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Consultation and Coordination

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Chapter 5: Consultation and Coordination

5.1 Introduction

Many public agencies; federal, state, and local governments; nonprofit organizations; institutions; and individual citizens have an interest in deer management at Valley Forge NHP. Reaching out to these interested parties for their ideas and expertise and listening to their concerns is an important step in the development of the plan/EIS. A combination of activities, including internal workshops, formal public meetings, and agency and government briefings has helped the NPS gain important guidance in developing alternatives for the plan/EIS.

This chapter describes the public involvement and agency coordination used during the preparation of the plan/EIS. It provides a detailed list of the various consultations held during the scoping and alternatives development phases of the project. The list of recipients for this document also is provided.

5.2 The Scoping Process

The NPS divides the scoping process into two parts: internal scoping and external or public scoping. Internal scoping involves discussions among NPS personnel regarding the purpose of and need for management actions, issues, management alternatives, mitigation measures, the analysis boundary, appropriate levels of documentation, available references and guidance, and other related topics. Internal scoping also includes early contact with federal, state, and local agencies; and Indian tribes with jurisdiction by law or special expertise over some aspect of the proposed action (see Section 5.3).

Public scoping is the early involvement of the interested and affected public in the environmental analysis process. This helps to ensure that people have an opportunity to comment and contribute early in the decision-making process. For this plan/EIS, project information was distributed to individuals, agencies, and organizations at the initiation of the scoping process, and people were given opportunities to express concerns or views and to identify important issues or even suggest other alternatives. The following sections describe the various ways scoping was conducted for this plan/EIS.

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5.2.1 Internal Scoping and Planning

An internal scoping meeting was held on September 12 and 13, 2006 to discuss the management of white-tailed deer as part of a healthy and functioning ecosystem at Valley Forge NHP. The goal of this meeting was to determine the purpose, need, and objectives for managing deer at the park, as well as to identify issues and concerns associated with the deer populations and their impact on the park ecosystem. Preliminary alternative management strategies were discussed. The results of the meeting were captured in an Internal Scoping Report (NPS 2006b), which is on file as part of the administrative record for the plan/EIS.

For many years, Valley Forge NHP staff has coordinated with technical experts and researchers to develop and use methods and protocols for monitoring white-tailed deer population size and forest plant communities within the park. A number of the same scientists and technical experts were invited to become part of the science teams that provided technical background information and researched references during preparation of the deer management plan. The team participants were limited to persons with scientific background in deer management and research, vegetation management and monitoring, and CWD; NPS staff; and others who have background experience with the park or park ecosystems (see References: Planning Team, Contributors, and Consultants).

The purpose of the science team discussions was to provide a technical framework for the development of alternatives for the deer management plan and the CWD response plan. The first team focused on the deer management alternatives and convened via conference calls, meeting five times over a three-month period (January-March, 2007). The topics of discussion included existing conditions at the park, existing data and monitoring, desired forest composition, population goals for deer, approach to establishing action thresholds and indicator species, and logistics required for various management methods. Following the science team's final meeting, an internal report was prepared to document the group's discussions and recommendations (NPS 2007g). This report was used to inform the development of alternatives.

The second science team, which focused on CWD, was composed of regional and national wildlife management experts from the NPS and PGC (see References: Planning Team, Contributors, and Consultants). The group participated in several phone meetings in June 2008 to discuss and review existing literature, studies, and professional experience related to CWD. The group's discussion focused on the park's proposed response to CWD within the park and its consistency with *Pennsylvania's Chronic Wasting Disease Response Plan* (PCWDTF 2007, 2008). A summary memorandum was prepared to document the results of the group's discussions and recommendations (NPS 2008d). This memorandum was used to inform the CWD Response Plan for Valley Forge NHP (see Appendix C).

Further internal planning occurred following the public and agency review of the Draft plan/EIS. The planning team met and conducted several conference calls to review the comments on the document, identify means of improving the plan to respond to these comments, and provide responses to substantive comments (See Appendix F: Comments and Responses on the Draft Plan/ Environmental Impact Statement).

5.2.2 Public Scoping

Since the beginning of the planning process for the plan/EIS, the NPS has reached out to stakeholders including the general public, interested individuals, local governments, organizations, and agencies having jurisdiction by law or expertise for assistance in determining the scope of the plan. At different points in the development of the plan/EIS, the NPS provided information and updates via newsletters, news releases, public meetings, the park website, and briefings. A Public Comment Analysis Report (NPS 2007f) was prepared to document the results of the public scoping process. This document was provided for public review on the park web site and is included as part of the administrative record. Table 16 provides a running list of the briefings, consultations, and public involvement activities, and a summary of the public meetings and comments received throughout the scoping period is provided below.

Table 16 Running List of Briefings, Consultations, and Public Involvement

Date	Description
2006	
6/28	Scoping meeting with PGC
9/1	Briefing to West Chester University population biology class
9/12	Internal scoping meeting with interdisciplinary planning team
9/13	Internal scoping meeting with interdisciplinary planning team (cont.)
9/14	Press conference to announce initiation of deer management planning
9/15	Purpose, need, objectives, management strategies, and public meeting dates electronically distributed to Friends of Valley Forge
9/19	Internal scoping meeting with Valley Forge NHP Maintenance Division
9/20	Internal scoping meeting with Valley Forge NHP Administration and Interpretive Divisions
9/20	Superintendent briefing to Rotary Club
9/26	Briefing to Open Land Conservancy board members
9/27	Internal scoping meeting with Valley Forge NHP Interpretation Division
9/27	Superintendent briefing to Tredyffrin Township officials
9/28	Internal scoping with Valley Forge NHP Law Enforcement Division
10/24	Briefing at the Farm Park Preservation Association annual meeting
11/2	Consultation initiated with following tribes: Oneida Indian Nation, Oneida Nation of Wisconsin, Delaware Nation, and the Stockbridge-Munsee Community.
11/4	Briefing at the Upper Merion Parks and Historic Foundation annual meeting
11/8	Public scoping meeting at Valley Forge NHP Education Center
11/9	Public scoping meeting at Tredyffrin Township Building
11/20	Briefing for Springford Area School District 7th grade teachers
12/7	Agency scoping meeting with DCNR Bureau of Forestry
12/12	Consultation initiated with the Pennsylvania Natural Heritage Program, Advisory Council on Historic Preservation, U.S. Fish and Wildlife Service, and the Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation
12/20	Briefing for students at the Armenian Sisters Academy
2007	
1/18	Superintendent briefing with Senator Spector's staff in Washington, D.C.
1/20	Briefing for students at Norristown High School
1/26	Superintendent briefing for Senator John Rafferty and staff member
2/1	Superintendent briefing for Senator Connie Williams and staff member
2/1	Superintendent briefing for Community Garden Club of Wayne
2/2	Briefing with Will McWilliams, USDA Forest Service
2/6	Superintendent briefing for Upper Merion Township Manager
2/7	Superintendent briefing for Tredyffrin Township Manager
2/9	Superintendent briefing with Senator James Gerlach
2/23	Superintendent briefing with West Norriton Township Manager
3/14	Briefing at Open Land Conservancy annual meeting
3/15	Superintendent briefing for Lower Providence Township Manager
4/17	Briefing and park tour with students from Bryn Mawr College
4/28	Guided walk for Open Land Conservancy Preserve Managers
4/30	Presentation for Garden Club of America
7/10	Site visit by USDA Forest Service and DCNR, Bureau of Forestry staff
8/10	Discussion on deer management techniques with Owen Prusack, Chester County Parks and Recreation Department
8/14	Discovery Educators tour
8/15	Alternatives development meeting with interdisciplinary planning team
8/16	Alternatives development meeting with interdisciplinary planning team (cont.)
9/5	Discussion on deer management techniques with Barry Bessler, FPC
9/17	Telephone update for new Schuylkill Township Supervisor
10/3	Congressional staff visits in Washington, D.C.
10/11	Guided tour for DCNR, Bureau of Forestry Annual District Foresters Meeting
10/19	Briefing for the Sierra Club
11/12	Participation in Chester County Deer Forum Meeting
11/16	Presentation at Great Valley High School

Table 16 Running List of Briefings, Consultations, and Public Involvement (continued)

Date	Description
2008	
1/10	Superintendent presentation to 59ers group
1/23	Superintendent briefing for Representative Carole Rubley
1/24	Superintendent briefing for Tredyffrin Township Board of Supervisors
1/29	Superintendent briefing for representatives at Senator Specter's office and Congressman Sestak's office in Washington, D.C.
2/2	Superintendent briefing for Legislative Staff, Resources Committee
2/2	Presentation to the Gulph Mills Civic Association
2/13	Presentation to Norristown Area High School environmental science students
3/3	Superintendent briefing for Congressman Gerlach
3/12	Presentation to the Bryn Mawr Kiwanis Club
4/2	Presentation to staff and volunteers at Hopewell Furnace National Historic Site
4/9	Superintendent briefing for Montgomery County Commissioner
4/15	Presentation to the Philadelphia Garden Club
4/18	Presentation to the Great Valley High School Ecology Club
4/23	Superintendent briefing for Representative Mike Vereb
4/28	Superintendent briefing for Montgomery County Commissioner
5/7	Superintendent briefing for representatives at Senator Specter's office, Congressman Sestak's office, and Congressman Gerlach's office in Washington, D.C.
6/7	Interpretive Table at 2008 National Trails Day
7/3	Interview with the Philadelphia Inquirer
9/3	Briefing with NPS Northeast Region Director
9/3	Presentation to the Glen Hardie Garden Club
9/4	Superintendent briefing for representatives at Senator Specter's office, Congressman Sestak's office, Congressman Gerlach's office, and NPS Director of Natural Resource Stewardship and Science
9/9	Briefing with NPS Resource Stewardship Planning Team
9/11	Interview with the Suburban and Wayne Times
9/25	Superintendent briefing for Senator Pat Rafferty
9/25	Interview with Daily Local News
9/26	Superintendent briefing for Senator Andy Dinniman
9/30	Superintendent briefing for NPS Washington Office staff
9/30	Continental Chronicle article
10/3	Briefing to Pennsylvania Game Commission Southwest Regional Office
10/7	Presentation to the Philadelphia Chamber of Commerce
10/21	Briefing by NPS Associate Director, Natural Resource Stewardship and Science to Deputy Assistant Secretary for Fish, Wildlife, and Parks
10/22	Presentation to the Sierra Club
11/12	Superintendent briefing for Representative Connie Williams
11/22	Briefing for Congressman Joe Sestak
12/5	Superintendent briefing for representatives of Senator Casey and Congressman Sestak
12/15	Briefing for Natural Resource Condition Assessment Team
2009	
1/7	Presentation to park staff, volunteers, and Friends group
1/8	Presentation at the Valley Forge Chapter of Trout Unlimited January Meeting
1/9	Presentation to park staff, volunteers, and Friends group
1/14	Public meeting Tredyffrin Township Building
1/15	Public meeting at Valley Forge NHP Education Center
1/21	Briefing at Valley Creek Partnership Meeting
1/26	Briefing at meeting of local police chiefs
2/3	Superintendent briefing for the Main Line Chamber of Commerce
3/11	Inquiry response to Congressman Jim Gerlach
3/11	Presentation at the Friends of the Wissahickon Board of Directors meeting
3/12	Briefing for The Wafarers

Table 16 Running List of Briefings, Consultations, and Public Involvement (continued)

Date	Description
2009 (continued)	
3/30	Presentation to Rotary Club
4/29	Presentation at the Great Valley Middle School Envirothon
5/19	Briefing to seasonal park staff and volunteers
6/22	Superintendent Briefing to NPS Northeast Region Deputy Regional Director
6/6	Briefings at 2009 National Trails Day
6/25	Briefing for Stroud Teacher's Workshop
7/9	Briefing by NPS Associate Director, Natural Resource Stewardship and Science to NPS Acting Director
7/10	Press Tour for the Valley Forge Convention and Visitors Bureau
8/17	Request for determination of concurrence with the NPS determination of effect sent to the Advisory Council on Historic Preservation and the Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation

Two public scoping meetings were held to initiate the public involvement process early in the planning stage and to obtain community feedback on the initial concepts for deer management at Valley Forge NHP. The first meeting was held on November 8, 2006 from 1:00 pm to 4:00 pm at the park's Education Center in King of Prussia, Pennsylvania. On November 9, 2006 a second meeting was held from 6:00 pm to 9:00 pm at the Tredyffrin Township Building. The public scoping meetings were advertised through a mass mailing of the public scoping brochure to over 4,000 individuals. They were also announced on the park's web site, posted on park kiosks, announced through press releases and newspapers, as well as postings at public libraries.

A total of 153 meeting attendees signed in during the two meetings. Prior to the meetings, attendees had an opportunity to observe displays illustrating the study area, purpose and need, plan objectives, deer population monitoring, vegetation monitoring and impacts, deer home range and movements, the history of deer management at the park, and the estimated project schedule as it relates to the NEPA process. The meetings were held in an open house format, so guests could come and go as they pleased. Each meeting began with a presentation by park staff on the background of the project. The presentation was followed by breakout sessions that allowed the guests to discuss issues with the planning team in small groups.

Members of the planning team served as moderators and were note takers for each breakout group. Comments made during the breakout sessions were recorded on large flip charts. If the commenter did not want to make comments at the breakout sessions, comments sheets were available at the sign-in table. Guests could fill out the forms and submit them at the meeting or mail them to the park at any time during the public scoping comment period, which ended December 8, 2006. Those attending the meeting were also directed to the public scoping meeting brochure, which provided additional opportunities for comment on the project, including directing comments to the NPS's PEPC web site at <<http://parkplanning.nps.gov/vafo>> or the park web site at <www.nps.gov/vafo>.

During the comment period, 165 pieces of correspondence were received, with 365 comments. Correspondence was received by one of the following methods: e-mail, hard copy letter via mail, or entered into the web-based PEPC system. Approximately 44% of the comments received related to the objectives in taking action, public hunting, lethal reduction with firearms by professionals, reproductive control, and new alternatives or elements. These comments were summarized in the

Public Comment Analysis Report (NPS 2007f) described above. All comments received were considered and used to inform the Draft plan/EIS (see Section 5.4: Document Review and List of Recipients).

5.3 Agency Consultation

Agency consultations are summarized below, and relevant agency correspondence is provided in Appendix B.

5.3.1 Pennsylvania Game Commission

The movements and impacts of white-tailed deer extend beyond the park boundaries; therefore, throughout the planning process the park coordinated closely with the Pennsylvania Game Commission, the agency responsible for managing the state's white-tailed deer population. PGC staff served on both the general science team, as well as the CWD science team. In order to maintain consistency with state efforts, the park closely coordinated with PGC staff on development of the CWD Response Plan. Close coordination with the PGC was needed due to the scale of the area identified as necessary to address CWD (minimum of 79 square miles) relative to park size (5.3 square miles). To further these efforts, PGC staff assisted with facilitation of the public meetings held on the Draft plan/EIS. PGC staff also provided guidance related to capture and relocation of white-tailed deer and the marking of deer treated with chemical reproductive control agents that may travel beyond the park boundary.

The agency was provided with a copy of the Draft plan/EIS and submitted formal comments in an email correspondence dated February 19, 2009. In addition to editorial suggestions, comments related to the impact of deer on adjacent lands, deer-vehicle collisions, concerns with tonsillar biopsy for CWD detection, and more clearly defining the selection of Alternative D over Alternative C.

5.3.2 Tribal Consultations

Consultation was conducted with the following tribes: Oneida Indian Nation, Oneida Nation of Wisconsin, Delaware Nation, and the Stockbridge-Munsee Community. The Oneida were present during the 1777-78 encampment of George Washington's army and maintain an oral tradition of their experiences with the soldiers. Twice a year, the Oneida visit Valley Forge NHP to present interpretive programs focused on their experiences during the encampment. The park has enjoyed a long-standing relationship with all of these tribes. These tribes were included in the GMP planning process and will continue to be included in future park planning efforts. In separate letters, Valley Forge NHP invited tribes to provide information on any features in the park that may hold cultural or religious significance and, if so, to initiate consultation on the plan/EIS.

The Oneida Indian Nation responded in a letter dated November 27, 2006. The Oneida noted that the project did not propose to threaten any cultural or religious bonds the tribe holds with Valley Forge.

The Stockbridge-Munsee Community responded in a letter dated January 17, 2007. The tribe noted the potential for archeological sites to exist within the park that may contain human burial remains and associated funerary objects. The tribe referred the NPS to the State Archeologist and SHPO for guidance on archeological resources

and surveys. The tribe requested to be notified of any unexpected archeological resource that may be discovered during the course of the project.

The Oneida Nation of Wisconsin and the Delaware Nation did not provide a response to the consultation letters sent by the park.

5.3.3 Section 7 Consultation

In a letter dated December 12, 2006, Valley Forge NHP initiated informal consultation with the USFWS about the presence of federally listed rare, threatened, or endangered species in the vicinity of the park. The agency replied in a letter dated January 11, 2007. In the letter, the USFWS noted that the proposed project is within the range of the bog turtle (*Clemmys muhlenbergii*), but that the project scope and activities are not likely to adversely affect the species. There were no other federally listed species identified within the area.

In a letter dated December 12, 2006, Valley Forge NHP initiated informal consultation with the Pennsylvania Natural Heritage Program about the presence of federally listed rare, threatened, or endangered species in the vicinity of the park. The agency replied in a letter dated April 18, 2007. The letter included a list of seven state-listed species that may occur within the project area. It also noted that several of these species were threatened by deer browse.

5.3.4 Section 106 Consultation

The NPS conducted appropriate consultation with the Advisory Council on Historic Preservation and the Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation regarding compliance with Section 106 of the National Historical Preservation Act of 1966. In separate letters dated December 12, 2006, Valley Forge NHP initiated informal consultation with the Advisory Council on Historic Preservation and the Pennsylvania Historical and Museum Commission's Historic Preservation Bureau. The letters not only opened informal consultation with the two agencies, but also made them aware of Valley Forge NHP's intention to use the NEPA documentation to comply with Section 106 of the National Historical Preservation Act of 1966, as amended. In separate letters dated August 17, 2009, the park requested review and formal comment to establish level of concurrence with the determination of effect related to cultural landscapes, historic structures, and archeological resources as presented in the Final plan/EIS.

5.3.5 U.S. Environmental Protection Agency

In accordance with the National Environmental Policy Act and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency reviewed the Draft plan/EIS. In their response letter dated February 13, 2009, the agency rated the Draft plan/EIS as Lack of Objections (LO).

5.4 Document Review and List of Recipients

5.4.1 Review Process for the Deer Management Plan/EIS

The Draft plan/EIS was released for a 60-day public and agency review period beginning December 19, 2008 and ending February 17, 2009. Copies of the document were distributed to individuals, agencies, organizations, and local libraries as indicated below in Section 5.4.2. Public meetings were held January 14-15, 2009. The meetings were held in the same locations and format as the previous meetings. During the 2009 meetings, the NPS presented the alternatives analyzed in the Draft plan/EIS and identified the preferred alternative. Attendees were then divided into small groups where they discussed the proposed alternatives with NPS staff and their consultants. Public comments were recorded on flipcharts and later transcribed for further analysis. Additional comments were received through official public comment forms.

A total of 83 meeting attendees signed in during the two meetings. Attendees could fill out the official public comment forms and submit them at the meeting or mail them to the park at any time during the public comment period, which ended February 17, 2009. During the comment period, 1,168 pieces of correspondence were received. Correspondence was received by one of the following methods: email, hard copy letter via mail, public comment sheet submitted at the public meetings, recorded on flipcharts during the public meetings, or entered directly into the Internet-based PEPC system. Letters received by email or through the postal mail, as well as the comments received from the public meetings, were entered into the PEPC system for analysis. Each of these letters or submissions is referred to as correspondence.

Once all the correspondence was entered into PEPC, each was read, and specific comments within each correspondence were identified. A total of 3,884 comments were derived from the correspondence received. Approximately 46% of the comments received related to general lethal reduction, objectives in taking action, and the preferred alternative (Alternative D). Comments in support of Alternative D: Combined Lethal and Nonlethal Actions were the second most common comment, representing over 12% of the total comments made. The majority of these comments were non-substantive. All substantive comments were grouped by similar themes, and those groups were summarized with a concern statement. The analysis of public comments and NPS responses to concern statements are provided as Appendix F. All comments received were carefully considered and incorporated into this Final plan/EIS. Changes made in the Final plan/EIS as a result of public comments are factual in nature and did not result in changes to the NPS preferred alternative or the outcome of the impact analysis for any of the management alternatives evaluated.

This Final plan/EIS will be made available for public inspection for a 30-day no action period, which begins with publication of the EPA's Notice of Availability. After the 30-day no action period, a Record of Decision (ROD) will be prepared that will document approval of the plan, select the alternative to be implemented, and set forth any stipulations required for implementation. The ROD will be signed by the Northeast Regional Director, after which a Notice of Availability of the ROD will be published in the Federal Register. Publication of the Notice of Availability of the ROD will complete the NEPA process, at which time, the NPS will begin to implement the selected alternative.

5.4.2 List of Recipients

Copies of the Final plan/EIS were distributed to the following government officials and agencies, and nongovernmental organizations and agencies (* indicates receipt of both the Draft and Final plan/EIS). Copies were also provided to individuals upon request. These names are not included below.

Pennsylvania Congressional Delegation

Senator Arlen Specter*
 Senator Bob Casey*
 Representative Jim Gerlach*
 Representative Joe Sestak*

Federal Agencies

Advisory Council on Historic Preservation
 National Park Service, Office of Public Health
 U.S. Department of Agriculture, Animal and Plant Health Inspection Service*
 U.S. Environmental Protection Agency, Office of Environmental Programs, Region III*
 U.S. Fish and Wildlife Service
 U.S. Forest Service

Tribal Nations

Delaware Nation
 Oneida Indian Nation (New York)
 Oneida Nation of Wisconsin
 Stockbridge Munsee Community

Commonwealth Legislative Delegation

Senator John C. Rafferty*
 Senator Andrew E. Dinniman*
 Senator Daylin Leach*
 Representative Mike Vereb*
 Representative Tim Briggs*
 Representative Paul J. Drucker*

Commonwealth Agencies

Pennsylvania Department of Agriculture, Bureau of Animal Health*
 Pennsylvania Department of Conservation and Natural Resources, Bureau of Forestry*
 Pennsylvania Department of Conservation and Natural Resources, Bureau of State Parks*
 Pennsylvania Game Commission, Bureau of Wildlife Management*
 Pennsylvania Historical and Museum Commission

Local Governments

Chester County Commissioners*
Chester County Conservation District*
Chester County Planning Commission*
Fairmount Park Commission*
Montgomery County Commissioners*
Montgomery County Conservation District*
Montgomery County Planning Commission*
Lower Providence Township*
Schuylkill Township*
Tredyffrin Township*
Upper Merion Township*
West Norriton Township*

Organizations and Agencies

Animal Welfare Institute*
Audubon Pennsylvania*
Center for Animals and Public Policy, Tufts University (independent review of Appendix E: Review of White-tailed Deer Reproductive Control)*
Chester County Library and District Center*
Friends of Animals
The Friends of Valley Forge NHP*
Humane Society of the United States*
Montgomery County-Norristown Public Library*
National Parks Conservation Association
Non-lethal Options for Animals*
Open Land Conservancy*
Pennsylvania Deer Association*
Pennsylvania Quality Deer Management Association*
Phoenixville Public Library*
Pity Not Cruelty, Inc.
Responsible Policies for Animals, Inc.*
The Science and Conservation Center (independent review of Appendix E: Review of White-tailed Deer Reproductive Control)*
Sierra Club, Pennsylvania Chapter*
Tredyffrin Public Library*
Upper Merion Township Library*
Valley Forge Convention and Visitors Bureau