



# New Philadelphia Special Resource Study

ILLINOIS



Cover photo: Aerial photo by Tommy Hailey using powered parachute funded by the National Center for Preservation Technology and Training (NPS)

## EXECUTIVE SUMMARY

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### INTRODUCTION

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In December 2014, Congress passed the National Defense Authorization Act (Public Law 113-291). Subtitle D, Section 3051 of this Act authorized the Secretary of the Interior to conduct a special resource study of the archeological site and surrounding land of the New Philadelphia Townsite in the State of Illinois. As directed by Congress, the National Park Service (NPS) has prepared this special resource study to evaluate the potential of the New Philadelphia site to be included within the national park system. The relevant text of Public Law 113-291 is included in appendix A.

On December 29, 2023, President Joe Biden signed the Consolidated Appropriations Act of 2023, establishing New Philadelphia National Historic Site as the 424th national park unit in the national park system (see appendix B for the enabling legislation). Although passage of this law made this special resource study unnecessary, this document contains useful information for the establishment and development of the new park unit.

### RESOURCE OVERVIEW

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The New Philadelphia Townsite is an archeological site in west central Illinois near the town of Barry. New Philadelphia was platted and officially registered by Frank McWorter in 1836. It is the first town known to be platted and registered by an African American before the Civil War and continues to be an important archeological site representing one of the few integrated 19th century rural communities on the Illinois frontier. Today, the town is gone, but its history remains underground. The site has been designated a national historic landmark, and is owned by multiple entities. The surrounding lands are primarily rural and agricultural.

### SUMMARY OF FINDINGS

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Below is a summary of this special resource study's application of the established criteria for new areas of the national park system.

**National Significance**—As a designated national historic landmark, the New Philadelphia Townsite possesses cultural resources that are nationally significant. The study area meets this criterion for inclusion in the national park system.

**Suitability**—The New Philadelphia Townsite represents a cultural resource type that is not already adequately represented in the national park system or protected for public enjoyment by another federal, state, local, nonprofit, or private entity. The study area meets this criterion for inclusion in the national park system.

**Feasibility**—The study area meets feasibility factors for sufficient size and configuration, land ownership patterns, economic and socioeconomic impacts, potential threats, and local support to ensure sustainable resource protection and visitor enjoyment as a new unit of the national park system. However, the establishment, development, and long-term operation and maintenance of the study area as a new national park would incur substantial costs. Implementing cost-effective approaches to removing noncontributing structures; creating visitor experiences expected of the National Park Service; and administering staff, operations, and programs at the site would be required for the site to be feasibly managed by the National Park Service.

**Direct NPS Management**—Direct NPS management may be optimal from the standpoint of offering sustained resource protection and broad interpretive offerings. However, this study finds that the New Philadelphia Association and the Archaeological Conservancy are currently providing adequate resource protection and visitor access to support public enjoyment. Existing NPS programs offer condition monitoring, technical support, educational training, and grant opportunities for research and interpretation.

## CONCLUSION

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As noted above, the New Philadelphia National Historic Site was authorized in 2023. This document fulfills the requirements of the 2014 study legislation and can serve as one of many reference and information sources when considering the future of the New Philadelphia Townsite.

## A GUIDE TO THIS DOCUMENT

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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 NPS findings on the special resource study.

**Chapter 2: Historical Background and Resource Description** provides a historic overview and site description of New Philadelphia, which was founded in 1836 by Frank McWorter. New Philadelphia was the first known town planned and legally registered by a free African American before the Civil War.

**Chapter 3: Evaluation of Study Area for Inclusion in the National Park System** describes the evaluation criteria and findings of the special resource study. Criteria discussed include national significance, suitability, feasibility, and need for direct NPS management.

**Chapter 4: NPS Management Alternatives** presents a range of potential future management alternatives for preservation, protection, and interpretation of the study area. This analysis was conducted, in part, to explore considerations for NPS management, and it helped the National Park Service to fully evaluate potential costs and other topics included in the discussion of feasibility.

**Chapter 5: Public Outreach** describes public outreach efforts conducted by the National Park Service in connection with the study. This includes a summary of major input that was provided by the public during the initial phases of the study.

**The appendixes:** include the legislation authorizing this special resource study and the establishment of New Philadelphia National Historic Site, a compilation of public comments received during outreach efforts, references used in the study, and the study team.

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## CHAPTER 1: STUDY PURPOSE AND BACKGROUND

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### PURPOSE AND NEED

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In 2014, Congress directed the Secretary of the Interior to conduct a special resource study of the New Philadelphia archeological site and surrounding lands in the State of Illinois to determine if the study area would be an appropriate addition to the national park system. Also considered in the study were other alternatives for preservation, protection, and interpretation of the study area by federal, state, or local governmental entities or private or nonprofit organizations. New Philadelphia was the first known town platted and officially registered by an African American, Frank McWorter. In 2009, the site was designated the New Philadelphia Townsite National Historic Landmark in recognition of its historical significance and exceptional value in illustrating the heritage of the United States.

On December 29, 2023, President Joe Biden signed the Consolidated Appropriations Act of 2023, establishing New Philadelphia National Historic Site as the 424th national park unit in the national park system (see appendix B for the enabling legislation and map). Although passage of this law made this special resource study unnecessary, this document contains useful information that can aid in the establishment and development of the new park unit.

### ORGANIZATION OF DOCUMENT

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This study presents information on historic context and existing conditions in “Chapter 2: Historical Background and Resource Description.”

“Chapter 3: Evaluation of Study Area for Inclusion in the National Park System” analyzes the national significance of the New Philadelphia site, its suitability and feasibility for inclusion in the national park system, and its need for direct NPS management.

The legislation that authorized the study directs the National Park Service to “consider other alternatives for preservation, protection, and interpretation of the study area by federal, state, or local governmental entities or private or nonprofit organizations or any other interested individuals.” “Chapter 4: National Park Service Management Alternatives” presents a range of potential future management options, including direct NPS management. In addition to addressing the requirement in the legislation, these scenarios were developed to explore costs and other management considerations and to aid in the evaluation of the feasibility criterion. “Chapter 5: Public Outreach” describes the National Park Service’s efforts to involve the public, including local residents, and to collect public input during the study.

### OVERVIEW OF THE STUDY AREA

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The New Philadelphia Townsite is situated in rural, west central Illinois between the Illinois and Mississippi Rivers in Hadley Township, Pike County. The historic townsite is located off County Highway 2, four miles east of the city of Barry, Illinois (map 1). According to the 2010 census, the population of Barry is approximately 1,300, and the population of Pike County is just over 16,400. Larger cities sit to the west of the study area on the banks of the Mississippi River. Quincy, Illinois, population 41,000, was the site of one of the Abraham Lincoln-Stephen Douglas senate debates in 1858, and is approximately 30 miles away from the New Philadelphia Townsite. Hannibal, Missouri, population 18,000, is a regional heritage tourism hub associated with author Mark Twain and is located 24 miles away from the study area. Barry lies approximately 90 miles west of Springfield, Illinois, and approximately 140 miles southwest of Peoria, both of which are larger population centers.



**Map 1.** New Philadelphia Townsite Vicinity.

The New Philadelphia Townsite is surrounded by farmland. Gently rolling hills support agricultural fields and meadows amidst scattered stands of trees. A few widely spaced houses and farms contribute to the rural character of the setting. US Interstate 72 and US Route 36 run east-west, paralleling each other to the south of the New Philadelphia study area. County Road 2 also runs east-west at the northern edge of the historic town site.

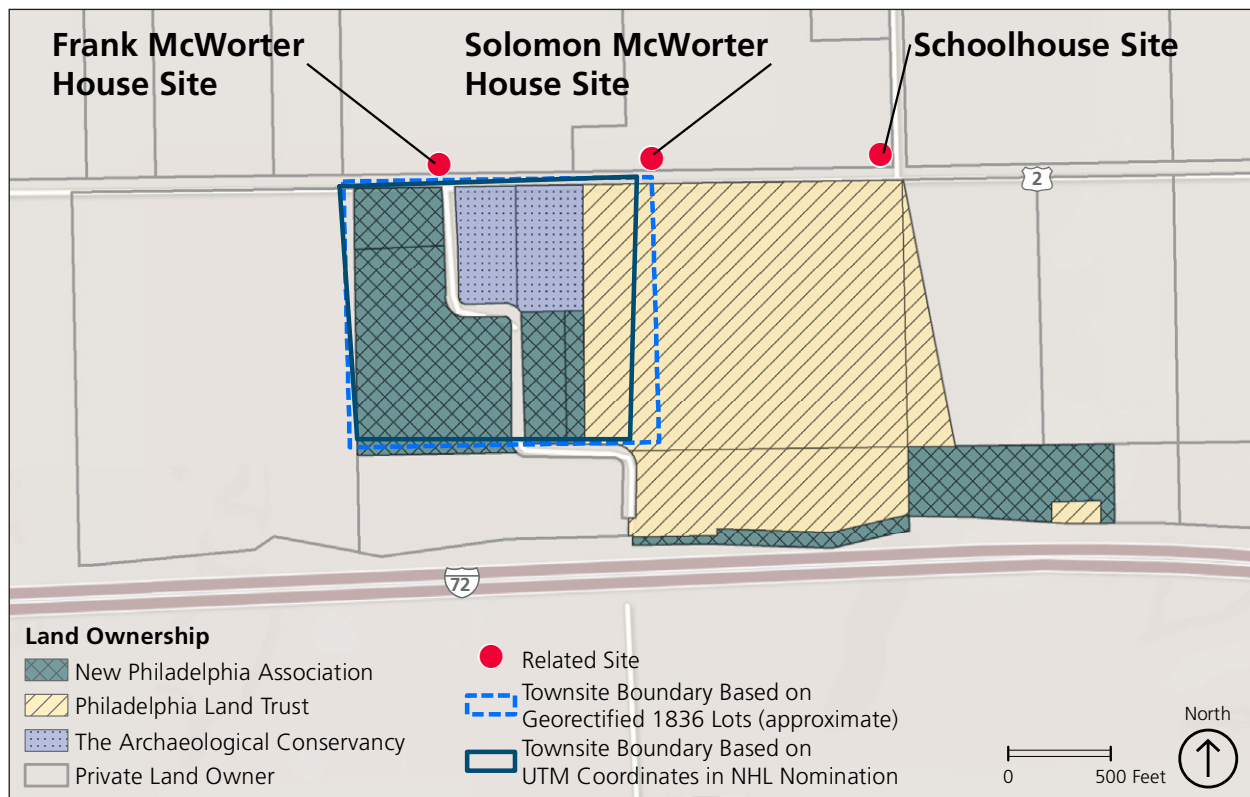
In 2009, the Secretary of the Interior designated the New Philadelphia Townsite as a national historic landmark. The boundaries of the national historic landmark archeological site correspond to the original 42-acre townsite laid out by Frank McWorter in 1836. Ownership of this 42-acre site is a patchwork of community organizations and private individuals (map 2). The New Philadelphia Association, a grassroots nonprofit founded in 1996 to protect New Philadelphia and share the story of its founder Frank McWorter, owns approximately twenty-one acres of the national historic landmark. This small but active organization, with members that include local landowners, McWorter descendants, African-American history advocates, and professional archeologists, has taken lead responsibilities in opening the site to the general public and providing interpretive material online and in the form of a self-guided augmented reality tour that premiered in 2015. The Archaeological Conservancy, the only national nonprofit dedicated to acquiring and conserving archeological sites on private land, owns approximately 10 acres of the northeast quadrant of the site and has previously sponsored university field schools to better understand the importance of New Philadelphia's surviving archeological resources. The remaining portion of the national historic landmark is privately owned, with individual landowners supporting efforts of the New Philadelphia Association and the Archaeological Conservancy through site maintenance and onsite resource protection. Public information about the site, including summaries of past archeological fieldwork and historic information about Frank McWorter and the establishment of New Philadelphia, is available through the New Philadelphia Association and the Archaeological Conservancy websites.

## STUDY METHODOLOGY/PROCESS

The following methodology was used to determine if the New Philadelphia Townsite study area satisfies the special resource study requirements.

1. **Assess public opinion and ideas about managing the site.** Early in the study process, the National Park Service conducted public outreach about the special resource study. The agency collected information on a variety of topics, including the level of public support for the inclusion of the New Philadelphia Townsite within the national park system and other (non-NPS) options for protecting the site's resources and providing opportunities for visitors. Chapter 5 summarizes public outreach activities and input collected during this phase of the study.
2. **Evaluate study area for inclusion in the national park system.** Per Public Law 91-383 Section 8 as amended by Section 303 of the National Parks Omnibus Management Act (Public Law 105-391) and NPS policy, properties must meet certain criteria to qualify as a new unit of the national park system. Potential new units must:
  - possess nationally significant natural and/or cultural resources;
  - be a suitable addition to the national park system;
  - be a feasible addition to the national park system; and
  - require direct management by the National Park Service that cannot or will not be accomplished by another governmental entity or by the private sector.

3. **Evaluate NPS management alternatives.**  
According to NPS policy and guidelines for special resource studies, if the resources meet the criteria for inclusion within the national park system and the need for direct NPS management is identified, then the study process continues with an analysis of management options available within the National Park Service. Legislation authorizing the New Philadelphia SRS directed the National Park Service to identify alternatives for management, administration, and protection of the site. Chapter 4 presents a discussion of management possibilities including NPS direct management. The evaluation of the need for direct NPS management in chapter 3 contains a brief discussion of other potential management frameworks—for instance, continued management by existing site partners or by state or local government agencies.
4. **Transmit study report to Congress.**  
Following completion of this special resource study, the study report and summary findings will be transmitted by the National Park Service to the Secretary of the Interior. The Secretary of the Interior will then transmit the study and a recommendation to Congress.



**Map 2.** New Philadelphia Township with Land Ownership and Related Sites.

## 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 screening form for the New Philadelphia 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). A site visit and public informational meetings were held early in the study process on May 11, 2016, in Barry, Illinois. 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 park or other NPS involvement. Overall, these meetings were well attended, and public support for the study was positive. Public outreach activities are discussed further in chapter 5 of this study.

## ADDITIONAL STUDY REQUIREMENTS

Sec. 3051 of Public Law 113-291 directed the Secretary of the Interior to conduct eight special resource studies to evaluate New Philadelphia and seven other sites for potential designation as units of the national park system. The authorization requires each special resource study to include cost estimates and additional analysis of the effect of the site on existing commercial and recreational activities, energy production and transmission, and the authority of state and local governments to manage those activities. There are no existing commercial activities taking place in the study area, and there do not appear to be opportunities for energy production or transmission at New Philadelphia Townsite. Current recreational opportunities are discussed in chapter 3 and are included in the analysis of the study area’s feasibility. Cost estimates associated with the establishment of a new unit of the national park system at New Philadelphia Townsite are analyzed as part of the feasibility criterion and included in the discussion of direct NPS management alternatives in chapter 4. The study concludes that management by the National Park Service or another entity would not have adverse impacts on commercial or recreational activities and would not affect energy production or transmission.

## STUDY LIMITATIONS

Special resource studies serve as 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 future funding, support, or any subsequent action by Congress, the Department of the Interior, or the National Park Service.

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## CHAPTER 2: HISTORICAL BACKGROUND AND RESOURCE DESCRIPTION

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### INTRODUCTION

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This chapter is divided into two parts: “Historical Background” and “Resource Descriptions.” Both sections contain information that is relevant to the evaluation of study area contained in chapter 3 of this study.

Congress directed the National Park Service to evaluate the New Philadelphia National Historic Landmark archeological site and surrounding lands for inclusion into the national park system. The site contains the remnants of the first known town in the United States legally registered and platted by an African American, Frank McWorter, before the Civil War. Therefore, the “Historical Background” includes a summary of the founding of New Philadelphia, as well as underscoring the importance of New Philadelphia in the larger historic context.

The second section, “Resource Description,” addresses the town site and archeological resources. It contains brief overviews and descriptive information about the study area and related resources.

### HISTORICAL BACKGROUND

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Frank McWorter, the founder of New Philadelphia, was born enslaved in South Carolina in 1777<sup>1</sup>. Around 1795, Frank was relocated by his owner George McWorter to Pulaski County, Kentucky, between the Cumberland and Green Rivers. It was here that Frank saw the benefits of land speculation through his owner’s land purchases. In 1799, Frank married Lucy, a woman enslaved on a farm near George McWorter’s land holding. While George McWorter expanded his real estate holdings in Kentucky and Tennessee during the 1800s, Frank was hired out to other settlers to help clear land and establish farmsteads.

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1. Information about Frank McWorter’s life is summarized from Juliet E. K. Walker, *Free Frank: A Black Pioneer on the Antebellum Frontier* (Lexington: University Press of Kentucky, 1983).

During this time as a farm laborer, he gained highly developed skills related to homesteading and cash farming and was allowed to keep a portion of his earnings. By 1810, Frank expanded his economic activities to include crude niter mining and saltpeter manufacturing near George McWorter’s Pulaski County farm. Frontier settlement and the War of 1812 increased the nationwide demand for saltpeter, a necessary component in gunpowder, as well as its price. Frank was able to produce and profit from saltpeter, and possibly gunpowder, until demand dropped in 1816, a year after the war’s end. He then turned his attention toward mining and processing salt.

These economic ventures were so successful that Frank purchased his wife Lucy’s freedom in 1817. Slave status was transferred from mother to child, so Lucy’s freedom was a priority for Frank to ensure any future children born to the couple would be free. Later in 1817, Lucy and Frank’s fifth child, Squire, was the first member of the family to be born free. Frank purchased his own freedom in 1819, and, on the 1820 federal census, he is recorded as “Free Frank.”

Frank and Lucy McWorter stayed in Kentucky during the 1820s, with Frank operating his salt works and saltpeter works and using his earnings to purchase more than 700 acres of land through state land-granting systems. Frank successfully utilized every economic outlet available to free black men in rural Kentucky at the time—farming, land speculation, and mineral extraction—and started a second saltpeter works in nearby Danville, Kentucky that he eventually traded for his son Young Frank’s freedom in 1829. Spurred by the closing eastern Kentucky frontier, limited economic opportunities, the decreasing demand for saltpeter, and the hardships that came with living as a free black in a slave state, Frank purchased land in the Military Tract of western Illinois from Dr. Galen Elliot, a local physician and War of 1812 veteran.

McWorter subsequently sold his Kentucky holdings, and moved with Lucy and his four free children to Pike County, Illinois, in the fall of 1830 at the age of 55.

Pike County, located in western Illinois, is only 15 miles from the Illinois-Missouri border. During the 1830s, this proximity to a slave state would have been a constant, uncomfortable reminder of the life the McWorters left behind in Kentucky; however, Frank's land was also close to the established Illinois anti-slavery centers of Quincy, Alton, Jacksonville, and Pittsfield. The McWorters became the first settlers in Hadley Township, carving lives for themselves out of the Illinois wilderness. Frank spent his first few years in Illinois using the knowledge gained through years of managing his owner's Kentucky farm to establish his own farmstead. By 1834, he had built a modest log home; cultivated corn, wheat, flax, oats, barley, and potatoes for sale; and raised hogs and horses. The road he cleared from his land to the county seat of Pittsfield became the main route through Pike County. His cash farming was so successful that he raised enough money to return to Kentucky and purchase freedom for his son Solomon in 1835, only four years after he relocated to the Illinois frontier.

During the same year, Frank purchased an 80-acre tract of land directly south of his farmstead from the federal government. On these newly purchased lands, Frank surveyed and platted a 42-acre site as the town of New Philadelphia. In naming this new town, Frank drew inspiration from Philadelphia, Pennsylvania. With its modern municipal services, Philadelphia was considered a model American city in the 19th century and was known as the center of black abolitionist activism in the East. Frank may also have been inspired by a passage in the biblical Book of Revelation that said, "To the church in Philadelphia. . . I know your deeds; that is why I have left before you an open door which no one can close."<sup>2</sup>

The New Philadelphia site was the first of eight tracts that Frank and his sons would purchase between 1835 and 1839 for potential resale and development. McWorter knew from his experiences in Kentucky that acquiring cheap land when it was available would help broaden his economic base. Selling platted town lots would generate additional income. Even after laying out New Philadelphia, Frank and his family continued to live on his original farmstead directly north of the town boundary. This allowed Frank to maximize his potential profit from town lots and continue farming to demonstrate the area's agricultural potential to interested landowners.

New Philadelphia, one of 23 towns founded in Pike County as part of widespread speculation between 1834 and 1837, followed the typical pattern found throughout towns in the Midwest. One hundred and forty-four 60 x 120-foot lots were laid out along a street grid around the two widest streets, Main Street and Broad Way (later renamed Broad Street) (map 3). The first lots sold in 1837 and 1838 were clustered around the King Street and Broad Way intersection, an area that became the population and commercial center of the town. The economic depression of the late 1830s and early 1840s slowed parcel sales and development, but by 1850, New Philadelphia was home to 58 residents, a stagecoach stop, and a post office. It was the only town in Hadley Township to survive the economic downturn and became the social and cultural center of the township for the next 20 years. After Frank McWorter's death in 1854, the town continued to grow. The population almost tripled between 1860 and 1865, hitting a peak population of 160 immediately following the Civil War. The town also fostered its reputation as a market town, allowing farmers in the Pike County hinterland the opportunity to visit the post office, shops, and craftsmen based in New Philadelphia.

Although New Philadelphia is the first known town founded and legally registered by a free African American before the Civil War, Frank McWorter did not envision the town as a solely African-American settlement. McWorter sold lots to black and white settlers with the goal of raising enough funds to purchase the freedom of family members who were still enslaved.

2. Juliet E. K. Walker, "Free Frank and New Philadelphia," *Illinois Periodicals Online*, 2009, accessed November 2016, <http://www.lib.niu.edu/2009/iht09150237.html>.

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At the time, such racially integrated rural settlements were rare. New Philadelphia gradually became the focal point for black activities in the region. Many Pike County residents considered it a “black” town.<sup>3</sup> According to the 1850 census, 38% of the town’s population (20 individuals) was recorded as “black” or “mulatto.” While black settlers were never the majority of New Philadelphia’s population, the percentage of citizens recorded as black far exceeded the proportion of people of African descent in the State of Illinois, which hovered around 0.6%. The high concentration of free African Americans also contributed to New Philadelphia’s reported Underground Railroad activity as “virtually every 19th century black settlement across the country, urban or rural, offered some form of assistance or sanctuary to those escaping slavery.”<sup>4</sup> Oral tradition links Frank McWorter and other New Philadelphia residents with freedom-seeking activities, such as providing shelter and assistance for enslaved people who were traveling north to Canada. By 1865, when New Philadelphia’s overall population peaked at 160, 56 (35%) individuals were recorded as people of color. This population growth corresponds with post-Civil War migration of recently freed African Americans out of southern states.

New Philadelphia’s economic and population boom was short-lived. The Hannibal & Naples Railroad, completed in 1869, ran a mile north of New Philadelphia, cutting the community off from the newly established transportation corridor. Pike County in general experienced a rural decline starting in the 1870s as people moved farther west or to urban areas to chase economic opportunities. Demographics shifted further toward European Americans, with only 17% of the town’s 1880 population identifying as black. By the beginning of the 20th century, few structures and families remained in New Philadelphia. The town was essentially abandoned by the 1940s, with only the Burdick family, one of the earliest families to purchase property in New Philadelphia, living in a new house constructed within the original town boundaries.

3. James E. Davis, *Frontier Illinois* (Bloomington: Indiana University Press, 1998), 293.

4. Cheryl LaRoche, *Free Black Communities and the Underground Railroad: The Geography of Resistance* (Champaign: University of Illinois Press, 2013), 7.

A road sign first erected in the 1950s commemorated the site and McWorter’s accomplishments, but the town’s place in history was all but forgotten. One of Frank McWorter’s great-granddaughters, Thelma McWorter Kirkpatrick Wheaton, was motivated by her Fisk University sociology professor to undertake scholarly research about her ancestor’s life. Wheaton’s work as the family historian sparked Frank’s great-great-granddaughter Dr. Juliet E. K. Walker’s academic interest in his accomplishments. Dr. Walker’s research on Frank, published in 1983 as *Free Frank: A Black Pioneer in the Antebellum Frontier*, renewed interest in Frank McWorter’s accomplishments and framed New Philadelphia as an important historic site related to antebellum interracial communities, material culture, and social mobility. Efforts led by the New Philadelphia Association, a grassroots group started in 1996 to promote the story of Frank McWorter and the town he founded, broadened public interest in the site. Subsequent archeology field schools sponsored by the University of Illinois and the Archaeological Conservancy throughout the 2000s confirmed the national importance of New Philadelphia’s archeological resources. In 2009, the New Philadelphia Townsite was designated a national historic landmark, an honor that recognizes the site’s national significance and its exceptional value in illustrating part of the heritage of the United States.

## RESOURCE DESCRIPTION

### New Philadelphia Townsite

**Historic layout.** Frank McWorter purchased an 80-acre tract from the federal government in 1835. Of this parcel, he surveyed and platted 42 acres as the town of New Philadelphia. The town was divided into 144 lots measuring 60 feet by 120 feet. The town was laid out in a grid pattern, with most blocks containing eight lots. The intersection of Broad and Main Streets, located near the center of the town, became the commercial and population center. New Philadelphia was home to various enterprises alongside agriculture. Census records indicate that between 1850 and 1880 residents were employed as cabinetmakers, shoemakers, teachers, merchants, a wheelwright, a carpenter, a seamstress, and a physician.



Present-day view of New Philadelphia Townsite and gravel road.

The town also briefly served as a stagecoach stop.<sup>5</sup> No photographs or drawings of New Philadelphia during this period exist; however, oral histories document the town's historical appearance and period sources describe simple, log, domestic buildings that were common in mid-19th century Pike County.<sup>6</sup>

**Current appearance.** Today, no original structures dating from the period of significance remain at the New Philadelphia Townsite. There is little aboveground evidence to help orient visitors or to suggest the extent of development that once existed at the site. Professional land surveys, a pedestrian walkover survey, geophysical survey, and archeological investigation confirmed the town's location. High concentrations of archeological remains were identified in six town lots through systematic walkover surveys conducted as part of an intensive three-year archeological study conducted from 2004 to 2006 with support from the National Science Foundation. These efforts identified 17 significant archeological features including surviving foundations, wells, subsurface storage pits, and a lime slaking pit along with more than 65,000 artifacts dating from the mid-19th to early 20th centuries.<sup>7</sup>

5. Walker, *Free Frank*, 132-133, 135.

6. Charlotte King, "New Philadelphia Townsite," National Historic Landmark Nomination Form (New Philadelphia Association, Rockland, Maryland, January 16, 2009), 5.

7. King, "New Philadelphia Townsite," 12, 14.



Building foundation uncovered during archeological field school at New Philadelphia Townsite. (Photo courtesy of Paul Shackel)

Archeological features were bisected for investigation to keep the site's archeological integrity intact for future inquiry. The site's undisturbed features, stratigraphy, and artifact deposits hold the potential to yield additional information of major scientific importance. The Secretary of the Interior designated the site a national historic landmark in 2009. It is the only occupation site of the historic period to achieve national historic landmark status for archeological significance alone.<sup>8</sup>

Today, the abandoned townsite is covered by crop fields, native prairie grasses, introduced grasses, and stands of trees. A gravel road that follows the historic alignment of Broad Street and other streets leads through the townsite. A seasonal pond created in the 1950s covers portions of Block 11 and Block 20 in the southeast section of the site. Modern development at the site is limited to a gravel parking lot located directly off County Highway 2 and an informational kiosk installed in 2014 by the Illinois Rural Electric Cooperative. The kiosk provides protection for interpretive panels about Frank McWorter and New Philadelphia, as well as two plaques commemorating the site's 2009 designation as a national historic landmark and the Archaeological Conservancy's ownership of a portion of the site. Metal signposts associated with the augmented reality digital tour installed in 2015 follow a .25 mile mowed walking path through Blocks 2, 3, 8, and 9.

8. Vergil Noble, "New Philadelphia Townsite Provides Clues to the Past," *Exceptional Places* 4 (Fall 2009): 4.



Relocated log buildings, as seen from road.

**Noncontributing buildings**—The 2009 National Historic Landmark nomination lists six non-contributing buildings within the national historic landmark boundary. The buildings are located in two clusters.

*Relocated log buildings (3 noncontributing buildings):* A private landowner relocated three period log buildings to the New Philadelphia property circa 1998 to represent the modest type of structures that could have populated the town in the late-19th century. The buildings were modified to fit over exposed foundations and provide protection for surface archeological resources. Cabin 1, located on Block 3, Lot 7, dates to the 1850s and was transported from a site south and east of Rockport, Illinois. Cabin 2 was moved from a farm located southwest of New Philadelphia and sits on Block 3 between Lots 7 and 8. Cabin 3, located northeast of Cabin 1 and 2 on Block 3, Lot 8, is from a Pike County farm east of New Philadelphia. Cabins 2 and 3 have unknown dates of construction, but it is believed they date to the late-19th or early 20th century. While they are of historic age, the buildings are not historically associated with New Philadelphia and are in deteriorated condition. These structures do not contribute to the significance of the national historic landmark.



Burdick House, constructed circa 1939.

*Burdick House and associated outbuildings (3 noncontributing buildings):* The Burdick House sits on Block 19, Lots 3 and 4. Virgil Burdick, a descendant of early New Philadelphia settler Spalding Burdick, purchased the property in 1921 and constructed the two-story brick house circa 1939. The property and home remained in the Burdick family until 2005 when it was purchased by the New Philadelphia Association with assistance from State of Illinois appropriated funds. The house, which was renovated in 2005, is currently used as New Philadelphia Association guest housing. Two wood outbuildings constructed circa 1921 are also associated with the Burdick House: a barn located on Block 19, Lot 6, and a small chicken coop located on Block 19, Lot 3. In approximately 2010, the landowner reconstructed the barn using historic material after the building began to pose safety concerns.

**Archeological collection**—Artifacts collected from the New Philadelphia site during archeological field schools are owned by the Illinois State Museum and stored in the Illinois State Museum Research and Collection Center in Springfield, Illinois. The collection, which encompasses approximately 150 cubic feet of catalogued material, includes 18 curator boxes of documents related to site research and field school development, 16 curator boxes of artifacts collected during systematic site surface surveys, 116 curator boxes of artifacts unearthed during surveys, and several oversized items.

## Related Resources

Legislation authorizing the New Philadelphia special resource study required the National Park Service to evaluate the New Philadelphia archeological site and surrounding lands for possible inclusion in the national park system. Historic resources associated with New Philadelphia but located outside the national historic landmark boundary—the Frank McWorter house site; the Solomon McWorter house site, the integrated school site, and the McWorter Cemetery and Free Frank McWorter gravesite—therefore were also considered as part of this study. Additional research would be necessary to establish the national significance of these related resources and their appropriateness for inclusion within the New Philadelphia historic district or a potential future national park system unit.

**Frank McWorter house site and Solomon McWorter house site.** Frank McWorter first purchased property in Pike County, Illinois, in 1830. Frank and his son Solomon constructed houses on land directly north of what would become New Philadelphia's town boundaries. The sites of Frank and Solomon McWorters' houses lie to the north of County Road 2 and were not included in the national historic landmark boundary. These sites are privately owned and have not been systematically surveyed for archeological resources. Additional research would be required to understand the archeological potential of the homesites and their appropriateness for inclusion in a potential future NPS site.

**Integrated school site.** The first integrated community school to serve all of New Philadelphia's children, regardless of race, was constructed circa 1874 on Frank McWorter's property northeast of New Philadelphia's boundaries. The schoolhouse quickly became the community center, hosting social events and church services until its closure in 1947 when the county consolidated its rural schools. The building was demolished in 1949, but student reunions continued into the 1950s.<sup>9</sup>

9. Paul A. Shackel, *New Philadelphia: An Archaeology of Race in the Heartland* (Berkeley: University of California Press, 2011), 28.

The site of the 1874 schoolhouse sits north of County Road 2 outside the New Philadelphia town boundaries and was not included in the national historic landmark nomination. It has not been the subject of archeological survey. Additional archeological research would be required to identify the site of the integrated school, understand its archeological potential, and gauge its appropriateness for inclusion in a potential future NPS site.

**McWorter Cemetery and Free Frank McWorter gravesite.** Approximately 0.75 miles southeast of New Philadelphia near US Interstate 72 is the McWorter Cemetery, also known as the African American Cemetery or the Old Philadelphia Cemetery. Research conducted by local historians and genealogists, as well as a 2006 geophysical survey, identified approximately 24 gravesites dating from 1851 to 1950. The Free Frank Gravesite, located near the center of the cemetery, was listed in the National Register of Historic Places in 1988. The gravesite is recognized as having significance at the state level for its association with Frank, one of the earliest settlers in Pike County, Illinois, "whose life stands as a testament to the resilience of the human spirit in the face of oppression."<sup>10</sup> Other burials include Frank McWorter's wife Lucy; seven of their children; Martin Kimbo and Thomas Clark, soldiers who served during the Civil War as part of the United States Colored Infantry; and other late-19th-century New Philadelphia residents.<sup>11</sup>

10. Dr. Juliet E. K. Walker, "Free Frank McWorter Grave Site," National Register of Historic Places Inventory/Nomination Form University of Illinois and Urbana-Champaign, April 19, 1988, Section 8, 6.

11. Squire McWorter, Frank's grandson and a New Philadelphia resident, also served as part of the 38th Regiment of the United States Colored Infantry. His final resting place is unknown but he could also be buried in the African American Cemetery. Charlotte King, "Separated by Death and Color: The African American Cemetery of New Philadelphia, Illinois," *Historical Archaeology* 44, no. 1 (2010): 129, 133.

Many of the grave markers are damaged and inscriptions on most of the markers are illegible after years of weathering, but the site continues to be a valuable historic resource that provides insight into African-American culture on the frontier. The cemetery's location near the running water of Kiser Creek, unearthed animal bones, possible grave decorations, and broken glass vessels are rare evidence of West African burial customs being practiced and continuously developed by African Americans in the Midwest. These remnants of material culture support the notion of New Philadelphia's larger landscape being actively shaped by a heritage of African traditions and European influences.<sup>12</sup>

Certain members of the New Philadelphia Association expressed concern over publicizing the exact location of the cemetery because of fears of vandalism, but public comments collected during outreach activities identified a strong desire for potential visitors to access the site. The site sits outside the New Philadelphia town boundaries and was not included in the national historic landmark nomination. Ownership of the cemetery is not clear. During public outreach, the New Philadelphia Association informed the National Park Service that the Philadelphia Land Trust currently pays taxes on the land, but county records indicate that the cemetery is owned by Pike County. Additional title and property record research would be needed to confirm current ownership of the site.

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12. King, "Separated by Death and Color," 127-128, 131-134.

## CHAPTER 3: EVALUATION OF STUDY AREA FOR INCLUSION IN THE NATIONAL PARK SYSTEM

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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 *NPS Management Policies 2006* Section 1.3 *Criteria for Inclusion* (see appendix C of this study for reference) 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
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 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

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#### Criteria for Establishing National Significance

*NPS Management Policies 2006*, section 1.3.1, directs that proposed additions to the national park system must possess significance at the national level.

For cultural resources, national significance is evaluated by applying the NHL nomination criteria contained in 36 CFR Part 65.5.

The quality of national significance can be ascribed to districts, sites, buildings, structures, and objects that possess exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage. *NPS Management Policies 2006* provides that a resource will be considered nationally significant if it meets the following four criteria:

1. It is an outstanding example of a particular type of resource.
2. It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage.
3. It offers superlative opportunities for public enjoyment or scientific study.
4. It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of the resource.

In addition to the four standards, nationally significant cultural resources must also satisfy at least one of the six following national historic landmark criteria:<sup>13</sup>

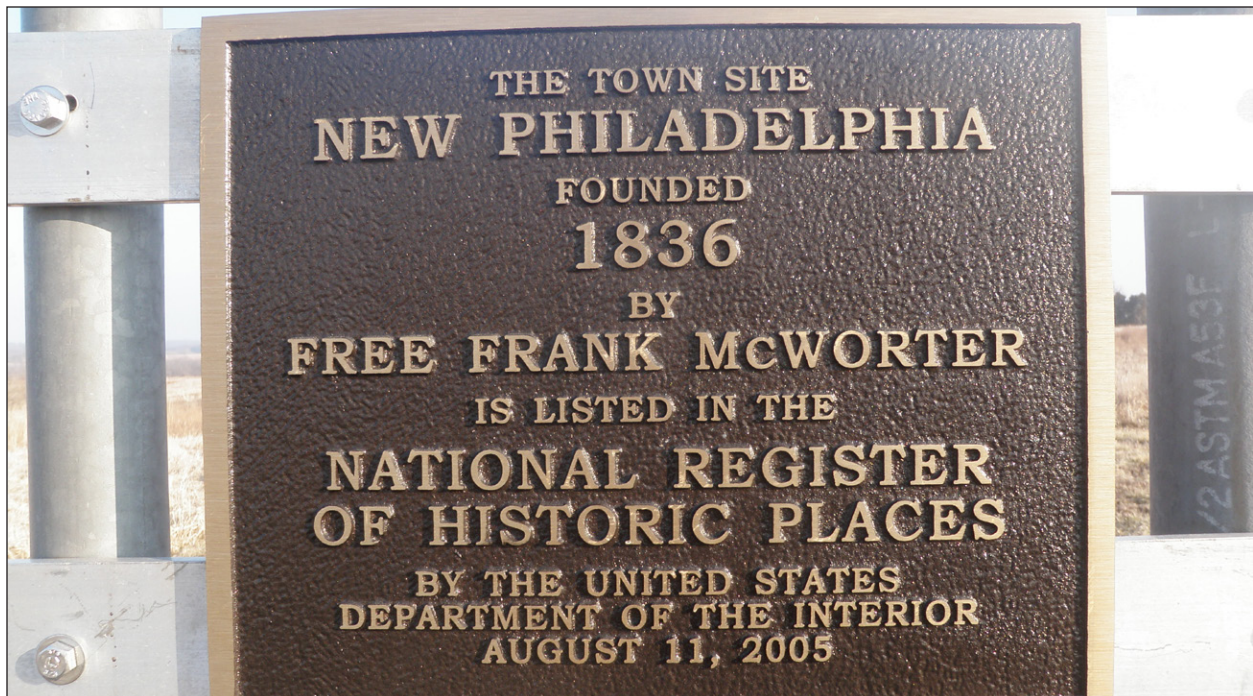
**Criterion 1:** that are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of the patterns may be gained; or

**Criterion 2:** that are associated importantly with the lives of persons nationally significant in the history of the United States; or

**Criterion 3:** that represent some great idea or ideals of the American people; or

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13. National Park Service, National Register of Historic Places *National Register Bulletin: How to Prepare National Historic Landmark Nominations*, <https://www.nps.gov/subjects/nationalhistoriclandmarks/nhl-bulletin.htm>.



A plaque recognizing New Philadelphia's placement on the National Register of Historic Places.

**Criterion 4:** that 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:** that are 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:** that 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.

### New Philadelphia Townsite Historic Designations

**Listing in the National Register of Historic Places.** In 2005, the New Philadelphia Townsite was listed as an archeological site in the National Register of Historic Places for having national significance under National Register Criterion D for archeology, ethnic heritage, and exploration/settlement. The national register documentation states that the archeological townsite “has the potential to provide evidence regarding lifeways and economic and social relationships of African Americans and European Americans in a town settlement on the frontier.”

**Designation as a National Historic Landmark.** The site's importance was again recognized when it was designated a national historic landmark on January, 16, 2009. National historic landmarks are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States.

The national historic landmark documentation states that the site qualifies for national historic landmark status under criterion 6 for its high potential to yield information of major scientific importance to our understandings of free, multiracial, rural communities, and the possibility the townsite possesses to affect theories, concepts, methods, and ideas in historical archeology to a major degree. It is the only occupation site of the historic period to achieve national historic landmark status for archeological significance alone. According to the national historic landmark nomination, the high archeological integrity of the entire town also presents the opportunity to address nationally significant questions about racial and spatial relationships outside the antebellum plantation setting, and about acculturation and identity formation in ways that can make a substantial addition to archeological literature. As a designated national historic landmark, it is well established that the study area possesses national significance. This designation satisfies the special resource study criterion for national significance.

New Philadelphia's national historic landmark documentation focuses on the site's archeological resources and research potential, but it is impossible to consider New Philadelphia's significance as a town without considering the national context in which it was founded and the remarkable story of its founder, Free Frank McWorter. During public outreach, some individuals expressed interest in the material culture of the site and artifacts unearthed during previous archeological fieldwork; but nearly all reported being moved by the story of an individual purchasing his freedom with money he earned while enslaved and establishing an integrated community on the Midwest frontier two decades before the Civil War. New Philadelphia provides the opportunity to tell nationally significant stories about African Americans' struggle for freedom and individuals overcoming great odds to build communities that created better economic and social opportunities for themselves and future generations.

## Historic Context

New Philadelphia was a part of the pre-Civil War phenomenon in which people of African descent established settlements in their quest for self-determination, a seemingly impossible task within the context of the larger society and American culture of the time. While slavery was largely prohibited in the north, the racism used to justify black enslavement pervaded the country. The 'free states' of the north were not free of racism and discrimination, as evidenced by the existence of oppressive black codes and black laws that attempted to circumscribe the citizenship rights of free people of color.<sup>14</sup> In 1817, Illinois passed a law requiring all free blacks moving into the state to provide a character reference that would be kept on record with the county clerk and to pay a \$1,000 security bond guaranteeing they would not become wards of the state. Nineteen of Frank's Pulaski County, Kentucky, neighbors and business associates signed a statement vouching for his good character, industriousness, and honesty, which ultimately allowed him to purchase land and settle in Pike County, Illinois.<sup>15</sup>

Frank McWorter was not unique in his desire to move his family to a free state and start a community that would allow for more economic opportunities and personal growth. Numerous free African-American communities dotted the states of Ohio, Indiana, and Illinois near the Midwest states' borders with the slave states of Kentucky and Missouri during the decades leading up to the Civil War. These towns were centers of early African-American economic, religious, and political development and showcased black agency during a time when free African Americans were striving towards an integrated society. It was in these communities that African Americans began organizing themselves on larger scales. Before the Civil War, most free African Americans lived in urban areas beset by rampant racism and limited social and economic opportunities. Rural farming allowed blacks to earn money through cash crops but could be a lonely and isolated existence.

14. Walker, *Free Frank*, 76-79; Shackel, *New Philadelphia*, 7.

15. Walker, *Free Frank*, 67-68.

Free black communities offered economic growth through farming or other professions, as well as social support that were invaluable leading up to and following the Civil War. The autonomy people of color demonstrated in these communities challenged ideas of black inferiority, defying notions that slavery was the only status fitting people of African descent. Independence was constructed by people of African descent through education, land ownership, and established small rural enclaves representing what has been termed as “geographies of resistance.”<sup>16</sup> These communities served as important spaces where free people of color could make lives for themselves and help to secure the freedom of others who remained enslaved through both legal and extralegal means. Many black community members risked their own freedom by participating in the Underground Railroad; assisting others with their fight for independence as a tool against the larger institution of slavery; and later volunteered for the Union army during the Civil War.

New Philadelphia was a rare example of a racially integrated settlement in the mid-19th century. While abolitionists pushed for the end of slavery, opinions differed on how blacks and whites should interact and the possibility of an integrated society. The American Colonization Society, founded in 1816 by white philanthropists, advocated for free African Americans to emigrate to Africa. The group, which saw colonization as a solution to growing racial tension, gained the support of numerous leading institutions, citizens, and religious organizations in New England and the Midwest.<sup>17</sup> New Philadelphia served as an important counter narrative to this popular notion of separate racial societies, showing that a community of blacks and whites living and farming side by side could exist in a time where Illinois was actively passing additional legislation that limited black settlement.<sup>18</sup> Although it was a free state, Illinois did not resist the 1850 Fugitive Slave Act, and, in 1853, passed “An Act to prevent Immigration of Free Negroes into this State.”

Following the Civil War, white soldiers returning to Illinois voted to add a state amendment to stop the immigration of African Americans into the state because of the fear of losing labor jobs to newly freed Southern blacks. New Philadelphia’s founding gives insight into the possibilities and realities of racial integration before the 20th-century Civil Rights movement. The town provides researchers an opportunity to explore the complexities of race and racism in the 19th century, and the site continues to offer archeological evidence of how race is reflected in material culture and historical context for contemporary social and political issues.<sup>19</sup>

Despite the historic role of these black and early integrated Midwestern communities, over time many of these settlements suffered from a lack of preservation and have virtually disappeared from both the physical landscape and dominant culture’s historical memory.<sup>20</sup> Often what remains of the cultural landscapes of these settlements reside mostly in the archeological record. New Philadelphia’s population dipped in the 1870s, and the town continued its decline into the 20th century with many residents either moving farther west or relocating to cities. After the Civil War, racism became more entrenched, economic opportunities moved farther west or to urban areas, and areas that were once places of refuge became increasingly less hospitable to African-American settlement. As a result, many residents were forced to make their lives elsewhere. Thus, New Philadelphia and similar towns today often lack the aboveground, structural resources that convey “integrity” as it is traditionally defined for historic districts.

While some may view the post-Civil War decline of New Philadelphia and other rural black settlements as failures, 19th-century, African-American farming communities acted as the basis for upward social mobility. As Frank McWorter personified, free blacks pursued the few economic opportunities available in the antebellum era, one of which was farming on the Midwest frontier where there were few white settlers to limit their advancement.

16. LaRoche, *Free Black Communities and the Underground Railroad*, v.

17. Felix Brenton, “American Colonization Society,” *BlackPast*. Org, accessed November 2016, <http://www.blackpast.org/aah/american-colonization-society-1816-1964>.

18. Shackel, *New Philadelphia*, 82-84.

19. Shackel, *New Philadelphia*, 89.

20. LaRoche, *Free Black Communities*, 16; Stephen A. Vincent, *Southern Seed, Northern Soil: African-American Farm Communities in the Midwest, 1765-1900* (Bloomington, Indiana University Press, 1999), 149.

The success of early generations allowed their descendants greater access to education and employment opportunities away from the family farm.<sup>21</sup> The decline of rural African-American communities can be partially attributed to the success of descendants, which led to greater opportunities for social and economic upward mobility.

Although no original aboveground resources remain at New Philadelphia to connect to the town's founding and Frank McWorter's life, Free Frank's legacy lives on through New Philadelphia's story of freedom and achievement. McWorter's success as an entrepreneur, accumulating wealth through saltpeter manufacturing and land acquisition in Kentucky and later moving to the Illinois frontier to found a town and continue land speculation, is a quintessential story of the success and social mobility possible in early America. By 1850, Frank and his sons owned more than 600 acres of land in Pike County valued at more than \$7,000.<sup>22</sup> He also holds the distinction of being a successful town founder during a boom-and-bust land speculation period. During the 1830s, many entrepreneurs platted communities in the hopes of selling lots at a profit. Hundreds of fledgling communities were surveyed and platted in Illinois during the 1830s. New Philadelphia was one of the few Illinois towns platted between 1834 and 1837 to outlast the economic downturn at the end of the decade and one of only two Pike County towns founded during this period by a sole proprietor to survive.<sup>23</sup>

Frank McWorter accomplished a rare feat for any man, one that becomes even more remarkable considering he first had to buy his own freedom and faced institutionalized racism and the threat of capture or potential re-enslavement by kidnappers even after moving to Illinois. He used entrepreneurial skills and land speculation techniques he learned during his time as an enslaved man in Kentucky to fund his move west and afford the official survey and registry of New Philadelphia.

New Philadelphia has the distinction of being the first recorded instance of a self-determined, spatially distinct place founded by a black man in antebellum America for the development of a town.<sup>24</sup>

Frank McWorter's business acumen and economic rise are notable, but his dedication to family and providing opportunities for his descendants may be an even stronger legacy. He initially pursued land speculation in Kentucky to buy his children's freedom, a goal he followed through on once reaching Illinois. He returned to Kentucky in 1835, when travel for free blacks was still risky and sometimes ended in re-enslavement, to free his son Solomon. He continued to save money from New Philadelphia throughout his life, ultimately using money from his estate to free additional family members. Between 1817 and 1857, McWorter purchased his own freedom and the release of 15 other family members spanning four generations for an estimated total of \$14,000.<sup>25</sup> This struggle toward freedom was taken up by his grandson Squire McWorter, a Civil War soldier who served in the 38th Regiment of the United States Colored Infantry.<sup>26</sup>

Education also offered free African Americans additional opportunity to raise their social status, demonstrate self-determination, and show self-sufficiency while facilitating integration.<sup>27</sup> Frank McWorter advocated for quality education for all free African Americans in New Philadelphia, donating a town parcel as the site of a seminary and school in 1848. While the school was never built, his descendants continued to pursue education as a way to improve their economic opportunities and lives. Frank's son Solomon donated a portion of his land as the site of New Philadelphia's first integrated schoolhouse. The school operated between 1872 and 1947 when Pike County consolidated its rural schools.

21. Nicholas Bergin, "Descendants recall Nebraska's once booming African American town of DeWitty," *Lincoln Journal Star*, 15 June, 2015, accessed November 2016, [http://journalstar.com/news/local/descendants-recall-nebraska-s-once-booming-african-american-town-of/article\\_75beb302-d53f-5e1d-86be-431e04ca9d37.html](http://journalstar.com/news/local/descendants-recall-nebraska-s-once-booming-african-american-town-of/article_75beb302-d53f-5e1d-86be-431e04ca9d37.html).

22. Walker, *Free Frank*, 156.

23. Walker, *Free Frank*, 122.

24. Walker, *Free Frank*, 116.

25. Walker, *Free Frank*, 156.

26. King, "Separated by Death and Color," 133.

27. Anna S. Agbe-Davies and Claire Fuller Martin, "'Demanding a Share of Public Regard': African American Education at New Philadelphia Illinois." *Transforming Anthropology* 21 no. 2 (2013): 103-121; Hilary J. Moss, *Schooling Citizens: The Struggle for African American Education in Antebellum America* (Chicago, University of Chicago Press, 2009).



Aerial view of New Philadelphia Townsite from the south.

Solomon was also an inventor, patenting a device that improved sorghum processing.<sup>28</sup> Of Solomon's eight children, the third generation of free McWorters, four earned college teaching certificates, continuing to farm and teach in rural Illinois and Missouri. John E. McWorter, following in his father Solomon's footsteps, patented three inventions related to aeroplanes during the 1910s and 1920s.<sup>29</sup> The next generation (Frank's great-grandchildren) included the first McWorter family college graduates. Three McWorters earned degrees in social work, including Thelma McWorter Kirkpatrick Wheaton, the family historian who shared Free Frank's story during her time at Fisk University, a Historic Black College and University (HBCU), in the late 1920s. Succeeding generations of Frank's descendants have gone on to earn masters and doctorate degrees and have been crucial in preserving Frank's story and the discussing the importance of New Philadelphia on a national stage.

### Integrity

New Philadelphia and similar historic black settlements often lack the aboveground, structural resources that convey "integrity" as it is traditionally defined for historic districts.

28. Solomon McWorter, *Evaporators for Sorghum and Other Sirups*, U. S. Patent 70,451, issued November 5, 1867.

29. Walker, *Free Frank*, 170.

Agricultural use since the early 20th century has disturbed the top 12–18 inches of earth at the New Philadelphia site, but no natural disturbances are known to have taken place, and stratigraphy and notable archeological features remain intact.<sup>30</sup> Concentrations of 19th- and 20th-century in situ artifacts related to the town's period of occupation continue to hold potential for additional archeological research and survey that could yield important information relating to early Illinois settlement and race relations within a 19th-century multiracial community.

### Conclusion: Summary of National Significance Evaluation

When evaluating national significance in congressionally authorized special resource studies, cultural resources are evaluated by applying the criteria for designation of national historic landmarks. The New Philadelphia Townsite, as a designated national historic landmark, is recognized as a nationally significant site, and retains its high archeological integrity. It therefore meets this criterion for new national park system units.

### EVALUATION OF SUITABILITY

#### Criteria for Establishing Suitability

To qualify as a potential addition to the national park system, an area that is nationally significant must also meet the criterion for suitability. NPS *Management Policies 2006*, section 1.3.2, states "an area is considered suitable for addition to the national park system if it represents a natural or cultural resources 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 on a case-by-case basis through the comparison of the proposed area to other similar resources within the national park system or other protected areas. The comparison should determine whether the study area would expand, enhance, or duplicate resources or visitor use opportunities found in other areas.

30. King, "New Philadelphia Townsite," 4.

## Type of Resource Represented by the Study Area

New Philadelphia is recognized as the first town platted by an African American. The town's period of significance is 1836, the year Frank McWorter platted and officially established the community, to 1930, when the last few families in the community sold their land. The site is associated with Western Migration; 19th century, racially integrated communities; and pre-Civil War free African-American rural settlement. Today, the site has limited aboveground features and is nationally significant for its archeological resources and future research potential associated with the community development and the intersection of material culture and racial identity of New Philadelphia's inhabitants.

## Theme or Context in Which the Study Area Fits

Under the Revisions of the National Park Service's Thematic Framework (1996), New Philadelphia is associated with the following theme and theme topics:

### Theme I. Peopling Places.

- Migration from Outside and Within
- Community and Neighborhood

In recent years, the National Park Service has worked to identify gaps in the cultural resources and values that are protected within the national park system. While the National Park Service cannot be expected to protect all important resources, it should strive to address missing stories and resources and work with other organizations towards a more fully representative system.

The 2017 NPS System Plan identifies the broad topic of African-American history as an underrepresented theme. "Immigration and migration shape American culture, economy, and society" was also listed as a gap in current NPS units. New Philadelphia fits these additional themes as the first known townsite platted by an African American and representative of the larger movement of Western migration by free African and European Americans during the antebellum era.

New Philadelphia Townsite can be connected to the National Park Service's Civil War to Civil Rights initiative for its place in African-American history and its evolving importance from the town's antebellum founding into the early 20th century. The program, originally created to commemorate the 150th anniversary of the Civil War, focuses on the historical context and contributions of the era from the beginning of the Civil War in 1861 to the passing of the Civil Rights Act in 1964. Issues associated with this time--and the story of New Philadelphia--remain relevant: legal and social equality, how divergent views were reconciled in a democratic society, and the new birth of freedom and the question of attaining equal rights for African Americans and all citizens.

NPS goals for the Civil War to Civil Rights initiative include "continu[ing] to broaden the stories of African Americans. . .to address these larger economic, social, and political issues and offer parallels to the issues of today" (Goal 1-Move Beyond the Battlefield) and "invest[ing] in the preservation of key landscapes, the interpretation of the important stories, the scholarship to support inclusive interpretation, and the technology necessary to widely share stories and its lessons worldwide" (Goal 5-Create a Lasting Legacy).<sup>31</sup>

In the years leading up to the National Park Service's 2016 Centennial, NPS employees and partners shared their vision for the national parks and collaborated to create an action plan to advance the stewardship and public enjoyment of parks. *A Call to Action: Preparing for a Second Century of Stewardship and Engagement*, outlined action items that would connect people to parks; advance the National Park Service's educational mission; preserve America's special places; and enhance professional and organizational excellence.

31. National Park Service, *Civil War to Civil Rights Commemoration Summary Report*, accessed April 2018, <https://www.nps.gov/civilwar/upload/CIVIL-WAR-TO-CIVIL-RIGHTS-SUMMARY-REPORT-1-v2.pdf>.

The action plan called for the National Park Service to “fill in the blanks” to identify sites that fully represent the nation’s cultural experience (Call to Action Item 1) and expand the meaning of parks to new audiences and provide an opportunity for communities to learn more about their heritage (Call to Action Item 3).<sup>32</sup> Preservation and interpretation of New Philadelphia, a historic site that tells the story of an antebellum integrated frontier community, would support the *Call to Action* initiative into the second century of the National Park Service.

### Comparative Analysis of Resources Similar to New Philadelphia Townsite

A comparative analysis is needed to determine if duplicate resource protection and visitor opportunities are already offered by NPS units or other land management entities. Protected sites that include archeology related to African-American history or represent 19th-century frontier settlement could include resources similar to those found in the New Philadelphia Townsite study area. Within the national park system, Homestead National Monument of America, Nicodemus National Historic Site, African Burial Ground National Monument, and Boston African American National Historic Site embody the same themes identified for the New Philadelphia Townsite. Protected Midwest archeological sites associated with 19th-century, African-American communities outside the national park system were also identified and considered for comparison. After conducting a comparative analysis of similar sites and resources, it appears that the New Philadelphia Townsite represents a resources type that is not comparably protected and the potential for visitor opportunities that are not currently offered by the National Park Service, other federal agencies, state or local governments, or nonprofits and therefore meets this requirement of the criterion for suitability.

### Similar Resources in the National Park System

**Homestead National Monument of America, Nebraska.** Homestead National Monument of America, created in 1936, commemorates the Homestead Act and its influence on American settlement. Signed by Abraham Lincoln in 1862 and implemented between 1863 and 1986, the Homestead Act allowed anyone who was or intended to become a United States citizen to claim 160 acres of surveyed government land on which to build a home and improve the land. The monument, located in Beatrice, Nebraska, encompasses the Freeman Homestead, a 160-acre claim established on the first day of the Homestead Act’s implementation, as well as a modern visitor center; the Freeman School, one of the longest continually operating one-room schoolhouses from the Homestead Era; and a representation of the tallgrass prairie ecosystem that once covered the Great Plains. Homestead National Monument of America highlights western migration that occurred during the second half of the 19th century. Under this act, women, African Americans, and immigrants were allowed to become landowners, giving these marginalized groups increased opportunities for social, economic, and political mobility.

Homestead National Monument of America represents 19th-century American westward migration and frontier settlement, themes that are also associated with the New Philadelphia Townsite. However, New Philadelphia represents a different era of settlement that predates the Homestead Act and represents community development that extends beyond individual homesteads. While the Homestead Act allowed African Americans additional opportunities for settlement and economic growth following the Civil War, New Philadelphia was built on free black, entrepreneurial activities occurring decades before widespread emancipation. Homestead National Monument protects fundamentally different historic resources than those found in the New Philadelphia Townsite study area.

**Nicodemus National Historic Site, Kansas.** Nicodemus National Historic Site was established to preserve and interpret the only remaining town west of the Mississippi River established by African Americans during the Reconstruction Era.

32. National Park Service, *A Call to Action: Preparing for a Second Century of Stewardship and Engagement*, accessed April 2018, [https://www.nps.gov/calltoaction/PDF/Directors\\_Call\\_to\\_Action\\_Report.pdf](https://www.nps.gov/calltoaction/PDF/Directors_Call_to_Action_Report.pdf).

The town was platted in 1877 by the Nicodemus Town Company as part of the homestead movement throughout the Great Plains. Nicodemus was marketed to African Americans as an agricultural settlement. The park consists of five historic structures that represent the foundation of the Nicodemus community: the 1939 Township Hall (self-government); the St. Francis Hotel/Switzer Residence (business and family life); the 1907 Old First Baptist Church; the 1897 African Methodist Episcopal Church (church), and School District Number 1 (education).

Many black communities similar to Nicodemus were established throughout the Midwest and Great Plains by Exodusters during Reconstruction, and their populations were bolstered by the Great Migration of the early 20th century, but New Philadelphia represents an earlier period of development and tells the story of a multicultural community started by a free black man thirty years before the Civil War. The Nicodemus community's extant structures offer a different visitor experience than that of the New Philadelphia archeological site and highlight a different period of African-American history. Both sites stand as reminders of the pioneering spirit of African Americans looking to create communities outside the racially oppressive South and the continued drive for freedom and self-reliance seen before and after the Civil War.

**African Burial Ground National Monument, New York City, New York.** The African Burial Ground National Monument protects the site of the earliest and largest known African-American cemetery. Historians estimate the burial ground was the site of 15,000–20,000 burials between 1690 and 1790; and the site is considered by historians to be one of the most important urban archeological finds in the United States. The monument, which is dedicated to Africans of early New York and Americans of African descent, recognizes the contributions of New York's early Africans, both free and enslaved, as well as late 20th-century efforts to preserve the site. It consists of an indoor visitor center and exhibitions, public art, and an outdoor memorial designed to reconnect ethnic African Americans to their ancestors' origins.

Both the African Burial Ground National Monument and New Philadelphia Townsite are archeological sites with strong ties to African-American history and potentially provide future researchers additional information about race relations, material culture, and multiracial communities. The monument was established to commemorate the sacred burial ground site, which includes more than 419 reinterred burials, and the swell in public interest and support that surrounded the burial ground's rediscovery. The New Philadelphia study area does not include burial sites, although McWorter Cemetery, located approximately .75 miles from the site and described as a related resource in chapter 2, could offer insight into the persistence of traditional African cultural practices in North America. The New Philadelphia study site primarily represents an established integrated frontier town, a site of life.

While the monument and the New Philadelphia Townsite represent different periods in history (18th century versus 19th century), different geographic context and settlement patterns (Africans transported to urban New York City as enslaved people versus free people of African descent establishing a Midwest farming community), and different archeological resources (burials versus artifacts that were used in everyday life), the sites together tell the story of Africans and African Americans finding their place in America.

**Boston African American National Historic Site.** The Boston African American National Historic Site, established by Congress in 1980, encompasses 15 historic sites related to African-American settlement on the North Slope of Boston's Beacon Hill. The sites, which are not owned by the National Park Service, include the homes and meeting places of African Americans active in the community and antislavery movement as well as the Robert Gould Shaw and 54th Regiment Memorial in Boston Common. The sites are connected via the 1.6-mile Black Heritage Trail, which is promoted alongside the Freedom Trail as "Boston's Trails to Freedom." Visitors to the national park system unit may follow the trail on self-guided or ranger-led tours, and visit the Museum of African American History, located in the African Meeting House and adjacent Abiel Smith School.

The site, trail, and individual walking tour stops tell the stories of the thriving North Slope community and its leading role in redefining freedom and promoting the abolition of slavery through activism and Underground Railroad activities.

Like New Philadelphia, the Boston African American National Historic Site interprets 19th century African-American communities. Both communities offered spaces for self-sufficiency and self-determination at a time when African Americans' freedom was threatened even in states without legalized slavery. Both the Boston site and New Philadelphia commemorate free African-American migration and the search for economic, social, and educational opportunities in the pursuit of equal rights before and during the Civil War. The sites primarily differ in resources and setting. Boston's North Slope represents free African-American community development in an urban, New England setting while the integrated town of New Philadelphia grew out of Frank McWorter's holdings on the Illinois frontier. The Museum of African American History, which includes a NPS visitor contact station and is a stop on the Black Heritage Trail, is located in the oldest extant African-American church building in the United States and the first public school and first school building intended for African Americans in the county. The trail meanders through 1820s brick townhouses associated with prominent African Americans and abolitionists, showcasing the urban and seemingly permanent nature of the historic structures. New Philadelphia relies on its archeological resources to convey the site's importance in terms of community building and inter-racial relationships in a rural setting.

### **Similar Resources outside the National Park System**

**Quindaro Townsite.** Quindaro, Kansas, located on the northern edge of modern-day Kansas City, was established as an abolitionist community in 1856 by the New England Immigrant Aid Company in an attempt to bolster Kansas's anti-slavery population during the tumultuous Bleeding Kansas era immediately preceding the Civil War. The town's location directly across the Missouri River from Missouri made it a logical Underground Railroad stop and bustling river port.

In the decade leading up to the Civil War, Quindaro became a legendary port for fugitive slaves and was an active stop on the western branch of the Underground Railroad. Quindaro Township's population, which was a mix of New England abolitionists, African Americans, and Wyandotte Indians who already lived in the area, soared to approximately 1,200 by 1858. However, with the economic downturn of the American Civil War and local railroads bypassing the community, the town's success was short-lived, and the company's town charter was withdrawn by the state legislature in 1862. Newly freed African Americans continued to settle near the town after the Civil War, leading to the founding of the Quindaro Freedman's School, the earliest school for African Americans west of the Mississippi River and the only school of its type in Kansas in 1867. The school, located within Quindaro, grew into a four-year institution, changing its name to Western University and becoming the first Historic Black College and University in the west. The university, which offered one of the nation's leading music programs during the early 20th century, closed its doors in 1943. The campus buildings have since been demolished.

The Quindaro site, which is fenced and consists of building ruins and a 19th-century cemetery, is now owned by the Unified Government of Wyandotte County and Kansas City, Kansas. The archeological site is considered a regional attraction for its historic and archeological significance, but physical access to the site and ruins is limited. Recognizing the townsite's historic and archeological significance, Congress designated it a National Commemorative Site in April 2019. Visitors can view the site from an overlook constructed by the city-county government in the 2000s, schedule an archeological site tour through the city-county government, or visit the nonprofit-owned Old Quindaro Museum located nearby. A John Brown statue that once stood at Western University is the centerpiece of a memorial plaza approximately 0.5 miles from the overlook that includes the Quindaro and Western University historical markers.

Both Quindaro and New Philadelphia allow for a look at African Americans and race relations on the frontier leading up to the Civil War.

While Quindaro's establishment and remaining archeological resources appear similar to those found at New Philadelphia, the town sites represent very different aspects of western settlement, making them each unique in terms of the period of significance and historic context. New Philadelphia was platted by a free African American working alone 20 years before the New England Immigrant Aid Company, an abolitionist organization composed of white men, chartered Quindaro in the aftermath of the Kansas-Nebraska Act. Frank McWorter, after buying independence for himself, his wife, and one of his children, established New Philadelphia as an interracial farming community that, like Quindaro two decades later, showed that an integrated community could exist. The towns were built in vastly different settings as well, with Quindaro being established in relation to a busy Missouri River port and New Philadelphia rising out of agriculture-based central Illinois. Both Quindaro's trade-based economy and New Philadelphia's small business center were ultimately impacted by railroads bypassing the communities but to different ends. Rural New Philadelphia's citizens moved away, leaving the town practically abandoned by the 1930s. Although it lost its town charter in 1862, Quindaro became home to a Historically Black University that was nationally recognized for its music program, and the former town was annexed by Kansas City, Kansas, in the early 20th century. Quindaro and New Philadelphia represent important milestones related to African-American settlement and integrated communities in the West, each with its own unique story to tell.

**Other midwestern African-American communities.** Numerous antebellum African-American or multicultural communities are currently protected by the US Forest Service (USFS) on national forest lands. Miller Grove, Illinois, an 1850s freed slave community—whose population came primarily from Tennessee—is part of Shawnee National Forest. Lick Creek, Indiana, was a rural community started in 1811 by a group of free blacks travelling from North Carolina with sympathetic Quakers. It is now part of the Hoosier National Forest. Poke Patch, Ohio, was founded in the 1820s by African-American farmers and iron workers and is included in Wayne National Forest.

These town sites, which are now primarily archeological sites consisting of cemeteries, building foundations, and historic road alignments, make up the US Forest Service's Freedom Trails Initiative, a collaboration between the three national forests to expand information on the Underground Railroad, backcountry routes through the Midwest, and associated community sites on land now administered by the US Forest Service. While these sites have been the subject of archeological investigations sponsored by the US Forest Service, other federal programs, and universities, they have limited onsite interpretation and are not actively promoted as public sites.

Other pre-Civil War free black and multicultural communities were found throughout the Midwest, clustered near borders with slave states and along Underground Railroad routes leading north. However, many of the settlements were abandoned during the late 19th and early 20th century, and townsites were buried under subsequent development or disturbed through agricultural practices. Some settlements still feature extant structures, most often community buildings such as churches or schools, but many of these have been remodeled over time and continued development and land use have damaged archeological resources. The New Philadelphia Townsite is unique in its level of integrity and completeness as an archeological site, as stated in the site's national historic landmark nomination.

### Visitor Opportunities

The New Philadelphia Townsite, protected by the New Philadelphia Association and Archaeological Conservancy, stands as one of the few archeological sites tied to an antebellum black settlement on the Midwest frontier. While the majority of New Philadelphia's historical resources remain underground, the site offers a unique opportunity for the public to learn about the field of archeology and the day-to-day lives of a diverse, rural Illinois community alongside researchers. New Philadelphia has the potential to share difficult aspects of history including the realities of a former slave living under Illinois's restrictive Black Codes preceding the Civil War and larger issues of race, freedom, and economic self-sufficiency on the Illinois frontier. The

University of Illinois and the Archaeological Conservancy have sponsored archeological field schools in which students had the opportunity to practice archeology through active research at New Philadelphia. Continued use as a field school could highlight the site's potential for revealing more information on race and material culture in a multicultural community, the aspect of the site called out as being nationally significant in its national historic landmark nomination. New Philadelphia represents the difficulties associated with the establishment and settlement of a frontier town immediately following Illinois's statehood in 1818. The story of determined individuals setting out to purchase land and become community founders was common throughout the Midwest. This aspect of the story is compelling and focuses on a different aspect of Free Frank McWorter's identity that lies outside the purview of settlement represented at the Homestead National Monument of America or Nicodemus National Historic Site.

Artifacts from New Philadelphia and the story of Frank McWorter's life are also featured in two Smithsonian museums. The recently opened National Museum of African American History and Culture includes a display dedicated to Frank McWorter and the founding of New Philadelphia and artifacts from the archeological site are displayed at the National Museum of American History. This recognition could raise national visibility of the settlement and may result in increased interest in the site and heritage tourism opportunities as more people become familiar with the unique story of New Philadelphia and its place in national history.

### **Conclusion: Summary of Suitability Evaluation**

The New Philadelphia Townsite represents an underrepresented resource within the park system. While other units of the national park system are dedicated to African-American history, no existing NPS site tells the story of a free black, agricultural settlement before the Civil War. Other antebellum African-American communities are found within national forests, but these archeological sites are seldom interpreted, and public access is severely limited.

The New Philadelphia site maintains excellent archeological integrity, allowing its resources to tell an often-forgotten story about free African-American settlement and life in an integrated agricultural community during the mid-19th century. Thus, the New Philadelphia site is considered suitable for inclusion in the national park system because of the lack of similar resources being protected and interpreted by the national park system or outside organizations and the site's potential for visitor opportunities.

## **EVALUATION OF FEASIBILITY**

### **Criteria for Establishing Feasibility**

To be feasible as a new unit or as an addition to an existing unit of the national park system, an area must be

1. of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries); and
2. capable of efficient administration by the National Park Service at a reasonable cost.

In evaluating feasibility, the National Park Service considers a variety of factors, including

- size;
- boundary configurations;
- access; planning and zoning;
- public enjoyment potential;
- costs associated with acquisition, development, and operation;
- current and potential threats to resources;
- existing degradation of resources;
- level of local and general support (including landowners); and
- economic/socioeconomic impacts of designation as part of a unit of the national park system.

This discussion considers the feasibility of adding the New Philadelphia Townsite as unit of the National Park Service. Feasibility factors are described in detail below.

**Size and boundary configuration.** Public Law 113-291, section 3051, directs the Secretary to prepare a special resource study that addresses the “New Philadelphia archeological site and surrounding land.” The study area, therefore, includes the 42-acre national historic landmark boundary and unspecified adjacent lands.

The national historic landmark boundary includes the entire platted townsite of New Philadelphia. This area has been determined nationally significant and possesses a high degree of integrity, as evidenced by its designation as a national historic landmark. The national historic landmark boundary would be adequate to ensure protection of resources associated with the historic town and to interpret the town in its entirety. However, if a new national park system unit were to be established, it may be advisable to consider including some lands outside the national historic landmark boundary to avoid impacts to the national historic landmark.

Section 110(f) of the National Historic Preservation Act requires that federal agencies exercise a higher standard of care when considering undertakings that may directly and adversely affect national historic landmarks. The law requires that agencies “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm” to national historic landmarks. Any new unit of the national park system would require some new visitor facilities and infrastructure—for instance, adequately sized parking, restroom facilities, and interpretive signage. Additionally, there would likely be a need for some administrative and operational facilities. Potentially, additional research could identify areas outside the national historic landmark boundary that would be suitable for facility development—either on adjacent lands or remote sites.

As discussed in chapter 2 and in the evaluation of national significance, sites that are related to New Philadelphia have been identified outside the national historic landmark boundary on adjacent lands.

These related sites include: Frank McWorter’s and his son Solomon McWorter’s home sites, the McWorter Cemetery and Frank McWorter gravesite, and the site of the integrated school. These areas have not been determined to be nationally significant and therefore are not appropriate for inclusion in the National Park Service at this time. If the New Philadelphia Townsite were established as a national park system unit, some of these areas could potentially be added at a later date through a boundary expansion. Any future addition would depend upon additional archeological research and analysis.

In summary, the study area is feasible under this factor. The national historic landmark boundary is of sufficient size and configuration to ensure resource protection; however, any proposal should consider the mandate to minimize harm to the national historic landmark. Therefore, consideration may be given to locating facilities outside the national historic landmark boundary. Related sites discussed above have not been determined nationally significant and therefore are not appropriate for inclusion at this time. Pending additional research, some of these areas could be appropriate for inclusion at a later date.

**Access.** New Philadelphia lies approximately 3 miles east of the Barry, Illinois, a small rural town (population approximately 1,300) with limited accommodations and services. Pittsfield, Illinois, (population approximately 4,500) is located roughly 15 miles southeast of the study area and offers more options for lodging and dining. The closest major airport is Lambert-St. Louis International Airport, roughly 113 miles away. See map 4 for regional details.

The existing road network provides access to the site, and this access could be improved. US Interstate 72/US Hwy 36, a major east-west thoroughfare, passes just south of New Philadelphia. The interstate connects Hannibal, Missouri, approximately 25 miles to the west, with the state capital of Springfield, Illinois, almost 80 miles to the east. Both cities are destinations for history enthusiasts; Hannibal was the boyhood home of Mark Twain, while Springfield is home to the Lincoln Home National Historic Site.

During public outreach efforts, many community members voiced that New Philadelphia had potential to attract tourists traveling this route—particularly if a new unit of the national park system were designated.

Interstate exits lead to Barry, Pittsfield, and other towns in the area. From these towns, access to New Philadelphia is by local highways, including County Road 2, which runs east-west along the northern edge of the townsite. At present, wayfinding is limited. A few small directional signs along County Road 2 point the way to New Philadelphia. These signs were established through the efforts of the New Philadelphia Association and other partners. Currently, the site does not have an established address, which complicates wayfinding.

A small gravel parking area, with space for a few vehicles, has been constructed near the intersection of County Road 2 and Broad Street, adjacent to the informational kiosk and self-guided trail. From this intersection, Broad Street runs south and east through the historic site to a private residence. It does not connect to US Interstate 72 (map 5).

There is no public transportation in the immediate area. As a rural highway, County Road 2 does not have sidewalks, shoulders, or bike lanes to facilitate travel on foot or by bike. Vehicular traffic is light, however. If a new unit of the national park system were to be established, there would be a need for some additional transportation infrastructure, such as signage from major highways, adequate on-site parking, and a site address.

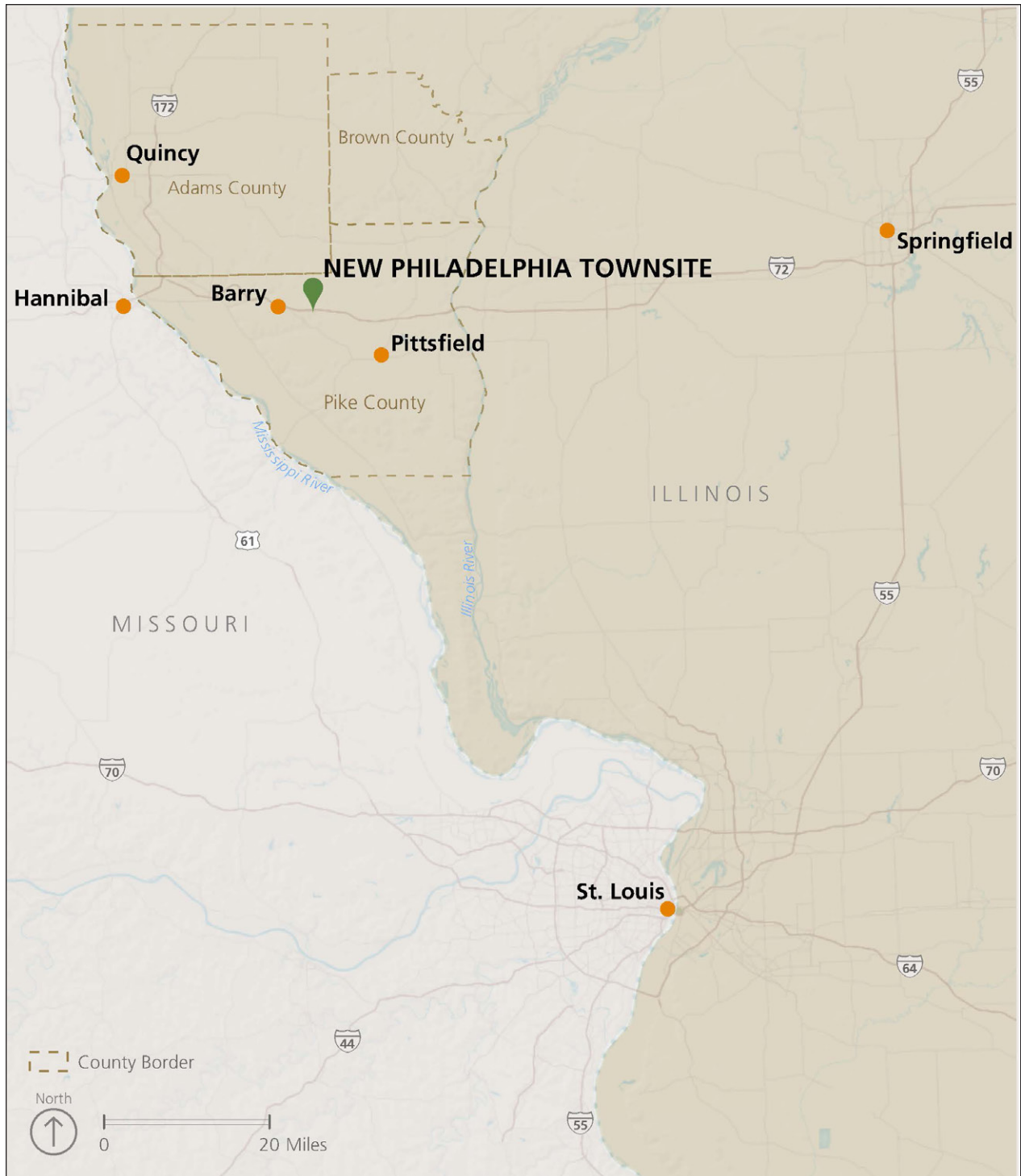
The National Park Service concludes there is sufficient access by personal vehicle to the study area. Although New Philadelphia is located 80 miles from a major city or other National Park Service unit, the existing road network provides easy personal vehicle access, and this access could be improved with additional public transportation, bike lanes, or sidewalks if the study areas were to become a new unit of the national park system. Current access is adequate to support visitor use and administration of the site if it becomes a unit of the national park system.

**Land ownership patterns.** Land within and surrounding the study area is primarily rural and agricultural; some of it is actively farmed. Two nonprofit organizations—the New Philadelphia Association and the Archaeological Conservancy—own more than half of the property within the 42-acre national historic landmark boundary. The remainder of the study area and lands adjacent to the NHL boundary are privately owned (see map 3). All landowners within the national historic landmark boundary expressed support for designation of a new national park system unit and stated a willingness to sell or donate property to that cause (discussed below). Current land ownership patterns support establishment of a new National Park Service unit.

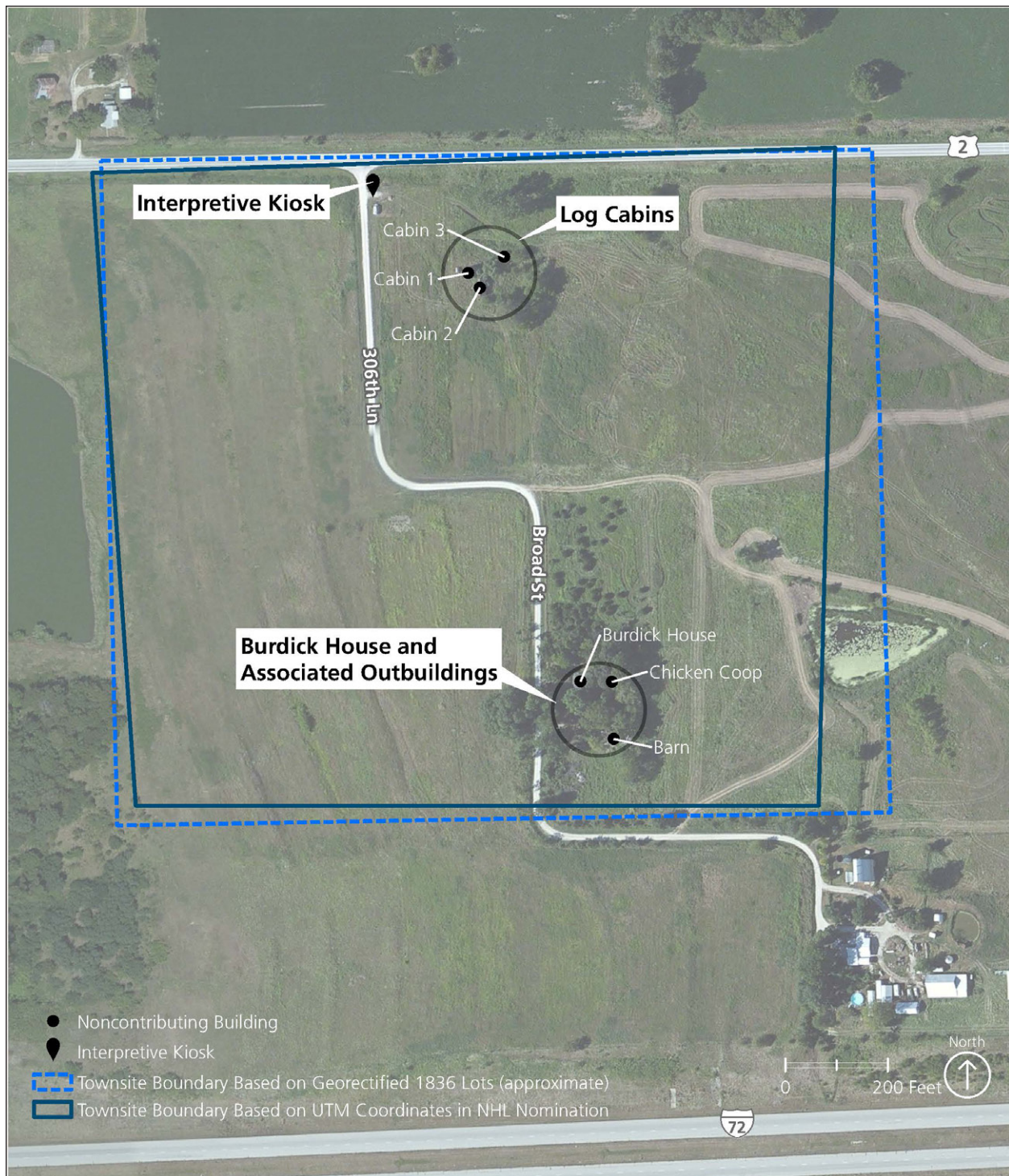
**Level of local and general support (including landowners).** As part of the public outreach activities connected with the New Philadelphia Townsite study, the National Park Service held a public informational meeting on May 11, 2016, in Pittsfield, Illinois, following a day-long site visit. This meeting provided opportunities for the team to inform the public about the special resource study process and gauge community support for a potential new national park system unit. Attendance at the meeting included elected officials or their representatives, members of the local Pike County community, as well as members of partner organizations and descendants of Frank McWorter that traveled from as far away as Maryland, Oklahoma, and Texas. Eighty-eight people signed in although attendance was believed to number more than one hundred.

Most meeting attendees overwhelmingly supported NPS management to preserve and interpret the resources of the New Philadelphia Townsite for the long-term. Many commented that the National Park Service would be an ideal entity for designing and implementing additional interpretive material and educational programming to share and explain the multiple stories of New Philadelphia and the town's founder "Free Frank." Many participants also expressed their belief that a new unit of the national park system would benefit the local economy. This perception contributed to the high level of local support for NPS management.

All landowners in and adjacent to New Philadelphia Townsite were sent a letter notifying them of the special resource study and inviting them to attend the site visit and public meeting.



**Map 4. New Philadelphia Townsite with Regional Context.**



**Map 5.** New Philadelphia Townsite with Existing Conditions.

All property owners within the 42-acre national historic landmark boundary fully supported New Philadelphia becoming a unit of the national park system and all expressed willingness to sell or donate their land to the agency. The New Philadelphia Association sent a letter stating their intention to donate their land if the site was authorized for inclusion. Adjacent landowners also supported the 42-acre site becoming a national park system unit. However, one adjacent landowner, whose property includes a related site, expressed concern that the federal government might assume ownership of his property through eminent domain. That landowner strongly expressed that he had no interest in selling his land.

Local, state, and federal elected officials expressed support for the site. US Representatives Darin LaHood (IL 18th District) and Cheri Bustos (IL 17th District) sent letters of support. Congressman LaHood also sent a representative to the site visit and informational meeting to voice his support of the special resource study and the site's potential inclusion in the national park system. Many state officials have visited the site and vocally pledged their support for long-term protection and inclusion in the national park system.

Comments collected during the site visit, at the public informational meeting, and through the project's NPS Planning, Environment and Public Comment (PEPC) website echoed this sentiment. No one, online or in person, opposed NPS management or suggested another organization should preserve or interpret the site. There is sufficient local support for the inclusion of the study area within the national park system. Therefore, the addition of the New Philadelphia Townsite would be feasible under this factor.

**Public enjoyment potential.** A reconnaissance survey completed by the National Park Service in 2012 questioned the feasibility of adding the New Philadelphia Townsite to the national park system because of the site's limited aboveground resources and their unknown potential for public enjoyment. During public outreach activities conducted as part of this study, commenters indicated there was great interest in visitor opportunities currently offered at the site, as well as adding opportunities in the future.

New Philadelphia Association created a 0.25-mile walking trail through a portion of the national historic landmark and a virtual augmented reality tours of the site debuted in 2015. The virtual tour, funded in part by a NPS National Underground Railroad Network to Freedom grant, allows visitors to use their smartphones or other electronic devices while on the walking trail to see projections of what the town of New Philadelphia may have looked like at its peak during the 1860s. Locals also voiced appreciation for the green space, bird-watching opportunities, and informational kiosk that are part of the site's current visitor experience. There is potential to expand and enhance all of the current visitor experiences and to create new opportunities for public enjoyment tied to the walking trail, self-guided augmented reality tour, and the site's natural resources.

While the site's nationally significant archeological resources are primarily subsurface features, these and other resources found at New Philadelphia Townsite have the potential for public enjoyment and interpretation. Many commenters expressed interest in seeing artifacts unearthed during past archeological excavations and simultaneously learning more about the site and the field of historic archeology through interpretation, educational programs, or static displays. The site's research potential lends itself well to continued archeological fieldwork conducted by universities, archeological nonprofits, or as part of community youth programs. Findings from future field surveys and excavations may provide additional information about life at New Philadelphia that could be used to craft additional visitor opportunities and expand the site's interpretation potential.

The New Philadelphia Townsite holds interpretive potential as an archeological site, but the public repeatedly reminded the National Park Service that it was the *stories* of Free Frank McWorter, the integrated community of New Philadelphia, and the struggles for freedom and acceptance faced by African Americans that they considered to hold the most potential for public enrichment.

While the story of a formerly enslaved man platting a town on the Illinois frontier in 1836 can be told in numerous venues employing a variety of techniques, New Philadelphia Townsite offers the public the opportunity to stand on the property purchased by McWorter and survey the same landscape that shaped New Philadelphia as a small, integrated farm community in the 19th century. What is unclear is whether the benefits associated with NPS site management and interpretation of those stories would justify the costs of development and long-term management. This also pertains to evaluation in the next criterion, need for NPS management.

Many visitors to the site commented on the importance of New Philadelphia's rural, agricultural setting, and remarked that unobstructed views across the open, largely undeveloped landscape provide a glimpse into the 19th-century Illinois frontier. While commenters' suggestions varied about what visitor facilities and experiences could be offered at the site, all acknowledged the site's current power as an archeological site within a rural landscape. Comments suggested the importance of preserving the site's rural character as an important aspect of the visitor experience. These concerns would suggest a modest approach to any future site development. Furthermore, expanding guided tours and formal educational programs could help interpret the site's surrounding landscape.

The site's undeveloped character allows for New Philadelphia Association, the Archaeological Conservancy, and potentially other partners, to explore creative methods to convey the site's history and importance without substantial development. Commenters suggested projecting the historical plat map over the now-vacant town site, constructing "ghost structures" to stand in the former locations of select structures and businesses and using archeological evidence to construct new structures to represent select 19th-century buildings. It should be noted that most of these suggested reconstruction activities would not be permitted under NPS ownership per the agency's management policies; management by other entities would generally allow more flexibility in approach.

Commenters also suggested exhibiting artifacts recovered from the site or maintaining open excavation areas to reveal resources in their current state and demonstrate archeological practice and methods. New technologies and additional research at the site can also expand public enjoyment opportunities and help bring the stories of New Philadelphia to life for visitors.

Currently, three log cabins located in the northern portion of the study area are protecting the few extant foundations associated with New Philadelphia buildings. The cabins, which are considered noncontributing structures, are some of the only above-ground features at the site; while they are the main visual feature from the road and pique potential visitors' interest in the site, they represent potential challenges to accurately interpreting New Philadelphia's history and the town's development. The historic age of the structures and their worn appearance lead many visitors to assume that they are original to the site and/or associated with Frank McWorter and African American settlement at New Philadelphia. Future interpreters need to consider this confusion when discussing the structures' relatively recent relocation to the site to protect in situ archeological resources. It may also complicate the National Park Service's approach to future treatment of the buildings, as individuals may object to having the cabins significantly altered or removed, even though they are relatively recent additions to the landscape and are not historically associated with New Philadelphia. If the cabins were removed, it may be difficult to convey the physical appearance of the historic site without replica or ghost structures. These types of reconstructions are generally not permitted under NPS management policies and, if some representative structure was constructed to provide a visual aid, it would increase the maintenance costs associated with the site.

Central Illinois is embracing heritage tourism, including promoting Abraham Lincoln's legacy in the state through the Abraham Lincoln National Heritage Area and Lincoln Home National Historic Site in Springfield. Interstate 72 / US Hwy 36 connects Springfield with Hannibal, Missouri, a destination associated with author and humorist Mark Twain. This highway is viewed as an important corridor for heritage tourists. Tourists traveling this route may add New Philadelphia to their itineraries as well (also see "Access").

## Threats to resources and degradation.

**Threats to resources**—The majority of resources within the study area are archeological sites and cultural landscape features that contribute to New Philadelphia’s rural setting and agricultural feeling. In situ subsurface archeological resources are offered a level of protection because they have a limited aboveground profile. Unexcavated sites are vulnerable to ground disturbances connected to construction or excavation activities, as well as natural processes including bioturbation, cryoturbation, and erosion linked to weather events. Visitors may also damage archeological sites and resources, whether intentionally, unintentionally, or in the form of artifact collecting and looting.

The few existing foundations at the site are currently covered by log cabins that were relocated to the study area to protect surface archeological resources. These noncontributing buildings have been brought to the New Philadelphia and reconfigured to help preserve in situ resources, but the cabins’ deteriorated condition raises questions of their long-term effectiveness. If the relocated cabins were removed, the National Park Service would need to consider installing alternative methods for protecting the exposed foundations from natural and potential visitor disturbances. If the cabins were allowed to stay in their current locations, vandals could target them and the study area’s other historic, noncontributing structures, as well as any wayfinding aids, interpretive signs, and other visitor facilities added to the site considering the site’s remote, rural location. New Philadelphia Association representatives and local residents have stated that this has not been an issue in the past, but an increase in activity at the site may bring additional unwanted attention as well.

**Future development**—Whether on property within the national historic landmark boundary or on adjacent lands, future development may also pose a threat to the site’s archeological resources and cultural landscape. During the May 2016 site visit, one advisor noted that private lands could be sold and redeveloped for industrial agriculture—potentially for a large-scale livestock operation.

This type of development could contribute noise, vehicle traffic, and smells that would negatively affect visitor experiences, as well as diminish the sweeping views across open, largely undeveloped land that the site currently offers. At the time of the study, however, the National Park Service was not aware of specific development proposals within or near the study area. Any ground disturbances associated with the construction of additional infrastructure or visitor facilities within the New Philadelphia town site have the potential to impact archeological resources associated with the town’s national significance. Additional archeological survey, careful site planning, and compliance under the National Historic Preservation Act would be necessary to minimize any future impacts from projects undertaken by the National Park Service or projects connected to federal funding.

At present, threats to the study area’s natural resources are unknown. To prepare for future planning efforts and resource management, the New Philadelphia Association hired consultants to inventory the McWorter Cemetery and identify any threatened and endangered plant and animal species. Reportedly, these studies did not discover any species of concern or identify direct or perceived threats to wildlife or vegetation. If the New Philadelphia Townsite were established as a national park system unit, then additional species inventory and research would be necessary to better understand the condition of its natural resources.

**Degradation**—As an archeological site, New Philadelphia retains excellent integrity and shows few signs of resource degradation. Twentieth-century agricultural use of land within the national historic landmark boundary disturbed the upper 12 to 18 inches of soil, but archeological surveys conducted during the 2000s confirmed that these past activities did little to affect the site’s subsurface resources. Recent archeological surveys and field schools bisected known archeological features to preserve the integrity of the overall site for future inquiry. There is no additional degradation attributed to site’s current use as an archeological preserve or visitation patterns.

Six noncontributing buildings are located within the New Philadelphia Townsite national historic landmark boundary. The three 19th-century log cabins currently protecting exposed archeological ruins are in deteriorated condition and may pose visitor safety issues. The circa 1939 Burdick House is minimally used, but the New Philadelphia Association has made modest improvements to the structure, including its aging electrical and plumbing systems. The Burdick barn and chicken coop were recently reconstructed using early 20th-century building materials and appear to be in good condition. If the New Philadelphia Townsite were established as a national park system unit, the National Park Service would assume management responsibility for the site's noncontributing structures. Any degradation associated with the noncontributing structures would not detract from the condition of the site's archeological resources, for which the site is nationally significant; however, due to public safety concerns, the degradation of the noncontributing structures could incur additional costs to NPS for stabilization or removal. In addition to direct costs associated with removal or relocation of the three 19th-century log cabins, those actions may expose archeological resources (historic foundations) that the structures currently protect. Should the noncontributing structures be removed, investment into fencing and possible coverage of the historic foundations may be required to prevent degradation of those resources and support visitor safety.

#### **Economic and socioeconomic impacts.**

During the informational meeting and other outreach activities that were conducted as part of this study (see chapter 5), local community members expressed their hope and belief that a new unit of the national park system would become a significant economic driver for the area. The economic benefits of national parks are well established. Nationwide, visitors to NPS lands purchase goods and services in local gateway regions and these expenditures generate and support economic activity within those local economies. Such visitor spending is far-reaching, directly affecting sectors such as lodging, restaurants, retail, recreation industries, and transportation. According to the 2015 *NPS Visitor Spending Effects Report*, park visitors spent an estimated \$16.9 billion in local gateway regions while visiting NPS lands across the country in 2015.

These expenditures supported an estimated 295,000 jobs, \$11.1 billion in labor income, and \$32 billion in economic output in the national economy.<sup>33</sup>

At present, however, the socioeconomic impact of a new unit of the national park system on the local area is uncertain but is projected to be modest. Social and economic impacts of national park system unit designation would vary, depending on the size and scope of the new park, management approach, staffing levels, and especially visitation. Any impacts would accumulate over time as a new unit became better associated with the national park system. Socioeconomic impacts correlate directly with the number of visitors to a site.

Currently, the New Philadelphia Townsite receives comparatively few visitors outside of special events. If a new national park system unit were established, general visitation to the site would likely rise; however, the level to which New Philadelphia would become a visitor attraction is unknown. In comparison to most other NPS units, it is likely that visitation would remain low due to the site's small size, rural setting, and distance from urban environments and large tourist attractions. The National Park Service reviewed visitation records for NPS historical units located a comparable distance from metropolitan areas. According to this analysis, estimated visitation could range widely, from 3,100 per year at Nicodemus National Historical Site in western Kansas to 60,000 people at Homestead National Monument of America in Nebraska.<sup>34</sup> It is assumed, given the factors noted above, that New Philadelphia visitation as a potential new unit of the national park system would be at the low end of that range.

Traffic counters installed in June 2016 at the New Philadelphia site recorded approximately 3,700 vehicles traveled along Broad Street between June 2016 and September 2016.

33. National Park Service Social Science, "Visitor Spending Effects," 2015, <https://www.nps.gov/subjects/socialscience/vse.htm>.

34. Comparison parks for visitation estimates are Thomas Stone National Historic Site, Nicodemus National Historic Site, Knife River Indian Villages National Historic Site, and Homestead National Monument of America.

Using this measure and assuming all recorded vehicles were unique and visiting the historic site, New Philadelphia's estimated visitation for the four month time period could range from 7,500 to 11,000 individuals. However, the traffic counters do not factor in local traffic using Broad Street for egress, and these estimates may be artificially inflated as a result. Estimating the sustained annual visitation to the site with a single or partial year of data is difficult and any future visitation estimates should take into account the rest of the calendar year, which was not measured by these counters, and the boost that would likely accompany designation as a National Park Service unit.

Designation of a new unit would likely result in some increased spending in local restaurants, hotels, and retail establishments, and these purchases would generate tax revenues. The economic impact of this visitor spending in small towns, such as Barry and Pittsfield, could be noticeable but may not be especially dramatic. Visitation would likely vary over the course of a year, and socioeconomic impacts would therefore be stronger during peak visitation.

In the 2015 *NPS Visitor Spending Effects Report*, the National Park Service estimates the economic "value added" of each unit of the national park system to the economy of the surrounding local area that results from non-local visitor expenditures.<sup>35</sup> Value added refers to the incremental, or net, increase in economic output that can be attributed to a particular activity or the price of its final output minus the cost of its inputs. (The sum total of value added in a particular economy equals its gross domestic product.) Estimates of these impacts for several NPS units that are roughly comparable in terms of location and community size are compiled to assess the anticipated economic value added by visitation to the New Philadelphia Townsite. The annual value added for these sites in 2015 ranged from \$91,000 to \$1.4 million.<sup>36</sup>

Typically, the establishment of a new national park system unit would also involve the construction of some new visitor and administrative facilities. These construction activities would provide a modest and temporary economic benefit in the form of worker spending or local jobs. At New Philadelphia, however, facility construction would likely be minimal in comparison to other NPS units. A new park would also require staff to operate facilities and care for the grounds. Presumably, some employees could be sourced from the local area. Again, job creation would likely be minimal in comparison to larger units of the national park system.

While the impact on the local economy is uncertain, socioeconomic factors would not preclude the designation of a new unit of the national park system. Designation is not expected to result in negative economic impacts, as minimal land and other resources would be diverted from their existing uses to establish the site as a unit of the national park system. The site would likely generate a small economic benefit in accommodations, food services, and retail trade used by site visitors. The overall socioeconomic impact of designation to nearby communities would likely be slight.

**Costs associated with acquisition, development, and operations.** In a special resource study, analysis of feasibility provides an initial opportunity to understand the magnitude of the costs required for acquiring park lands and establishing park operations. The full costs to acquire and sustain the New Philadelphia Townsite as a unit of the national park system are not known at present and would be affected by the level of visitation, requirements for resource preservation, and the desired level of facility development. Projects that would be both technically possible and desirable to accomplish for the new park may not be feasible in light of current budgetary constraints and competing needs in other units of the national park system.

**Acquisition**—Costs for land acquisition would vary depending upon the final property boundary configuration and the level of existing development on the site. National Park Service acquisition of privately owned properties can occur only by donation or from a willing seller for the appraised value.

35. National Park Service Social Science, "Visitor Spending Effect," 2015, <https://www.nps.gov/subjects/socialscience/vse.htm>.

36. Comparison parks for economic impacts Thomas Stone National Historic Site, Nicodemus National Historic Site, Knife River Indian Villages National Historic Site, and Homestead National Monument of America.

The New Philadelphia Association and other property owners have expressed a willingness to sell or donate their properties to the National Park Service. Assuming that all of the 42-acre national historic landmark property is purchased rather than donated, the acquisition cost would be approximately \$250,000, based on initial analysis of local property values. Acquiring a few additional acres to provide space for a small parking lot and other facilities adjacent to the New Philadelphia Townsite National Historic Landmark may raise the cost to approximately \$300,000. Note that these cost figures are rough estimates based on comparable Pike County, Illinois, parcels and 2016 property values.

***Development (one-time facility development costs)***—Development costs of national park system additions vary widely, depending on existing conditions and facilities and the types of conditions and facilities desired. New national park system units and additions frequently require investment of time and money to inventory and document resources in the unit, develop management or treatment plans for those resources, develop educational and interpretive materials, and develop and improve facilities for visitors and park operations, including facilities that would meet legislative requirements for accessibility.

Considering the nature of the archeological site and visible resources, the study area's rural location and the relatively low anticipated visitation, facility improvements would likely be modest but still may take an extended period of time to fund and implement. Any NPS development or infrastructure would need to be carefully sited and designed, with the goal of preserving archeological resources and the viewshed. Considering the level of visitor facilities the public expects to have access to at units of the national park system, minimum new development at the New Philadelphia site would likely include restrooms (e.g., vault toilet); improvements to ensure adequate site access, such as accessible walkways and a parking area of sufficient size to accommodate expected visitation; and additional visitor orientation and interpretive materials. Parking for oversized vehicles such as buses operated by schools or organized tour groups would also be needed.

Additional resource protection and visitor safety improvements such as a boundary fence, fencing/covering for exposed historic foundations, redesigned interpretive walking trails, interpretive panels, directional signage, and site furnishings such as outdoor seating and drinking fountains would also be considered to meet public expectations associated with the typical experience at a national park system unit. A new or redesigned sheltered gathering space may also be developed as well as a new enclosed structure to serve as a visitor contact station. The cost of these developments would vary with the level of implementation. Because of current budget shortfalls and a servicewide effort to reduce spending on the construction, operation, and maintenance of new facilities, it is unlikely that the National Park Service would be able to implement many of these improvements in the foreseeable future solely with internal resources. However, the National Park Service could pursue implementation of these types of improvements through partnership efforts.

Development costs would also vary depending on the treatment of noncontributing structures. For example, the rehabilitation and reuse of the historic but noncontributing Burdick house would be costly. A 2012 contractor estimate received by the New Philadelphia Association for converting the structure into a research and archeological field school bunkhouse was approximately \$300,000. NPS staff who conducted a site visit, however, predicted that any project to convert the house into an NPS visitor facility could cost many times that amount, considering the work that would be necessary to update internal systems, abate potentially hazardous materials, and meet federal accessibility and other standards. Alternately, this house and other noncontributing structures could be preserved in their current state for considerably less money; cost estimations for mothballing a building are assumed to be 15% of the cost to rehabilitate it. While mothballing may be the cheapest preservation option available to the National Park System, the house would still contribute to maintenance tasks and the vacant structure could become a target for vandalism if there is no regular NPS staff presence at the site. The building could also be removed from the property through relocation or demolition.

Relocation would be dependent on finding an interested party and appropriate new location. Costs associated with this preservation option could vary widely depending on the condition of the house, the distance to its new location, and other factors. Demolition of the house is estimated to be a one-time cost of approximately \$80,000 including historic documentation, compliance, and environmental mitigation. If the Burdick House was not removed from the study area, either through relocation or demolition, additional recurring costs for its operation and maintenance as a visitor facility or its preservation as a mothballed structure would also need to be considered. Treatment options for the Burdick House and estimated costs are discussed in more detail in chapter 4 of this study.

As mentioned in the feasibility evaluation, in addition to direct costs associated with the potential removal or relocation of the three 19th-century log cabins, those actions may expose archeological resources (historic foundations) that the structures currently protect. Should the noncontributing structures be removed, investment in alternative resource protection measures, which may include fencing, possible coverage of the historic foundations, maintenance activities to slow erosion or other natural disturbances, and/or additional law enforcement presence, may be required to preserve those resources.

Historical and archeological research and documentation meeting NPS cultural resource standards would likely occur in connection with site development, and these activities would incur additional costs. Research would help expand understanding and knowledge of New Philadelphia, for instance, by locating, protecting, and preserving additional artifacts and features that support its historical significance and would be necessary before any ground-disturbing activities associated with NPS projects could begin. Additional preservation measures associated with in situ archeological resources, visible foundations, noncontributing structures on the site, and the New Philadelphia site as a whole would also incur costs in the forms of staff time, one-time and cyclical maintenance activities, and construction activities of any protective installations.

Collectively, research and preservation activities could represent a significant cost associated with establishment of a new national park system unit.

**Operations**—National park system unit operating costs vary widely, depending on the types and quantities of resources managed, the number of visitors, the level of programs offered, safety and security issues, and many other factors.

At a minimum, the operating costs of New Philadelphia Townsite would include grounds maintenance, utilities, communications, and other miscellaneous expenses. Operating costs would also include staffing. Personnel would be required to design and deliver programming (e.g., personal interpretation, exhibits, special events), maintain facilities and grounds, perform administrative functions (budget, management, planning and compliance), provide for law enforcement (if necessary), and conduct outreach to the community and schools. Staffing arrangements are discussed in more detail in chapter 4 of this study.

To estimate the potential costs of operating New Philadelphia as a new unit of the national park system, the National Park Service reviewed operations costs from comparable units of the national park system. These units included Nicodemus National Historic Site, River Raisin National Battlefield Park, Knife River Indian Villages National Historic Site, Lincoln Boyhood National Memorial, and Homestead National Monument of America (table 1). These sites have annual operating budgets ranging from approximately \$600,000 to \$1.3 million. These costs include staffing (including part-time and seasonal employees), as well as programming, maintenance, and administrative costs.

**Table 1. Annual Operating Costs at Comparable Units in the National Park System.\***

Unit of the National Park System	Annual Operating Costs (2015)
River Raisin National Battlefield Park, Michigan	\$604,000
Nicodemus National Historic Site, Kansas	\$676,000
Fort Union Trading Post National Historic Site, North Dakota	\$817,000
Knife River Indian Villages National Historic Site, North Dakota	\$870,000
Lincoln Boyhood National Memorial, Indiana	\$1,036,000
Pipestone National Monument, Minnesota	\$1,101,000
Homestead National Monument of America, Nebraska	\$1,259,000

\*Based on 2015 NPS Operations Summaries Included in FY17 Green Book.

Administering the site as a new national park system unit under the “umbrella” of an established national park could provide benefits such as shared space, equipment, and staff. Although an increase in NPS personnel would be required in any scenario involving direct NPS management, such an arrangement could reduce the number of administrative, resource, and maintenance personnel needed to support operations at the New Philadelphia Townsite. Chapter 4 of this study discusses NPS management scenarios and estimated costs in more detail.

While the estimated costs of acquisition, development, and operations associated with New Philadelphia would be modest in comparison to larger, more developed units of the national park system, any new expenditures would need to be carefully weighed in the context of the agency’s existing maintenance backlog and other fiscal constraints and in terms of potential future visitation.

Any facilities currently in the study area or constructed by the National Park Service such as a parking area, visitor kiosk/visitor center, restrooms, fencing, or interpretive installations would add to the agency’s maintenance requirements and recurring costs and may serve less than 4,000 visitors a year. Treatment of the historic structures within the New Philadelphia Townsite would represent a considerable cost to the National Park Service regardless if they were preserved in their current state, rehabilitated for public use, or removed from the study area. Baseline documentation and National Register of Historic Places determinations of eligibility would need to be completed for all of the structures located within the study area to guide removal or future treatment according to the Secretary of Interior preservation standards. Cost estimates for treatment of the Burdick House range from \$80,000 for removing the building from the study area to a possible \$2.5 million for rehabilitation for future public use and would require additional cyclic maintenance funding to maintain.

In summary, costs associated with acquisition, potential development, and operations of New Philadelphia represent a sizable investment and long-term costs to the National Park Service, while factors relating to the site’s remote rural location and limited above-ground resources would likely reduce potential visitation. While potential cost associated with the establishment and administration of a new park unit is only one factor considered within the feasibility analysis, it is difficult to conclude at this time that the study area could be effectively administered by the National Park Service at a reasonable cost that meets the feasibility criterion.

### Conclusion: Summary of Feasibility Analysis

The study area meets a number of factors considered under the analysis of feasibility. It is of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment. Current land ownership patterns, economic and socioeconomic impacts, and potential threats to the resources do not appear to preclude the study area from potentially becoming a new unit of the national park system.

There appears to be sufficient local support for inclusion of the study area within the national park system and public satisfaction with the current onsite visitor opportunities. Costs to maintain and update visitor facilities over time would need to be considered if the site is added to the national park system.

The establishment, development, and long-term operation and maintenance of the study area as a new park unit would incur substantial costs. Implementing cost-effective approaches to removing noncontributing structures; creating visitor experiences expected of the National Park Service; and administering staffing, operations, and programs at the site would be required for the site to be feasibly managed by the National Park Service.

## **EVALUATION OF THE NEED FOR DIRECT NPS MANAGEMENT**

### **Need for Direct NPS Management Criterion**

The need for direct NPS management is the fourth study criterion for inclusion within the national park system. In this section, management by public and private entities is evaluated to determine if these entities can effectively and efficiently provide long-term resource protection and visitor services or if direct NPS management is the clearly superior option.

In the context of a special resource study, “direct NPS management” means the National Park Service owns or manages lands within an authorized park boundary and has lead responsibility for park operations, resource protection, and visitor services. This level of management provides NPS sites with a dual mandate of resource preservation while providing opportunities for visitor enjoyment. “Clearly superior” is understood to mean that the National Park Service could provide optimal resource protection and visitor opportunities when compared to current management or other management scenarios. If other entities can provide an equivalent or superior level of resource protection and visitor services, the National Park Service will recommend they assume the lead management role.

### **Summary of Existing Management**

As discussed above, the New Philadelphia Townsite is owned by two nonprofit organizations—the New Philadelphia Association and the Archaeological Conservancy—and a private landowner—the Philadelphia Land Trust. The Archaeological Conservancy, New Philadelphia Association, and Philadelphia Land Trust collectively protect and maintain the site, with educational institutions given permission to conduct archeological research. Site improvements include noncontributing structures (the Burdick House and the relocated log structures discussed above), an informational kiosk, and a small gravel parking area with room for three or four automobiles. The site does not have visitor amenities such as bathrooms or other indoor facilities nor does it have a physical address, which makes wayfinding challenging. Several interpretive waysides that have been installed along a ¼-mile mown path provide onsite interpretation. Some of these waysides are part of the self-guided augmented reality walking tour. There are no interpretive rangers or regularly scheduled programs to educate and guide visitors through the site although guided tours have been conducted as part of special events. An assortment of several individual websites and posts from various partners and researchers offer online information and interpretation. The following paragraphs describe the individual partners and their management roles in more detail.

**New Philadelphia Association.** The New Philadelphia Association, founded in 1996, is a small volunteer organization that draws the majority of its members from the surrounding rural community. During the site visit and public meeting, many members expressed concern about the organization's aging demographic and how that factor places severe constraints on the New Philadelphia Association's ability to manage the site in the future. Their preservation and outreach efforts, in partnership with others, have resulted in the site being listed in the National Register of Historic Places in 2005, designated a national historic landmark in 2009, and included in the National Park Service National Underground Railroad Network to Freedom program in 2013. The group has also sponsored lectures and other off-site events to raise interest in the site among archeologists and the general public. The New Philadelphia Association property includes the Burdick House—the circa 1939, two-story brick farmhouse. Although the house does not contribute to the site's significance, it was built and owned by descendants of one of the town's original families. The Association has made modest improvements but has not renovated the house to serve as a visitor center or lodging for researchers as originally planned. At present, the building is leased to one of the McWorter descendants.

**The Archaeological Conservancy.** The Archaeological Conservancy is a national organization devoted to the preservation of archeological resources. In 2009, the organization purchased approximately 9 acres of the New Philadelphia Townsite including the town's historic commercial and activity center (Section 27, Blocks 2, 3, 8, and 9). The conservancy manages its portion of the study area as an archeological research preserve, allowing universities to conduct archeological field schools. Although public interpretation and outreach are not part of the Conservancy's mission, they have allowed the New Philadelphia Association to install an informational kiosk and self-guided augmented reality tour. The land owned by the Archaeological Conservancy also includes the three noncontributing, but historic, log cabins. The cabins were moved to the site around 1998 to approximate the type of development that may have existed onsite in the 19th century.

At that time, the structures were resized to protect some exposed foundations. These structures are not open to the public and may pose a potential visitor safety hazard. In addition, the cabins may cause a certain amount of confusion as visitors will likely believe they were part of the original town. While the organization's ownership of the property plays an important role in protecting and studying the site's resources, the Archaeological Conservancy does not play an active role in visitor use management or site maintenance (including maintenance of the three noncontributing log cabins).

**Illinois State Museum.** During the 2000s, numerous university archeological field schools worked to survey the New Philadelphia site. Artifacts excavated during these efforts were collected and catalogued under the supervision of Dr. Terry Martin, Curator Emeritus with the Illinois State Museum. In 2015, private landowners and the New Philadelphia Association deeded all items recovered from the New Philadelphia site between 2002 and 2011 to the Illinois State Museum. The deed specifies that the collection must remain in the public domain and, when and if suitable artifact storage and exhibition space is available at the New Philadelphia site or vicinity, it must be made available for exhibition. As of this study, a few New Philadelphia artifacts are on loan to the National Museum of American History and the National Museum of African American History and Culture. Locally, several artifacts have been loaned to the Central Illinois African American History Museum for a short-term exhibit.

The New Philadelphia collection is currently housed at the Illinois State Museum Research and Collections Center in Springfield, Illinois. It consists of 148 curation boxes (approximately 150 cubic feet of material) and several oversized items. The collection includes 14 boxes of paper documents; 18 boxes of artifacts gathered during walkover surveys in 2002 and 2003; and 116 boxes of artifacts, faunal remains, plant remains, and miscellaneous debris collected by National Science Foundation-Research Experience for Undergraduates field projects over six seasons of investigations. The collection was catalogued during field schools following NPS guidelines and has been reviewed and revised by historic archeologists.

**Philadelphia Land Trust.** The Philadelphia Land Trust encompasses one parcel of land within the study area and is overseen by an individual who lives on the farm adjacent to the New Philadelphia site. The owner assists with site maintenance—for example, by mowing along the road and areas such as the self-guided augmented reality tour. This landowner is supportive of the site’s inclusion in the national park system and created the trust to provide stability to the parcel’s ownership and future management. The land held by the Philadelphia Land Trust is agricultural and is protected through participation in the US Department of Agriculture Farm Service Agency Conservation Reserve Program (CRP). In exchange for a yearly rental payment, landowners enrolled in the program agree to remove environmentally sensitive land from agricultural production and plant species that will improve environmental health and quality. Contracts for land enrolled in the Conservation Reserve Program are 10 to 15 years long. Future owners of the property must agree to the terms of the program for the life of the contract.

**Current NPS program support.** New Philadelphia is recognized as a national historic landmark for its significance and the high research potential of its archeological resources. The National Historic Landmark program—which oversees the almost 2,600 properties designated National Historic Landmarks by the Secretary of the Interior—is administered by the national park system and works to preserve the stories of nationally important historic events, places, and people by helping protect the historic character of national historic landmarks. Designation of a property as a national historic landmark does not change the ownership of the property or private property rights granted to the landowner(s), but national historic landmark status provides an additional level of protection against incompatible federally funded development projects. national historic landmark program representatives monitor the condition of national historic landmark properties to ensure impacts from actions funded, licensed, or initiated by federal agencies that may harm nationally significant resources associated are considered during the federal compliance process.

The National Historic Landmark Program reviews federal undertakings as part of the National Historic Preservation Act Section 106 consultation and may suggest modifications that avoid, minimize, or mitigate actions that affect national historic landmarks. As a designated national historic landmark, the New Philadelphia site is currently part of this program and receives this level of federal monitoring and protection.

Additional benefits of the National Historic Landmark Program include access to NPS expertise and funding opportunities. National Historic Landmark Program representatives can provide interested national historic landmark owners information on a variety of preservation subjects and connections to preservation experts. The National Park Service can also provide technical assistance in the form of property condition information and site-inspections when funding allows. National historic landmark owners are also encouraged to apply for grants, tax credits, and other state and federal funding opportunities available through the program to maintain the site’s historic character. In the past, the New Philadelphia Association received technical assistance from NPS program representatives and has collaborated with Lincoln Home National Historic Site cultural resource staff on educational materials.

The Town of New Philadelphia’s verifiable connection to the Underground Railroad led to its inclusion in the National Underground Railroad Network to Freedom (NTF) program. The program, also operated by the National Park Service, serves to coordinate preservation and education efforts nationwide to create a mosaic of community, regional, and national stories associated with the Underground Railroad. As a member of the Network to Freedom, New Philadelphia site managers have access to technical assistance from NPS NTF staff, trainings and program workshop, and grant opportunities. In past years, funding has been federally appropriated specifically for the NTF grant program or drawn from the NTF operational funds to provide support for preservation and related research at network sites. Sites within the network can also display the NTF program logo and use it within promotional material.

As a recognized NTF site, New Philadelphia participates in the popular National Park Service Passport to Your National Parks Initiative and has site-specific validation stamps available at the Barry Public Library and Barry City Hall.

### Potential Management Frameworks

Several options were considered for future management of the site including management by the existing partners, management by state or local agencies, inclusion in a national heritage area, and designation as an NPS affiliated area.

**Continued management by existing site partners.** Through their collective efforts, the New Philadelphia Association, Archeological Conservancy, and Philadelphia Land Trust protect and maintain the site. The New Philadelphia Association is passionate about preserving the site and interpreting its history and has proven successful at fundraising and competing for research and preservation grants. As an all-volunteer organization, its members currently do not have the capacity to offer broad interpretive programming, nor are they able to offer on-site staff a coordinated online presence or support for the daily maintenance of the site and future visitor facilities. The New Philadelphia Association successfully secured funding to construct the visitor kiosk, but it may prove difficult for the group to raise future funding to construct additional visitor amenities such as restrooms, and these types of infrastructure projects do not traditionally compete well for preservation grant funding. The Archaeological Conservancy is a research-focused organization that manages nine acres of the study area as an archeological reserve. While this designation provides resource protection and research opportunities, it does not provide visitor services or interpretation.

In theory, direct National Park Service management could expand resource protection, ensure the area is managed according to federal mandates and NPS policy, and expand interpretation and visitor access, which could be beneficial for long-term site protection and management; however, developing a new unit of the national park system is a slow process. If New Philadelphia was established as a new unit, it may take over a decade for federally funded projects to be started or site-specific staff to be hired based on the precedence of other recently established units.

During outreach, members of the community, including New Philadelphia Association members, expressed concern regarding the ability of current nonprofit management entities and the Philadelphia Land Trust to sustain resource protection and site interpretation in the long term because of the reliance on volunteers and lack of a steady source of income for programming and staffing. These concerns may be valid; however, it must be acknowledged that these three partners have been successful at protecting, interpreting, and promoting the site and its history, as demonstrated by their many accomplishments and the site's inclusion in the national historic landmark and NTF programs. The current nonprofit management entities and private landowner have more flexibility in the management and development of the site than would be allowed to the National Park Service if the site was federally owned. The nonfederal management entities would maintain access to NPS technical experts, grant opportunities, and preservation communities through their participation in existing NPS programs. As a result of this, the current level of resource protection and site interpretation appears sufficient to support future visitor experiences and maintain the archeological resources in their current condition.

**Management by state or local government agencies.** The current fiscal situation of state parks across America has become more tenuous in recent years. This is especially true for Illinois where the state has struggled to ease its \$111 billion unfunded pension liability. The crisis has severely impacted the Illinois Department of Natural Resources (DNR), the department that manages state parks. Staffing at DNR dropped 40 percent since 2000 according to the American Federation of State, County and Municipal Employees Council 31, the union that represents DNR workers.<sup>37</sup> The Illinois Historic Preservation Agency, the state historic preservation office, operates 56 historic sites and monuments. Twenty-six of these sites are staffed.

37. Katie Drews, "Financial crisis taking \$720 million toll on Illinois state parks, investigation finds," *Reboot Illinois*, August 26, 2015, accessed November 2016, hyperlink to website unavailable.

Like other counties across the state, Pike County has faced similar budget shortfalls because state lawmakers have cut funding for local government programs. Neither state nor local governments have the capacity to undertake capital projects or develop new properties. National Park Service management would be superior to management by state or local governments.

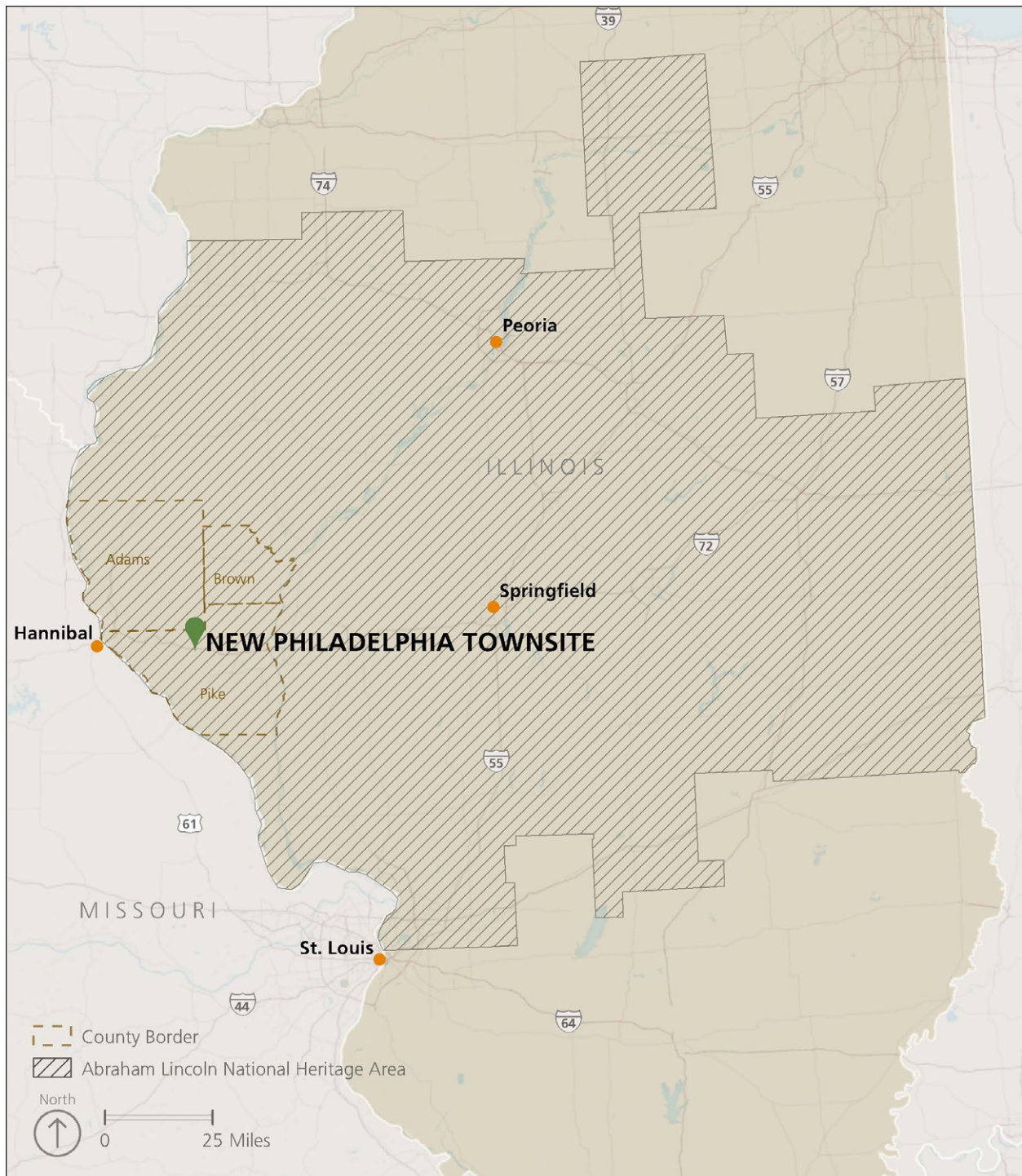
**Continued management by existing site partners with increased NPS support.** New Philadelphia Townsite was considered for inclusion in a national heritage area or as an NPS affiliated area. Both options offer the site NPS brand recognition, as well as some technical or financial aid from the National Park Service, without direct NPS management.

**National heritage area**—National heritage areas (NHAs) are designated by Congress as places where natural, cultural, and historic resources combine to form a cohesive, nationally important landscape. Individual sites are managed independently within a regional framework of related sites but benefit from NPS brand recognition, as well as opportunities for technical support or financial aid from the National Park Service through the NHA program. In 2008, Congress designated the Abraham Lincoln National Heritage Area, comprising 42 central Illinois counties including Pike County (map 6). According to its mission and vision, “the Abraham Lincoln National Heritage Area is a partnership of organizations and individuals dedicated to enhancing the communities and landscapes of central Illinois through recognition and support of their significant natural, cultural, and historical legacies. The heritage area explores this history and its meaning through the lens of Abraham Lincoln’s life and times.”

New Philadelphia’s inclusion in the Abraham Lincoln National Heritage Area was considered as a potential management alternative because the historic site’s Pike County location falls within the national heritage area geographic boundaries. New Philadelphia’s founding and initial development paralleled Abraham Lincoln’s time in Central Illinois and add historic context to Lincoln’s actions when president.

While the nationally significant resources and stories associated with New Philadelphia are not directly connected to Abraham Lincoln, the archeological site represents life on the Illinois frontier in the 1830s. Frank McWorter’s story of freedom and settlement provides additional perspective on the complicated topics of slavery, race, and economic success in antebellum Illinois. In the future, New Philadelphia could be added as a featured site within the national heritage area if the NHA coordinating entity determined the site supported its mission and vision as an associated resource, a decision that may result in an updated national heritage area management plan. If New Philadelphia was incorporated into the Abraham Lincoln National Heritage Area, the current management entities and owners, in partnership with the NHA coordinating entity, Looking for Lincoln Heritage Coalition, would be expected to continue providing preservation and interpretation of the site that aligns with the heritage area’s current management plan and other planning documents.

**NPS affiliated area**—NPS affiliated areas preserve properties outside the national park system that are linked in importance and purpose to the larger system. These related areas are established by Congress or through administrative action of the Secretary of the Interior under the authority of the Historic Sites Act of 1935; however, unlike the majority of units of the national park system, these sites are not federally owned or directly managed by the National Park Service. The role of the National Park Service in the management and administration of affiliated areas is typically outlined in the designation legislation or Secretarial action and vary from strong partnerships with NPS staffing to occasional programmatic assistance. Federal funding for affiliated areas is determined on a case-by-case basis. Affiliated areas established through legislative means may receive base funding for staffing and/or interpretation and operations through the Department of Interior just like federally owned and managed units of the national park system. Areas established through administrative action may only receive direct federal funding if Congress specifically appropriates funding for that site. Other affiliated areas receive no federal funding; their primary connection to the National Park Service is through technical assistance.



**Map 6.** Abraham Lincoln National Heritage Area.

The paths used to create affiliated areas are as varied as their approaches to federal funding. In the past, some sites, such as Thomas Cole National Historic Site, have been designated affiliated areas after the completion of a special resource study. Other historic sites that were designated affiliated areas were later redesignated as units of the national park system, as in the cases of Port Chicago Naval Magazine National Memorial and the Belmont-Paul Women's Equality National Monument. Oklahoma City National Memorial was initially designated a unit of the national park system to be managed as a partnership park and was later redesignated as an affiliated area.

To be eligible for affiliated area status, NPS *Management Policies 2006* guidelines state the potential area's resources must (1) meet the same standards for 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; and (4) be assured of sustained resource protection, as documented in a formal agreement between the park service and the nonfederal management entity. This special resource study has determined that New Philadelphia Townsite is significant and is considered suitable for inclusion in the national park system and thereby meets the first two eligibility criteria for affiliated areas.

If New Philadelphia were designated an NPS affiliated area, the current management partners would be expected to adhere to federal mandates and the high standards specified in NPS management policies, as stated in affiliated area eligibility criterion 3. As a volunteer organization and conservation nonprofit, New Philadelphia's current management entities may not be equipped to assume the additional responsibilities connected to federal compliance and the management constraints associated with federal policies required for an affiliated area; the management organizations could potentially require additional funding or direct NPS support to continue to offer visitor facilities and experiences that meet NPS standards and comply with federal regulations.

Any arrangements for continued NPS involvement and/or funding at the site would ideally be outlined in establishing legislation.

The action that established the New Philadelphia as an affiliated area would guide the development of any subsequent formal partner agreements between the non-federal site managers and the National Park System necessary to meet eligibility criterion 4. Additional evaluation of the potential benefits and feasibility of an affiliated area designation for the New Philadelphia site is recommended.

### **Conclusion: Summary of Need for Direct NPS Management**

Direct NPS management of New Philadelphia Townsite could offer sustained resource protection and broad interpretive offerings associated with the National Park Service. However, this study finds that the New Philadelphia Association and the Archaeological Conservancy are currently providing adequate resource protection and visitor access to the site to support public enjoyment. The site already receives NPS technical support through the national historic landmark and NTF programs and has the potential to further leverage both programs in the future through collaboration with the Abraham Lincoln NHA and the Lincoln Home National Historic Site. Affiliated area status has the potential to provide a higher level of NPS support and the possibility of federal funding, depending on the mechanism used to establish the affiliated area and the formal agreements developed between the National Park Service, current site managers, and other supporting entities. Given these opportunities, it appears full NPS management would have limited additional benefit. The level of protection and visitor opportunities provided by the current management entities appears sufficient.

## SUMMARY OF FINDINGS

Based on the analysis performed through this special resource study, the National Park Service concludes that the New Philadelphia Townsite meets some of the established criteria for new national park system units, but not others.

- **National significance.** As a designated national historic landmark, the New Philadelphia Townsite possesses cultural resources that are nationally significant. The study area meets this criterion for inclusion in the national park system.
- **Suitability.** The New Philadelphia Townsite represents a natural or cultural resources type that is not already adequately represented in the national park system or protected for public enjoyment by another federal, state, local, nonprofit, or private entity. The study area meets this criterion for inclusion in the national park system.
- **Feasibility.** The study area meets feasibility factors for sufficient size and configuration, land ownership patterns, economic and socioeconomic impacts, potential threats, and local support to ensure sustainable resource protection and visitor enjoyment as a new unit of the national park system. However, the establishment, development, and long-term operation and maintenance of the study area as a new national park would incur substantial costs. Implementing cost-effective approaches to removing noncontributing structures; creating visitor experiences expected of the National Park Service; and administering staffing, operations, and programs at the site would be required for the site to be feasibly managed by the National Park Service.
- **Direct NPS management.** Direct NPS management may be optimal from the standpoint of offering sustained resource protection and broad interpretive offerings. However, this study finds that the New Philadelphia Association and the Archaeological Conservancy are currently providing adequate resource protection and visitor access to support public enjoyment. Existing NPS programs offer condition monitoring, technical support, educational training, and grant opportunities for research and interpretation.

## CHAPTER 4: NATIONAL PARK SERVICE MANAGEMENT ALTERNATIVES

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While conducting the New Philadelphia special resource study, the National Park Service considered a range of management alternatives to help better understand the potential costs associated with administering the study area as a new unit of the national park system and to help identify the most efficient and effective method for protecting significant resources and providing for public enjoyment. Management alternatives presented in a special resource study build off the findings of national significance, suitability, and feasibility and present a management approach different from the existing situation. Potential management alternatives can consider management under NPS programs such as a national heritage area, partner initiatives led by the National Park Service or nonfederal entities, or direct NPS management in the form of a new unit of the national park system.

Any management scenario included in a special resource study is considered a theoretical management strategy. Cost estimates included within a special resource study's feasibility evaluation or alternatives for management are preliminary and would be further developed as part of future planning documents or construction/development projects if the study area were to be owned or managed by the National Park Service. If the study area were to become a unit of the national park system, future NPS planning documents such as a general management plan would provide guidance on how the area would be administered and developed. In the event of designation, future management may or may not reflect the potential management alternatives presented in this chapter.

### ALTERNATIVES FOR NPS MANAGEMENT

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#### Management through NPS-Administered Programs

NPS-administered programs such as national heritage areas, the national trails system, and national historic landmarks represent the many partnerships that work with the National Park Service to ensure the nation's heritage is conserved, protected, and managed for this and future generations. These programs offer recognition, technical assistance, and grant opportunities for resources not owned by the National Park Service or directly managed as a unit of the national park system.

As noted previously, the New Philadelphia Townsite is recognized as a national historic landmark and is part of the NPS Underground Railroad Network to Freedom Program. Through these designations, the site is already provided technical assistance and access to grant funding for certain purposes. These designations and program benefits would continue under any management scenario.

**NPS affiliated area.** An affiliated area is one model for preserving significant properties outside of a designation as a unit of the national park system. These sites are not owned or administered by the National Park Service but rather by some nonfederal management entity. In many cases, an existing nonprofit, state agency, or local government that owns the site or has an existing relationship with the National Park Service assumes the role of management entity. Although they are not federally owned, affiliated areas benefit from NPS brand recognition and may receive technical and financial aid from the National Park Service.

As outlined in chapter 3, New Philadelphia meets criteria for the national significance and suitability needed to qualify as a new unit of the national park system or an affiliated area. Affiliated area status could confer additional NPS recognition to the site and could provide additional opportunities for NPS technical support or funding beyond what the site already receives. Affiliated area designation would likely include a formalized agreement between New Philadelphia Association, the Archaeological Conservancy, and the National Park Service for interpretive and public programming assistance.

While affiliated area legislation may formalize the relationship between nonfederal management partners and the National Park Service, affiliated area status does not include additional management support or guarantee NPS funding. A partner group would need to be identified that demonstrates the ability and commitment to serve as a sustainable long-term management entity for New Philadelphia to meet affiliated area criteria. Affiliated area status requires nonfederal management entities to manage resources according to federal mandates and NPS management policies related to natural and cultural resources. The New Philadelphia Association and the Archaeological Conservancy have successfully competed for grants, continued archeological survey at the site, opened the site to visitors, and collaborated with Lincoln Home National Historic Site on visitor experiences and interpretation. If Congress were to consider establishing New Philadelphia as an affiliated area, potential nonfederal partners would need to demonstrate the capacity for long-term management of the site in accordance with federal resource protection mandates and NPS policies and the ability to provide considerable financial support for resource protection and visitor opportunities.

**Inclusion in a new or existing NPS national heritage area.** Congressionally designated national heritage areas highlight nationally important, distinctive assemblages of resources that are best managed for conservation, recreation, education, and continued use through partnerships among public and private entities at the local or regional level. These designated areas are nationally significant, lived-in landscapes that convey important national stories and themes over broad geographic areas. They are normally built on continued community collaboration and highlight continued use alongside economic development and heritage tourism.

As discussed in chapter 3, Pike County, Illinois, is included in the 42-county Abraham Lincoln National Heritage Area. Sites within national heritage areas are not directly managed or owned by the National Park Service but receive NPS technical and interpretive support. If New Philadelphia were to be recognized as a highlighted resource/site in the Abraham Lincoln National Heritage Area or any newly established National Heritage Area, it could be eligible for additional funding and marketing support from the NHA coordinating entity. The addition of New Philadelphia as a related resource/site within the established Abraham Lincoln National Heritage Area, which would be at the discretion of the Looking for Lincoln Heritage Coalition as the NHA's coordinating entity, could require an update to the Abraham Lincoln National Heritage Area management plan.

## Direct NPS Management Alternatives

This study finds that the New Philadelphia study area does not fully meet all of the criteria necessary for designation as a new unit of the national park system. A special resource study serves as one of many sources of information, and ultimately, Congress determines whether to establish a new unit, regardless of study findings. The following section presents scenarios for direct NPS management that may be available if Congress were to designate New Philadelphia as a new unit of the national park system. Under these scenarios, the National Park Service would take a larger role in day-to-day management tasks and staffing at a site than it would in the NPS program scenarios presented above.

**Boundary adjustment to existing unit of the national park system.** Proposed boundary adjustments to existing units of the national park system must meet the criteria contained in section 3.5 of *NPS Management Policies 2006*. Land considered for a boundary adjustment must meet at least one of the following three criteria: protect significant resources and values or enhance opportunities for public enjoyment related to park purposes; address operational and management issues; or otherwise protect park resources that are critical to fulfilling park purposes. A boundary adjustment management option may be considered when a boundary expansion to an existing park close to the study area appears to be a viable management framework. Resources in a potential boundary adjustment do not have to meet the national significance criterion; rather, they must be shown to be directly related to the purposes of an existing park. Typically, boundary adjustment studies are requested by Congress, but they are sometimes considered in special resources studies as a management alternative.

As stated in the evaluation of national significance, the New Philadelphia study area is significant for its archeological resources that relate to the integrated frontier community established in 1835 by a free African American. The site's history and resources are not directly associated with any existing unit's legislated purpose.

Lincoln Home National Historic Site, located 90 miles away from the study area in Springfield, Illinois, is the closest unit of the national park system to New Philadelphia. It was established in 1972 to preserve the home in which Abraham Lincoln lived from 1844 to 1861 and the surrounding Lincoln-era neighborhood. Lincoln Home National Historic Site interprets Lincoln's time in Illinois, which paralleled New Philadelphia's early development. Although Lincoln's 24 years in Springfield had a considerable impact on his personal and political beliefs, the resources at New Philadelphia are not directly tied to the story of Lincoln's time in Illinois. Therefore, the study area does not support the legislated purpose of Lincoln Home National Historic Site.

While New Philadelphia does not directly support the legislated purpose of Lincoln Home National Historic Site, the two historic sites share the themes of freedom, justice, and frontier life in mid-19th-century Illinois. These complementary stories link the interpretation of the sites; New Philadelphia's history and archeological resources provide context to Lincoln's later political views and the cultural climate near the Illinois-Missouri border in the decades leading up to the Civil War. If Congress were to add the New Philadelphia study area to the Lincoln Home site through a boundary adjustment, the act would require a substantial revision to Lincoln Home National Historic Site's enabling legislation in terms of Lincoln Home's purpose and legislated boundaries.

**NPS-led collaboratively managed areas (partnership park).** A collaborative framework or partnership model led by the National Park Service is another option that may be available to special resource study areas that are determined to require direct NPS management. In this model, the National Park Service operates in partnership with others and has the lead in specific areas such as interpretation and technical assistance but shares ownership and management responsibilities of the land and resources located within the unit's legislated boundaries. This management model requires one or more federal or nonfederal management entities with substantial ownership and commitments to continuing resource protection and providing visitor enjoyment.

This model may prove beneficial in cases where it may not be feasible for the National Park Service to own and manage an area entirely on its own.

The New Philadelphia Association and the Archaeological Conservancy own the majority of the study area and are responsible for the visitor opportunities currently available at the site. If Congress were to consider establishing New Philadelphia as a partnership park, potential partners would need to demonstrate the capacity for long-term involvement at the site and the ability to provide considerable financial support for resource protection and visitor opportunities.

**Potential new unit of the national park system.** The following text describes a direct NPS management alternative in which the National Park Service is the primary land owner and assumes responsibility for the administration of the study area. This management alternative was developed to support the evaluation of feasibility by better understanding the implications of managing the New Philadelphia site as a unit of the national park system. Fleshing out this alternative in a degree of detail helped illustrate the potential costs associated with the establishment of a New Philadelphia unit of the national park system, including total costs of facilities (TCFO) related to current and potential development. Variability has been built into this alternative to convey what *may happen* if a new unit were to be established. Rather than being prescriptive, this generic representation is intended to present the types of activities the National Park Service *could* undertake and various scenarios the agency could consider.

Considering the site's rural location and the nature of its resources, the majority of which are underground, different NPS management alternatives could be possible. Management alternatives could include management as a standalone unit of the national park system with staff stationed on-site or administration as a new unit under the umbrella of an existing park. Potential park partners could also play a role in future site management where appropriate. In any direct NPS management alternative, site development would likely be limited, with an emphasis on innovative interpretation techniques and technology to bring the existing archeological resources to a broader audience.

This approach would highlight the study area as an archeological site with limited aboveground resources while allowing a diverse audience to connect to the stories associated with the site.

**Overall concept (park purpose)**—As a new unit of the national park system, New Philadelphia would preserve the archeological resources associated with the New Philadelphia townsite and tell the story of Frank McWorter and the struggle of free African Americans on the American frontier during the 19th century. This new unit of the national park system would discuss the realities of living in an integrated rural settlement near the Illinois-Missouri border before the Civil War, the continuing struggles of African Americans in the Midwest after the Civil War, and the field of historic archeology.

**Boundary**—Public Law 113-291, section 3051, directed the New Philadelphia special resource study to consider the “New Philadelphia archeological site and surrounding land” for its potential as an addition to the National Park Service. The archeological resources located within the 42-acre New Philadelphia Townsite National Historic Landmark are the only resources presently determined to be nationally significant in the study area. In the feasibility section of this study, the 42-acre national historic landmark boundary was determined to be of sufficient size and configuration for the National Park Service to manage the site and preserve its resources.

Including additional land in a potential park boundary could help preserve the New Philadelphia site by moving potential future visitor and staff facilities outside the national historic landmark boundary. According to Section 110(f) of the National Historic Preservation Act, federal agencies must “to the maximum extent possible, undertake planning and actions as may be necessary to minimize harm” to national historic landmarks. The New Philadelphia Land Trust owns additional parcels abutting the New Philadelphia site's eastern portion while lands west, north, and south of the national historic landmark boundary are privately owned. This adjacent land could be considered for the placement of administrative functions or new development associated with the site.

Alternatively, the National Park Service could consider locating visitor or administrative facilities on a remote site in order to preserve significant resources at New Philadelphia, but this may require leasing space or constructing additional buildings offsite to house these park functions.

If Congress were to designate New Philadelphia as a new unit of the national park system, the park's enabling legislation would include a detailed description of park boundaries that would guide future planning and park management. Additional resources associated with Frank McWorter and the New Philadelphia community, including the Frank and Solomon McWorter home sites, the McWorter Cemetery and Frank McWorter gravesite, and the site of the integrated school, are located near the study area but are not included in the existing national historic landmark boundary and have not been evaluated for national significance. Additional research and archeological survey may strengthen the case for these resources' national significance and further document their connection to the New Philadelphia site.

**Cost considerations**—Costs to acquire, develop, and manage the property as a new unit of the national park system might vary widely, depending on a number of factors. The National Park Service identified three broad factors that have the potential to greatly affect the costs associated with converting the New Philadelphia site into a new unit of the national park system: site management/administration; level of development (both existing and needed for a unit of the national park system); and treatment of the Burdick House. These interrelated factors are discussed below.

**Management**—A major component of a park's annual operating budget is dedicated to staffing and overall site management. Traditional NPS management is usually understood to mean NPS administrative, interpretive, resource management, and maintenance/facilities staff stationed onsite under a park superintendent.

To operate New Philadelphia as a new unit of the national park system, the National Park Service would need to provide appropriate visitor opportunities and resource protection.

Annual operating budgets for seven parks comparable in size to New Philadelphia range from \$600,000 to \$1.3 million (table 1). This budget includes permanent staff, supplies and equipment, and basic operation and maintenance of facilities. Staff levels at comparable NPS units in Interior Regions 3, 4, and 5 varied from 7 to 15 full-time equivalent (FTE) employees. River Raisin National Battlefield Park represents a recently established unit of the National Park Service within DOI Region 3 that primarily protects archeological resources and associated cultural landscapes. The park had a 2015 annual budget of approximately \$600,000 and a staff of seven full-time equivalent employees.

Table 2 summarizes an example FTE staffing allocation for a relatively small park unit with a cultural resource interpretive focus and limited above-ground resources. The example allocation is based on analysis of need for an existing unit of the national park system that is comparable to New Philadelphia in terms of resources, setting, and location.

**Table 2. Staffing Example from Nicodemus National Historic Site Business Plan.**

Division/Position	FTE	Grade	Total*
Superintendent/Site Manager	1	GS12	\$103,923
Administrative Officer	1	GS9	\$71,662
Interpretive Ranger	1	GS9	\$71,662
Interpretive Ranger	1	GS7	\$58,586
Education Technician	1	GS7	\$58,586
Facility Operations Specialist	1	GS11	\$86,701
Maintenance Worker (STF)	0.7	WG7	\$48,432
<b>TOTAL</b>	<b>6.7</b>	<b>N/A</b>	<b>\$499,552</b>

\*Includes benefits escalation of 35% for all staff.

Source: Nicodemus National Historic Site Business Plan; OPM 2017 Salary Tables and Federal Wage Rate.

Schedule for the St. Louis, Missouri, wage area to estimate costs for New Philadelphia.

Because of New Philadelphia’s relatively small size, lack of development, and limited aboveground resources, another management scenario potentially could be effective. One option for management of a New Philadelphia as a new unit of the national park system could be shared administration out of an established park. This approach, which would recognize New Philadelphia as a new unit of the national park system with its own park purpose and individual place within the park system, would allow New Philadelphia and another park unit to share staffing and building efficiencies with existing NPS employees and office space.

Additional FTE positions would be necessary to properly manage the site’s resources and provide onsite visitor opportunities under any NPS management scenario. While these new positions could be kept to a minimum if administrative and management efficiencies were developed between New Philadelphia and existing parks, any direct NPS management alternative would affect the current staffing shortfall being experienced by the agency. 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.<sup>38</sup> As a result of budget constraints and agency-wide priorities, it would likely take several years for the National Park Service to fully staff and operate any newly designated unit of the national park system. Although the estimated annual budget of new units is expected to increase as the resources stewardship program and visitor experiences are established, it is unlikely New Philadelphia would receive more staffing or financial support should the site become a new unit of the national park system in the near future if the NPS budget remains stable or experiences reductions.

**Administration**—Nearby units of the national park system could potentially help with the administration and management of New Philadelphia if the site were to become part of the national park system (map 7).

For example, Lincoln Home National Historic Site in Springfield, Illinois, is located approximately 80 miles east of the study area. Ulysses S. Grant National Historic Site is in St. Louis, Missouri, approximately 120 miles south of the study area. Both of these established units of the national park system preserve and interpret 19th-century resources and are within driving distance of the study area. Driving times from either of these existing parks to the study site are under two hours by way of major highways. If New Philadelphia were designated as a new national park unit under the shared administration of an existing park, new staff offices could be housed in existing NPS administrative space, saving costs related to renting space in a neighboring community or constructing new onsite offices.

**Staffing**—Staff is essential for providing visitor opportunities, resource protection, and site management for all units of the national park system. If New Philadelphia were directly managed by the National Park Service as a new park, staff would be required to operate the site. While adding the site to the National Park Service would result in an immediate need for NPS staffing, there could be opportunities to find efficiencies by administering New Philadelphia under an existing unit of the national park system.

Existing park positions at Lincoln Home National Historic Site or Ulysses S. Grant National Historic Site could assume some of the duties associated with managing the New Philadelphia site as a new unit of the national park system and provide technical expertise. However, a staffing increase would be necessary to support the duties needed to properly maintain the New Philadelphia park unit and travel time necessary for shared staff to move between parks. The staffing increase could occur by adding FTE staff to an existing park’s interpretation, facilities, or resource management staff to meet New Philadelphia’s needs or by creating new positions associated with a New Philadelphia unit of the national park system.

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



**Map 7.** New Philadelphia Township—Nearby National Historic Sites.

One benefit of operating a new unit of the national park system under the administration of an existing unit might be staff support in the form of shared administration, interpretation, resource management or maintenance staff. Adding duties related to managing New Philadelphia to an existing administrative officer position would result in minimal additional FTE and save costs on office supplies and utilities. Maintenance staff could make regularly scheduled trips to New Philadelphia to tend to grounds maintenance or small upkeep projects. Larger construction or repair projects, as well as day-to-day maintenance tasks could be contracted to local firms. While contracted labor is generally more expensive than federal employees, this would provide additional flexibility in staffing.

Preliminary analysis indicates that New Philadelphia may be able to operate with as few as 3.7 FTE positions added to an existing park's staff if a shared administrative framework is pursued. If the site were administered under the umbrella of an existing unit of the National Park Service, it could forego the assembly of its own management team and reduce its permanent payroll to approximately \$300,000 annually, resulting in an annual savings of approximately \$200,000. Table 3 summarizes estimated staffing of a New Philadelphia unit if administered under an existing unit of the national park system. These estimates are preliminary but represent the cost savings potential of shared administration and staffing.

**Table 3. Example Staffing of New Unit Administered under Existing Park.**

Division/Position	FTE	Grade	Total*
Superintendent/ Site Manager	1	GS12	\$103,923
Interpretive Ranger	1	GS9	\$71,662
Interpretive Ranger	0.7	GS7	\$41,010
Maintenance Worker (STF)	1	WG7	\$69,189
<b>TOTAL</b>	<b>3.7</b>	<b>N/A</b>	<b>\$285,784</b>

\*Includes benefits escalation of 35% for all staff.

Source: OPM 2017 Salary Tables and Federal Wage Rate Schedule for the St. Louis, Missouri, wage area.

**Interpretation**—New Philadelphia represents a unique resource type within the National Park Service in that the nationally significant archeological resources associated with the 19th-century integrated community remain underground, and the site has very few aboveground resources. This allows for interpreters to be creative when considering the park's approach to interpretation and educational materials. The study site currently has an “augmented reality” tour available through an electronic app that allows visitors with a tablet or mobile phone to interact with the landscape. While the app is new and a departure from the traditional interpretive program offered at many NPS sites, it offers a novel experience and an informed self-guided tour. Technological advances could provide more interpretive opportunities at the site in the future without a significant increase in onsite interpretive staff. Web-based educational materials could supplement the experience and provide additional context for those planning a visit to the site or potential visitors that would like to learn more about the study area's resources outside of an interpretive program.

Under a traditional NPS management model, interpretive staff is stationed at the park unit to offer daily site orientation and programming. The logistics of the New Philadelphia site—its rural location, small size, and limited aboveground resources—present certain challenges under the traditional NPS management and interpretation model. Smaller park units in rural areas experience comparatively low visitation, and park staff may not interact with many visitors on an average day. Therefore, if the National Park Service assumed management and interpretation responsibilities at the site, it could consider nontraditional approaches to address potential interpretive staffing challenges. For instance, the New Philadelphia site could be staffed seasonally. Staff could provide daily, onsite programs and visitor orientation at New Philadelphia during the warmer months when visitation would be expected to peak. Onsite interpretation at New Philadelphia during the winter could be limited to static interpretive signs found at the townsite or electronic media that builds off the existing app tour for visitors.

Bus tours could be another option for an interpreter-led experience of the site. Under this strategy, the site would not be regularly staffed; visitors to the New Philadelphia site could get information from roadside interpretive signs. Paid interpreters or volunteers associated with potential partners could host regularly-scheduled bus tours for visitors or groups interested in a ranger-led experience. This approach could allow a brief self-guided experience of the site for those not participating in scheduled tours and would not require staff to be routinely stationed at New Philadelphia. This approach could also fit the needs of school and special interest groups wanting to schedule ranger-led tours of the site. By limiting guided programs to bus tours, administrative staff could oversee scheduling, and New Philadelphia interpretive staff or partner nonprofit organizations could provide focused interpretation to larger groups.

Some visitors and groups may desire hands-on educational experiences related to the site's nationally significant archeological resources. Summer school group tours, camps, or archeological field schools may be able to meet this future need. These types of in-depth programs could potentially be offered by site staff or university partners. If New Philadelphia were designated as a new unit of the national park system, future planning efforts, such as a comprehensive interpretive plan and park-level management documents, would include guidance on NPS interpretive programming and potential partner roles.

***Potential partners and roles***—While it is assumed that the National Park Service would be the primary entity responsible for resource protection, land management, and interpretive activities under a direct NPS management scenario, the agency is always interested in cultivating relationship with partners to help support the NPS mission. Existing site partners and landowners may potentially support research and interpretation activities at the site and provide additional fundraising and volunteer support.

Potentially, the New Philadelphia Association could provide support in the form of generating additional local and national interest, park promotion, advocacy, and fundraising assistance. This organization has previously hosted research symposiums, lectures, and public programs in the vicinity of New Philadelphia and farther abroad. Similarly, the Archaeological Conservancy could continue to support research at the site through its national network of members and fundraising efforts. New Philadelphia could continue to be recognized as one of the Archaeological Conservancy's archeological research preserves with opportunities for fieldwork and study. Additional research partnerships may potentially be established with archeology and African-American study programs at nearby universities including the University of Illinois at Urbana-Champaign.

The National Park Service could also pursue partnership opportunities related to the curation and exhibition of New Philadelphia museum collections. The New Philadelphia archeology collection is owned by the Illinois State Museum and housed in the museum's Research and Collections Center in Springfield, Illinois. The National Park Service could subsequently pursue a formal agreement with the Illinois State Museum for the care and storage of artifacts removed from the site if New Philadelphia becomes a unit of the national park system or for artifact loans for future exhibits at NPS facilities. This arrangement would meet the agency-wide curation goal of combining federal repositories and using existing facilities that meet NPS curation standards. Future NPS planning efforts, such as a partnership plan or general management plan or park memoranda of understanding, could formalize these relationships and activities.

***Level of development***—Units of the national park system vary in level of development, but all parks require some level of facilities and infrastructure to meet the NPS mission of resource protection and public enjoyment. Current development at the New Philadelphia site is minimal and would likely remain limited under the potential direct NPS management option. Existing site facilities could be retained, expanded, or removed as appropriate.

As described in this study's resource description (chapter 2) and discussion of feasibility (chapter 3), the 42-acre New Philadelphia site is largely undeveloped. Public comments received during outreach activities voiced an appreciation for the openness of the site that allows visitors to connect with the prairie landscape associated with frontier Illinois. However, even if the largely undeveloped nature of the site were maintained under potential NPS management, construction and operation costs could vary greatly depending on the type of development pursued.

The National Park Service prepared two development scenarios for the purposes of comparison: a lower development scenario that includes minimal improvements needed for the site and a higher development scenario that expands visitor facilities. These are described in the "Site Improvements" section below.

At a minimum, the National Park Service would likely improve the existing parking area, provide additional interpretative waysides, and stabilize the existing noncontributing structures to improve visitor safety. A traditional NPS visitor center with space for offices, exhibits, and multiuse rooms that could be part of a higher development scenario would be more expensive to build and maintain than an open air information kiosk and shelter and visitor contact station. Sharing offsite administrative space with an existing unit of the national park system would cost less than constructing administrative space at the site or renting office space in a nearby community. Constructing interpretive waysides and creating onsite exhibit space would cost more than developing off-site programming. Technology-based interpretive materials may be costly to develop and update, but they may serve more visitors and cost less than a visitor center with room to display artifacts and show an orientation video. Future NPS management plans would provide direction on the appropriate level of onsite development to meet visitor and NPS management needs while best preserving the site's resources. This topic is further discussed in the "Site Improvements" section below.

Another cost consideration associated with the New Philadelphia study area is the lack of aboveground resources to manage and maintain.

Maintenance and resource protection costs would be modest in comparison to larger, more developed park units, in part because the site contains few structures and significant archeological resources are preserved in place underground (in situ). Six historic structures are located within the study area. Besides the Burdick House, which is discussed below, the existing structures are relatively small and would require relatively little maintenance. Because of their size, condition, and lack of contribution to the cultural landscape or New Philadelphia's nationally significant resources, these small buildings could be mothballed, which would require minimal investment until a suitable use was identified, or removed, which would result in a modest, one-time cost consideration. Archeological resources like those found within the New Philadelphia study area are relatively easy to maintain and require little maintenance or preservation investment.

**Existing development**—An approximately 30 foot x 30 foot open-air information kiosk and three-space gravel parking area are located near the county road. The information kiosk and adjacent gravel parking area are located within the historic New Philadelphia town boundary. While the facilities were originally sited near the road to provide easy access to visitors and limit disturbances in an area rich with archeological resources, the National Park Service could consider removing the existing facilities and placing new parking and visitor orientation areas outside the national historic landmark boundary to better protect in situ archeological resources and conserve the site's cultural landscape. If Congress designates New Philadelphia as a new unit of the national park system and defines the new park boundary as the 42-acre archeological site that corresponds with the national historic landmark boundary, the existing parking lot would need to be expanded to accommodate large vehicles and made accessible through grading and surfacing. The information kiosk could also be expanded and enclosed to provide shelter for visitors and groups during times of inclement weather.



The Information kiosk and gravel parking area.

The gravel road bisecting the study area is used as an access road and driveway for the residents of the parcel south of the study area. The road follows historic alignments of streets depicted in the 1836 plat of New Philadelphia. Under NPS management, the existing road could be maintained as an administrative road/emergency vehicle route through the site or converted to a visitor walking path. The road would likely require engineering upgrades if it continued to serve as a vehicular access route. If the road were to be converted into a visitor trail, it would need to be graded and sloped to meet accessibility standards.

Electricity is available at the information kiosk and Burdick House. The Burdick House plumbing uses well water and a septic system, which is common in rural Illinois. There are no municipal services offered in this unincorporated portion of Pike County. If New Philadelphia were to become a new unit of the national park system, some level of visitor facilities and administrative infrastructure would be needed to provide adequate resource protection and public enjoyment regardless of the management approach.



Augmented reality tour sign.

Interpretive signs linking to the site's "augmented reality" tour app follow a 0.25-mile mowed grass trail through the northeast portion of the study area. If New Philadelphia were to become a new unit of the national park system, interpretation of the site would be standardized. The existing trail would be formalized to meet accessibility standards and additional interpretive panels or waysides would likely be installed to increase visitor enjoyment and understanding of the townsite.

Six noncontributing structures are located in the study area: three 19th century log cabins that were relocated to the site to cover exposed foundations; the circa-1939 Burdick House; and two small outbuildings associated with the Burdick House. The relocated log cabins are in poor condition, have little historic integrity, and are not associated with the community of New Philadelphia. There are also visitor safety concerns related to deteriorating building materials and exposed nails. These cabins would almost certainly be removed under direct NPS management. The Burdick House chicken coop and barn are currently used for storage. These small, noncontributing buildings would likely be removed under direct NPS management.



Mowed grass trail and augmented reality tour signs.

***Burdick House***—The Burdick House is associated with the Burdick family, early settlers in New Philadelphia, but was not constructed until the 1930s, after the town suffered from major economic decline. The house falls outside New Philadelphia’s period of significance as an integrated town and archeological site, but it is the only surviving building associated with New Philadelphia’s history as a frontier community. During public outreach efforts, local community members and individual stakeholders expressed a strong interest in keeping the building within the study area as a tangible, aboveground link to some of the last residents of New Philadelphia. No condition assessment or historic documentation of the building has been completed, but the exterior appears to be in fair condition.

In recent years, the New Philadelphia Association has funded minor rehabilitation projects to update the residential plumbing and electrical systems for short-term lodging.

Treatment of the Burdick House could be a major cost consideration if New Philadelphia is established as a new park. The upkeep of historic structures, whether or not they are central to the park’s purpose, requires personnel with specialized maintenance and preservation skills. Future NPS management plans would provide guidance on how to approach the treatment of the Burdick House.



Burdick House.

The National Park Service could pursue many options for treatment of the Burdick House: rehabilitation and adaptive reuse, stabilization, or removal in the form of relocation or demolition.

- a. **Rehabilitation and adaptive reuse.** The building could be converted to offices, a visitor contact facility, temporary housing for researchers or a combination of uses. Rehabilitating the house would be costly in any scenario. Contractor figures received by the New Philadelphia Association in 2012 estimated \$300,000 to convert the building to a modest bunkhouse appropriate for archeological field school participants and visiting researchers, but it is uncertain what improvements this estimate includes.

Under NPS ownership, rehabilitation for public use would likely be more expensive once historic documentation, accessibility, and specialized work completed to NPS public use standards were considered. An NPS employee with experience rehabilitating historic structures speculated that it may cost \$2.5 million or more to abate any hazardous mid-20th-century building materials, update aging HVAC, electrical, and water systems, improve accessibility, and convert the residential building into public space.

- b. Stabilization. Considering the costs associated with rehabilitation and uncertainty over the Burdick House's use under potential NPS management, the National Park Service may decide to stabilize the building. Stabilization activities would focus on preserving the building in place and ensuring the roof, walls, openings, and foundation were secure so as to limit deterioration. NPS *Preservation Brief 31: Mothballing Historic Buildings* suggests closing up historic buildings that do not have a productive use or lack appropriate funding to be restored to useable condition.<sup>39</sup> Cost estimations for mothballing a building are assumed to be 15% of the cost of rehabilitation, so this treatment for the Burdick House could cost \$88,000, based on an estimate of \$589,000 for rehabilitation. This treatment could be pursued in the interim until a suitable use for the building could be found.
- c. Removal. Another option would be to remove the Burdick House from the New Philadelphia site through relocation or demolition. Costs would vary depending on the methods used to remove the building. Relocation would depend on finding a landowner willing to accept the house and funding for the potentially costly move. Local partners may be willing to fundraise for the relocation of the house to another site outside the potential park boundary. Using preliminary NPS estimates from similar projects, demolition of the structure would be a one-time cost of approximately \$80,000 including historic documentation, compliance, and environmental mitigation.

**Site improvements**—New site improvements would be required if New Philadelphia were designated as a unit of the national park system. At New Philadelphia, development associated with NPS management of the site would likely be minimal in comparison to other units of the national park system given the site's rural setting, potential visitation numbers, potential park management structure, the type of resources included in the potential park unit, and potential interpretation strategies.

Regardless of the potential site management and level of visitor opportunities available onsite, a few minimum required improvements may be needed to provide the level of resource protection and public enjoyment associated with a unit of the national park system. For the purposes of comparison, two site development scenarios are outlined below—one representing a lower level of site development and the other a higher level. Note that all construction costs are gross costs in 2017 dollars, derived either from the NPS Current Replacement Value (CRV) Calculator with the appropriate park location factor, or comparable region- or WASO-reviewed projects for existing park units that have been entered in the NPS Project Management Information System (PMIS) database. Total cost of facility ownership (TCFO) calculations, which include the one-time construction costs, annual maintenance costs, and the cost to replace subsystems or portions of the facility beyond regularly scheduled repairs over the course of a building's lifetime, are included in appendix F.

- a. Minimum required improvements (in either scenario). Minimum site improvements for access and resource protection would include the addition of a new accessible parking lot and bus pullout lane, a boundary fence, new standardized interpretive waysides and signage, and stabilization and protection of the foundations of three historic buildings now located under noncontributing log cabins. The minimum required improvements would cost approximately \$746,000.
- b. Lower development. A lower site development option could represent a primarily self-directed experience of the site with ranger-led activities offered during special events.

39. Sharon C. Park, NPS Preservation Brief 31: Mothballing Historic Buildings (US Department of Interior- National Park Service, September 1993), <https://www.nps.gov/tps/how-to-preserve/briefs/31-mothballing.htm>.

Site orientation and interpretation would be provided at an open-air kiosk with interpretive panels to provide historic context.

This option represents NPS investment in visitor facilities at the site but still results in less development than most existing units of the national park system. In addition to the minimum improvements above, likely improvements could include resurfacing the existing trail to meet accessibility standards and constructing a kiosk, a standalone restroom, and a water fountain. This scenario assumes that the existing shelter structure would be relocated and the Burdick House would be mothballed until an appropriate park use was identified for the building.<sup>40</sup> The cost of improvements described in this lower development scenario is approximately \$1.0 million, making a one-time construction total of approximately \$1.8 million in improvements. Annual operations, maintenance, and recapitalization costs associated with this development scenario are estimated at approximately \$72,000. These costs, which reflect staff time required to maintain the proposed facilities and cyclic maintenance projects, would be included under the potential national park service unit's annual operating budget.

- c. Higher development. A higher development scenario expands visitor opportunities at the site and adds a staffed visitor contact station similar to those seen in other small units of the national park system. In the higher development scenario, likely improvements could include redesigning the trail to standard and extending it to a ½-mile in length, constructing a small visitor contact station with modest exhibits, and relocating the existing shelter structure. For cost estimating purposes, this scenario also assumes that the Burdick House would be rehabilitated and expanded to support NPS operations.

The higher development scenario would cost approximately \$4 million, resulting in a one-time construction total of approximately \$4.8 million, when minimum required improvements are added. Annual operations, maintenance, and recapitalization costs associated with the higher development scenario are approximately \$168,000. Again, these costs would be included in New Philadelphia's annual NPS operating budget if it was designated a new unit of the national park system.

Note that the custody and storage of archeological resources related to the site is still to be determined. Currently, artifacts collected from the New Philadelphia site during archeological field schools are owned by the Illinois State Museum and stored in the Illinois State Museum Research and Collection Center in Springfield. It is not anticipated that a curatorial facility would be needed on-site, but during outreach activities, the public expressed a strong desire for some artifacts to be displayed at New Philadelphia. Under a lower development scenario, display cases appropriate for exhibiting select artifacts may be able to be incorporated into the information kiosk/shelter, depending on the structure's design. A staffed visitor contact station, which may fit in a higher development site improvement scenario, could include modest exhibit space for artifacts.

***Potential or known hazardous materials or contaminated areas***—There are no known hazardous materials or contaminated areas located within the New Philadelphia Townsite. Since Frank McWorter cleared the 42-acre parcel for platting and development, the area has served as farmland with limited ground disturbances. Historic, 19th-century businesses once located in New Philadelphia, including blacksmithing, may have used harmful materials, but there has been no such use at the site since the 1920s. A phase 1 environmental site assessment would be needed to identify potential or existing contamination liabilities as part of the National Park Service's environmental due diligence process before it could change ownership or be opened to the public as a unit of the national park system.

40. Cost of mothballing a structure assumed to be 15% of the cost to rehabilitate and maintain it (<https://www.nps.gov/tps/how-to-preserve/briefs/31-mothballing.htm> suggests 10% or higher as a guideline).

The Burdick House, built circa 1939, could potentially include lead and asbestos, hazardous materials commonly found in paint, tiling, and insulation during its period of construction. The house would need to be inspected and, if any of these materials were identified, properly abated before the house could be rehabilitated for public use or removed via relocation or demolition. Environmental mitigation measures and funding for abatement would need to be included in future projects addressing treatment of the Burdick House.

**Potential park planning efforts to determine future management direction**—Under direct NPS management, planning documents would need to be created to provide a cohesive vision for the future. A foundation document would build off the park’s establishing legislation to clarify park purpose, identify resources or values fundamental to the park, and express why the park’s resources are nationally significant and merit protection. Management and interpretive plans are often mentioned as high-priority needs for new units of the national park system. Baseline cultural resource documentation including an archeological overview and assessment and a historic structure report for the Burdick House would provide information needed to manage and protect New Philadelphia’s cultural resources. A vital sign baseline assessment would provide data needed for natural resource management planning. One-time non-facility costs associated with inventorying, documenting, and planning for resource management and visitor use at recently established national park system units ranged from \$1 million to \$1.7 million.

**Cost summary**—The estimated total annual operating cost is approximately \$500,000 under a shared management scenario and \$700,000 under a traditional NPS management scenario. Under a shared management and administration model, annual staffing costs are estimated under \$300,000 for less than 4 FTE, in comparison to \$500,000 for approximately 7 FTE under the traditional, higher annual operating cost estimate. Over a 50-year period, total operating costs of a New Philadelphia national park system unit is estimated to be in the range of approximately \$28 million to \$41 million (table 4).

**Table 4. Estimated Total Operating Costs of a New Philadelphia National Park System Unit.**

Long-term Costs*	Low Estimate	High Estimate
Annual Park Operating Cost	\$500,000	\$700,000
One-time construction costs	\$1,752,000	\$4,762,000
One-time non-facilities costs	\$1,000,000	\$1,700,000
<b>Total expenditure over 50 years</b>	<b>\$27,752,000</b>	<b>\$41,462,000</b>

\*All estimated costs are in 2017 dollars.

One-time construction costs for facility development at New Philadelphia range from approximately \$1.8 million under a lower development scenario that focuses on self-directed visitor experiences and mothballing of the Burdick House to \$4.8 million for a staffed visitor contact station and complete rehabilitation of the Burdick House for regular park or partner use. Facility cost estimates do not include curatorial storage or artifact preparation space, as there is potential for off-site collection storage through current partners or existing NPS curation facilities. One-time, non-facilities costs associated with establishing a new unit of the national park system could be expected to range from \$1 million to \$1.7 million depending on the documents necessary for proper resource management and visitor use guidance. Non-facilities costs would include planning documents related to general park management; resource inventory, documentation, and management; and visitor use, as well as environmental screening.

According to the NPS Parks Facility Management Division, the National Park Service’s total deferred maintenance was calculated to be \$11.604 billion at the end of fiscal year 2017.<sup>41</sup> This cost represents the backlog associated with road maintenance, water systems, buildings, campgrounds, trails, housing, waste water systems, dams, and utility systems.

41. National Park Service, “NPS Deferred Maintenance Reports,” accessed April 2018, <https://www.nps.gov/subjects/plandesignconstruct/defermain.htm>.

Aging infrastructure, buildings, and visitor facilities, many of which were constructed during the mid-twentieth century Mission 66 initiative, continue to deteriorate and needed repairs are postponed due to lack of funding or staffing.

As stated in chapter 3, the study finds that the study area does not meet criteria for inclusion in the national park system. While costs for development and long-term establishment of the site would be relatively small in comparison to larger, more developed units, they still represent a sizeable investment and long-term budgetary appropriations to an agency that is actively seeking ways to reduce backlog, park budgets, and staffing. Considering the current fiscal realities being faced by the agency, this special resource study concludes it would not be feasible to consider adding New Philadelphia as a new unit of the national park system at the present time; however, if Congress were to establish the New Philadelphia site as a new unit regardless of those findings, then there may be some strategies for efficient management (discussed above).

## IDENTIFICATION OF THE MOST EFFECTIVE AND EFFICIENT ALTERNATIVE

NPS *Management Policies* (2006) states:

*“Special resource studies will evaluate an appropriate range of management alternatives and will identify which alternative or combination of alternatives would, in the professional judgement of the Director, be most effective and efficient in protecting significant resources and providing opportunities for appropriate public enjoyment.”*

The National Park Service determines that the most effective and efficient management alternative is continued management by current nonfederal partners. Together, the New Philadelphia Association, the Archaeological Conservancy, and private landowners have protected New Philadelphia Townsite’s in situ archeological resources.

The association has successfully fundraised to purchase a large portion of the study area, has organized outreach and educational events, has competed for preservation grants, has promoted national recognition of the site through New Philadelphia’s designation as a national historic landmark and an Underground Railroad Network to Freedom site, and partnered with national museums and other organizations to share the New Philadelphia story with a national audience. The Association and the Archaeological Conservancy have worked together to further research and archeological surveys at the site. It is assumed that the current landowners will continue to work with NPS programs for technical assistance and grant opportunities.

Current management is providing appropriate public enjoyment of the site, and past efforts to preserve the site’s resources have been remarkably successful. The majority of the study area’s nationally significant cultural resources are in situ archeological resources that do not require additional active management at this time. If the current management entities no longer provide adequate resource protection or visitor access to the site in the future, the National Park Service could reconsider its evaluation of the need for direct NPS management and related site management alternatives.

While the New Philadelphia study area does not appear to meet special resource study criteria at this time, ultimately Congress determines whether to establish a new unit, regardless of study findings. The National Park Service recommends that the current owners and managers of the site continue their excellent resource and site stewardship. The New Philadelphia Association and Archaeological Conservancy can continue to take advantage of opportunities to partner with the National Park Service through the national historic landmark and Underground Railroad Network to Freedom programs, and seek out additional nonfederal partners for future programming and funding opportunities.

## CHAPTER 5: PUBLIC OUTREACH

### OVERVIEW OF PUBLIC OUTREACH

The National Parks Omnibus Management Act of 1998 requires that each special resource study “shall be prepared with appropriate opportunity for public involvement, including at least one public meeting in the vicinity of the study, and after reasonable efforts to notify potential affected landowners and State and local governments.”

The National Park Service made a diligent effort to engage interested and affected individuals, groups, and agencies during the preparation of this study. National Park Service personnel, in partnership with the New Philadelphia Association and other organizations, planned and conducted public outreach aimed at sharing information about the special resource study process and collecting information that would inform the findings of the study. The National Park Service solicited public input on a variety of topics, including current management of the study area and ideas for future resource protection and visitor enjoyment. This outreach also helped the National Park Service assess the level of local support for adding New Philadelphia to the national park system. Public outreach efforts conducted as part of this study are described below.

### NOTIFYING THE PUBLIC

The National Park Service announced opportunities to participate in the study in several different ways. In cooperation with the New Philadelphia Association, a project newsletter was mailed in April 2016 to adjacent landowners, neighbors, media outlets, and other interested parties. In addition, the Pike County Chamber of Commerce, the New Philadelphia Association, the Archaeological Conservancy, the *Herald-Whig* newspaper (Quincy, IL), and the *Two Rivers Outdoors* online publication posted this and other information about the study to their websites and social media pages. Partner organizations also contacted local media outlets to publicize planned events, including a site visit and public informational meeting (described below).

For example, New Philadelphia Association representatives participated in a local radio program on the day of the informational meeting, publicizing the meeting and inviting the general public to attend. The mailings and outreach efforts were meant to introduce the study, announce opportunities for involvement, and invite the public and interested parties to participate.

### SITE VISIT TO NEW PHILADELPHIA

On May 11, 2016, the National Park Service took part in a site visit of the study area. A variety of individuals and organizations took part in and supported this visit, including the New Philadelphia Association, researchers from the Illinois State Museum and University of Maryland, descendants of Frank McWorter, and a representative from US Representative Darin LaHood’s office. Students from Western High School in Barry led participants on walking tours through the New Philadelphia Townsite, pausing along the way at interpretive waysides and using iPads to highlight the “augmented reality tour” that interprets the layout and appearance of the town during the mid-19th century. Following the site visit, the tour continued to the Barry Museum and Barry Public Library.

A group of individuals visiting the study area.



The tour helped the National Park Service gain a more complete understanding of the site and surrounding area and also served as another opportunity to invite people to attend the informational meeting that evening.

## PUBLIC INFORMATIONAL MEETING

That same day, the National Park Service hosted an informational meeting from 6-8 p. m. in Pittsfield, Illinois. This meeting was designed to share information about the study and to gather the public's ideas through direct interaction between the public and NPS personnel. The meeting began with a series of presentations about the study process and the history of the site and McWorter family. Before the meeting closed, representatives of elected officials were invited to address the crowd. Representatives used this time to issue brief statements of support for the study and for the site becoming a unit of the national park system.

Facilitated listening sessions were a focus of the meeting. These sessions took place at designated listening stations. At each station, discussion centered on a different question that was designed to gather input for the study. NPS personnel facilitated the discussion and recorded notes.

The view inside the public informational meeting.



The National Park Service prepared posters, handouts, and other materials to support discussion at the meeting and made these materials available online at the NPS Planning, Environment and Public Comment (PEPC) website that had been established for the study ([https://parkplanning.nps.gov/new\\_philadelphia\\_special\\_resource\\_study](https://parkplanning.nps.gov/new_philadelphia_special_resource_study)).

Eighty-eight people signed in, though total attendance at the informational meeting was believed to total more than one hundred. Participants included local residents, members of the New Philadelphia Association and other partner organizations, and descendants of Frank McWorter who had traveled from as far away as Maryland, Oklahoma, and Texas. In addition, local journalists covered the meetings resulting in articles in two regional newspapers, the *Herald-Whig* and the *Jacksonville Journal Courier*. A member of the public also responded informally to the *Herald-Whig* article online.

## PUBLIC COMMENTS

Comments were solicited online and collected in person at the informational meeting. The National Park Service posted five questions to the project website:

1. Do you have any ideas about how best to preserve and interpret the resources of the New Philadelphia Townsite?
2. What kinds of experiences do you want to have at the New Philadelphia Townsite? What do you think would need to be done to facilitate these experiences?
3. How should we let people know about the site?
4. What role(s) should various organizations such as New Philadelphia Association, Archaeological Conservancy, Philadelphia Land Trust, and the National Park Service play in the future of the site?
5. Do you have other ideas or comments you would like to share with us?

These questions were presented on comment cards, in the project newsletter, and online at the project website.

During the informational meeting, NPS personnel facilitated listening sessions that centered on the first three of these questions. In addition, the planning team provided cards for attendees to post “other ideas or comments” at an unmanned station. In response, 30 individuals or organizations submitted 134 comments online at the project website. Additionally, 14 letters or articles of support were received from organizations such as the Archaeological Conservancy, City of Pittsfield, Pike and Scott County Farm Bureaus, *Herald-Whig* Newspaper, and the Society for Historical Archaeology. Additionally, Representative LaHood and US Representative Cheri Bustos wrote letters of support. Attendees at the informational meeting offered valuable comments, which NPS staff recorded on flip charts during the meetings and later incorporated into a meeting summary.

## What We Heard

The National Park Service received valuable comments that helped inform the special resource study findings. The summary below synthesizes comments submitted online, by mail and email, and in person during the May 2016 public informational meeting.

1. Do you have any ideas about how best to preserve and interpret the resources of the New Philadelphia Townsite?

At the public informational meeting and online, most respondents overwhelmingly supported NPS management to preserve and interpret the resources of the New Philadelphia Townsite for the long term. No one, online or in person, opposed NPS management or suggested another organization should preserve and/or interpret the site. Twenty-nine people responded online: of those, 10 recommended the site for inclusion in the national park system. Several suggested expanding the augmented reality tour and/or building a visitor center or museum on site, while a few suggested reconstructing the historic New Philadelphia village. Many emphasized that “the story is what’s important,” and efforts should be focused on sharing the story.

2. What kinds of experiences do you want to have at the New Philadelphia Townsite? What do you think would need to be done to facilitate these experiences?

At the public informational meeting and online, respondents supported some form of development of the site. Many suggested building a visitor center or museum, providing educational programs and guided tours, displaying artifacts on-site, and/or using technology to create a robust online presence and to expand the augmented reality tour presently in use. Commenters emphasized the site should explain “the many stories of New Philadelphia” including African-American history, the story of “Free Frank” and a multicultural community, the Underground Railroad, the importance of education to the town and founder, and the history of the enslaved and newly freed African Americans in Illinois.

3. How should we let people know about the site?

Nine of 27 online PEPC respondents suggested NPS management as a way to let people know about the site. Many suggested advertising (i. e., online, printed media, social media, signage, etc.). Others suggested making sure that New Philadelphia is represented in educational history textbooks, partnering with local museums, creating a documentary film, and a reality TV show on the history channel.

- 4-5. What role(s) should various organizations such as New Philadelphia Association, Archaeological Conservancy, Philadelphia Land Trust, and the National Park Service play in the future of the site? Do you have other ideas or comments you would like to share with us?

Everyone who spoke during the listening session supported NPS management of the New Philadelphia Townsite. Participants repeatedly stated that the National Park Service was the only organization with the capacity, skill, and ability to protect, interpret, and manage the site. Several people expressed concern the New Philadelphia Association and the other organizations currently involved would not be able to provide resource protection or high quality interpretation over the long term.

Comments recorded online were very similar. Some participants suggested joining the Abraham Lincoln National Heritage Area to improve public awareness and taking advantage of state and local programs for volunteer and financial support. They suggested the organizations currently involved in the site's management could serve as consultants and assist the National Park Service where possible. During the public meeting, one participant expressed concern that taxes would be raised to pay for New Philadelphia Townsite if the site were to become a unit of the national park system. Other participants responded that additional tax revenue generated by the site would offset any tax increase.

There was a strong public perception the site would be a significant economic driver for the area. Nearby landowners expressed support for the New Philadelphia Townsite becoming a unit of the national park system. However, one adjacent landowner, whose property includes certain related sites, expressed concern that the federal government would take his property through eminent domain. That landowner repeatedly expressed that he had no interest in selling his land.

In addition to this summary, a compilation of the individual comments received during the informational meeting and through the project website is included as appendix E in this study.

## **APPENDIXES, BIBLIOGRAPHY, AND STUDY TEAM**

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## APPENDIX A: LEGISLATION FOR THE NEW PHILADELPHIA SPECIAL RESOURCE STUDY PUBLIC LAW (PL 113-291)

### 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 archeological 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 the describes—

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

(2) any applicable recommendations of the Secretary.

## APPENDIX B: LEGISLATION FOR THE NEW PHILADELPHIA NATIONAL HISTORIC SITE (PL 117-328)

### TITLE VI—NATIONAL PARK SERVICE PROVISIONS

#### Subtitle A—Additions to the National Park System

##### SEC. 601. NEW PHILADELPHIA NATIONAL HISTORIC SITE.

(a) DEFINITIONS.—In this section:

(1) HISTORIC SITE.—The term “historic site” means the New Philadelphia National Historic Site established by subsection (b)(1).

(2) STATE.—The term “State” means the State of Illinois.

(b) ESTABLISHMENT OF NEW PHILADELPHIA NATIONAL HISTORIC SITE.—

(1) ESTABLISHMENT.—There is established in the State as a unit of the National Park System the New Philadelphia National Historic Site.

(2) PURPOSE.—The purpose of the historic site is to protect, preserve, and interpret the historic resources associated with the town of New Philadelphia, the first town in the United States planned and legally registered by a free African American before the Civil War.

(3) BOUNDARY.—The historic site shall consist of the approximately 124.33 acres of land within the boundary generally depicted as “Proposed Boundary” on the map prepared by the National Park Service entitled “New Philadelphia National Historic Site Proposed Boundary”, numbered 591/176,516, and dated July 2021.

(c) ADMINISTRATION.—

(1) IN GENERAL.—The Secretary shall administer land within the boundary of the historic site in accordance with—

(A) this section; and

(B) the laws generally applicable to units of the National Park System, including—

(i) section 100101(a), chapter 1003, and sections 100751(a), 100752, 100753, and 102101 of title 54, United States Code; and

(ii) chapter 3201 of title 54, United States Code.

(2) COOPERATIVE AGREEMENTS.—

136 STAT. 5602

PUBLIC LAW 117-328—DEC. 29, 2022

(A) IN GENERAL.—The Secretary may enter into cooperative agreements with the State or other public and private entities—

(i) to coordinate preservation and interpretation activities within the historic site; and

(ii) to identify, interpret, and provide assistance for the preservation and interpretation of non-Federal land within the boundary of the historic site and at sites in close proximity to the historic site that are located outside the boundary of the historic site.

(B) PUBLIC ACCESS.—Any cooperative agreement entered into under subparagraph (A) to provide assistance to non-Federal land shall provide for reasonable public access to the non-Federal land.

(3) ACQUISITION OF LAND.—

(A) IN GENERAL.—Subject to subparagraph (B), the Secretary may acquire land and interests in land for inclusion in the historic site by—

(i) donation;

(ii) purchase with donated or appropriated funds;

or

(iii) exchange.

(B) LIMITATION.—Any land owned by the State or a political subdivision of the State may be acquired for inclusion in the historic site only by donation.

(4) TECHNICAL AND PRESERVATION ASSISTANCE.—The Secretary may provide public interpretation and technical assistance for the preservation of historic structures of, the maintenance of the cultural landscape of, and local preservation planning for, related historic and cultural resources within the boundaries of the historic site.

Deadline.

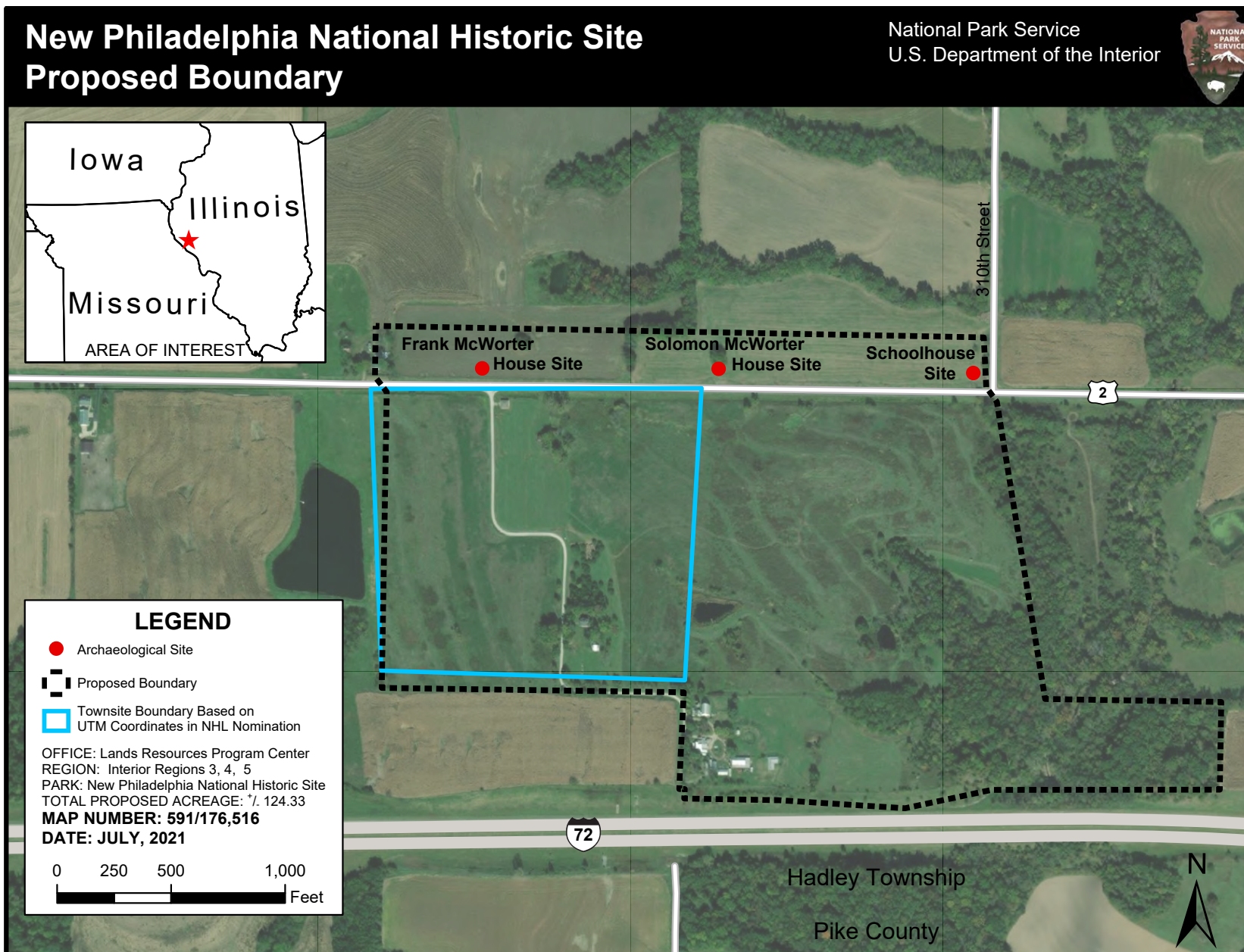
(5) MANAGEMENT PLAN.—Not later than 3 fiscal years after the date on which funds are first made available to carry out this section, the Secretary, in consultation with the State, shall complete a general management plan for the historic site in accordance with—

(A) section 100502 of title 54, United States Code;

and

(B) any other applicable laws.

Map 8. New Philadelphia National Historic Site Proposed Boundary.



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## APPENDIX C: NPS MANAGEMENT POLICIES CRITERIA FOR INCLUSION

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### 1.3 CRITERIA FOR INCLUSION

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Congress declared in the National Park System General Authorities Act of 1970 that areas comprising the national park system are cumulative expressions of a single national heritage. Potential additions to the national park system should therefore contribute in their own special way to a system that fully represents the broad spectrum of natural and cultural resources that characterize our nation. 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. Several laws outline criteria for units of the national park system and for additions to the National Wild and Scenic Rivers System and the National Trails System.

To receive a favorable recommendation from the Service, a proposed addition to the national park system must

(1) possess nationally significant natural or cultural resources, (2) be a suitable addition to the system, (3) be a feasible addition to the system, and (4) require direct NPS management instead of protection by other public agencies or the private sector. These criteria are designed to ensure that the national park system includes only the most outstanding examples of the nation's natural and cultural resources. These criteria also recognize that there are other management alternatives for preserving the nation's outstanding resources.

#### 1.3.1 National Significance

NPS professionals, in consultation with subject-matter experts, scholars, and scientists, will determine whether a resource is nationally significant. An area will be considered nationally significant if it meets all of the following criteria:

- It is an outstanding example of a particular type of resource.

- It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage.
- It offers superlative opportunities for public enjoyment or for scientific study.
- It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.

National significance for cultural resources will be evaluated by applying the national historic landmarks criteria contained in 36 CFR Part 65 (*Code of Federal Regulations*).

#### 1.3.2 Suitability

An 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 on a case-by-case basis by comparing the potential addition 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. The comparative analysis also addresses 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 proposed new area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas.

#### 1.3.3 Feasibility

To be feasible as a new unit of the national park system, an area must be

(1) of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries), and (2) capable of efficient administration by the Service at a reasonable cost.

In evaluating feasibility, the Service considers a variety of factors for a study area, such as the following:

- size
- boundary configurations
- current and potential uses of the study area and surrounding lands
- landownership patterns
- public enjoyment potential
- costs associated with acquisition, development, restoration, and operation
- access
- current and potential threats to the resources
- existing degradation of resources
- staffing requirements
- local planning and zoning
- the level of local and general public support (including landowners)
- the economic/socioeconomic impacts of designation as a unit of the national park system

The feasibility evaluation also considers the ability of the National Park Service to undertake new management responsibilities in light of current and projected availability of funding and personnel.

An overall evaluation of feasibility will be made after taking into account all of the above factors. However, evaluations may sometimes identify concerns or conditions, rather than simply reach a yes or no conclusion. For example, some new areas may be feasible additions to the national park system only if landowners are willing to sell, or the boundary encompasses specific areas necessary for visitor access, or state or local governments will provide appropriate assurances that adjacent land uses will remain compatible with the study area's resources and values.

### 1.3.4 Direct NPS Management

There are many excellent examples of the successful management of important natural and cultural resources by other public agencies, private conservation organizations, and individuals. The National Park Service applauds these accomplishments and actively encourages the expansion of conservation activities by state, local, and private entities and by other federal agencies. Unless direct NPS management of a studied area is identified as the clearly superior alternative, the Service will recommend that one or more of these other entities assume a lead management role, and that the area not receive national park system status.

Studies will evaluate an appropriate range of management alternatives and will identify which alternative or combination of alternatives would, in the professional judgment of the Director, be most effective and efficient in protecting significant resources and providing opportunities for appropriate public enjoyment. Alternatives for NPS management will not be developed for study areas that fail to meet any one of the four criteria for inclusion listed in section 1.3.

In cases where a study area's resources meet criteria for national significance but do not meet other criteria for inclusion in the national park system, the Service may instead recommend an alternative status, such as "affiliated area." To be eligible for affiliated area status, the area's resources must (1) meet the same standards for 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; and (4) be assured of sustained resource protection, as documented in a formal agreement between the Service and the nonfederal management entity. Designation as a "heritage area" is another option that may be recommended. Heritage areas have a nationally important, distinctive assemblage of resources that is best managed for conservation, recreation, education, and continued use through partnerships among public and private entities at the local or regional level. Either of these two alternatives (and others as well) would recognize an area's importance to the nation without requiring or implying management by the National Park Service.

## APPENDIX D: CATEGORICAL EXCLUSION FORM



National Park Service  
U.S. Department of the Interior

Midwest Regional Office  
Date: 12/14/2016

### Categorical Exclusion Form

**Project:** New Philadelphia Special Resource Study

**PEPC Project Number:** 64435

**Description of Action (Project Description):**

The National Park Service (NPS) is conducting a special resource study of the New Philadelphia town site in the State of Illinois. The purpose of the study, as directed by Congress, is to evaluate the national significance of the site, and the suitability and feasibility of adding it to the national park system. In addition, Congress charges the Secretary of Interior to consider alternatives for the preservation, protection and interpretation of the New Philadelphia town site by Federal, State or local government entities or any other interested individuals. These alternatives may encourage partnerships and other efforts to protect the New Philadelphia town site by means that do not necessarily require direct NPS management.

**Project Locations:**

**Location**

<b>County:</b>	Pike	<b>State:</b>	IL
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**Mitigation(s):**

- No mitigations identified.

**CE Citation:** *Guidelines for Special Resource Studies; NPS NEPA Handbook 3.2 (R)*

**CE Justification:** The adoption or approval of this special resource study will result in recommendations or proposed actions which would cause no environmental impact. This CE holds implications for future NPS actions, but it will not result in environmental impacts unless Congress acts and creates a national park site at the New Philadelphia town site.

**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 13007)?	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 E: COMPILATION OF PUBLIC COMMENTS

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The following is a summary of comments received during the public informational meeting and from the project (PEPC) website. All comments were tabulated by topic. The numbers represent how many times this sentiment was recorded in the flip-charts at the informational meeting or in comments submitted on the website.

**Question:** *Do you have any ideas about how best to preserve and interpret the resources of the New Philadelphia Townsite?*

### Notes recorded from the informational meeting on flip-charts

- Include the New Philadelphia Townsite within the national park system (10)
- Focus on the story (9)
- Expand augmented reality tour (7)
- Put artifacts on display (4)
- Interpret archeology/expose for public view excavated sites (3)
- Digitize documents, images, and artifacts and make them accessible to the public (2)
- Continue archeology
- Build a visitor center or museum
- Use story boards/waysides
- Use farming to interpret the story
- Make minimal changes to the site
- State government does not have capacity to assume preservation/interpretation duties
- Tap into Abraham Lincoln National Heritage Area and Hannibal, Missouri to Springfield, Illinois corridor
- Hold annual events at the site including:
  - Underground Railroad
  - Lecture series
  - Coordinate with local events like the Barry Apple Festival

### A summary of notes recorded online in PEPC (29 respondents)

- Include in the national park system (10)
- Build a visitor center or museum (6)
- Reconstruct the village (2)
- Provide guided tours at the site
- Use story boards/waysides (4)
- Use historical videos, videos of descendants, videos of archeology at the site (2)
- Build on research and work that has already been done (3)
- Expand the augmented reality tour (3)
- Hold historically linked arts events
- Continue archeology
- Eliminate ground disturbance where possible
- Tell a broad range of stories including:
  - Stories of people who lived at New Philadelphia.
  - Nation's story of slavery (2)
  - Underground Railroad
  - Slaves obtaining their freedom
  - The history New Philadelphia Townsite as it relates to the history of Illinois (3)
  - The history of Frank McWorter from South Carolina to Kentucky to Illinois (2)
  - Contemporary voices from descendants

**Question:** *What kinds of experiences do you want to have at the New Philadelphia Townsite? What do you think would need to be done to facilitate these experiences?*

**Notes recorded from the public informational meeting on flip-charts**

- Build visitor center or museum (include gift shop) (3)
- Provide youth programs (3)
- Provide orientation film (2)
- Living history interpreters (2)
- Provide guided and self-guided tours
- Use technology to tell the story
- Display artifacts at site
- Recreate town layout (plat map)
- Build ghost structures
- Reconstruct townsite
- Use diorama (instead of reconstructions)
- Use Townsite imagery – LiDAR, aerials
- Create multigenerational volunteer program
- Build on research and work that has already been done
- Use the following to tell the story:
  - Agriculture (2)
  - Archeology
  - Culinary
  - Heritage Crafts
- Site should explain:
  - African-American history especially as it relates to Illinois (3)
  - Story of Free Frank and multicultural community (2)
  - Struggles/history of early New Philadelphia settlers (2)
  - New Philadelphia history/connection to nearby communities
  - Underground Railroad
  - Lincoln ideals to Washington/the nation

**Notes recorded online in PEPC (29 respondents)**

- Build a visitor center/museum (5)
- Provide educational programs/ guided tours (5)
- Reconstruct the town (2)
- Display artifacts on site
- Display a life size statue of the founder
- Create interactive and outdoor facilities (2)
- Create online presence
- Reveal areas of excavation (cover with Plexiglas so visitors can see past archeology)
- Do not reconstruct buildings (use virtual reality, outline buildings on the ground, and/or create ghost structures) (2)
- Continue archeological excavations
- Provide orientation films (3)
- Build on research and work that has already been done
- Site should explain:
  - History of the enslaved/newly freed
  - Why uncovering social history of disenfranchised people is so challenging
  - Timeline of Frank McWorter's life
  - Focus on the importance of the story
  - Importance of education to founder/town/community
  - Tell the story of black history
  - Slavery
  - Underground Railroad sites and Lincoln sites in the New Philadelphia area
  - Make story relevant today— link to contemporary life

**Question:** *How should we let people know about the site?*

**Notes recorded online in PEPC  
(27 respondents)**

- List as a National Park Service site (9)
- Provide online interpretative and information center (3)
- Advertise (online, printed media, road signs, and social media, etc. ) (9)
- Host field trips/provide education opportunities (6)
- Partner with museums to promote the site (2)
- Add it to the history books; increase the use of the NPS Teaching with Historic Places teaching plan on the internet (2)
- Conduct podcast interviews with key people (descendants, researchers, managers, race and history thinkers, etc. )
- Create a documentary film for public broadcast
- Use NPS media outlets (3)
- Use state tourism bureau (4)
- Tie the story to the Civil War, Underground Railroad, Lincoln, and other related sites (2)
- Create a reality show on the history channel
- Conduct outreach to the local community

**Question:** *What role(s) should various organizations such as New Philadelphia Association, Archaeological Conservancy, Philadelphia Land Trust, and the National Park Service play in the future of the site? Do you have other ideas or comments you would like to share with us?*

**Notes recorded from the informational meeting on flip-charts**

- Only the National Park Service has the capacity/skill/ability to manage (10)
- Join Abraham Lincoln National Heritage Area to improve public awareness and tap into tourism corridor from Springfield Illinois to Hannibal Missouri (2)
- Explore state supported programs for staff and financial support (2)
- Organizations currently involved should serve as consultants
- Organize youth
- Continue additional archeology via partnerships with universities
- State does not have capacity to assume the site
- Create a culture of volunteerism to provide staff support
- Partner with outside groups (African American, historical society, business community)
- Continue to seek sponsorships to raise revenue
- Concern was raised that taxes would be increased to pay for improvements at New Philadelphia Townsite.
  - Participants responded additional tax revenue generated by the site would offset any increase.
  - There was a strong public perception the site would be a significant economic driver for the area.
- The owners of one property adjacent to the New Philadelphia Townsite were supportive of the site becoming a unit of the national park system but expressed concern that the federal government might take their property through eminent domain. They expressed several times that they had no interest in selling their land.

**Notes recorded online in PEPC  
(50 respondents)**

- Include in the national park system (25)
- Involve stakeholders in future research designs and goals, interpretation, developing visitor materials, as well as fundraising (12)
- The National Park Service should build upon research already done (3)
- Incorporate descendants' voices into interpretation of the site (3)
- Create online presence for those that do not visit (3)
- Conduct living history events (2)
- Include many perspectives in developing and telling the story of New Philadelphia
- Make New Philadelphia part of education curricula; partner with schools and museums; provide tours of the site
- Use volunteers to maintain the site and participate in various programs
- NPS ownership and stewardship is key to preserving the site; work with universities to provide ongoing educational and research programs

## APPENDIX F: COST ESTIMATES SUPPORTING INFORMATION

This information supported the discussion of costs associated with acquisition, feasibility, and operations under the evaluation factor of feasibility and estimated costs associated with direct NPS management as a new unit of the national park system.

**Table E.1. Annual Operating Costs at Comparable Units of the National Park System.\***

Unit of the National Park System	FY 2015 Annual Operating Costs
River Raisin National Battlefield Park, Michigan	\$604,000
Nicodemus National Historic Site, Kansas	\$676,000
Fort Union Trading Post National Historic Site, North Dakota	\$817,000
Knife River Indian Villages National Historic Site, North Dakota	\$870,000
Lincoln Boyhood National Memorial, Indiana	\$1,036,000
Pipestone National Monument, Minnesota	\$1,101,000
Homestead National Monument of America, Nebraska	\$1,259,000

\*Based on 2015 NPS Operations Summaries included in FY17 Green Book.

**Table E.2. Full Time Equivalent Staff at Comparable Units of the National Park System.\***

Unit of the National Park System	FY 2015 Total FTE
River Raisin National Battlefield Park, Michigan	7
Nicodemus National Historic Site, Kansas	6
Fort Union Trading Post National Historic Site, North Dakota	8
Knife River Indian Villages National Historic Site, North Dakota	10
Lincoln Boyhood National Memorial, Indiana	13
Pipestone National Monument, Minnesota	11
Homestead National Monument of America, Nebraska	15

\*Based on 2015 NPS Operations Summaries included in FY17 Green Book.

### BURDICK HOUSE REHABILITATION COST ESTIMATE INFORMATION

A detailed cost estimate has not been prepared for any treatment option for the historic structures within the study area. New Philadelphia Association provided the study team with a preliminary cost estimate for converting the Burdick House into a research bunkhouse that was prepared by a contractor at the association's request in 2012. The \$300,000 estimate was based on the assumption that the building would occasionally be used by a small number of researchers and did not include additional costs related to increasing accessibility to meet federal regulations, documentation, and compliance activities required for federal undertakings, and the potential mitigation of hazardous historic building materials.

During the NPS study team site visit in May 2016, a Lincoln Home National Historic Site employee with experience in 19th-century residential building rehabilitation and maintenance commented that rehabilitation of the Burdick House for public use as a NPS visitor facility could cost between \$2.5 million or more. This informal estimate was based on the current condition of Burdick House electrical system, sewer system upgrades necessary to handle regular visitation, HVAC installation, hazardous material abatement, and projects that would bring the building up to federal accessibility standards.

Approximate cost of rehabilitating the Burdick House for visitor contact and researcher housing can also be estimated by comparing with comparable projects at other NPS units. An order of magnitude estimate considers information about the size of the Burdick House (as provided by the New Philadelphia Association) and analogous rehabilitation projects at other units of the national park system. Appomattox Courthouse National Historic Site project PMIS #183763, a comparable rehabilitation project recorded in the NPS Project Management Information System (PMIS), was costed at \$190/square foot (sf). At approximately 3,100 sf, similar rehabilitation of the Burdick House is estimated to be \$589,000.

The costs associated with development under direct NPS management included in chapter 4 rely on this range of preliminary cost estimates.

Under the lower development scenario, the cost of mothballing the house was calculated as 15% of the approximate \$589,000 cost of rehabilitation, or \$88,000, according to the order of magnitude estimate based on previous NPS projects. Under the higher development scenario, the cost for rehabilitation of the Burdick House for regular public use as an NPS visitor contact station was estimated to be the higher estimate of \$2.5 million to illustrate a broader range of potential development costs.

The Total Cost of Facility Ownership (table E.3) for the New Philadelphia site consists of the following costs:

- Initial construction/rehabilitation costs.
- 50 years of annual operations and maintenance. These costs are derived from NPS Park Asset Management Plans for comparable assets, or in the case of the Burdick House and visitor contact station, from the NPS Park Facility Management Division (PFMD) TCFO Calculator.
- A 1% of current replacement value (CRV) allowance for recapitalization needs.

Discounted by the rate prescribed by the Office of Management and Budget (OMB) for a 50-year analysis period, the lower development scenario has a net present value of \$4.8 million, while the higher development scenario with the Burdick House converted to a visitor contact station has a net present value of \$11.8 million.

**Table E.3. Total Cost of Facility Ownership Calculations.**

Scenario	Construction (One Time)	O&M and Recapitalization (Annual) O&M	Total Cost of Facilities Ownership (50 Year)	Net Present Value (50 Year)
Lower Development Scenario	\$1,752,000	\$72,000	\$5,341,000	\$4,771,000
Higher Development Scenario	\$2,851,000	\$153,000	\$10,504,000	\$9,290,000
Higher Development Scenario (with Burdick House as VC Station)	\$4,762,000	\$168,000	\$13,163,000	\$11,830,000

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## STUDY TEAM

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### **National Park Service, Denver Service Center**

Mindy Burke, Contract Editor (former)

Suzanne Digre, Contract Editor

Tom Gibney, Project Manager /  
Landscape Architect

John Paul Jones, Visual Information Specialist

Wes Mize, Cultural Resource Specialist

Charles Notzon, Economist (former)

Tara Pettit, Project Manager / Cultural  
Resources Specialist (former)

Hilary Retseck, Cultural Resource Specialist

Jennifer Stein, Visitor Use Management  
Specialist (former)

### **National Park Service, Interior Regions 3, 4, 5**

Tokey Boswell, Chief, Planning and  
Compliance Division

Deanda Johnson, Coordinator, Underground  
Railroad Network to Freedom

### **National Park Service, Park Planning and Special Studies Division, Washington Office**

Whitney Boone, Program Analyst

Patrick Gregerson, Chief of Planning (former)

Thomas Sheffer, Program Analyst

### **Lincoln Home National Historic Site**

Dale Phillips, Superintendent (former)

Tim Townsend, Historian

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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 historic 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.

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