

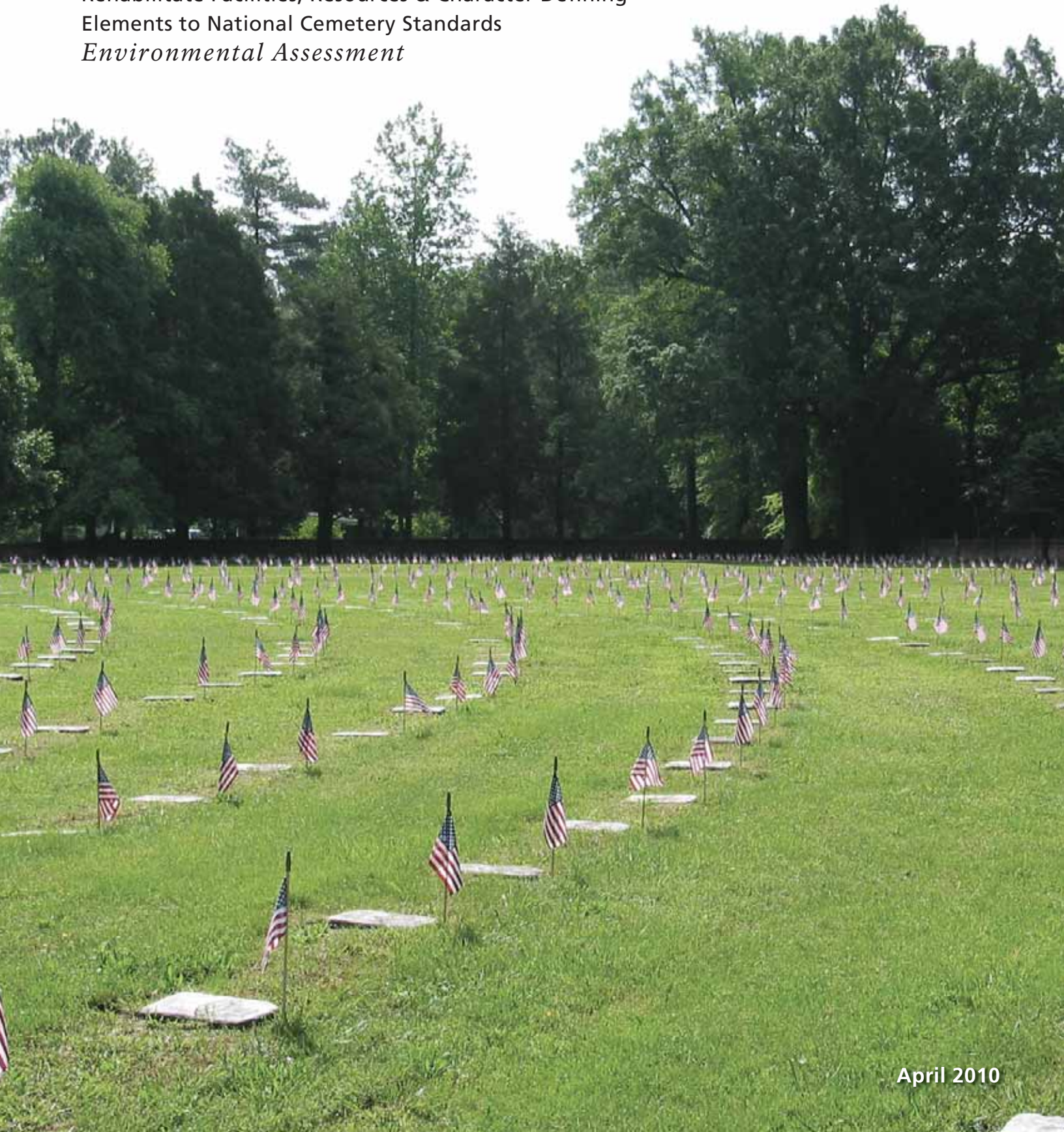


# Poplar Grove National Cemetery

Rehabilitate Facilities, Resources & Character Defining

Elements to National Cemetery Standards

*Environmental Assessment*





**U.S. Department of the Interior  
National Park Service**

**Poplar Grove National Cemetery  
Petersburg National Battlefield  
Dinwiddie County, Virginia**

**Rehabilitate Facilities, Resources & Character Defining Elements to National Cemetery Standards  
Environmental Assessment**

**April 2010**

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**Proposed Action:** Poplar Grove National Cemetery (the cemetery), part of Petersburg National Battlefield (NB), is one of 14 national cemeteries under the stewardship of the National Park Service (NPS). The cemetery was established in 1866 and contains the remains of over 6,100 Union soldiers from the Civil War battlefields in and around Petersburg and nine surrounding counties throughout Central Virginia. Petersburg NB was established in 1926 as a national military park. Administration of the cemetery, together with Petersburg NB, was transferred from the U.S. War Department to the NPS on August 10, 1933. The upright headstones were cut and set flush with the ground and the block markers for unknown graves were lowered in February and March of 1934, after the period of U.S. War Department administration. This was done to ease maintenance requirements. Since the U.S. War Department transferred administration of the cemetery to the NPS in 1933, the landscape of the cemetery has undergone numerous changes that have altered its historic character and visual relationship to the historic national cemetery system. The NPS proposes to return the cemetery landscape to its historic character to once again provide due honor and respect to those who gave their lives in service to the country. Actions needed to achieve this goal include installation of new upright headstones in the style appropriate to the original burial era at all graves, with the exception of the private and possibly some of the nonstandard markers; resurfacing the cemetery approach road; vegetation management; relocating the parking lot and other infrastructure; repairing the cemetery wall, including drainage features; adding signs and monuments; improving the lodge, restroom building, and the rostrum. Implementing the NPS Preferred Alternative would result in minor, short-term, adverse impacts on visitor use and experience and operations and infrastructure; minor, long-term, adverse and long-term, beneficial impacts on archeological resources; and long-term, beneficial impacts on cultural landscapes, historic structures, visitor use and experience, and operations and infrastructure.

**For Further Information Contact:** Superintendent, Petersburg National Battlefield, (804) 732-3571

**Note to Reviewers and Respondents:**

If you wish to comment on this Environmental Assessment, you may mail comments by May 19, 2010 to the name and address below or you may post them electronically at <<http://parkplanning.nps.gov/pete>>. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Petersburg National Battlefield Headquarters  
1539 Hickory Hill Road  
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# ACRONYMS AND ABBREVIATIONS

**the cemetery** – Poplar Grove National Cemetery  
**CEQ** – Council on Environmental Quality  
**CLR** – cultural landscape report  
**DO** – Director’s Order  
**EA** – environmental assessment  
**EPA** – Environmental Protection Agency  
**GMP/EIS** – general management plan/environmental impact statement  
**GPR** – ground penetrating radar  
**the lodge** – the Poplar Grove National Cemetery Superintendent’s Lodge  
**National Register** – National Register of Historic Places  
**NCA** – National Cemetery Administration  
**NEPA** – National Environmental Policy Act  
**NPS** – National Park Service  
**Petersburg NB** – Petersburg National Battlefield  
**SHPO** – state historic preservation officer



# 1

## **INTRODUCTION: PURPOSE AND NEED**

Located within the boundaries of Petersburg National Battlefield (Petersburg NB), Poplar Grove National Cemetery (the cemetery) is one of 14 national cemeteries under the stewardship of the National Park Service (NPS). The cemetery contains the remains of over 6,100 Union soldiers from the Civil War battlefields in and around Petersburg and nine surrounding counties throughout Central Virginia. The cemetery was established in 1866, while Petersburg NB was established in 1926 as a national military park. Administration of the cemetery, together with Petersburg NB, was transferred from the U.S. War Department to the NPS on August 10, 1933. The 2,105 upright headstones were cut and set flush with the ground and the 3,277 blocks marking unknown soldiers were lowered in February and March of 1934 after the period of U.S. War Department administration. This was done to ease the maintenance requirements. Since the U.S. War Department transferred administration of the cemetery to the NPS in 1933, the landscape of the cemetery has undergone numerous changes that have altered its historic character and visual relationship to the historic national cemetery system. The NPS proposes to return the cemetery landscape to its historic character to once again provide due honor and respect to those who gave their lives in service to the country. Actions needed to achieve this goal include installation of new upright headstones in the style appropriate to the original burial era at all graves, with the exception of the private and possibly some of the nonstandard markers.

This Environmental Assessment (EA) evaluates two alternatives, a no-action alternative and the NPS Preferred Alternative. The EA further analyzes the potential impacts these alternatives would have on the natural, cultural, and human environment. This document has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended; regulations of the Council on Environmental Quality (CEQ) (40 CFR 1508.9); and NPS Director's Order (DO) 12: Conservation Planning, Environmental Impact Analysis, and Decision-Making. Because the NPS has determined that the rehabilitation of the cemetery is a complex undertaking that may be completed in stages and has the potential to adversely affect historic properties, compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f) is addressed through a programmatic agreement among the NPS and the Virginia State Historic Preservation Office (SHPO). A copy of this draft agreement is included in Appendix A for review and comment.

## **PURPOSE AND NEED FOR ACTION**

The purpose of the proposed action is to remove the conditions that hinder the ability to access, understand, and reverently commemorate the cemetery as the final resting place for those soldiers that died during the Petersburg and Appomattox Campaigns of the Civil War. The cemetery is the site of over 6,100 graves of Union Army soldiers who fought and died in some of the most historic and tragic battles of the Civil War. Since the end of the war, the cemetery has been passed from the U.S. War Department to the NPS. During this time, changes have been made that no longer reflect the appropriate appearance and respect a national cemetery is granted.

Currently, the grave markers (including headstones and numbered blocks for unknown soldiers), as well as the overall landscape within the cemetery, prevent a true understanding and respect for the cemetery and the soldiers that are buried there. In order to rehabilitate the cemetery, the headstones should be upright and the landscape improved. Upright headstones would provide the appropriate respect to the men buried in the cemetery.

In addition, access to the cemetery does not reflect its history or importance. In order to provide appropriate access to the cemetery, the approach road leading to the cemetery should be rehabilitated and the parking lot should be relocated to provide a more commemorative setting that separates the cemetery from the surrounding developed community. These changes should be made in accordance with the standards and requirements of a national cemetery within the national park system.

Within the cemetery, signs and opportunities for visitor contact are limited. During peak seasons, the NPS is able to provide staff in the cemetery's superintendent lodge (the lodge) to answer questions and direct visitors through the cemetery; however, the structure does not support full year-round visitor services. When staff is not available, visitors must walk through the cemetery uncertain of the location of specific grave sites, the relevance of historic structures, or the best means to move through the cemetery. In order to enhance visitor use and experience at the cemetery, there is a need to improve interpretation and wayfinding signs and provide an understanding of the appropriate movement through the cemetery.

There also is a need to address aging infrastructure within the cemetery. The drainage systems within the cemetery wall do not provide appropriate removal of stormwater due to eroding conditions around the wall. After heavy rains, portions of the cemetery are partially submerged. Standing water also further damages the wall, resulting in increased growth of moss and deteriorating masonry. In order to improve these conditions, changes should be made to improve the movement of water through the drain pipes in the cemetery wall. In addition, the existing septic system is located within the cemetery and was installed in 1974 to support a single-family residence. This is no longer adequate to support visitor use at the site.

## **PROJECT AREA DESCRIPTION**

### **GENERAL PARK LOCATION**

Located in south central Virginia, Petersburg NB is situated 20 miles south of Richmond and 50 miles north of the Virginia/North Carolina border. The park creates a semicircle east, south, and west of the city of Petersburg and maintains six separate units each representing distinct events centered on the Civil War (Figure 1). These units include Poplar Grove National Cemetery, Grant's Headquarters at City Point, the Eastern Front, the Five Forks Battlefield, the Homefront, and the Western Front.

### **POPLAR GROVE NATIONAL CEMETERY**

The cemetery is located 5 miles south of Petersburg in Dinwiddie County, Virginia. The 8-acre cemetery, which is surrounded by an additional 4 acres of NPS property, is located in a transitional rural-suburban setting, surrounded by pine woods, farm fields, and suburban houses. Access to the cemetery is provided by a narrow, tree-lined approach road that connects to Vaughan Road. This intersection with Vaughan Road is approximately 0.5 miles south of Petersburg NB's Siege Line Tour along Flank Road (Figure 2).

Within the cemetery grounds, the approach road ends at a small parking lot. The cemetery's asphalt parking lot is unmarked but provides enough space for 6-8 vehicles, with additional room for a bus or trailer along its wooded edge. The parking lot is bordered to the west by a wooded lot that screens it from Vaughan Road and to the east by a farm (Figure 2). There is a small, private cemetery located along the edge of the farm property. The project area for the proposed action includes the cemetery approach road and parking lot, the wooded area immediately surrounding these structures, the cemetery wall, and all of the natural and historic resources within the cemetery walls (Figure 2).

## **HISTORY AND SIGNIFICANCE OF POPLAR GROVE NATIONAL CEMETERY**

### **PETERSBURG NATIONAL BATTLEFIELD**

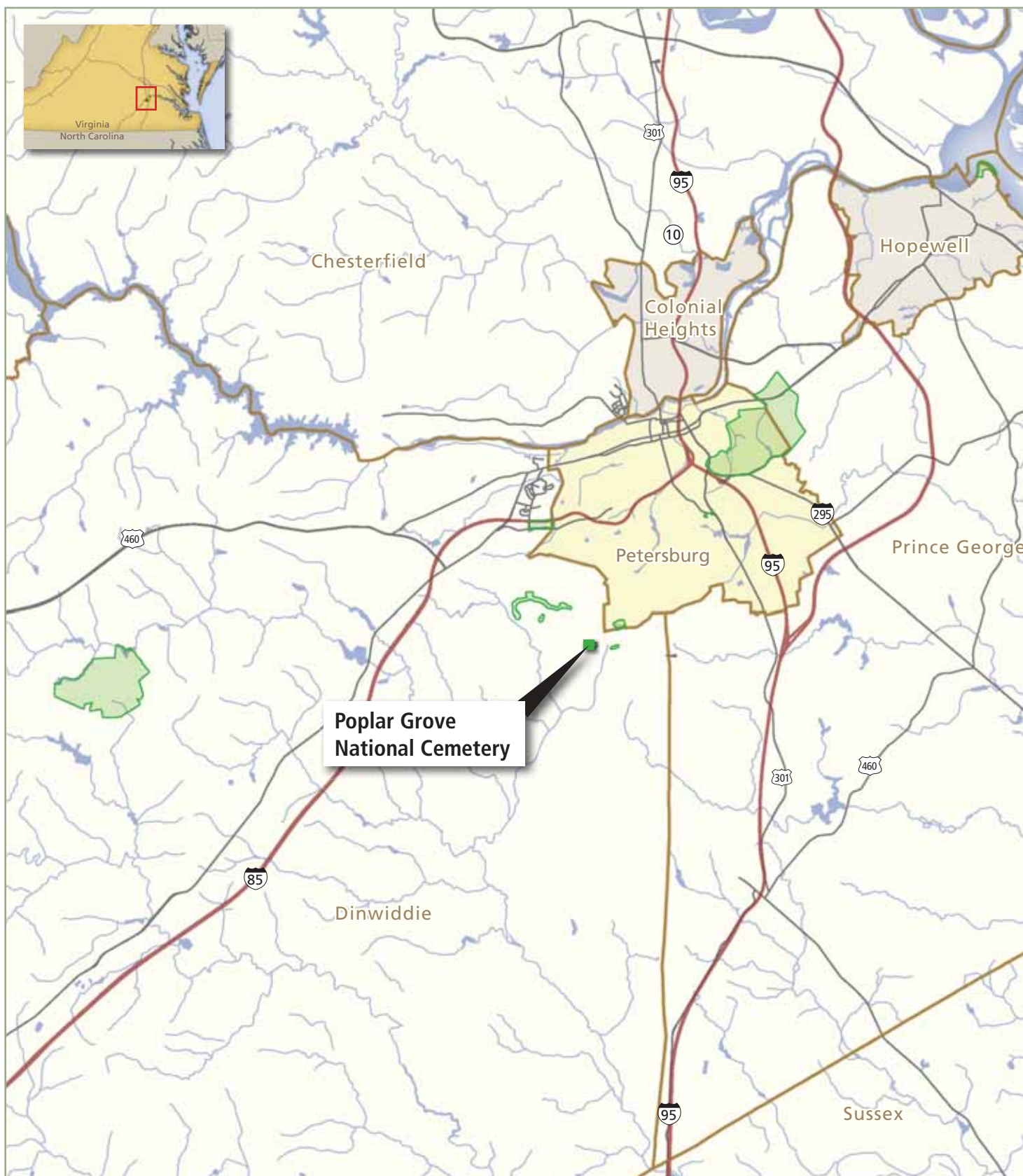
In 1926, Congress recognized the importance of preserving 6 of the 108 battlefields of the Petersburg Campaign. To aid in that preservation effort, Congress established the Petersburg National Military Park, "... in order to commemorate the campaign and siege and defense of Petersburg, Virginia, in 1864 and 1865 and to preserve for historical purposes the breastworks, earthworks, walls, or other defenses or shelters used by the armies therein the battle fields at Petersburg, in the State of Virginia..." (NPS 2004). Administration of the cemetery, together with Petersburg NB, was transferred from the U.S. War Department to the NPS on August 10, 1933. In 1962, Congress changed the name of the park to Petersburg National Battlefield and authorized the acquisition of additional lands relevant to this particular aspect of the Civil War.

## **POPLAR GROVE NATIONAL CEMETERY**


The cemetery was established in 1866 as one of the more than 70 national cemeteries created by the U.S. War Department after the Civil War ended to bury the unprecedented number of soldiers killed in this war. The cemetery was designated to receive burials of Union soldiers who died in the battles associated with the 10-month Petersburg Campaign of 1864 and 1865. The cemetery's chosen site was the Flower Farm, owned at this time by a family from Pennsylvania. Between October 1864 and the end of the Civil War in April 1865, the specific site destined for the cemetery was employed as the camp of the 50th New York Volunteer Engineers. This engineers' battalion, employed to build the Federal Left Flank west of the Weldon Railroad nearby, also designed and built a series of loblolly pine camp structures that featured a rustic style Gothic chapel and meeting hall, known as Poplar Grove Church. The church structure became the pivotal focus of the new cemetery after burials commenced in 1866. By 1869, when the burial corps had finished their work, the church had been removed due to its poor condition. A new wood frame lodge and some log barracks from the camp replaced the church as the main structures at the cemetery.

The original design of the 8-acre cemetery included a burial plan that was arrayed in concentric circles around a flagstaff atop a raised mound flanked by four gun monuments, a design similar to many of the new national cemeteries. The graves, of which over two-thirds were of unknown soldiers, were originally marked with wooden grave markers. A long approach road from Vaughan Road led to the cemetery's entrance, with a narrow east-west road leading from the cemetery entrance's southwest area to the flagstaff in the center of the cemetery. A wood paling fence originally encircled the cemetery.

The cemetery received many improvements in the 1870s, as a result of evolving national cemetery standards. These improvements included the existing 1871 stone Second Empire lodge at the cemetery entrance, which served as the superintendent's residence; and the replacement of the wood fence with an Osage orange hedge and a boxwood hedge in the shape of a Maltese cross in front of the new lodge in 1871. The surface of the drives and walks was changed from gravel to turf between 1872 and 1874. In 1876, a brick inclosure wall and the granite and iron entrance gates were installed. A year later, the wood markers were replaced with Vermont marble headstones, which identified the known dead, and blocks reserved for the unknown soldiers' burials. Settees (benches) were first added around 1878, around the same time as the designed approach road, allée of trees, and the addition of a brick tool shed-stable and kitchen buildings. Four iron tablets/signs, common to all national cemeteries, were installed around 1881. Throughout the late 19th century, improvements to the landscape included the planting of ornamental shrubs, flowers, and specimen trees. An iron bandstand, known as a rostrum, was added in 1897 for commemorative ceremonies, especially Memorial Day, which was recognized by all of the northern states in the 1890s.



#### LEGEND

 Petersburg National Battlefield Sites



#### Petersburg National Battlefield

##### *Poplar Grove National Cemetery*

Rehabilitate Facilities, Resources, & Character Defining Elements to National Cemetery Standards



0  3 miles

Figure 1  
Site Location

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#### LEGEND

- Cemetery Wall
- Existing Private Driveway Access
- Open Drain Field (Septic)
- ~ Drainage Pipe in Wall



#### Petersburg National Battlefield

##### Poplar Grove National Cemetery

Rehabilitate Facilities, Resources, & Character Defining Elements to National Cemetery Standards

Figure 2  
Existing Conditions

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While its function as a final resting place and commemorative site for Civil War dead, including re-interment of more recently discovered Union burials in the Petersburg area, did not change in the early 20th century, the cemetery's physical appearance continued to evolve. Notable changes occurred while still under the administration of the U.S. War Department. These changes included the 1929 construction of a restroom and garage (maintenance facility), which replaced the 1870s kitchen and stable, and the replacement of the lodge's slate roof with a metal covering. A new concrete porch deck was constructed in 1931. Other improvements in 1931 involved the planting of 101 trees, paving of the approach road and main drive, and installation of a new iron flagstaff.

In August 1933, administration of the cemetery and Petersburg NB (then still known as the Petersburg National Military Park), was transferred from the U.S. War Department to the NPS. Arguably the most dramatic change to the cemetery occurred in 1934 when the NPS cut the upright headstones and laid their top portions flush with the ground to reduce maintenance during the Great Depression. The flush position of the headstones, now nearly invisible in the lawn, greatly diminished the striking radiating plan, which visually reminded visitors of the number of soldiers who sacrificed their lives in the Civil War. Later changes to the cemetery included new signs and burial register in the 1950s and removal of the benches, boxwood Maltese cross hedge, and three of the four gun monuments in the 1970s. Other changes to the cemetery's appearance included the construction of two suburban houses close to the north and east walls and a private driveway north of the cemetery approach road. Although the cemetery was officially closed for new burials in 1957, it remained open for burial of Civil War remains discovered in the Petersburg battlefields. In 2003, three Civil War remains were reinterred in the cemetery, the first in the cemetery since it was officially closed.

The cemetery was administratively listed in the National Register of Historic Places (National Register) in 1966 as part of Petersburg NB. The cemetery derives its primary significance under National Register Criterion A in the area of military history, for its association with the Civil War, 1861 to 1865, and as a component of the national cemetery system. The cemetery also meets National Register Criterion C in the area of landscape architecture, for illustrating the initial development of the national cemetery system through the early 1880s and its subsequent development through the early 1930s under U.S. War Department administration.

The current National Register listing for Petersburg NB was made without adequate documentation, which was common for administrative listings when the National Register was first established. The Virginia SHPO concurred with the park, based on the *Cultural Landscape Report for Poplar Grove National Cemetery* (CLR) (Olmsted Center 2009), that Poplar Grove National Cemetery is eligible for listing under National Register Criteria A and C, as described above. Out of the 56 features identified, 33 were evaluated as contributing, 22 were evaluated as non-contributing, and 1 feature was not evaluated (see Appendix B for a copy of the letter from the SHPO, listing these individual features).

The cemetery also meets the registration requirements of the National Register Multiple Property "Civil War Era National Cemeteries" submitted by the Department of Veterans Affairs and approved by the National Register in 1994. It is, however, not included in this listing because it is administered by the NPS.

## **PROJECT BACKGROUND**

Previous and related planning studies have been completed for Petersburg NB, as well as specific plans for the cemetery. These plans were reviewed to provide additional information and guidance for the proposed action. In addition, internal and public scoping was undertaken to allow agencies and interested parties to provide additional information regarding specific portions of the proposed action. The studies utilized and scoping efforts undertaken are summarized below.

### **LEGISLATIVE MANDATES**

There are a number of legislative mandates directing the appearance and maintenance of national cemeteries. While the cemetery is not legally part of the contemporary national cemetery system, it was historically developed as part of the system, and it is largely for this reason that NPS national cemetery regulations defer, in part, to those of the National Cemetery Administration (NCA). The overall regulations pertaining to the cemetery landscape are contained in 36 CFR Part 12: National Cemetery Regulations, which are modeled after the parallel regulations under the NCA (38 CFR Part 38: National Cemeteries of the Department of Veterans Affairs). NPS DO 61: National Cemetery Operations provide additional policy and procedures for the NPS to preserve and administer its 14 national cemeteries. One of the more recent and relevant laws related to the cemetery is the Veterans Millennium Health Care and Benefits Act of 1989 (Pub. L. No. 106-117, 113 Stat. 1545, 1581). As a result of this law, the NCA undertook a study to assess improvements needed to national cemeteries. In 2002, the Secretary of Veterans Affairs issued the *Cemetery Standards of Appearance* study, which contains the established standards by which all national cemeteries should be maintained (NCA 2002). The findings of this study, and other legislative actions, contributed to the development of this planning process.

### **PREVIOUS AND RELATED PLANNING STUDIES**

Several plans and studies have informed and contributed to the development of alternatives for rehabilitating the cemetery and improving facilities in and around it. These include the *Petersburg National Battlefield Final General Management Plan and Abbreviated Final Environmental Impact Statement* (NPS 2004), the *Cultural Landscape Report for Poplar Grove National Cemetery* (Olmsted Center 2009), and the *Phase I Archeological Survey: Rehabilitate Poplar Grove National Cemetery Project* (A.D. Marble 2008).

The *Petersburg National Battlefield Final General Management Plan and Abbreviated Final Environmental Impact Statement* (GMP/EIS) (NPS 2004) establishes management objectives and policies to guide the park for the next 15-20 years. The GMP/EIS notes the significance of the cemetery and its contribution to the importance of the park. The document calls for the rehabilitation and improvement of facilities within the cemetery. The recommendations made in the GMP/EIS initiated the planning process that has led to the alternatives presented in this document.

The *Cultural Landscape Report for Poplar Grove National Cemetery* (Olmsted Center 2009) built upon the recommendations made in the GMP/EIS. The CLR documents the history and the existing conditions at the cemetery, analyzes the characteristics and features of the cemetery

landscape, evaluates the historical significance of the cemetery, and provides treatment recommendations to guide the preservation and enhancement of the historic character of the cemetery. The recommendations made in the treatment plan are contained within Alternative B (NPS Preferred Alternative) in this document.

The CLR was supported by the ***Phase I Archeological Survey: Rehabilitate Poplar Grove National Cemetery Project*** (A.D. Marble 2008). The report summarizes the results of the ground penetrating radar (GPR) and conductivity surveys of preselected 100- by 100-foot blocks in the north, south, east, and west quadrants of the cemetery. Following the GPR survey, standard archeological excavations were completed in the south and east quadrant survey areas. The purpose of the excavations was to ground-truth the GPR and conductivity results. The investigation results confirmed that the GPR and conductivity studies provided an accurate view of both the number of grave shafts and their orientation. The excavations were confined to the removal of the upper layers of soil; no graves were excavated. The archeological excavations confirmed grave shaft depths and identified two features (a rodent run or root cast and a postmold) not related to the interments. Both pre-contact Native American and post-contact historic period artifacts were recovered. While much of the material appears to be related to the pre-cemetery Civil War encampment, there were artifacts suggesting that the cemetery landform was the scene of human activity prior to the Civil War as well. The development and analysis of alternatives presented in this EA incorporates this information.

## SCOPING

The scoping process is initiated at the beginning of a NEPA project to identify the range of issues, resources, and alternatives to address in the EA. Typically, both internal and public scoping is conducted to address these elements. Public scoping includes any interested agency or agency with jurisdiction by law or expertise; including, as appropriate, the SHPO, as well as local communities and interested members of the general public to obtain early input. The planning process for the proposed action was initiated during the internal, agency, and public scoping for the Petersburg NB GMP/EIS in 2002. This process introduced plans to address the cemetery and initiated discussions with the SHPO and other interested agencies and individuals. This coordination continued during the internal and public scoping conducted during the development of the CLR in 2007.

The scoping process for the proposed action continued in March 2005, when staff from Petersburg NB and resource professionals from the NPS conducted internal scoping. The NPS followed this meeting with a public meeting on September 28, 2007. At this meeting, the NPS introduced the proposed cemetery rehabilitation to the public and solicited initial input on the proposed plan. The NPS then conducted another internal scoping meeting in October 2008 to define the purpose and need, identify potential actions to address the need, determine the likely issues and impact topics, and identify the relationship of the proposed action to other planning efforts at Petersburg NB. Following this internal scoping effort, several agencies were contacted, including the Virginia SHPO, the Virginia Council on Indians, the Virginia Department of Game and Inland Fisheries, and the U.S. Fish and Wildlife Service. In addition, all of the towns, groups, and interested parties included in the park's mailing list were notified of the planning process via letter. The NPS also hosted two public meetings in October 2008 to present options

for the cemetery to the public. Following the public meetings, the NPS held a 30-day public comment period to solicit input on the proposed action. For further scoping and public participation information, see “Chapter 5: Consultation and Coordination” and “Appendix B: Relevant Agency Correspondence.”

## **PLANNING ISSUES AND CONCERNS**

During the scoping process, specific considerations and concerns were identified as critical to enhancing the cultural landscape of the cemetery through rehabilitation of its character-defining features. The following were identified as most important to the planning process: protecting the historic resources in the cemetery, rehabilitating the cultural landscape of the cemetery, restoring the approach to the cemetery, enhancing the visitor experience in the cemetery, and improving drainage out of the cemetery. Along with the purpose and need for the proposed action, these topics guided the development of alternatives and contributed to the selection of impact topics, as identified in the next section.

***Protecting the historic resources in the cemetery.*** The primary National Register significance of the cemetery is based on its intimate association with the Civil War, the burials of Union dead, and the establishment of the National Cemetery system. Its significance is also derived from the cemetery’s physical resources, which include the allée of trees along the cemetery approach road (currently in poor condition), cemetery wall and entry gates, late 19th and early 20th century historic buildings, the approximately 5,615 grave markers that are located within the walls, and the other landscape elements that compose this resource. The proposed action seeks to properly display and protect these resources. Therefore, any proposals made in this plan should seek to protect the historic resources in and adjacent to the cemetery.

***Rehabilitating the cultural landscape of the cemetery.*** Over time, and as a result of different management programs, the appearance of the cemetery has been greatly altered from its intended condition and appearance. These changes affect the historic setting and appearance of the cemetery landscape. The disturbance of this setting interferes with a full and respectful understanding or appreciation of the history and importance of the cemetery. Therefore, any proposals made in this plan should seek to rehabilitate the cultural landscape of the cemetery.

***Restoring the approach to the cemetery.*** Upon reaching the cemetery entrance, visitors enter a narrow approach road that is lined by a mixed-growth forest. The approach road ends in a small parking lot that is not lined or marked like other parking lots in the park and which disrupts the view of the adjacent cemetery entrance. The cemetery approach road also is in poor condition and is not paved with historically accurate material. This point of access does not present the cemetery in the manner that the NPS desires nor with the respect that a national cemetery deserves. Therefore, any proposals made in this plan should seek to restore the approach to the cemetery to its condition at the end of the War Department era.

***Enhancing the visitor experience in the cemetery.*** Signs and opportunities for visitor contact are limited. During peak seasons, the NPS is able to provide staff in the lodge to answer questions and direct visitors throughout the cemetery. When staff is not available, visitors must walk through the cemetery uncertain of the location of specific graves, the relevance of historic

structures, or the best means to move through the cemetery. The proposed action should consider improving wayfinding and interpretive signs, as well as providing a facility that supports year-round visitor information.

***Improving drainage out of the cemetery.*** The cemetery wall was constructed with drain pipes to allow for water to flow out of the cemetery after storm events (see Figure 2 for approximate locations). Over time, these pipes have aged and become less efficient. This has resulted in areas that do not drain properly, leaving grave markers partially or totally submerged for extended periods of time and sediment backing up. It also has resulted in grave markers being buried, in some instances. These conditions are not acceptable by NPS or national cemetery standards. Therefore, any proposals made in this plan should seek to improve drainage out of the cemetery.

## **REGULATORY ISSUES AND MANAGEMENT CONCERNS**

Based on discussions with NPS staff and planning team members, implementation of the Rehabilitate Facilities, Resources & Character Defining Elements to National Cemetery Standards EA should not require any changes to existing legislation or management policies. Several approvals would be required prior to construction. These include coordination with and approval by the Virginia SHPO, land disturbance permits, coordination with adjacent landowners, and approvals from the Virginia Department of Health. These requirements are described further in “Chapter 5: Consultation and Coordination.”

## **IMPACT TOPICS RETAINED FOR ANALYSIS**

Impact topics are resources of concern within the project area that could be affected, either beneficially or adversely, by the range of alternatives presented in this EA. They were identified based on the issues raised during scoping; site conditions; federal laws, regulations, Executive Orders, NPS *Management Policies 2006* (NPS 2006), and Director’s Orders; and staff knowledge of the park’s resources.

Impact topics identified and analyzed in this EA are listed below along with a brief rationale for the selection of each impact topic. They include cultural landscapes, historic structures, archeological resources, visitor use and experience, and operations and infrastructure. Each impact topic is further discussed in detail in “Chapter 3: Affected Environment” of this document.

### **Cultural Landscapes**

A cultural landscape is a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person exhibiting other cultural or aesthetic values. There are four kinds of cultural landscapes, which are not mutually exclusive: historic site, historic designed landscape, historic vernacular landscape, and ethnographic landscape (NPS DO 28: Cultural Resources Management Guidelines). The park’s cultural landscape has been assessed in several NPS documents including the 2009 CLR and the 2008 Phase I Archaeological Survey. The proposed action would rehabilitate the cultural landscape of the cemetery. Therefore, the impact topic of cultural landscapes is addressed.

## **Historic Structures**

A historic structure is defined by the NPS as “a constructed work, usually immovable by nature or design, consciously created to serve some human act” (DO 28). In order for a structure or building to be listed on or eligible for listing on the National Register, it must possess historic integrity of those features necessary to convey its significance, particularly with respect to location, setting, design, feeling, association, workmanship, and materials. The National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (NPS 1990) provides a comprehensive discussion of these characteristics. The park’s historic structures, buildings, and objects have been assessed in several NPS documents including the 2009 CLR. The proposed action would modify the historic structures of the park. A Historic Structures Report would be completed before any changes were made to the historic structures in the cemetery. Therefore, the impact topic of historic structures is addressed.

## **Archeological Resources**

Archeological resources are the material remains of past human activity (National Register Bulletin 36, Guidelines for Evaluating and Registering Archaeological Properties). These material remains are analyzed using several methods including, but not limited to, scientific tests, oral interviews, and ethnographic data. Archeological resources both within and outside of the inclosure wall at the cemetery include the grave shafts and the associated interments. Other features such as postmolds, culverts, and French drains; remnants of the Civil War engineer’s camp; various episodes of modification within the cemetery in the post-Civil War period; and pre-Civil War historic and Native American uses also may be present. Therefore, the impact topic of archeological resources is addressed.

## **Visitor Use and Experience**

Enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks (NPS 2006). The NPS strives to provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the natural and cultural resources found in parks. As a National Cemetery, Poplar Grove has special meaning to the citizens of this nation. The proposed action is meant to enhance the visitor experience, which encompasses interpretation, appreciation, understanding, enjoyment, safety, circulation, and accessibility of the cemetery. Because the proposed action would result in changes to the visitor experience, the impact topic of visitor use and experience is addressed.

## **Operations and Infrastructure**

The proposed action could result in changes to park operations and infrastructure in and around the cemetery. These changes would be related to the condition of existing resources and the introduction of new resources to the cemetery. Therefore, the impact topic of operations and infrastructure is addressed.

## **IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS**

The following impact topics were initially considered but dismissed from further analysis because the resource is not present in the project area or because any potential impacts would be no more

than negligible to minor. They include ethnographic resources, soils and topography, prime farmland, geologic resources, vegetation, wildlife and wildlife habitat, special status species, water quality, wetlands, floodplains, air quality, soundscapes, lightscapes, socioeconomic resources and adjacent lands, public safety, climate change, energy requirements and conservation potential, museum objects, Indian trust resources and sacred sites, and environmental justice. A brief rationale for the dismissal of these impact topics is provided below.

### **Ethnographic Resources**

An ethnographic resource is defined as any “site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it” (DO 28). Poplar Grove National Cemetery has not been identified as an ethnographic resource, and no individual or group has claimed the resource to hold traditional legendary, religious, subsistence, or other significance. Therefore, the impact topic of ethnographic resources is dismissed from further analysis.

### **Soils and Topography**

NPS policy is to protect the natural abundance and diversity of all naturally occurring communities. NPS *Management Policies 2006* (NPS 2006) and other NPS and park policies provide general direction for the protection of soils and topography. The proposed action may involve temporary disturbance, compaction, and exposure of natural soils within the cemetery. Additional soils also may be introduced along the cemetery wall to correct drainage problems. Temporary impacts also would occur during the installation of the new septic field. These actions would result in negligible to minor impacts on soils that would not persist beyond the construction process. The construction of a new parking lot would be mitigated by returning the area of the existing parking lot to natural, vegetated conditions. In addition, any changes in topography would be related to limited grading in select areas. Therefore, the impact topic of soils and topography is dismissed from further analysis.

### **Prime Farmland**

Prime farmland is one of several designations made by the U.S. Department of Agriculture to identify important farmlands in the United States. It is important because it contributes to the nation’s short- and long-range needs for food and fiber. In general, prime farmland has an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, an acceptable level of acidity or alkalinity, an acceptable content of salt or sodium, few to no rocks, and permeable soils (designated as prime farmland soils). According to the Natural Resource Conservation Service (NRCS), there are no prime farmland soils within the project area (NRCS 2008). Therefore, the impact topic of prime farmland is dismissed from further analysis.

### **Geologic Resources**

There are no unique geologic features in the project area. The geology beneath the cemetery is consistent with the surrounding region. The proposed action would only affect the upper layer of soil and not penetrate to geologic resources. Therefore, the impact topic of geologic resources is dismissed from further analysis.

## **Vegetation**

NPS policy is to protect the natural abundance and diversity of all naturally occurring communities. *NPS Management Policies 2006* (NPS 2006) and other NPS and park policies provide general direction for the protection of vegetation. The proposed action would include planting new vegetation and clearing and/or thinning existing vegetation to rehabilitate the historic appearance of the cemetery. These actions would be limited to select species and would only introduce species that would be managed as part of the cultural landscape of the cemetery. In areas where vegetative screening or spatial organization is dictated, native species would be used. Other areas would replant with historically accurate species, where possible. The loss of grass species through the construction of the proposed parking lot would be mitigated by replanting the area of the existing parking lot with similar, native grasses. Because these changes relate to the cultural landscape, the impact topic of vegetation is discussed under cultural landscapes, so it is therefore dismissed as a separate impact topic.

## **Wildlife and Wildlife Habitat**

NPS policy is to protect the natural abundance and diversity of all naturally occurring communities. *NPS Management Policies 2006* (NPS 2006), NPS DO 77: Natural Resources Management, and other NPS and park policies provide general direction for the protection of wildlife and wildlife habitat. The wildlife species found in and around the cemetery, including raccoons, squirrels, and many bird species, are common to this region. The proposed action may introduce a temporary impact into this environment, lasting only as long as the construction process. These impacts, however, are common throughout the developing region, and these species have adapted to these interruptions. Because there would be no new impacts to wildlife from the proposed actions, the impact topic of wildlife and wildlife habitat is dismissed from further analysis.

## **Special Status Species**

In addition to NPS policies and management guidelines, the Endangered Species Act of 1973, as amended provides for the protection of rare, threatened, and endangered species (floral and faunal). In a letter dated October 28, 2008, the Virginia Department of Conservation and Recreation acknowledged that no federally listed or proposed threatened or endangered species under their jurisdiction are known to occur within the project area. (A copy of this letter is provided in Appendix B.) As a result, the impact topic of special status species is dismissed from further analysis.

## **Water Quality**

*NPS Management Policies 2006* (NPS 2006), NPS DO 77: Natural Resources Management, along with the Clean Water Act and other federal, state, and local regulations provide general direction for the protection of surface and groundwater. The proposed action may alter the current drainage patterns at the cemetery. However, these changes would be negligible to minor, confined to the area immediately surrounding the cemetery wall. There would be no impact to water resources inside or beyond the cemetery wall. Therefore, the impact topic of water resources is dismissed from further analysis.



## **Wetlands**

Executive Order 11990, “Protection of Wetlands,” and NPS DO 77-1: Wetland Protection define the NPS goal to maintain and preserve wetland areas. Per National Wetland Inventory mapping and field observation, there are no wetlands located within the cemetery or immediately adjacent to the approach road and parking lot. Therefore, the impact topic of wetlands is dismissed from further analysis.

## **Floodplains**

Executive Order 11988, “Floodplain Management,” and NPS DO 77-2: Floodplain Management require an examination of impacts on floodplains and potential risk involved in placing facilities within floodplains. Despite some periodic flooding from stormwater runoff, the cemetery is outside the 100- and 500-year floodplains. Therefore, the impact topic of floodplains is dismissed from further analysis.

## **Air Quality**

The Clean Air Act and NPS *Management Policies 2006* (NPS 2006) require consideration of air quality impacts from NPS projects. Dinwiddie County is not listed by the U.S. Environmental Protection Agency (EPA) as being in nonattainment of National Ambient Air Quality Standards areas as defined in the Clean Air Act (EPA 2008). The proposed action would have minimal short-term impacts on air quality. Hauling of material, operating of equipment, and other construction activities could result in temporary increases in vehicle exhaust and emissions. However, these activities would be consistent with other activities that have and will continue to occur in the immediate area. The increases in emissions that occur during these activities quickly dissipate. Overall, there could be negligible impacts on local air quality; however, such impacts would be short-term, lasting only as long as construction. Therefore, the impact topic of air quality is dismissed from further analysis.

## **Soundscapes**

As described in NPS *Management Policies 2006* (NPS 2006) and NPS DO 47: Sound Preservation and Noise Management, preservation of natural soundscapes associated with national park units is an important part of the NPS mission. Natural soundscapes exist in the absence of human-caused sound. The natural, ambient soundscape is the aggregate of all natural sounds that occur in the park beyond the range of sounds that humans can perceive. This sound can be transmitted through air, water, or solid materials. The frequencies, magnitudes, and durations of human-caused sounds considered acceptable varies among NPS units, as well as potentially throughout each park unit, being generally greater in developed areas and less in undeveloped areas. At the cemetery, natural soundscapes do not exist because of the developed nature of the region. Any construction associated with implementation of the proposed action, e.g., the hauling of material or the operation of construction equipment, could result in additional, dissonant sounds, but such sounds would be temporary. Because the area is already developed and supports a variety of activities and traffic, the impact topic of soundscapes is dismissed from further analysis.

## **Lightscares**

In accordance with *NPS Management Policies 2006* (NPS 2006), the NPS strives to preserve natural, ambient lightscares, which are natural resources and values that exist in the absence of human-caused light. The current lightscape is already impacted by surrounding developments in Dinwiddie County and the city of Petersburg. Additionally, any lighting that may be added around the cemetery flagstaff would be focused on the flag and adjacent signs and would not affect adjacent landowners. Proposed actions would not elevate the existing lightscape impacts in the area. Therefore, the impact topic of lightscares is dismissed from further analysis.

## **Visual Resources**

The Organic Act states that NPS units are charged with conserving park scenery, along with all the natural and cultural resources that contribute to important views. In the evaluation of visual resources, both the visual character of the project area and the quality of the viewshed within the project area are considered. A viewshed comprises the limits of the visual environment associated with the proposed action including the viewsheds within, into, and out of the project area. The cemetery includes a wide variety of historic viewsheds that are important to the NPS interpretation of the cultural resources, along with intended viewsheds that reflect the commemorative state of a national cemetery. The proposed action could result in changes to these viewsheds. Potential changes to visual resources would be directly related to the cultural landscape and the visitor experience. Therefore, the impact topic of visual resources is addressed under cultural landscapes and visitor use and experience and is dismissed as a separate impact topic.

## **Site Access and Circulation**

Safe and efficient access and circulation of all visitors at Petersburg NB is important to an enjoyable visitor experience. The proposed action may introduce new access and circulation patterns in and around the cemetery. The changes in site access and circulation would be directly related to the visitor use and experience and operations and infrastructure at the cemetery. In addition, the relocation of the private driveway access would shift the access road approximately 400 feet from its existing location, separating visitor traffic from residential traffic. This would result in a negligible change in access for adjacent landowners. Therefore, the impact topic of site access and circulation is addressed under visitor use and experience and operations and infrastructure and is dismissed as a separate impact topic.

## **Socioeconomic Resources and Adjacent Lands**

*NPS Management Policies 2006* (NPS 2006) requires the NPS to identify any impact to socioeconomic resources and adjacent lands when determining the feasibility of a proposed action. The cemetery draws visitors interested in Petersburg NB to Dinwiddie County. The proposed action may result in an enhanced visitor experience to the cemetery and thus may also impact the surrounding community. While the private driveway access could be relocated approximately 400 feet from its current location, the proposed action would not impact adjacent landowners. The park would continue to work closely with the adjacent landowners in the relocation of the private driveway access. In addition, development of the parking alternatives proposed in this document would require the acquisition of adjacent lands by the NPS. The

impacts related to visitation and land acquisition are addressed in the park's GMP/EIS (NPS 2004) and are beyond the scope of analysis for this document. Therefore, the impact topic of socioeconomic resources and adjacent lands is dismissed from further analysis.

### **Public Safety**

*NPS Management Policies 2006* (NPS 2006) instructs NPS staff to consider public safety in all proposed actions. In order to protect public safety, the cemetery would be closed during the construction process. NPS staff and contractors would comply with appropriate safety measures to avoid any potential injuries. Following construction, there would be no changes to the condition of any hazardous material that may exist in the maintenance facility nor would any threats to public safety exist. Therefore, the impact topic of public safety is dismissed from further analysis.

### **Climate Change**

Climate change refers to any significant changes in average climatic conditions (such as mean temperature, precipitation, or wind) or variability (such as seasonality, storm frequency, etc.) lasting for an extended period (decades or longer). Recent reports by the U.S. Climate Change Science Program, the National Academy of Sciences, and the United Nations Intergovernmental Panel on Climate Change provide clear evidence that climate change is occurring and will accelerate in the coming decades. There is strong evidence that global climate change is being driven by human activities worldwide, primarily through the burning of fossil fuels and tropical deforestation. These activities release carbon dioxide and other heat-trapping gases, commonly called "greenhouse gases," into the atmosphere (IPCC 2007a, 2007b, 2007c, 2007d).

There are two aspects of climate change that must be considered in an environmental impact analysis:

- our impact on climate change: i.e., through our actions, the potential to increase or decrease emissions of greenhouse gases that contribute to climate change
- the impact of climate change on us: i.e., how are the resources that we manage likely to change in response to changing climate conditions, and how does that change or otherwise affect our management actions and the impacts of those actions on the resource

During the construction process, the proposed action could result in increased emissions of greenhouse gases from the operation of construction vehicles. Once construction was complete, however, these emissions would stop. As climate change conditions develop, there could be some change in the composition and structure of the vegetation in and around the cemetery. The vegetation in the cemetery is not unique and would not be at greater risk than vegetation throughout the region. The grave markers and other structures would not be noticeably impacted by climate change. Therefore, the impact topic of climate change is dismissed.

### **Energy Requirements and Conservation Potential**

The CEQ guidelines for implementing NEPA require an examination of energy requirements and conservation potential as a possible impact topic in environmental documents. The park strives to

incorporate the principles of sustainable design and development into all facilities and operations. The objectives of sustainability are to design structures to minimize adverse impacts on natural and cultural values; to reflect their environmental setting; to maintain and encourage biodiversity; to construct and retrofit facilities using energy efficient materials and building techniques; to operate and maintain facilities to promote their sustainability; and to illustrate and promote conservation principles and practices through sustainable design and ecologically sensitive use. Essentially, sustainability is living within the environment with the least impact on the environment. Alternatives that did not provide sustainable and energy efficient means to rehabilitate the cemetery were considered but dismissed from this project and are described in greater detail in “Chapter 2; Alternatives.” The park would encourage suppliers and contractors to follow sustainable practices and address sustainable park and non-park practices. Consequently, any adverse impacts relating to energy use, availability, or conservation would be negligible. Therefore, the impact topic of energy requirements and conservation potential is dismissed.

### **Museum Objects**

The NPS defines a museum object as “a material thing possessing functional, aesthetic, cultural, symbolic, and/or scientific value, usually movable by nature or design. Museum objects include pre-contact Native American and historic objects, artifacts, works of art, archival material, and natural history specimens that are part of a museum collection” (DO 28). The grave markers at the cemetery will be addressed as historic objects under the cultural landscapes section of this document. The proposed action would not address or impact any of the park’s other collections. Therefore, the impact topic of museum objects is dismissed.

### **Indian Trust Resources and Sacred Sites**

Secretarial Order 3175 requires that any anticipated impacts on Indian trust resources from a proposed project or action by U.S. Department of the Interior agencies be explicitly addressed in environmental documents. The federal Indian Trust responsibility is a legally enforceable obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal laws with respect to Native American tribes. There are no known Indian Trust resources in the project area, and the lands comprising the park are not held in trust by the secretary of the interior for the benefit of Indians due to their status as Indians. Therefore, the impact topic of Indian Trust resources is dismissed.

In September 2007 and September 2008, the NPS contacted the Virginia Council on Indians to inform them of the project and subsequent public meetings regarding the rehabilitation and management of Poplar Grove National Cemetery (see Appendix B). Representatives did not attend the meeting and no formal response was received. Based on this, the park is not aware of any known sacred sites within the project area. Therefore, the impact topic of sacred sites is dismissed from further analysis.

The Virginia Council on Indians, the Catawba Indian Nation, and the Chippewa Indians will receive a copy of the Environmental Assessment for review and comment.

In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001) would be followed.

### **Environmental Justice**

Executive Order 12898, “General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. According to the EPA, environmental justice is the “...fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.”

The goal of “fair treatment” is not to shift risks among populations, but to identify potentially disproportionately high and adverse effects and identify alternatives that may mitigate these impacts. Environmental justice is dismissed as an impact topic for the following reasons:

- The park staff and planning team solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.
- Implementation of the proposed action would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse impacts on any minority or low-income population.
- The impacts associated with implementation of the proposed action would not disproportionately affect any minority or low-income population or community.
- Implementation of the proposed action would not result in any identified effects that would be specific to any minority or low-income community.

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# 2

## ALTERNATIVES

This chapter describes alternatives for removing the conditions which hinder the ability to access, understand, and reverently commemorate the cemetery as the final resting place for those soldiers that died in and around Petersburg and the nine surrounding counties throughout Central Virginia during the Civil War. The proposed action was designed to improve the commemorative landscape and rehabilitate the cemetery to its appearance at the end of the War Department era. This EA examines two alternatives: a no-action alternative (Alternative A) and an action alternative (Alternative B: the NPS Preferred Alternative).

### DEVELOPMENT OF ALTERNATIVES

Development of the alternatives to rehabilitate the cemetery to its appearance at the end of the War Department era began during the development of the GMP/EIS (NPS 2004). The alternatives in the plan include addressing the cemetery's physical appearance. Plans for the cemetery were further developed in the CLR (Olmsted Center 2009). The document analyzed the existing conditions, proposed several treatment recommendations for the cemetery, and identified a preferred treatment method. Each of these documents was presented to the public. Public comments, along with the findings of the planning documents and NPS resource experts, revealed that there was only one complete alternative that would meet the purpose, need, and objectives of the proposed action. This alternative is the NPS Preferred Alternative and is discussed in detail under Alternative B: Rehabilitation.

### ALTERNATIVE A: NO-ACTION

Under Alternative A, the NPS would continue to maintain current conditions at the cemetery (Figure 3). All of the formerly upright headstones would remain flush against the ground. New private grave markers could be installed at the cemetery, but the remaining graves would remain flush. The NPS would clean and re-incise these stones as funding and staff became available.

No changes would be made to the cemetery entrance, approach road, or parking lot. Visitors would continue to access the cemetery via the 11-foot wide, 1,025-foot long asphalt approach road off Vaughan Road. The gravel that was used to cover the approach road has worn thin in many places, creating small ruts and ridges. NPS would continue to maintain the existing road conditions as staff and funding became available. The entrance to the approach road would continue to be flanked by private mailboxes. Views from the approach road would be dominated

by a mix of forest types, with a private driveway branching off towards the private residences north of the cemetery.

The 1,025-foot approach road would continue to lead visitors directly to the cemetery parking lot. The 7,000-square-foot paved parking lot provides space for 6-8 private vehicles, with additional room for a bus or trailer along its wooded edge. When funding and staff became available, the NPS would attempt to repave the parking lot with additional gravel or another material that was historically accurate.

The cemetery wall and eight associated drain pipes would be maintained in their current condition. Similarly, no changes would be made to the lawn or main drive. Any additional maintenance or repair of these structures would occur when funding and staff became available.

The lodge, restrooms, and the maintenance facility would continue to be operated in their current state. The lodge would be staffed seasonally, providing minimal information for visitors. The modern additions and paint colors would be left in place. Any improvements to these structures or the visitor services offered would occur when funding and staff became available.

The existing septic system would remain, consisting of a small septic tank located northeast of the restrooms and an open drain field extending west through the cemetery. This system was originally installed in 1974 and was sized to support a single-family residence.

Signs within the cemetery would be limited to a plaque outside the lodge and the grave register at the base of the flagstaff. The register would remain as the only wayfinding sign at the cemetery. No changes would be made to the flagstaff or the remaining historic cannon memorial. No additional memorials, benches, or other structures would be installed at the cemetery.

## **ALTERNATIVE B: REHABILITATION (NPS PREFERRED ALTERNATIVE)**

Under Alternative B, the NPS would rehabilitate the cemetery to its 1933 appearance, which is the end of the U.S. War Department era (1869-1933). Following the end of the U.S. War Department administration of the cemetery in 1933, positioning of the grave markers to lie flush with the ground altered the original solemn and dignified effect of the burial grounds. Alternative B would reestablish missing or altered historic features of the cemetery (Figure 4).

The NPS would install new upright headstones or blocks of Vermont marble or similar white marble in the style appropriate to the original burial era at all graves, with the exception of the private and possibly some of the nonstandard markers. Grave markers and blocks would be plumb and in radial alignment with adjoining headstones and blocks. Blocks marking unknown soldiers would be cleaned, and reused if in good condition and replaced if not in good condition. The inscriptions on the new grave markers would replicate the historic inscriptions. The NPS is aware that there are some markers where inscriptions differ from burial records or reflect inaccurate information.





- LEGEND**
- Cemetery Wall
  - Existing Private Driveway Access
  - Open Drain Field (Septic)
  - ~ Drainage Pipe in Wall



## Petersburg National Battlefield

*Poplar Grove National Cemetery*  
Rehabilitate Facilities, Resources, & Character Defining  
Elements to National Cemetery Standards

Figure 3  
**Alternative A: No-action**

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- LEGEND**
- Cemetery Wall
  - Relocated Private Driveway Access
  - Open Drain Field (Septic)
  - ~ Drainage Pipe in Wall



## Petersburg National Battlefield

*Poplar Grove National Cemetery*  
Rehabilitate Facilities, Resources, & Character Defining  
Elements to National Cemetery Standards

Figure 4  
**Alternative B: Rehabilitation**  
**(NPS Preferred)**

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Correct information regarding interred remains would be maintained at the cemetery in a database of grave records. Returning the headstones to their original uniform upright position and providing new, legible markers would rehabilitate the character-defining radial burial plan of the cemetery, show respect for the buried soldiers, provide for uniformity throughout the cemetery, and simplify the grave marker replacement process. New maintenance efforts would protect the new markers from damage or being covered by overgrown grass.

Disposition of existing historic grave markers would be determined in consultation with the SHPO, NCA, and other interested parties. The NPS preferred treatment would be to retain a representative sample of the grave markers for interpretive purposes and dispose of the rest of the replaced markers in a manner consistent with cemetery protocol. This could include burying the existing grave markers at the individual graves or saving a representative sample of existing grave markers for interpretation if they are destroyed.

When land becomes available through willing sellers, the parking lot would be moved from its 1995 location to an area accessible from the cemetery approach road, but outside the direct view of the cemetery gates and away from the character-defining approach road (Figure 4). The parking lot would be slightly larger in size than the existing parking lot (approximately 10,000 square feet versus 7,000 square feet), providing 20 parking spaces with additional space for a bus. The 1,025-foot cemetery approach road would be rehabilitated by restoring the historically accurate asphalt surface, minimal widening of the road prism, selective thinning of vegetation, and restoring the allée of trees that once lined the cemetery approach road. The private drive to the residences would be relocated approximately 400 feet to the west, away from the cemetery wall, to keep the drive separate from the cemetery approach road. This would require continued coordination with and action by the adjacent landowners. The mailboxes would be relocated away from the head of the cemetery approach road. Vegetative screening and/or thinning would rehabilitate cemetery viewsheds to provide a dignified and solemn approach to the cemetery and to shield cemetery views from modern development. This could include, at most, the clearing of the wood lot directly in front of the cemetery wall (and located on property owned by the National Park Foundation), converting approximately 2 acres of mixed pine forest to cultivated field/open meadow (Figure 4).

Under Alternative B, the NPS would rehabilitate and repair the cemetery wall. Work on the cemetery wall would include brick repair and/or replacement, re-pointing, surface cleaning, joint repair, waterproofing, and correction of previous treatments that do not meet Secretary of the Interior's Standards for the Treatment of Historic Properties. Drainage would be improved by repairing and/or correcting outfalls in the cemetery wall and the selective placement of fill material to restore positive drainage and eliminate standing water (Figure 4). During this process, the condition of the wall would be assessed to identify sections that may need to be rebuilt. If small sections of cemetery wall need to be rebuilt, the historic fabric of the brick wall would be retained and reused to the extent possible. The appearance of these newly rebuilt sections would match the appearance of the existing sections in brick size, color, and exterior texture; and the mortar color and joints would match the existing sections.

Within the cemetery, Alternative B would reestablish the circular alignment of the loop drive around the flagpole. A new flagpole would be installed that would be closer in height to the 80-

foot historic 1930s flagpole. Lighting compatible with the historic character of the cemetery in 1933 would be installed. The service drive would be realigned to reestablish a narrower entrance and shifted slightly east to protect the existing magnolia tree and configured to align with the inside edge of the proposed service yard hedge. A new service yard hedge would screen the maintenance facility from the cemetery. The garage would be returned to its historic appearance through the removal of nonhistoric features. The exterior of the lodge would be returned to its historic appearance, and the interior would be configured as the visitor contact station for the Western Front and would provide interpretive information for graves marker research and ranger-led programs. A new universally accessible walkway (concrete, stabilized earth, or gravel) would be constructed along the west side of the lodge to provide a new route of access to the public restroom, replacing the existing nonhistoric dirt path along the east side of the lodge. The proposed new walk would follow the general alignment of a walk shown on the 1892 Quartermaster General plan of the cemetery and which probably survived until the construction of the public restroom building in 1929. The historic appearance and color scheme of the public restroom building lodge and rostrum would be restored. The historic character of landscape trees and shrubs in the burial grounds and the Maltese Cross Hedge could be reestablished by planting new trees and shrubs.

These improvements would be accompanied by the installation of a new septic field. The septic field would be located between the cemetery wall and the proposed location for the new parking lot (Figure 4). The septic field would cover approximately 11,500 square feet and would service the lodge, restrooms, and maintenance garage. The existing septic system would be abandoned in place to minimize impacts.

Under Alternative B, the grave locator system and cemetery identification signs would be restored by either installing low granite posts with angled tops inscribed with the Division and Section classification at the front of each section in the middle along the circular drive (total of 31 sections) or by inscribing the Division and Section number on the side of the grave markers at the corners of each section. The historic iron welcome tablet would be re-installed on the east side of the lodge, and new cemetery information and interpretation would be installed near the cemetery entrance to replace existing nonhistoric aluminum frame signs that currently flank the central flagstaff. The NPS also would restore small-scale features in the cemetery. These features would include three missing gun monuments that together with the existing gun monument formerly encircled the central flagstaff and approximately 14 benches along the main drive, central loop, and around the third circular drive.

Because the NPS has determined that the rehabilitation of the cemetery is a complex undertaking that may be completed in stages and has the potential to adversely affect historic properties, compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f) is addressed through a programmatic agreement among the NPS and the Virginia SHPO. The draft agreement identifies the undertakings included and the stipulations and mitigation factors that must be adhered to prior to implementing the preferred alternative. A copy of this draft agreement is included in Appendix A.

## **ELEMENTS CONSIDERED BUT DISMISSED FROM FURTHER ANALYSIS**

During the development of alternatives for the proposed action, several different options were considered for the overall treatment of the cemetery.

### **TREATMENT OF THE CEMETERY**

The preferred alternative focuses on rehabilitation of the cemetery, with specific cemetery elements proposed for preservation, restoration, and reconstruction as defined in the Secretary of the Interior's Standards for the Treatment of Historic Properties. Rehabilitation would improve the utility or function of this cultural landscape, through repair or alteration, to make possible an efficient compatible use while preserving those portions and features that are important in defining the cemetery's significance. Preservation was not recommended as the primary treatment because it would retain the existing appearance that is inconsistent with its landscape's historic character and maintains a perceived dishonor to the veterans buried in the cemetery. Restoration also was not recommended as the primary treatment due to the lack of adequate visual and written documentation, the need to address contemporary park uses and visitor needs, and the existence of post-1933 graves that extend the recommended period of significance for the cemetery under Criterion A to 2003 (the date of the last burial). Reconstruction was not recommended because the cemetery does not retain much of its historic fabric, and thus would result in rebuilding a vanished landscape.

## **SUMMARY OF THE ALTERNATIVES**

Table 1 provides a summary of the alternatives presented above.

<b>Table 1: Summary of Alternatives</b>		
<b>Alternative Element</b>	<b>Alternative A: No-Action</b>	<b>Alternative B: Rehabilitation (NPS Preferred Alternative)</b>
Grave Markers	No changes would be made to the grave markers.	New headstones would be installed to stand upright. The existing grave markers would be removed. Block markers for unknown graves also would be replaced with new blocks. A representative sample of the existing headstones and blocks would be retained for interpretive purposes.
Entrance	No changes would be made. The entrance would continue to be shared with neighboring properties and not reflect the historic design of the cemetery.	Access to adjacent driveways would be relocated approximately 400 feet west. The cemetery approach road would be paved with gravel or other surfacing material sympathetic to the historic character of the cemetery entrance. An allée of trees would line the approach road. Approximately 2 acres of mixed pine forest would be converted to field to enhance views.



<b>Table 1: Summary of Alternatives</b>		
<b>Alternative Element</b>	<b>Alternative A: No-Action</b>	<b>Alternative B: Rehabilitation (NPS Preferred Alternative)</b>
Parking Lot	No changes would be made. The parking lot would be repaved with gravel or another historic material when staff time and funding became available. The 7,000-square-foot lot provides space for 6-8 cars and 1 bus.	The parking lot would be moved out of the direct line of the cemetery approach road and placed on adjacent lands if and when the NPS acquired them. The 10,000-square-foot lot would provide space for 20 cars and 1 bus. The lot would be screened with vegetation.
Cemetery Wall	No changes would be made. The wall would be cleaned and repointed when staff time and funding became available. The drainages would not allow stormwater to flow out of the cemetery.	The cemetery wall would be repaired and cleaned. Drainage would be improved by repairing and/or correcting outfalls in the cemetery wall and the selective placement of fill material to restore positive drainage and eliminate standing water.
Internal Circulation	No changes would be made. Access to the maintenance facility would continue to be shared with the main drive and the lodge.	Access to the maintenance facility would be diverted away from the main drive and screened with vegetation. Additional plantings would formalize the internal circulation pattern around the flagstaff loop.
Signs and Monuments	No changes would be made to the wayfinding signs in the cemetery. No new monuments would be added to the cemetery.	The wayfinding signs at the cemetery would be improved and made more accessible. Additional monuments and other features would be added to reflect the cemetery's intended historical appearance.
Lodge	No changes would be made to the lodge. Seasonal staffing would provide visitor contact and interpretation.	The lodge would be restored to its historic appearance. This would include the restroom building and the rostrum. The inside of the lodge would be renovated to support year round visitor contact services.
Infrastructure/Septic System	No changes would be made to the existing septic system, which includes a tank and open drain field in the cemetery grounds.	A new tank and septic field would be installed. The 11,500-square-foot septic field would be located outside the cemetery wall, south of the restroom.
Meets the Purpose and Need of the Proposed Action	<b>No.</b> No changes would be made to the conditions which hinder the ability to access, understand, and commemorate the cemetery.	<b>Yes.</b> Improvements would be made to the conditions at the cemetery that would allow for improved access, understanding, and commemoration of the cemetery.



## SUMMARY OF ENVIRONMENTAL CONSEQUENCES

Table 2 provides a summary of the environmental consequences related to each alternative. A more detailed explanation of the impacts is presented in “Chapter 4: Environmental Consequences.”

**Table 2: Summary of Environmental Consequences**

**For a complete description of impacts, see Chapter 4: Environmental Consequences.**

Resource	Alternative A: No-Action	Alternative B: Rehabilitation (NPS Preferred Alternative)
Cultural Landscapes	<p>No changes would be made to the condition of the resources within the cemetery. Intrusions on the cultural landscape from outside of the cemetery walls would remain.</p> <p><i>Overall impact:</i> minor, long-term, adverse with no impairment.</p> <p><i>Cumulative impact:</i> contributes a noticeable adverse increment to a moderate, long-term, adverse cumulative impact.</p>	<p>Improvements to resources inside and outside the cemetery walls would rehabilitate the cultural landscape. New grave markers would be installed and structures would be returned to their historic era appearance. Intrusions on the rehabilitated landscape would be screened as much as possible.</p> <p><i>Overall impact:</i> long-term, beneficial with no impairment.</p> <p><i>Cumulative impact:</i> contributes an appreciable beneficial increment to a long-term, beneficial cumulative impact.</p>
Historic Structures	<p>No improvements would be made to historic structures within or adjacent to the cemetery. The poor condition of many of the resources would threaten their integrity.</p> <p><i>Overall impact:</i> minor, long-term, adverse with no impairment.</p> <p><i>Cumulative impact:</i> contributes a noticeable adverse increment to a moderate, long-term, adverse cumulative impact.</p>	<p>The historic structures within the cemetery would be rehabilitated to reflect their condition at the end of the U.S. War Department era. New grave markers and other structures would be installed in the cemetery to enhance the integrity of the existing resources.</p> <p><i>Overall impact:</i> long-term, beneficial with no impairment.</p> <p><i>Cumulative impact:</i> contributes an appreciable beneficial increment to a long-term, beneficial cumulative impact.</p>

**Table 2: Summary of Environmental Consequences (continued)**

**For a complete description of impacts, see Chapter 4: Environmental Consequences.**

<p><b>Archeological Resources</b></p>	<p>No changes would be made within or adjacent to the cemetery. Poor drainage and tree root upheaval would represent a growing threat to archeological resources.</p> <p><i><b>Overall impact:</b></i> minor, long-term, adverse with no impairment.</p> <p><i><b>Cumulative impact:</b></i> contributes a noticeable adverse increment to a minor, long-term, adverse cumulative impact.</p>	<p>Drainage problems would be corrected to rectify impacts to archeological resources. Some of the tree upheaval would be addressed through thinning and new plantings. Care would be taken to avoid impacting unknown resources.</p> <p><i><b>Overall impact:</b></i> long-term, beneficial and minor, long-term, adverse with no impairment.</p> <p><i><b>Cumulative impact:</b></i> contributes an imperceptible beneficial increment to a long-term, beneficial cumulative impact.</p>
<p><b>Visitor Use and Experience</b></p>	<p>No changes would be made to the existing visitor experience. The entrance to the cemetery would not reflect the history or significance of the site. Many of the resources in the cemetery would remain in poor condition and not reflect their historic appearance or the intent of the designed landscape. The grave markers would continue to lay flush to the ground, preventing visitors from truly understanding the magnitude and significance of the cemetery.</p> <p><i><b>Overall impact:</b></i> moderate, long-term, adverse.</p> <p><i><b>Cumulative impact:</b></i> contributes an appreciable adverse increment to a moderate, long-term, adverse cumulative impact.</p>	<p>The cemetery would be rehabilitated to reflect its historic era. The cemetery entrance and parking lot would be repaved with historically accurate material. Buildings would be repainted and returned to their historic appearance. Interpretation and direction through the cemetery would be enhanced. New grave markers would provide the respect and understanding a national cemetery deserves.</p> <p><i><b>Overall impact:</b></i> minor, short-term, adverse and long-term, beneficial.</p> <p><i><b>Cumulative impact:</b></i> contributes an appreciable beneficial increment to a long-term, beneficial cumulative impact.</p>

**Table 2: Summary of Environmental Consequences (continued)**

**For a complete description of impacts, see Chapter 4: Environmental Consequences.**

<b>Operations and Infrastructure</b>	<p>No changes would be made to existing operations and infrastructure at the cemetery. The infrastructure would remain in poor condition and not reflect its intended appearance. Operations would be limited to seasonal visitor contact staffing and maintaining the cemetery lawn.</p> <p><i>Overall impact:</i> minor, long-term, adverse.</p> <p><i>Cumulative impact:</i> contributes a noticeable adverse increment to a moderate, long-term, adverse cumulative impact.</p>	<p>Existing infrastructure would be rehabilitated to meet its intended appearance. New infrastructure would be installed to support interpretation, education, and visitor contact services. Operations would be modified to possibly provide additional visitor contact staffing and more time would be required to maintain the cemetery.</p> <p><i>Overall impact:</i> minor, short-term, adverse and long-term, beneficial.</p> <p><i>Cumulative impact:</i> contributes an appreciable beneficial increment to a long-term, beneficial cumulative impact.</p>
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## ENVIRONMENTALLY PREFERRED ALTERNATIVE

In accordance with DO 12 and NEPA, the NPS is required to identify the environmentally preferred alternative in its NEPA documents. The CEQ defines the environmentally preferred alternative as the alternative that will promote the national environmental policy as expressed in NEPA’s Section 101. In their Forty Most Asked Questions, CEQ further clarifies the identification of the environmentally preferred alternative, stating “Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources” (Q6a).

Alternative B: Rehabilitation (NPS Preferred Alternative) best protects the resources of the cemetery by rehabilitating degraded features and returning the landscape to its 1933 historic and commemorative appearance. This alternative would improve the visitor experience without adversely impacting natural or cultural resources. The rehabilitation of the cemetery would protect this resource for future generations and enhance their greater understanding and appreciation of the resource. Based on the analysis of environmental consequences of each alternative, as presented above and in Chapter 4, Alternative B is the environmentally preferred alternative.

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# 3

## AFFECTED ENVIRONMENT

Poplar Grove National Cemetery is situated in Dinwiddie County in the westernmost portion of Virginia's Inner Coastal Plain physiographic province, just south of the City of Petersburg. The cemetery, approximately 8 acres in size, is rich in cultural resources that reflect the various periods of improvements and less intended conditions during its administration initially by the U.S. War Department and later by the NPS. The proposed actions are confined to the project area, which includes the cemetery approach road, parking lot, the area immediately surrounding the cemetery wall, and the cemetery itself. Organized by resource topic, this chapter describes the resources that could be impacted by the proposed action. Resources examined in detail include cultural landscapes, historic structures, archeological resources, visitor use and experience, and operations and infrastructure. Resources dismissed from further consideration are discussed in "Chapter 1: Purpose and Need."

### CULTURAL LANDSCAPES

Poplar Grove National Cemetery is a significant cultural landscape within Petersburg National Battlefield. The cultural landscape of the cemetery is fully described and evaluated in the *Cultural Landscape Report for Poplar Grove National Cemetery* (Olmsted Center 2009). The cemetery cultural landscape includes both natural and built features that are intended to evoke respect, dignity, and honor for the veterans buried here from 1866 through 2003. Although the cultural landscape has evolved since the cemetery's establishment in 1866, the cultural landscape retains integrity of location, design, setting, materials, workmanship, and association. Character-defining features that remain include its approach road and main drive leading into the cemetery, burials in concentric circles around the central flagstaff, maintained lawn, specimen trees and other landscape plantings, drives, walkways, support buildings, and a brick inclosure wall with iron and granite entrance gates. The cultural landscape also includes an adjacent 3.7-acre tract of land purchased by the federal government in 1991 and the adjacent land to the north, east, and south that is not owned by the NPS, but which forms part of the cemetery's setting.

As initially developed, circulation was a conspicuous characteristic of Poplar Grove National Cemetery, but as the landscape changed through the late 19th century, the circulation system within the burial grounds became less visible due to changes in materials. The central circulation feature of the cemetery historically remains the approach road and the main drive.

The 1,025-foot long cemetery approach road dates to the original cemetery design and may have been constructed prior to the cemetery to serve the Civil War camp of the 50th New York

Volunteer Engineers. The road was maintained with a gravel surface, approximately 11 feet wide, with grass shoulders and bordered by an allée of deciduous trees set out in 1879. The approach road surface was covered in asphalt in 1931 and is periodically repaved. A private driveway, leading to two circa 1972 houses, now intersects the approach road. Although the allée of trees has declined, overall the approach road retains the alignment and surface that characterized it at the very end of the historic period (Olmsted Center 2009).

The main drive continues from the approach road into the cemetery and loops around the flagstaff in the cemetery's center. The main drive was originally surfaced in gravel and lined by brick gutters. Circa 1872-74, the surface of the main drive was changed to turf along with all other drives in the cemetery. The brick gutters were filled and covered in turf in 1877. In about 1900, the main drive was set apart as a distinct drive in the cemetery when its surface was changed back to gravel. In 1931, the main drive was paved in asphalt with a gravel top coat. As part of the paving project, the alignment of the center circle was changed into a tear-drop shape. This change in alignment, although done during the historic period, detracts from the circular symmetry of the cemetery. Since the end of the historic period, the drive has been widened in front of the lodge and in 2003 was repaved with gravel top coat. Overall the main drive retains its character from the very end of the historic period.

The drives within the burial grounds (also known as walks) are the primary, wider circulation routes within the cemetery. The drives were built between 1866 and 1869 with gravel surfaces and brick gutters. Between about 1872 and 1874 the surface of the drives was changed to turf and in 1877 the brick gutters were filled in and covered in turf. With these changes, the drives became subtle features in the landscape, defined only by the voids between grave sections. They were visually more distinct when the stones were upright. The drives continue to exist as circulation corridors and remain largely intact, reflecting conditions in the latter half of the historic period (Olmsted Center 2009).

The burial ground walks, built between 1866 and 1869, within the cemetery are secondary, narrower circulation routes between the grave rows. The walks were surfaced in turf as an extension of the cemetery lawn. Despite the loss of the definition of the walks when the grave markers were altered, the walks as circulation corridors remain largely intact and with the same surface that they have had throughout the historic period (Olmsted Center 2009).

The walk from the lodge to the public restroom was built in 1929 when the public restroom was constructed. This 3-foot wide concrete walk extends from the east wing of the lodge back to the restroom. In about 1970, the walk was closed when a fence enclosing the back yard of the lodge was constructed. At this time, a dirt path to the public restrooms was created along the east side of the lodge. The restroom walk remains intact and is a minor feature of the historic landscape.

## **SMALL-SCALE FEATURES**

The Civil War-type marble headstones and blocks date to 1877 and comprise approximately 95% of all markers in the cemetery. The grave markers have simple segmental tops with a sunken shield below. The blocks, or square posts, mark unknown burials. There were originally a total of 2,200 headstones and 3,335 blocks. There are also a small number of nongovernment issued

grave markers within the cemetery, and a few plain tablets that do not conform to standard government-issued grave markers. The Civil War-type markers were considerably modified in 1934 when the stones were cut down and laid flush with the ground in an effort to reduce maintenance. After the end of the historic period and the alteration of the Civil War grave markers, the NPS used a new type of government-issued rectangular headstone designed to lie flush with the ground. There are about 216 of these rectangular markers scattered around the cemetery.

The grave markers of all types and underlying graves have been found eligible for the National Register under Criteria A and C. Many of the stones are in poor condition due to weathering, upheaval by nearby tree roots, and chipping. The deteriorated condition of the grave markers detracts from the honor and respect shown to the veterans. Grave markers at National Cemeteries administered by the Department of Veterans Affairs are traditionally replaced when a deteriorated or altered condition does not allow proper identification of the grave or dishonors the veteran (Olmsted Center 2009).

The central gun monument consists of an upright cannon tube with a pyramidal stack of cannon balls set on a concrete pad. The gun monument is located to the north of the flagstaff along the outer edge of the main drive loop. The central gun monument is the only extant monument out of four original gun monuments located around the flagstaff. The missing three gun monuments were removed around 1974. The remaining gun monument is intact although its bronze shield has been painted black and is difficult to read. The loss of the three other gun monuments detracts from the historic character of the landscape (Olmsted Center 2009).

Alterations to the cemetery landscape design including, but not limited to, cutting and placing the grave markers flush with the ground, changing the main drive alignment, shortening the height of the flagstaff, adding a small parking lot at the cemetery entrance and a new private driveway extending from the approach road, and loss of plantings within the inclosure and the growth of successional woods outside the inclosure, have diminished the integrity of the cemetery landscape.

## **HISTORIC STRUCTURES**

Existing historic structures within or associated with the cemetery date from the initial establishment of the cemetery or from the later years of the historic period. Most (or all) of these structures have received some level of alteration since their original construction, but are all considered contributing elements to the resource.

The brick cemetery inclosure wall and entrance gateway completed in 1877, replaced a white-painted wood paling fence. The four-foot high brick walls are composed of brick pilasters with sandstone and concrete caps that alternate with long paneled sections. The entrance gateway consists of granite posts with two pedestrian gates flanking the central vehicular gate. At eight locations, openings in the brick wall were made for drainage. The original eight drainage outlets are not functioning properly in some areas. The wall was covered with ivy from approximately 1888 until 1957. Today the wall is spattered with dirt, moss, and stains from water damage, but retains its character-defining features.

The cemetery lodge is a Second Empire one and a half-story stone rectangular building with a mansard roof. The lodge functioned historically as the residence of the cemetery superintendent. Changes to the lodge include the circa 1931 metal covering on the lower slope of the original slate-covered roof, concrete porch deck which replaced the original wood flooring, and addition of aluminum triple track storm windows. A stucco-finished one-story addition was built on the rear of the building in 1914. The lodge is similar in style and overall plan and details to the lodges at Richmond, Fort Harrison, Cold Harbor, Seven Pines, Yorktown, and Culpeper National Cemeteries (Olmsted Center 2009). Located just inside the cemetery gates, the lodge now serves as a visitor contact station when staff is available.

The garage and restroom, known historically as the outbuilding and utility building respectively, both date to 1929. These buildings have rectangular plans, gable roofs, stucco exteriors, and display simple Colonial Revival styling. The one and a half-story garage building at the northeast corner of the service yard at the cemetery entrance was originally screened by an arbor vitae hedge but is now visible from the entrance due to the removal of the hedge. Alterations to the building include a new garage door on the front façade and a steel stairway on the west. The one-story restroom is located behind (south of) the lodge. Other than painting the building exterior white, there have been no substantial changes to the building since the historic period. Both the garage and the public restroom are characteristic of the style of buildings constructed by the War Department at national cemeteries during the early 20th century (Olmsted Center 2009).

The 1897 iron rostrum, located east of the lodge in an open lawn area, is set on a red brick octagonal base which is surmounted by elongated iron posts that support an eight-sided flared iron roof. A set of iron steps with an ornate railing leads up to the pavilion. The rostrum is currently painted black, although originally it would have been black with a red roof and light blue ceiling, in conformance with National Cemetery regulations. The rostrum was a standard design matching the rostrums at Richmond and Yorktown National Cemeteries among others. Aside from changes in color, the rostrum remains intact and is a rare-surviving example of its type (Olmsted Center 2009).

## **ARCHEOLOGICAL RESOURCES**

The 2007 Phase I archeological survey of Poplar Grove National Cemetery consisted of two components (A.D. Marble and Company 2008). In October 2007, a geophysical survey was done within four 100 foot by 100 foot blocks within each of the four sections of the cemetery. In November 2007, the geophysical work was followed up by limited excavation of two 10 foot by 20 foot test areas within two of the larger geophysical plots.

A ground penetrating radar (GPR) survey was particularly successful in clearly delineating grave locations, depths, and length and orientation of grave shafts. Radar, verified by excavation to the depth of the top of the grave shaft, indicated that the existing gravestones were placed relatively close to the head of the grave, were usually aligned with the grave, and could be assigned to a specific grave. However, in some locations, stones were placed between two graves, were placed several feet above the head of the grave shaft, were placed off-center from the center-line of the grave shaft, or were even placed on top of the grave shaft rather than at its head. Graves were at varying distances from each other within rows, and the graves seemed to vary in depth. A few



graves were even placed in a circular path and were not marked, or were perhaps moved to a “proper” location and re-buried once the mistake was realized. Although the burials were oriented to the center of the cemetery in a general fashion, the graves were initially dug in groups that reflected slightly different spatial orientations from neighboring groups.

Additionally, neither the geophysical exploration nor the archeological investigation was able to recover evidence of the original 1867-69 placement of wooden grave markers, or the 1877 placement of upright grave stones. It is possible that the existing stones were so carefully placed that the original marker shafts lie underneath them and would be evident if the stones were removed.

The artifacts recovered during the excavations reflect four periods: prehistoric (a single quartzite flake), the 19th century owners of the property, the Civil War era, and 20th century visitation. The placement of the cemetery likely destroyed the integrity of sites related to earlier occupation at this location, but it is possible that small intact features still survive in areas between cemetery features.

Outside of the cemetery wall, the likelihood of archeological sites diminishes as distances increase from the engineer’s camp, the historic farmstead to the west of the allée road, and the headwater drainage to the east of the cemetery. Outlying features such as privies, garbage pits, and picket lines from the engineer’s camp may remain in the periphery. Outlying features for the historic farmstead may include secondary barns, gardens, or other landscape elements. Finally, the uplands immediately adjacent to the headwater drainage would have been a preferred location for prehistoric and early EuroAmerican occupations and could contain resources related to these groups.

## **VISITOR USE AND EXPERIENCE**

The Petersburg NB GMP states that the primary purpose of the cemetery is to “commemorate the valor and sacrifice” of the more than 6,100 soldiers who died during the Civil War (NPS 2004). As such, this section of the park is meant to provide a contemplative and respectful atmosphere in which visitors can understand and connect with the history and cultural context of the cemetery.

The cemetery is set among low-density suburban and agricultural development. Visitors access the cemetery via Vaughan Road, a two-lane state road that connects with the Petersburg NB’s Siege Line Tour (Flank Road), approximately half a mile north of the cemetery. The cemetery is open to visitors during regular park hours (9:00 a.m. to 5:00 p.m.).

As visitors draw near the cemetery approach road on Vaughan Road, there is a standard brown park sign indicating the entrance on the south side of the approach road and a cluster of private mailboxes on the north side. Although the road is lined by trees of various age and species, the vegetation does not consistently screen the surrounding area. The limited screening provides glimpses of the adjacent agricultural fields and surrounding roads. A private driveway joins the cemetery approach road before it reaches the parking lot.

Upon reaching the end of the approach road, visitors are provided views of the surrounding agricultural fields, a small private graveyard, and the cemetery parking lot, which sits in front of the cemetery gates. The southern side of the parking lot area opens to a field surrounded by a split-rail fence, with a barn approximately 500 feet away. The northern side of the parking lot is lined with a mixed pine-hardwood stand of trees screening visitors from traffic on Vaughan Road. The parking lot is unmarked but provides space for eight standard-sized automobiles (including one handicap space). There also is space for two oversized vehicles, such as commercial buses or cars with trailers. Although the asphalt approach road and parking lot were covered with a gravel topcoat to create a more historic appearance, much of the sand has washed away or is isolated in low spots on the pavement.

The cemetery is completely enclosed by a brick wall standing approximately 4 feet tall. The red bricks are repeatedly interrupted by dirt and moss. In many locations, the poor condition of the masonry is evident. The approach road continues into the cemetery through a wrought-iron gate, which is kept closed to prevent unauthorized vehicles from gaining access to the cemetery. There are two pedestrian gates on either side of the vehicle gate. The concrete pylons on either side of the vehicle gate bear cast metal shields with the inscription "U. S. National Cemetery." These pylons provide the first sign of the history and importance of the cemetery.

Immediately inside the cemetery gates, the former superintendent's lodge serves as a visitor contact station during the summer months. The lodge's historic appearance has been modified over the years, and the lack of signs or regular park staff suggests that it is not part of the cemetery experience. The large gravel expanse at the cemetery gate connects the lodge with the maintenance building. The building is not screened from view and further suggests that the visitor experience, and the history of the cemetery, begins further down the main drive, as the gravel path narrows and passes the rostrum.

When funding and staff are available, seasonal park employees are stationed in the superintendent's lodge to assist visitors in locating specific grave markers and understanding the history of the site. When no park staff is available to assist with interpretation of the cemetery, visitors must continue past the lodge and into the cemetery. When the cemetery is open, regardless of staffing, restrooms are available in a separate building along the back of the lodge.

As visitors walk along the main drive, numerous gravestones are visible. The inscriptions are still visible on most markers, though some are heavily weathered. Because these stones are flush to the ground, the visitor has no understanding of their arrangement, number, or how to reach a specific grave. Upon reaching the flagstaff at the center of the cemetery, visitors are able to view two large aluminum signs. One sign provides a brief history of the site, while the other is a burial register. The register provides the location of graves through a series of lettered quadrants. These quadrants are labeled with small iron markers with raised letters identifying the respective radiating walkways. The small iron markers are not noticeable, as the radiating walkways are lost among the grave markers.

Alongside the flagstaff, there is one cannon monument providing some connection to the military history of the cemetery. From this point, visitors are able to walk among the graves to pay their respects, identify a specific grave, or take in the magnitude of interments that are contained

within the cemetery walls. There are no benches available for visitors within the cemetery. Therefore guests must return to their vehicles to rest.

## **OPERATIONS AND INFRASTRUCTURE**

The cemetery is open to the public year-round during regular park hours (9:00 a.m. to 5:00 p.m.). Year-round staffing is not provided; however, NPS staff open and close the cemetery gates each day and conduct routine security patrols. A park ranger is available, on a part-time basis from mid-June through mid-August, to provide interpretation and assist with inquiries. Maintenance activities based out of the cemetery are focused on maintaining the lawn. There is currently no dedicated staff, but on average three to five park staff or inmates routinely mow and clean the site once every three weeks from April to November (Olmsted Center 2009). When staff and funding are available, additional work is carried out to maintain the cemetery wall and other structures.

The asphalt approach road that provides access to the cemetery from Vaughan Road is approximately 11 feet wide and 1,025 feet long. The gravel that was used to cover the approach road has worn thin in many places, creating small ruts and ridges. The approach road extends from Vaughan Road to the cemetery parking lot.

Like the approach road, the parking lot has an asphalt base with gravel spread unevenly across it. There are eight spaces for standard-sized automobiles (including one handicap space). There also is room for two oversized vehicles (such as commercial buses or cars with trailers) to park parallel to the northern side of the parking lot, against the woods.

A wrought-iron and granite gate provides access to the cemetery through the brick wall that encloses the site. The gate includes a vehicular entrance flanked by narrower pedestrian entrances. The brick wall is approximately 4 feet tall and is spotted with moss, areas of missing mortar, and spalled bricks from water infiltration problems. At eight low points along the brick wall, there are drain pipes that were designed to convey stormwater out of the cemetery. Over time, these drainages have become clogged with debris and erosion outside of the wall has altered the topography, preventing the natural movement of water out of the cemetery. Inside the main gate, two buildings sit alongside the cemetery wall. The lodge sits to the right and the maintenance building sits to the left, with a gravel lot spanning the area between them. When funding and staff are available, seasonal NPS employees are stationed in the lodge to provide visitor contact. The lodge is a one and one-half story, Second Empire-style, stone building that was constructed in the 1870s. This building was originally designed as a residence for the cemetery superintendent but is currently used to support visitor contact activities. Adjacent to the lodge, a 24 foot by 14 foot Colonial Revival-style building houses utilities and restrooms (Olmsted Center 2009). A dirt path connects the entrance to the restrooms with the cemetery's main drive. The buildings are served by a small septic system that was constructed in 1974 to serve a single-family residence. The system consists of a small tank located north of the restrooms and an open drain field that extends southwest through the cemetery (see Figure 2).

Maintenance operations at the site are based out of a garage building measuring 38 feet by 22 feet. The building was constructed at the same time as the restrooms to replace earlier buildings

(Olmsted Center 2009). Staffing at this building occurs only when maintenance operations are being conducted. Both buildings are closed and locked when staff is not present.

To the east of the lodge, the cemetery's rostrum sits on the maintained lawn. This rostrum, known more commonly as a bandstand, is an octagonal structure 16 feet in diameter. The structure was constructed in 1897 and currently serves as the setting for Memorial Day functions and other similar occasions (Olmsted Center 2009).

The main drive extends from the entrance of the cemetery to the flagstaff at the center of the site. The main drive is paved with asphalt and covered by a thin layer of gravel that has worn away in most areas. The drive is approximately 11 feet wide and forms an uneven boundary with the lawn that covers the cemetery.

At the center of the cemetery, a flagstaff flies an American flag and is lighted by spotlights which are screened by small boxwoods. Alongside the circular portion of the main drive is the last remaining cannon monument. The other guns were sent to another Civil War park. Two brushed aluminum signs, 6 feet tall by 4 feet wide, flank the flagstaff. One sign provides historic background on the site, while the other is a burial register with the location of specific graves. The locations are designated by quadrants labeled A through F. These quadrants are marked by small iron signs with raised letters identifying the respective radiating walkways. These markers measure 4 inches by 5 inches and are mounted on a low (less than 1 foot high) pipe pole (Olmsted Center 2009).

Throughout the cemetery, there are approximately 5,615 grave markers. All of the grave markers are either flush or nearly flush to the ground. The two dominant types of markers present at the site are Civil War-type recessed shield headstones for known burials and square blocks for unknown burials. Graves of known soldiers are inscribed with their name, state, and in some cases, their rank. Unknown block markers are inscribed with a number that is used to denote its location on the burial register. The inscriptions are still visible on most markers, though some are heavily weathered. Nearly all are damaged due to exposure and mowing (Olmsted Center 2009).

# 4

## ENVIRONMENTAL CONSEQUENCES

This chapter describes the environmental consequences associated with the alternatives presented in “Chapter 2: Alternatives.” It is organized by impact topic, which distills the issues and concerns into distinct subjects for discussion analysis. NEPA requires consideration of context, intensity, and duration of adverse and beneficial impacts (direct, indirect, and cumulative) and measures to mitigate adverse impacts. NPS policy also requires that impairment of resources be evaluated in all environmental documents; therefore, impairment is addressed in the “Conclusions and Findings on Impairment” section under each impact topic.

### GENERAL METHODOLOGY FOR ASSESSING IMPACTS

Potential impacts are described in terms of type (beneficial or adverse), context (site-specific, local, or regional), duration, and level of intensity (negligible, minor, moderate, or major). Both indirect and direct impacts also are described; however, they may not be identified specifically as direct or indirect. These terms are defined below. Overall, these impact analyses and conclusions were based on the review of existing literature and studies, information provided by on-site experts and other government agencies, professional judgments, and park staff insight.

#### TYPE

Impacts can be beneficial or adverse. Beneficial impacts would improve resource conditions, while adverse impacts would deplete or negatively alter resources.

- Beneficial:** A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.
- Adverse:** A change that moves the resource away from a desired condition or detracts from its appearance or condition.
- Direct:** An impact that is caused by an action and occurs at the same time and place.
- Indirect:** An impact that is caused by an action but is later in time or farther removed in distance, but still reasonably foreseeable.

## CONTEXT

Context is the setting within which an impact occurs and can be site specific, local, parkwide, or regionwide. Site-specific impacts would occur at the location of the action, local impacts would occur within the general vicinity of the project area, parkwide impacts would affect a greater portion outside the project area yet within the park, and regionwide impacts would extend beyond park boundaries.

**Site specific:** The impact would occur within project site.

**Local:** The impact would occur within the general vicinity of the project area.

**Parkwide:** The impact would affect a greater portion outside the project area yet within the park.

**Regional:** The impact would affect localities, cities, or towns surrounding the park.

## DURATION

Impacts can be either short-term or long-term. A short-term impact would be temporary in duration and would be associated with the construction process. Depending on the resource, impacts would last as long as construction was taking place, or up to one year after construction is completed. Long-term impacts last beyond the construction period, and the resources may need more than one year postconstruction to resume their preconstruction condition. Impact duration for each resource may differ and is presented in further detail for each resource topic, if applicable.

**Short-term:** Impacts that occur only during construction or last less than one year.

**Long-term:** Impacts that last longer than one year.

## LEVEL OF INTENSITY

Impact intensity is the degree to which a resource would be adversely affected. Beneficial impacts are described but are not assigned a level of intensity. Because the level of intensity definitions (negligible, minor, moderate, major) vary by resource, separate definitions are provided for each impact topic analyzed.

## CUMULATIVE IMPACT SCENARIO

Cumulative impacts are defined as impacts which result when the impact of the proposed action is added to the impacts of other present and reasonably foreseeable future actions, regardless of what agency (federal or nonfederal) or person undertakes such other actions (40 CFR 1508.7).

To determine the potential cumulative impacts, existing and anticipated future projects at the cemetery and in the surrounding area were identified. These included lands administered by the NPS, the Commonwealth of Virginia, Dinwiddie County, and the city of Petersburg. Potential projects identified as cumulative actions included any planning or development activity currently being implemented or expected to be implemented in the reasonably near future. The projects identified as contributing to cumulative impacts on the resources addressed by this EA include

previous management of the cemetery, previous and future development in the vicinity of the cemetery, and further implementation of the park's GMP.

### **Previous Management of the Cemetery**

As noted earlier in this document, the cemetery was established in 1866. Petersburg NB was not created until 1926. Administration of the cemetery, together with Petersburg NB, was transferred from the U.S. War Department to the NPS on August 10, 1933. The grave markers were cut and set flush with the ground in February and March of 1934 after the period of U.S. War Department administration. This was done to ease the maintenance requirements. Since the U.S. War Department transferred administration of the cemetery to the NPS in 1933, the landscape of the cemetery has undergone numerous changes that have altered its historic character and visual relationship to the historic national cemetery system. These actions have and would continue to have the potential to impact cultural landscapes, historic structures, visitor use and experience, and operations and infrastructure.

### **Previous and Future Development**

Since the cemetery was designed, the area that surrounds it has undergone varying levels of development. In some areas, the land remains undeveloped or as agricultural lands. Other adjacent properties have been developed for residential use. Beyond the immediate neighboring properties, residential and commercial development continues to occur. This has resulted in increased traffic on Vaughan Road and the surrounding road network. While these improvements have changed the historic character of the region, they have provided improved services for NPS staff and visitors. These projects have and would continue to have the potential to impact cultural landscapes, historic structures, archeological resources, and visitor use and experience.

### **Implementation of the Petersburg NB GMP**

In 2004, Petersburg NB adopted its new GMP. The GMP will guide park planning for the next 15-20 years. The GMP included plans developed in this EA. Other plans include additional land acquisition, further improvements to the visitor experience, and continued resource protection activities. These projects have the potential to impact cultural landscapes, historic structures, archeological resources, visitor use and experience, and operations and infrastructure.

### **Cumulative Impact Contribution Terminology**

In defining the contribution of each alternative to cumulative impacts, the following terminology is used:

<b>Imperceptible:</b>	The incremental effect contributed by the alternative to the overall cumulative impact is such a small increment that it is impossible or extremely difficult to discern.
<b>Noticeable:</b>	The incremental effect contributed by the alternative, while evident and observable, is still relatively small in proportion to the overall cumulative impact.

**Appreciable:** The incremental effect contributed by the alternative constitutes a large portion of the overall cumulative impact.

## **FINDINGS ON IMPAIRMENT OF PARK RESOURCES AND VALUES**

As stated in *NPS Management Policies 2006*, section 1.4.7: “Before approving a proposed action that could lead to an impairment of park resource and values, an NPS decisionmaker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values. If there would be an impairment, the action must not be approved.”

As stated in *NPS Management Policies 2006*, section 1.4.5: “The impairment that is prohibited ... is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values....

An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in establishing legislation or proclamation of the park,
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park’s general management plan or other relevant NPS planning documents as being of significance.”

Impairment may result from NPS activities in managing the park, as well as visitor activities or activities undertaken by concessioners, contractors, and others operating in the park. An impairment finding for relevant impact topics is provided in the “Conclusions and Findings on Impairment” section under each impact topic. An impairment finding is not provided for visitor use and experience or operations and infrastructure because impairment findings relate back to park resources and values, and these impact topics are not generally considered park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values.



## **CULTURAL LANDSCAPES**

### **METHODOLOGY**

Cultural landscapes are the result of the long interaction between people and the land, and the influence of human beliefs and actions over time upon the natural landscape. Shaped through time by historical land-use and management practices, as well as politics and property laws, levels of technology, and economic conditions, cultural landscapes provide a living record of an area's past, as well as a visual chronicle of its history. For purposes of analyzing potential impacts on cultural landscapes, the thresholds of change for the intensity of an impact are defined as follows:

<b>Negligible</b>	Impact is at the lowest levels of detection.
<b>Minor</b>	Alteration of a pattern(s) or feature(s) of the landscape would not diminish the overall integrity of the landscape.
<b>Moderate</b>	Alteration of a pattern(s) or feature (s) of the landscape would diminish the overall integrity of the cultural landscape.
<b>Major</b>	Loss of a pattern(s) or feature (s) of the landscape would diminish the overall integrity of the landscape.

### **IMPACTS OF ALTERNATIVE A: NO-ACTION**

#### **Impacts**

Under Alternative A, no action would be taken to rehabilitate the character-defining features of the cemetery's cultural landscape. The private driveway on the north side of the cemetery approach road and its associated mailboxes would remain at the site. The cemetery parking lot would continue to sit between the approach road and the cemetery gates. These conditions are not part of the original cemetery design, which was intended to present a formal and solemn entry. The unorganized mix of tree types framing the cemetery approach road would not be thinned or replanted to replicate the historic formal allée of trees, which previously contributed to an understanding of the cemetery's identity and promoted a sense of honor and respect.

The drainage issues, which are affecting the physical integrity of the cemetery wall and some of the graves, would not be addressed. Portions of the wall are in poor condition due to loose and deteriorated mortar and settling, and some grave sites are subject to long periods of standing water. If these conditions persist, these important features would continue to deteriorate and potentially alter the overall integrity of the cultural landscape.

Within the cemetery, the main drive and other walks would not be changed. Maintaining these orientations, locations, or paving materials would not present the cemetery landscape as it was intended. Vegetation within the cemetery would be minimally maintained and none of the former plantings that characterized the cultural landscape would be restored. The scarcity of trees in

some areas surrounding the cemetery, and the overgrowth of woods in other adjacent areas, would continue to be unaddressed.

Under Alternative A, all of the grave markers for known burials would continue to lie flush with the ground. This positioning would continue to diminish the cemetery's historic appearance, as the alternative would not return the stones to their historic upright position. This would not provide the respect owed to the men buried in the cemetery. Although the NPS would clean and re-incise the stones as funding and staff became available, the majority of the grave markers would continue to exhibit a weathered and chipped condition that also is not in conformance with NCA policy. The continued loss of integrity of the grave markers also would detract from the dignity of the cemetery landscape.

Small historic amenities that contributed to the cultural landscape, including historic signs, wood-slat benches, and gun monuments, would remain absent under Alternative A. The flagstaff, currently at approximately half of its circa 1931 80-foot height, would remain at this height and would not be visible from Vaughan Road and the cemetery's approach road. The continued lack of the flagstaff in distant views to the cemetery would not be consistent with its designed landscape and appearance.

None of the historic buildings at the cemetery, including the lodge, utility buildings, or the rostrum, would receive upgrades to restore their historic appearance, detracting from the historic character of the landscape and its elements.

Because the cemetery does not meet park cemetery standards but the cultural landscape retains some level of integrity, Alternative A would result in a minor, long-term, adverse impact on cultural landscapes. Park staff would continue to take care of the cemetery and its character-defining features as funding and staff became available to minimize any loss of integrity.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on cultural landscapes in and around the cemetery. These projects include previous management of the cemetery, previous and future developments in the vicinity of the cemetery, and implementation of the Petersburg NB GMP. Previous management of the cemetery has included the cutting of grave markers, removal of small-scale features, and changes to and/or deterioration of historic structures. These changes diminished the dignified atmosphere and historic integrity that is appropriate for the cemetery. Past development has created visual intrusions on the cultural landscape at the cemetery. Future development could create additional intrusions, diminishing the integrity of the resource. Implementation of the GMP, however, would seek to protect the cultural landscape at the cemetery and throughout Petersburg NB. These improvements would include enhancing educational and interpretive programs to explain the significance of the park to visitors. It also would include following plans for additional land acquisition. Land acquisition would not only bring historic properties under NPS protection but would allow the park to develop buffers around important properties. At the cemetery, this could mean acquiring lands to separate the resource from increasing residential and future development. This would protect the cultural landscape from future intrusions. These projects,

along with Alternative A, would have a moderate, long-term, adverse cumulative impact on cultural landscapes. Alternative A would contribute a noticeable adverse increment to this cumulative impact.

## **IMPACTS OF ALTERNATIVE B: REHABILITATION (NPS PREFERRED)**

### **Impacts**

Under Alternative B (NPS Preferred Alternative), proposed rehabilitation efforts would substantially contribute to the improvement of the cultural landscape to its historic 1933 appearance. Many of the character-defining elements of the cultural landscape would be rehabilitated or restored to their appearance at the end of the U.S. War Department era (1869-1933), for which substantial documentation exists. These improvements would include the removal of distracting elements and the restoration of missing features.

Relocating the connection to the private driveway from the cemetery approach road and removing its attendant mailboxes would visually restore the dignity and primary function of the approach to the cemetery entrance. The thinning of select forested areas and the restoration of the historic tree allée along the cemetery approach road also would contribute to the formality and historic appearance of the road. Resurfacing of the cemetery approach road with a historic asphalt surface would restore the thoroughfare to its early 20th century appearance. The potential removal of the 1995 parking lot from the front of the cemetery entrance to an area further away, but still accessible, would substantially improve and restore the cemetery entrance's historic appearance. The installation of the new septic field would result in some short-term impacts on the cultural landscape, as the open space outside the cemetery wall was disrupted. Once construction was complete, this disruption would not exist and the landscape would reflect its improved condition.

Repair to the drainages along the cemetery wall would not only restore the historic appearance of the topography, but would help correct the water infiltration issues that have resulted in damage to the wall and the grave sites. Once these measures are performed, the repair of the cemetery wall, which would include brick repair or replacement and re-pointing, to meet the Secretary of the Interior's Treatment of Historic Properties standards, would aid in the wall's stability and long-term condition. Although the cemetery wall was covered in ivy during the U.S. War Department Era of 1869-1933, this treatment would not be re-created due to its previous damage to the bricks and mortar. Repairing the wall and correcting drainage issues would improve the integrity of the cultural landscape.

Within the cemetery walls, the restoration of the circular loop around the flagstaff and the resurfacing of the main drive would further contribute to the rehabilitation of the cemetery. This effort would be enhanced by the removal of the nonhistoric path on the east side of the lodge that leads to the restroom and the narrowing of the service drive to retain a magnolia tree. A new universally accessible walkway on the west side of the lodge would follow the alignment of a path shown on the 1892 Quartermaster general plan, which was likely removed circa 1929. The planting of new trees and shrubs within the cemetery and the possible installation of a boxwood

hedge in the shape of a Maltese cross are other proposed measures that would contribute to the rehabilitation of the cultural landscape. Additional vegetative screening would improve historic viewsheds within and adjacent to the cemetery.

Installation of new upright grave markers would provide the most profound improvement to the integrity of the cemetery's cultural landscape. The view of the thousands of grave markers from within the cemetery, which are a visual reminder of the sacrifices of the men buried there, would be restored as a result of this effort. While disposition of the existing grave markers would need to be determined, this decision would be made in consultation with the Virginia SHPO, NCA, and other interested parties.

Various small-scale elements would be restored to the cemetery, adding valuable accents to the cultural landscape and historic views. These elements include a historically accurate flagstaff in the center of the cemetery, which would be visible again from Vaughan Road and the cemetery approach road. The three missing gun monuments, previously located next to the flagstaff, would be reinstalled or re-created. This would contribute to the cultural landscape's 1933 appearance. The landscape's historic appearance also would benefit from the addition of wood-slat benches that recall the 1870s bench design. Removal of the 1950s signs at the flagstaff, installation of a new grave locator system and cemetery identification signs, and placement of the historic iron welcome tablet on the west side of the lodge would further improve the rehabilitation of the 1933 appearance of the landscape.

The 1933 paint schemes, which followed the National Cemetery Regulations from 1931, would be used in the proposed rehabilitation of the cemetery's historic buildings. This improvement, along with slight removals of more recent elements on the lodge, would substantially enhance the historic appearance of the cultural landscape.

Because Alternative B proposes several actions that would rehabilitate the cemetery's cultural landscape, including the areas surrounding the cemetery inclosure wall, Alternative B would result in a long-term, beneficial impact on cultural landscapes.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on cultural landscapes in and around the cemetery. They are described above under Alternative A and include previous management of the cemetery, previous and future developments in the vicinity of the cemetery, and implementation of the Petersburg NB GMP. These projects, along with Alternative B, would have a long-term, beneficial cumulative impact on cultural landscapes. Alternative B would contribute an appreciable beneficial increment to this cumulative impact.

### **CONCLUSIONS AND FINDINGS ON IMPAIRMENT FOR CULTURAL LANDSCAPES**

Because the cemetery does not meet cemetery standards but the cultural landscape retains some level of integrity, Alternative A would result in a minor, long-term, adverse impact on cultural

landscapes. Park staff would continue to take care of the cemetery and its character-defining features as funding and staff became available to minimize any loss of integrity. Because of the adverse impacts, Alternative A would contribute a noticeable adverse increment to a moderate, long-term, adverse cumulative impact on cultural landscapes. Alternative A would not result in impairment, as park staff would continue to maintain the cemetery landscape as funding became available and would not allow the resources to further deteriorate and lose integrity.

Because Alternative B proposes several actions that would rehabilitate the cemetery's cultural landscape, including the areas surrounding the cemetery inclosure wall, Alternative B would result in a long-term, beneficial impact on cultural landscapes. Alternative B would contribute an appreciable beneficial increment to a long-term, beneficial cumulative impact on cultural landscapes. Implementing Alternative B would not result in impairment of cultural landscapes because the alternative would rehabilitate the cultural landscape and result in beneficial impacts.

## **HISTORIC STRUCTURES**

### **METHODOLOGY**

A historic structure is defined by the NPS as “a constructed work, usually immovable by nature or design, consciously created to serve some act” (DO 28). In order for a structure or building to be listed on or eligible for listing on the National Register, it must possess historic integrity of those features necessary to convey its significance, particularly with respect to location, setting, design, feeling, association, workmanship, and materials. The National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (NPS 1990) provides a comprehensive discussion of these characteristics. For purposes of analyzing potential impacts to historic structures, the thresholds of change for the intensity of an impact are defined as follows:

- Negligible:** Impact is at the lowest levels of detection.
- Minor:** Alteration of a character-defining feature(s) would not diminish the overall integrity of the resource.
- Moderate:** Alteration of a character-defining feature(s) would diminish the overall integrity of the resource.
- Major:** Loss of a character-defining feature(s) would diminish the overall integrity of the resource.

### **IMPACTS OF ALTERNATIVE A: NO-ACTION**

#### **Impacts**

Under Alternative A, no improvements would be made to historic structures within or adjacent to the cemetery. The cemetery approach road, main drive, and walks would remain in their current condition, with nonhistoric surfacing materials and more recent additions that detract from their

historic appearance and intent. The poor condition of the cemetery wall (loose and deteriorated mortar and settling in some locations) would remain and likely further deteriorate as a result of the drainage issues near the wall. Unsympathetic additions at the lodge, especially the aluminum triple-track storm windows and nonhistoric paint scheme, would continue to diminish its historic appearance. The utility buildings and the rostrum also would continue to have nonhistoric paint schemes. The brick base of the rostrum could crumble and settle further, as no work to repair brick and repoint would be carried out.

Under Alternative A, all of the grave markers for known burials would continue to lie flush with the ground, resulting in these markers' noncontributing status to the cemetery's significance under Criterion C of the National Register. The situation would not be consistent with the NCA's policy that grave markers should be upright. Although the NPS would clean and re-incise the stones as funding and staff became available, clearly the majority of the grave markers would continue to exhibit a weathered and chipped condition.

The absence of small-scale elements, including the three missing gun monuments, benches, and signs, and the presence of more recent signs, also would impact the setting for the elements still in place, primarily the single gun monument and the flagstaff, and those adjacent to them. The retention of the shortened flagstaff also impacts the historic integrity of this pivotal feature and its prominence in the cemetery.

Alternative A would maintain the historic structures in their existing conditions (nonhistoric appearances, nonhistoric elements, and poor condition of the cemetery wall due to loose mortar and settling). The cemetery would remain eligible for listing on the National Register; therefore, Alternative A would result in a minor, long-term, adverse impact on historic structures.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on historic structures at the cemetery. These projects include previous management of the cemetery, previous and future developments in the vicinity of the cemetery, and implementation of the Petersburg NB GMP. Previous management of the cemetery has included the cutting of grave markers, removal of small-scale features, and changes to and/or deterioration of historic structures. These changes diminished the dignified atmosphere and historic integrity this is appropriate for the cemetery. The changes also were not consistent with NCA policies. Past development has created visual intrusions at the cemetery. These intrusions have detracted from the setting of the historic resources in the cemetery. Future development could create additional intrusions, diminishing the integrity of these resources. Implementation of the GMP, however, would seek to further protect the historic structures at the cemetery and throughout Petersburg NB. These improvements would include enhancing educational and interpretive programs to explain the significance of the resources to visitors. It also would include updating and enhancing resource protection efforts. These projects, along with Alternative A, would have a moderate, long-term, adverse cumulative impact on historic structures. Alternative A would contribute a noticeable adverse increment to this cumulative impact.

## **IMPACTS OF ALTERNATIVE B: REHABILITATION (NPS PREFERRED)**

### **Impacts**

Under Alternative B (NPS Preferred Alternative), the historic structures within the cemetery would be greatly improved in appearance and condition. Resurfacing of the cemetery approach road and parking lot with a historic asphalt surface would restore the thoroughfare to its early 20th century condition. Repair to drainages in the wall, along with the cleaning and repointing of the wall, would aid in the wall's stability and long-term condition. The wall would continue to lack its historic ivy covering, but this would be done to protect the resource.

The restoration of the circular loop around the flagstaff, resurfacing of the main drive within the cemetery, the removal of the nonhistoric path on the east side of the lodge that leads to the restroom, and the narrowing of the service drive to retain a magnolia tree would further contribute to the rehabilitation of the condition of these structures circa 1933. A new universally accessible walkway on the west side of the lodge would return a historically accurate walkway to the cemetery. The planting of new trees and shrubs within the cemetery and the possible installation of a boxwood hedge in the shape of a Maltese cross are other proposed measures that would further contribute to the settings of the historic structures.

Installation of new upright grave markers would provide a profound improvement to the historic appearance of the grave markers. While disposition of the existing grave markers would need to be determined, this decision would be made in consultation with the SHPO, NCA, and other interested parties. Prior to any action, the existing grave markers would be documented as part of Petersburg NB's collections.

Various small-scale elements, now missing, would be installed, restoring important contributors to the cemetery's setting. These elements include a historically accurate flagstaff in the center of the cemetery, which would be visible again from Vaughan Road and the cemetery approach road. The three missing gun monuments previously located next to the flagstaff, but removed in the 1970s, would be reinstalled or re-created. Benches missing since the 1970s would be reinstalled and designed to be similar to the 1870s benches.

The 1933 paint schemes, which followed the National Cemetery Regulations from 1931, would be used in the proposed rehabilitation of the historic buildings. This improvement, along with removals of more recent elements on the lodge, would substantially enhance their historic appearance.

Alternative B would result in a long-term, beneficial impact on historic structures, as it proposes the rehabilitation of contributing features within the cemetery.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on historic structures at the cemetery. These projects are described under Alternative A and include previous management of the cemetery, previous and future developments in the vicinity of the cemetery, and implementation of the Petersburg NB GMP. These projects,

along with Alternative B, would have a long-term, beneficial cumulative impact on historic structures. Alternative B would contribute an appreciable beneficial increment to this cumulative impact.

## **CONCLUSIONS AND FINDINGS ON IMPAIRMENT FOR HISTORIC STRUCTURES**

Alternative A would maintain the historic structures in their existing conditions (nonhistoric appearances, nonhistoric elements, and poor condition of the cemetery wall due to loose mortar and settling). The cemetery would remain eligible for listing on the National Register; therefore, Alternative A would result in a minor, long-term, adverse impact on historic structures. Alternative A would contribute a noticeable adverse increment to a moderate, long-term, adverse cumulative impact. Implementing Alternative A would not result in an impairment of historic structures, as these features would remain under park care, even though they may not be presented as originally intended, and their eligibility would remain intact.

Alternative B would result in a long-term, beneficial impact on historic structures, as it proposes the rehabilitation of contributing features within the cemetery. Alternative B would contribute an appreciable beneficial increment to a long-term, beneficial cumulative impact. Alternative B would not result in an impairment of historic structures because these features would be rehabilitated and presented in their historic setting.

## **ARCHEOLOGICAL RESOURCES**

### **METHODOLOGY**

Archeological resources are the remains of past human activity and records documenting the scientific analysis of the remains (NPS DO 28: Cultural Resource Management Guideline). For purposes of analyzing potential impacts to archeological resources, the thresholds of change for the intensity of an impact are defined as follows:

**Negligible:** Impact is at the lowest levels of detection.

**Minor:** Disturbance of a site(s) results in little, if any, loss of integrity.

**Moderate:** Disturbance of a site(s) results in loss of integrity.

**Major:** Disturbance of a site(s) results in loss of integrity.



## **IMPACTS OF ALTERNATIVE A: NO-ACTION**

### **Impacts**

Under Alternative A, none of the proposed improvements would be made to the cemetery. Tree roots, currently causing upheaval of some of the grave markers and possibly some of the graves, would continue to threaten these resources.

The drainages along the cemetery wall would continue to be ineffective, resulting in standing water over a number of the graves. Over time, this condition could threaten the graves.

Due to these conditions, Alternative A would result in a minor, long-term, adverse impact on archeological resources.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on archeological resources at the cemetery. These projects include previous and future developments in the vicinity of the cemetery and implementation of the Petersburg NB GMP. Past development around the cemetery has most likely disturbed archeological resources that have some connection to the history of the cemetery. While these disturbances do not directly impact the known and unknown archeological resources within the cemetery grounds, they do result in the loss of further understanding of how these resources were associated with the surrounding environment. Future development could create additional intrusions, diminishing the integrity of these resources. Implementation of the GMP, however, would seek to further protect the archeological resources at the cemetery and throughout Petersburg NB. These improvements would include enhancing educational and interpretive programs to explain the significance of the resources to visitors. It also would include updating and enhancing resource protection efforts. These projects, along with Alternative A, would have a minor, long-term, adverse cumulative impact on archeological resources. Alternative A would contribute a noticeable adverse increment to this cumulative impact.

## **IMPACTS OF ALTERNATIVE B: REHABILITATION (NPS PREFERRED)**

### **Impacts**

Under Alternative B (NPS Preferred Alternative), drainage problems would be improved. This would reduce the threat of standing water over the graves and other resources.

The potential moving of the cemetery parking lot and installation of the septic field would require archeological investigations to ensure that no archaeological resources would be affected. Much of the area has not been formally investigated for archeological resources. Prior to construction activities, a program for the identification and evaluation of archeological resources would be conducted. During construction, known archeological resources would be avoided to the greatest extent possible. If archeological resources could not be avoided during construction, the excavation, recordation, and mapping of any substantial cultural remains would be completed

prior to construction, to ensure that important archeological data that otherwise would be lost is recovered and documented.

In-place preservation of important archeological resources is the goal of the NPS. Guided by the 2007 archeology survey (A.D. Marble 2008), which indicates relationships of grave markers to interred remains, installation of new upright grave markers would be carefully planned and conducted to minimize, to the extent possible, impacts to buried remains. Despite care and NPS intention to avoid any impacts to buried remains, there could be some disturbance to burials during the placement of the new headstones. The NPS is consulting with the Virginia SHPO and other interested parties to develop a programmatic agreement stipulating measures the NPS would take to ensure the protection of archeological resources at the cemetery. An archeological monitor would be on-site to observe the grave marker installation and, in the event any disturbance occurs, would initiate protocols stipulated in the programmatic agreement. A copy of the programmatic agreement is included in Appendix A.

During construction, Alternative B would result in minor to moderate, short-term, adverse impacts, while tree removal, improving the drainage system, and minimizing standing water would result in long-term, beneficial impacts on archeological resources.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on archeological resources at the cemetery. These projects include previous and future developments in the vicinity of the cemetery and implementation of the Petersburg NB GMP, as described under Alternative A. These projects along with Alternative B would have long-term, beneficial and minor, long-term, adverse cumulative impacts on archeological resources. Alternative B would contribute a noticeable beneficial increment to this cumulative impact.

### **CONCLUSIONS AND FINDINGS ON IMPAIRMENT FOR ARCHEOLOGICAL RESOURCES**

Due to tree roots, existing drainage issues, and problems with standing water, Alternative A would result in a minor, long-term, adverse impact on archeological resources. Alternative A would contribute a noticeable adverse increment to a minor, long-term, adverse cumulative impact. Implementing Alternative A would not result in impairment, as park staff would continue to monitor and protect the grave sites from further damage as funding became available.

During construction, Alternative B would result in minor to moderate, short-term, adverse impacts, while improving the drainage system and minimizing standing water would result in long-term, beneficial impacts on archeological resources. Alternative B would contribute a noticeable increment to long-term, beneficial and minor, long-term, adverse cumulative impacts. Implementing Alternative B would not result in impairment because care would be taken to improve the conditions within the gravesites and minimize impacts to remains during construction.

## **VISITOR USE AND EXPERIENCE**

### **METHODOLOGY**

NPS *Management Policies 2006* (NPS 2006) states that enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks and that the NPS is committed to providing appropriate, high-quality opportunities for visitors to enjoy parks. Past interpretive and administrative planning documents provided background on changes to visitor use and experience over time. Anticipated impacts on visitor use and experience were analyzed using information from previous studies. For this analysis, visitor use and experience includes visitor understanding and satisfaction, site access and circulation, visual quality, and ethnographic resources are included in this topic. The means by which the visitor experiences the resource relates to the quality of the ethnographic resources. Based on these findings, the following intensity levels were developed:

- Negligible:** Changes in visitor use and/or experience would be below or at the level of detection. The visitor would not likely be aware of the impacts associated with the alternative.
- Minor:** Changes in visitor use and/or experience would be detectable, although the changes would be slight. The visitor would be slightly aware of the impacts associated with the alternative.
- Moderate:** Changes in visitor use and/or experience would be readily apparent. The visitor would be aware of the impacts associated with the alternative and would likely be able to express an opinion about the changes.
- Major:** Changes in visitor use and/or experience would be readily apparent and would be severely adverse or exceptionally beneficial. The visitor would be aware of the impacts associated with the alternative and would likely express a strong opinion about the changes.

### **IMPACTS OF ALTERNATIVE A: NO-ACTION**

#### **Impacts**

Under Alternative A, there would be no change to the visitor experience at the cemetery. Flanked with private mailboxes, the cemetery approach road would continue to blend in with the surrounding landscape and be unremarkable to visitors approaching the cemetery. The cemetery approach road would continue to serve as an access route to Vaughan Road for a private driveway. The cemetery approach road also would continue to be maintained with historically inaccurate materials. Under this alternative, the cemetery approach road would remain lined with a mix of forest types, failing to create a setting that was historically accurate or provide the appropriate level of respect required of a national cemetery. Because of these conditions, visitors would fail to understand the full importance of the cemetery and may be confused when approaching the site.

The parking lot would continue to be the first landmark apparent to visitors. This location would continue to disrupt views of the cemetery, minimizing the cemetery's importance and visitor understanding. Like the approach road, the parking lot would continue to be maintained with historically inaccurate materials.

The cemetery wall would continue to be maintained as staff and funding were available. The drainages within the wall would remain clogged and inefficient, which would result in flooding in some areas within the wall, preventing visitors from accessing select grave sites and detracting from the dignity of the cemetery.

Within the cemetery, the maintenance building would remain unscreened from the cemetery, impacting the visitor's visual experience. The lodge would continue to provide limited visitor contact opportunities. Both buildings would fail to reflect their historic appearance due to modern improvements and paint schemes. The rostrum and restroom building also would appear with a more modern appearance than originally intended. This would lead visitors to believe that these structures were modern developments constructed to facilitate NPS operation. The lack of understanding and respect for these structures would detract from the overall experience of the history of the cemetery.

Under Alternative A, no changes would be made to the main drive. The walkway would remain ridged and pitted with an uneven edge along the cemetery lawn, leading to potential tripping hazards for visitors. The main drive would continue to form a teardrop loop around the flagstaff at the center of the cemetery. This is not the intended circulation pattern for the cemetery and would keep visitors from appreciating the designed landscape.

The flagstaff and surrounding monuments and signs also would not reflect the intended design of the cemetery. Not only would this prevent visitors from appreciating the history of the cemetery but also would require visitors to walk through the cemetery before finding an opportunity to locate a specific grave. Under Alternative A, no benches would be added to the cemetery. This would prevent visitors from resting or pausing to reflect on the history of the cemetery.

Finally, under Alternative A, no changes would be made to the grave markers. The stones would continue to lay flush with the ground. The grave markers would continue to decay, making them more difficult to recognize or read. This would hinder visitors' ability to identify a specific grave. It also would fail to provide the appropriate respect granted to a national cemetery or an appropriate understanding of the number of lives that were lost in the battles associated with the cemetery.

Overall, Alternative A would result in a moderate, long-term, adverse impact on visitor use and experience, as no changes would be made to the existing visitor experience which includes limited amenities, understanding of the site, and minimal interpretation.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on the visitor use and experience at the cemetery. These projects include

previous management of the cemetery, previous and future developments in the vicinity of the cemetery and implementation of the Petersburg NB GMP. Previous management of the cemetery has prevented visitors from understanding the designed landscape of the site or the number of interments included within its walls. Past development around the cemetery has created improved road networks, neighborhoods, restaurants, and other visitor services. These developments, however, also have impacted the resources at the cemetery. Viewsheds into and within the cemetery have been disrupted by modern development and noises from the surrounding roads impede on the atmosphere within the cemetery. Future developments in the region could magnify these impacts. The Petersburg NB GMP was developed, in part, to address these conditions. The implementation of the GMP includes plans for acquiring additional lands, enhancing the protection of existing resources, and developing interpretive and educational programs that are not distracted by these developments. These projects, along with Alternative A, would have a minor to moderate, long-term, adverse cumulative impact on visitor use and experience. Alternative A would contribute an appreciable adverse increment to this cumulative impact.

## **IMPACTS OF ALTERNATIVE B: REHABILITATION (NPS PREFERRED)**

### **Impacts**

Under Alternative B (NPS Preferred Alternative), visitors would have a chance to experience a more culturally and historically accurate landscape in a more contemplative atmosphere. This experience would begin at the entrance to the cemetery. The relocation of the private mailboxes and driveway would allow visitors to recognize they were on NPS property as soon as they turned off Vaughan Road. The selective clearing of trees along the cemetery approach road would allow a historically accurate allée of trees to be planted. This planting, along with the use of historically accurate materials to pave the approach road, would provide the appropriate appearance and condition visitors expect of a unit of the national park system and a national cemetery.

The NPS would develop plans to acquire land adjacent to the cemetery. This would provide space for the parking lot to be moved out of the line of sight from the approach road to the cemetery gates. Opening this viewshed would allow visitors to immediately recognize the cemetery and view the landscape as it was originally designed.

The cemetery wall would be improved to repair damage caused by weathering and water damage. The wall would not include the ivy that historically grew on it, as the ivy enhanced conditions that threatened the structural integrity of the wall. The wall would provide a clean and respectful setting surrounding the cemetery. These improvements also would include addressing the drainages in the walls. Improvements to the drainages would prevent flooding within portions of the cemetery. This would allow visitors to access any grave at any time. It also would avoid detracting from a solemn and respectful atmosphere within the cemetery.

Within the cemetery walls, the maintenance building would be screened with vegetation. This would prevent the building from intruding on the cemetery landscape. The lodge, restrooms, and

rostrum would all be painted with colors that matched their historic appearance. Other structural improvements to these buildings would allow visitors to recognize them as a historic part of the cemetery. Within the lodge, improved visitor contact services would be provided. Visitors would be able to gain an understanding of the history of the cemetery before walking through it.

Throughout the cemetery, the main drive and other walkways would receive attention to provide historically accurate routes through the cemetery. This includes restoring the circular loop around the flagstaff. The flagstaff would be restored to its historically accurate height, allowing it to be seen from the road and throughout the cemetery. The cannon monument would be supplemented with three similar monuments, creating a uniform appearance that is consistent with the intended design of the cemetery. At the flagstaff, improved signs would build upon the enhanced orientation provided at the lodge. The improved signs also would enhance visitors' ability to locate specific graves. Benches would be installed at appropriate locations throughout the cemetery to match those that had existed during the early years of the cemetery. These improvements would not only enhance visitor movement through the cemetery but return the grounds to their intended and respected appearance.

Finally, by installing new, upright grave markers, Alternative B would greatly enhance the atmosphere and experience at the cemetery. Each grave would be recognizable by the new stone. These stones would provide a uniform look across the cemetery, one that also is consistent with other national cemeteries. The upright grave markers would provide visitors with an understanding of the number of graves at the site and the magnitude of the lives lost during the Civil War.

Alternative B would result in a minor, short-term, adverse impact on visitor use and experience during the construction process and as people adjusted to the relocated parking lot. Once construction was complete, Alternative B would result in a long-term, beneficial impact on visitor use and experience, as visitors would notice the improved visitor amenities, have a better understanding of the cemetery and its significance, and could enjoy more interpretive opportunities at the lodge and throughout the site.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on visitor use and experience at the cemetery. These projects are described under Alternative A and include previous management of the cemetery, previous and future developments in the vicinity of the cemetery and implementation of the Petersburg NB GMP. These projects, along with Alternative B, would have a long-term, beneficial cumulative impact on visitor use and experience. Alternative B would contribute an appreciable beneficial increment to this cumulative impact.

### **CONCLUSIONS FOR VISITOR USE AND EXPERIENCE**

Overall, Alternative A would result in a moderate, long-term, adverse impact on visitor use and experience, as no changes would be made to the existing visitor experience which includes limited amenities, understanding of the site, and minimal interpretation. Alternative A would

contribute an appreciable adverse increment to a minor to moderate, long-term, adverse cumulative impact.

Alternative B would result in a minor, short-term, adverse impact on visitor use and experience during the construction process and as people adjusted to the relocated parking lot. Once construction was complete, Alternative B would result in a long-term, beneficial impact on visitor use and experience, as visitors would notice the improved visitor amenities, have a better understanding of the cemetery and its significance, and could enjoy more interpretive opportunities at the lodge and throughout the site. Alternative B would contribute an appreciable beneficial increment to the long-term, beneficial cumulative impact.

## **OPERATIONS AND INFRASTRUCTURE**

### **METHODOLOGY**

Operations, for the purpose of this analysis, refer to the quality of effectiveness of the infrastructure and the ability to maintain the infrastructure used in the operation of the park in order to adequately protect and preserve vital resources and provide for an enhanced visitor experience. This includes an analysis of the condition and usefulness of the facilities and developed features used to support the operations of the park. The thresholds of change for the intensity of this impact are defined as follows:

- Negligible:** Operations and infrastructure would not be affected, or the impacts would be at low levels of detection and would not have an appreciable impact on operations and infrastructure.
- Minor:** The impact would be detectable but would be of a magnitude that would not have an appreciable impact on operations and infrastructure.
- Moderate:** The impacts would be readily apparent and would result in a substantial change in operations and infrastructure in a manner noticeable to staff and the public.
- Major:** The impacts would be readily apparent, would result in a substantial change in park operations in a manner noticeable to staff and the public, and be markedly different from existing operations and infrastructure.

### **IMPACTS OF ALTERNATIVE A: NO-ACTION**

#### **Impacts**

Under Alternative A, there would be no changes made to the operations and infrastructure at the cemetery. The entrance to the cemetery would continue to be shared with adjacent private residences. The cemetery approach road would remain in poor physical condition with historically inaccurate pavement. The approach road is lined with a mix of forest types that are not historically accurate nor do they meet the standards of a national cemetery.

The cemetery parking lot would continue to sit between the approach road and the cemetery gates. Like the approach road, it would remain in poor condition with historically inaccurate paving materials. Similarly, the cemetery wall would remain in poor condition. Water damage and weathering would continue to threaten its structural integrity. The drainages within the wall would remain clogged and would not allow for efficient passage of stormwater. The flooding that would result from the lack of drainage would become a growing threat for the grounds that were submerged following storm events. The wall, as well as the approach road and parking lot, would be repaired when funding and staff became available.

Within the cemetery, the lodge would continue to be opened on a seasonal basis. The lodge, maintenance building, restrooms, and rostrum would all be maintained with modern paints and materials. Lack of staff and funding would prevent the NPS from repairing structural problems at these buildings. In addition, the maintenance building would remain visible on the cemetery landscape. The path to the restrooms would remain on the eastern side of the lodge, which is not universally accessible. There would be no interpretive or educational material available at the entrance to the cemetery.

Throughout the cemetery, the main drive would continue to form an uneven border with the cemetery lawn and follow an inaccurate teardrop loop around the flagstaff. The flagstaff itself would not be at a historically accurate height. The cannon memorial would continue to be the only memorial at the center of the cemetery and the grave register would remain unchanged. No benches or other furniture would be installed in the cemetery.

Under Alternative A, no changes would be made to the grave markers. They would continue to lie flush with the ground and be damaged by weathering and maintenance equipment. This condition, however, would allow mowing to be completed with ease. When staff and funding became available, the NPS would re-incise and clean the existing grave markers.

As existing infrastructure continues to deteriorate, Alternative A would have a minor, long-term, adverse impact on operations and infrastructure.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on operations and infrastructure at the cemetery. These projects include the previous management of the cemetery and the implementation of the Petersburg NB GMP. Previous management of the cemetery has included the cutting of grave markers, removal of small-scale features, and changes to and/or deterioration of historic structures. These changes diminished the dignified atmosphere and historic integrity that is appropriate for the cemetery. The changes also were not consistent with NCA policies. The Petersburg NB GMP calls for changes in staffing, programming, and park structures. During implementation, these changes may require additional staff time and funding. Once implementation of different projects was complete, however, the park staff would be better equipped to carry out the mission of Petersburg NB, and the park would be better suited to meet visitor needs. These projects, along with Alternative A, would have a moderate, long-term, adverse cumulative impact on operations



and infrastructure at the cemetery. Alternative A would contribute a noticeable adverse increment to this cumulative impact.

## **IMPACTS OF ALTERNATIVE B: REHABILITATION (NPS PREFERRED)**

### **Impacts**

Under Alternative B (NPS Preferred Alternative), the cemetery entrance would be improved by relocating the connection to the private driveway. The cemetery approach road would be repaved with historically accurate materials and lined with new plants that would form an allée of trees along its length.

Under this alternative, the parking lot would be relocated when land became available. The new parking lot would be the same size and offer the same number of parking spaces as the existing lot. The new parking lot, however, would be paved with historically accurate materials. The footprint of the old parking lot would be replanted with grasses and shrubs that were consistent with the original design of the cemetery.

The cemetery wall would be improved by replacing old bricks, re-pointing, surface cleaning, repairing joints, waterproofing, and correction of previous treatments that do not meet Secretary of the Interior's Standards for the Treatment of Historic Properties. Ruts around the drainages in the wall would be filled and the drainages would be cleaned to allow for stormwater to flow out of the cemetery.

Within the cemetery, the lodge would be reconfigured to provide regular visitor contact. Operations would be modified to possibly provide additional visitor contact staffing. The lodge, along with the maintenance building, restrooms, and rostrum, would be repainted with historically accurate paint schemes and many of the modern additions would be removed. The path to the restrooms would be replaced with a historically accurate and universally accessible walkway to the west of the lodge. The historic iron welcome tablet, a new interpretive sign, and the burial register would be relocated to or near the lodge for ease of access to visitors. The maintenance drive would be realigned and screened with a new hedge. A new septic field would be installed outside the cemetery wall to service these buildings.

Along the main drive, new benches would be strategically located. The edge of the main drive would be formalized and it would be returned to its historic loop around the flagstaff. A new flagstaff would be installed at the center of the cemetery to match its historic height. At the flagstaff, new signs would be installed to correspond with the improved burial register. Additional cannon monuments would be installed to accompany the existing monument to re-create a historically accurate setting.

New grave markers would be installed throughout the cemetery. The markers would be upright stone blocks that would meet the NPS and NCA standards. The existing grave markers would remain flush to the ground until the NPS determined the appropriate course of action for dealing with them.

Most of the improvements made at the cemetery would allow regular maintenance to maintain the improved standards. Additional maintenance time, however, would be required to maintain the cemetery lawn around the upright grave markers.

Alternative B would result in a minor, short-term, adverse impact, as staff developed new work plans for maintaining the cemetery. Alternative B also would result in a long-term, beneficial impact on operations and infrastructure as improvements to park infrastructure were completed and once park staff became accustomed to the new work plan.

### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on operations and infrastructure at the cemetery. These projects are described under Alternative A and include previous management of the cemetery and the implementation of the Petersburg NB GMP. These projects, along with Alternative B, would have a long-term, beneficial cumulative impact on operations and infrastructure. Alternative B would contribute an appreciable beneficial increment to this cumulative impact.

### **CONCLUSIONS FOR OPERATIONS AND INFRASTRUCTURE**

As existing infrastructure continues to deteriorate, Alternative A would have a minor, long-term, adverse impact on operations and infrastructure. Alternative A would contribute a noticeable adverse increment to a moderate, long-term, adverse cumulative impact at the cemetery.

Alternative B would result in a minor, short-term, adverse impact, as staff developed new work plans for maintaining the cemetery. Alternative B also would result in a long-term, beneficial impact on operations and infrastructure once park staff became accustomed to the new work plan and improvements to park infrastructure were completed. Alternative B would contribute an appreciable beneficial increment to a moderate, long-term, beneficial cumulative impact.

## **SUMMARY OF ENVIRONMENTAL CONSEQUENCES**

In “Chapter 2: Alternatives,” Table 2 provides a summary of the environmental consequences related to each alternative. A more detailed explanation of the impacts is presented in “Chapter 4: Environmental Consequences.” A summary of the impacts related to each alternative is presented below.

### **ALTERNATIVE A: NO ACTION**

No changes would be made to the condition of the resources within the cemetery. Intrusions on the cultural landscape from outside of the cemetery walls would remain. The current condition of the historic structures and other infrastructure in the cemetery would be maintained, resulting in a limited visitor experience and failing or historically inaccurate infrastructure. The analysis of potential impacts of Alternative A did not identify any major adverse impacts on cultural landscapes, historic structures, archeological resources, visitor use and experience, or operations and

infrastructure; therefore, implementation of Alternative A is not likely to result in impairment of any park resource or value.

### **ALTERNATIVE B: REHABILITATION (NPS PREFERRED)**

Improvements to resources inside and outside the cemetery walls would rehabilitate the cultural landscape. New grave markers would be installed and structures would be returned to their historic era appearance. Intrusions on the rehabilitated landscape would be screened as much as possible. Historic structures and other infrastructure would be rehabilitated to reflect the cemetery's designed appearance. Visitor understanding and satisfaction would be improved. Operations and infrastructure would be modified to provide additional visitors services, while maintenance of the cemetery lawn would require more staff time. The analysis of potential impacts of Alternative B did not identify any major, adverse impacts on cultural landscapes, historic structures, archeological resources, visitor use and experience, and operations and infrastructure, therefore, implementation of Alternative B is not likely to result in impairment of any park resource or value.

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## CONSULTATION AND COORDINATION

NPS DO 12 requires the NPS to make “diligent” efforts to involve the interested and affected public in the NEPA process. This process, known as scoping, helps to determine the important issues and eliminate those that are not; allocate assignments among the interdisciplinary team members and/or other participating agencies; identify related projects and associated documents; identify other permits, surveys, consultations, etc. required by other agencies; and create a schedule that allows adequate time to prepare and distribute the environmental document for public review and comment before a final decision is made. This chapter documents the scoping process for the proposed action, identifies future compliance needs and permits, and includes the official list of recipients for the document.

### THE SCOPING PROCESS

The scoping process for this project was initiated as part of Petersburg NB’s 2004 GMP. During the development of the GMP, the NPS conducted extensive agency and public scoping to introduce the proposed management objectives and goals at the park. This included an introduction to future plans at the cemetery. The GMP was followed by the CLR in 2007 which included additional public scoping focused on plans for the cemetery. Finally, in October 2008, the NPS held public meetings to solicit input on the alternatives outlined in this document. The NPS also solicited official agency comment on these plans. The input received throughout this process was used to develop the alternatives presented in this EA and to further inform the scoping process described below.

### INTERNAL SCOPING

Internal scoping for the proposed action was initiated during the development of the GMP. Park staff met with other NPS personnel to develop goals and management objectives for the park over the next 15-20 years. This included goals for improving the cemetery. These goals were advanced during internal scoping as the CLR was developed and further refined as a part of this planning process. During the development of this EA, NPS personnel met to review the goals and objectives outlined in the GMP for the cemetery, review the concepts developed through the CLR process, and identify the alternatives that would be carried through the EA for complete analysis. The planning team has continued to communicate throughout the development of this document.

## **PUBLIC SCOPING**

The public was first asked to participate in the planning process for this EA on September 28, 2007. At this time, the NPS introduced the proposed cemetery rehabilitation to the public and solicited initial input on the proposed plan. In October 2008 two additional public meetings were held. During the meetings, NPS staff made a presentation about the history of the cemetery, how the existing conditions at the cemetery had developed, and the goal of NPS rehabilitation efforts. The NPS extended the public comment period on the proposed improvements for several weeks following these meetings to provide the public with an opportunity to participate in the process. Members of the public were receptive to the NPS desires to rehabilitate the cemetery but varied in their opinions on what should be done. The NPS reviewed the comments that were received and took them into consideration during the planning of the proposed action.

## **AGENCY SCOPING**

Agencies contacted via letter during the planning process included the U.S. Fish and Wildlife Service, the Advisory Council on Historic Preservation, the Virginia Department of Game and Inland Fisheries, the Virginia Department of Conservation and Recreation, and the SHPO. The Virginia Department of Conservation and Recreation responded in a letter dated October 24, 2008. In the letter the agency stated that there were no known resources within the project area under its jurisdiction, which includes special status species and natural heritage areas. Other agencies contacted responded informally that they would provide official comment during the review of this document.

The NPS has continued agency scoping with the SHPO throughout this process to come to an agreement on the appropriate course of action for dealing with the existing grave markers.

## **TRIBAL COORDINATION**

In September 2007 and September 2008, the NPS contacted the Virginia Council on Indians to inform them of the project and subsequent public meetings regarding the rehabilitation and management of Poplar Grove National Cemetery (see Appendix B). Representatives did not attend the meeting and no formal response was received. The Virginia Council on Indians, the Catawba Indian Nation, and the Chippewa Indians will receive a copy of the EA for review and comment.

## **FUTURE COMPLIANCE NEEDS/PERMITS**

Prior to the initiation of the proposed action, the NPS and the SHPO would execute the Programmatic Agreement on how to address the proposed action. At the project onset, the park and the SHPO determined that a Programmatic Agreement would best meet compliance with section 106 of the National Historic Preservation Act. A draft Programmatic Agreement is provided in Appendix A. Comments on the Programmatic Agreement are being accepted through the review of this EA. The executed agreement will be provided with the Finding of No Significant Impact for this proposed action.

In addition, if and when land was acquired to relocate the parking lot, the NPS would obtain appropriate land disturbance permits and abide by local and state erosion and sediment control standards. The relocation of the septic field would require review and approval by the Virginia Department of Health. No other permits or approvals would be required.

## **DOCUMENT REVIEW**

The EA will be on formal public and agency review for 30 days and has been distributed to a variety of interested individuals, agencies, and organizations. It is also available on the Internet at <<http://parkplanning.nps.gov>>, and hard copies are available at the Petersburg NB Visitor Center and local libraries.

## **LIST OF PREPARERS AND CONTRIBUTORS**

This document was prepared by Vanasse Hangen Brustlin, Inc. with input from staff at Petersburg NB, the NPS Northeast Region Office, and the NPS Denver Service Center.

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# REFERENCES

## BIBLIOGRAPHY

A.D. Marble & Company

2008 *Phase I Archeological Survey: Rehabilitate Poplar Grove National Cemetery Project.*

Environmental Protection Agency

2008 *U.S. Environmental Protection Agency Green Book.* Available on the Internet at  
<<http://www.epa.gov/air/oaqps/greenbk/index.html>>. Accessed on 9/24/2008.

Intergovernmental Panel on Climate Change (IPCC)

2007a *Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change.* M. L. Parry, O. F. Canziani, J. P. Palutikof, P. J. van der Linden, and C. E. Hanson (eds.). Cambridge, UK: Cambridge University Press.

2007b *Climate Change 2007: Mitigation of Climate Change. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change.* B. Metz, O. R. Davidson, P. R. Bosch, R. Dave, and L. A. Meyer (eds.). Cambridge, United Kingdom and New York, NY, USA: Cambridge University Press.

2007c *Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change.* S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K. B. Averyt, M. Tignor, and H. L. Miller (eds.). Cambridge, United Kingdom and New York, NY, USA: Cambridge University Press

2007d *Climate Change 2007: Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change.* Core Writing Team, R. K. Pachauri and A. Reisinger (eds.). Geneva, Switzerland: IPCC.

National Park Service (NPS)

1990 *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation.*

2004 *Petersburg National Battlefield Final General Management Plan/Abbreviated Final Environmental Impact Statement.*

2006 *Management Policies 2006.*

The Olmsted Center for Landscape Preservation. (Olmsted Center)

2009 *Cultural Landscape Report for Poplar Grove National Cemetery.*

Natural Resource Conservation Service (NRCS)

2008 *Soil Survey*. Available on the Internet at < <http://soildatamart.nrcs.usda.gov>>. Accessed on 9/15/2008.

U.S. Department of Veterans Affairs, National Cemetery Administration (NCA)

2002 *Volume 3: Cemetery Standards of Appearance*. March 28, 2002.

# **APPENDIX A: DRAFT PROGRAMMATIC AGREEMENT WITH VIRGINIA SHPO**



**PROGRAMMATIC AGREEMENT  
AMONG  
THE NATIONAL PARK SERVICE**

**AND THE  
VIRGINIA STATE HISTORIC PRESERVATION OFFICE  
REGARDING IMPLEMENTATION OF A PROGRAM FOR THE  
REHABILITATION OF POPLAR GROVE NATIONAL CEMETERY  
AND CONTINUING PRESERVATION MAINTENANCE OF  
POPLAR GROVE NATIONAL CEMETERY**

**WHEREAS**, the United States Department of the Interior, National Park Service, Petersburg National Battlefield (NPS) has stewardship responsibilities for Poplar Grove National Cemetery (CEMETERY); and;

**WHEREAS**, the CEMETERY is listed in the National Register of Historic Places as part of Petersburg National Battlefield; and;

**WHEREAS**, NPS proposes to rehabilitate the CEMETERY and the concept for the rehabilitation of the CEMETERY is outlined in the Petersburg National Battlefield 2004 *General Management Plan* (GMP) and in a cultural landscape report (CLR), both of which underwent public review; and;

**WHEREAS**, the rehabilitation will include actions such as replacing the existing cemetery stones with new upright stones, rehabilitating cemetery structures for park use, upgrading visitor services such as restrooms, parking, and interpretive information, rehabilitating the landscape, and repairing CEMETERY features; and;

**WHEREAS**, the NPS has determined that the rehabilitation of the CEMETERY (UNDERTAKING), is a complex undertaking that may be completed in stages and has the potential to adversely affect historic properties, as defined at 36 CFR §800.16(1)(1); and;

**WHEREAS**, the NPS has determined that the program of routine and preservation maintenance within the CEMETERY (WORK) may affect characteristics of the property that may qualify it for inclusion in the National Register of Historic Places; and has consulted with the Advisory Council on Historic Preservation (Council) and the Virginia State Historic Preservation Officer (SHPO) pursuant to Section 800.13 of the regulations (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act as amended (NHPA; 16 U.S.C. 470f) and Section 110 of the same Act (16 USC 470h-2); and;

**WHEREAS**, the NPS consulted with the Virginia State Historic Preservation Officer (SHPO) pursuant to the 14 November 2008 Programmatic Agreement among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers (Nationwide PA) and 36 CFR Part 800, the regulation that implements Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended; and;

**WHEREAS**, in order to fully realize the goals of the Nationwide PA and to streamline the Section 106 review process for WORK that will not adversely affect characteristics of the property that may qualify it for inclusion in the National Register of Historic Places, the NPS has identified additional undertakings to be added to the list of undertakings eligible for streamlined review; and;

**WHEREAS**, the NPS notified the Advisory Council on Historic Preservation (ACHP) of the potential adverse effect and the decision to develop a programmatic agreement pursuant to 36 CFR §800.6(a)(1)(i)(C) and, in turn, 36 CFR §800.14(b)(3); and;

**WHEREAS**, the ACHP declined to participate in consultations to develop a programmatic agreement (PA) to resolve potential adverse effects to historic properties during the implementation of the UNDERTAKING pursuant to 36 CFR §800.6(a)(1) (iii); and;

**WHEREAS**, the NPS has invited the Catawba Indian Nation to participate in consultation towards this PA and to concur in this agreement and the Catawba Indian Nation has [*response pending via end of comment period*]; and;

**WHEREAS**, the NPS has solicited and considered the views of the public by using the Planning, Environmental and Public Comment system in addition to a public meetings in October 2008; and;

**WHEREAS**, the NPS pursuant to 36 CFR § 800.8 has conducted a review process in accordance with the National Environmental Policy Act of 1969 (as amended), for the development of an Environmental Assessment (EA), and solicited public input on the review of potential effects the proposed Undertaking may have on historic properties in both the EA and this Agreement during that process;

**NOW, THEREFORE**, the NPS and SHPO agree that, upon the NPS's decision to proceed with the Undertaking, the NPS shall ensure that the UNDERTAKING is implemented in accordance with the following stipulations in order to take into account the effects of the UNDERTAKING on historic properties, and further agree that these stipulations shall govern the UNDERTAKING and all of its parts until this PA expires or is terminated.

## **STIPULATIONS**

### **I. PROGRAMMATIC AGREEMENT SCOPE**

- A. This PA covers all actions related to the rehabilitation of the CEMETERY and provides a streamlined process for WORK at the CEMETERY.
- B. NPS shall ensure that the CEMETERY rehabilitation is implemented in consultation with the SHPO, and that rehabilitation of the CEMETERY shall adhere to the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (36 CFR Part 68) and the approved CLR. The rehabilitation shall focus on the year 1933, or the end of the War Department era (1869 through 1933), and reflect the solemnity appropriate to a National Cemetery.

- C. The UNDERTAKING covered by this PA shall includes:
- a. Erecting new gravestones in CEMETERY's historic circular and linear patterns;
  - b. Erecting new block style markers for unknown soldiers;
  - c. Reestablishing selected missing CEMETERY features;
  - d. Removing features that are not historic and detract from the overall dignified effect of the CEMETERY, such as the current grave locator;
  - e. Enhancing the landscaping plan to reflect the overall feeling of plantings implemented by the War Department;
  - f. Rehabilitating the CEMETERY Lodge for use as a visitor contact station and other buildings for park and visitor use;
  - g. Correcting drainage problems;
  - h. Upgrading utilities and septic at the site;
  - i. Repairing the perimeter wall;
  - j. Rehabilitating the approach to the CEMETERY for visitor safety and to better reflect the historic design while sheltering the CEMETERY from modern intrusions;
  - k. Enhancing and moving existing parking;
  - l. Re-establishing historic circulation paths within the cemetery.
- 1. The work will be done in accordance with approved management plans including a CLR, and an environmental assessment.
  - 2. The work will be done through several different funding sources and may be done at different times as funding and park priorities allow.
- D. The streamlined process for ongoing maintenance at the CEMETERY is covered in stipulation X of this PA.

## **II. THE CONSULTATION PROCESS**

- A. The NPS shall submit designs and specifications to the SHPO for review and comment at the Design Development and Construction Document phases, as well as other submittals called for by this PA. The SHPO shall have 30 calendar days to review all submittals. Should the SHPO not respond within 30 calendar days, the NPS shall assume concurrence.
- B. In the event that minor modifications in design or materials are required during construction, such modifications would be allowed under this Programmatic Agreement provided that the changes are consistent with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (36 CFR Part 68) and are approved by the Park's CRM Advisor Team and the Superintendent. The NPS will document such minor modifications in an internal memo to the files that will be available at the Park for inspection by the SHPO.

## **III. INSTALLATION AND TREATMENT OF GRAVESTONES**

- A. The method of gravestone installation shall be determined in consultation with the SHPO. The method should be practicable, minimize disturbance to CEMETERY features and to human remains and compatible with the goals of the UNDERTAKING.
- B. Gravestone styles will represent the major styles currently found in the burial ground as far as can be practicably replicated by the U.S. Department of Veterans Affairs and will be of a style appropriate to the original burial.
- C. The information carved into the stones will replicate the information currently on the stones. Possible corrections and/or additions, if supported by new research or information and as deemed appropriate by NPS historians and the Superintendent, will be entered into an electronic database and made accessible to researchers and the public.
- D. New gravestones will be arranged to replicate the existing circular and linear layout which is a character defining element of the War Department era. Old stones will be photographed and the photographs placed in the electronic database mentioned above and the information made available to researchers and the public. Depending on public reaction to the EA, old stones will left in approximately in place and aligned with the new stones to create an ordered appearance, or be disposed of in a manner agreed to by the SHPO after the parties have taken into account the public comments to the EA.
- E. All existing gravestone and marker locations will be recorded using a handheld GPS device prior to construction and a map produced to show their location.
- F. If it is determined that the existing stones will remain in the CEMETERY, as few stones as practicable will be removed at one time, not to exceed one section, to facilitate construction. Stones will be replaced prior to any additional stones being removed.
- G. If the existing stones are reinstalled, stones and blocks will be cleaned first to remove soil and biological growth prior to being reinstalled in the CEMETERY, using protocol developed by the NPS. The protocol will be developed after testing to determine the most effective and gentlest cleaning method and will be approved by the SHPO prior to being implemented on a large scale.

#### **IV. LANDSCAPING**

- A. Landscaping for this UNDERTAKING will follow the recommendations of the approved CLR, with the goal of reestablishing the historic character of the trees and plantings, and to approximate the general character of the historic period as shown by Drawing 4.1 in the Cultural Landscape Report. Care will be taken to minimize intrusion into the graves or circular patterns. The SHPO will receive the final planting plan for comment prior to implementation.
- B. Trees and shrubs to be removed from historic walks, drives, grounds or grave sites due to age, disease or safety hazards will be treated in the following manner:
  - 1. Trees and shrubs, less than 8" diameter at the base, will be cut flush to the ground and treated with approved NPS herbicide within 2 hours of being cut.



2. Trees and shrubs more than 8" diameter at the base will be ground to a depth of 4" below ground level. Chips will be removed from the stump and the void filled with topsoil.
  3. Branches and debris will be removed in such a way as to prevent damage to graves, headstones or other CEMETERY features.
- C. Heavy equipment will only be allowed within the lawn area of the CEMETERY, including the turf pathways, when the ground conditions are dry or frozen or, alternatively, with the use of construction mats to prevent ruts and soil compaction.
- D. A qualified archeologist will monitor landscaping activities in accordance with stipulations VI of this PA and follow the procedures outlined in stipulations VII and VIII for unexpected discoveries.

**V. BUILDING REHABILITATION AND OTHER CONSTRUCTION ACTIVITIES**

- A. Parking lot placement, utility upgrades, building rehabilitation, cemetery wall treatments and the introduction of CEMETERY features such as benches and finding aids, and visitor facilities will be designed in consultation with the SHPO, be consistent with the CLR and other approved planning documents, and will meet the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (36 CFR Part 68) as discussed in stipulation II.

**VI. IDENTIFICATION, EVALUATION AND TREATMENT OF ARCHEOLOGICAL RESOURCES**

**A. Pre-construction Activities**

1. Whenever appropriate, NPS shall conduct archeological investigations of areas to be disturbed by the UNDERTAKING prior to construction, except for actual headstone replacement, as discussed in stipulation III of this PA. Such activities may include alley widening, parking lot construction, drainage work, facilities upgrades, grading, and landscaping.
2. The NPS shall develop an Archeological Investigation Plan for the identification of significant information from archeological resources eligible for listing in the National Register of Historic Places that could be affected by the UNDERTAKING. The archeological investigation plan shall address the following:
  - a. compilation of maps and other historic documents that may indicate locations of previous site features in the area of potential effects and a thorough review of previous archeological investigations of the area.
  - b. figure(s) delineating survey area(s).
  - c. survey procedures shall conform to the Secretary of the Interior's Standards and Guidelines for Archeology and Historic

Preservation (1983) and the National Park Service's DO-28, *Cultural Resource Management Guidelines* (1997).

- d. procedures for both the treatment of archeological resources (including the provision that all aspects of the project provide for the in-place preservation of significant archeological resources to the maximum extent feasible, consistent with the overall project objectives.

3. The NPS shall submit the Archeological Investigation Plan to the SHPO for review and comment. The NPS shall ensure that the work plan is implemented prior to the commencement of any construction activities.
4. Reporting shall meet the standards set forth in Stipulation VI.C below.

B. Construction Monitoring

1. A person meeting the Secretary of the Interior's Professional Qualifications Standards (48 FR 44738-39) for archeology will be on site during all ground disturbing activities with the exception of those described in stipulation X below, unless otherwise specifically directed by the park compliance coordinator after completing and documenting the streamlined review process.

C. Reporting

1. NPS shall provide the SHPO with a summary memo sufficient for making determinations of effect at the conclusion of any archeological fieldwork. The memo shall summarize the methodology and results of the fieldwork conducted, and provide a map depicting testing locations, a preliminary catalog, and photos where necessary to indicate where testing took place or illustrate points made in the text.
2. The SHPO shall comment on the summary memo and any determination that NPS has made, and provide guidance for the final report.
3. Reports shall minimally include the following information: purpose and scope of effort, background information, field and laboratory procedures/techniques and rationale for the methods used, results of fieldwork/laboratory analyses, discussion of findings, conclusions and recommendations, and an appendix of the artifact inventory in ANCS+.
4. The SHPO will be provided an opportunity to comment on draft reports before they are finalized. The SHPO will receive 2 (two) copies of the final report.
5. Should the SHPO not respond within 30 calendar days of receipt of a summary memo or a draft report, the NPS shall assume concurrence and commence with construction activities and/or finalizing the report.

D. Cataloging and Curation

1. With the exception of human remains and accompanying burial goods, which are addressed in stipulation VII, all artifacts will be:
  - a. placed in archivally stable containers (interlocking seal-and-closure polyethylene bags, and acid-free boxes);
  - b. curated at the Regional Archaeological Curation Facility at Fort Lee, Virginia along with archivally stable, original copies of field notes, data recording forms, maps, drawings, original negatives,

- photographs, slides, and any other form of documentation resulting from these archeological investigations;
- c. accessioned and cataloged in accordance with the NPS *Museum Handbook*; and
- d. cataloged using the NPS Automated National Cataloging System Plus (ANCS+).

## **VII. TREATMENT OF HUMAN REMAINS**

The NPS recognizes the CEMETERY as a final resting place and lasting memorial that commemorates this nation's veterans and their service to our Nation. The rehabilitation of the CEMETERY is being undertaken to honor their service. In recognition, the NPS will design the project in a way to minimize disturbance to graves. However, NPS understands that despite planning efforts, that graves may be disturbed. In this event, the following procedures will be followed.

- A. Human remains and associated burial goods encountered during archeological testing or monitoring will be noted as to location and depth. Testing will immediately stop and the remains will be reinterred where they were found. The area will then be shovel skimmed in order to determine the location of the burial shaft so that additional damage to the grave can be avoided by future actions.
- B. Human remains and associated burial goods discovered during the installation of gravestones will be collected and reinterred as close as possible to the location where the original remains came from without disturbing the grave a second time and at a great enough depth to prevent accidental disinterment in the future. The location where any remains were disinterred and reinterred will be indicated on a map of the cemetery.
- C. Accidental disinterment of human remains and burial during other activities will be immediately reinterred in the location from which they came as described in stipulation VII.A and work will be rerouted around the grave. Where that is not possible, as determined by an onsite archaeologist and the project manager, the reinterment will be handled as indicated in stipulation VII.B above providing that an entire grave has not been disturbed.
- D. If it is determined in the field that an entire grave will have to be moved, then the remains will be covered and secured and work will stop in the area until the SHPO can be consulted about the move and options for avoiding the grave have been explored.
- E. No human remains or burial goods will be removed from the site without prior consultation with the SHPO.
- F. No disinterred human remains or associated burial goods shall remain unburied at the close of any day, except where allowed by previous consultation with the SHPO in accordance with 36 CFR §800.13(b).
- G. The SHPO will receive a summary report at the conclusion of the UNDERTAKING mapping the location of disinterment and re-interment of any human remains uncovered by the UNDERTAKING as well as a written description of the actions taken during each instance of discovery.

## **VIII. INADVERTENT RESOURCE DISCOVERIES AND UNANTICIPATED EFFECTS**

If during construction previously unknown archeological resources are discovered, all work in the immediate vicinity of the discovery would be halted and the NPS will address the discovery and unanticipated effects in accordance with 36 CFR §800.13(b). In the event that Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, the regulations implementing the Native American Graves Protection and Repatriation Act (43 CFR Part 10) would be followed in accordance with the Plan of Action attached as Appendix A.

## **IX. OUTSIDE MONITORING OF CONSTRUCTION ACTIVITIES**

The SHPO may monitor activities pursuant to this agreement after providing at least 24-hours notification. The NPS will cooperate with the SHPO in carrying out any monitoring and review responsibilities.

## **X. MAINTENANCE ACTIVITIES**

- A. Routine and preservation maintenance activities will comply with the list of undertakings eligible for streamlined review in Section III of the 2008 Nationwide PA with the following additions:
  - 1. When graves have collapsed or been subjected to subsidence, the depression will be filled with screened soil and reseeded if necessary to maintain turf.
  - 2. If grave stones sink below standard height, they may be carefully removed; the socket filled with screened soil, and the marker replaced.
  - 3. If tree damage causes ground disturbance, the disturbed soil can be carefully re-graded to fill any holes, or clean soil may be used to fill holes, which will then be reseeded.
  - 4. The use of weed whips will be allowed around the new stones, with personnel trained to avoid damage to the stones.
- B. The park will prepare a preservation maintenance plan for the Cemetery. Once it has been reviewed and approved by the SHPO, the plan will be considered documentation for Section 106 purposes. Compliance will be reviewed annually by the Superintendent and compliance coordinator.

## **XI. ADMINISTRATIVE PROVISIONS**

- A. Professional Qualifications and Standards and Training
  - 1. All activities prescribed by this PA shall be carried out under the authority of the NPS by or under the direct supervision of a person or persons meeting at a minimum the Secretary of the Interior's Professional Qualifications Standards (48 FR 44738-39) in the appropriate disciplines.
  - 2. The park Compliance Coordinator will provide training on the terms and conditions of this PA to all persons supervising or conducting work related to the UNDERTAKING or maintenance of the CEMETERY, including seasonal and term staff and contractors. Training shall be appropriate to the person's duties.

3. Persons executing WORK shall possess craftsmanship skills in the material involved or be closely supervised by a skilled craftsman in that material
4. The Superintendent, Chief of Maintenance and COR will ensure persons supervising or conducting work related to the UNDERTAKING or maintenance of the CEMETERY are provided training in preservation maintenance philosophies and methods.

**B. Resolving Objections**

1. Should any party to this PA object at any time in writing to the manner in which the terms of this PA are implemented, to any action carried out or proposed with respect to implementation of the PA, or to any document prepared in accordance with and subject to the terms of the PA, the NPS and SHPO will consult for no more than 15 calendar days to resolve the objection and follow procedures as laid out in stipulation X of the Nationwide PA.
2. At any time during implementation of the terms of this PA, should a member of the public raise an objection pertaining to such implementation, the NPS shall immediately notify the SHPO in writing of the objection and take the objection into consideration. The NPS shall consult with the objecting party and, if the objecting party so requests, with the SHPO for no more than 15 calendar days. Within 15 calendar days following closure of this consultation period, the NPS will render a decision regarding the objection and notify the SHPO and BLC of its decision in writing. In reaching its decision, the NPS will take all comments from the public and the SHPO into consideration. The NPS's decision regarding resolution of the objection will be final.
3. The NPS shall provide the signatory parties to the PA and any parties that have objected pursuant to stipulation XI.B.1 or 2 above, with a copy of its final written decision regarding any objection addressed pursuant to that stipulation. The NPS may authorize any action subject to objection to proceed after the objection has been resolved in accordance with the terms of that stipulation.

**C. Annual Reports**

On or previous to October 31 of each year, NPS shall prepare and provide to the signatories of this PA an annual report addressing, at a minimum, the following topics:

1. a general summary of how this PA has been implemented during the preceding year;
2. a listing of UNDERTAKINGS reviewed and carried out in accordance with stipulations I through X, including a listing of all historic properties affected by the UNDERTAKINGS and the treatment of any human remains encountered;
3. NPS's assessment of the effectiveness of this PA;
4. any recommendations NPS may have for improving the PA.

The SHPO shall review the annual report and within thirty (30) days of its receipt provide comments to the NPS. If the SHPO objects to the adequacy of a report, the

NPS will consult with the SHPO to resolve the objection in accordance with stipulation XI.B above.

## **XII. AMENDMENTS**

Any signatory party to this PA may propose that this PA be amended, whereupon the signatory parties to this PA will consult to consider such amendment. This PA may be amended only upon the written agreement of all the signatory parties. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

## **XIII. TERMINATION**

- A. If any signatory proposes termination of this PA, the party proposing termination shall, in writing, notify the other party to this PA, explain the reasons for proposing termination, and consult with the other signatories to this PA for no more than 30 calendar days to seek alternatives to termination.
- B. Should such consultation fail, the signatory proposing termination may terminate this PA by promptly notifying the other signatories to this PA in writing. Termination hereunder shall render this PA without further force or effect.
- C. Should the PA be terminated, the NPS shall either consult in accordance with 36 CFR §800.6(a) and 36 CFR §800.14(b)(3) to develop a new PA or comply with 36 CFR Part 800 for individual undertakings.

## **XIV. DURATION OF THE PA**

Unless terminated pursuant to stipulation XIII, the duration of this PA is 5 years from the date of its execution. NPS shall initiate consultation with the other signatory parties to this PA approximately one year prior to the expiration date of the PA to reconsider its terms. Reconsideration may include the continuation of the PA as originally executed, or termination.

## **XV. EFFECTIVE DATE**

The PA will take effect on the date that it has been executed by the NPS and SHPO.

## **XVI. ANTI-DEFICIENCY ACT**

The NPS's obligations under this PA are subject to the availability of appropriated funds, and the stipulations of this PA are subject to the provisions of the Anti-Deficiency Act. The NPS shall make reasonable and good faith efforts to secure the necessary funds to implement its obligations under this PA. If compliance with the Anti-Deficiency Act alters or impairs the NPS's ability to implement its obligations under this PA, the NPS shall consult in accordance with the amendment and termination procedures found at Stipulation XIII A, B, and C above.

**EXECUTION** of this PA, its subsequent filing with the ACHP, and implementation of its terms evidence that the NPS has taken into account the effects of this Undertaking on

**DRAFT** 3/2/2010

historic properties and has afforded the ACHP an opportunity to comment on the Undertaking and its effect on historic properties.

## **SIGNATORIES**

### **National Park Service**

\_\_\_\_\_  
Superintendent, Petersburg National Battlefield

Date: \_\_\_\_\_

### **Virginia State Historic Preservation Officer**

\_\_\_\_\_  
Kathleen Kilpatrick  
State Historic Preservation Officer

Date: \_\_\_\_\_

## APPENDIX A

### PLAN OF ACTION

#### NATIVE AMERICAN GRAVE PROTECTION AND REPATRIATION ACT: PROCEDURES PETERSBURG NATIONAL BATTLEFIELD Poplar Grove National Cemetery

##### Background

The National Park Service is planning a major project to rehabilitate the landscape of Poplar Grove National Cemetery to return it to the dignified and solemn condition it was in 1933. There is no intention to disturb human remains during rehabilitation activities or during routine maintenance of the cemetery and its approach road. Nonetheless, given the fact that the cemetery was the repository of thousands of bodies disinterred from their original resting places and reinterred in the national cemetery, it is possible that ground disturbing activities could expose burial features and human remains. The most likely source for remains encountered would be small fragments lost during the initial cemetery interment of remains from original burial locations on the Civil War battlefields around Petersburg. These soldiers' remains would be handled as described in Section VII of the Programmatic Agreement.

However, the recent archeological testing and geophysical survey of Poplar Grove National Cemetery, a unit of Petersburg National Battlefield, as reported in *Phase I Archeological Survey: Rehabilitate Poplar Grove National Cemetery Project* prepared for Petersburg National Battlefield by A.D. Marble and Company (2008) revealed the presence of potentially significant historic and limited prehistoric resources of an unknown era within the cemetery enclosure aside from the obvious historic cemetery and its burials. Native American skeletal remains, associated funerary objects, sacred objects or objects of cultural patrimony have not been identified at Poplar Grove, but such finds are possible although unlikely.

The archeological work, which removed soil in two ten by twenty foot areas to a depth approximately 4 to 6 inches below present grade in order to expose grave shaft outlines, did not uncover any human remains.

However, construction activities associated with implementing the rehabilitation plan and routine maintenance activities may expose soldier's remains or Native American associated funerary objects, sacred objects or objects of cultural patrimony in specific, localized areas of the site.

These procedures focus on the very low possibility of finding Native American human skeletal remains and associated funerary objects. .

The kinds of objects to be considered as associated funerary objects as defined in 43 CFR Part 10.2(d) are the following:

Objects placed intentionally at the time of death or later with or near the human remains or within the burial pit. These items varied according to the status and rank of the individual.



- a. Historically and archaeologically, these items can include shell, bone, stone, copper and glass beads, pottery, shell and copper gorgets, masks and tools and various European trade items (i.e. metal objects, glass and shell beads).
- b. Sacred objects are specific ceremonial objects needed by traditional Native American religious leaders for the practice of traditional Native American religions by their present-day adherents. Objects falling under this definition have not yet been determined. Consultation will occur to determine whether or not objects recovered fall within this definition.
- c. Objects of Cultural Patrimony are items having ongoing historical, traditional, or cultural importance central to the Indian tribe rather than property owned by an individual. No objects have been determined under this definition. Consultation will occur to determine whether or not objects recovered fall within this definition.

### **Consultations and Determination of Custody**

NAGPRA regulations at 43CFR 10.3-10.7 describe the process regarding the custody of human remains, funerary objects, sacred objects or objects of cultural patrimony that are excavated intentionally from or discovered inadvertently on federal lands. 43 CFR 10.5 directs the government agency to notify and consult with federally recognized tribes on whose aboriginal lands the planned activity will occur; that are or likely to be culturally affiliated with human remains and cultural items that are likely to be excavated intentionally or inadvertently discovered; and that have a demonstrated cultural relationship with such remains or items. There are no present-day federally recognized Indian tribes who aboriginally occupied the area of the planned activity in Virginia and no known descendents of the people who lived at City Point in the pre- or post- contact eras that are members of federally recognized tribes. The National Park Service has consulted with the Catawba Indian Nation and the Tuscarora Nation, federally recognized tribes that are known to be associated with areas in the state of Virginia during the pre- and post-contact periods. These tribes indicated that they had no knowledge of potential cultural relationships with this area. In addition, the National Park Service, as part of the procedures for Sections 10.3 and 10.4, conducted research to identify lineal descendants and Indian tribes potentially entitled to custody of, or likely to be culturally affiliated with, human remains and cultural items that may be discovered. The Service was unable to identify federally recognized tribes pursuant to Sections 10.6 and 10.14 with whom to consult prior to the planned activity. Because no appropriate lineal descendants or Indian tribes were identified in this process, the National Park Service did not notify and consult with federally recognized Indian tribes prior to the planned activity and did not develop a plan of action as required under Section 10.5.

Any Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony will be excavated and removed consistent with the *Secretary of the Interior's Standards and Guidelines for Archeological Documentation* (48 FR 4434-37), the Director's Order 28, Technical Guidelines, and the SHPO's *Guidelines for Conducting Cultural Resource Survey in Virginia: Additional Guidance for the Implementation of the Federal Standards Entitled Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines* (48 FR 44742, September 29, 1983) 1999, rev. 2003. Unless and until an appropriate claimant is identified under 43 CFR Section 10.6, the National Park Service will follow the NPS Cultural Resource Management Guideline, Appendix R, Guidance for National Park Service

Compliance with NAGPRA, regarding unclaimed human remains, funerary objects, sacred objects, and objects of cultural patrimony if such are excavated or discovered unintentionally during the planned activity. This Guidance states:

Unclaimed Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony are those that are discovered inadvertently or excavated from park lands after November 16, 1990 for which either no claimant has been identified in accordance with the priority of custody as described in the regulations [43 CFR 10.6] or for which no claim has been received. NPS may retain possession of unclaimed Native American human remains and other cultural items until custody has been resolved or until regulations governing disposition of unclaimed Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony [43 CFR 10.7] have been finalized.

Without additional information, Petersburg National Battlefield would retain custody of remains or objects until Sec. 10.7 is promulgated.

### **Procedures for the Treatment and Removal of Human Remains and Funerary Objects Discovered Inadvertently or Excavated Intentionally at Poplar Grove National Cemetery**

In consultation with the Virginia State Historic Preservation Office and the Virginia Council on Indians, Petersburg National Battlefield agrees to the following procedures in the event of the intentional excavation or inadvertent discovery of Native American human remains, funerary objects, sacred objects or objects of cultural patrimony:

#### **I. Intentional Excavation of Native American Remains, Funerary Objects, Sacred Objects or Objects of Cultural Patrimony**

If human remains or suspected funerary objects, sacred objects or items of cultural patrimony are discovered at Poplar Grove during ground disturbing activities or archeological testing or excavations, the following procedures are to be followed:

1. The principal investigator shall notify the park superintendent or his designee and the park cultural resource manager.

2. An archeologist or physical anthropologist on the National Park Service staff, staff of the Virginia Department of Historic Resources, or qualified on-site archeological contractor or cooperator shall determine, if possible, whether the discovery is human, using knowledge, available texts and comparative samples, or other information.

3. Until a final determination can be made, all reports of human remains, funerary objects and other cultural items will be taken seriously and dealt with expeditiously by all personnel involved in the discovery. The principal investigator and park superintendent will take actions to secure the area and shield the remains or objects from exposure to the elements and to observation by the general public.

4. As soon as possible following the discovery and initial notification, the discovery will be evaluated by appropriate local law enforcement personnel to verify the remains are human and are not part of a crime scene. Following this, a determination will be made on whether or

not the remains are Native American. This will be accomplished by NPS cultural resources staff in conjunction with the above mentioned specialists. If a clear determination cannot be made, additional expertise will be obtained. If the remains are determined to be not Native American, their disposition will be determined by the superintendent in consultation with the park cultural resource manager and other interested parties. If the remains are determined to be Native American, and there is evidence that indicates there is a cultural relationship with a federally recognized tribe or tribes, within three days the superintendent will initiate consultations with such tribe(s) by telephone and certified mail and follow the procedures outlined in 43 CFR Part 10, Subpart B. If the remains are determined to be Native American, and there is no evidence to suggest there is a cultural relationship with any federally recognized tribe, within three days, the superintendent will initiate consultation with the Virginia SHPO and the Virginia Council of Indians by telephone and certified mail.

5. Following consultations, exposed remains and associated cultural items will be subject to preliminary archaeological recordation. Identification of the burial outline will be documented by taking dimensions, noting orientation and shape, and noting soil color. The soil surrounding the skeletal remains will be removed to expose the burial, and screened for artifacts. A sufficient number of measurements will be taken of the outline to permit reconstruction of the shape and dimensions of the pit after excavation. When the burial is completely exposed, sketches and diagrams will be drawn. Location, deposition, position, orientation, and depth will be recorded and complete measurement of the bones, artifacts, and pit will be noted while in situ. Any pathological conditions observed while in situ will be described in detail. No soil samples of the burial pit will be taken. No photographs of human remains will be taken. Estimation of sex, stature, and age will be documented while in situ. Additional non-destructive documentation of the remains and cultural items will be carried out in consultation with the Virginia SHPO and the Virginia Council of Indians.

6. It is likely that remains and objects will need to be removed for their physical safety and for further non-invasive study and cataloging. All remains and objects will be treated with respect, care and dignity. Human remains and objects will be inventoried to National Park Service standards. They will be stored in a secure location determined by the park curator in containers and materials determined in consultation with the Virginia Council of Indians until final disposition is arranged, as noted above.

7. A comprehensive report on the results of the archaeological investigation, inadvertent discoveries, the nearby soils, any other related forms of documentation, and a record of consultation with the Virginia Council of Indians shall be prepared and kept on file at Petersburg National Battlefield and the Northeast Regional Office.

## **II. Inadvertent Discovery of Native American Remains, Funerary Objects, Sacred Objects or Objects of Cultural Patrimony**

If human remains or suspected funerary objects, sacred objects or items of cultural patrimony are discovered at Poplar Grove during construction activities or archeological monitoring the following procedures are to be followed:

1. The discoverer shall notify the park superintendent or his designee, the construction manager and the park cultural resource manager.
2. An archeologist or physical anthropologist on the National Park Service staff, staff of the Virginia Department of Historic Resources, or qualified on-site archeological contractor or

cooperator shall determine, if possible, whether the discovery is human, using knowledge, available texts and comparative samples, or other information.

3. Until a final determination can be made, all reports of human remains, funerary objects and other cultural items will be taken seriously and dealt with expeditiously by all personnel involved in the discovery. If the discovery is an inadvertent discovery made in connection with an ongoing activity, the park superintendent will take measures to stop destructive activities, secure the area and to appropriately shield the remains or objects from exposure.

4. As soon as possible following the discovery and initial notification, the discovery will be evaluated by appropriate local law enforcement personnel to verify the remains are human and are not part of a crime scene. Following this, a determination will be made on whether or not the remains are Native American. This will be accomplished by NPS cultural resources staff in conjunction with the above mentioned specialists. If a clear determination cannot be made, additional expertise will be obtained. If the remains are determined to be not Native American, their disposition will be determined by the superintendent in consultation with the park cultural resource manager, park archeology advisor, and other interested parties. If the remains are determined to be Native American, and there is evidence that indicates there is a cultural relationship with a federally recognized tribe or tribes, within three days the superintendent will initiate consultations with such tribe(s) by telephone and certified mail and follow the procedures outlined in 43 CFR Part 10, Subpart B. If the remains are determined to be Native American, and there is no evidence to suggest there is a cultural relationship with any federally tribe, within three days, the superintendent will initiate consultation with the Virginia SHPO and the Virginia Council of Indians by telephone and certified mail.

5. Following consultations, exposed remains and associated cultural items will be subject to preliminary archaeological recordation. Identification of the burial outline will be documented by taking dimensions, noting orientation and shape, and noting soil color. The soil surrounding the skeletal remains will be removed to expose the burial, and screened for artifacts. A sufficient number of measurements will be taken of the outline to permit reconstruction of the shape and dimensions of the pit after excavation. When the burial is completely exposed, sketches and diagrams will be drawn. Location, deposition, position, orientation, and depth will be recorded and complete measurement of the bones, artifacts, and pit will be noted while in situ. Any pathological conditions observed while in situ will be described in detail. No soil samples of the burial pit will be taken. No photographs of human remains will be taken. Estimation of sex, stature, and age will be documented while in situ. Additional non-destructive documentation of the remains and cultural items will be carried out in consultation with the Virginia SHPO and the Virginia Council of Indians.

6. It is likely that remains and objects will need to be removed for their physical safety and for further non-invasive study and cataloging. All remains and objects will be treated with respect, care and dignity. Remains and objects will be cataloged to National Park Service standards. They will be stored in a secure location determined by the park curator in containers determined in consultation with the Virginia Council of Indians until final disposition is arranged, as noted above.

7. A comprehensive report on the results of the archaeological investigation, inadvertent discoveries, the nearby soils, any other related forms of documentation, and a record of consultation with the Virginia Council of Indians shall be prepared and kept on file at Petersburg National Battlefield and the Northeast Regional Office.

8. Construction activities can resume as soon as the superintendent determines the remains and objects have been removed from the construction area in the process outlined above.

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Superintendent, Petersburg National Battlefield

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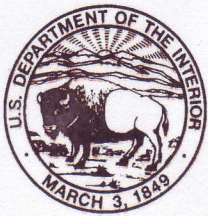
Date



## **APPENDIX B: RELEVANT AGENCY CORRESPONDENCE**







United States Department of the Interior  
NATIONAL PARK SERVICE

PETERSBURG NATIONAL BATTLEFIELD  
1539 Hickory Hill Road  
Petersburg, Virginia 23803-4721



In Reply Refer to:

D2215

February 25, 2009

Ref: PETE (PEPC 12006/PMIS 89424)

Kelly Yasaitis Fanizzo  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW  
Suite 803  
Washington, DC 20004

Dear Ms. Fanizzo:

The National Park Service, Petersburg National Battlefield (NPS) proposes to rehabilitate Poplar Grove National Cemetery in Petersburg, Virginia to restore its integrity of feeling and improve its diminished integrity of design, setting, materials, workmanship, and association. Poplar Grove National Cemetery is listed in the National Register of Historic Places as part of Petersburg National Battlefield and NPS is proposing to develop a programmatic agreement (PA) to guide the rehabilitation.

The preferred alternative, as outlined in an environmental assessment currently under development, would rehabilitate Poplar Grove National Cemetery to 1933 or the end of the War Department era (1869 through 1933). This would include setting new upright gravestones to reflect the original pre-1933 positioning of the grave markers. After 1933, the grave markers were re-positioned to lie flush with the ground, an action that altered the original solemn and dignified effect of the burial grounds. Additional changes would include the rehabilitation of the landscape with new plantings, the re-establishment of some lost landscape features, correction of drainage problems, and upgrading of visitor facilities. The proposed rehabilitation has received extensive public review and input through the 2004 General Management Plan, a draft cultural landscape report, and scoping for a soon-to-be released environmental assessment in accordance with the National Environmental Policy Act and 36 CFR 800.2 and 800.8.

Because the project may be done in stages and there is potential to disturb human remains, or previously undiscovered archeological resources from the Civil War encampment that the cemetery is named for, the NPS decided that a PA for dealing with potential adverse effects from the undertaking would be appropriate and is consulting with the Virginia State Historic Preservation. We anticipate including a draft of the PA in the environmental assessment for this project that will be released for public review in the spring.

Additionally, the park undertakes ongoing, routine maintenance activities on the grounds, structures, and other features at Poplar Grove National Cemetery. Many of these undertakings are eligible under

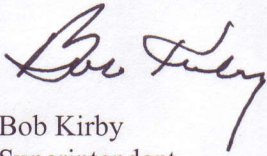


the provisions of the 2008 Nationwide Programmatic Agreement for streamlined review processes, but we would like to add certain types of undertakings to the list of undertakings eligible for streamlined review.

In accordance with the regulations issued pursuant to the National Historic Preservation Act of 1966, as amended, we are inviting the Advisory Council to participate in these consultations.

If you have any questions, please contact Julia Steele of my staff at 804-732-0171 extension 304 or by e-mail at [Julia\\_Steele@nps.gov](mailto:Julia_Steele@nps.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Bob Kirby", with a stylized flourish at the end.

Bob Kirby  
Superintendent

cc: Virginia SHPO





# COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.  
Secretary of Natural Resources

**Department of Historic Resources**  
2801 Kensington Avenue, Richmond, Virginia 23221-0311

Kathleen S. Kilpatrick  
Director

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Fax: (804) 367-2391  
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[www.dhr.virginia.gov](http://www.dhr.virginia.gov)

July 16, 2009

Julia Steele  
Cultural Resource Manager  
Petersburg National Battlefield  
5001 Siege Road  
Petersburg, VA 23803

Re: Draft Cultural Landscape Report for Poplar Grove National Cemetery  
Dinwiddie County  
DHR File No. 2007-1072

Dear Ms. Steele,

Thank you for taking the time to meet with me and with Ethel Eaton on April 3 and for providing us with a 95% draft copy of the *Cultural Landscape Report for Poplar Grove National Cemetery, Petersburg National Battlefield* (CLR) dated October 2006 for our review and comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. DHR apologizes for the delay in our response.

We understand that this information was provided in order to obtain our concurrence on the categorization of contributing and non-contributing landscape characteristics and associated features of Poplar Grove National Cemetery. The report also has the objective of assisting in planning for the upcoming line item construction project 'Restore Facilities, Resources & Character Defining Elements to National Cemetery Standards.' The proposed construction project, which the CLR will guide, is intended to restore the property's historic character and improve visitor safety, orientation, and interpretation.

As you know, the Petersburg National Battlefield (DHR ID# 123-0071) was administratively listed in the National Register of Historic Places in 1966, and Poplar Grove National Cemetery is a contributing resource. As such the cemetery must therefore be considered an historic property for the purposes of Section 106.

According to the *Cultural Landscape Report for Poplar Grove National Cemetery, Petersburg National Battlefield*, the National Park Service (NPS) recommends that Poplar Grove National Cemetery is eligible under Criterion A in the area of military history for its intimate association with the Civil War, 1861-1865, and as a component of the National Cemetery System and is eligible also under Criterion C in the area of landscape architecture. NPS

Administrative Services  
10 Courthouse Avenue  
Petersburg, VA 23803  
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Capital Region Office  
2801 Kensington Ave.  
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Tel: (804) 367-2323  
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Tidewater Region Office  
14415 Old Courthouse Way, 2<sup>nd</sup> Floor  
Newport News, VA 23608  
Tel: (757) 886-2807  
Fax: (757) 886-2808

Roanoke Region Office  
1030 Penmar Ave., SE  
Roanoke, VA 24013  
Tel: (540) 857-7585  
Fax: (540) 857-7588

Northern Region Office  
5357 Main Street  
PO Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
Fax: (540) 868-7033

recommends that the overall period of significance for Poplar Grove National Cemetery under Criterion A is identified as 1866-2003, and the period of significance for the landscape is 1866-1933. The CLR identified a total of fifty-six (56) features. Thirty-three (33) were evaluated as contributing; twenty-two (22) were evaluated as non-contributing, and one (1) feature was identified but not evaluated. (*See attached list.*) Based upon a review of the information provided, DHR concurs.

We look forward to receiving the final CLI report to include the Treatment section once it is available and continuing consultation on the proposed rehabilitation and restoration of Poplar Grove National Cemetery. We would appreciate receiving two (2) bound copies of the CLI for our review in accordance with our state survey guidelines. If we may provide any further assistance or if you have any questions about our comments, I may be reached via email at [amanda.lee@dhr.virginia.gov](mailto:amanda.lee@dhr.virginia.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Amanda Lee". The signature is fluid and cursive, with the first name "M." and the last name "Amanda Lee" clearly distinguishable.

M. Amanda Lee, Historic Preservationist  
Office of Review and Compliance

C: Ethel Eaton, DHR

**Contributing landscape features –  
thirty (33)**

- Natural Systems and Features
  - north inclosure woods
  - east inclosure woods
  - south inclosure woods
- Spatial Organization
  - cemetery approach
  - north field
  - south field
  - Odom Tract field
  - south pasture
  - cemetery inclosure space
  - lodge grounds
  - burial grounds
- Circulation
  - approach road
  - main drive
  - burial grounds drive
  - burial grounds walks
  - walk from lodge to restrooms
- Vegetation
  - specimen trees
  - specimen shrubs
  - cemetery lawn
- Buildings and Structures
  - inclosure and gateway
  - lodge
  - garage
  - public restroom building
  - rostrum
- Views and Vistas
  - vista of gateway from approach road
  - view of grave markers from flagstaff
  - vista of flagstaff from main drive
- Small-scale Features
  - stone-post corner boundary markers
  - Civil War-type grave markers
  - private/other grave markers
  - rectangular flat grave marker
  - gun monument

- Archaeological Sites
  - graves

**Non-contributing landscape features –  
twenty-two (22)**

- Natural Systems and Features
  - triangular woodlot
  - Odom Tract woods
  - south inclosure hedgerow
- Spatial Organization
  - Odom cemetery and service yard
- Circulation
  - private driveway
  - visitor parking area
  - service drive
  - dirt path
- Vegetation
  - approach road allee
  - inclosure ivy groundcover
  - inclosure red cedars
- Buildings and Structures
  - flagstaff
- Small-Scale Features
  - entrance sign
  - barbed-wire fence
  - wood privacy fence between public restrooms and lodge
  - rectangular flat grave marker
  - general-type grave marker
  - radial drive markers
  - flagstaff floodlight
  - grave locator interpretive signs
  - miscellaneous contemporary small-scale features

**Not evaluated landscape feature – one  
(1)**

- Small-scale Features
  - concrete square pads near flagstaff



L. Preston Bryant, Jr.  
Secretary of Natural Resources



Joseph H. Maroon  
Director

**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF CONSERVATION AND RECREATION**

217 Governor Street  
Richmond, Virginia 23219-2010  
(804) 786-7951 FAX (804) 371-2674

October 24, 2008

Superintendent  
Petersburg National Battlefield  
1539 Hickory Hill Road  
Petersburg, VA 23803

Re: Poplar Grove National Cemetery

Dear Mr. Superintendent:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

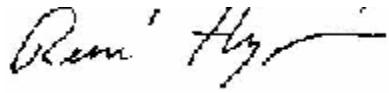
Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, that may contain information not documented in this letter. Their database may be accessed from [www.dgif.virginia.gov/wildlife/info\\_map/index.html](http://www.dgif.virginia.gov/wildlife/info_map/index.html), or contact Shirl Dressler at (804) 367-6913.

Should you have any questions or concerns, feel free to contact me at 804-371-2708. Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Rene' Hypes", with a long horizontal flourish extending to the right.

S. Rene' Hypes  
Project Review Coordinator



United States Department of the Interior  
NATIONAL PARK SERVICE

PETERSBURG NATIONAL BATTLEFIELD  
1539 Hickory Hill Road  
Petersburg, Virginia 23803-4721



In Reply Refer to:

D18  
L7617

September 24, 2008

Dear Friend of Petersburg National Battlefield,

Please join us on Wednesday, October 8, 2008 for a public meeting to discuss ideas on the rehabilitation of Poplar Grove National Cemetery. The meeting will be held from 10:00 a.m. to 12:00 noon, and again from 6:00 p.m. to 8:00 p.m. at the Dinwiddie County Historical Society, Old Dinwiddie Courthouse, Dinwiddie, Virginia. Your input will be used to craft alternatives for the future rehabilitation and management of the cemetery and will be documented in an Environmental Assessment.

Poplar Grove National Cemetery is comprised of 8.72 acres and contains the remains of 6,181 U.S. Soldiers from the Civil War and 60 non-Civil War burials. Petersburg National Battlefield has sought funding for much needed rehabilitation of the cemetery. It is hoped that the project will be funded in 2013.

To ensure this project is done well, we need your thoughts and input in the planning process. We want to consider all viable alternatives for this initiative. We have prepared a draft Cultural Landscape Report to provide the historical context for the National Cemetery's establishment, significance, stewardship and challenges pertaining to its continued preservation. The report offers several possible management strategies which will be discussed at the public meeting.

The report is available at [www.nps.gov/pete](http://www.nps.gov/pete) (click on the tab labeled Management, then on Park Projects). It is also available in hard copy at the park's three visitor contact stations or at park headquarters. It is available on CD ROM or in hardcopy at local libraries in the Petersburg vicinity. You may also obtain a copy by contacting us at (804)732-3571.

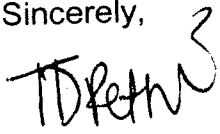
Public comments on the Cultural Landscape Report's recommendations and the future rehabilitation and management of Poplar Grove National Cemetery will be accepted until October 24, 2008. Please address your comments to Superintendent, Petersburg National Battlefield, 1539 Hickory Hill Road, Petersburg, VA 23803 or via e-mail to [pete\\_superintendent@nps.gov](mailto:pete_superintendent@nps.gov).



Comments, including names and addresses of respondents, will be available for public review at park headquarters. Individual respondents may request their address be withheld from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this at the beginning of your comment. We will make all submissions from individuals identifying themselves as representatives or officials of agencies, organizations or businesses, available for public inspection in their entirety.

For more information or questions concerning this scoping process, please contact Dave Shockley, Chief of Resource Management, at (804) 732-0171 ext 305.

Sincerely,

A handwritten signature in black ink, appearing to read "T. D. Retman" with a stylized flourish at the end.

Acting Superintendent  
Petersburg National Battlefield



United States Department of the Interior  
NATIONAL PARK SERVICE

PETERSBURG NATIONAL BATTLEFIELD  
1539 Hickory Hill Road  
Petersburg, Virginia 23803-4721



In Reply Refer to:

D18

Dear Friend:

Planning for the rehabilitation and restoration of Poplar Grove National Cemetery has begun. The National Park Service has identified fiscal year 2012 as the proposed date for funding this project. In order to be prepared to begin reconstruction and rehabilitation activities, many planning components must be completed beforehand. That is where you may be of assistance.

One of the first steps we will take to ensure this project is done correctly is to involve the public in the planning process. In order to develop a vision for this restoration/rehabilitation initiative, we want to consider as wide a range of viable alternatives as possible. Your input is critical. Preliminary work on a Cultural Landscape Report (CLR) for Poplar Grove National Cemetery has been started. This DRAFT CLR (enclosed) provides the historical context for the National Cemetery's (NC) establishment, stewardship successes and failures and a glimpse of some of the unique challenges we face to ensure its continued preservation. Our hope is that this document will provide you, the reader, with an understanding of the significance of the site, a glimpse of the challenges that lie ahead and a sound framework for which future management strategies can be identified.

**On Friday, September 28, 2007 from 9:00 a.m. to 12:00 noon and again from 1:00 p.m. to 4:00 p.m.** at the Education Building at Pamplin Historical Park in Dinwiddie County, Virginia (directions enclosed) stakeholders and the public are invited share in a civic dialogue about the future of Poplar Grove NC. Your participation in either one of these sessions is requested. Your input will be used to define management prescriptions for the cemetery's future restoration activities.

For those of you not familiar with Poplar Grove NC, an hour-long tour of the site will be offered at two different times prior to the day-long Wednesday meeting. Those times are:

- Thursday afternoon (9/27) at 4:00 p.m.
- Friday morning (9/28) at 7:30 a.m.

Please meet at Poplar Grove NC. (Directions enclosed).

We look forward to your participation in this interesting and important planning process. If you have any questions, please do not hesitate to call me at 804/732-3571X105. Thank you in advance for your involvement.

Sincerely,

Bob Kirby  
Superintendent

Encls:



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 land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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April 2010

