



Mill Springs Battlefield Special Resource Study

2017

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SUMMARY

The Department of the Interior, National Park Service (NPS), has prepared the draft Mill Springs Battlefield Special Resource Study to evaluate for potential inclusion within the national park system the National Historic Landmark (NHL) recognizing the American Civil War Battle of Mill Springs and its associated historic sites and resources located in Pulaski and Wayne Counties, Kentucky. As directed by Congress, this special resource study evaluates the NHL designated battlefield using established criteria for evaluating the national significance, suitability, feasibility, and need for NPS management that must be met for a site to be considered for inclusion in the national park system as a new, independent unit.

LEGISLATIVE HISTORY

In 2015, Congress directed the Secretary of the Interior (Secretary) to evaluate the potential to establish a unit of the national park system that would commemorate and protect the site of the American Civil War Battle of Mill Springs. Section 3051 of the National Defense Authorization Act of 2015 (Public Law 113-291) directed the Secretary to evaluate “the area encompassed by the National Historic Landmark designations relating to the 1862 Battle of Mill Springs located in Pulaski and Wayne Counties in the State of Kentucky.” The legislation specified that this special resource study, containing the study findings and the Secretary’s recommendations, be submitted to Congress within three years of the study funding.

SPECIAL RESOURCE STUDY AND SUMMARY OF FINDINGS

National Park Service *Management Policies 2006*, section 1.3.1, directs that proposed additions to the national park system must meet four legislatively mandated criteria: (1) national significance, (2) suitability, (3) feasibility, and (4) need for direct National Park Service management. All four of these criteria must be met for a study area to be considered for addition to the national park system.

Criterion 1 – National Significance

The Mill Springs Battlefield fully meets the criterion of national significance. Designated as a National Historic Landmark in 1994, the Mill Springs Battlefield study area has been determined to be nationally significant based on National Historic Landmark nomination criteria contained in 36 CFR Part 65.

Criterion 2 – Suitability

The Mill Springs Battlefield study area is considered suitable for inclusion in the national park system. While other national parks and public sites in Kentucky and Tennessee protect and interpret Civil War battles, the Mill Springs Battlefield study area expands and enhances opportunities for resource protection and interpretation related to the military strategies employed during the early days of the Civil War and the civilian perspective in a border state where residents were sharply divided between the Union and Confederate causes.

Criterion 3 – Feasibility

The Mill Springs Battlefield study area meets several components of the special resource study feasibility criterion. An area of this size and configuration would be feasible to administer as a new unit, although traversing Lake Cumberland would add additional staff time and operation costs associated with park management of the three discontinuous units of the study area. No changes to landownership, zoning, or adjacent land uses that would affect the feasibility of administering the

area as a new unit are likely to occur. No known or potential threats are foreseen to the units. All of the study area units have vehicle access, and the study area has high potential for public enjoyment and interpretation. There is public support for designation of the area as a national park unit and the designation would likely result in beneficial economic impacts to the region.

Evaluated under criterion 3, costs and budgetary feasibility associated with the acquisition, one-time facility development and rehabilitation, and long-term operations of the study area are projected to be a substantial commitment. Given the current deferred maintenance backlog and budgetary challenges facing the National Park Service, these costs are a significant barrier to the potential designation of a new national park unit at the Mill Springs Battlefield. Because of projected costs associated with management and operations and NPS budgetary constraints, this special resource study concludes that the Criterion 3 - Feasibility is not met.

Criterion 4 – Need for Direct National Park Service Management

Given the ongoing and successful work of the Mill Springs Battlefield Association, as well as the Army Corps of Engineers–Nashville District, NPS management would not be considered a “clearly superior alternative” to the current management and stewardship of the study area. Taking into account the effectiveness of other management entities already in place along with the negative finding of Criterion 3 - Feasibility because of costs and budgetary constraints impacting the feasibility of NPS management, criterion 4 is also not met.

CONCLUSION

The Mill Springs Battlefield study area meets Criterion 1 – National Significance and Criterion 2 – Suitability, but it does not meet Criterion 3 – Feasibility or Criterion 4 – Need for Direct National Park Service Management. Therefore, the special resource study finds that the Mill Springs Battlefield study area does not meet all four criteria to be eligible for designation as a new unit of the National Park Service.

GUIDE TO THIS STUDY

This special resource study is organized into the following chapters. Each chapter is briefly described below:

Chapter 1: Study Purpose and Background provides a brief description of the study area and an overview of the study's purpose, background, and process. This chapter also summarizes the National Park Service special resource study criteria for evaluation and study methodology.

Chapter 2: Historic Context and Description of Resources provides an overview of the Battle of Mill Springs in the context of the outbreak of the Civil War in Kentucky. The chapter also describes the three key sites within the Mill Springs Battlefield study area being evaluated in the special resource study as well as additional sites and resources for consideration.

Chapter 3: Analysis of the Four Criteria for Evaluation presents the analysis and findings of the four criteria for evaluating the Mill Springs Battlefield study area as a potential new unit of the National Park Service. This chapter provides the evaluation and National Park Service findings required in a special resource study.

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Chapter 1: Study Purpose and Background



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CHAPTER 1: STUDY PURPOSE AND BACKGROUND

PURPOSE OF THE SPECIAL RESOURCE STUDY

New units of the national park system are typically added through an act of Congress. However, before Congress decides to create a new national park unit, it needs to know whether an area's resources meet established criteria for designation.

Provisions of law, together with National Park Service (NPS) policies, govern Congress's consideration of measures to create new units of the national park system. The 1998 National Parks Omnibus Management Act established the process for identifying and authorizing studies of new units. This and related legislative provisions have also been codified in 54 USC 100507, *Additional Areas for the NPS System (Appendix A)*. New park unit studies must be authorized by Congress: under 54 USC, section 100507(b)(40), which states "No study of the potential of an area for inclusion in the System may be initiated except as provided by specific authorization of an Act of Congress." Congress also required the Secretary of the Interior to "designate a single office to prepare all new area studies and to implement other functions under this section" (54 USC 100507(g)). This office is located in the NPS Directorate for Park Planning, Facilities, and Lands, Park Planning and Special Studies Division (PPSS Division).

When the National Park Service is tasked with evaluating potential new areas, it must document its findings in a special resource study. Section 1.3 of *NPS Management Policies 2006* states that "the National Park Service is responsible for conducting professional studies of potential additions to the national park system when specifically authorized by an act of Congress, and for making recommendations to the Secretary of the Interior, the President and Congress." The special resource study process is intended to provide Congress with critical information used in the legislative process of designating a new unit.

The National Defense Authorization Act of 2015 (PL 113-291), signed into law on December 19, 2014, directed the Secretary of the Interior to conduct a special resource study of the Mill Springs Battlefield National Historic Landmark (NHL). This act identified the study area for this special resource study as the area encompassed by the NHL designation relating to the 1862 Battle of Mill Springs. As outlined in the 1994 NHL designation, the Mill Springs Battlefield study area contains approximately 650 acres divided across three areas: 1) the core battlefield; 2) the Beech Grove fortified encampment; and 3) the Mill Springs crossing fortified ferry landing/mill site. The legislation further requires that the study process follows section 8(c) of Public Law 91 - 383 (54 USC 100507) and that the Secretary of the Interior submit a report containing the results of the study and recommendations to the House of Representatives Committee on Natural Resources and the Senate Committee on Energy and Natural Resources.

The purpose of this special resource study is to provide Congress with information about the potential designation of the Mill Springs Battlefield National Historic Landmark as a unit of the national park system. More specifically, the study evaluates the national significance of the study area, the suitability and feasibility of designating the study area as a unit of the national park system, and whether or not there is a need for direct NPS management of the study area (figure 1.1).



FIGURE 1.1 STATE AND REGIONAL CONTEXT

SPECIAL RESOURCE STUDY BACKGROUND

Recognizing the increase in urban development encroaching upon once-rural Civil War battlefields and the potential loss of many of these nationally significant places, Congress passed the Civil War Sites Study Act (Public Law 101-628) in 1991 with the purpose of gathering information on the historic significance, integrity, and preservation opportunities of Civil War sites. As part of the act, the Civil War Sites Advisory Commission was established to evaluate the condition and prioritize for protection all Civil War battlefield sites throughout the country. Released in 1993, the *Civil War Sites Advisory Commission's Report on the Nation's Civil War Battlefields* was the culmination of this two-year effort and outlined overall preservation priorities for Civil War battlefield sites. The Battle of Mill Springs was evaluated and identified as a Preservation Priority I – Critical Need, Class B—Good or Fair Integrity. The report findings for Kentucky battlefields were reassessed in 2008 as part of the *Update to the Civil War Sites Advisory Commission's Report on the Nation's Civil War Battlefields* to capture ongoing preservation efforts over the past 20 years.

The national push to identify, document, and ultimately protect battlefields resulted in a renewed interest in Civil War sites across the country and the creation of many local advocacy and battlefield preservation groups. The Mill Springs Battlefield Association, a nonprofit, grassroots organization, was formed in 1992 to preserve, protect, maintain, and interpret the Civil War battlefield at Mill Springs, Kentucky. The association's grass roots effort resulted in the listing of the Mill Springs Battlefield on the National Register of Historic Places (NRHP) in 1993 and its designation as a National Historic Landmark on April 19, 1994.

The National Park Service American Battlefield Protection Program (ABPP), first created in 1991 and officially authorized by Congress in 1996, is an NPS program established to promote the preservation of significant historic battlefields associated with wars on American soil. The program aims to grow public-private partnerships to enable communities near historic battlefields to develop local solutions for balanced preservation approaches for their historic sites. The National Park Service American Battlefield Protection Program offers preservation partners technical assistance and the opportunity to apply for battlefield planning grants and battlefield land acquisition grants (BLAG).

The Mill Springs Battlefield Association has actively worked with NPS ABPP and the nonprofit Civil War Trust to secure grants to apply towards purchase of battlefield land and to fund archeological surveys and additional scholarly research related to the battle. Ongoing research has resulted in a better understanding of the battle's extent and the historic resources found at Mill Springs, which is reflected in the updated NRHP documentation completed in 2009 for the battlefield and associated Civil War era sites.

In the early 1990s when the Civil War Sites Advisory Commission recognized Mill Springs Battlefield as one of the country's most endangered Civil War sites, only one acre of the battlefield was protected as a county park (Zollicoffer Park). Since the establishment of the Mill Springs Battlefield Association, the group has permanently protected more than 400 acres of battlefield lands, with funding obtained primarily through NPS ABPP Battlefield Land Acquisition Grant program, the Pulaski County and Wayne County Fiscal Courts, the Civil War Trust, Land and Water Conservation Fund, the Transportation Enhancement Act (ISTEA/TEA-21), and private donations and memberships. The association operates the Battlefield Visitor Center and Museum on the northernmost edge of the battlefield, next to the Mill Springs National Cemetery in Nancy, Kentucky. The association also provides an interpretive program that includes a 10-stop driving tour route and two interpreted hiking trails, provides guided tours for groups, and hosts numerous special events throughout the year. Today, the Mill Springs Battlefield Association owns and manages the majority of the lands within the battlefield National Historic Landmark.

In January 2012, US Representative Harold "Hal" Rogers introduced binding legislation (HR 3792) for the Secretary of the Interior to conduct a special resource study to evaluate the feasibility of Mill Springs Battlefield being included in the national park system. The bill recognized the strong community interest in the site generated by the battle's sesquicentennial commemoration, and the Mill Springs Battlefield Association's desire to give the battlefield as a gift to the United States. On December 19, 2014, Congress passed the National Defense Authorization Act of 2015 (Public Law 113-291), which authorized a special resource study for Mill Springs Battlefield National Historic Landmark. This legislation directs the Secretary of Interior to evaluate the battlefield's national significance and the suitability and feasibility of designating the battlefield as a unit of the national park system. The National Defense Authorization Act of 2015 (PL 113-291), Subtitle D – National Park System Studies, Management, and Related Matters, Sec. 305 Special Resource Studies can be found in appendix C.

DESCRIPTION OF THE STUDY AREA

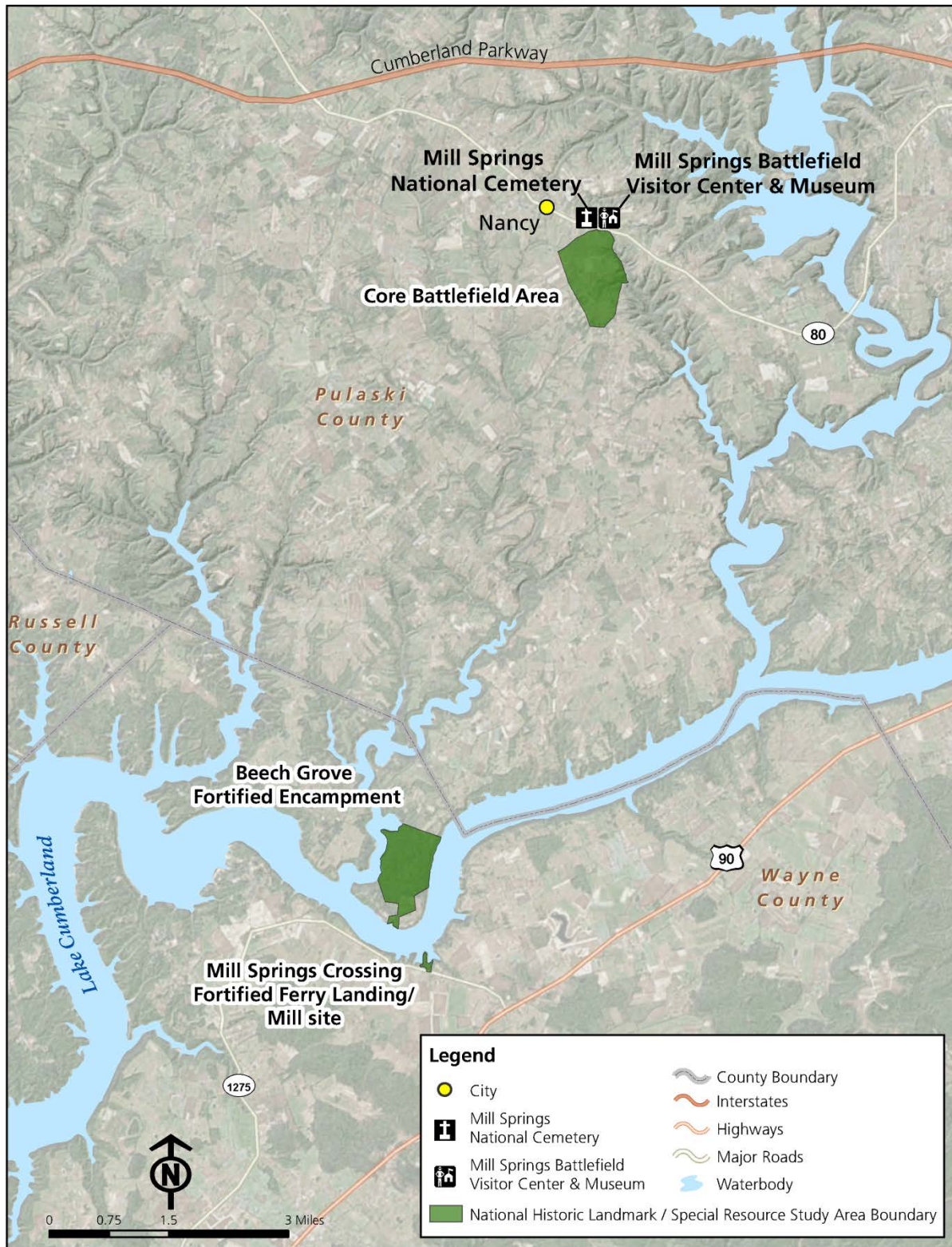
The Mill Springs Battlefield study area is located in southeastern Kentucky, approximately 76 miles south of Lexington, Kentucky, and 130 miles northwest of Knoxville, Tennessee. It sits on the Pennyroyal Plateau, a region characterized by rolling hills, caves, karst features, and farmland. As identified in the Mill Springs Battlefield National Historic Landmark nomination, the study area consists of three discontinuous locations found in Pulaski and Wayne Counties (figure 1.2).

The core battlefield lies north of Lake Cumberland in Pulaski County, a relatively rural area with a population of approximately 65,000 in 2015. The closest town to the battlefield is Nancy, a small, unincorporated community that includes a post office, elementary school, a few businesses, the Mill Springs National Cemetery, and the Mill Springs Battlefield Visitor Center and Museum, which is currently run by the Mill Springs Battlefield Association. Somerset, Kentucky, the largest town in the region and one of the few south-central Kentucky cities with a population over 10,000 people, is approximately eight miles east of the study area. The city serves as a regional hub, offering restaurants and hotel accommodations to those traveling through Kentucky on the Cumberland Parkway or visiting Lake Cumberland. US 27, a north-south transportation corridor that connects Lexington and eastern Kentucky, runs through the city and has become the center of the business district. Major Pulaski County employers include Pulaski County Schools, Lake Cumberland Regional Hospital, and Toyotetsu America, a motor vehicle parts manufacturer. Agriculture remains important, with the industry generating more than \$43 million annually and the county being the state's leading producer of forage products and second in the state in beef cattle production. Approximately 1,000 acres of the eastern part of the county are part of the Daniel Boone National Forest.

The Beech Grove fortified encampment and Mill Springs crossing fortified ferry landing/mill site are located in Wayne County. The encampment is located on a peninsula north of the lake, while the mill site is on the south shore of Lake Cumberland halfway between the towns of Burnside (Pulaski County) and Monticello, Wayne County's largest city. Visitors going to the southern portions of the study area from the core battlefield in Nancy, Kentucky, travel approximately 30 minutes by car, crossing Lake Cumberland east of Burnside at the Kentucky Route 90 Bridge. Small communities and farmland line Route 90, with the unincorporated community of Touristville being the nearest to the ferry landing/mill site. Wayne County, population 20,500, stretches from Lake Cumberland in the west to Daniel Boone National Forest in the east. US Routes 90 and 92 connect this portion of the study area with the rest of the region. Major economic sectors in Wayne County include manufacturing, retail trade connected to Lake Cumberland, and state and local government.

Lake Cumberland, the largest man-made lake east of the Mississippi River, is the main tourism and recreational attraction in the region. Operated by the US Army Corps of Engineers, the reservoir was created by the construction of Wolf Creek Dam on the Cumberland River in 1952. The lake is home to two Kentucky state parks, Lake Cumberland State Resort Park approximately 20 miles to the west of the study area and General Burnside State Park on an island outside Burnside, Kentucky. The 102-square-mile lake has earned the reputation as one of the top houseboating destinations in the country and boasts the fourth highest number of visitor hours out of the 383 lakes controlled by the US Army Corps of Engineers. It provides varied outdoor recreation opportunities, including boating, hiking, fishing, hunting, and camping, for approximately four million visitors a year.

As directed by Congress, the Mill Springs Battlefield special resource study area is defined as the area encompassed by the National Historic Landmark boundary. The Mill Springs Battlefield National Historic Landmark District recognizes the national significance of the Civil War battle fought on January 19, 1862, as well as the Confederate army's 1861 winter encampment located in



Produced by Denver Service Center Planning Division

October 2016

FIGURE 1.2 MILL SPRINGS BATTLEFIELD STUDY AREA

southeastern Kentucky. The Battle of Mill Springs includes three discontinuous areas within Pulaski and Wayne Counties, Kentucky: the battlefield site at Nancy; Confederate fortifications in Beech Grove on the north side of Lake Cumberland; and the Confederate fortifications in Mill Springs on Lake Cumberland's south shore. Overall, the Battle of Mill Springs represents the larger offensive campaigns waged by both the Union and Confederate armies in the early days of the Civil War to control the key border state of Kentucky; it also foreshadowed the battle failures of the Confederate army in the Western Theater and shifting of the war front into Tennessee.

Core Battlefield

The study area includes 320 acres of the core battlefield located a few miles south of Nancy in Pulaski County (figure 1.3). It was here that in the early morning hours of January 19, 1862, Confederate forces engaged Union pickets and the resulting battle of Mill Springs ensued. Most fighting and troop movements took place on both sides of the Mill Springs Road (State Route 235), which closely follows its 19th-century road alignment. The battlefield reflects the area's hilly terrain and includes the contested ridgeline and Clifty Creek ravine, two important natural features that impacted troop movements and tactical approaches by both armies during the battle. This rolling terrain also influenced a Confederate counterattack and retreat back to the Beech Grove fortifications. Twentieth-century farmsteads, agricultural outbuildings, and fields still in agricultural production reflect a rural landscape similar to the one that existed during the time of the battle.

The 2-acre Zollicoffer Park is the centerpiece of the core battlefield area and includes off-street parking and a short hiking trail (3/4 mile) that allows visitors to explore the sites where the heaviest fighting occurred. Named in honor of Confederate General Felix K. Zollicoffer, the park includes a monument to the general as well as a Confederate mass grave marker, both dedicated in 1910. The park is also the site of the famed "Zollie Tree," a white oak tree under which the body of General Zollicoffer was placed after he was shot during the battle. The tree was struck by lightning in 1995, but a seedling was salvaged and replanted in the same location. In 1997, following extensive research, 148 headstones each bearing the name of a Confederate soldier killed during the battle were placed near the mass grave marker, adding to the commemorative landscape of the park.



Core Battlefield area looking south toward Beech Grove.

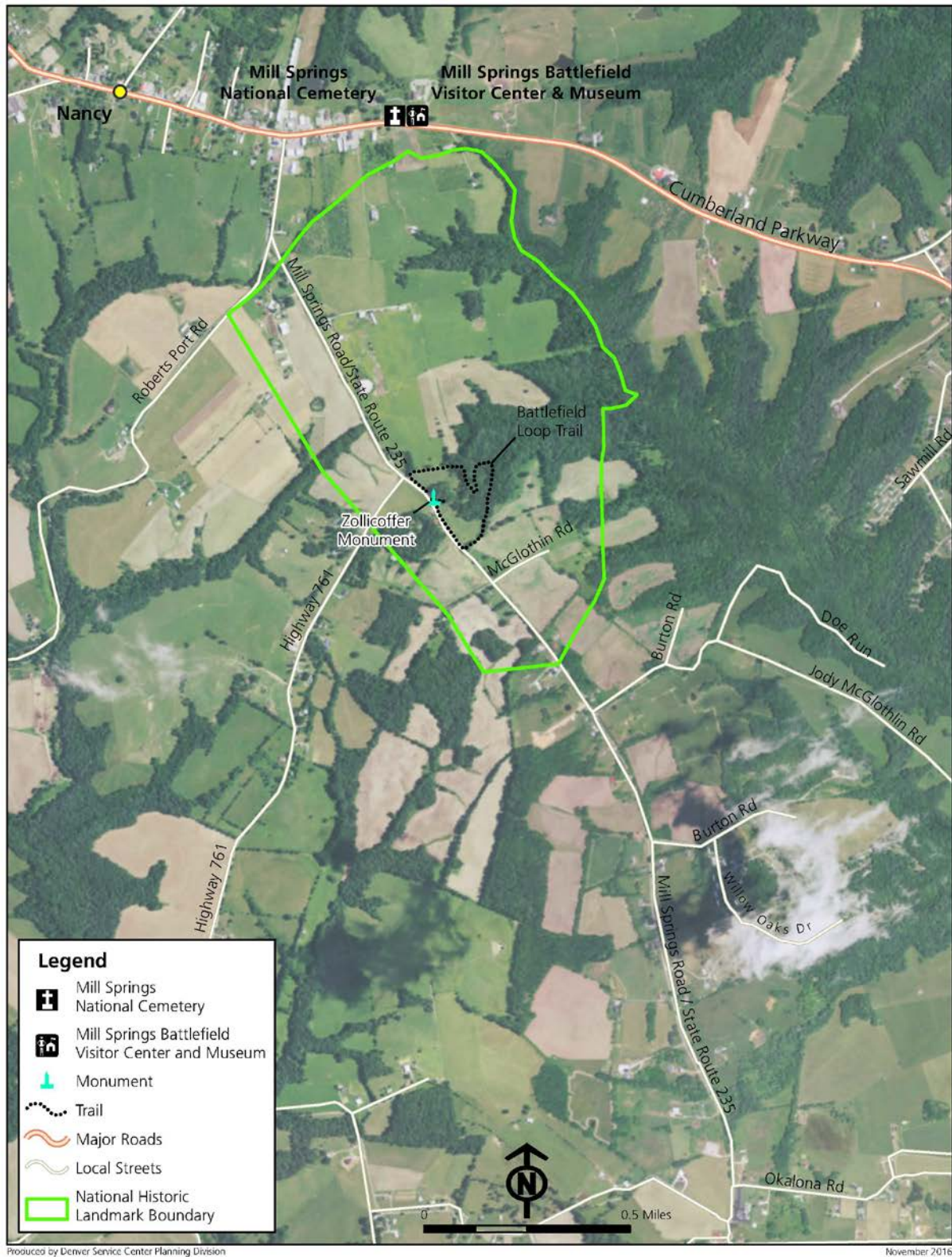


FIGURE 1.3 STUDY AREA - CORE BATTLEFIELD

Additional tour stops and historic sites associated with this location include: Last Stand Hill, Confederate Field Hospital, and Timmy's Branch. These sites are described in Chapter 2: Historic Context. Timmy's Branch is also discussed in chapter 2 in the section "Updated Battle of Mill Springs National Register of Historic Places" nomination.

Beech Grove Fortified Encampment

Located on a peninsula created by a bend in Cumberland River and White Oak Creek (now Lake Cumberland), the 320-acre Beech Grove encampment area is roughly 9 miles south of the core battlefield, along Mill Springs Road (State Route 235) in Wayne County (figure 1.4). During the winter of 1861–1862, Confederate forces occupied this narrow stretch of land, building winter cabins and defensive earthworks to fortify their position. This forested land has seen minimal modern development, and archeological investigations continue to yield a wealth of information about the encampment as well as the surrounding earthworks. A short hiking trail from off-street parking takes visitors along the western edge of the earthworks.

Additional tour stops and historic sites associated with this location include: Moulden's Hill, Zollicoffer's Headquarters, and the Ferry Landing. These sites are described in Chapter 2 "Historic Context Description of Study Area Resources."



Beech Grove earthworks and artillery position.



FIGURE 1.4 STUDY AREA - BEECH GROVE FORTIFIED ENCAMPMENT

Mill Springs Crossing Fortified Ferry Landing/Mill Site

The 7.5-acre ferry landing and mill site is located on the southern shore of Lake Cumberland in Wayne County and roughly follows the boundaries of Mill Springs Park, a day-use recreational site operated by the Army Corps of Engineers (figure 1.5). Thirteen continuous springs have powered grist mill operations at this location since the early 1800s. Occupied by Confederate forces from November 1861 until January 1862, this site was fortified and used to transport both supplies and soldiers across the Cumberland River. Located next to Mill Springs Park is the Brown-Lanier House, owned by the Mill Springs Battlefield Association. Dating to the time of the battle, the Brown-Lanier House was used as a headquarters by Confederate Generals Zollicoffer and Crittenden.

The Army Corps of Engineers acquired the mill site in 1949 as part of the Wolf Creek Dam and Lake Cumberland reservoir project. In 1963, the Monticello Kentucky Woman's Club and other local civic organizations leveraged support from the Kentucky Department of Highways to reactivate the 1877 water-powered grist mill and 1908 steel water wheel. These preservation efforts resulted in the mill's listing in the National Register of Historic Places in 1973. The Army Corps of Engineers, spurred on by continued local interest in the historic structure, undertook a major restoration of the building and site starting in 1976. The Army Corps of Engineers – Nashville District continues to manage the historic water-powered grist mill, one of the largest overshot water wheels still in operation. Paved trails, picnic areas, overlooks, a boat launch, mill gift shop, and restrooms are also maintained by the Army Corps of Engineers. Interpretive efforts and the park gift shop are supported by the Monticello Woman's Club and Army Corps volunteers.

Additional tour stops associated with this location include the West-Metcalf House, which is described in chapter 2 in the section “Associated Historic Sites and Resources Outside the Study Area.”



Mill Springs Park and Lake Cumberland.



FIGURE 1.5 STUDY AREA – MILL SPRINGS CROSSING FORTIFIED FERRY LANDING / MILL SITE

SPECIAL RESOURCE STUDY PROCESS

The special resource study process is designed to provide Congress with critical information about the resource qualities within the study area and potential alternatives for their protection. By law (Public Law 91-383 §8, as amended by §303 of the National Parks Omnibus Management Act [Public Law 105-391]) and NPS Management Policies (2006), potential new units of the national park system must fully meet the following four evaluation criteria:

- 1) Possess nationally significant resources
- 2) Be a suitable addition to the system
- 3) Be a feasible addition to the system
- 4) Require direct NPS management or administration instead of alternative protection by other agencies or the private sector.

This study includes the findings for these four criteria and will serve as the basis for a formal recommendation from the Secretary of the Interior as to whether or not the study area should be designated as a new unit of the National Park Service.

The following methodology was used to conduct this special resource study and determine if the Mill Springs Battlefield meets these criteria:

Step 1: Project Scoping and Collecting Information

Through a process called “scoping,” information about the study area and its resources is collected by the study team. NPS staff identify existing information sources and data needs, issues, and potential constraints and determine or confirm the appropriate National Environmental Policy (NEPA) pathway. The canvassing of existing conditions and available data, such as designation status and nominations and theme studies, etc., is a critical element of scoping and a factor in developing the special resource study. Site visits to the potential study area may be conducted to assess resource conditions and provide additional information that would be used in the development of the study findings.

During the early stages of the study, the team begins the process of identifying the stakeholders, agencies, and individuals with a direct interest in the study area or with expertise that could assist the team; this facilitates planning for later stakeholder conversations and public outreach activities. Engaging the potential stakeholders in the scoping process allows the public, neighbors of the study area, local, state, and other federal government agencies, and other stakeholders to share insights about their issues, concerns, ideas, goals, and objectives for the Mill Springs Battlefield. This process also provides a way for the study team to gauge the level of interest and community support in designating the study area as a unit in the national park system as well as affirm the appropriate NEPA pathway.

Information collected and research conducted through this scoping process is used in the analysis of the four criteria for evaluation.

Step 2: Applying the Four Criteria for Evaluation

To be considered for designation, potential new park units must satisfy all four criteria noted previously. Based on the nature of the study process, a sequential evaluation of these criteria is required. The NPS Office of Legislative and Congressional Affairs has confirmed that to fulfill the mandate of a special resource study, the evaluation of criteria must be done sequentially. While a study area may clearly be infeasible or not in need of direct NPS management, the study process

must first establish national significance and then if that criterion is met, suitability; and so on. When a study area has been found to meet all four criteria for evaluation, the study then proceeds with developing alternatives. A potential new park unit should be included in the range of alternatives only if the special resource study has determined that the study area is nationally significant, a suitable addition to the NPS system, feasible to manage, and that direct NPS management would be clearly superior to other existing management approaches. A brief description of other preservation or management options (e.g., affiliated area) can be included as part of the findings, regardless of a negative finding for suitability or feasibility.

Step 3: Final Study Completion and Transmittal to Congress

Following rigorous agency review and affirmation of the study findings, the final special resource study report will be transmitted by the NPS Director to the Secretary of the Interior. The report and recommendation from the Secretary of the Interior are then transmitted to Congress, which may or may not take action on a study's findings. If legislation for establishing a new unit is drafted, it will usually draw from study findings and elements of the preferred alternative. The time period in which Congress takes action is unknown.

The final special resource study report is made available to the public following receipt by congressional members. This is accomplished by posting the study report to the NPS Planning, Environment, and Public Commenting (PEPC) website. Study documents are not shared prior to their receipt by Congress, nor can findings be discussed with the public or with key stakeholders until their transmittal.

COMPLIANCE WITH NEPA

The National Parks Omnibus Management Act of 1998 requires each study to be "completed in compliance with the National Environmental Policy Act of 1969" (42 USC 4321 et seq.) (54 USC 100507). This study complies with the National Environmental Policy Act of 1969, as amended, which mandates that all federal agencies analyze the impacts of major federal actions that have a significant effect on the environment.

A categorical exclusion (CE) was selected as the most appropriate NEPA pathway for this study. The study is excluded from requiring an environmental assessment or environmental impact statement because there is no potential for impacts on the human environment under normal circumstances. The applicable categorical exclusion is in the category of: "Adoption or approval of surveys, studies, reports, plans, and similar documents which will result in recommendations or proposed actions which would cause no or only minimal environmental impact" (NPS NEPA Handbook, 3.2 (R)). A copy of the CE environmental screening form for the Mill Springs Battlefield Special Resource Study can be found in appendix D of this document.

Public involvement is not required for categorical exclusions. However, the National Parks Omnibus Management Act of 1998 requires special resource studies to be prepared with public involvement, including at least one public meeting in the vicinity of the area under study (54 USC 100507). Two public informational meetings were held early in the study process on January 4, 2016, in Nancy, Kentucky, and January 5, 2016, in Monticello, Kentucky. These meetings provided an opportunity to inform the general public about the study process and gain an understanding of whether there was public support for the creation of a potential park or other NPS involvement. Overall, these meetings were well attended, and public support for the study was positive.

SPECIAL RESOURCE STUDY LIMITATIONS

Based on the authorizing legislation described previously, this special resource study evaluates the land and resources within the boundary identified in the Mill Springs Battlefield National Historic Landmark designation. Since the designation of this National Historic Landmark in 1994, additional research and archeological investigations have resulted in a broader understanding of the battlefield and its many resources. An updated Battle of Mill Springs Historic District National Register of Historic Places nomination was completed in 2009, expanding the battlefield's NRHP boundaries to include an additional 881.5 acres. This expanded boundary included several hundred acres of additional lands associated with the battlefield and Confederate winter encampment and historic resources associated with Timmy's Branch and the West-Metcalf House. Many of these additional lands and resources were also identified by members of the public during open house meetings, so these lands and resources were documented as potential additional sites and resources for consideration in chapter 2 of this study. Given the specific guidance in the study's authorizing legislation, the study area is defined as the Mill Springs Battlefield National Historic Landmark designated boundary.

A special resource study serves as one of many reference sources for members of Congress, the National Park Service, and other persons interested in the potential designation of an area as a new unit of the national park system. The reader should be aware that the analysis and findings contained in this report do not guarantee the future funding, support, or any subsequent action by Congress, the Department of the Interior, or the National Park Service. Because a special resource study is not a decision-making document, it does not identify a preferred NPS course of action.

Chapter 2: Historic Context and Description of Resources



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CHAPTER 2: HISTORIC CONTEXT AND DESCRIPTION OF RESOURCES

INTRODUCTION

This chapter provides historic context of the Battle of Mill Springs in relation to the American Civil War in Kentucky as well as descriptions of related study area resources identified during the special resource study process. The information and research presented in this chapter were used in the analysis of the four criteria for evaluating the study area presented in chapter 3 of this study.

Because Congress directed the National Park Service to investigate the 1862 Battle of Mill Springs as a potential new unit of the national park system, understanding the context of this battle within the American Civil War is essential. Therefore, the “Historic Context” section provides a brief summary of the early days of the American Civil War in Kentucky to better understand the larger context and significance of the battle in American history. Following this historic context, a description of the three key sections of the study area and their primary resources, including cultural landscapes, earthworks, historic structures, and archeological resources, is provided. This section also includes an identification of additional sites and resources that are outside the legislated study area boundary and which may warrant future consideration if a potential national park unit is designated.

HISTORIC CONTEXT

The Gathering Storm—the Civil War Comes to Kentucky

Following the American Revolution, the young nation looked west in search of new lands as the country grew. On June 1, 1792, the Commonwealth of Kentucky became the 15th state to join the Union and the first west of the Appalachian Mountains. The fertile soil and rich pastures earned Kentucky the nickname the “Bluegrass State,” drawing countless settlers into the region through the Cumberland Gap. These pioneers brought with them enslaved people.

Throughout the 19th century, the United States of America continued to grow and expand westward. As territories became new states, the role of slavery in the future of the nation became a key political issue, and sectional differences between the North and South began to take shape. Henry Clay, a prominent Kentucky politician known as the “Great Compromiser,” worked tirelessly to hold the nation together and ease sectional tensions on the issue of slavery. Through numerous political agreements like the Missouri Compromise of 1820 and the Compromise of 1850, an uneasy peace between Southern states that depended on slavery and Northern states demanding the abolition of the inhumane practice was kept. As a border state with strong social and economic ties to both the South and North, Kentucky was caught in the middle of this impending crisis.

Even after these political compromises, sectional tension on the issue of slavery and its future continued to divide the nation, finally erupting into violence. Giving territories the power to determine the fate of slavery within their own borders, the Kansas-Nebraska Act of 1854 would result in bloodshed. In what became known as Bleeding Kansas, pro- and anti-slavery forces fought a brutal border war that foreshadowed the Civil War to come. In 1859, militant abolitionist John Brown led a failed raid on the federal armory at Harpers Ferry, Virginia, in an attempt to incite a slave uprising. Fueling Southern fears of slave revolts and distrust of the Abolitionist movement, the raid and subsequent trial and execution of John Brown led to national outrage.

The Presidential Election of 1860 became the final tipping point. As votes split along sectional lines, the Republican Party nominee and Kentucky native, Abraham Lincoln, carried enough electoral votes to clinch the election. Recognized as the party of the abolitionists, the Republican Party won

the election, and Lincoln's presidency was seen as the final blow to many Southern states. This set in motion the secession of South Carolina, Mississippi, Florida, Alabama, Georgia, Louisiana, and Texas. On April 12, 1861, the first shots of the American Civil War were fired at Fort Sumter in Charleston Harbor. President Lincoln then called upon the remaining states to provide volunteer militia troops to put down the rebellion; this, in turn, triggered a second wave of states leaving the Union, including Virginia, Arkansas, North Carolina, and Tennessee. These eleven Southern states formed what became known as the Confederate States of America. During that tumultuous spring of 1861, it was uncertain what the slave-holding border state of Kentucky would do.

The issues of slavery and a state's right to secede from the Union that divided the nation also divided Kentucky both publically and privately as politicians and many families struggled to resolve their differences. On May 16, 1861, during a special session, the Kentucky House of Representatives resolved, "That this state and the citizens thereof shall take no part in the Civil War now being waged, except as mediators and friends to the belligerent parties; and Kentucky should, during the contest, occupy a position of neutrality."¹ As a border state, Kentucky was in the unfavorable position of standing between two opposing sides. Both the Confederate and Union armies would have to go through Kentucky if they hoped to deliver a decisive blow to their opponent. Neutrality seemed to be the best course of action to prevent Kentucky from becoming the frontline of the Civil War and, therefore, suffering the destruction and devastation that any war would bring. But, would the combatants respect Kentucky's neutrality?

From the onset of the Civil War, it was evident that Kentucky held incredible strategic and military importance because of its physical location, its river access and extensive transportation networks, and its raw materials. President Lincoln is reported to have said, "I hope to have God on my side, but I must have Kentucky." Despite the state's call for neutrality, both sides recruited heavily from the state and began shifting soldiers and supplies into Kentucky. On September 4, 1861, Kentucky's hopes to remain neutral came to an end as Confederate Major General Gideon Pillow invaded western Kentucky, seizing the city of Columbus on the Mississippi River. In response, the Union army moved quickly as Brigadier General Ulysses S. Grant took control of nearby Paducah as a counter strategic holding.² Similar military actions were taking place in eastern Kentucky. As the gateway to eastern Tennessee and western Virginia, Confederate forces moved to secure and hold the strategically important Cumberland Gap. The Union army reinforced Camp Dick Robinson, the first Union base established south of the Ohio River, and established other key supply positions. These offensive moves by both the Union and Confederate armies brought the Civil War to the Kentucky homeland.

As the Confederate government mobilized for war, General Albert Sidney Johnston was placed in command of Confederate Department No. 2 on September 10, 1861. In what would become known as the Western Theater of the Civil War, Confederate Department No. 2 stretched from the Appalachian Mountains in the east to the Mississippi River in the west. Given the soldiers and supplies at his disposal, this huge geographic area would prove impossible for Johnston to defend. Key to Johnston's strategy of protecting the fledgling Confederacy's northern border was establishing a defensive line that stretched across southern Kentucky. With the port city of Columbus on the Mississippi River already under Confederate control and Confederate forces positioned at the Cumberland Gap to the east, Johnston ordered the occupation of Bowling Green, the center of his defensive line in Kentucky. He hoped that by holding southern Kentucky, the

¹ Lowell H. Harrison, *The Civil War in Kentucky* (Lexington: University Press of Kentucky, 2009) 9.

² Walter Coffey, "The End of Neutral Kentucky," *The 55 Months of the American Civil War*, September 3, 2016, <https://civilwarmonths.com/2016/09/03/the-end-of-neutral-kentucky/>.

Confederate army could rally sympathizers and volunteers from the state to their cause while protecting Tennessee and the Deep South from the impending Union invasion.

The Battle of Mill Springs

As hopes for Kentucky's neutrality faded away in the fall of 1861, Brigadier General Felix K. Zollicoffer led his Confederate army of 7,000 soldiers out of Knoxville, Tennessee, through the Cumberland Gap, and into eastern Kentucky to "preserve peace, protect the railroad, and repel invasion."³ Zollicoffer, a newspaper publisher and three-term US Congressman from Nashville, Tennessee, had limited military experience, serving briefly in the Seminole Wars. A brief run-in with Union forces stationed at Camp Wildcat on October 21, 1861, pushed Zollicoffer's forces back to Cumberland Ford near present-day Pineville, Kentucky.⁴ However, this would not be the last time Zollicoffer would venture deep into eastern Kentucky with the hopes of securing the border state for the Confederacy. Meanwhile, Brigadier General George H. Thomas, a West Point graduate, veteran of the Mexican-American War, and native Virginian who remained loyal to the Union, took command of Union forces stationed at Camp Dick Robinson in Kentucky. In a few short months, the two armies under the command of these generals would meet on the field of battle.

In November 1861, under the orders of Johnston, Zollicoffer moved his army to a defensive position in Mill Springs, Kentucky, located on the south bank of the Cumberland River. Here he was expected to set up a winter encampment, fortify his position, and keep an eye on Union forces concentrating farther north in Lebanon and Somerset, Kentucky. The Cumberland River offered access to the interior farmland of Kentucky and served as a supply route as well as a natural defensive barrier between the two armies, making it the ideal, strategic location for an extended stay over the winter. Zollicoffer immediately ordered the construction of earthworks and trenches to further protect his position at Mill Springs. During this time, Zollicoffer reportedly used two nearby houses as temporary headquarters during the winter: the modest West-Metcalf House, located approximately a mile away from Mill Springs, and the Brown-Lanier House located near the Mill Springs grist mill.⁵

After establishing his position on the south bank of the Cumberland River, Zollicoffer made the decision to ferry the majority of his troops and supplies to the northern riverbank and begin fortifying Beech Grove, a narrow strip of land between White Oak Creek and the Cumberland River. This maneuver, widely considered to be a tactical error because the river now blocked the Confederate army's only path of retreat, was actually part of Zollicoffer's overall military strategy. By locating the bulk of his forces north of the river, Zollicoffer felt he could take a more aggressive stance, giving himself a tactical advantage as well as a clear path to attack if Union forces tried to move south or slip past Mill Springs to take the Cumberland Gap.⁶ While Zollicoffer's troops built their fortifications and settled into their winter encampment at Beech Grove, Union forces were on the march. Thomas was ordered to move his Union troops toward Logan's Cross Roads, while Brigadier General Albin Francisco Schoepf's troops were on their way from Somerset. The two Union generals would concentrate their combined forces in preparation of an offensive to drive the Confederate army out of Kentucky.

³ Harrison, *The Civil War in Kentucky*, 23.

⁴ Civil War Sites Advisory Commission, "Camp Wildcat," American Battlefield Protection Program, <https://www.nps.gov/abpp/battles/ky002.htm>.

⁵ National Register of Historic Places, Battle of Mill Springs Historic Areas (Boundary Increase and Additional Documentation), Nancy and Mill Springs, Pulaski and Wayne Counties, Kentucky, National Register #08001121, Section 8, 16.

⁶ National Register of Historic Places, Battle of Mill Springs Historic Areas (Boundary Increase and Additional Documentation), Section 8, 16-17.

Because of his Kentucky roots, Confederate Major General George Bibb Crittenden, son of US Senator John Crittenden, was placed in overall command of the District of Eastern Tennessee and was sent west to take command of the troops wintering at Mill Springs. When Crittenden arrived at Mill Springs on January 7, 1862, he found about 5,000 of Zollicoffer's troops camped on the north bank of the Cumberland River and 12 pieces of artillery positioned at Beach Grove, while the remaining 1,500 men and 4 artillery pieces remained at Mill Springs on the south bank. He immediately demanded that Zollicoffer return his troops and all supporting artillery to the more protected south side of the river as soon as possible, but the swollen Cumberland River hampered this withdrawal.

While early January 1862 saw the Confederate command structure at Mill Springs complicated with the arrival of Crittenden, Union forces were amassing at Logan's Cross Roads, roughly ten miles to the north. Slowed by dismal winter weather conditions and muddy roads, Thomas's Union army marched into Logan's Cross Roads (present-day Nancy, Kentucky) on January 17, 1862. Unknown to the Confederate command at the time, Schoepf's forces had also arrived at the rendezvous point, wading across the swollen Fishing Creek on their march from Somerset.

Fearing that the combined Union forces of Thomas and Schoepf would overpower the Confederate's fortified Beech Grove encampment, Crittenden held a council of war on January 18th. The decision was made to take the enemy by surprise and mount an offensive attack the next day. At midnight on January 19th, the Confederate army began their march to meet the enemy at Logan's Cross Roads with Zollicoffer commanding the lead brigade. The winter rain left the road muddy, slowing the troops and dampening most of the Confederate's gunpowder and muskets. Crittenden had hoped to take the Union army by surprise, but pickets of the 1st Kentucky Cavalry and 10th Indiana encountered the vanguard of the Confederate army, firing the first shots of the Battle of Mill Springs around 6:30 am, near Timmy's Branch.

Following this initial skirmish, the 15th Mississippi and 20th Tennessee deployed into lines of battle. Although maneuvers were limited by the woods that flanked the road, the Confederate army advanced on the Union positions. As the forces pushed forward, Confederate forces began to encounter stiff resistance from the 10th Indiana Infantry and the 4th Kentucky Infantry of the Union army. The battle grew as more soldiers were deployed into action, and fighting on both sides of Mill Springs Road stretched the battle front from east to west. Confederate troops west of the road, led by Zollicoffer, put pressure on the Union lines while the regiments east of the road took advantage of a low ravine in an attempt to flank Union troops positioned near the top of the ravine. The battle seesawed back and forth until Thomas sent reinforcements forward to stabilize the Union position.

During the confusion and fog of battle, Zollicoffer rode toward what he thought was the 19th Tennessee to order a cease fire, convinced these troops were firing on their fellow Confederates. As Zollicoffer approached their commanding officer, Colonel Speed S. Fry of the 4th Kentucky, a Confederate Officer warned "General, it's the enemy," but it was too late. A volley of Union fire mortally wounded Zollicoffer, who became one of the first Confederate generals to be killed in combat. During the battle, his body was moved from the Mill Springs Road and placed under a white oak tree, which became known as the Zollie Tree. Left without a leader, confusion filtered through the Confederate ranks as momentum began to shift toward the Union forces.

A determined charge by the 15th Mississippi and 20th Tennessee moved momentum back toward the Confederate army. Fighting intensified along the split rail fence near the top of the ravine as hand to hand combat broke out in some locations. The tide of battle ultimately turned in favor of the Union when the 9th Ohio executed one of the few successful bayonet charges of the Civil War,

folding the Confederate Army's left flank. This attack coupled with the 2nd Minnesota charge on the center of the line beat back Confederate forces and broke their line.

With the outcome of the battle all but decided, the remaining Confederate forces began the retreat to their fortified encampment at Beech Grove. The 16th Alabama launched a counter attack, holding off advancing Union troops long enough to allow the rest of the Confederate Army to escape and preventing a total rout. This area later became known as Last Stand Hill and is located approximately 1,500 feet south of Zollicoffer Park.

After a brief break to regroup and reload ammunition, Union forces continued south to the Confederate encampment at Beech Grove and were within a mile of the earthworks by 5:00 pm. Union artillery then took a commanding position on Moulden's Hill, a rise overlooking Beech Grove, and began shelling the Confederate fortifications well into the night. Determining his troops' position untenable, Crittenden realized the futility of the Confederate Army's situation and ordered a full withdrawal. Throughout the night of January 19th, Confederate forces ferried across the Cumberland River, leaving behind wounded comrades, artillery, horses, wagons, and most of their camp equipment. As what remained of the Confederate Army retreated back to Gainesboro, Tennessee, numerous men and officers deserted causing Crittenden to write, *"From Mill Springs and on the first steps of my march officers and men, frightened by false rumors of the movement of the enemy, shamefully deserted, and, stealing horses and mules to ride, fled to Knoxville, Nashville and other places in Tennessee."*⁷

The Battle of Mill Springs was over, giving the Union Army its first decisive victory of the Civil War. Confederate losses at the battle were reported at 552 casualties (148 killed and 404 wounded), while Union casualties were 262 (55 killed, and 207 wounded).⁸ More importantly, the Union victory dislodged the Confederate threat from eastern Kentucky, set in motion the collapse of the Confederate defensive line in the state, and helped secure Kentucky's loyalty on the side of the Union cause.

Impacts of the Battle of Mill Springs on the War Effort

Fought in the winter of 1862, the Battle of Mill Springs falls along a continuum of early Civil War battles of the Western Theatre that represented both Union and Confederate military strategies to occupy and hold key positions within the border state of Kentucky. The strategic importance of controlling Kentucky was critical to both the Union and Confederate paths to victory during the war. The Battle of Mill Springs was a significant turning point that emboldened the initial Union Offensive in Kentucky and Tennessee during the Civil War.

Much more than a strategic victory for the Union Army, the Battle of Mill Springs also served as a national rallying call to be used by the press in the North. After the humiliating Union defeat at 1st Manassas the previous summer and a series of military setbacks throughout 1861, a victory for the Union Army was anything but certain and left the outcome of the Civil War in doubt. The Battle of Mill Springs provided a much needed boost to Northern morale, and the national press was quick to cover the story of such a decisive Union victory.

In an issue of Harper's Weekly dated February 8, 1862, the magazine used the victory at Mill Springs, also known as the Battle of Somerset, to evaluate the status of the Confederate army in Kentucky and assess the war effort as a whole. According to the article, *The Union Victory at Somerset, Kentucky*:

⁷ Civil War Trust, "The Battle of Mill Springs," 2014, <http://www.civilwar.org/battlefields/mill-springs/mill-springs-history/the-battle-of-mill-springs.html>.

⁸ Civil War Trust, "Mill Springs – Facts and Resources," 2014, <http://www.civilwar.org/battlefields/mill-springs.html?tab=facts>.

*“The advantages which this victory gives us in clearing East Kentucky of rebel armies, and opening the way to the capture of Bowling Green and an immediate advance into Tennessee are evident. It remain only for us to consider the direct and indirect effects of our triumph upon the people of the rebel States. . . . Still, if we may trust at all to the signs of the times, this victory at Somerset inaugurates the close of the rebellion and may be not inappropriately termed ‘the beginning of the end’.”*⁹

The decisive victory in eastern Kentucky destroyed the left flank of the Confederate defensive line, leaving forces to the west at Bowling Green and Columbus vulnerable to attack. This in turn allowed the Union Army to move forward with offensive operations on the Cumberland and Tennessee Rivers. Following on the heels of the Battle of Mill Springs, Grant’s victories at Fort Henry (February 6, 1862) and Fort Donelson (February 11-16, 1862) sealed the fate of the Confederate army in Kentucky. Both Columbus and Bowling Green were evacuated by the end of February as Confederate forces retreated into middle Tennessee. The victories at Fort Henry and Donelson soon overshadowed the events at Mill Springs and propelled “Unconditional Surrender” U.S. Grant into the national spotlight.

The Union Army’s strategy to control Kentucky is best summed up by Abraham Lincoln’s comment written to his friend O.H. Browning in a letter dated September 22, 1861: *“I think to lose Kentucky is nearly the same as to lose the whole game. Kentucky gone, we cannot hold Missouri, nor Maryland. These all against us, and the job on our hands is too large for us. We would as well consent to separation at once, including the surrender of this capitol.”*¹⁰

With the Confederate threat eliminated from Kentucky, Union forces moved the war into Tennessee and Mississippi. On February 25, 1862, Nashville fell into Union hands without a fight as Confederate forces continued to withdraw farther south. The Union Army would continue their offensive down the Tennessee River, meeting Johnston and his Confederate army at the Battle of Shiloh (April 6-7, 1862). It would not be until the Heartland Offensive of August-October 1862 that eastern Kentucky would see a significant Confederate Army enter the state again.

DESCRIPTION OF STUDY AREA RESOURCES

Mill Springs Battlefield is recognized as a National Historic Landmark because of the national significance of the Civil War battle fought there on January 19, 1862, and the importance of archeological resources associated with the Confederate Army’s 1861 winter camp. The battlefield was designated under the National Historic Landmark theme VI. “Civil War / War in the West” and under the Area of Significance: Military. The period of significance listed in the NHL nomination is December 1861 to January 1862. A number of cultural resources reflecting these themes and identified period of significance have been documented within the study area including: cultural (battlefield, commemorative) landscapes; archeological resources; and historic structures.

Core Battlefield Area

The core battlefield encompasses roughly 320 acres located in Pulaski County. Most fighting took place near Mill Springs Road as troops pushed back and forth along a series of ridges and hills between the road and Clifty Creek ravine. Engagements occurred primarily in the open fields lining the road and wherever the wooded landscape allowed. The rolling terrain, seasonal streambeds, and

⁹ Sons of the South, “Civil War Harper’s Weekly, February 8, 1862,” <http://www.sonofthesouth.net/lee/foundation/civil-war/1862/february/battle-somerset-kentucky.htm>.

¹⁰ University of Michigan, “Collected Works of Abraham Lincoln. Volume 4,” University of Michigan Digital Library Text Collections, <http://name.umdl.umich.edu/lincoln4>.



Core Battlefield area looking north toward Nancy, KY.

Clifty Creek became important battlefield features, with troop movements and fighting occurring across the rural landscape.

Battlefield Landscape. The battlefield landscape retains much of its rural setting, but the land is much more open today than it would have been in January 1862. At the time of the battle, cleared fields where most of the fighting took place were punctuated by wooded lots. The rolling terrain and numerous small creek crossings that influenced troop movements during the battle are still visible today. Period maps record less than ten buildings in the vicinity of the battlefield in 1862, and the area today remains sparsely developed.¹¹ The majority of land within and adjacent to the Mill Springs National Historic Landmark boundary is agricultural and retains a rural feeling and setting similar to what would have been present in 1862. The alignment of Mill Springs Road, the primary route used for troop advances and the Confederate retreat, has shifted slightly west and has been straightened during the 150 years since the battle. Now called State Route 235, the road closely follows its historic alignment and is considered a contributing feature to the battlefield landscape. Old Roberts Port Road, historically known as Kinney's Ferry Road, heads west from Mill Springs Road and retains its historic alignment. State Route 761 branches southwest off historic Mill Springs Road approximately one mile south of downtown Nancy and is a modern intrusion on the north and west portions of the battlefield. The modern road follows the ridgeline that the Union soldiers occupied during the second phase of battle, but, because it primarily follows the natural terrain, the road does not compromise the larger battlefield landscape's integrity. There are no historic structures associated with the battle within the core battlefield area. Noncontributing, 20th-century

¹¹ National Historic Landmark, Mill Springs Battlefield, south of Nancy, Pulaski and Wayne Counties, Kentucky, National Register #93000001, 6.

structures within the Mill Springs National Historic Landmark boundary are primarily agricultural in nature and do not negatively affect the battlefield landscape's integrity.

Archeological Resources. Archeological surveys of the core battlefield area revealed additional information about troop movements and fighting on January 19, 1862. No major natural ground disturbances have taken place and disturbances resulting from agricultural land use are limited to the top 12-18 inches of soil, which leaves much of the archeological resources intact. The January 19, 1862, battle was the only Civil War engagement that occurred on this land, unlike some battlefields in the eastern United States that witnessed multiple engagements during the war. The lack of subsequent fighting means all battle-related archeological resources at the site are related to this single engagement, and the intact archeological record could provide additional information about the Battle of Mill Springs as well as antebellum settlement in the region. Archeological surveys and historic research completed since the 1994 Mill Springs National Historic Landmark listing suggest that the military maneuvers extended east and west beyond the National Historic Landmark boundary and south of Last Stand Hill. These more recent discoveries are summarized in the 2009 NRHP update for the battlefield.



Left: Zollie Tree, Right: Zollicoffer Park.

Zollicoffer Park. Dedicated in 1933 at the site of General Felix Zollicoffer's death, Zollicoffer Park functions as a commemorative landscape and includes numerous memorial features. The one-acre core park area located off Mill Springs Road is bordered by a short stone wall constructed in 1935. Two early 20th-century commemorative features are found in the park: a 1910 stone obelisk monument erected in honor of Zollicoffer by Confederate veterans and a stone marker for the Confederate mass grave at the site. The historic "Zollie Tree," a white oak under which the body of General Zollicoffer was placed during the battle, was the site of an annual Memorial Day decoration ceremony started by young Dortha Burton Hudson in the early 1900s. The Zollie Tree was destroyed by lightning in 1995, but a seedling salvaged from the original tree is now growing in its place. More recent commemorative features added to the park include 147 memorial headstones for identified Confederate soldiers killed during the battle.

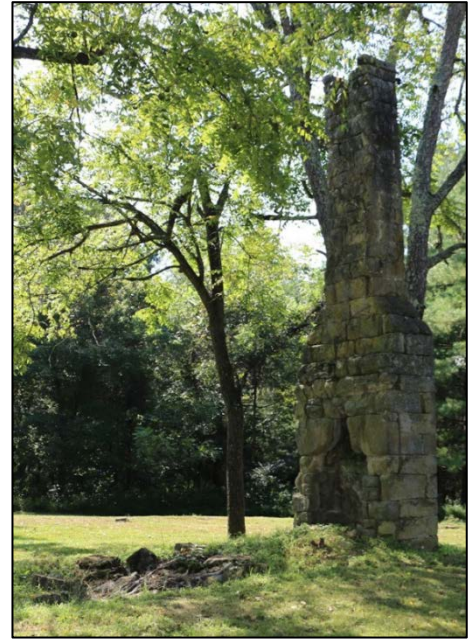
A 0.5-mile walking trail that loops through the park allows visitors to explore the core battlefield area. The Mill Springs Battlefield Association installed split rail fences to reflect the historic appearance and help guide visitors through the site. While some of the contemporary fences do not follow historic fence lines, their presence does not detract from the landscape. Wayside signs interpret the battlefield's topography and a chronology of the battle actions. Zollicoffer Park has become the central location for Mill Springs Battlefield Association-sponsored events, including their annual fall Ghost Walk and Battle Memorial each January.

Beech Grove Fortified Encampment

The Beech Grove Fortified Encampment sits 9 miles south of the core battlefield on a peninsula now surrounded by Lake Cumberland. Union troops called this area "Zollicoffer's Den" because its earthworks and winter cabins provided defensive position and shelter for the approximately 4,000 Confederate troops that crossed the Cumberland River in the winter of 1861–1862. Confederate soldiers built cabins for their winter encampment and were supplied by steamboats on the Cumberland River. Confederate troops retreated to this secure position after the battle of Mill Springs only to be followed by Union troops and artillery that stationed itself on Moulden's Hill. The knoll, located north of the encampment, provided sightlines to the Cumberland River and a clear path for Union artillery fire. Union General Thomas ordered a bombardment on the Confederate fortified positions on the evening of January 19. The following day, when Union forces advanced on Beech Grove, they discovered that the Confederate Army had retreated across the Cumberland River during the night.

The land between the core battlefield and Beech Grove Fortified Encampment was not included in the Mill Springs National Historic Landmark nomination because it was not the scene of direct engagement between the two forces. *National Register Bulletin 40: Guidelines for Identifying, Evaluating, and Registering America's Historic Battlefields* dictates that NRHP/NHL nominations for battlefields should not include routes taken by troops where there were no engagements. Confederate soldiers marched uncontested to the site of battle on the morning of January 19, 1862, and Union forces were slow to follow the Confederate retreat to the fortified encampment that evening. Because these historic events unfolded in two distinct locations, two discontinuous units were identified in the National Historic Landmark designation.

Cultural Landscape. Upon arriving at this site on the north bank of the Cumberland River during the winter of 1861, Confederate troops cleared the land surrounding the encampment and constructed small cabins for additional winter quarters. Between clearing land to create their camp and cutting trees for construction material and fuel, the area of the Beech Grove Fortified Encampment would have been much less wooded than it is today. Remnants of the earthworks and fortified positions can still be found. No historic structures related to the encampment remain. The cabins were destroyed and trenches were filled during the Union army's occupation of the site following the battle. The creation of Lake Cumberland in 1952 also impacted the south shore of the peninsula, but traces remain of the historic Mill Springs Road that traveled through Beech Grove to what was the Cumberland River's north bank. In addition to altering the river, the creation of the reservoir spurred residential development along the lakeshore. Vacation houses and personal docks have sprung up around the lake but have not yet directly affected the Beech Grove Fortified Encampment site. Even with these changes to the cultural landscape, the Beech Grove site retains excellent integrity of setting, feeling, association, and location.



Left: Beech Grove earthworks trail. Right: Chimney of headquarters.

Archeological Resources. Archeological surveys completed in the 1990s confirmed the sites of the earthworks and winter cabins. The majority of land within the encampment has not been disturbed since the Union occupation of the area immediately following the battle. Combined with the number of men wintering at the site, the length of their winter encampment, and the hasty Confederate retreat from the site following the battle, a rich archeological record is present at the Beech Grove location. The site also contains some of the best surviving examples of early Civil War earthworks and hut footprints, making it a significant early war archeological site. Metal detecting surveys north of the encampment have identified the location of the Union artillery position during the Confederate retreat, which sits outside the NHL boundary but is included in the updated NRHP nomination. Additional archeological investigations may reveal valuable information about the state of the Confederate army during the early years of the war as well as data on temporary fortifications.

Historic Structures. The only remaining aboveground structure associated with the time of the battle is the ruins of a house reported to be the winter headquarters of General Zollicoffer in 1861–1862. This location corresponds with period maps identifying this area as a headquarters. A single limestone chimney still stands, and foundation stones roughly delineate the location of this structure.

Mill Springs Crossing Fortified Ferry Landing / Mill Site

General Felix Zollicoffer moved his Confederate forces from the Cumberland Gap into southeastern Kentucky in November 1861 under orders to observe Union movements through the eastern part of the state. He initially set up camp on the southern bank of the Cumberland River near the Mill Springs ferry crossing, mill, and the Brown-Lanier House with the intent of using the heights located above the mill to track Union movements. Confederate troops built extensive earthworks on these heights adjacent to the river in to fortify this position and set up a supply depot at the modest West-Metcalf House located approximately a mile east of the mill. General Zollicoffer then decided to take a more aggressive stance and move the majority of his troops to the river's north bank in an effort to improve the Confederates' position for an offensive attack on the Union, leaving two regiments to winter on the south riverbank and guard supplies. Following the battle, Confederate forces in full retreat desperately ferried across the Cumberland River that night to escape capture.

Cultural Landscape. Today, the Mill Springs Crossing Fortified Ferry Landing / Mill Site is included within Mill Springs Park, a recreational park managed by the Army Corps of Engineers. Even with the development of Lake Cumberland and the creation of Mill Springs Park, the site still retains integrity of setting, feeling, association, and location. Portions of the old ferry landing road running east of the mill are still visible and some of the Confederate trenches have been identified. Historic maps of the Confederate camp show an extensive system of earthworks and defenses on the southern riverbank, but the exact locations of additional fortifications or artillery positions have not yet been determined.



Left: Brown-Lanier House, Right: Grist Mill.

Historic Structures. Two significant historic structures can be found at this location. Although it does not date to the time of the battle, the 1877 water-powered grist mill, the centerpiece of Mill Springs Park, was individually listed on the National Register of Historic Places in 1977. It is maintained and interpreted by the Army Corps. Replacing the 19th-century grist mill that stood at the same location during the time of the battle, the current mill is listed in the NHL nomination as a noncontributing resource.¹² The post-Civil War-era mill offers historic character to the south bank site and does not detract from the National Historic Landmark's integrity. Other modern recreational development and park infrastructure such as paved trails, a boat launch, mill gift shop, and restrooms, are also identified as noncontributing structures at this location.

The Brown-Lanier House, located adjacent to Mill Springs Park, was built prior to the Civil War and served as the residence for the family operating the Mill Springs Mill. First built as a two-room, 1830s log cabin, the house was expanded during the 1840s and 1860s and was considered one of the finest residences in the area at the time of the Battle of Mill Springs.¹³ This two-story farmhouse served as the headquarters for three of the generals who fought at Mill Springs: Confederate Generals Zollicoffer and Crittenden and Union General Thomas, the latter of whom occupied the house

¹² National Register of Historic Places, Battle of Mill Springs Historic Areas (Boundary Increase and Additional Documentation), Section 7, 8.

¹³ Mill Springs Battlefield Association, "History of the Brown-Lanier House," 2013, <http://www.millsprings.net/index.php/2013-10-01-18-24-22/history-of-the-brown-lanier-house>.

following the battle and Confederate retreat. The battle received its name from the after action report written by General Thomas while occupying the Brown-Lanier House. The house, which is owned by the Mill Springs Battlefield Association, is open to the public through guided tours offered by the association. The house retains a high level of integrity, offering a tangible connection to the historic events that unfolded here.

The West-Metcalf House falls outside the Mill Springs National Historic Landmark designated boundary; thus, it is technically outside the legislated special resource study area. This historic structure is an important Civil War-era resource and is critical for understanding the historic events leading up to and following the battle. Because of its historic significance, this building requires additional analysis and consideration in the study process. It is discussed in greater detail in the “Associated Historic Sites and Resources Outside the Study Area” section that follows.

ASSOCIATED HISTORIC SITES AND RESOURCES OUTSIDE THE STUDY AREA

Based on the legislation authorizing this special resource study, the study area is limited to the 1994 Mill Springs Battlefield National Historic Landmark boundary. Through the project scoping process, internal research, site visits, and public outreach activities, the study team identified additional historic sites and resources associated with the Battle of Mill Springs that are located outside the authorized study area boundary. Key sites and resources that are not within the legislated study area were documented and further researched as part of the study process. These sites and resources could impact the analysis of four criteria evaluation presented in chapter 3 and should warrant consideration in any proposed management alternatives. These associated historic sites and resources include: Mill Springs Battlefield Visitor Center and Museum, Mill Springs National Cemetery, West-Metcalf House, and additional resources identified in the updated Battle of Mill Springs National Register of Historic Places nomination (figure 2.1).

Mill Springs Battlefield Visitor Center and Museum

In late 2006, the Mill Springs Battlefield Association opened the Battlefield Visitor Center and Museum, which provides an orientation to the battlefield as well as interpretive materials about the Civil War. The visitor center is located near Nancy, Kentucky, on State Route 80, approximately one mile north of the core battlefield. With the intent of minimizing the building’s impacts on the historic battlefield landscape, the visitor center was located just outside the NHL designated boundary and next to the Mill Springs National Cemetery. The Harold D. Rogers Community Room shows the association’s 20-minute interpretive film “The Battle of Mill Springs,” and the film is often used for special events and community gatherings.



Produced by Denver Service Center Planning Division

October 2016

FIGURE 2.1 ASSOCIATED HISTORIC SITES AND RESOURCES OUTSIDE THE STUDY AREA

The Mill Springs Battlefield Association maintains a small research library and museum collection at the visitor center. The collection, the majority of which was donated by late University of Florida Professor Ewald Kockritz, consists of official records, reports, archived letters, diaries, and other documents from soldiers present at the battle. The collection also includes Civil War-related objects and archives related to commemorative activities at the site. The building includes an artifact preparation room, collection storage facilities, and administrative/office space. Exhibit space in the visitor center displays battlefield artifacts, period and reproduction Civil War uniforms and firearms, battle flags, and the remains of the Zollie Tree.



Mill Springs Battlefield Visitor Center and Museum.

Mill Springs National Cemetery

Logan's Cross Roads National Cemetery in Nancy, Kentucky, is one of the original 14 Civil War era national military cemeteries established in 1862. Later renamed Mill Springs National Cemetery in honor of the battle, the seven-acre burial ground is the final resting place of over 2,500 servicemen and women representing every United States armed conflict since the Civil War. One notable burial in the national cemetery is Congressional Medal of Honor recipient Sergeant Brent Woods (1855-1906), a former slave who was a member of Company B, 9th US Calvary Buffalo Soldier during the Apache Wars. Woods was originally buried in an unmarked grave in a local public cemetery and reinterred in Mill Springs National Cemetery with full military honors in 1984. The cemetery is listed in the National Register of Historic Places as part of the Civil War era National Cemeteries multiple properties submission. Contributing structures identified in this nomination include the burial grounds, the circa 1868 wrought-iron gates, and the original circa 1868 perimeter wall.¹⁴ The national cemetery is currently an active military cemetery under the management and jurisdiction of the Department of Veteran Affairs. Because this is an active military cemetery under federal ownership and protection and falls outside the Mill Springs Battlefield National Historic Landmark boundary, this site is excluded from this special resource study.

¹⁴ US Department of Veterans Affairs, "Mill Springs National Cemetery," *National Cemetery Administration*, December 14, 2015, <http://www.cem.va.gov/cems/nchp/millsprings.asp>; National Register of Historic Places, Mill Springs National Cemetery, Nancy, Pulaski County, Kentucky, National Register #98000592.

West-Metcalf House

Built in 1799, the West-Metcalf House is reported to be the oldest building in Wayne County and one of the first brick houses in the region. The residence includes two rooms on the main floor, a second level under the roof, and a cellar equipped with a kitchen/cooking area. The house is located on Old Mill Springs Road roughly a mile south of the Mill Springs Crossing Fortified Ferry Landing Mill Site. During the Civil War, the house was used as a supply depot, and, following the battle of Mill Springs, operated as a temporary field hospital for wounded and dying Confederate soldiers. The building, which is individually listed on the National Register of Historic Places, is well documented as the first Mill Springs-area headquarters used by Generals Zollicoffer and Crittenden, as well as its role as a supply depot and field hospital.¹⁵ In 2010, recognizing the historic significance of this house, the Mill Springs Battlefield completed a full restoration of the house, which is now accessible to the public during group tours and special events. Although not in the NHL designation of the battlefield, the West-Metcalf House is a significant Civil War-era historic structure that played an important role before and after the Battle of Mill Springs and is included in the Battle of Mill Springs updated NRHP documentation. The historic structure should be considered in any proposed alternative.



West-Metcalf House.

¹⁵ National Register of Historic Places, West-Metcalf House, Mill Springs, Wayne County, Kentucky, National Register #77000661.

Updated Battle of Mill Springs National Register of Historic Places Nomination

Continued historical and archeological research, completed after the Mill Springs Battlefield's National Historic Landmark designation, has identified numerous sites and resources associated with the Confederate winter encampment and Battle of Mill Springs. The Battle of Mill Springs Historic District, as defined in the 2009 National Register of Historic Places update, consists of 1,529 acres found in both Pulaski and Wayne Counties. The updated NRHP nomination identifies an additional 811.5 acres associated with the battle that were not included in the designated National Historic Landmark, including a fourth discontinuous area called Timmy's Branch.

In the updated NRHP nomination, the core battlefield area was expanded to include 344 acres west and east along natural ridgelines and south of Last Stand Hill to better encompass the Union and Confederate positions throughout the battle on January 19, 1862. The Beech Grove fortified encampment site was expanded by an additional 339 acres to include archeological resources identified and documented through extensive surveys and research after the Mill Springs National Historic Landmark was designated. Additional research and archeological investigations also revealed the accurate location of Moulden's Hill, approximately 0.75 miles north of where it was previously believed to be. This hill served as the Union artillery position during the bombardment of the Confederate defenses after the battle. Timmy's Branch, the additional fourth area identified in the NRHP update, is a 22-acre site approximately 1.5 miles south of Zollicoffer Park that includes the original site where Union pickets first engaged Confederate troops initiating the battle, remnants of historic Mill Springs Road, and rolling terrain.

The updated NRHP boundary south of Lake Cumberland consists of 184 acres and two notable contributing Civil War-era historic structures described above, the Brown-Lanier House and the West-Metcalf House. Additional historic resources within the NRHP update that are associated with the West-Metcalf House are the West Family Cemetery, approximately 170 acres of farmland between the house and the mill that represents the fertile farmland that originally attracted the Confederate troops to the area, and the viewshed between the West-Metcalf House and Lake Cumberland.

The total area of the updated National Register of Historic Places includes 77 noncontributing resources, most of which are 20th-century agricultural structures that do not affect the battlefield's historic integrity or rural character. These additional lands have excellent integrity of setting, feeling, association, and location related to the 1862 battle.

Chapter 3: Analysis of the Four Criteria for Evaluation



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CHAPTER 3: ANALYSIS OF THE FOUR CRITERIA FOR EVALUATION

INTRODUCTION

This chapter presents the evaluation of the four criteria that must be met for a study area to be considered for designation as a national park unit. The application of these criteria follows agency and legislated guidance outlined in Section 1.3 (*Criteria for Inclusion*) of the *NPS Management Policies 2006* as well as the National Park System New Areas Studies Act (Title III of the National Parks Omnibus Management Act of 1988, PL 105-391; 54 US Code 1005007). For a study area to be considered for designation as a potential new unit of the national park system, it must fully meet the following four criteria for evaluation:

- 1) Possess nationally significant resources,
- 2) Be a suitable addition to the system,
- 3) Be a feasible addition to the system, and
- 4) Require direct NPS management or administration instead of alternative protection by other agencies or the private sector.

These four criteria are analyzed sequentially, and there are several pathways for concluding the study process based on individual criteria findings. The study process may also be truncated if a negative finding is made for any one of these criteria. The findings presented in this chapter will serve as the basis for a formal recommendation from the Secretary of the Interior to Congress on whether or not the study area should be designated as a new unit of the National Park Service. A summary of these findings can be found at the end of this chapter.

EVALUATION OF NATIONAL SIGNIFICANCE

The determination of national significance for a study area is the first step in the special resource study evaluation process. To determine their national significance, historic places or sites being studied for their outstanding cultural resources are evaluated using established National Historic Landmark criteria. More rigorous than the NRHP nomination process, NHL designation serves as official recognition by the federal government of the national significance of a historic property or site. Outlined in 36 CFR Part 65, the NHL designation process for determining national significance is ascribed to districts, sites, buildings, structures, and objects that possess:

1. exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering, and culture; and
2. a high degree of integrity of location, design, setting, materials, workmanship, feeling and association.

In addition, to be eligible for designation as a National Historic Landmark, an area must meet at least one of six “Specific Criteria of National Significance” contained in 36 CFR Part 65:

- Criterion 1: be associated with events that have made a significant contribution to and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or
- Criterion 2: be associated importantly with the lives of persons nationally significant in the history of the United States; or

- Criterion 3: represent some great idea or ideal of the American people; or
- Criterion 4: embody the distinguishing characteristics or an architectural type specimen exceptionally valuable for the study of a period, style, or method of construction, or represent a significant, distinct, and exceptional entity whose components may lack individual distinction; or
- Criterion 5: be composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity or exceptional historic or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or
- Criterion 6: have yielded or may be likely to yield information of major scientific importance by revealing new cultures or by shedding light upon periods of occupation of large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts, and ideas to a major degree.

The use of the NHL criteria to determine national significance is the only link between the special resource study process and the NHL program regulations. It does not confer landmark designation; separate designation processes, governed by other regulations, exist for the NHL program.

Statement of National Significance

The Mill Springs Battlefield study area was officially designated a National Historic Landmark by the Secretary of the Interior in 1994 and is considered to have national significance.¹⁶ The Mill Springs Battlefield qualified for official NHL designation based on *Criterion 1* for its association with significant events in United States history during the American Civil War. The battlefield also met *Criterion 2* for its association with persons nationally significant in the history of the United States, that person being Union Brigadier General George H. Thomas.

In the context of the Civil War, the national significance of the Battle of Mill Springs lies in its timing as well as its consequences on both military strategy and morale. The Battle of Mill Springs followed a summer and fall military campaign season that saw numerous setbacks and defeats for the Union army. Fought on January 19, 1862, the Battle of Mill Springs is considered the first decisive Union victory on the field of battle during the Civil War. While not a major engagement, the victory significantly boosted Northern morale and left Confederate forces in eastern Kentucky disorganized, demoralized, and scattered. The defeat at the Battle of Mill Springs combined with Grant's victories at Fort Henry and Donelson in February 1862, left the Confederate army unable to hold their defensive line in the border state, resulting in a withdrawal from Kentucky by the end of February 1862. Although the Battle of Mill Springs was later overshadowed in its own time by battles at Fort Henry, Fort Donelson, and Shiloh, it set in motion future successes for the Union army in the Western Theater of the war. Union control of Kentucky moved the theater of war into Tennessee and the Deep South, ultimately shifting military strategy and later developments during the Civil War. More importantly, this victory helped solidify Kentucky's position in the Union.

The Battle of Mill Springs is also recognized as Brigadier General George Thomas's first battle as a commanding officer. A graduate of West Point and a veteran of the Mexican-American War, Thomas was also a native Virginian, which had brought questions about his loyalty. When asked by fellow officer William T. Sherman where he would go, Thomas responded, "I'm going South at the head of

¹⁶ National Historic Landmark, Mill Springs Battlefield, southwest of Somerset, south of Nancy, Pulaski and Wayne Counties, Kentucky, National Register #93000001.

my troops.”¹⁷ His actions and leadership at the Battle of Mill Springs inspired confidence in his superior officers, proving his loyalty and that a Virginian could successfully command a Union field army.¹⁸ Thomas spent the majority of the war in the Western Theater fighting at Shiloh, and the battles of Perrysville, Stone’s River, and Chickamauga, where he earned the nom-de-guerre “The Rock of Chickamauga” after holding the left flank of Snodgrass Hill and protecting the Army of the Cumberland. His second and last battle as a commanding officer came in 1864 at the Battle of Nashville. Although not as famous or well known as other Union Generals, Thomas is recognized as a loyal and capable officer with an outstanding war record.

While the Mill Springs Battlefield’s national significance was recognized with its 1994 designation as a National Historic Landmark, archeological research and investigations have revealed a wealth of new information about the battle, troop movements, and the Confederate winter encampment at Beech Grove. Research within and outside the NHL boundary expanded scholarly understanding about the historic events that occurred leading up to, during, and after the battle. In light of the valuable information found in the archeological record and the resulting insight into the battle, an updated NRHP nomination was completed in 2009. This updated NRHP documentation also recognizes the national significance of the Mill Springs Battlefield Study Area under *Criteria D: That have yielded or may be likely to yield, information important in history or prehistory of the NRHP criteria for evaluation*, because of its intact archeological record, and its potential to provide important data in the future.

Study Finding on Criterion 1 - National Significance

When national significance is evaluated in congressionally authorized special resource studies, a study area that is listed as a National Historic Landmark is considered to be nationally significant based on this designation and requires no further analysis to affirm significance. The Mill Springs Battlefield was designated by the Secretary of the Interior as a National Historic Landmark in 1994 for reasons identified in the official NHL nomination. The Mill Springs Battlefield study area therefore meets the first criterion of national significance established for consideration as a new unit of the national park system.

EVALUATION OF SUITABILITY

A study area is considered suitable for addition to the national park system if it represents a natural or cultural resource type that is not already adequately represented in the national park system or is not comparably represented and protected for public enjoyment by other federal agencies, tribal, state or local governments, or the private sector.

Adequacy of representation is determined by comparing the study area to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. This comparative analysis should also address the rarity of the resources, interpretive and educational potential, and similar resources already protected in the national park system or in other public or private ownership. The comparison results in a determination of whether the study area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas. Based on this determination, a finding on suitability is made.

¹⁷ Thomas L. Briener, “The Battle of Mill Springs,” Cincinnati Civil War Round Table, March 21, 1996, http://www.cincinnatiwrt.org/data/ccwrt_history/talks_text/breiner_mill_springs.html

¹⁸ National Register of Historic Places, Battle of Mill Springs Historic Areas (Boundary Increase and Additional Documentation), Section 8, p 11-12.

The following methodology was used to evaluate the suitability of the Mill Springs Battlefield study area for potential designation as a unit of the national park system:

1. Define the **type of resource represented by the study area**.
2. Identify the **theme or context in which the study area fits**.
3. Identify **sites that represent the resource type** within the national park system, and similar sites protected by other agencies, state, local or tribal governments, and the private sector.
4. Through a **comparative analysis**, describe how the resource type is represented.
5. Consider **adequacy of representation** and determine whether the resource will duplicate, enhance, or expand opportunities for visitor use or resource protection.

Type of Resource Represented by the Study Area

Designated as a National Historic Landmark, the Mill Springs Battlefield study area is recognized as having national significance because of its association with Civil War history as well as the site of a significant battlefield during this conflict. As outlined in chapter 2 of this study, the study area boundary includes three discontinuous sites in Pulaski and Wayne Counties, Kentucky, related to the 1861 Confederate fortified winter encampment and the January 19, 1862, battlefield. Types of resources found in the study area include battlefield landscape features and historic structures associated with these events as well as significant archeological resources associated with the Confederate encampment and earth fortifications. At Zollicoffer Park, a monument and a number of commemorative features associated with the Civil War can also be found. Together these resources are a tangible connection to the history of the Civil War and are an important source of historic data about the early days of the American Civil War in Kentucky.

Theme or Context in which the Study Area Fits

Under the Revisions of the National Park Service's Thematic Framework (1996), the Mill Springs Battlefield Study Area is associated with the following theme and theme topics:

Theme IV. Shaping the Political Landscape

- Military Institutions and Activities

In 1993, the Civil War Sites Advisory Commission released a report identifying historically significant Civil War battlefields and determining their importance, current condition, and potential threats to their integrity. Out of the approximately 10,500 armed conflicts that took place during the Civil War, the report singled out only 384 (3.7%) as principal battles based on their influence. Those principal battles were then classified based on their importance to individual campaigns and the overall Civil War as a whole, with class A and B battlefields representing principal strategic operations of the war and class C and D battlefields usually representing operations with limited tactical objectives of enforcement and occupation.¹⁹ Preservation priorities were then assigned based on battlefield class, level of integrity and threats, and amount of core battlefield area already protected by federal and state agencies or nonprofit organizations.

The Mill Springs battlefield is one of 11 Kentucky battlefields included in the commission's report and is classified as a class B battlefield, "having direct and decisive influence on its campaign." The report considers Mill Springs part of the Breaking the Confederate Barrier in the Western Campaign, which consists of two distinct offensives: 1) the January 1862 Union Offensive in Eastern Kentucky,

¹⁹ Civil War Sites Advisory Commission, *Report on the Nation's Civil War Battlefields: Technical Volume I: Appendices*, Revised Edition, National Park Service, Washington, DC, 1997.

and 2) the resulting Federal Penetration up the Cumberland and Tennessee Rivers that took place in February–June 1862. The campaign includes four major battles: Middle Creek, Kentucky; Mill Springs, Kentucky; Fort Henry (and Heiman), Tennessee/Kentucky; and Fort Donelson, Tennessee.²⁰ Fort Donelson, a class A battlefield recognized by the commission as “having a decisive influence on a campaign and direct impact on the course of the war,” is protected as a National Park Service unit. Middle Creek is listed as a class C battlefield, “having observable influence on the outcome of a campaign.” These battlefields are included in the comparative analysis below. The remnants of Fort Henry, considered a class B battlefield, are part of the Land Between the Lakes National Recreation Area managed by the Department of Agriculture and the US Forest Service. The fort site is submerged under Kentucky Lake and has lost its historic integrity.

Other Kentucky battlefields identified by the commission are associated with Operations in Eastern Kentucky in late 1861, the Confederate Heartland Offensive of August–October 1862, and Morgan’s Raid into Kentucky in June 1864. Perryville Battlefield, associated with the Confederate Heartland Offensive, is the only class A battlefield in the state. As of the report, three of Kentucky’s eleven historically significant battlefields had lost integrity because of fragmentation and development.²¹ Based on the report findings, Mill Springs and Perryville battlefields were ranked as Priority I for preservation, recognizing the critical need for additional land and resource protection as of the report’s 1993 release.²²

In recent years, the National Park Service has worked to identify gaps in the national park system, related to the cultural resources and values that reflect our country’s diverse national history. While the National Park Service cannot be expected to protect all important resources, it should strive to address missing stories and work with other organizations toward a more fully represented system. The 2017 NPS system plan identified war and armed conflict as a theme that stands out as more heavily represented in the existing system. In particular, 54 units of the national park system (13% of the total units) are related to the Civil War. The Battle of Mill Springs fits firmly within this Civil War theme because it was the first in a string of Union victories that pushed the Confederate army south—eventually out of both Kentucky and Tennessee.

Comparative Analysis of Resources Similar to the Study Area

In addressing the suitability criteria, a comparative analysis is needed to determine if similar resource protection and visitor opportunities are already offered by other NPS units or other land management entities. The Mill Springs Battlefield study area represents an early Civil War battle within the contentious border state of Kentucky and contains extensive archeological remains of Confederate earthen fortifications and winter quarters. Protected Civil War battlefields in Kentucky could include resources similar to those found within the Mill Springs Battlefield study area.

Within the National Park Service, Cumberland Gap National Historical Park and Fort Donelson National Battlefield represent the same geographic area and themes identified with the Mill Springs Battlefield study area, so these two park units were moved forward for comparative analysis. Other Civil War sites in Kentucky protected by state agencies and other nonfederal entities with similar themes were also identified and considered for comparison. These included Middle Creek National Battlefield, Battle of Richmond Visitor Center and Battlefield Park, Perryville Battlefield State Historic Site, and Camp Nelson Civil War Heritage Park.

²⁰ Civil War Sites Advisory Commission, *Report on the Nation’s Civil War Battlefields: Technical Volume II: Battle Summaries*, Revised Edition, National Park Service, Washington, DC, 1997.

²¹ Civil War Sites Advisory Commission, *Report on the Nation’s Civil War Battlefields: Technical Volume I: Appendices*, Revised Edition, National Park Service, Washington, DC, 1997,

²² Civil War Sites Advisory Commission, *Report on the Nation’s Civil War Battlefields: Technical Volume I: Appendices*, Revised Edition, National Park Service, Washington, DC, 1997, Table 7.

Similar Resources Within the National Park System

Cumberland Gap National Historical Park. Cumberland Gap National Historical Park was established to preserve, protect, and interpret the geological “doorway to the west” through the southern Appalachian Mountains, together with the natural, historic, and cultural features that have made the area integral to and symbolic of centuries of American history. Located on the borders of Kentucky, Tennessee, and Virginia, the Cumberland Gap sits at a crossroads between three states and provides access through the Appalachian Mountains, making it of strategic importance and a valuable military objective throughout the Civil War. The Cumberland Gap changed hands several times during the war, with the Confederacy seeing it as a critical defensive position and the Union viewing it as the gateway to the pro-Union supporters in eastern Tennessee. Confederate control of the Cumberland Gap was an integral part of General Johnston’s strategy in Kentucky, anchoring the eastern half of his defensive line. General Zollicoffer was assigned the task of protecting the Cumberland Gap, and his forces used this transportation corridor to enter eastern Kentucky in 1861. Despite its strategic value, no major Civil War battles were fought at the Cumberland Gap.

While Cumberland Gap National Historical Park is not traditionally considered a “Civil War park,” the Cumberland Gap was central in the military strategies of both the Union and Confederacy, with both sides seeing the passageway through the Appalachian Mountains as the key to controlling the Western Theater of the war as well as crucial supply routes. Early Civil War campaigns including the Union Offensive in Eastern Kentucky, the Federal Penetration up the Cumberland and Tennessee Rivers, and the Confederate Heartland Offensive, relied on controlling or moving through the Cumberland Gap. Civil War history is regularly interpreted at Cumberland Gap National Historical Park through NPS programming, wayside signage, and special events.

The Mill Springs Battlefield Study Area is thematically connected to Cumberland Gap National Historical Park as part of the Union Offensive in Eastern Kentucky. However, the study area offers an immersive battlefield experience not currently found at Cumberland Gap National Historical Park. The battlefield landscape at Mill Springs illustrates how an individual battle can decide the fate of an entire campaign and shift military objectives. The decisive victory eliminated the Confederate threat in the eastern half of Kentucky, allowing the Union army to shift its attention to the Tennessee and Cumberland Rivers. The battlefield resources found in the study area would enhance and expand the current interpretation of the Civil War in Kentucky and its connections to the Cumberland Gap. The Mill Springs Battlefield study area offers visitors a different experience, complete with battlefield landscape, in which to understand the importance of the Cumberland Gap as well as the entire state of Kentucky in the context of the Civil War and how it was fought.

Fort Donelson National Battlefield. Fort Donelson National Battlefield protects the historic resources associated with the February 1862 Campaign of Forts Henry, Heiman, and Donelson, and conveys the significance of these events in the continuum of history. After seceding from the Union in May 1861, the state of Tennessee in an alliance with the Confederate States of America prepared to defend its northern border by constructing forts Henry, Heiman, and Donelson on the Tennessee and Cumberland Rivers. By early 1862, these forts helped anchor the western half of the Confederate defensive line that ran through southern Kentucky. With Confederate forces in eastern Kentucky scattered after the defeat at Mill Springs, the Union launched another offensive this time on the western half of the Confederate’s defensive line, with the goal of securing the Tennessee and Cumberland rivers.

Brigadier General Ulysses S. Grant, in partnership with the Federal Navy, moved his troops from Cairo, Illinois, and seized Fort Heiman in Kentucky on the western side of the Tennessee River, and Fort Henry, located in Tennessee and poorly situated in a flood-plain on the eastern bank. After over an hour of naval bombing, Union forces captured forts Henry and Heiman on the afternoon of February 6, 1862. Fort Henry's fall gave Grant the confidence to attack the larger, better situated, and better fortified Fort Donelson. A February 12 skirmish of the Union ironclad *Carondelet* against Confederate river batteries escalated to full gunboat engagement on February 14 and resulted in a resounding Confederate victory and Union naval defeat. On February 15, the Confederates launched a surprise attack on Grant's right flank. Grant was able to recover the disorganized federal line while Confederate leadership waived, leading to the Confederate "unconditional and immediate surrender" that Grant demanded on February 16, 1862. Both the Tennessee and Cumberland rivers were open to Union advancement into the heart of the Confederacy. The victories at forts Henry, Heiman, and Donelson bolstered the Union cause, overshadowing the Battle of Mill Springs. With the fall of the Tennessee and Cumberland rivers forts, the Confederacy abandoned southern Kentucky and much of central and western Tennessee.

The Battle of Mill Springs helped set the stage for the Union victory at forts Henry, Heiman, and Donelson. General Zollicoffer's death at the Battle of Mill Springs and the subsequent retreat of remaining Confederate forces in eastern Kentucky severely weakened the rest of the defensive line, leaving it vulnerable to attack. Within weeks of the victory at Mill Springs, Union forces to the west mobilized to attack the crumbling defensive line. The capture of the river forts interpreted at Fort Donelson National Battlefield and the rest of the Federal Penetration up the Cumberland and Tennessee Rivers Offensive may not have been possible without the earlier Union victory at Mill Springs less than a month before.

Fort Donelson National Battlefield includes approximately 850 NPS-owned acres of the Fort Donelson site in Dover, Tennessee, and more than 170-acres of the Fort Heiman site in New Concord, Kentucky. The two units of the park protect cultural and natural resources associated with the battles including Fort Donelson, Confederate earthworks and fortifications, Civil War-era structures, a post-battle federal fortification, early 20th-century commemorative landscape features, and the Fort Donelson National Cemetery. Much like the Mill Springs Battlefield, Fort Donelson contains historic and archeological resources from the early years of the American Civil War.

Although the resources found at Fort Donelson National Battlefield and the Mill Springs Battlefield study area are similar in nature, they tell the story of two different military offensives that used very different tactics. The defining moment in the Union Offensive in Eastern Kentucky, the Battle of Mill Springs was a land battle fought on one day while the Federal Penetration up the Cumberland and Tennessee Rivers Offensive witnessed a joint military effort between the Union army and Navy gunboats on fortified defenses. Grant would use this strategy numerous times throughout his career in the Western Theater. Thematically and historically, the Mill Springs Battlefield study area has many connections to Fort Donelson National Battlefield. Combined, the Mill Springs Battlefield study area and Fort Donelson National Battlefield illustrate how one battle can influence future military strategy, shifting the entire course of the Civil War. The Mill Springs Battlefield would enhance visitor opportunities to understand the relationship between the Union Offensive in eastern Kentucky and the Federal Penetration up the Cumberland and Tennessee Rivers.

Big South Fork National River and Recreation Area. Big South Fork National River and Recreation Area encompasses approximately 125,000 acres of rugged terrain within the Cumberland Plateau of north central Tennessee and southeastern Kentucky. The area is nestled along the east side of the Daniel Boone National Forest approximately 60 miles south of Mill Springs Battlefield. The recreation area was established in 1968 to preserve the free-flowing condition of the Big South Fork of the Cumberland River, provide diverse recreational opportunities, and to protect the unique scenic, natural, and cultural resources of the area. As a recreation area, Big South Fork's focus is on protecting resources associated with the river while providing nearby populations ample water- and land-based recreational opportunities.

A Civil War theme study completed in 2012 outlines Civil War activity within the park unit for local teachers and park interpretive staff to incorporate into their educational materials.²³ The majority of wartime activity near Big South Fork was limited to guerilla warfare and small skirmishes between troops and local partisans, two of the themes highlighted in the study. The Battle of Mill Springs was the only large Civil War battle to take place in the Upper Cumberland Plateau. While Big South Fork National River and Recreation Area is the closest NPS unit to the study area and has some interpretive ties to the Civil War, the recreation area and Mill Springs Battlefield represent different Civil War events that occurred within the Cumberland Plateau region.

Similar Resources Outside the National Park System

Middle Creek National Battlefield. The Battle of Middle Creek preceded the Battle of Mill Springs during the Union Offensive in Eastern Kentucky, taking place on January 10, 1862. Brigadier General Humphrey Marshall, a cavalry commander during the Mexican-American War, moved his forces into eastern Kentucky late in 1861 to help secure the area for the Confederacy and recruit volunteers. Union leadership ordered Colonel James A. Garfield, an Ohio college professor who was untested in battle, to push Marshall from Kentucky back into Virginia. Garfield's pursuing Union forces encounter their Confederate counterparts near the mouth of Middle Creek. The Union's piecemeal attacks throughout the day were enough to result in Marshall's retreat. This Union victory showed the vulnerability of the Confederate's position in Kentucky, a weakness that was further exploited a week later at the Battle of Mill Springs. For his surprise victory over a veteran general, future US President James A. Garfield received a promotion to Brigadier General. The battlefield was designated a National Historic Landmark in 1992.

Middle Creek National Battlefield is located in Prestonsburg, Kentucky, approximately 125 miles northeast of Mill Springs Battlefield Study Area. Two hundred and fifty-five acres of the battlefield are protected by the nonprofit Middle Creek National Battlefield Foundation, Inc. Several self-led visitor opportunities are available on the ten acres of publically accessible battlefield including two loop trails with interpretive signage, an information kiosk, and a four-mile auto tour with stops at sites associated with the battle.

Both Middle Creek and Mill Springs represent battles fought in January 1862 along the eastern half of the Confederate Defensive Line. Both battlefields maintain a high level of integrity in terms of landscapes and setting. Together the outcomes at Middle Creek and Mill Springs bolstered Union morale and provided confirmation that the Confederate Defensive Line across Kentucky was ineffective and vulnerable to attack. Although Middle Creek Battlefield is a National Historic Landmark and is recognized as nationally significant for its role in the American Civil War, the Civil War Sites Advisory Commission classifies it as a class C battle. Class C battles are defined as having

²³ W. Stephen McBride, "The Civil War in the Upper Cumberland Plateau and its Effects on the Local Population: A Guide of the major events and themes, for teachers and interested citizens of the Upper Cumberland Plateau of Tennessee and Kentucky," November 2012, Kentucky Archeological Survey – University of Kentucky.

observable influence on the outcomes of an individual campaign, while class B battles like those at Mill Springs and Fort Donelson are considered to have direct and decisive influence on their campaigns. The disintegration of the Confederate army in eastern Kentucky after the Battle of Mill Springs and General Crittenden's retreat to Murfreesboro, Tennessee, directly contributed to the success of the Union Offensive in Eastern Kentucky and significantly influenced the following Federal Penetration up the Cumberland and Tennessee Rivers Offensive beginning in February 1862.

Battle of Richmond Visitor Center and Battlefield Park. Battle of Richmond Visitor Center and Battlefield Park commemorates the Civil War battle that was fought from August 29 to 30, 1862, near Richmond, Kentucky, approximately 60 miles northeast of the Mill Springs Battlefield Study Area. During the summer of 1862, Confederate General Bragg mounted an offensive into Kentucky in an attempt to call Union attention away from the Southern strongholds of Vicksburg and Chattanooga as well as recruit additional supporters to the Southern cause. The Battle of Richmond, as the first major battle of the Confederate Heartland Offensive, was an important Confederate victory that established new inroads into the state of Kentucky.

The battlefield is protected and interpreted by the nonprofit Battle of Richmond Association working with the Madison County Fiscal Court. The park features several historic structures, an approximately 1.5-mile walking trail with interpretive markers, and regular interpretive events such as reenactments and living history programs. There is also a visitor and history center located approximately 0.5 miles away that allows visitors to understand the importance of the battle through interpretive materials (e.g., maps, films, artifacts, etc.).²⁴

While the battles at Mill Springs and Richmond both represent the Civil War in Kentucky, the sites themselves represent very different campaigns with very different outcomes. The Battle at Mill Springs was part of a string of early Union victories that pushed Confederate forces out of Kentucky during the Union Offensive in Eastern Kentucky, reinforcing Kentucky's position in the Union, and moving the Western Theater of war into Tennessee. The Battle of Richmond was part of the later Confederate Heartland Offensive, the Confederacy's attempt to regain Kentucky after being handed major blows at Mill Springs and forts Henry and Donelson earlier in the year. The Battle of Richmond is considered to be one of the most decisive and complete Confederate victories of the war, propelling the Confederates forward toward the Battle of Perryville. There are a number of differences between these two Civil War battles and each represents an important yet distinct milestone in the Civil War history of Kentucky.

Perryville Battlefield State Historic Site. Perryville Battlefield State Historic Site, located approximately 50 miles northwest of Mill Springs, is the culmination of the Confederate Heartland Offensive of 1862 described above. Fought on October 8, 1862, the Battle of Perryville is often referred to as the "High Water Mark" for the Confederacy in the West, because, like Gettysburg, it was the northernmost point in this theater of the Civil War. While the Battle of Perryville was considered a Confederate tactical victory, the high number of casualties and the strength of the Union army forced Bragg to retreat out of Kentucky through the Cumberland Gap.²⁵ Perryville was the largest Civil War battle to take place in Kentucky in terms of battlefield size and number of soldiers engaged and resulted in over 7,600 estimated casualties. The battlefield was designated a National Historic Landmark in 1966.²⁶

²⁴ National Park Service, *Kentucky Lincoln National Heritage Area Feasibility Study*, September 2014.

²⁵ Civil War Trust, "10 Facts about Perryville," *Civil War Trust*, <http://www.civilwar.org/battlefields/perryville/perryville-history-articles/10-facts-about-perryville.html>.

²⁶ National Historic Landmark, Perryville Battlefield, west of Perryville, Boyle County, Kentucky, National Register #66000356.

The Perryville Battlefield State Historic Site encompasses nearly 1,000 acres of the core battlefield, making it the largest preserved battlefield in Kentucky. The state park includes a visitor center with museum, a Confederate monument and cemetery, a Union monument, over 10 miles of trails, over 50 interpretive panels, a picnic shelter, and a playground. An annual reenactment and commemorative event is held at the site in October and elementary school programs are available. The nonprofit friends group Perryville Battlefield Preservation Association was created in 1991 and works with the historical site and the City of Perryville on preservation and land acquisition efforts.

Both battlefields protect significant Civil War resources in the state of Kentucky and provide insights into the war in the border state. However, they both represent different campaigns as well as crucial turning points in the Western Theater of the Civil War. The Battlefields of Perryville and Mill Springs commemorate Kentucky's role in the Civil War but, like the Richmond Battlefield, represent very different campaigns at different times in the war with very different outcomes. The Mill Springs Battlefield study area represents the first significant Civil War campaign in Kentucky that dislodged the Confederate presence in the state and shifted the warfront into Tennessee. The Battle of Perryville reflects the height of the Confederate Heartland Campaign, the second major military offensive in the state, as Confederate forces tried to reestablish their presence in the border state and move the theater of war back into the north. Perryville Battlefield State Historic Site's historic and archeological resources are directly connected to the October, 1862, battle, while the Mill Springs and Beech Grove archeological sites provide information about the Confederate's winter encampment as well as the January 1862 battle.

Camp Nelson Civil War Heritage Park. Camp Nelson Civil War Heritage Park is a historical museum and park in Jessamine County, Kentucky, approximately 60 miles north of the Mill Springs Battlefield study area. Camp Nelson, constructed in 1863, operated as a supply depot for the Union army in Kentucky, and, more significantly, as a recruitment and training center for African American soldiers following the Emancipation Proclamation.²⁷ While the original camp contained approximately 300 buildings and fortifications, many of the structures were dismantled and sold after the camp was officially closed in 1866. The heritage park, which is owned and managed by the nonprofit Camp Nelson Restoration and Preservation Foundation, encompasses 525 acres of the Camp Nelson Historic and Archeological District, a National Historic Landmark with significance as one of the nation's largest recruitment and training centers for African American soldiers during the Civil War, as well as a refugee camp for wives and children of these soldiers.²⁸ The park primarily protects and interprets the site's archeological resources and the Oliver Perry House, the only remaining structure dating to the Civil War. Primary visitor opportunities include more than 5 miles of interpretive trails, an interpretive center, a house museum, and a range of interpretive programs and events.

Both Camp Nelson and Mill Springs Battlefield contain nationally significant archeological resources, but the sites represent different time periods and aspects of the Civil War. Camp Nelson and its connection to African American soldiers represent an essential component in the history of emancipation and the significant contributions of African Americans to the Civil War. The Mill Springs Battlefield study area represents the early years of the war and includes the remnants of an 1861–1862 Confederate winter encampment, the site of the 1862 battle, and resources connected to local life in Pulaski and Wayne Counties, Kentucky. These sites represent different periods of the Civil War, protect different Civil War resources, and offer different interpretation opportunities.

²⁷ Camp Nelson Restoration and Preservation Foundation, "Camp Nelson Historical Significance," <http://www.campnelson.org/history/significance.htm>.

²⁸ National Historic Landmark, Camp Nelson Historic and Archeological District, Address Restricted, Jessamine County, Kentucky, National Historic Landmark System ID #13000286.

Adequacy of Representation

The comparative analysis presented in this special resource study places the unique historic context and different resources at the Mill Springs Battlefield study area within the larger picture of the Civil War and American history. By comparing and contrasting the study area to other similar historic Civil War sites, the suitability of the Mill Springs Battlefield to expand and enhance visitor understanding of the Civil War becomes clear.

The Mill Springs Battlefield study area would fill a gap in the national park system by providing an opportunity to preserve the site of the first decisive Union victory in the Western Theater of the Civil War as well as interpret the strategic importance and impacts of the war on the border state of Kentucky. Although Kentucky witnessed numerous cavalry raids throughout the Civil War, the study analysis focused on three major military campaigns: 1) Union Offensive in Eastern Kentucky, 2) Federal Penetration of the Cumberland and Tennessee Rivers, and 3) Confederate Heartland Offensive. Throughout these campaigns, there were numerous individual battles that reflected both the Union and Confederacy's military objective of controlling Kentucky. As one of the first military campaigns of the Western Theater, the success of the Union Offensive in Eastern Kentucky was critical in setting future battles in motion and moving the war farther south. The victory at Mill Springs helped to secure Kentucky's loyalty to the Union and set the tone for battles to come in the Western Theater. Currently, there are no other national park units in Kentucky that focus solely on the military actions and Civil War stories of the border state.

The Mill Springs Battlefield study area enhances the current interpretation offered at other NPS units and other battlefield sites. Leading up to the Battle of Mill Springs, top leaders and generals on both sides of the conflict recognized Kentucky's unique position and wealth of resources. A state geographically and ideologically wedged between the Union and the Confederacy, Kentucky declared its neutrality early in the war. However, its extensive transportation network, ample river access, and prime location led to both Union and Confederate forces setting up strongholds in the state by late 1861. For the next year, forces jostled for control of the border region during the Union Offensive in Eastern Kentucky, the Federal Penetration up the Cumberland and Tennessee Rivers, and the Heartland Offensive. While individual battlefields interpret military campaigns and Cumberland Gap National Historical Park talks about the gap's role in the American Civil War, the Mill Springs Study Area can tell its own unique story as embodied in its battlefield landscape, Confederate fortified encampment, and other historic resources.

The battlefield landscape, Confederate fortified encampment and historic structures at Mill Springs expand opportunities for visitors and researchers to understand different aspects of life during the Civil War at one location. All of the sites chosen for comparative analysis in this study protect significant Civil War resources, including battlefields, historic structures, and extensive archeology. However, only the Mill Springs Battlefield study area includes the combination of a long-term Confederate winter encampment, earthen fortifications, a battlefield, and historic structures. The study area contains rare archeological resources at the Beech Grove Confederate Encampment that date to the winter of 1861–1862, the likes of which are not currently protected by the National Park Service or another land management agency. Surviving Civil War era houses located in the study area, as well as the expanded Mill Springs NRHP boundary, add an additional layer of interpretation and offer a unique opportunity to explore civilian life in a border state. The combination of resources found at Mill Springs differs from other sites protected by the National Park Service or another entity, offering a unique visitor experience and interpretive opportunity.

After conducting a comparative analysis of similar sites and resources, it appears that the Mill Springs Battlefield study area represents a unique period within the arc of Civil War history and contains

resources associated with this history that are not comparably protected by the National Park Service, other federal agencies, state or local governments, or nonprofit organizations.

Study Finding on Criterion 2 - Suitability

Based on the comparative analysis presented above, the Mill Springs Battlefield study area fills a number of gaps in the National Park Service's representation of the Civil War in the border state of Kentucky. While other national parks and public sites in Kentucky and Tennessee protect and interpret Civil War battles, the Mill Springs Battlefield Study Area expands and enhances opportunities for resource protection and interpretation related to the military strategies employed during the early days of the Civil War and the civilian perspective in a border state where residents were sharply divided between the Union and Confederate causes. Because the study area would expand and enhance resource protection and the interpretation of the Civil War offered within the national park system and by other entities, the Mill Springs Battlefield study area is considered suitable for inclusion in the national park system under this criterion.

EVALUATION OF FEASIBILITY

An area that is nationally significant and meets the suitability criterion must also meet the feasibility criterion to qualify as a potential addition to the national park system. To be feasible as a new unit, an area's natural systems or historic settings must be of sufficient size and appropriate configuration to ensure long-term protection of the resources and visitor enjoyment (taking into account current and potential impacts from sources beyond its boundaries) and be capable of efficient administration by the National Park Service at a reasonable cost. A variety of factors may affect feasibility, including landownership, acquisition costs, access, threats to the resource, and staff or development requirements. The feasibility evaluation must also consider the ability of the National Park Service to undertake new management responsibilities in light of current and projected availability of funding and personnel.

For an area to be considered feasible as a new unit of the national park system, a variety of factors must be taken into account. In evaluating feasibility for Mill Springs Battlefield, the National Park Service considered the following factors:

- size and boundary configuration
- landownership, local planning and zoning, and potential land uses
- current and potential threats to the resources
- access and public enjoyment potential
- public support and socioeconomic impacts of designation
- cost and budgetary feasibility

Although the above factors are considered individually in the following sections, the overall evaluation of the feasibility of establishing a new unit of the national park system at the Mill Springs Battlefield is based on taking into account all of the above factors in the context of current National Park Service management. The evaluation of these factors under criterion 3 must consider if the National Park Service can feasibly manage the proposed new park unit given current agency-wide limitation and constraints.

Size and Boundary Configuration

The National Defense Authorization Act of 2015 (PL 113-291) directs the Secretary of the Interior to use the boundary of the Mill Springs Battlefield National Historic Landmark as the boundary for the study area in this special resource study. The Mill Springs Battlefield National Historic Landmark,

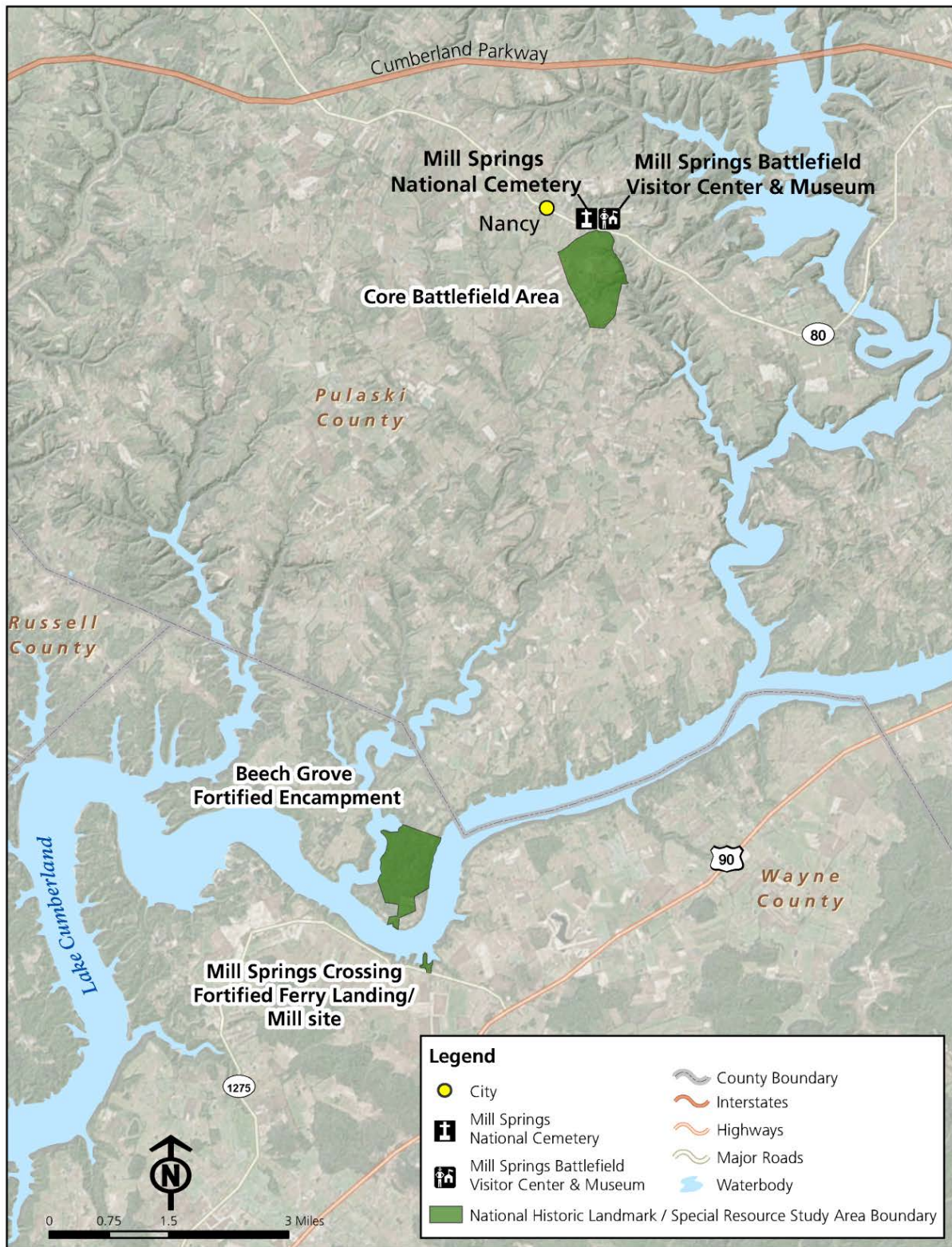


FIGURE 3.1 MILL SPRINGS BATTLEFIELD NATIONAL HISTORIC LANDMARK

designated in 1994, includes 647.5 acres separated into three discontinuous areas related to three key aspects of the battle (figure 3.1). As described earlier in this study, the three areas include: 1) the core battlefield, 2) Beech Grove fortified encampment, and 3) Mill Springs crossing fortified ferry landing / mill site. The core battlefield unit includes 320 acres where the majority of fighting took place and geographic landmarks and road alignments identified in historic maps and the after action reports found in *The War of the Rebellion: A Compilation of the Official Records of the Union and Confederate Armies*. The 320-acre Beech Grove fortified encampment area protects the remaining evidence of the Confederates 1861-1862 earthworks and documented archeological resources. The ferry landing site overlaps with the land and resources protected as the Army Corps of Engineers-managed Mill Springs Park. Together, the 647.5 acre study area reflects a boundary configuration of sufficient size and configuration to protect the nationally significant resources identified in the National Historic Landmark designation.

The Civil War Sites Advisory Commission and the American Battlefield Protection Program were created in 1991 to identify historically significant Civil War sites, determine the sites' relative importance and current condition, assess threats to the sites, and recommend preservation and interpretation alternatives in the hopes of creating a national strategy for Civil War battlefield preservation. Initial NPS ABPP research related to the Battle of Mill Springs was conducted in the early 1990s and reflected in *The Civil War Sites Advisory Commission Report on the Nation's Civil War Battlefields* released in 1993. This information provides the basis for the Mill Springs Battlefield National Historic Landmark documentation completed in 1994. In the 2000s, Congress directed the American Battlefield Protection Program to revisit the Civil War Sites Advisory Commission report and document changes in conditions and preservation activities associated with battlefields originally examined in the 1990s. The American Battlefield Protection Program resurveyed Kentucky's Civil War battlefields in 2005 and shared its findings related to the condition of the battlefield and preservation activities in *Update to the Civil War Sites Advisory Commission Report on the Nation's Civil War Battlefields – Commonwealth of Kentucky* published in October 2008.

In the study update, American Battlefield Protection Program incorporated data from recent research and refined survey methods to revise the program's study area, core area, and potential NRHP boundary for Mill Springs Battlefield. The ABPP study area is defined as the historic extent of the battle, including resources related to troop movements and activities that related or contributed to the battle event, regardless of the battle site and resources' present integrity. (See figure 3.2) The core area represents the area of fighting on the battlefield, sometimes called "hallowed ground." The potential NRHP boundary includes the resources within the broad study area that retain enough integrity to convey the site's historic sense of place. As part of the 2005 resurvey, the ABPP study area was expanded to 4,434.58 acres to include the routes troops took to and from the core battlefield and the West-Metcalf House, a Confederate hospital and supply depot considered an associated resource outside the special resource study area. The ABPP core area was updated to include 1,193.70 acres of land at the battlefield, Beech Grove encampment, and the Mill Springs ferry landing. This updated ABPP core area boundary was used to inform the 2009 Battle of Mill Springs Historic Areas NRHP update. The American Battlefield Protection Program also expanded the potential NRHP area to 1,749.35 acres. This area extends outside the boundaries of the National Historic Landmark and the 2009 NRHP updated documentation. According to the study update, "lands assigned [potential national register] boundaries should be considered worthy of future attention, although future evaluations may reveal more or less integrity than indicated by the ABPP surveys."

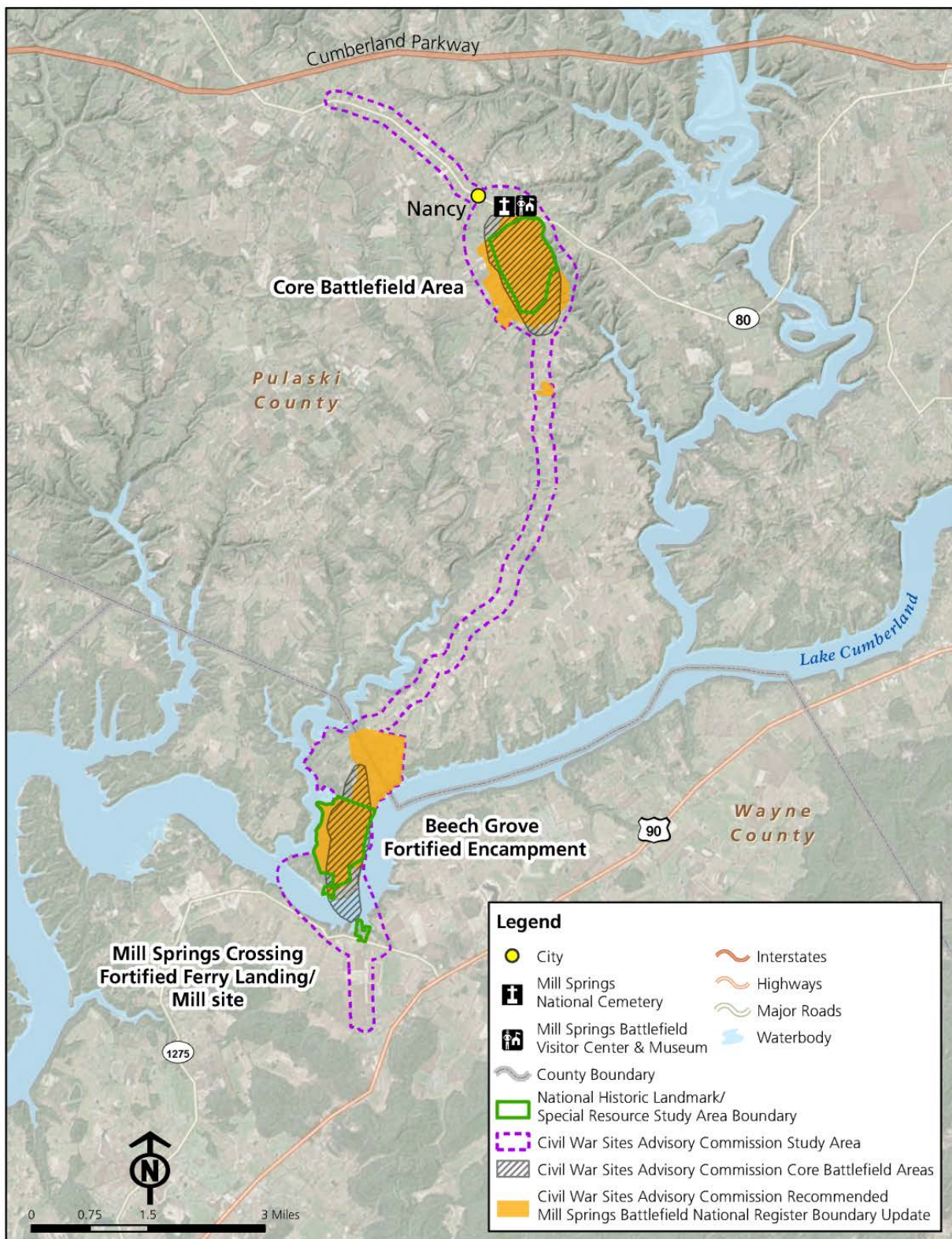


FIGURE 3.2 CIVIL WAR SITES ADVISORY COMMISSION – MILL SPRINGS BATTLEFIELD STUDY AREA.

As described earlier in this special resource study, the 2009 updated NRHP documentation includes additional lands and nationally significant archeological resources and historic structures identified through ongoing research conducted after the battlefield's 1994 National Historic Landmark designation. The expanded NRHP boundary includes 1,529 acres and closely follows the core area identified by the American Battlefield Protection Program during its 2005 Kentucky battlefields survey. In the updated NRHP documentation, the Mill Springs core battlefield area was expanded to 664 acres in light of recent archeological evidence that fighting pushed further east, west, and south than historians originally believed. The updated Beech Grove fortified encampment area was expanded to 659 acres to encompass the site of the final Union offensive action at Moulden's Hill, which was discovered to be approximately 0.75 miles north of the National Historic Landmark boundary. The Mill Springs crossing fortified ferry landing / mill site grew to 184 acres, including the West-Metcalf House, adjacent farmland, and viewsheds toward the mill and Lake Cumberland. A fourth discontinuous area, the 22-acre site at Timmy's Branch where the first shots of the battle were fired, was also added in the NRHP nomination boundary.

Based on the special resource study's legislated mandate, the study area was limited to the area outlined in the 1994 National Historic Landmark designation. However, any proposed national park unit boundaries should consider resources within the updated 2009 NRHP boundary, the ABPP core area, and the ABPP potential NHRP boundary for possible inclusion based on their national significance and importance to understanding the Battle of Mill Springs. The updated NRHP nomination describes important historic sites, archeological resources, and historic structures outside the 1994 National Historic Landmark boundary that illustrate the full scope of the battlefield and represent the battlefield and mill site's rural setting. The updated NRHP boundary is approximately double the size of the current special resource study area. The Mill Springs Battlefield Visitor Center, which was strategically located outside of the National Historic Landmark in order not to impact the historic context of the battlefield, may also need to be considered in any proposed national park unit boundary. Including the current visitor center in any future boundary configuration would limit visitor facility development within the National Historic Landmark where significant archeological resources and cultural landscapes may be affected.

Although the Mill Springs crossing fortified ferry landing / mill site is separated from the core battlefield and Beech Grove fortified encampment by Lake Cumberland, this geographic distance would not present a significant barrier to the public enjoyment of the study area. State and county roads connect all three areas, and they are all fully accessible to the public from existing rights of way. Driving from the current Mill Springs Battlefield Visitor Center in Nancy, Kentucky, the historic Mill Springs Road / State Route 235 connects the core battlefield area to the Beech Grove fortified encampment, a distance of about 9.5 miles or 15 minutes driving time. The distance between the core battlefield area and the Mill Springs crossing fortified ferry landing / mill site is about 25 miles, or 30 minutes driving time, because one needs to drive around part of Lake Cumberland to get to this area south of the lake. Although the driving time between sites on the north and south shores of the lake is somewhat inconvenient for visitors wanting to see all three study area units, the current boundary configuration would not present a major obstacle in managing or providing visitor access to resources within the study area.

The discontinuous nature of the Mill Springs Battlefield study area does present potential management challenges and an increased burden on staff expected to support parkland separated by Lake Cumberland. The 30- to 45-minute driving time between units could result in delays for rangers providing visitor safety or responding to resource protection calls. Maintenance staff would also encounter decreases in worktime when having to account for the round-trip driving time between the current visitor center and core battlefield to other sites and structures located on the south shore of Lake Cumberland.

Overall, the size and boundary configuration of the study area is found to be feasible to manage as a potential new unit of the National Park Service although the discontinuous units represent a potential increase in overall NPS operations and maintenance costs associated with staff time. If the study area were to be added to the national park system, Congress may consider including nationally significant resources described in the 2009 Battle of Mill Springs Historic Areas National Register of Historic Places update nomination.

Landownership, Local Planning and Zoning, and Potential Land Uses

Based on current county assessor data, lands within the Mill Springs Battlefield study area are owned by a combination of nonprofit organizations, government agencies, and private individuals (see figures 3.3 and 3.4). Approximately half of the study area's core battlefield area is owned and protected by the Mill Springs Battlefield Association and Civil War Trust. Zollicoffer Park, a two-acre parcel located within the battlefield unit, is owned by the Pulaski County Fiscal Court.²⁹ The remaining acres in the unit are privately owned. The Civil War Trust and Mill Springs Battlefield Association own about half of the Beech Grove encampment site (approximately 103 and 64 acres, respectively), while the remainder of the unit is in private ownership. The 7.5 acre mill and ferry landing unit is under the jurisdiction of the US Army Corps of Engineers-Nashville District and managed for recreational use as Mill Springs Park. The Brown-Lanier House and the West-Metcalf House are owned and maintained by the Mill Springs Battlefield Association. Privately owned properties within the study area are a mix of single-family residential, forest, pasture, and cultivated agricultural fields.

If Congress were to designate a new park unit that included historic areas and resources identified in this study, there would be no immediate need to change existing landownership, and the National Park Service would not need to carry out any immediate actions that would affect these properties. Ownership and uses of these lands would continue as they were before the park's establishment. Any changes to landownership, management, or use would be in the future, and any land considered for inclusion in a national park unit would only be acquired from willing sellers at fair market value or from willing donors.

Pulaski and Wayne Counties do not currently have zoning regulations or ordinances in place related to the use of lands within or adjacent to the study area. Neither county has land use plans for the rural lands including the study area or the Lake Cumberland shore. Current land use within and around the study area is largely agricultural (cropland and pasture) or forested. Farmsteads dot the countryside, and single-family vacation homes are beginning to line the north shore of Lake Cumberland. Although there may be additional single-family vacation homes constructed along the lakeshore, there are no major developments currently being proposed that would significantly affect current land use patterns within the vicinity of the study area.

The Army Corps of Engineers-Nashville District oversees Lake Cumberland and retains jurisdiction over the lakeshore. The agency has created numerous federal planning documents to guide the management and potential uses associated with Lake Cumberland in the face of increasing private interest in lakeshore development and private dock construction. The Army Corps of Engineers Lake Cumberland Shoreline Management Plan updated in 2012 supports the Corps' goal to "protect and restore the natural environmental conditions of Lake Cumberland while achieving a balance between existing permitted private uses and resources protection for general public use." The plan allocates the shoreline into three zoned areas: prohibited access areas, which are excluded from private development for public safety reasons; public recreation areas, which meet the recreational

²⁹ Civil War Sites Advisory Commission, *Updated to the Civil War Sites Advisory Commission Report on the Nation's Civil War Battlefields-Commonwealth of Kentucky* (US Department of the Interior, Washington, D.C.), 2008.

needs of the general public; and protected shoreline areas, which allow public access and recreational activities as long as they are compatible with protection of the shoreline and related natural resources. Existing private docks are grandfathered into the plan, but any new private moorage facilities must be permitted. Private construction or changes in landforms or vegetation along the shore must first be formally approved by the Corps.

Created in 1991 alongside the Civil War Sites Advisory Commission and officially authorized by Congress in 1996, the American Battlefield Protection Program is an NPS program dedicated to the preservation of battlefields through public-private partnerships. Along with technical expertise, the program offers competitive planning and land acquisition grants. Since 1998, the American Battlefield Protection Program has used Land and Water Conservation Fund (LWCF) monies to award land acquisition grants to 75 battlefields in 16 states. Battlefield land acquisition grants may be used by preservation organizations to purchase battlefield lands or permanent, protective interests in land, such as a conservation easement, for battlefields identified in the Civil War Sites Advisory Commission report. Private nonprofits interested in applying for an American Battlefield Protection Program Battlefield Land Acquisition Grant must partner with a state or local government agency and provide a dollar-for-dollar non-federal match. The Civil War Trust and the Mill Springs Battlefield Association, in partnership with the Wayne and Pulaski County Fiscal Courts, received numerous ABPP grants that allowed the organizations to purchase a total of 15 parcels associated with the battle, 7 of which are located in the study area. Because of the use of LWCF moneys, parcels purchased with an American Battlefield Protection Program Battlefield Land Acquisition Grants are encumbered with Land and Water Conservation Fund Act, section 6(f)(3) requirements that identify use restrictions and mandate perpetual conservation easements, ensuring the long-term preservation of battlefield lands regardless of owner.

Much of the land use around the study area and within the majority of the counties remains primarily agricultural. According to the USDA National Agricultural Statistics Service, in 2007 approximately 53% of Pulaski County (231,781 acres) and 46% of Wayne County (142,827 acres) was categorized as farms.³⁰ Battlefield lands purchased by the Mill Springs Battlefield Association and Civil War Trust using ABPP grants are beholden to perpetual conservation easements that limit future development and land uses that are not sympathetic to their historic context. The Mill Springs Battlefield Association leases a portion of the battlefield lands to local farmers for crops and grazing. Agricultural leases provide the organization a modest income while ensuring that traditional land use can continue within and adjacent to the study area and that the battlefield's agricultural setting and character is preserved.

Commercial and industrial development in Wayne and Pulaski Counties is centered in the established towns of Somerset and Burnside. While there are no county-wide land planning documents for these areas, local community development organizations have focused company recruitment and expansion efforts in Somerset and Burnside where infrastructure to support manufacturing and shipping companies already exists.³¹ The City of Somerset has zoning regulations and a comprehensive plan to guide future development of the city, but the study area is located outside the plan's purview in rural Pulaski and Wayne Counties.

Recreational and tourism development associated with Lake Cumberland is appearing to the east and west of Mill Springs, but as of this study there have been no publicized plans for major marina or resort construction on this portion of Lake Cumberland. The Army Corps of Engineers' current

³⁰ National Agricultural Statistics Service Eastern Mountain regional Field Office (and the Kentucky Field Office, United States Department of Agriculture, https://www.nass.usda.gov/Statistics_by_State/Kentucky/Publications/State_Census_Summaries/Historical_Ag_Statistics/.

³¹ Somerset-Pulaski County Development Foundation, <http://www.spcdf.com>.

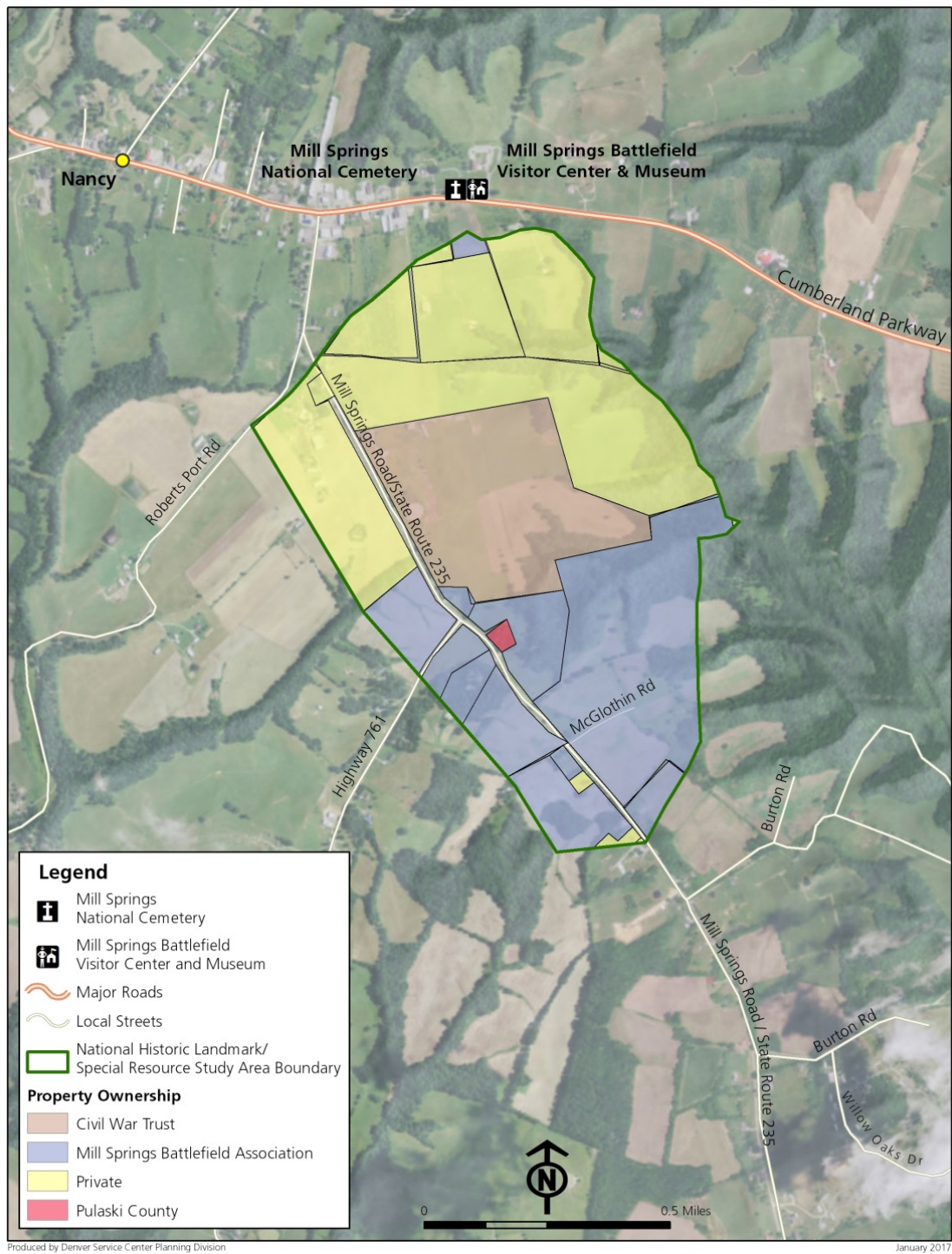


FIGURE 3.3 LANDOWNERSHIPS WITHIN THE STUDY AREA. (PULASKI COUNTY ACCESSOR – 2017).

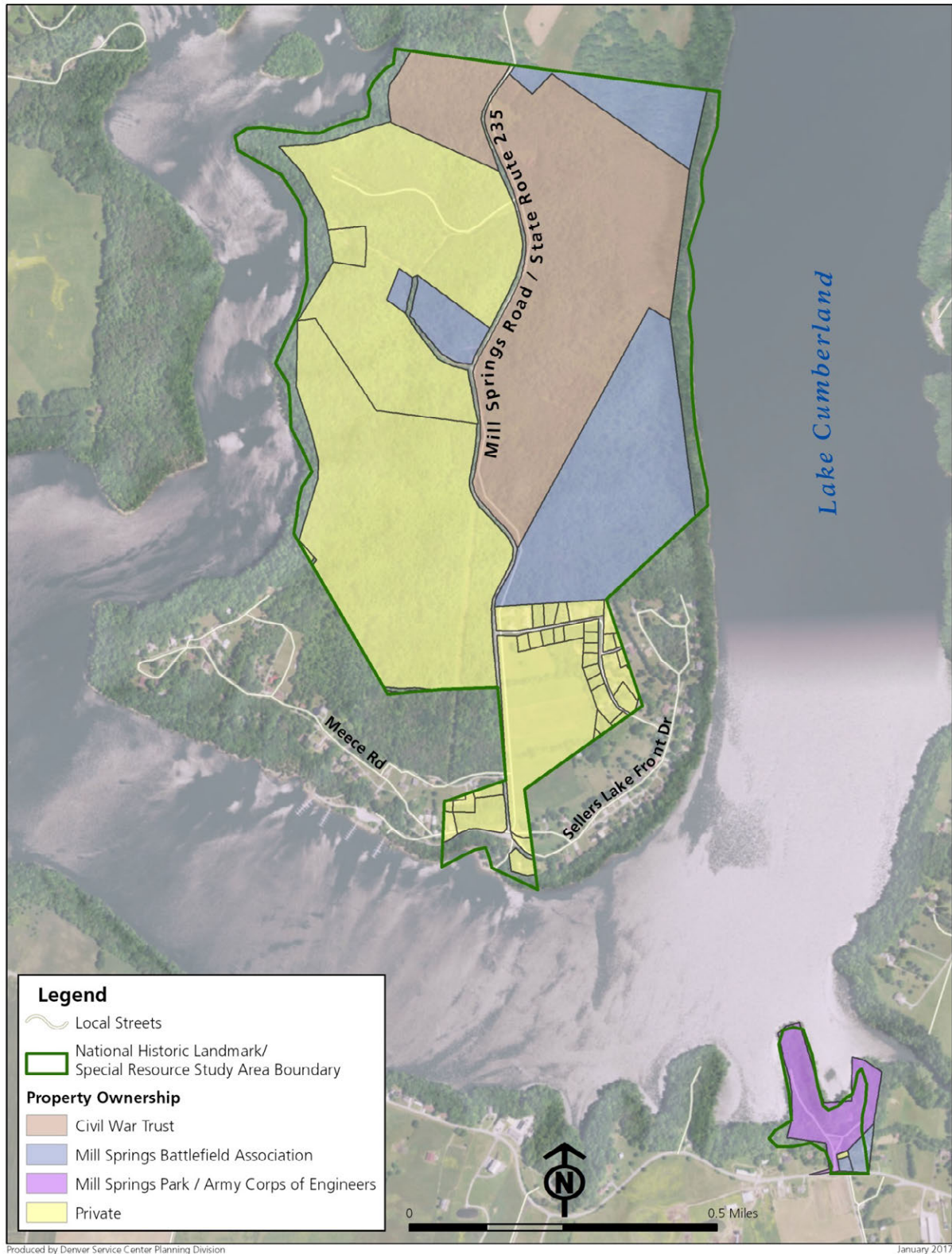


FIGURE 3.4 LANDOWNERSHIPS WITHIN THE STUDY AREA. (WAYNE COUNTY ACCESSOR – 2017).

shoreline management plan limits private uses in favor of conserving natural resources and providing for public enjoyment. Any new Lake Cumberland dock or lakeshore development must be compatible with natural resources, provide for public enjoyment of the lake, and formally approved by the Corps.

Although private landowners may develop their property as they see fit, there is no reason to expect significant changes in Pulaski County and Wayne County landownership or land use patterns in the near future. Current landownership and existing land use patterns would support and complement the proposed designation of a national park unit within the study area. Based on these findings, the study area meets the feasibility criterion based on current landownership, local planning and zoning, and potential lands uses in the area.

Existing and Potential Threats to the Resources

While the Civil War Sites Advisory Commission considered Mill Springs Battlefield as one of the most endangered Civil War battlefields in the 1990s because of a lack of protection and the potential encroachment by Lake Cumberland and associated development, efforts of the Mill Springs Battlefield Association and the Civil War Trust have helped ensure the site's preservation. Over the past 20 years, preservation partners have purchased over 400 acres associated with the Battle of Mill Springs with ABPP Battlefield Land Acquisition Grants and private funding. Land purchased by the Mill Springs Battlefield Association and Civil War Trust using Battlefield Land Acquisition Grant funding from the Land and Water Conservation Fund is encumbered under section 6(f)(3) land use restrictions. While lands purchased through the ABPP Battlefield Land Acquisition Grant program are not federally owned, they are subject to the requirements of the National Historic Preservation Act because the Battlefield Land Acquisition Grant moneys originate from the federal Land and Water Conservation Fund. Regardless of owners, future planning and development must comply with Section 106 of the National Historic Preservation Act as if it were federally owned land. Perpetual conservation easements held by the Kentucky Heritage Council further limit the threat of development and potential loss of resources and allow for continued permitted archeological research. Thanks in part to recent battlefield preservation, the study area's archeological sites and cultural landscape retain a high level of integrity because of limited land use and development following the battle.

Two significant historic structures dating to the Civil War era, the Brown-Lanier House and the West-Metcalf House, are in good condition because of the work of the association and currently face no immediate threats. The Mill Springs Battlefield Association actively maintains the Brown-Lanier House as a historic property and special event rental. The association takes a proactive approach to maintenance to limit potential threats to the house and its surrounding landscape, making sure to monitor the house's condition and limit outside threats with tree trimming, vegetation removal, and repairs/replacements commonly needed in aging structures. To protect the house from encroachment and maintain its rural setting, the association purchased 9 acres of land adjacent to the Brown-Lanier House and Mill Springs Park in 2005.

In 2004, the West-Metcalf House was donated to the Mill Springs Battlefield Association to provide an additional resource related to the Battle of Mill Springs. Constructed circa 1800, the two-room, brick house was in disrepair when the association acquired the building. Using private donations, a local development grant from the state, and assistance from the Wayne County Museum, the association was able to stabilize the building and fully restore it to its original appearance. The restoration effort included reconstructing the porch, replacing failing construction material and

installing hand-crafted replica interior woodwork and joinery.³² This attention to detail earned Mill Springs Battlefield Association the Ida Lee Willis Memorial Foundation Historic Preservation Award, given by the Commonwealth of Kentucky to honor outstanding examples of historic rehabilitation that have furthered the preservation of Kentucky's built environment. It is now open to the public and tells the story of early Wayne County settlement, its time as Zollicoffer's headquarters during the winter of 1861, and its use as a Confederate field hospital after the Battle of Mill Springs. Through these grass-roots preservation efforts the West-Metcalf House was saved from potential loss.

The Army Corps of Engineers - Nashville District manages Lake Cumberland and Mill Springs Park, which includes the study area's ferry landing and mill site. As a federal agency, the Corps is obligated to follow federal resource protection laws and regulations, including the National Environmental Policy Act of 1969, the Clean Water Act, and the National Historic Preservation Act of 1966 (NHPA). Future development and management decisions related to land within Mill Springs Park or adjacent to the lake would be guided by these mandates, ensuring long-term resource protection. Army Corps Engineer Regulation (ER) 1130-2-406 ("Shoreline Management at Civil Works Projects"), ER 1130-2-400 ("Management of Natural Resource and Outdoor Recreation at Civil Works Water Resource Projects"), and ER 1130-2-540 ("Environmental Stewardship Operations and Maintenance Procedures") provide additional agency-level guidance for management and stewardship. Under Army Corps of Engineer guidance, any future management decisions within Mill Springs Park will be designed to minimize potential threats and negative impacts to natural and cultural resources. As part of its dedication to cultural resources, the Corps spearheaded restoration of the 1877 water-powered grist mill in 1976. The historic mill, which is considered a noncontributing historic structure within the Mill Springs ferry landing unit, is maintained in operating condition and regularly run for public demonstrations as part of the Army Corps of Engineers' management of Mill Springs Park.

Limited local planning and zoning regulations for lands within the study area may leave the battlefield and historic resources on privately owned lands vulnerable to incompatible development and encroachment. Future development within or adjacent to the study area may disturb archeological resources and could impact the rural, agricultural setting associated with the battlefield. However, battlefield lands purchased by Mill Springs Battlefield Association and the Civil War Trust using ABPP BLAG moneys are encumbered with perpetual conservation easements that severely limit future development or conflicting land uses. Private landowners within and adjacent to the study area have not shared development plans that would affect these aspects of the study area. Past land use has been limited to agricultural activities and no hazardous materials are known or suspected to be in the study area that would require extensive mediation. Individual, single-family vacation homes may continue to be constructed near the southern boundary of the Beech Grove fortified encampment area, but there are currently no plans for subdivisions, large-scale tourism development, or recreational facilities in or near the study area that would threaten the battlefield's agricultural feeling and setting. Expansion of the existing marina and resort west of Mill Springs could potentially affect viewsheds along the lake and related boat activities may threaten the sense of setting and place near the lakeshore, but no public plans for this type of lake development have been identified. Any lakeshore dock or recreational development would need to be formally approved by the Army Corps of Engineers according to its current Lake Cumberland Lakeshore Management Plan.

³² "The West Metcalfe House restoration is complete," *Wayne County Outlook*, Nov, 4, 2010, http://www.wcoutlook.com/news/local_news/the-west-metcalfe-house-restoration-is-complete/article_d7850303-1cea-51d6-b9d2-7ed4fd3e30fe.html; "Mill Springs honored for restoration of battlefield's West-Metcalfe House," *Kentucky Civil War Bugle*, 5, 3 (July-Sept 2011), <http://www.thekentuckycivilwarbugle.com/2011-3Qpages/millsprings.html>.

Currently, no significant existing or potential threats to the resources within the study area have been identified. Because there are no known or potential threats that would impact the feasibility of a proposed national park unit designation, the study area meets this criterion for feasibility.

Access and Public Enjoyment Potential

Located in rural south-central Kentucky, the Mill Springs battlefield study area is less than 100 miles from Lexington, the second-largest city in Kentucky. Numerous major cities — Louisville (Kentucky), Knoxville (Tennessee), Nashville (Tennessee), and Cincinnati (Ohio) — are within a 3-hour drive of the study area and are serviced by national airports and major highways, making the study area easily accessible for most out-of-town visitors with personal or rented vehicles. The portion of the study area north of Lake Cumberland is located off State Route 80, a main road connecting the communities of Nancy and Somerset to the Cumberland Parkway, a scenic and transportation corridor through central Kentucky, and Interstate 75. The ferry and mill site south of Lake Cumberland are approximately a mile off State Route 90, the major road running along the lake's south shore, connecting the towns of Burnside and Monticello to Somerset, Kentucky. The core battlefield area, Beech Grove fortified encampment, and Mill Springs crossing fortified ferry landing / mill site are all located on paved, county roads and are accessible to the public using existing right of ways. Through the work of the Mill Springs Battlefield Association and the US Army Corps of Engineers, key portions of the study area, including Zollicoffer Park and Mill Springs Park, are open to the public. Existing access in the study area supports public enjoyment and visitor use.

The Mill Springs Battlefield Association, established in 1992 as a nonprofit battlefield preservation group, has actively worked to expand visitor opportunities associated with the Mill Springs Battlefield. The group offers numerous visitor opportunities on the land it owns and manages within the study area. The battlefield association created a self-guided walking tour of the core battlefield area and a 10-stop driving tour through Pulaski and Wayne Counties to connect visitors to historic resources. The group installed 30 interpretive signs throughout Zollicoffer Park and portions of the battlefield owned by the association to share information about the battle, and offers school group programs. The association also organizes four annual events: the battle's anniversary observance in January; Memorial Day celebration in May; a living history weekend in June; and a living history "ghost walk" in October. These special programs reach out to new audiences and have become community events, bringing people to Zollicoffer Park to learn more about the site's history. The association also owns and manages the Brown-Lanier House and West-Metcalf House and offers seasonal tours and special event rentals at the historic homes.

The Mill Springs Visitor Center and Museum, mentioned in chapter 2 as an associated resource located outside the study boundary, provides orientation space for battlefield visitors. The building includes a welcome desk, a community room where visitors can view a 20-minute video summarizing the Battle of Mill Springs, office space for the battlefield association, and a gift shop. The museum portion of the building has three rooms of exhibit space and interpretive panels, an artifact preparation room, and additional curatorial storage space. The visitor center is staffed by Mill Springs Battlefield Association employees and volunteers, and is open year-round Wednesday through Saturday from 10 a.m. to 4 p.m. Individual guided tours of the battlefield and school programs are available by request. The facility has a paved parking lot for 60 vehicles and includes handicap accessible parking stalls and room for two buses.

The visitor center is located on State Route 80 adjacent to Mill Springs National Cemetery, approximately one mile north of Zollicoffer Park and the core battlefield. The building was purposefully constructed outside the NHL boundary so as to not disturb the battlefield's

archeological resources and cultural landscape. However, this means the building is not included in the legislated study area for this special resource study.

The Army Corps of Engineers operates Mill Springs Park as a day-use recreational area. The area includes a variety of visitor facilities, including paved walkways, group and individual picnic sites, a scenic lake overlook, and a boat launch. Group picnic shelter reservations are available April through October. The Army Corps of Engineers partners with local volunteer groups to operate the grist mill and offer guided tours of the structure and water-powered milling demonstrations seasonally. If the study area were to be designated as a unit of the national park system, the National Park Service could build on many of the association's and Corps' existing programming and expand interpretive materials related to the unique historic and archeological resources at the site. The study area encompasses numerous historic resources that can help the public understand the importance of Kentucky's geographic location during the Civil War and the Commonwealth of Kentucky's struggle to maintain neutrality as a border state. Visitors can learn about life in a Confederate encampment and the basics of historic archeology by examining the remaining Confederate earthworks and archeological resources at Beech Grove and the Mill Springs ferry site. The battlefield resources can help visitors better understand the actions and outcomes of the 1862 Union Offensive in Eastern Kentucky and connect the Battle of Mill Springs to following battles and campaigns that dictated the course of the American Civil War.

Additional interpretive themes and programming could focus on the lasting effects of the Battle of Mill Springs and the Civil War on the region. As stated in the *NPS Civil War to Civil Rights Commemoration Summary Report* (NPS 2016), the National Park Service has dedicated itself to going beyond battlefields to better interpreting the causes and consequences of the war through the stories of African Americans, civilians, and women in the context of the Civil War. Slavery was a crucial part of the state's economy during the 18th and 19th centuries and was written into the state's 1792 constitution. Kentucky was one of three states that refused to ratify the 13th Amendment in 1865. Future interpretation could focus more heavily on the causes of the Civil War and slavery in Kentucky. While the state's pro-Union governor officially pledged neutrality during the war, the Union and Confederate armies found supporters throughout Kentucky and recruited heavily there, facts that offer an opportunity for future interpretation to discuss the political climate in the Border States leading up to the war and the conflicting ideologies held by many of the state's residents. The Brown-Lanier and West-Metcalf houses offer opportunities to examine antebellum life in central Kentucky and the stories of citizens who had the war appear on their doorsteps. Zollicoffer Park, bearing the name of a fallen Confederate general, its Confederate memorials, and the story of the Zollie Tree offer interesting opportunities for visitors to learn about early 20th-century commemoration of the Civil War and its complicated legacy in Kentucky. Together, the study area's resources support the NPS Civil War to Civil Rights initiative and broaden the type of stories currently told at the site.

If Mill Springs Battlefield became a national park unit, the National Park Service could tap into existing regional heritage tourism efforts related to Kentucky and Tennessee during the Civil War, such as the Central Kentucky Civil War Heritage Trail and the Tennessee Civil War National Heritage Area. Being a unit of the national park system could strengthen the connections between Mill Springs Battlefield and other NPS-managed sites in the vicinity: Big South Fork National River and Recreation Area (62 miles); Abraham Lincoln Birthplace National Historical Park (79 miles); Mammoth Cave National Park (95 miles); Cumberland Gap National Historical Park (100 miles); Stones River National Battlefield (164 miles); and Fort Donelson National Battlefield (200 miles). Together these parks interpret numerous Civil War themes including "The Causes and Coming of the Civil War," "The Hallowed Ground of Epic Battles," and "The War beyond the Major

Battlefields.”³³ The Battle of Mill Springs and the study area’s resources support the national stories being told at existing park units. As the nexus between western Virginia, Kentucky, and Tennessee and a natural bottleneck through the Appalachian Mountains, the Cumberland Gap became central in Civil War military strategies, leading Union and Confederate armies to move forces into eastern Kentucky and Tennessee. Cumberland Gap National Historical Park highlights the area’s importance during the Civil War. The Battle of Mill Springs was one of the larger formal engagements in the area during the Union Offensive in Eastern Kentucky early in the war. Big South Fork National River and Recreation Area includes cultural resources connected to the guerilla warfare and small skirmishes that were common along the Cumberland River as both sides battled to take control of the Border States after the Battle of Mill Springs caused the Confederate defensive line to collapse in 1862. The Union victory at Mill Springs boosted morale, weakened the Confederate defenses, and helped precipitate the capture of Fort Henry, Fort Heiman, and Fort Donelson—events that are interpreted at the Fort Donelson National Battlefield.

In summary, the Mill Springs Battlefield study area has sufficient access for administration of a potential park unit and there is proven potential for public enjoyment of the study area’s resources. The study area meets this criterion for feasibility.

Public Support and Socioeconomic Impacts of Designation

Public outreach activities took place early in the special resource study to collect additional information resources, inform the public about the special resource study process, and gauge public support. A project newsletter announcing the study was mailed to landowners within and adjacent to the study area in November 2015. Interested individuals were directed to attend informational meetings or visit the project’s NPS PEPC website for more information. Local informational meetings were held at the Mill Springs Battlefield Visitor Center and Museum (Nancy, Kentucky) on January 4, 2016, and at the ASPIRE Center (Monticello, Kentucky) on January 5, 2016. These meetings allowed the NPS study team to share information about the study and gather the public’s ideas through direct interaction between the public and NPS personnel.

During this initial period of public outreach, five questions were posted to the project website and on posters displayed during the informational meetings to guide discussions about the study area’s suitability for inclusion in the national park system and potential management alternatives:

1. What makes Mill Springs Battlefield unique among other Civil War sites and battlefields?
2. Do you have any ideas or concerns about preserving and interpreting the Mill Springs Battlefield? What are they?
3. What lands or resources should or should not be included in the study area? Why?
4. What are your thoughts about possible management options for the Mill Springs Battlefield?
5. Do you have any other ideas or comments you would like to share with us?

Approximately 130 individuals attended the outreach meetings. A total of 22 unique comments were received via the PEPC website between December 17 and February 15, 2016. Based on the comments

³³ National Park Service, “Civil War in the Southeast,” unigrid pamphlet; National Park Service, “The Civil War,” <https://www.nps.gov/civilwar/index.htm>.

received in person at the informational meetings and electronically, there appears to be public support for designating Mill Springs Battlefield as a new unit of the national park system.

The majority of those comments submitted by the public commended the Mill Springs Battlefield Association for its successful preservation work and program offerings but expressed some concern over the potential threat of future development on the historically rural battlefield. Many had personal connections to the battlefield and its Civil War resources and wanted to share the stories of the Battle of Mill Springs with a larger, national audience. Those interested in the long-term preservation of the battlefield and expansion of visitor experiences saw the National Park Service as an appropriate agency to work with local groups to make this a reality.

Commenters also expressed a strong interest in connecting the site to the region's rich Civil War history. They directed the study team to consider the resources identified in the updated 2009 National Register of Historic Places nomination (such as the West-Metcalf House and farmland adjacent to the mill) as well as other regional historic sites and existing NPS units in telling the story of the Battle of Mill Springs and the Civil War in Kentucky.

Organizations that expressed support for the potential national park unit designation include the Lewis & Clark Trust, the Lake Cumberland Tourism/Somerset-Pulaski County Convention and Visitors Bureau, and the National Parks Conservation Association.

A few individuals felt that the Mill Springs Battlefield Association and US Army Corps of Engineers were successfully preserving and interpreting the study area's resources, and another government agency was not needed to manage the battlefield and mill. One respondent expressed opposition to the designation based on concerns about how NPS ownership and management would affect current farming practices and the potential for future federal land acquisition outside the study area.

Many members of the public believe that the establishment of a proposed national park unit in the area would benefit the local economy. Tourism continues to be a growing industry in Kentucky. The Southern Shorelines Tourism Region, which includes Lake Cumberland and associated lakeshore recreational areas, draws millions of people to both Pulaski and Wayne Counties each year. In 2015, direct expenditures by tourists accounted for over \$79.7 million in Pulaski County and \$21.5 million in Wayne County. Travel industry employment is estimated to account for 2,043 jobs in Pulaski County and 765 jobs in Wayne County.³⁴ The proposed designation of a national park unit could be expected to bring additional visitors to the area, which may complement tourism related economic activities already occurring within the region. While the possible economic impact of a new national park unit varies greatly related to the park's location, size, associated development, visitation numbers, and visitor opportunities, the proposed designation of the study area as a national park unit would likely support local economic activity and provide additional support to existing heritage tourism efforts.

Agriculture continues to be a considerable economic force and major land use in Pulaski and Wayne Counties. Most of the study area is maintained as farmland, either as pasture or cropland. Parcels acquired by the Mill Springs Battlefield Association and the Civil War Trust through ABPP battlefield land acquisition grants are encumbered with section 6(f)(3) land use restrictions and perpetual conservation easements, which would support the land's continued agricultural use. Agricultural leases currently issued by MBSA to local farmers provide a modest amount of income to the association and farmers while ensuring the land maintains the rural, agricultural characteristics that

³⁴ CERTEC, Inc., "Economic Impact of Kentucky's Travel and Tourism Industry – 2014 and 2015," <http://www.kentuckytourism.com/userfiles/Industry/research/economic-impact-15/2015%20Economic%20Impact%20of%20Kentuckys%20Travel%20and%20Tourism%20Industry.pdf>.

support the battlefield's cultural landscape. If the study area were to be designated as a national park unit, battlefield management would likely continue to rely on agricultural use to provide context, preserve the rural landscape, and preserve a historic setting for battlefield resources. Agricultural leases and special use permits for grazing and hay production are tools used by designated National Park Service battlefield parks that ensure traditional land use patterns continue to reflect their rural character and support local agricultural practices.

Based on broad public support expressed during the public scoping period of the special resource study process and that the proposed designation of a new national park unit would likely support and complement current socioeconomic activities within the region, the Mill Springs Battlefield study area meets this feasibility criterion.

Cost and Budgetary Feasibility

Since the National Park Service has a legislated mandate to conserve resources unimpaired for public enjoyment, it could be assumed that the park units it manages would continue indefinitely into the future. However, designation of a new unit of national park system does not automatically guarantee that funding or staffing to administer that new unit would be appropriated by Congress. Any newly designated national park unit would have to compete with the more than 400 existing park units for limited funding and resources within a current fiscally constrained environment. Study areas that may be nationally significant, suitable, and technically feasible for designation as a new park unit may not be feasible in light of current budget constraints, competing needs across the entire agency, and the existing National Park Service deferred maintenance backlog.

Acquisition Cost. As outlined in the landownership section presented above, the 647.5-acre study area is currently owned by a mixture of private individuals, nonprofit preservation organizations (Mill Springs Battlefield Association and the Civil War Trust), and county as well as government entities. Potential acquisition cost for properties within the study area would vary greatly depending on the location, level of existing development, and property size. If Congress were to designate the Mill Springs Battlefield study area as a new national park unit, the National Park Service would first develop a land protection plan, and actual acquisition costs would be determined by formal real estate appraisals at the time of acquisition. Any future land acquisitions would also have to take into account larger agency-wide and regional priorities for purchasing new park lands. The establishment of a new national park unit by Congress does not guarantee funding or the purchase of lands within the study area, and any improvements would require further cost analysis and planning. Any National Park Service acquisition of private properties can occur only through donation or from a willing seller for the appraised fair market value.

Special consideration would have to be given when acquiring properties previously purchased using NPS ABPP land acquisition grant funding, which are encumbered by conservation easements and/or limited by other programmatic preservation requirements. If the National Park Service subsequently acquires the fee interest in these properties, the ABPP grant recipients should be aware that acquisitions under consideration will be reduced to avoid any prohibited duplication of payments. Further, any conservation easements encumbering these properties will need to be evaluated on a case by case basis for compliance with Department of Justice regulations.

Through the use of ABPP battlefield land acquisition grant funds, the Mill Springs Battlefield Association and Civil War Trust have purchased properties that fall within the study area. Lands purchased through this grant program are also encumbered by the Land and Water Conservation Fund Section 6(f)(3) non-conversion clause requiring their use for public outdoor recreation and

have conservation easements held by the Kentucky Heritage Council. Seven properties located within the study area were purchased through this federal program using matching funds (table 3.1).

TABLE 3.1 STUDY AREA PARCELS PURCHASED WITH ABPP BATTLEFIELD LAND ACQUISITION GRANTS.

County	Parcel #	Acreage
Pulaski	030-0-0-59	112.76 acres
Pulaski	030-0-0-60	117 acres
Pulaski	030-0-0-61	16.39 acres
Pulaski	030-0-0-67	92.86 acres
Pulaski	022-0-0-86*	1 acre total
Wayne	076-00-00-10	58 acres
Wayne	076-00-00-007	102 acres
Wayne	076-00-00-006.00	77.7 acres

*A portion of this parcel falls within the study area.

If the Mill Springs Battlefield study area were to be designated a new national park unit, the 7.5 acres of the Mill Springs Park that are federally owned by the Army Corps of Engineers would likely require an agency land transfer or a formal cooperating agency agreement to outline jurisdictional roles and responsibilities for this property. Using available data from the Pulaski and Wayne County Assessor's office on property values in 2016 and on comparable costs of lands purchased using battlefield land acquisition grant funds, an estimated average cost of \$4,000-\$5,000 per acre for non-developed farmland was identified. Assuming the other 640 acres of the study area that are not federally owned would eventually be purchased at fair market value instead of being donated, the acquisition cost could range between \$2,560,000 and \$3,200,000. Future acquisition costs could vary significantly depending on fair-market value and regional trends within the real estate market and are difficult to predict with accuracy. As stated earlier, if Congress were to designate the Mill Springs Battlefield study area as a new national park unit, the National Park Service would need to determine actual real property acquisition costs through formal real estate appraisals at the time of purchase.

One-time Facility Cost. As part of the special resource study process, National Park Service staff from the Southeast Regional Office Facility Support Division conducted a site visit/reconnaissance of the Mill Springs Battlefield study area in September, 2016. With support from the Mill Springs Battlefield Association, information related to the current condition of visitor facilities and associated assets was collected and a windshield survey of assets within the study area was conducted. In evaluating the study area, NPS staff only had access to lands currently owned by the Mill Springs Battlefield Association, Civil War Trust, and the Army Corps of Engineers, so this assessment is limited to those properties. Based on available information collected during this site visit as well as additional data provided by the association, NPS staff was able to develop gross cost estimates to evaluate what potential one-time facilities costs may look like if the study area were to be designated as a new national park unit (table 3.2). Gross cost estimates are presented in Fiscal Year 2016 dollar amounts and include base construction, federal management, contingency, and design and compliance costs. Itemized construction cost estimates for the following facilities that were used in this analysis are included in appendix D. If the Mill Springs Battlefield study area were to be designated a new unit of the National Park Service, there would likely be additional capital improvement and new construction costs not captured in the study.

TABLE 3.2 ONE-TIME IMPROVEMENT COST ESTIMATES – MILL SPRINGS BATTLEFIELD STUDY AREA.

Infrastructure / Asset	One-Time Improvement Cost
Mill Springs Visitor Center and Museum	\$2,512,000
Zollicoffer Park and Beech Grove	\$84,000
Mill Springs Park*	\$141,000
Mill Springs Mill*	\$1,067,000
Brown-Lanier House	\$992,000
West-Metcalf House	\$117,000
Noncontributing building rehabilitation	\$807,000
Noncontributing building demolition	\$363,000
TOTAL CONSTRUCTION COST	\$6,083,000

* The Army Corps of Engineers owns and actively manages these areas and the Corps is conducting infrastructural improvements related to these assets.

The Mill Springs Visitor Center and Museum, constructed in 2006, was deemed to be in fair condition. One-time facilities costs would primarily focus on bringing the building's fire and HVAC systems up to code, meeting legally mandated Architectural Barriers Act accessibility standards for federal facilities, upgrading the existing museum collection facilities, and reconfiguring the interior space to meet National Park Service needs. Total preliminary construction cost for the visitor center and museum are estimated at \$2,512,000.

One-time facility improvement cost estimates for the battlefield landscape focus on core battlefield area at Zollicoffer Park as well as key areas at the Beech Grove fortified encampment. At Zollicoffer Park, improvement costs would include: gazebo and bridge repairs, trail delineation, and restoration of the stone Confederate Monument and surrounding stonewall. The chimney of Zollicoffer's 1861 winter headquarters, located in the Beech Grove fortified encampment area, would need to be stabilized. These one-time facility improvement costs are estimated at \$84,000.

Mill Springs Park is owned by the Army Corps of Engineers and maintained in good condition as a public recreational site. Many of the one-time costs associated with the park relate to the replacing visitor facilities and infrastructure that is nearing the end of its lifecycle. Improvements include: replacing/repairing the boat dock; gazebo repairs; grill and picnic table replacement; bridge and split rail fence repairs; trail delineation; and cannon preservation. Total one-time facility improvement costs for Mill Springs Park are estimated at \$141,000.

The historic mill building is currently owned by the Army Corps of Engineers and maintained in operating condition for public tours. Major costs associated with the mill are: renewing interior and

exterior finishes as part of cyclical maintenance; updating the electrical and fire protection systems; stabilization of the site and the mill foundation; and addressing small leaks through waterworks and piping repairs. Total one-time facility improvements for Mill Springs Mill are estimated at \$1,067,000.

At the time of this study, the Army Corps of Engineers proposed numerous infrastructural improvements at Mill Springs Park. The Corps has initiated National Historic Preservation Act, Section 106 consultation with the National Park Service as well as other state agencies as part of the planning process. Proposed infrastructural improvements in the park include the replacement of the mill's wood shake roof, replacement and upgrade of water and electrical lines, and stabilization of key picnic areas. Once completed, these improvements will address some of the projects identified during the September, 2016 NPS site visit and included in the NPS one-time costs estimates. Continued Army Corps of Engineers management may also address cyclical costs included in the preliminary estimate, lowering the estimated one-time facility cost associated with NPS ownership or management as a national park unit.

The Army Corps of Engineers-provided cost estimates for rehabilitation and repair of the locations within Mill Springs Park and specifically critical system components of the mill, picnic area, restroom, and docks. The trails, picnic shelter, utilities, and other features costs were not calculated. Should Mill Springs Park become part of a unit of the National Park Service, the National Park Service would need to determine and negotiate the total deferred maintenance repair cost with the Army Corps of Engineers prior to the real property ownership transfer.

The Brown-Lanier House, located adjacent to Mill Springs Park, is currently used by the battlefield association for special event rentals. The building would need minor foundation and roof repairs, upgraded plumbing, electrical, and fire protection systems, and interior finish work, as well as improvement to meet legally mandated Architectural Barriers Act accessibility standards. Additional improvements to the grounds include fence repair, paving the drive and parking lot, and additional landscaping according to treatment recommendations from a cultural landscape report. Preliminary one-time facility costs associated with the Brown-Lanier House are estimated at roughly \$992,000.

The West-Metcalf House is in good condition because of the Mill Springs Battlefield Association's work on a complete restoration of the property in the 2000s. The building would need Architectural Barriers Act accessibility standards upgrades and minor interior and electrical work. Preliminary one-time facility costs are estimated at \$117,000.

Four noncontributing buildings within the study area were identified for potential rehabilitation and could be used in the future if the study area were to be designated as a national park unit and fall under direct National Park Service management. These include three tobacco barns and a metal pole barn. The tobacco barns are currently used by local farmers through agricultural leases. The wood tobacco barns are in relatively poor condition, but may be locally or regionally historically significant under National Register of Historic Places guidelines. They would require roof replacements, exterior paint, interior stabilization, and access road improvements. A metal, double-door barn was also identified as a potential storage/maintenance facility. The metal pole barn would require interior improvements, replacement doors, and upgrades to meet legal requirements under Architectural Barriers Act accessibility standards. In total, preliminary rehabilitation costs related to these four identified noncontributing buildings are roughly estimated at \$807,000.

During the September 2016 site visit, four other noncontributing buildings were initially identified for potential demolition: a small, 20th-century house; a double-door garage located near the Mill Springs Visitor Center; and a silo and pole barn. These buildings are in poor condition and do not

appear to contribute to the historic context, setting, visitor experience, or potential site operations of the battlefield. Preliminary demolition and site mitigation costs for the four identified noncontributing buildings are estimated at \$363,000.

Additional one-time costs related to the Mill Springs Battlefield study area and potential National Park Service management could include cultural resource baseline historic structure and landscape documentation that would inform future cultural resource management (e.g., National Register of Historic Places determinations of eligibility, cultural landscape reports, or historic structure reports). Updated interpretive materials, modernized museum exhibits, and a revised battlefield orientation video could also be developed if the National Park Service assumed management of the study area.

Operational Cost. National park unit operating costs vary widely, depending on their overall size, the types and quantities of resources they manage, the number of visitors, the level of programs offered, safety and security issues, staffing, and many other factors. At a minimum, the operating cost of a proposed new park unit at Mill Springs Battlefield would need to include grounds and facilities maintenance, utilities, communications, administration, and other miscellaneous expenses. Operating costs would also include staffing. Personnel would be required to design and deliver interpretive programming (e.g., personal interpretation, exhibits, special events), maintain facilities and grounds, perform administrative functions (budget, management, planning, and compliance), manage and monitor battlefield resources, provide for law enforcement (if necessary), and conduct outreach to the community and schools.

To estimate the potential costs of operating Mill Springs Battlefield as a new unit of the National Park Service, the operational costs from existing national park units such as Pea Ridge National Military Park, Stones River National Battlefield, and Fort Donelson National Battlefield were used as a baseline for comparison (table 3.3). These units which were chosen due to their similarities to the Mill Springs Battlefield study area in terms of resources protected, park setting, and acreage, have annual operating budgets ranging from \$1,298,000 to \$1,493,000.³⁵ These operating costs include staffing (including part-time and seasonal employees), as well as programming, maintenance, and administrative costs. As a result of agency-wide priorities, it would likely take several years for the National Park Service to fully staff and operate any newly designated national park unit.

Overall costs and budgetary considerations associated with the acquisition, one-time facility development and rehabilitation, and operations of the Mill Springs Battlefield study area are projected to be substantial. Acquisition costs for the 640 acres within the study area that are privately owned are estimated to be approximately \$3,200,000. One-time facilities improvements and restoration costs of the existing visitor facilities, historic structures, cultural landscape, and noncontributing buildings within the study area are estimated to be \$6,083,000. Using comparable national park unit operation budgets, annual operating and staffing costs for a proposed Mill Springs Battlefield national park unit may range from \$1,200,000 to \$1,500,000.

National Park Service Maintenance Backlog and Fiscal Constraints. According to the NPS Parks Facility Management Division, the National Park Service's total deferred maintenance for the entire agency was calculated to be \$11.331 billion at the end of fiscal year 2016.³⁶ This cost represents the backlog associated with road maintenance, park visitor centers, water systems, buildings, campgrounds, trails, housing, waste water systems, dams, and utility systems. Aging infrastructure, buildings, and visitor facilities, many of which were constructed during the mid-20th-century NPS

³⁵ These numbers reflect the final 2016 budget for comparable parks included in the NPS Budget Justifications for FY 2018.

³⁶ National Park Service, "NPS Deferred Maintenance Reports," accessed June 2017, <https://www.nps.gov/subjects/plandesignconstruct/defermain.htm>.

TABLE 3.3 ANNUAL OPERATIONAL COSTS – 2016.

Park Unit	Operating Budget (FY 16)	Full-time Equivalent Employees
Stones River National Battlefield*	\$1,298,000	10
Pea Ridge National Battlefield	\$1,333,000	16
Abraham Lincoln Birthplace National Historical Park	\$1,351,000	17
Fort Donelson National Battlefield*	\$1,493,000	15

* Annual operating budgets for Stones River National Battlefield and Fort Donelson National Battlefield include care of the associated national cemeteries included within the parks' legislated boundaries.

Mission 66 initiative, continue to deteriorate, and needed repairs are often postponed because of the lack of current funding or staffing levels. If appropriations and other sources of federal funding for addressing deferred maintenance needs were increased, it would still be difficult to find the staff capacity to complete routine maintenance repairs before they become serious issues and major structural or infrastructural replacement projects.

Adding the Mill Springs Battlefield Visitor Center, historic structures, trails, and parking lots, found within the Mill Springs Battlefield study area would contribute to the significant maintenance burden currently being felt across the entire agency and may, without routine maintenance, eventually contribute to the overall NPS deferred maintenance backlog. Historic structures such as the Brown-Lanier House, Mill Springs Mill, West-Metcalf House, and noncontributing structures found in the core battlefield area, would require regular maintenance and repairs as well as ABA accessibility updates to better meet federal standards and visitor experiences.

Comparable NPS battlefield parks have annual operating budgets ranging from \$1.2 million to \$1.5 million and support 10-17 full-time equivalent staff-members. In the NPS 2018 Budget Justification, the five new units of the National Park Service established in 2017 received a basic funding level of \$180,000 and 1 full-time equivalent staff to support initial operations.³⁷ It would be difficult to manage day-to-day operations and maintenance of the Mill Springs Battlefield with this level of funding and staff, let alone increase interpretation or visitor opportunities or manage resources to National Park Service standards. As a result of budget constraints and agency-wide priorities, it would likely take several years before the National Park Service could adequately staff and operate any newly designated national park unit.

The costs and budgetary feasibility associated with the management and operation of Mill Springs Battlefield represent a significant financial investment and long-term budgetary appropriations to an agency that is actively looking at ways to reduce its current deferred maintenance backlog, park budgets, and staffing. Considering the fiscal realities under which the National Park Service is currently operating, the special resource study finds that, because of costs and budgetary challenges, it is not feasible to consider adding Mill Springs Battlefield as a new unit of the national park system.

Study Finding on Criterion 3 - Feasibility

The Mill Springs Battlefield study area meets several components of the special resource study feasibility criterion. An area of this size and configuration would be feasible to administer as a new

³⁷ Department of Interior, *Budget Justifications FY2018*, Overview-26.

unit, although traversing Lake Cumberland would add additional staff time and operation costs associated with park management of the three discontinuous units of the study area. No changes to landownership, zoning, or adjacent land uses that would affect the feasibility of administering the area as a new unit are likely to occur. No known or potential threats are foreseen to the units. All of the study area units have vehicle access, and the study area has high potential for public enjoyment and interpretation. There is public support for designation of the area as a national park unit and the designation would likely result in beneficial economic impacts to the region.

Evaluated under criterion 3, costs and budgetary feasibility associated with the potential acquisition, one-time facility development and rehabilitation, and long-term operations of the study area are projected to be a substantial commitment. Given the current deferred maintenance backlog and budgetary challenges facing the National Park Service, these costs are a significant barrier to the potential designation of a new national park unit at the Mill Springs Battlefield. Because of projected costs associated with management and operations and NPS budgetary constraints, this special resource study concludes that the Criterion 3 - Feasibility is not met.

EVALUATION OF THE NEED FOR DIRECT NATIONAL PARK SERVICE MANAGEMENT

The fourth criterion in the special resource study evaluation process addresses whether the study area requires direct management by the National Park Service instead of protection by another public agency or the private sector. National Park Service *Management Policies 2006* (§1.3.4) further requires direct National Park Service management not only to be needed but that its management be “the clearly superior alternative.” Inclusion in the national park system would provide a study area with the stewardship mandate defined in the National Park Service Organic Act,

“...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations,”

There may be a need for direct National Park Service management if current or potential management entities cannot provide opportunities for resource stewardship or public enjoyment. Unless direct National Park Service management is identified as the clearly superior alternative, the National Park Service recommends other existing organizations or agencies continue resource management responsibilities, and the study area is not recommended for inclusion as a new unit of the national park system.

Although the National Park Service has a mandate to conserve resources and provide for public enjoyment and it can be assumed that areas it manages continues indefinitely into the future, designation of an area as a national park unit does not automatically ensure adequate staff and funding to administer a site—any new authorizations need to compete with other existing park units for funding in a fiscally constrained environment. Articulated in Criterion 3 - Feasibility, costs and budgetary constraints are a significant barrier and would prevent the National Park Service from effectively managing resource within the study area.

Current Management Within the Study Area

The core battlefield and Beech Grove fortified encampment sites are primarily owned and managed by the Mill Springs Battlefield Association. Since its creation in 1992, the association has acted as the lead management entity to ensure the battlefield’s protection and interpretation. By raising interest in the battle, purchasing threatened battlefield lands, and engaging the public in the stewardship and maintenance of the site, the Mill Springs Battlefield Association has improved the condition of what

was once considered one of the most endangered battlefields in the country. The battlefield association transformed Zollicoffer Park from a small county park into the access point for the larger battlefield and commemorative event site. Archeological surveys and the updated national register documentation funded by the battlefield association have increased academic and public understanding of the battle and informed continued preservation efforts.

Over the years the Mill Springs Battlefield Association has worked closely with federal and state programs, such as the National Park Service American Battlefield Protection Program, that provide recreational opportunities and work to safeguard natural and cultural resources associated with battlefield lands. As of 2016, a total of 15 properties associated with the battle have been acquired using ABPP Battlefield Land Acquisition Grant funding, 7 of which are located inside the study area boundary. Roughly 246 acres in Pulaski County and 237 acres in Wayne County have been protected through the Battlefield Land Acquisition Grant program, funded by the Land and Water Conservation Fund. The fund, established in 1964, invests oil and gas lease earnings into federal and state programs that provide recreational opportunities and work to safeguard natural and cultural resource, such as the American Battlefield Protection Program. Study area lands purchased with the American Battlefield Protection Program grants are encumbered with Land and Water Conservation Fund Act - Section 6(f)(3) land use restrictions that state “no property acquired or developed with assistance under this section shall, without the approval of the Secretary [of Interior], be converted to other than public outdoor recreation uses.” To ensure landowners are adhering to the stipulations of Section 6(f)(3), the Kentucky Heritage Council holds perpetual conservation easements on Mill Springs Battlefield lands purchased through this program.

The battlefield association continues to explore land acquisition and preservation efforts when other properties associated with the battle become available. Recent efforts to restore the West-Metcalf house illustrate the effectiveness and success of the association in leading detailed preservation efforts and applying its fundraising expertise and management skills to the protection of battlefield resources in the area.

The Mill Springs Battlefield Association actively works to improve understanding and knowledge about the Battle of Mill Springs and the battlefield’s historic resources through continued engagement with the archeology community, Civil War scholars, and NPS programs. Shortly after its creation, the nonprofit took the lead on documenting the battlefield and sharing the battle’s importance within the national context of the Civil War. Association-supported archeological surveys throughout the 1990s and 2000s resulted in the identification of the correct location of Federal artillery at Moulden’s Hill and Timmy’s Branch, the site of the first shots fired in the battle. A 2005 American Battlefield Preservation Program grant awarded to the association funded updated national register documentation that expanded the historic district boundary and discussed the importance of archeological resources at Beech Grove and Timmy’s Branch. In 2015, the American Battlefield Protection Program awarded the association additional preservation grant funding to use light detection and radar surveying, archival research, and artifact analysis to locate resources on the southern portion of the battlefield. Resulting information can be used to identify and prioritize properties for future preservation efforts. The association produced a *NPS Teaching with Historic Places* lesson title “The Battle of Mill Springs: The Civil War Divides a Border State.” The materials help 5th through 12th grade students consider the complexities of life in Kentucky leading up to and during the Civil War as well as learn about the battle through classroom activities, maps, and primary sources.³⁸ This initiative allowed Mill Springs Battlefield Association to partner with the NPS Cultural Resource Training Initiative and Parks as Classrooms programs.

³⁸ Mill Springs Battlefield Visitor Center and Museum, “The Battle of Mill Springs: The Civil War Divides a Border State,” <http://www.millsprings.net/images/PDF/ActivityBook.pdf>.

The Mill Springs Battlefield Association also has taken many actions to ensure visitors have a high quality experience. By successfully securing donations and grants from numerous local, state, and national funding sources, the association provides public access and interpretive programming of the battlefield. Federal appropriations funded the construction of the 10,000 square foot visitor center and museum, which has served as the visitor contact station, community meeting room, exhibit space, and museum collection facility since its opening in 2006. The visitor center orientation video was produced with help from the Kentucky Tourism Board. The association has also led efforts to provide interpretation of the battlefield, creating the walking trail and driving tour, installing historically sensitive fencing and 30 interpretive waysides, and organizing annual events at the battlefield. Future interpretation will be guided by the association-funded Interpretive Plan for Mill Springs Battlefield, completed in 2010.

The battlefield association is primarily funded through special event ticket sales, visitor center gift shop sales, grants, leasing houses and farm land owned by the association, and the Kentucky coal severance fund.³⁹ Coal severance tax revenue is calculated on an annual basis according to the gross value of coal mined and processed within an individual county. This money is then distributed by county fiscal courts to numerous programs dedicated to economic and community development as well as educational / social goals.⁴⁰ Throughout the 2000s, Kentucky coal severance funds have been a crucial part of the Mill Springs Battlefield Association's annual operating budget, paying in part for the association's staff members, visitor center and battlefield operations, and land acquisitions. In recent years, coal production in Pulaski County has significantly decreased, resulting in less coal severance tax revenue and concerns about funding the long-term management of the battlefield. Despite these fiscal challenges, the association has a proven track record of success and continues to be the leading advocate for the stewardship of the Mill Springs Battlefield and its legacy. The association has a well-defined internal organizational structure, diverse funding sources, and garners external recognition and support from organizations like the Civil War Trust.

The majority of Mill Springs crossing fortified ferry landing / mill site is currently owned managed by the Army Corps of Engineers - Nashville District as part of its duties related to Lake Cumberland reservoir. As a federal agency, the Army Corps must care for the historic resources found on its lands per the National Historic Preservation Act of 1966, as amendment, one of the pieces of cultural resource legislation used to guide NPS programs. The Army Corps of Engineers spearheaded restoration efforts at the mill during the 1970s and continues to maintain the historic structure and surrounding landscape for public enjoyment. Mill Springs Park, which includes the Mill Springs crossing fortified ferry landing / mill site, is currently operated as a recreational area and provides visitor access and interpretation. While interpretation at the park is primarily focused on the historic mill, the Army Corps provides resource protection to the archeological sites within the study area and can offer expertise as a federal management agency.

The Army Corps of Engineers is undertaking infrastructural improvements at Mill Springs Park in response to the immediate needs to preserve the historic mill and maintain adjacent visitor amenities at the park. The project includes installation of a new roof on the mill structure, new water and electrical lines into the visitor restroom, and stabilization of picnic sites. The Corps is completing compliance activities related to Section 106 and Section 110 of the National Historic Preservation Act and planned maintenance activities will minimizing any potential effects to the historic character of the mill and adjacent areas. These visitor facility improvements and historic building maintenance activities illustrate the Army Corps of Engineers' continued stewardship and financial investment in

³⁹ Kentucky Department of Revenue, "Coal Severance," <http://revenue.ky.gov/Property/Coal-Severance/Pages/default.aspx>; Kentucky Revised Statutes Chapter 143, <http://www.lrc.ky.gov/Statutes/chapter.aspx?id=37685>.

⁴⁰ Jason Bailey, "Investing in a Future for Appalachian Kentucky: The Coal Severance Tax," *Kentucky Center for Economic Policy*, April 21, 2013, <http://www.kypolicy.us/sites/kcep/files/Coal%20Severance%20Presentation.pdf>.

key historic resources within the study area and continued adherence to federal standard of compliance and historic preservation.

In evaluating the need for direct National Park Service management, the study must determine that the National Park Service is clearly the superior alternative. Currently, the Mill Springs Battlefield Association is protecting the battlefield, interpreting its story, and providing a high quality visitor experience. Likewise, the US Army Corps of Engineers – Nashville District protects and manages the mill site, while providing opportunities for visitors to experience the site. At the time of this study, the battlefield association and Army Corps of Engineers appear capable of continuing their roles in the management of resource associated with the Battle of Mill Springs and continuing to provide high quality opportunities for visitors to enjoy the area. Their continued management of the lands within the study area would be the most effective and efficient management alternative. Given the limitations of the National Park Service because of the current deferred maintenance backlog as well as the budgetary and staffing challenges as outlined in Criterion 3: Feasibility, these factors significantly prevent the National Park Service from effectively functioning as a clearly superior alternative for the management of the Mill Springs Battlefield, when compared with other successful management entities already in place. Based on this analysis, it cannot be demonstrated that direct National Park Service management is needed or that National Park Service management would necessarily be considered the superior alternative for accomplishing the protection of resources associated with the Battle of Mill Springs and enhancing visitor experiences of the study area.

Study Finding on Criterion 4 - Need for Direct NPS Management

Based on the analysis of existing management entities currently operating within the study area, there is no immediate need for direct National Park Service management of the Mill Springs Battlefield study area, and criterion 4 is not met. Given the ongoing and successful work of the Mill Springs Battlefield Association as well as the Army Corps of Engineers - Nashville District, National Park Service management would not be considered a “clearly superior alternative.”

POTENTIAL RECOGNITION AS A NATIONAL PARK SERVICE AFFILIATED AREA

Although this special resource study finds that the Mill Springs Battlefield study area does not meet all four criteria for consideration as a potential new unit of the National Park Service, the battlefield may be considered for recognition as an affiliated area of the National Park Service. Currently, the National Park Service provides some technical support to the battlefield through the National Historic Landmarks Program and the American Battlefield Protection Program. However, because the Mill Springs Battlefield study area has met Criterion 1 - National Significance and Criterion 2 -

Suitability for inclusion in the national park system, the Mill Springs Battlefield study area may be eligible for affiliated area status.

Outlined in the National Park Service System Plan (2016), affiliated areas are a select group of nationally significant areas. They are neither federally owned nor directly administered by the National Park Service, but benefit from National Park Service brand recognition and are eligible for technical, and in some instances, financial assistance. Legally, they are not units of the national park system. Affiliated areas comprise a variety of locations in the United States and Canada that preserve significant properties outside the national park system. There are currently 25 officially designated affiliated areas. Jamestown National Historic Site in Virginia, Benjamin Franklin National Memorial in Pennsylvania, and Oklahoma City National Memorial in Oklahoma are a few well-known examples of affiliated areas. Affiliated area status enables these sites to receive technical support and special recognition through their association with the National Park Service.

To be considered eligible for affiliated area recognition, the proposed area's resources must meet the following standards:

1. Meet the same standards for national significance and suitability that apply to units of the national park system.
2. Require some special recognition or technical assistance beyond what is available through existing NPS programs.
3. Be managed in accordance with the policies and standards that apply to units of the national park system.
4. Be assured of sustained resource protection, as documented in a formal agreement between the Service and the nonfederal management entity.

Once it has been determined that a proposed area meets these standards, an act of Congress or designation by the Secretary of the Interior is needed to recognize official affiliated area status.

Through this special resource study, it has been determined that the Mill Springs Battlefield study area is both nationally significant and suitable for inclusion in the national park system and thereby meets affiliated area standard 1. Through its designation as a National Historic Landmark and the battlefield association's ongoing engagement with American Battlefield Protection Program, the Mill Springs Battlefield is currently afforded some level of technical support from the National Park Service. Affiliated area status may create new opportunities to work more collaboratively with thematically linked National Park Service units like Cumberland Gap National Historical Park or Fort Donelson National Battlefield. Given the Mill Springs Battlefield Association's past work with NPS ABPP to purchase parcels located in the battlefield and the legal requirements and additional management responsibilities connected to lands acquired using ABPP Battlefield Land Acquisition Grant funds, it can be assumed that the battlefield association is managing the battlefield in accordance with many of the policies and standards that apply to units of the national park system. The association has proven that it has the capacity to protect, research, and interpret the Mill Springs Battlefield. As an acting nonfederal management entity, the association could enter into a formal agreement with the National Park Service to ensure long-term resource protection, if affiliated area recognition was sought as an alternative to national park unit designation.

SPECIAL RESOURCE STUDY FINDINGS AND CONCLUSION

The Mill Springs Battlefield Special Resource Study finds that the Mill Springs Battlefield study area does not meet all four criteria to be considered for inclusion in the national park system. Although the study area does meet Criterion 1 - National Significance and Criterion 2 - Suitability, the study found that the study area does not meet Criterion 3 - Feasibility because of costs and budgetary challenges or Criterion 4 - Need for Direct National Park Service Management. Based on these findings, the Mill Springs Battlefield study area does not meet all four of the criteria required for consideration as a new unit of the national park system.

However, the Mill Springs Battlefield study area and its associated battle related resources could potentially qualify for recognition as a National Park Service affiliated area. Such a designation would recognize the national significance of the battlefield and could provide a venue for continued National Park Service engagement and support in the long-term stewardship of the Mill Springs Battlefield. If affiliated area recognition is pursued, a formal agreement between the National Park Service and the Mill Springs Battlefield Association as the nonfederal management entity would be required. This agreement would establish a formal partnership between the National Park Service and the Mill Springs Battlefield Association, helping ensure the sustained protection of the battlefield and the resources within the study area.

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APPENDIXES

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APPENDIX A: BIBLIOGRAPHY

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APPENDIX B: ACRONYMS

ABPP	American Battlefield Protection Program
BLAG	Battlefield Land Acquisition Grant
CE	Categorical Exclusion
CFR	Code of Federal Regulations
CWT	Civil War Trust
LWCF	Land Water Conservation Fund
MSBA	Mill Springs Battlefield Association
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NPS	National Park Service
NRHP	National Register of Historic Places
PEPC	Planning Environment and Public Comments
SRS	Special Resource Study
FY	Fiscal Year

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APPENDIX C: LEGISLATION AUTHORIZING THIS SPECIAL RESOURCE STUDY: NATIONAL DEFENSE AUTHORIZATION ACT FOR FISCAL YEAR 2015

(PUBLIC LAW 113-291)

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(3) the acquired land shall be administered as part of the Vicksburg National Military Park in accordance with applicable laws (including regulations).

Subtitle D—National Park System Studies, Management, and Related Matters

SEC. 3050. REVOLUTIONARY WAR AND WAR OF 1812 AMERICAN BATTLEFIELD PROTECTION PROGRAM.

Section 7301(c) of the Omnibus Public Land Management Act of 2009 (Public Law 111–11) is amended as follows:

(1) In paragraph (1)—

(A) by striking subparagraph (A) and inserting the following:

“(A) BATTLEFIELD REPORT.—The term ‘battlefield report’ means, collectively—

“(i) the report entitled ‘Report on the Nation’s Civil War Battlefields’, prepared by the Civil War Sites Advisory Commission, and dated July 1993; and

“(ii) the report entitled ‘Report to Congress on the Historic Preservation of Revolutionary War and War of 1812 Sites in the United States’, prepared by the National Park Service, and dated September 2007.”; and

(B) in subparagraph (C)(ii), by striking “Battlefield Report” and inserting “battlefield report”.

(2) In paragraph (2), by inserting “eligible sites or” after “acquiring”.

(3) In paragraph (3), by inserting “an eligible site or” after “acquire”.

(4) In paragraph (4), by inserting “an eligible site or” after “acquiring”.

(5) In paragraph (5), by striking “An” and inserting “An eligible site or an”.

(6) By redesignating paragraph (6) as paragraph (9).

(7) By inserting after paragraph (5) the following new paragraphs:

“(6) WILLING SELLERS.—Acquisition of land or interests in land under this subsection shall be from willing sellers only.

“(7) REPORT.—Not later than 5 years after the date of the enactment of this paragraph, the Secretary shall submit to Congress a report on the activities carried out under this subsection, including a description of—

“(A) preservation activities carried out at the battlefields and associated sites identified in the battlefield report during the period between publication of the battlefield report and the report required under this paragraph;

“(B) changes in the condition of the battlefields and associated sites during that period; and

“(C) any other relevant developments relating to the battlefields and associated sites during that period.

“(8) PROHIBITION ON LOBBYING.—None of the funds provided pursuant to this section shall be used in any way, directly or

indirectly, to influence congressional action on any legislation or appropriation matters pending before Congress.”.

(8) In paragraph (9) (as redesignated by paragraph (6)), by striking “2014” and inserting “2021”.

SEC. 3051. SPECIAL RESOURCE STUDIES.

(a) *IN GENERAL.*—The Secretary of the Interior (referred to in this section as the “Secretary”) shall conduct a special resource study regarding each area, site, and issue identified in subsection (b) to evaluate—

- (1) the national significance of the area, site, or issue; and
- (2) the suitability and feasibility of designating such an area or site as a unit of the National Park System.

(b) *STUDIES.*—The areas, sites, and issues referred to in subsection (a) are the following:

(1) *LOWER MISSISSIPPI RIVER, LOUISIANA.*—Sites along the lower Mississippi River in the State of Louisiana, including Fort St. Philip, Fort Jackson, the Head of Passes, and any related and supporting historical, cultural, or recreational resource located in Plaquemines Parish, Louisiana.

(2) *BUFFALO SOLDIERS.*—The role of the Buffalo Soldiers in the early years of the National Park System, including an evaluation of appropriate ways to enhance historical research, education, interpretation, and public awareness of the story of the stewardship role of the Buffalo Soldiers in the National Parks, including ways to link the story to the development of National Parks and the story of African-American military service following the Civil War.

(3) *ROTA, COMMONWEALTH OF NORTHERN MARIANA ISLANDS.*—Prehistoric, historic, and limestone forest sites on the island of Rota, Commonwealth of the Northern Mariana Islands.

(4) *PRISON SHIP MONUMENT, NEW YORK.*—The Prison Ship Martyrs’ Monument in Fort Greene Park, Brooklyn, New York.

(5) *FLUSHING REMONSTRANCE, NEW YORK.*—The John Bowne House, located at 3701 Bowne Street, Queens, New York, the Friends Meeting House located at 137-17 Northern Boulevard, Queens, New York, and other resources in the vicinity of Flushing, New York, relating to the history of religious freedom during the era of the signing of the Flushing Remonstrance.

(6) *WEST HUNTER STREET BAPTIST CHURCH, GEORGIA.*—The historic West Hunter Street Baptist Church, located at 775 Martin Luther King Jr. Drive, SW, Atlanta, Georgia, and the block on which the church is located.

(7) *MILL SPRINGS BATTLEFIELD, KENTUCKY.*—The area encompassed by the National Historic Landmark designations relating to the 1862 Battle of Mill Springs located in Pulaski and Wayne Counties in the State of Kentucky.

(8) *NEW PHILADELPHIA, ILLINOIS.*—The New Philadelphia archaeological site and surrounding land in the State of Illinois.

(c) *CRITERIA.*—In conducting a study under this section, the Secretary shall use the criteria for the study of areas for potential inclusion in the National Park System described in section 8(c) of Public Law 91–383 (commonly known as the “National Park System General Authorities Act”) (16 U.S.C. 1a–5(c)).

(d) *CONTENTS.*—Each study authorized by this section shall—

(1) determine the suitability and feasibility of designating the applicable area or site as a unit of the National Park System;

(2) include cost estimates for any necessary acquisition, development, operation, and maintenance of the applicable area or site;

(3) include an analysis of the effect of the applicable area or site on—

(A) existing commercial and recreational activities;

(B) the authorization, construction, operation, maintenance, or improvement of energy production and transmission or other infrastructure in the area; and

(C) the authority of State and local governments to manage those activities;

(4) include an identification of any authorities, including condemnation, that will compel or permit the Secretary to influence or participate in local land use decisions (such as zoning) or place restrictions on non-Federal land if the applicable area or site is designated as a unit of the National Park System; and

(5) identify alternatives for the management, administration, and protection of the applicable area or site.

(e) **REPORT.**—Not later than 3 years after the date on which funds are made available to carry out a study authorized by this section, the Secretary shall submit to the Committee on Natural Resources of the House of Representatives and the Committee on Energy and Natural Resources of the Senate a report that describes—

(1) the findings and recommendations of the study; and

(2) any applicable recommendations of the Secretary.

SEC. 3052. NATIONAL HERITAGE AREAS AND CORRIDORS.

(a) **EXTENSION OF NATIONAL HERITAGE AREA AUTHORITIES.**—

(1) **EXTENSIONS.**—

(A) Section 12 of Public Law 100-692 (16 U.S.C. 461 note; 102 Stat. 4558; 112 Stat. 3258; 123 Stat. 1292; 127 Stat. 420; 128 Stat. 314) is amended—

(i) in subsection (c)(1), by striking “2015” and inserting “2021”; and

(ii) in subsection (d), by striking “2015” and inserting “2021”.

(B) Division II of Public Law 104-333 (16 U.S.C. 461 note) is amended by striking “2015” each place it appears in the following sections and inserting “2021”:

(i) Section 107 (110 Stat. 4244; 127 Stat. 420; 128 Stat. 314).

(ii) Section 408 (110 Stat. 4256; 127 Stat. 420; 128 Stat. 314).

(iii) Section 507 (110 Stat. 4260; 127 Stat. 420; 128 Stat. 314).

(iv) Section 707 (110 Stat. 4267; 127 Stat. 420; 128 Stat. 314).

(v) Section 809 (110 Stat. 4275; 122 Stat. 826; 127 Stat. 420; 128 Stat. 314).

(vi) Section 910 (110 Stat. 4281; 127 Stat. 420; 128 Stat. 314).

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APPENDIX D: ITEMIZED ONE-TIME CONSTRUCTION COST ESTIMATES

Gross cost estimates are presented in Fiscal Year 2016 dollar amounts and include base construction, federal mark up, management, contingency, and design and compliance costs for the following facilities that fall within the Mill Springs Battlefield Study Area.

Mill Springs Visitor Center and Museum	
Activity	Potential Development Cost
Miscellaneous exterior repairs and ABAAS hardware installation	\$14,000
Roof replacement – cyclic maintenance	\$15,000
Restroom updates	\$35,000
Renew interior finishes(paint, recoat)	\$250,000
Replace critical HVAC pumps	\$94,000
Fire protection system code requirements	\$40,000
Repair exterior sidewalk lights	\$15,000
Interior demolition related to office space configuration	\$30,000
Landscape/site improvements – dependent on cultural landscape report	\$42,000
Water fountain plumbing	\$5,000
Office space reconfiguration	\$380,000
Museum upgrades	\$275,000
Total base construction cost	\$1,195,000
Total gross construction cost (Base cost + federal management + contingency)	\$2,117,000
Total design and compliance	\$395,000
TOTAL CONSTRUCTION COST (Gross cost + design & compliance)	\$2,512,000

Zollicoffer Park and Beech Grove Potential Development Costs	
Activity	Potential Development Cost
Trail delineation	\$8,000
Gazebo repairs	\$3,000
Bridge repairs	\$3,000
Zollicoffer Monument restoration	\$14,000
Zollicoffer headquarters ruin stabilization	\$9,000
Total base construction cost	\$37,000
Total gross construction cost (Base cost + federal management + contingency)	\$67,000
Total design and compliance	\$17,000
TOTAL CONSTRUCTION COST (Gross cost + design & compliance)	\$84,000

Brown-Lanier House Potential Development Costs	
Activity	Potential Development Cost
Brown-Lanier House Historic Structure Report	\$50,000
Minor repair/repointing of foundation brick	\$8,000
Miscellaneous exterior repairs and ABAAS hardware installation	\$56,000
Minor roof flashing repair	\$7,000
Restroom updates to modernize and meet ABAAS	\$35,000
Renew interior finishes (paint, recoat)	\$120,000
Plumbing upgrade	\$10,000
Fire protection system code requirements	\$40,000
Upgrade electrical system	\$95,000
Landscape/site improvements – dependent on cultural landscape report	\$42,000

Split rail fence repair	\$3,000
Pave roadway and parking lot	\$32,000
Total base construction cost	\$498,000
Total gross construction cost (Base cost + federal management + contingency)	\$844,000
Total design and compliance	\$148,000
TOTAL CONSTRUCTION COST (Gross cost + design & compliance)	\$992,000

West-Metcalf House Potential Development Costs	
Activity	Potential Development Cost
West-Metcalf House Historic Structure Report	\$12,000
Minor foundation touch-up	\$3,000
Minor basement work	\$7,000
Add accessibility ramp	\$3,000
Minor roof repairs	\$1,000
Minor interior finish work following historic structure report recommendations	\$20,000
Upgrade electrical system	\$15,000
Total base construction cost	\$61,000
Total gross construction cost (Base cost + federal management + contingency)	\$100,000
Total design and compliance	\$17,000
TOTAL CONSTRUCTION COST (Gross cost + design & compliance)	\$117,000

Noncontributing Buildings Potential Development Costs	
Activity	Potential Development Cost
Historic structure reports for tobacco barns	\$45,000
Metal double-door barn rehabilitation	\$58,000
Tobacco storage barn #1 rehabilitation	\$127,000
Tobacco storage barn #2 rehabilitation	\$62,000
Tobacco storage barn #3 rehabilitation	\$101,000
Total base construction cost	\$393,000
Total gross construction cost (Base cost + federal management + contingency)	\$696,000
Total design and compliance	\$111,000
TOTAL CONSTRUCTION COST (Gross cost + design & compliance)	\$807,000

Noncontributing Buildings Potential Demolition Costs	
Activity	Potential Development Cost
Double-door garage demolition	\$52,000
Barn and silo demolition	\$66,000
Abandoned house demolition and site mitigation	\$80,000
Total base construction cost	\$198,000
Total gross construction cost (Base cost + federal management + contingency)	\$343,000
Total design and compliance	\$20,000
TOTAL CONSTRUCTION COST (Gross cost + design & compliance)	\$363,000

Mill Springs Mill Potential Development Costs*	
Activity	Potential Development Cost
Mill Springs Mill Historic Structure Report	\$50,000
Repair foundation	\$75,000
Superstructure improvements	\$42,000
Cyclical exterior painting (cyclical maintenance)	\$24,000
Roof repairs	\$35,000
Interior construction	\$45,000
Minor repairs to interior stairs	\$4,000

Renew interior finishes (paint, stain) (cyclical maintenance)	\$21,000
Install fire protection system	\$148,000
Upgrade electrical system	\$15,000
Interior mill equipment stabilization	\$10,000
Address wheel/water works leak	\$10,000
Inlet water piping spring repair	\$3,000
Exterior wall repointing/repair	\$10,000
Site and building stabilization	\$9,000
Total base construction cost	\$501,000
Total gross construction cost (Base cost + federal management + contingency)	\$830,000
Total design and compliance	\$237,700
TOTAL CONSTRUCTION COST (Gross cost + design & compliance)	\$1,067,700
*One time repair and rehabilitation costs provided by the Army Corps of Engineers	

Mill Springs Park Restrooms Potential Development Costs	
Activity	Potential Development Cost
Repoint rear wall	\$1,000
Replace cedar roof shingles (cyclical maintenance)	\$3,000
Replace restrooms appurtenances	\$4,000
Renew interior finishes	\$3,000
Minor plumbing updates	\$5,000
Canned lift station rehabilitation and replacement	\$8,000
Total base construction cost	\$24,000
Total gross construction cost (Base cost + federal management + contingency)	\$43,000
Total design and compliance	-
TOTAL CONSTRUCTION COST (Gross cost + design & compliance)	\$43,000

Mill Springs Park Facilities and Landscape Development Costs	
Activity	Potential Development Cost
Superstructure improvements	\$1,000
Exterior rehabilitation	\$2,000
Roofing	\$1,000
Stairs	\$1,000
Cannon preservation	\$5,000
Grill/picnic table replacement	\$4,000
Trail delineation	\$8,000
Gazebo repairs	\$3,000
Bridge repairs	\$3,000
Cobble walkway repairs	\$3,000
Split rail fence repairs	\$4,000
Dock repairs	\$9,000
Overlay installation	\$11,000
Total base construction cost	\$55,000
Total gross construction cost (Base cost + federal management + contingency)	\$97,000
Total design and compliance	\$1,000
TOTAL CONSTRUCTION COST (Gross cost + design & compliance)	\$98,000

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APPENDIX E: ENVIRONMENTAL SCREENING FORM CATEGORICAL EXCLUSION



National Park Service
U.S. Department of the Interior

Denver Service Center
Date: 03/2017

Categorical Exclusion Form

Project: Mill Springs Battlefield Special Resource Study

PEPC Project Number: 58557

Description of Action (Project Description):

Special Resource Study to evaluate the Mill Springs Battlefield for consideration for inclusion within the national park system.

Project Locations:

Location 1

County: Wayne **State:** KY

Location 2

County: Pulaski **State:** KY

Mitigation(s):

- No mitigations identified.

CE Citation: CEs for Which No Formal Documentation is Necessary

3.3 code = R, Adoption or approval of surveys, studies, reports, plans and similar documents which will result in recommendations or proposed actions which would cause no or only minimal environmental impact.

Explanation:

CE3.2R is the appropriate NEPA pathway for the Mill Springs Special Resource Study because the study would result in no environmental impact. The study is intended to provide Congress with information about the resource qualities of the study area and alternatives for protection. Although the study has implications for potential future NPS actions, it will not result in environmental impacts unless Congress takes action.

Decision: I find that the action fits within the categorical exclusion above. Therefore, I am categorically excluding the described project from further NEPA analysis. No extraordinary circumstances apply.

Regional

Director: _____ **Date:** _____

Extraordinary Circumstances:

If implemented, would the proposal...	Yes/No	Notes
A. Have significant impacts on public health or safety?	No	
B. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas?	No	
C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?	No	
D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	
E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No	
F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?	No	
G. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office?	No	
H. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?	No	
I. Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?	No	
J. Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No	
K. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or adversely affect the physical integrity of such sacred sites (EO 130007)?	No	
L. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112)?	No	

APPENDIX F: ORGANIZATIONS AND INDIVIDUALS CONTACTED REGARDING THE MILL SPRINGS BATTLEFIELD SPECIAL RESOURCE STUDY

As part of the special resource study the planning process, the study team informed and sought input from a number of organizations and subject matter experts to better understand the Mill Springs Battlefield and its associated resources, to identify possible concerns or issues, and to obtain information that was essential in the analysis and evaluation of the study area.

The following individuals, governmental and nongovernmental organizations were informed about the Special Resource Study process and associated public open houses.

Federal Agencies

Mill Springs National Cemetery
National Cemetery Administration, Southeast District
US Army Corps of Engineers, Nashville District
US Army Corps of Engineers, Great Lakes & Ohio River Division
US Fish & Wildlife Service: Southeast Region (Region 4)

Congressmen

Office of Senator Mitch McConnell
Office of Senator Rand Paul
Office of Congressman Hal Rogers

State of Kentucky

Office of the Governor
Kentucky Department for Natural Resources
Kentucky Department of Fish & Wildlife Resources
Kentucky Department of Travel and Tourism
Kentucky Heritage Council
Kentucky State Historic Preservation Office
Kentucky Transportation Cabinet

Local Government

Pulaski County Government
Wayne County Local Government

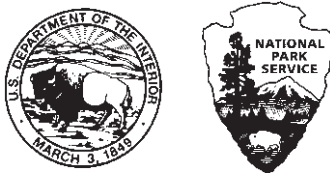
Other Organizations

Mill Springs Battlefield Association
Monticello-Wayne County Chamber of Commerce
Somerset-Pulaski Convention & Visitors Bureau
Somerset-Pulaski County Development Foundation

Other Individuals

Private landowners within the study area

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

NPS/MSBA/DSCP/P99/140400 DECEMBER 2017



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Mill Springs Battlefield Special Resource Study

