Section 101(b). Alternative C would take advantage of an opportunity to screen new parking and internal circulation from the neighborhood and from the park interior. Taking this into consideration, and balancing the impacts to natural and cultural resources and the population, Alternative C best meets the criteria for the environmentally preferred alternative. Alternative C also was chosen as the NPS Selected Alternative.

Why the NPS Selected Alternative Will Not Have a Significant Effect on the Human Environment

As defined in 40 CFR Section 1508.27, the significance of an impact is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts, which require analysis in an Environmental Impact Statement (EIS).

No major adverse or beneficial impacts were identified that would require analysis in an EIS. The NPS Selected Alternative will have no impact to park operations. There would be short-term, minor, adverse impacts and long-term, negligible, adverse impacts to air quality; and short-term, negligible, adverse impacts as well as long-term, minor, adverse impacts to soundscapes. There would be long-term, minor, adverse impacts to geologic resources, soils, topography, and visual resources. There would be long-term, moderate, adverse impacts to archeological resources, safety/ accessibility/ circulation and long-term, adverse impacts to game animal hunting. There would be long-term, minor, beneficial impacts to visual resources; long-term, moderate, beneficial impacts to historic structures; and both long-term, minor to moderate, adverse impacts and also long-term, minor, beneficial impacts to the cultural landscape.

Degree of effect on public health or safety.

The NPS Selected Alternative will have a long-term, moderate adverse impact on overall public health and safety, due to the addition of school-related traffic to Thomas and Roberts Road

Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

As described in the EA/AoE, Valley Forge NHP encompasses the site of the 1777-78 encampment of the American Continental Army under General George Washington's command. Although multiple layers of history exist throughout the park, the park retains sufficient integrity to convey a majority of stories of its past. No buildings within the study area are individually listed as contributing elements of the Valley Forge NHP National Register historic district, however. Archeological resources would receive a moderate adverse impact due to ground-disturbing activities. These resources are 19th century, and are not associated with the park's primary area of significance

No wetlands, wild and scenic rivers, or ecologically critical areas exist within the study area.

Degree to which effects on the quality of the human environment are likely to be highly controversial.

As measured by scoping and public comment, this project is not likely to be highly controversial. Scoping notices were sent by postal mail to 142 addresses in the vicinity of the project. The notice also was posted on the park website, the NPS planning and public comment website, and on the Tredyffrin Township website. Eighteen communications of comments were received during the 30-day scoping period and were addressed in the document.

At the time of publication of the EA/AoE, notices of availability were sent to 142 addresses and posted on the park, NPS, and township websites. During the 30-day agency and public review and comment period, fifteen communications of comments were received. In relation to the size of the community, this is a small response. Ten of the communications raised concerns. Refer to Attachment A for a summary of public concerns and the NPS responses to them.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.

No highly uncertain, unique, or unknown risks were identified during preparation of the EA/AoE or the public review period.

Degree to which the alternative may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The NPS Selected Alternative neither establishes NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration. Future actions will be evaluated through additional, project-specific planning processes that incorporate requirements of NEPA, Section 106 of the NHPA, and NPS policies.

Whether the alternative is related to other actions with individually insignificant but cumulatively significant impacts.

Impacts of the NPS Selected Alternative to geologic resources, soils, topography, air quality, soundscapes, visual resources, archeological resources, historic structures, cultural landscapes, safety, accessibility and circulation, park operations, and game animal hunting were identified. As described in Chapter 4 of the EA/AoE, cumulative impacts were determined by combining the impacts of the NPS Selected Alternative with other present and reasonably foreseeable future actions: the proposed widening of the Pennsylvania Turnpike and the general increase of traffic in the region. These two present and reasonably foreseeable future actions pose negligible to major adverse impacts on resources including air quality, sound, visual resources, and safety, accessibility, and circulation. The impacts of the NPS Selected Alternative will contribute imperceptible to noticeable increments to the impacts of the two other action on these resources, yet will not add increments that result in a significant adverse impact. Therefore, the NPS Selected Alternative will not contribute or result in significant cumulative impacts.

Degree to which the alternative may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

1 The NPS Selected Alternative will not cause the loss or destruction of significant historic resources
2 or scientific resources.

3
4 In a letter of September 20, 2006, the Pennsylvania State Historic Preservation office concurred with
5 the results of the Environmental Assessment that the selected action poses no adverse effects on the
6 cultural resources of Valley Forge National Historical Park.

7
8 In an email of May 16, 2006, the United States Fish and Wildlife Service concurred that there are no
9 species of concern present on the site.

10
11
12 ***Whether the Alternative threatens a violation of federal, state, or local environmental protection***
13 ***law.***

14 The NPS Selected Alternative violates no federal, state, or local environmental protection laws.
15

16 **Impairment of Park Resources or Values**

17 In addition to reviewing the list of criteria for significant impacts, the NPS has determined that
18 implementing the NPS Selected Alternative will not constitute an impairment of park resources and
19 values. This conclusion is based on a thorough analysis of the impacts described in the EA/AoE,
20 agency and public comments received, and the professional judgment of the decision-makers in
21 accordance with *NPS Management Policies 2001*. As described in the EA/AoE, implementation of
22 the NPS Selected Alternative will not result in major adverse impacts to a resource or value whose
23 conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or
24 proclamation of Valley Forge NHP; (2) key to the natural or cultural integrity of the park; or (3)
25 identified as a goal by the park.
26

27 **Public Involvement**

28 The EA/AoE, prepared in accordance with NEPA, CEQ regulations, Section 106 of the NHPA, and
29 NPS DO #12, was made available for public review and comment beginning August 1, 2006 and
30 ending August 31, 2006. A press release announcing the document's availability was published on
31 the park website, and copies of the EA/AoE were placed in local libraries and at the Valley Forge
32 NHP Welcome Center. An announcement of the availability of the document was placed on the
33 Tredyffrin Township website. A digital version was available at <http://parkplanning.nps.gov/>. The
34 EA/AoE was distributed to federal, state, and local regulatory agencies; local businesses; and
35 interested individuals for their review. Two public meetings were held on August 22, 2006.
36

37 During the 30-day agency and public review and period, fifteen letters of comment were received.
38

39 Public and agency review and comments resulted in the following changes or updates to the
40 information and findings presented in the EA/AoE and to the NPS Selected Alternative:

- 41 ■ Concern was expressed over the deteriorating condition of the David Walker main house and
42 over the uncertain time frame for future rehabilitation and the uncertain nature of future uses.
43 Therefore, the house will be rehabilitated during the first phase of construction, and school uses

1 which had been targeted for the tenant's house now will be programmed for the main house. No
2 non-school uses will be programmed for the main house. The tenant's house will be demolished.
3 ■ Concern was expressed about the current safety of the intersection of Richards and Thomas
4 Road, and the effect on safety with the addition of new traffic associated with the school.
5 Additional consultation with Tredyffrin Township showed that there have been no reportable
6 accidents at the intersection during the last three years, and that the intersection currently does
7 not meet any PennDOT-mandated warrants for sight lines and traffic volumes that would trigger
8 placement of a stop sign on Thomas Road. The township is willing to re-examine the warrants
9 after the school has been in operation for a period of time. Therefore, no changes have been
10 made to the selected alternative as a result of these comments.

11
12 Editorial corrections and changes in response to public comment were made to the text of the
13 EA/AoE, and are shown on the attached Errata

Conclusion and Finding of No Significant Impact

With guidance from *NPS Management Policies 2001*, natural and cultural resources information, professional judgment, and considering agency and public comments, the NPS has decided to implement the NPS Selected Alternative, presented as Alternative C (NPS Preferred Alternative) in the *Develop the David Walker Farmstead EA/AoE* and amended in this FONSI Implementing the NPS Selected Alternative will preserve historic structures within the project area.

The NPS Selected Alternative does not constitute an action that normally requires preparation of an EIS and will not have a significant effect on the natural, cultural, or human environment. Adverse environmental impacts that could occur are negligible, minor, or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, historic properties either listed on or eligible for listing on the National Register, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified during the impact assessment. Implementing the NPS Selected Alternative will not violate any federal, state, or local environmental protection laws.

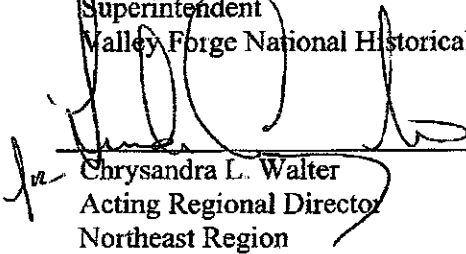
Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended:


Michael Caldwell
Superintendent
Valley Forge National Historical Park

3/8/07
Date

Approved:


Chrysandra L. Walter
Acting Regional Director
Northeast Region

3/12/07
Date

Finding of No Significant Impact
Environmental Assessment/Assessment of Effect: Develop the David Walker Farmstead
Attachment A

The public comment period on the *Environmental Assessment/Assessment of Effect: Develop the David Walker Farmstead* extended from August 1 to August 29, 2006. A total of 15 written communications of comments were received from agencies and the public. Two public meetings were held on August 22, that were attended by a total of 33 people.

This chart summarizes the comments received and provides responses from the National Park Service.

#	Comment	Response
1	Page 5.1 of the EA/AoE characterized three categories of scoping comments as "not the subject of this EA/AOE or ... not meet[ing] law or policy." Some commenters felt that these are key issues that should have been considered in planning process. These include a) interest in uses other than as a school; b) the lack of availability of federal funds to preserve the buildings; c) and the suggestion that NPS sell the properties [or return to previous owner]"	Please see responses for 1a, 1b, and 1c below.
1a	concern that public did not have opportunity to comment on uses other than as a school	Under the provisions of 36 CFR Part 18, Section 18.9, NPS may enter into a lease of federal property with a private non-profit organization. This is not a decision that is subject to public comment. Under Section 18.4, NPS is responsible for meeting certain criteria before leasing a property. These criteria and the finding of the analysis of the criteria, are detailed on page 1.6 of the EA/AoE.
1b	concern about the lack of availability of federal funds to preserve the buildings	NPS preservation funds are allocated among the more than 380 units of the National Park System using a criteria-based ranking system. There is no circumstance in which the David Walker buildings would qualify for federal funds.
1c	suggestion that NPS sell the properties	The sale of park assets is not consistent with NPS policy, and therefore

		was not considered as an alternative in the EA/AoE.
2	opinion that park resources should not be used for private purposes or any purpose not directly related to mission of park	Leasing property for private uses are authorized under 36 CFR Part 18.3, as long as NPS meets the criteria required under Section 18.4. when a lease to a private entity provide preservation of a park resource. Historic preservation is a park mission.
3	opinion that it is inappropriate to add a commercial use to a residential neighborhood	Although the property was previously used commercially—as a stable and apartments, the proposed school is an institutional use, rather than a commercial use. Most schools are, in fact, located in residential neighborhoods.
4	opinion that there is no correlation between the mission of the park and that of the school.	The mission of the school is to cultivate a child's natural curiosity and desire to learn, through positive self-image, concentration and persistence, and respect for others and the environment. The mission of the park is preservation and interpretation of cultural and natural history and resources. Park interpretation is achieved primarily through direct experience of the resources.
5	concern over increased traffic in neighborhood	As described on pages 4.27 and 4.28 of the EA/AoE, school-generated trips at full enrollment (136 students) will total 310 trips (a trip is defined as the movement of any vehicle to or from the site). This number includes parent drop-off and pick-up, staff trips, and service vehicles. This number will comprise 5.4% of the overall projected year 2030 traffic on Thomas Road.
6	concern over safety of Thomas Road/Richards Road intersection if Alternative C driveway is constructed	In light of public concern over traffic safety, park staff requested that the Tredyffrin Township Police Department Traffic Safety Unit again review the potential of a multi-way stop controlled intersection at Thomas and Richards Roads. The department found that none of the required parameters of traffic volume, sight distance issues, and / or reportable traffic crashes are satisfied for current traffic. The department will continue to monitor the intersection as conditions change.
7	concern over congestion at Thomas Road/Richards Road intersection if Alternative C driveway is constructed	As noted on page 2.19 of the EA/AoE, the practice of the school is to stagger its times of drop-off and pick-up. There is adequate queuing space on-site to prevent school-related vehicles from lining up on Thomas or Richards Roads. It is not anticipated that school-generated traffic will contribute to congestion at the intersection.

	concern that park has not worked with state and local governments on traffic problems of region	Through a Memorandum of Understand and subsequent Programmatic Agreement, NPS has worked since 2001 with the U.S. Federal Highway Department, PennDOT, Montgomery and Chester Counties, and the five townships of which the park is a part to address regional traffic congestion. The <i>Valley Forge Area Traffic Planning Study</i> (2001) and the <i>Final Report on the Range of Options</i> (2002) identified problems and possible solutions. Following the completion of additional detailed study, PennDOT has begun to implement the first of a series of solutions that were identified as its responsibility. Concurrently, the park completed its <i>Draft General Management Plan / Environmental Impact Statement</i> , which proposes solutions for traffic congestion within the park. Once of the proposals is to close Gulph Road to public traffic between Route 23 and Thomas Road. The draft is open for public comment until April 10, 2007.
8	concern over parking on Thomas Road	No school-related stopping, standing, or parking will take place on Thomas Road or Richards Road. Adequate space for parking and loading is provided for staff and visitors on-site. Parking for any school events that would exceed on-site capabilities would take place off-site, with a shuttle to the school.
9	concern over potential danger to children on school property from traffic	As shown on Figure 5 of the EA/AoE, the site layout ensures that children are safely dropped-off and picked-up and that play space is well away from internal vehicular circulation and from the street.
10	concern over potential danger to children from ticks bearing Lyme disease	It is a standard health recommendation that all east coast residents check themselves and their children daily for the presence of ticks. Additional safety practices, such as mowing play areas, using rodent traps, and being aware of the seasons in which there is greater tick activity, also can be employed.
11	concern that changes will be highly visible from Thomas and Richards Roads and will negatively affect property values	As shown on Figure 5 EA/AoE, the addition to the barn is set at the back of the site in order to minimize visibility. The school parking lot is located away from Thomas Road. The addition and the parking lot will be fully screened from view from Thomas and Richards Roads with new plantings.
12	opinion that signage will be incompatible	The EA/AoE has been corrected to note that the size of the identifying

	with the character of neighborhood, including such signs as a school identify sign, flashing school zone speed limit signs, and drug-free school zone signs	sign will be a maximum of 24 square feet (rather than 50 square feet). Any sign will comply fully with the Tredyffrin Township Zoning Code. School zone speed limit signs, if used, will help to address the public concern over traffic safety. There is no need for drug-free school zone signs.
13	opinion that the elimination of game-animal hunting on private properties is a significant impact	Game animal hunting on private properties would not be eliminated. As described on pages 4.29 and 4.30 of the EA/AoE, hunters currently must acquire the permission of occupants to hunt within 50 yards of any occupied building. Residents of Thomas and Richards Road who desire to allow hunting on their properties currently must gain the permission of their neighbors, if the neighbors' residences are within 50 yards of the area within which hunting will occur. The safety zone for a school is 150 yards. Residents of Thomas and Richards Roads who desire to allow hunting on their properties within 150 yards of the David Walker property would need to request and gain the permission of the school to do so.
14	request for compensation for potential inability to exercise right to hunt deer on some Thomas and Richards Roads properties	Under the Pennsylvania Game and Wildlife Code, there is no right to hunt within any legally established safety zone.
15	opinion that there was insufficient time to understand EA/AoE	The standard public review period for public documents was provided. Phone numbers and e-mail addresses of park staff were provided to the public so that any questions could be asked and answered. Comments that were received following the closing date were accepted and are reflected on this document.
16	concern over financial viability of school	The Montessori Children's House of Valley Forge is a financially stable organization that has been in operation for over 40 years. Both NPS and a lending institution have reviewed the school's projections and found them to be credible.
17	confusion over national register status of structures and park's preservation responsibility	As described on pages 3.9 to 3.12 of the EA/AoE, two structures—the David Walker main house and the root cellar—contribute to the National Register of Historic Places significance of the park. The cultural landscape also is a contributing factor. The park is required to find means to preserve all contributing historic resources, not just those associated

	opinion that additional archeological testing is required	with the encampment.
18	concern over unknown future use of house and timing of rehabilitation to house	Archeological testing is completed. The testing and its results were reviewed and approved by the Pennsylvania State Historic Preservation Office. All ground-disturbing construction activities will be monitored by qualified archeologist
19	opinion that demolition of portions of David Walker main house is a major adverse impact	In response to these concerns, the school will use the house for school purposes only. No other tenant will occupy the house. Rehabilitation of the house will occur in the first phase of construction, rather than in subsequent phases. These elements have been incorporated into the selected alternative, as described in the FONSI.
20	opinion that alterations to barn are a major adverse impact	Only non-historic portions, such as the modern kitchen, Florida room, and screen porch, would be demolished. The Pennsylvania State Historic Preservation Office concurs that the proposal will have no adverse effect on the historic property.
21	opinion that changes to the site are a major adverse impact	The barn is not eligible for the national register. The Pennsylvania State Historic Preservation Office concurs that the proposal will have no effect on the historic property.
22	concern over removal of trees, "dating possibly as far back as the Valley Forge Encampment"	Based on analysis presented in EA on pages 4.23 to 4.26, effects range from minor to moderate. The Pennsylvania State Historic Preservation Office concurs with this finding, and also with the proposal to mitigate these cultural resource effects.
23	concern over additional stormwater runoff	Some large trees that are unhealthy and failing will be removed. Some large trees that are healthy will be removed to enable construction. As noted on page 2.19 of the EA/AoE, trees will be replaced, although it will take many years for the new trees to attain the height of the removed trees. No trees on the site date to the time of the encampment.
24	opinion that park should implement stormwater management actions regardless of the future use of the site.	As described on pages 2.7 to 2.14 of the EA/AoE, the post-development volume of runoff will be reduced, and improvements to the existing Thomas Road inlets will reduce urban flooding. The park is working with the Pennsylvania Turnpike Commission, with the tenant of the turnpike rest stop, and with Tredyffrin Township through its approvals process, to reduce and mitigate the volume and rate, and to improve the quality of stormwater runoff from the current road

			and plaza and the proposed larger road and plaza.
--	--	--	---

ERRATA

This Errata identifies text changes that are hereby incorporated into the *Develop the David Walker Farmstead Environmental Assessment / Assessment of Effect*. The Errata is organized by document chapter and begins with a brief description of the necessary change. The changes to the text are shown in *italics* or in ~~strikeout~~ (for deletions).

Alternatives

In response to public concern over the use of the main house the document has been changed to put more school use in the main house. Therefore tenant's house, which is a non-contributing structure, will be demolished. Page 2.5 of the document is modified to reflect this.

Tenant's House

~~The interior of the tenant's house would be modified to serve as a meeting space and library for the school. This work would take place during Phase I if budget allows, or would be deferred until a subsequent phase if necessary. Minimal exterior changes are proposed:~~

- ~~*—A new roof may be installed if required;~~
- ~~*—Windows would be removed and replaced with energy efficient windows as necessary;~~
- ~~*—Exterior sheathing would be removed and replaced; and~~
- ~~*—An accessible entry ramp and door may be installed as required to meet code, which would require removal and replacement of the exterior porch.~~

The tenant's house would be demolished and the site rehabilitated

In response to public concern over the use of the main house and the pace at which it will be rehabilitated, the document has been changed to put more school use in the main house. No other uses than for the school would be included. More rehabilitation will be accomplished during the first phase, rather than during the second phase. Page 2.6 of the document is modified to reflect this.

The main house would be rehabilitated for future use by the school ~~or for lease as a residence or professional office~~. The interior of *the house*, unlike the exterior, lacks cohesive integrity to any one period, with the exception of the interior masonry bearing walls and floor structure *of the northern-most section*. Any interior work not affecting these features would be accomplished with sensitivity to the compartmentalization of the building. Any other interior, minor, feature modifications would not be subject to the Secretary of the Interior's Standards for Historic Preservation since the interior features do not possess the level or scope of integrity represented by the contributing status of the National Register Nomination of the exterior envelope. Rehabilitation would take place in two phases. Phase I would comprise:

- basic stabilization to arrest deterioration

- incidental repairs to the existing roof, or addition of a new roof, if repairs prove to be ineffective or cost prohibitive;
- removal of ivy from the walls; and
- demolition of derelict, non-historic sections of the building, *such as including the small entry vestibule, kitchen, screened porch, and Florida room, if the cost of rehabilitation exceeds the perceived value of maintaining the sections.*
- *Windows would be removed and replaced with energy-efficient windows;*
- *The exterior walls would be patched and repainted;*
- *Electricity, water service, and HVAC would be upgraded;*
- *The first floor would be rehabilitated for school use*
- *One section of the current main house is purported to contain a fragment of a late 18th century structure. Although not supported by known evidence, this section of the main house will not be altered until sufficient analysis is conducted*

Subsequent phases would include the following actions:

- ~~Windows would be removed and replaced with energy-efficient windows;~~
- ~~The exterior walls would be patched and repainted;~~
- ~~Electricity, water service, and HVAC would be upgraded; and~~
- ~~The first floor would be rehabilitated for school use~~
- ~~One section of the current main house is purported to contain a fragment of a late 18th century structure. Although not supported by known evidence, this section of the main house will not be altered until sufficient analysis is conducted~~
- Other sections of the building would be rehabilitated to accommodate new uses *school use.*

The projected size of the identification sign for the school exceeds the size allowed by Tredyffrin Township zoning. Text on page 2.7 is changed to reflect the correct size and to refer to additional zoning requirements for signs.

A non-lighted sign not exceeding 50 24 square feet in size would be placed at the entrance to the site to identify the school. *Dimensions, placement, and illumination would meet the provisions of the Tredyffrin Township Zoning Code*

Environmental Consequences

Under the description of potential impacts to soundscapes, reference to Alternative C was inadvertently omitted. The title text on page 4.13 is changed to incorporate Alternative C.

Impacts of Alternatives B and C

Under the description of potential cumulative impacts to safety, accessibility, and circulation, reference to Alternative C was inadvertently omitted. The text on page 4.28 is changed to incorporate Alternative C.

Alternatives B *and* C would contribute a 5.4% increase to projected year 2030 Thomas Road traffic, a noticeable increment.

Under the description of potential cumulative impacts to game animal hunting, text incorrectly referred to park operations, rather than to hunting. Text on page 4.31 is changed to reflect this.

No present or reasonably foreseeable actions contribute impacts to ~~park operations~~ *game animal hunting* in and around the project site. There would be no cumulative impact.