



APPENDIX **E**

PUBLIC COMMENTS RECEIVED ON THE DRAFT GMP/EIS

CEDAR CREEK AND BELLE GROVE NATIONAL HISTORICAL PARK



Appendix E

Public Comments Received on the Draft GMP/EIS

NPS received 35 comments on the draft GMP/EIS that were received or postmarked through February 27, 2009 (the close of the comment period) and that are reprinted here in Appendix E.

Comments included letters, e-mails, faxes, comment forms, public meeting comments, and electronic comments submitted through the NPS Planning, Environment and Public Comment (PEPC) web site.

This **Appendix E** includes the following:

Table E.1 List of All Comments Received on Draft GMP/EIS (postmarked by the 2/27/2009 close of the comment period) (page E-2)

Table E.2 Comments Received on the NPS Planning, Environment and Public Comment (PEPC) Website (page E-3)

Table E.3 Comments Received at the Draft GMP/EIS Public Meetings (page E-12)

Following Table E.3 Copies of hard copy comments received

Following the close of the comment period, the park received five letters from individuals, two letters from a member of the park's congressional delegation, and a petition containing 304 names. Although the comments received after the close of the comment period are not reprinted here in Appendix E, they are a part of the administrative record.

Appendix F contains the NPS's analysis of the comments received on Draft General Management Plan/Environmental Impact Statement.

Table E.1 List of All Comments Received on Draft GMP/EIS (postmarked by the 2/27/2009 close of the comment period)

Organization or Individual	Signed By	Format	Date
Belle Grove Board of Directors	Individual Board Members	Hard Copy	2/25/2009
Belle Grove, Inc.	Elizabeth McClung, Phil Griffin	Hard Copy	2/27/2009
Cedar Creek and Belle Grove National Historical Park Advisory Commission	All Commissioners	Hard Copy	2/9/2009
Cedar Creek Battlefield Foundation	Stan Hirschberg	Hard Copy	2/23/2009
Civil War Preservation Trust	James Lighthizer	Hard Copy	2/27/2009
Frederick County	Board of Supervisors	Hard Copy	2/25/2009
Middletown, Town of	Mayor and Town Council	Hard Copy	2/9/2009
National Parks Conservation Assoc.	Catherine Gilliam	PEPC ⁽¹⁾ and Email	2/27/2009
National Trust for Historic Preservation	Richard Moe	Hard Copy and Email	2/27/2009
Preserve Frederick	Wendy Hamilton	Hard Copy and Email	2/25/2009
Shenandoah County	Board of Supervisors	Hard Copy	2/24/2009
Shenandoah County Parks and Recreation	Pamela J. Sheets	PEPC ⁽¹⁾	2/24/2009
Shenandoah Forum	Kim Woodwell	Hard Copy	2/24/2009
Shenandoah Valley Battlefields Foundation (comments)	Irvin Hess, Elizabeth Stern	Email	2/27/2009
Shenandoah Valley Battlefields Foundation (technical suggestions)	None (received from Elizabeth Stern)	Email	2/27/2009
Shenandoah Valley Network	Kate Wofford	PEPC ⁽¹⁾	1/27/2009
Strasburg, Town of	Mayor	Hard Copy	2/10/2009
Trout Unlimited	Seth Coffman	Hard Copy and Email	2/5/2009
U.S. Environmental Protection Agency, Region 3	Barbara Okorn	Hard Copy	2/26/2009
Virginia Department of Conservation and Recreation	John Davy	Hard Copy	1/15/2009
Virginia Department of Conservation and Recreation, Division of Natural Heritage	Sandra R. Hypes	PEPC ⁽¹⁾	1/26/2009
Virginia State Historic Preservation Office	Ethel Eaton	PEPC ⁽¹⁾	2/27/2009
Warren County	Board of Supervisors	Hard Copy	2/17/2009
Individual	Adamson, Barbara	Public Meeting	1/28/2009
Individual	Allamong, Larry	Public Meeting	1/28/2009
Individual	Blount, David	Email	2/3/2009
Individual	Golden, Susan	Email	2/27/2009
Individual	Harding, Joan	Public Meeting	1/29/2009
Individual	Hirschberg, Stan	Public Meeting	1/28/2009
Individual	Jagiello, Walter	Email	2/27/2009
Individual	Kehoe, Michael	Hard Copy	2/22/2009
Individual	Pfeifer, Catherine	Public Meeting	1/29/2009
Individual	Private Individual, Winchester	PEPC ⁽¹⁾	2/25/2009
Individual	Van Meter, Val	Hard Copy	2/27/2009
Individual	Van Norton, Richard	Email	2/25/2009

⁽¹⁾ PEPC – Comment made using the NPS Planning Environment and Public Comment (PEPC) website.

Table E.2 Comments Received on the NPS Planning, Environment and Public Comment (PEPC) Website

Commenter	Comment
<p>Catherine Gilliam (February 27, 2009)</p>	<p>Dear Superintendent Jacox:</p> <p>On behalf of the National Parks Conservation Association (NPCA), I am pleased to offer comments on the November 2008 Draft General Management Plan (GMP). In more than 85 years, NPCA has grown to represent 340,000 members through our national headquarters and 24 regional and field offices, all working to "protect and enhance America's National Park System for present and future generations." NPCA actively encouraged the creation of Cedar Creek & Belle Grove National Historic Park (CEBE) and applauds Congress and the National Park Service (NPS) for the accomplishments toward realizing the full potential and contribution of one of America's most recent national park units for the benefit of the region and the nation.</p> <p>STRONGLY ENDORSE PREFERRED ALTERNATIVE D</p> <p>NPCA strongly and enthusiastically endorses the Alternative D as described in the GMP. The analysis provided of the other options demonstrates the importance of moving ahead with the steps and goals articulated. The protection of the parks natural and cultural resources will be most responsibly undertaken with the Alternative D tools and strategy. The past few years have demonstrated the significant challenges that all partners face in long term protection of the park's resources against multiple serious threats as the area faces significant growth and industrial pressures. CEBE offers an opportunity to develop an exceptional interpretation and education program. With a unique partnership park it is critical to take the approach described in Alternative D in order to achieve this level of quality. Visitor services and the ability to offer the most experience for future visitors will be significantly improved under Alternative D. The management of this partnership park will present many challenges to take full advantage of the key partners, as well as maximize the use of assistance from outside sources. Alternative D describes the most workable management structure and will allow successful long term cooperation and park protection.</p> <p>Extensive technical assistance is facilitated under Alternative D and we believe will be critical to strengthening the relationship among the key partners and achieving long term goals for mutual benefit.</p> <p>IMPORTANCE OF PARTNERSHIP PARKS</p> <p>Increasingly, the National Park Service is exploring creative and more effective park management models. In many places around the country as demonstrated by CEBE partnering with other agencies, organizations and landowners is the best solution. The future success of CEBE we believe can serve as an outstanding example of the partnership park approach.</p> <p>MANAGEMENT ZONES ARE KEY</p> <p>A particularly strong feature of the Draft GMP is the definition of the Management Zones. These zones must be clearly understood and responsibly and consistently enforced in the future. There is likely to be pressure, driven by short term perspective, to modify these management zones and it will be important to manage and make decisions that will protect the integrity of the zone concept and definitions.</p>

Table E.2 Comments Received on the NPS Planning, Environment and Public Comment (PEPC) Website

Commenter	Comment
	<p>BOUNDARIES NEED FOR EARLY, COMPREHENSIVE STUDY The GMP defers the issue of the appropriate boundaries for CEBE to a future study. While this is understandable given the challenge of such a multi-faceted planning process, it is important that a study of the boundary be conducted in the near future. Public understanding and support will be strengthened by a full boundary study with strong public participation.</p> <p>NEED FOR ADEQUATE BUDGET CEBE will only fulfill its legislative mandate with adequate staffing, initial investment and long term operating budget. The budget figures provided in Alternative D seem to be a bare minimum that will be needed for this park unit to achieve the mission set by Congress, but represent a responsible estimation for implementing this GMP.</p> <p>EXTERNAL THREATS Cedar Creek & Belle Grove has already faced external threats that heighten the challenge of protecting this park. The proposed expansion of the adjacent mining operation and the widening of Interstate-81 are the two most prominent examples. It will be important to enforce the protection provisions especially for other federal agencies fully in the short and long term.</p> <p>ENGAGING MANY PARTNERS AND TAPPING DIVERSE RESOURCES There is understandable emphasis in the Draft GMP on Key Partners and Community Partners. The draft underemphasizes the contributions that can and should be made by a much broader group of potential partners. These will be found both in a larger definition of geographic reach and in a more creative exploration of the types of partners and the tools financial, legal, educational, etc. that can be utilized in managing and providing support for the park.</p> <p>Thank you for the opportunity to comment. NPCA appreciates the careful and thorough work demonstrated in the development of this draft GMP and the process that has encouraged full public participation. We expect to continue to be enthusiastically build support for Cedar Creek & Belle Grove NHP and contributing to the public's engagement in the future.</p> <p>Sincerely, Catharine M. Gilliam Virginia Program Manager</p>
James Hines (November 17, 2008)	Please mail me a paper copy of the draft GMP for Cedar Creek and Belle Grove NHP Thank you
Sandra Rene Hypes (January 26, 2009)	January 26, 2009 Diann Jacox National Park Service Cedar Creek & Belle Grove National Historical Park P.O. Box 700 Middletown, VA 22645

Table E.2 Comments Received on the NPS Planning, Environment and Public Comment (PEPC) Website

Commenter	Comment
	<p>Re: Cedar Creek & Belle Grove National Historical Park Management Plan</p> <p>Dear Ms. Jacox:</p> <p>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.</p> <p>According to the information currently in our files, the North Fork Shenandoah River-Strasburg Stream Conservation Unit has been documented downstream from the project location. Stream Conservation Units (SCUs) identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. This site has been ranked as a B5 conservation site, which indicates it is of general biodiversity significance. The natural heritage resources associated with this conservation site are:</p> <p>Alasmidonta varicosa Brook Floater G3/S1/NL/LE Lampsilis cariosa Yellow Lampmussel G3G4/S2/NL/SC Lasmigona subviridis Green Floater G3/S2/NL/LT</p> <p>The brook floater is a small rare mussel species that typically occurs in and near riffles and rapids of smaller creeks with rocky or gravelly substrates. Threats include poor water quality, as this species does not tolerate silt or nutrient pollution well (Stephenson, 1991). Please note that the brook floater is listed as endangered by Virginia Department of Game and Inland Fisheries (VDGIF).</p> <p>The yellow lampmussel averages about 70 mm in length but can reach a length of 130 mm (Johnson, 1970). The yellow lampmussel is found in larger streams and rivers where good currents exist over a sand and gravel substrate and in small creeks and ponds. This species is known to occur in the Potomac, York, and Chowan river basins (TNC, 1996). Please note that this species is currently classified as a special concern species by VDGIF; however, this designation has no official legal status.</p> <p>The green floater is a rare freshwater mussel that ranges from New York to North Carolina in the Atlantic Slope drainages, as well as the New and Kanawha River systems in Virginia and West Virginia. Throughout its range, the green floater appears to prefer the pools and eddies with gravelly and sandy bottoms of smaller rivers and creeks or of smaller channels of large rivers (Ortman, 1919). According to Riddick (1973), in central Virginia, the green floater prefers habitats with gravel or sand bottoms in small to medium-sized streams. Green floaters are small, usually reaching a length less than 55mm. The color on the shell varies from pale yellow to brownish green. There may be numerous narrow or wide green or blackish rays on the shell surface, mostly on juveniles (Kitchel, 1991). Please note, as of July 2006 the green floater is now listed as state threatened by Virginia Department of Game and Inland Fisheries (VDGIF).</p>

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Commenter	Comment
	<p>Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.</p> <p>The project area is also within the Panther and Panther2 Conservation Sites. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. The Panther Conservation Site has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resources associated with this site are:</p> <p>Montane Dry Calcareous Forest/Woodland GNR/SNR/NL/NL Canby's mountain-lover Paxistima canbyi G2/S2/SOC/NL</p> <p>Montane Dry Calcareous Forest and Woodlands occur on subxeric, fertile habitats over carbonate formations of limestone or dolomite. Habitats are steep, usually rocky, south- to west-facing slopes at elevations from < 300 to 900 m (< 1,000 to 2,900 ft). Soils vary from circumneutral to moderately alkaline and have high calcium levels. Confined in Virginia to the mountains, these communities are most frequent and extensive in the Ridge and Valley, but occur locally in both the Blue Ridge and Cumberland Mountains. Tree canopies vary from nearly closed to sparse and woodland-like (Fleming et al., 2006).</p> <p>Canby's mountain-lover is a low evergreen shrub that occurs on limestone bluffs and cliffs and shaly slopes, often overlooking streams and rivers (The Nature Conservancy, 1996). This species is currently known from 15 occurrences, and historically known from multiple additional occurrences, in Virginia. DCR recommends surveying this area for Canby's mountain lover and other species that are possible within this habitat.</p> <p>The Panther2 Conservation Site has been given a biodiversity significance ranking of B4, which represents a site of moderate significance. The natural heritage resource associated with this site is:</p> <p>Significant Cave G3/SNR/NL/NL</p> <p>The Bent milkvetch (<i>Astragalus distortus</i> var. <i>distortus</i>, G5T5?S1/NL/NL) has also been documented in the project area. Bent milkvetch typically inhabits shale barrens, slaty hillsides, and limestone outcrops (The Nature Conservancy, 1996). Bent milkvetch is currently known from seven occurrences in Virginia, six of which are historic.</p>

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	<p>Furthermore as stated on p. 3-60 of the general management plan, the project area is within a section of Cedar Creek and Meadow Brook that has been designated by the VDGIF as being "Threatened and Endangered Species Water" for the Wood turtle (<i>Glyptemys insculpta</i>, G4/S2/NL/LT). The project area is also within a section of the North Fork Shenandoah River-Strasburg SCU that has been designated by the VDGIF as being "Threatened and Endangered Species Water" for the Brook Floater.</p> <p>The Cedar Creek and Belle Grove National Historic Park (NHP) lies almost entirely on a well-developed karst landscape typical of the Shenandoah Valley. A single designated significant cave - Panther Cave - lies within the park boundary. The remainder of the property almost certainly hosts several globally rare subterranean aquatic species, including but not limited to Shenandoah Valley Cave Amphipod (<i>Stygobromus gracilipes</i>, G3G4/S2S3/NL/SC), Biggers Cave Amphipod (<i>Stygobromus biggersi</i>, G2G4/S1S2/NL/NL) and Price's Cave Isopod (<i>Caecidotea pricei</i>, G5/S3/NL/NL). Caves inaccessible to humans are also likely to host Thin-neck cave beetle (<i>Pseudanophthalmus parvicollis</i>, G1/S1/NL/NL). Please coordinate with Wil Orndorff (540-394-2552) to document and avoid impacts to caves and other karst resources.</p> <p>In addition as stated on page 3-61 of the Cedar Creek and Belle Grove NHP General Management Plan Grove, Ogdens Cave Natural Area Preserve is in the project vicinity. The Appalachian springsnail (<i>Fontigens bottimeri</i>, G2/S2/NL/LE) has been documented in Ogdens Cave and has potential to occur within the project area if suitable habitat exists. The Appalachian springsnail is a 'stubby' appearing snail of springs, seeps, and caves in the Potomac River basin of Washington D.C. and Maryland, and the Shenandoah River basin of northwestern Virginia (Hershler et al., 1990). Dillon (2008) cites Hershler et al. (1990) with one location from a cave in Frederick County, and accounts a second locality from a spring, also in Frederick County. Please note that this species has been listed as state endangered by the Virginia Department of Game and Inland Fisheries (VDGIF).</p> <p>Threats to the Appalachian springsnail include any disruption of water flow or water quality. These disruptions may include impacts from tree removal, creation of impermeable surfaces (e.g. pavement), and water pollution from urban runoff.</p> <p>DCR recommends surveying for the Shenandoah Valley Cave Amphipod, the Biggers Cave Amphipod and the Appalachian springsnail within springs and seeps on the property. With the survey results we can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources. DCR also recommends avoidance of documented natural heritage resources within the project area. During any clearing, road and/or trail construction, at least a 300ft buffer should be maintained along the creek bluffs and best management practices implemented to protect resources. Furthermore, to minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Finally, due to the legal status of the Wood turtle the Brook floater and the Appalachian springsnail, DCR</p>

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Commenter	Comment
	<p>recommends coordination with VDGIF to ensure compliance with the protected species legislation.</p> <p>Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and 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.</p> <p>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.</p> <p>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 http://vafwis.org/fwis/ or contact Shirl Dressler at (804) 367-6913.</p> <p>Thank you for the opportunity to comment on this project.</p> <p>Sincerely, S. Rene Hypes Project Review Coordinator</p> <p>CC: Ernie Aschenbach, VDGIF Wil Orndorff, DCR-Karst Literature Cited</p> <p>Dillon, R. T. 2008. Freshwater Gastropods of North America: Fontigens bottimeri. At: http://www.cofc.edu/~fwgna/species/hydrobiidae/f_bottimeri.html. Accessed 20Jan2009.</p> <p>Fleming, G.P., P.P. Coulling, K.D. Patterson, and K. Taverna. 2006. The natural communities of Virginia: classification of ecological community groups. Second approximation. Version 2.2. Virginia Department of Conservation and Recreation, Division of Natural Heritage, Richmond, VA. http://www.dcr.virginia.gov/dnh/ncintro.htm.</p> <p>Hershler, R., J.R. Holsinger, and L. Hubricht. 1990. A revision of the North American freshwater snail genus Fontigens (Prosobranchia: Hydrobiidae). Smithsonian Contributions to Zoology 509: 1-49.</p> <p>Johnson, R.I. 1970. The systematics and zoogeography of the Unionidae (Mollusca: Bilvava) of the southern Atlantic slope region. Bulletin Museum of Comparative Zoology vol 140(6): 362-365.</p> <p>Kitchel, L. 1991. Green Floater. In Virginia's Endangered Species: Proceedings of a Symposium. K. Terwilliger ed. The McDonald and Woodward Publishing Company, Blacksburg, Virginia.</p>

Table E.2 Comments Received on the NPS Planning, Environment and Public Comment (PEPC) Website

Commenter	Comment
	<p>Mitchell, J. C. 1994. Reptiles of Virginia. Smithsonian Institution Press, Washington. pp. 88-91.</p> <p>Ortman, A.E. 1919. A monograph of the naiades of Pennsylvania, Part 3: Systematic account of the genera and species. Mem. Carnegie Mus. 8: 1-384.</p> <p>Riddick, M.B. 1973. Freshwater mussels of the Pamunkey River system, Virginia. M.S. Thesis, Virginia Commonwealth University, Richmond, VA 105pp.</p> <p>Stephenson, Phillip H. 1991. Brook Floater in Virginia's Endangered Species: Proceedings of a Symposium. K. Terwilliger ed. The McDonald and Woodward Publishing Company, Blacksburg, Virginia.</p> <p>The Nature Conservancy. 1996. Biological and Conservation Data System. Arlington, Virginia, USA.</p> <p>Williams, J.D., M.L. Warren, Jr., K.S. Cummings, J.L. Harris, and R.J. Neves. 1993. Conservation status of freshwater mussels of the United States and Canada. Fisheries 18: 6-9.</p>
<p>Pamela J. Sheets (February 24, 2009)</p>	<p>February 24, 2009</p> <p>Superintendent Diann Jacox Cedar Creek and Belle Grove National Historical Park PO Box 700 Middletown, VA 22645</p> <p>Dear Superintendent Jacox:</p> <p>I am writing on behalf of Shenandoah County Parks and Recreation in support of Alternative D of the General Management Plan (GMP) for the Cedar Creek and Belle Grove National Historical Park.</p> <p>As the Director of a Key Partner organization, I am very pleased to support Alternative D of the GMP. I can strongly support this alternative as it meshes well with the overall Master Plan for the Keister Tract, which is the Shenandoah County-owned property within the park's boundaries. I truly support the partnership park concept and believe that the Key Partners will be able to develop a cohesive and wonderful park for the future park visitor.</p> <p>It is my intent to develop the Keister Tract under the current Master Plan and with clear regard to the plans of Alternative D of the GMP.</p> <p>I look forward to a continued partnership with the National Park Service and the other Key Partners as the development of this park continues and the park becomes a valuable resource to the Shenandoah Valley.</p> <p>Sincerely, Pamela J. Sheets, CPRP Director, Shenandoah County Parks & Recreation</p>

Table E.2 Comments Received on the NPS Planning, Environment and Public Comment (PEPC) Website

Commenter	Comment
<p>Private Citizen, Winchester, VA (February 25, 2009)</p>	<p>I am in support of the development of this park as a unit of the NPS. In regard to the draft plan put forth, I would like to see Alternative D fully implemented to ensure maximum usability of the park resources, as well as to provide greatest benefit to end users. I think this park is esp. well-suited to make use of bicycle and pedestrian modes of transportation, reducing the dependency of motorized vehicles by users.</p> <p>With the Northern Shenandoah Valley Regional Commission adoption of the "Walking and Wheeling the Northern Shenandoah Valley," this park would seem to be an excellent venue to allow some of those ideas to come to fruition and be implemented. With the slower than motorized traffic pace of bicycles, but also faster than pedestrian, this park would seem to be very well-suited to show the benefits of bicycle transportation especially.</p> <p>I am excited to see the development of the Park, and the cooperation put forth by the Key Partners in the project. Only through the formal establishment as an NPS park, will this land, buildings, and cultural heritage be preserved moving forward. There continues to be pressure to develop the surrounding areas. US citizens tend to respect NPS lands more than other lands overseen by other governing entities. The Cedar Creek and Belle Grove National Historical Park area encompasses a large segment of what defines the area as unique; preservation of these elements are essential to maintain the regions identity.</p>
<p>Kate G. Wofford (January 27, 2009)</p>	<p>January 27, 2009</p> <p>Superintendent Diann Jacox Cedar Creek and Belle Grove NHP PO Box 700 Middletown, VA 22645</p> <p>RE: General Management Plan/Environmental Impact Statement Cedar Creek and Belle Grove National Historical Park</p> <p>Dear Superintendent Jacox,</p> <p>The Shenandoah Valley Network (SVN), a non-profit conservation organization, links community groups working on land protection, land use and transportation issues in seven northern Shenandoah Valley counties. These include Frederick, Warren and Shenandoah Counties, where the Cedar Creek and Belle Grove National Historical Park (the Park) is located.</p> <p>We wish to applaud the National Park Service and its Key Partners for the draft general management plan and environmental impact statement for the Park, now under review. In particular, we appreciate your leadership as Park Superintendent and the leadership of Planner Chris Stubbs.</p> <p>SVN strongly endorses Alternative Plan D, the preferred alternative, as a guide to managing the Park's future. The recommendation to develop a new visitor center, establish six key interpretative themes for Park visitors and assign clear responsibilities for visitor programs to the National Park Service (NPS) and the Park's Key Partners will greatly enhance the visitor experience.</p>

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Commenter	Comment
	<p>SVN also supports the emphasis in Alternative Plan D on creating written, shared strategies, with greater coordination among the Park and its Key Partners, to pursue the 10 management elements, ranging from land protection to the visitor experience. We believe this commitment to collaborative planning, decision-making and program development will provide greater efficiency and leverage of scarce financial and other resources and will heighten the protection of natural, historic and cultural resources.</p> <p>The Shenandoah Valley Network particularly supports the management "zones" in Alternative Plan D, which clearly reflect the distinct land uses and land protection goals within the Park. The Sensitive Resource Zone on Cedar Creek and the North Fork of the Shenandoah should provide much-needed education and protection for the rare, endangered and other plant and animal species in this zone, while the Large Events Zone should offer ample space for the historic reenactments that have made the Park nationally renowned. We appreciate the careful analysis of the different kinds of land protection and education efforts that will be needed for each zone.</p> <p>If we were to find a fault with the well-thought out draft management plan for the Cedar Creek and Belle Grove National Historical Park, it would be the lack of any clear steps to expand the Park boundaries to more accurately reflect the Cedar Creek Battlefield Core Area, as described in 1992 the NPS Study of Civil War Sites in the Shenandoah Valley of Virginia. As the management planning process moves forward, we encourage NPS to consider adding boundary expansion to Alternative D to protect the critical historic and natural resources that lie outside the boundaries of the Park. Consideration of expansion is particularly important in light of the ongoing threat of new limestone quarry pits.</p> <p>Again, however, we applaud the NPS's effort in developing the preferred alternative. The Shenandoah Valley Network believes that Alternative Plan D offers the kind of comprehensive vision and goals needed at this time. We believe the NPS should adopt Alternative Plan D to guide the future of the Park.</p> <p>Thank you for the opportunity to comment and for your consideration.</p> <p>Kate G. Wofford Executive Director, Shenandoah Valley Network P.O. Box 186 Luray, VA 22835 540-303-740</p>

Table E.3 Comments Received at the Draft GMP/EIS Public Meetings

Commenter	Comment
Barbara Adamson (Strasburg, January 28, 2009)	<p>Alternative D a good strong alternative. It will best insure that the property is protected, vital properties are acquired. Presence of NPS will do that and will better insure that topics other than the Civil War are covered, including the valley settlement and Native American history, and the value of the natural environment in the area and along the river and Cedar Creek. A strong presence of the NPS and vigorous comments from local citizens will be needed to minimize the effect of the expansion of I-81 may have on the park. Has heard that flyovers are being discussed at I-66 and I-81, which are really tall. There has to be another way. Must be another way to improve safety. Would like to see as a visitor center, the purchase of the HUPP mansion in Strasburg. Adaptive re-use of a historic building, she believes by both sides, would be marvelous. Strongly in favor it.</p>
Larry Allamong (Strasburg, January 28, 2009)	<p>What about horse trails? Roads are unimproved dirt. They should stay that way. Nice loop through river that goes back through. Plus some trails that went out and came back to these loops.</p>
Stan Hirshburg (Strasburg, January 28, 2009)	<p>Figure 3.2. 1864 land use. p 3-25. Belle Grove Manor House. Bell needs an "e".</p>
Joan Harding (Front Royal, January 29, 2009)	<p>Concern is that it is a conglomeration with autonomy among partners. We have seen demonstrated that when there are differences of opinion, it can get very ugly. No one being a moderator or providing oversight, even if on an as-needed basis. Reenactment was a poor experience for visitors. They were confused as to how to get from Belle Grove because of no directions, no shuttle provided by Cedar Creek Foundation. Parking was also restricted in Middletown. People from Belle Grove climbing multiple fences to get to Cedar Creek. Pettiness and ill-will came from Cedar Creek Foundation. Belle Grove's letter indicating that it was upset with the Foundation. Cedar Creek retaliated saying that visitors would be charged full price. [question of whether it came from one person]. Understands that Cedar Creek said "we don't care what Belle Grove thinks." What's the point? Possible answer is that Cedar Creek Foundation wanted to deprive Belle Grove from income. Mother has been a long-time docent of Belle Grove. Worked for a few months as Relief Manager for Belle Grove. Doesn't know Cedar Creek people per se, but would tell visitors that Belle Grove is not dealing exclusively with Civil War, and if visitor focus is Civil War, that person should go to Cedar Creek Foundation. Has a small catering company and has a small wagon. Did beer fest at Belle Grove. Did it because it was promised. Made no money. Very concerned. On board of architecture review in Front Royal. Concerned that there is no moderator or mediator who can effectively get consensus among the groups. Also concerned about outside influences.</p>
Catherine Pfeifer (Front Royal, January 29, 2009)	<p>County steward for Frederick and Warren County. Educates landowners about conservation easements and better models for development VCC. Supportive of preferred alternative.</p>



Heritage Preservation: a Gift to the Future

PO Box 537 • Middletown, VA 22645

**Resolution of Belle Grove Inc.
Board of Directors**

Cedar Creek and Belle Grove National Historical Park
February 25, 2009

WHEREAS, the Cedar Creek and Belle Grove National Historical Park was created by Congress in 2002 under Public Law 107-373 to preserve the significant historic and natural resources in the Belle Grove Plantation and Cedar Creek Battlefield areas; to interpret the history of the Shenandoah Valley; to work with partners, landowners and communities; and to serve as a focal point within the Shenandoah Valley Battlefields National Historic District; and

WHEREAS, Cedar Creek and Belle Grove National Historical Park contains nationally significant historic, natural, cultural, military, and scenic resources and inspiring settings of great natural beauty; and

WHEREAS, the National Park Service, the key partners, and the park community partners are charged with planning for and managing Cedar Creek and Belle Grove National Historical Park as a unit of the National Park System for the benefit and enjoyment of future generations; and

WHEREAS, Belle Grove, Inc. is a legislated Key Partner that manages Belle Grove Plantation on behalf of the National Trust for Historical Preservation, and owns and manages Bowman's Fort or Harmony Hall, both National Historic Landmarks within the Cedar Creek and Belle Grove National Historical Park; and

WHEREAS, partnership in the Cedar Creek and Belle Grove National Historical Park provides important technical assistance, coordination among partners, economic benefits, and supports Belle Grove Inc.'s ability to preserve, interpret and market these invaluable historic sites and to enhance visitor experience and service to the surrounding communities; and

WHEREAS, the National Park Service, the key partners, the park advisory commission, and other stakeholders have prepared the Draft General Management Plan that provides for the management of Cedar Creek and Belle Grove National Historical Park; and

WHEREAS, Alternative D in the Draft General Management Plan provides the highest degree of protection for the important resources within the park and the best opportunities for visitors to understand and enjoy these resources.

NOW, THEREFORE, BE IT RESOLVED, that the Belle Grove, Inc. Board of Directors, Middletown, Virginia, fully endorses and supports Alternative D in the Draft General Management Plan and urges the Secretary of Interior to approve and implement this alternative.

Philip S. Griffin II
President

Anne Buettner
Vice President

Wilborn Roberson
Treasurer

Barbara Reese
Secretary

David N. Carne
Assistant Treasurer

Jackie Bailey Labovitz
Assistant Secretary

James E. Nolan, Jr.
Board Member

Elizabeth McClung
Executive Director



Heritage Preservation: a Gift to the Future

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February 27, 2009

Ms. Diann Jacox
Superintendent
Cedar Creek & Belle Grove National Historical Park
National Park Service
P.O. Box 700
Middletown, VA 22645

Dear Ms. Jacox:

We are writing on behalf of the Board Members and staff of Belle Grove, Incorporated to comment on the draft General Management Plan for the Cedar Creek & Belle Grove National Historical Park, and to submit the attached resolution.

Belle Grove, Inc. manages Belle Grove Plantation on behalf of the National Trust for Historic Preservation, and owns and manages Harmony Hall; both sites are listed on the Virginia and National Registers of Historic Landmarks and both are located at the heart of the National Historical Park. Belle Grove, Inc. is a statutory Key Partner pursuant to Public Law 107-373, the Cedar Creek & Belle Grove National Historical Park Act of 2002. Executive director Elizabeth McClung, who assisted in drafting the park legislation, represents Belle Grove, Inc. on the Cedar Creek & Belle Grove National Historical Park Advisory Commission.

Belle Grove Inc.'s mission is the stewardship and interpretation of these two authentic sites, which represent a continuum of Shenandoah Valley history from the time of initial settlement to the present, including the Civil War. The management of these architectural, archaeological and landscape resources serves as a model of historic preservation, and the ongoing preservation and interpretation of these sites is for the American public's benefit and inspiration. Belle Grove Plantation, which has been protected since 1964 by the National Trust for Historic Preservation today comprises 283 acres within the new National Park and Harmony Hall comprises 96.4 acres.



Because Belle Grove Inc.'s mission promotes the ongoing stewardship and interpretation of Belle Grove Plantation, Cedar Creek Battlefield, and Harmony Hall within the National Historical Park, both the authentic historic sites themselves and the remarkable, long span of history they represent, Belle Grove, Inc. strongly supports Alternative D to guide the future preservation and interpretation of the National Historical Park.

Alternative D places a high priority on the permanent protection of the Park's historic landscapes and individual resources as well as on the enhancement of the visitor's experience of the National Historical Park, plantation, battlefield, and national heritage area, which is completely compatible with Belle Grove, Inc.'s mission.

The management strategy outlined in Alternative D would provide the tools essential to properly protect the historic structures, authentic landscapes and battlefield, incomparable view sheds, and individual historic resources in and near the National Historical Park.

Pursuant to a formal land protection plan, the National Park Service, Key Partners, and other stakeholders would work together to protect the Park's historic landscapes and other invaluable historic resources through a coordinated program of educational and technical assistance, fee simple acquisition, conservation easements, and cooperative agreements with willing landowners.

Given the preservation challenges facing the National Historical Park, Alternative D is the appropriate management strategy to effectively preserve and protect the unique and irreplaceable historic landscape and resources which distinguish the Cedar Creek & Belle Grove National Historical Park.

Of particular importance to Belle Grove, Inc. is the interpretation of the full span of history represented within the National Historical Park boundaries, from pre-history through initial settlement, agricultural development, the Civil War and beyond. We support the comprehensive historical interpretation outlined in Alternative D, in which visitors would encounter not just one theme, but multiple ones, and that visitors to Cedar Creek & Belle Grove National Historical Park would perceive the Park as a cohesive unit of the National Park System. We also support the effort of a coordinated interpretive program to be developed and presented by the National Park Service, Key Partners, and other stakeholders.

In particular, Belle Grove, Inc. supports the concept in Alternative D of a central National Park Service visitor center, owned and operated by the National Park Service, with Key Partner-owned focal areas and visitor contact facilities, and an extensive hiking trail system which would connect the NPS visitor center, Key Partner properties, and other important destinations. Belle Grove Plantation would serve as a focal area and visitor contact facility. The National Park Service visitor center would be located within or near

the National Park, and would orient the visitor to the National Historical Park and, importantly, to the Shenandoah Valley Battlefields National Historic District. Belle Grove, Inc. endorses the site selection criteria for the visitor center enumerated in the draft General Management Plan at Section 2.8.6. As is the National Trust for Historic Preservation, Belle Grove, Inc. is particularly interested in fully exploring the opportunity to adaptively reuse an existing historic structure to serve as the National Park Service visitor center.

Belle Grove, Inc. strongly supports and wants to underscore the importance of the addition of full-time NPS staff to work at the park to properly accomplish its mission of administering the park, protecting park resources, managing the visitor center, maintaining NPS park land and facilities, and providing technical and interpretive media and program support. We also strongly support NPS's purchase of land from willing sellers within and near the CEBE National Park.

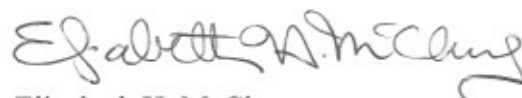
Belle Grove, Inc. is honored and privileged to be a founding, legislated Key Partner in the Cedar Creek and Belle Grove National Historical Park, and we reaffirm Belle Grove Inc's Board of Directors' and staff's commitment to the innovative partnership park concept which is the foundation of the Cedar Creek & Belle Grove National Historical Park.

With the invaluable support of the National Park Service, the "Cornerstones Organizations" -- Belle Grove, Inc., Shenandoah Valley Battlefields Foundation, Cedar Creek Battlefield Foundation, Shenandoah County, and the National Trust for Historic Preservation -- have made great progress to guide the creation of the National Historical Park. Together, we are the founders of the Park. However, the future well-being of the National Historical Park depends upon this established partnership and a new commitment to make management decisions together and based upon the General Management Plan, when it is adopted.

In closing, we want to acknowledge the invaluable assistance of Robert Nieweg, Southern Field Director of the National Trust for Historic Preservation, and of Frederick Andrae, the National Trust's representative on the Park's Advisory Commission. We also extend our deep appreciation to Superintendent Diann Jacox and Community Planner Chris Stubbs for the excellent work they are doing for the National Historical Park and the development of the draft General Management Plan. We look forward to working together with the National Park Service and our Key Partners to implement this General Management Plan.

Sincerely,


Philip S. Griffin II
President


Elizabeth H. McClung
Executive Director

COMMENTS SUBMITTED BY THE BOARD OF DIRECTORS OF
THE CEDAR CREEK BATTLEFIELD FOUNDATION
ON THE DRAFT GENERAL MANAGEMENT PLAN
CEDAR CREEK & BELLE GROVE NATIONAL HISTORICAL PARK

Pursuant to Section 9 of the Cedar Creek and Belle Grove National Historical Park Act, Public Law 107-373-107th Congress (December 12, 2002) (“the Act”), the Cedar Creek Battlefield Foundation (“the CCBF”) was designated as one of the “Key Partners” of the Park.

As a preface to the CCBF comments, the CCBF observes that the Act establishes and anticipates a cooperative working relationship among Partners, as well as the public, without any one entity or entities having the power to dictate the actions of a Partner or to require that Partner to act in a manner or manage its holdings in a way deemed by that Partner to be counter to the public interest and the Partner’s charter. The CCBF also welcomes the role of the Park Service as a resource and provider of consultation in accordance with the aims of the Act, but does not view the Act as supporting any actual or *de facto* NPS takings, by way of ownership or easement, from unwilling landholders or Partners.

With the above prefatory statements in mind, in general, the CCBF, agrees with many of the items in the Draft General Management Plan (“the Draft Plan”). However, in the CCBF’s view, several corrections and clarifications should be added or acknowledged prior to the implementation of the final Management Plan (“GMP”). Among the key recommended corrections and clarifications are:

Page 1-3 Land Protection

As is the case with the other Key Partners, the CCBF intends to continue its preservation activities via, *e.g.*, the purchase and ownership of land and facilities, as funds and properties become available. Therefore, it would not be accurate to indicate, as this Section of the Draft Plan may be interpreted, that the CCBF or other Partners would be required to contribute funds or resources to the NPS land and facilities acquisition efforts.

Page 1-10 – 1.5.6

The CCBF recommends adding “from willing sellers only” which is the language used in Public Law 107-373 Sec. 6 (a) concerning the acquisition of real property.

Page 1-35 Museum Collections

Custodianship of artifacts discovered on the CCBF’s “NPS administered land” shall be at the discretion of the CCBF.

This comment also highlights the understanding of the CCBF that its holdings, and those of the other Key Partners, are not administered by the NPS, but are rather within the Park partnership and stewarded by their respective owners.

Page 2-16 – 2.4 Figure 2.1

The CCBF has dedicated many years to, and is sensitive to, preservation goals. However, the CCBF has voiced its objection to the NPS’ current approach to designating Sensitive Resource Zones, as evidenced by the NPS’ proposed designation of the entire Panther Cave property, (135 acres along Cedar Creek), and the Meadowbrook Run as Sensitive Resource Zones. For example, it is unclear to the CCBF how the lines on the map were determined, the methodology or the specific bases for the designations, the nature and full categories of the subject resources of concern to the NPS and the actions or proscriptions that are intended to flow from a designation as a Sensitive Resource Zone. In essence, the CCBF does not view the Act as contemplating “takings” by the NPS through the process of line-drawing on maps. Therefore, as indicated in prior comments by the CCBF, the CCBF views NPS-formulated management zones as advisory in nature only and not enforceable by NPS.

The CCBF acknowledges that there may be certain areas on the above-referenced tracts of land that may contain resources that merit special consideration. However, this can only be determined after a proper survey is conducted to identify these resources and delineate appropriate areas and protective measures. The decision to close to the public certain areas identified as sensitive is, in the CCBF’s view, a very serious

decision, and any survey shall be considered by the CCBF with that principle in mind. The CCBF will look to the NPS for guidance, but the final decision on closing sensitive areas as referenced above shall be the CCBF's.

Page 2- 23 & 24 Table 2.4 "Area Specific Desired Conditions"

The CCBF plans to continue the long-standing agricultural use of the Heater House fields by pasturing cattle on the property for the foreseeable future as, based on the many years of CCBF's experience and stewardship of the property, such activities are not viewed as deleterious but, rather, beneficial. The CCBF views the Area Specific Desired Conditions described in Table 2.4 as NPS' non-binding opinion. It is also a current goal of the CCBF to also reconstruct the springhouse adjacent to the Heater House once funding is secured. This springhouse is an historic structure that, along with the agricultural use of the property, evidences and re-enforces the traditions of the Valley area.

Pages 2-25 through 2-31

The CCBF recommends that all the items in Alternative B be incorporated in Alternative D.

Pages 2-33 through 2-34; 2-38 & 2-40 Land Protection

The identification of properties to be preserved shall be a collaborative effort by the Key Partners and the NPS, however, each of the Key Partners will continue to own land and operate separately as specified in Public Law 107-373-107th Congress; thus securing funding for the NPS need not be a collaborative effort and have not been viewed by the CCBF as a feature of the Act. Rather, the CCBF believes that the NPS involvement in the area was intended to be as a resource, providing assistance to, but not detracting from, the ongoing efforts of the Key Partners to serve the public interest.

The CCBF also recommends that the NPS include a statement in the Draft Plan as to how the NPS views and intends to accomplish its role, as provided in the Act, of identifying areas outside of the Park boundaries that may be suitable for acquisition and preservation efforts.

The CCBF takes issue with the sentence on line 9:

“It is the responsibility of the NPS to determine what level of impact is acceptable and what actions are needed to keep impacts within acceptable limits”.

As stewards of the battlefield since 1988, the CCBF has comprehensive knowledge of its properties and is better qualified to determine impacts on the land. Moreover, Public Law 107-373-107th Congress, Sec. 13. (b), (1) (B) gives the CCBF the continued right to conduct reenactments and other events within the Park. Since the NPS has no experience in conducting reenactments, the CCBF is a better judge of the impacts on the land and community as it has hosted twenty large scale events that have helped preserve important resources and provide a rich educational and cultural resource for the area.

Throughout the draft GMP, the reenactments provided by the CCBF are characterized as a negative activity rather than a unique, exciting educational and cultural opportunities for the public. The NPS’ approach is puzzling and contrary to the approach in the Act, which specifically acknowledges the value of the CCBF’s activities. Therefore, CCBF takes exception to the following statement in the last paragraph – line 9:

“There is an expectation that the demand for new and larger special events may occur, making it imperative that the partners collaborate on evaluating the appropriateness of future special events for the park and identifying measures needed to sustain park resources and provide an authentic visitor experience.”

Nowhere in the Legislation that created the Cedar Creek and Belle Grove National Historical Park does it say that other Key Partners have the right to evaluate the appropriateness of another’s event. Again, as in the above comments on management zones, the CCBF does not view the Act as empowering the NPS to engage in actual or *de facto* takings of

land or easements from unwilling sellers, whether they be Key Partners or private landholders.

The Heater House fields are used throughout most of the year for pasturing cattle – just as they were in 1864 – and there has been no indication or identification of any deleterious effects. The supposed impact of cavalry on soil compaction, erosion, tree damage, and introduction of exotic weeds during any reenactment or reenactments is wholly speculative and, in the view of the CCBF, evidence of a misplaced and unsubstantiated focus in the Plan.

Page 2-52 Table 2-5

The enabling Legislation does not limit the number of times a Key Partner may host an event nor the number of participants involved. The CCBF shall be the deciding entity on the number of events and participants it hosts. The CCBF rules and regulations for reenactments states that digging fire pits on the battlefield is prohibited. Fires are used for cooking purposes only. Hopefully, as the Plan and NPS presence in the area evolves, additional correct information will be obtained to inform public statements.

Page 3-64

The CCBF has operated the Cedar Creek Visitor Center on the Valley Pike and has carried the name “*Cedar Creek Battlefield Visitor Center*” in all advertising, signage, website, brochures, and literature since 1996. In the draft GMP, our name has been changed to “the Cedar Creek Contact Facility” or “Visitor Contact Station”. Members of the CCBF acknowledge that the NPS may be concerned about avoiding public confusion if multiple visitor centers in the Park are all incorrectly perceived by the public as NPS centers or centers operated by one of the Key Partners. However, the CCBF does not believe that use of the term “contact facility,” which may be considered diminutive as compared to “visitor center” is the appropriate solution to the NPS’ concerns. Rather, the CCBF believes that the name of our facility, which has been operated for over a decade, should remain the same as it is distinctive and distinct from any NPS undertaking. However, the CCBF is willing to confer with the

NPS on this issue, but does not view itself as subject to unilateral decisions by the NPS on this matter.

The CCBF mission statement of 1988 is as follows:

“To acquire and preserve the land upon which the Battle of Cedar Creek was fought in the American Civil War in October 1864; to preserve writings which relate to the history of that battle; to discover, procure and preserve physical objects which relate to the history of that battle; and to develop an appropriate Battlefield Historical Center consistent with the present open character of the land adjacent to Belle Grove Plantation.”

To clarify and add to the above comments, the CCBF center does not seek to be the official visitor center for the entire Cedar Creek and Belle Grove National Historical Park, but does intend to be the primary focal point for travelers interested in the Battle of Cedar Creek areas within the CCBF holdings, the interpretation, and housing of artifacts and documents specific to the Battle of Cedar Creek and the historic Heater House.

The CCBF does keep daily visitor count and requests that the inaccurate statement in the draft GMP be corrected.

Friends Group

The CCBF does not object to the creation of a NPS Friends Group. However, the activities of the Friends Group must be made clear to the public concerning, for example, sponsorship of events, political or historical viewpoints and the raising and disposition of funds. For example, the public should not be misled into supposing that the activities of the NPS Friends Group are necessarily endorsed by, support the activities of or directly benefit the Key Partners. For example, the public should not be misled into supposing that contributions to an NPS Friends Group also fund the activities of any of the Key Partners.

Signed this 23rd day of February, 2009

Stanley M. Hirschberg, MD.

**Stanley M. Hirschberg, MD, President
On behalf of the 2009 Board of Directors
Cedar Creek Battlefield Foundation**

CIVIL WAR PRESERVATION TRUST

Saving America's Civil War Battlefields

Theodore Sedgwick
Chairman

James Lighthizer
President

February 27, 2009

Superintendent Diann Jacox
Cedar Creek and Belle Grove NHP
P.O. Box 700
Middletown, VA 22645

Dear Superintendent Jacox:

I am writing on behalf of the Civil War Preservation Trust (CWPT), a 60,000-member national nonprofit battlefield preservation organization. Our mission is to protect our nation's endangered Civil War sites and promote appreciation of these hallowed grounds through education and heritage tourism. CWPT has helped protect more than 25,000 acres of battlefield land in the United States, including 470 acres of battlefield land at Cedar Creek.

The purpose of this letter is for CWPT to submit comments on the Draft General Management Plan (GMP) presented by Cedar Creek and Belle Grove National Historical Park (NHP) for public review. CWPT fully supports Alternative D as presented in the Draft GMP and strongly encourages the National Park Service (NPS) to adopt it as the preferred alternative. CWPT particularly supports the focus on battlefield land protection and the proposal for a future visitor center as laid out in Alternative D.

The battle of Cedar Creek was determined to be one of the most historically significant battlegrounds in the nation by a blue ribbon panel created by Congress in 1990. In an exhaustive 1993 report, the Civil War Sites Advisory Commission (CWSAC) identified Cedar Creek as a Priority I, Class A site, its highest designation. Further, the 1992 Study of Civil War Sites in the Shenandoah Valley of Virginia conducted by NPS also identified Cedar Creek as historically significant and described the threats facing it in detail. This study paid particular attention to threats facing the "core battlefield," which witnessed the most intense fighting and is the most important land for preservation.

CWPT fully supports the land protection goals detailed in Alternative D, which recognizes the importance of historic and cultural landscapes and rightly calls for the protection of additional land that contributes to these landscapes. To tell the full story of the Cedar Creek and Belle Grove NHP, CWPT is particularly interested in the protection of battlefield land and historic viewsheds associated with the park. Alternative D also calls for funding for land acquisition, creating the financial resources necessary to protect the historic landscape in perpetuity by purchasing land directly from willing sellers.

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CWPT Draft GMP Public Comments

February 27, 2009

Page 2

In addition to land protection within NPS boundaries, CWPT would also stress the importance of preserving historically significant battlefield land outside the park boundary. Although great care was taken when the limits of the park were set in 2002, some important parcels identified by the CWSAC study as historically significant could not be included at that time. History does not stop at the NPS boundary, and we would like to ensure that proper consideration is given to historic properties that fall outside that delineation as they become available for purchase. CWPT, working with its preservation partners in Frederick County, is committed to helping the park acquire these properties from willing sellers at market value.

Among the significant lands left outside the park boundary are properties associated with the adjacent O-N Minerals limestone quarry, now owned by Carneuse Lime and Stone. It is important to note the quarry lands were omitted from the boundary, despite its historic significance, at the request of O-N Minerals. Later, when this property was being considered for a rezoning by the Frederick County Board of Supervisors, O-N and Carneuse used the omission they requested to claim the lands were not historically significant — questionable logic, to say the least.

CWPT believes it would be valuable for the park to undertake a future boundary study further examining historic properties outside the initial park boundary. CWPT would also encourage NPS and its park partners to work with local government to create a buffer or transition zone at Cedar Creek and Belle Grove NHP so that encroaching development does not immediately abut NPS land.

The second point of emphasis that distinguishes Alternative D from the other proposals is the call for a central visitor center. An NPS-operated visitor center is extremely important to addressing the seven interpretive themes illustrated by the park and its holdings. As one of the park system's newer sites, Cedar Creek and Belle Grove NHP is ideally positioned to serve as an interpretive model by incorporating numerous historical threads into a cohesive visitor experience. Such a successful model would, if implemented, be adapted and followed by other NPS units.

Moreover, a visitor center operated by NPS would provide orientation within the larger Shenandoah Valley Battlefields National Historic District, which includes eight counties and 15 Civil War battlefields. An NPS-operated visitor center would be best-equipped to tell the greater story of how Cedar Creek fits into the overall Historic District. The nature of the partnerships that sustain Cedar Creek and Belle Grove NHP has set important precedents and CWPT believes that the creation of an NPS-operated visitor center would further improve upon this framework.

Finally, CWPT would like to address the Cumulative Impact Analysis discussed in Chapter 4, which further underscores the importance of land protection and the value of meaningful park boundaries. The cumulative impacts addressed in the Draft GMP focus on the potential widening of Interstate 81, the imminent expansion of the limestone quarry and the threats posed by encroaching residential and commercial development. These are very real threats to the

CWPT Draft GMP Public Comments

February 27, 2009

Page 3

future success of the park, and the land protection vision outlined in Alternative D is best equipped to deal with the threats by protecting endangered landscapes before they are lost to development or impacted by future roads and highways.

In conclusion, CWPT appreciates the opportunity to comment on the Draft General Management Plan for Cedar Creek and Belle Grove NHP and would like to reiterate its support for Alternative D, which provides the best opportunity for the future success of the park. CWPT looks forward to working alongside the National Park Service in implementing the vision outlined in Alternative D.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Lighthizer', with a stylized flourish at the end.

James Lighthizer, President



dlb windcrest
<dlb.windcrest@gmail.com>
02/03/2009 10:52 AM

To diann_jacox@nps.gov
cc
bcc
Subject Comment

History: This message has been replied to.

Superintendent Jacox-

I am a resident of the Park living on Bowmans Mill Rd. I apologise for not being able to make the Middletown public meeting, however, I'm out of town the night of the 4th. I compliment you and the staff for the draft general management plan that I have reviewed. I'm basically in agreement with your recommendations. I think that alternative D is going in the right direction. It would certainly show a real commitment on the part of the key partners and begin to pull all parties together from the get-go.

My concerns are twofold, namely, leadership and maneuverability. For the Park to be a real success over the long term, there has to be a central authority which manages and facilitates decision making. I'm not convinced that the partnership will stand the test of time because of particular issues that impact a selected partner at the expense of the whole Park mission. It will be very easy for the partners to have conflicts which could impede overall progress. I would like to see a structure that has a bit more centralization.

My second concern surrounds your decision point 4, getting around the Park. As a resident of the park, I would like to see improved access and a network of trails and roads that provide a coordinated and effective understanding of the Park. However, please don't jump the gun on this issue. The current road structure in much of the park can not maintain even minimal traffic flow. It would be extremely dangerous to encourage visitation throughout the Park prior to an assessment and corrective action being performed. We don't need any accidents in the park.

I think it would be very prudent to ensure excellent relationship with the local museums. The Museum of the Shenandoah Valley and other groups could be of real assistance in the future.

Thank you for keeping the communications channels open and I wish you great success as you move this venture forward.

Regards,

David Blount



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

February 26, 2009

Diann Jacox, Superintendent
Cedar Creek and Belle Grove NHP
P. O. Box 700
Middletown, VA 22645

Subject: Draft General Management Plan/Environmental Impact Statement Cedar Creek and Belle Grove National Historical Park Frederick, Shenandoah, Warren Counties, Virginia November 2008 CEQ # 20080474

Dear Ms. Jacox:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the United States Environmental Protection Agency (EPA) has reviewed the subject document. The National Park Service (NPS) and its partners are responsible for managing Cedar Creek and Belle Grove National Historic Park (NHP) to conserve its scenery, natural and historic resources, and wildlife, and to provide for its enjoyment in a manner that will leave the park unimpaired for the enjoyment of future generations. In 2002, Congress adopted enabling legislation creating Cedar Creek and Belle Grove NHP as a "partnership" park unit of the national park system.

The purpose of the Draft Environmental Impact Statement (DEIS) is to implement a programmatic management framework for the park. This general management plan will guide decision making at the park for the next 15 to 20 years. Four alternatives are considered in this DEIS. The alternatives describe varying degrees of coordination and involvement by the NPS and Key Partners. Alternative D is the preferred alternative. It includes an NPS-managed visitor center and focal areas owned and managed by the NPS and Key Partners. It also includes a formal agreement between the NPS and Key Partners. Visitors would access the park via several auto-touring routes and a system of non-motorized trails.

Based on our review, this DEIS is rated "LO" (Lack of Objections). A description of our rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

During any construction activities, impacts to resources should be avoided and minimized. In addition, activities under this action should comply with all appropriate state and federal guidelines, regulations, and executive orders (including Invasive Species, Green



Buildings, Low Impact Development, etc). An air quality analysis may be warranted if there is significant roadway construction.

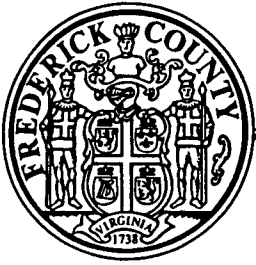
Thank you for the opportunity to offer these comments. If you have any questions, please contact me at (215) 814-3330.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara Okorn".

Barbara Okorn
Office of Environmental Programs





COUNTY of FREDERICK

John R. Riley, Jr.
County Administrator

540/665-5666

Fax 540/667-0370

E-mail:

jriley@co.frederick.va.us

February 26, 2009

Chris J. Stubbs
Community Planner
Cedar Creek and Belle Grove National
Historical Park
P. O. Box 700
Middletown, VA 22645

Dear Mr. Stubbs:

The Frederick County Board of Supervisors, meeting in regular session on February 25, 2009, approved the Resolution of Support for Alternative "D" as described in the Draft General Management Plan for Cedar Creek and Belle Grove National Historical Park as requested. The resolution is enclosed.

With kindest regards, I am

Sincerely,

John R. Riley, Jr.
County Administrator

JRR/tjp

Enclosure

cc: Kris C. Tierney, Assistant County Administrator

C:\TJP\miscletters\StubbChris(CedarCreek&BelleGroveNationalPark)022509BdMtg.docx

Resolution of Support for Alternative "D" as described in the
Draft General Management Plan for
Cedar Creek and Belle Grove National Historical Park
February 25, 2009

WHEREAS, Cedar Creek and Belle Grove National Historical Park was created by Congress in 2002 under Public Law 107-373 to preserve the historic and natural resources in the Cedar Creek Battlefield and Belle Grove Plantation areas; to interpret the history of the Shenandoah Valley; to work with partners, landowners and communities; and to serve as a focal point within the Shenandoah Valley Battlefields National Historic District; and

WHEREAS, Cedar Creek and Belle Grove National Historical Park contains nationally significant historic, natural, cultural, military, and scenic resources and inspiring settings of great natural beauty; and

WHEREAS, the National Park Service, the key partners, and the park community partners are charged with planning for and managing Cedar Creek and Belle Grove National Historical Park as a unit of the National Park System for the benefit and enjoyment of future generations; and

WHEREAS, a significant portion of the Cedar Creek and Belle Grove National Historical Park lies within Frederick County, Virginia; and

WHEREAS, visitors to Cedar Creek and Belle Grove National Historical Park provide important economic benefits to Frederick County and the other surrounding communities; and

WHEREAS, the National Park Service, the key partners, the park advisory commission, and other stakeholders have prepared the Draft General Management Plan that provides for the management of Cedar Creek and Belle Grove National Historical Park; and

WHEREAS, Alternative D in the Draft General Management Plan provides the highest degree of protection for the important resources within the park and the best opportunities for visitors to understand and enjoy these resources.

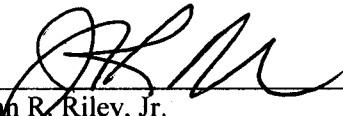
NOW, THEREFORE, BE IS RESOLVED, that the Board of Supervisors of Frederick County, Virginia, endorses and supports Alternative D in the Draft General Management Plan and urges the Secretary of Interior to approve and implement this alternative.

ADOPTED this 25th day of February, 2009.

VOTE:

Richard C. Shickle	<u>Aye</u>
Gary W. Dove	<u>Aye</u>
Gene E. Fisher	<u>Aye</u>
Philip A. Lemieux	<u> </u>

Gary A. Lofton	<u>Aye</u>
Bill M. Ewing	<u>Aye</u>
Charles S. DeHaven, Jr.	<u>Aye</u>



John R. Riley, Jr.
Frederick County Administrator

**TOWN OF MIDDLETOWN
RESOLUTION FOR CEDAR CREEK
AND BELLE GROVE NATIONAL HISTORICAL PARK**

WHEREAS, Cedar Creek and Belle Grove National Historical Park was created by Congress in 2002 under Public Law 107-373 to preserve the historic and natural resources in the Cedar Creek Battlefield and Belle Grove Plantation areas; to interpret the history of the Shenandoah Valley; to work with partners, landowners and communities; and to serve as a focal point within the Shenandoah Valley Battlefields National Historic District; and

WHEREAS, Cedar Creek and Belle Grove National Historical Park contains nationally significant historic, natural, cultural, military, and scenic resources and inspiring settings of great natural beauty; and

WHEREAS, the National Park Service, the key partners, and the park community partners are charged with planning for and managing Cedar Creek and Belle Grove National Historical Park as a unit of the National Park System for the benefit and enjoyment of future generations; and

WHEREAS, the town of Middletown, Virginia, has been designated by the Virginia House of Delegates as the official gateway to Cedar Creek and Belle Grove National Historical Park; and

WHEREAS, visitors to Cedar Creek and Belle Grove National Historical Park provide important economic benefits to Middletown and the other surrounding communities; and

WHEREAS, the National Park Service, the key partners, the park advisory commission, and other stakeholders have prepared the Draft General Management Plan that provides for the management of Cedar Creek and Belle Grove National Historical Park; and

WHEREAS, Alternative D in the Draft General Management Plan provides the highest degree of protection for the important resources within the park and the best opportunities for visitors to understand and enjoy these resources.

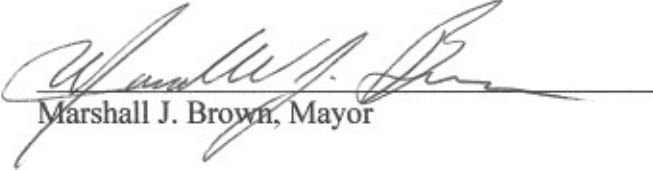
NOW, THEREFORE, BE IT RESOLVED by the Mayor and Common Council for the Town of Middletown, Virginia, that the members of this body endorse and support Alternative D in the Draft General Management Plan and urge the Secretary of Interior to approve and implement this alternative.

Adopted this 9th day of February, 2009.

ATTEST:



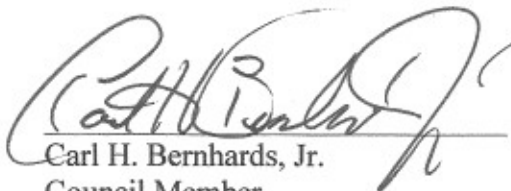
Donna M. Gum, Municipal Clerk

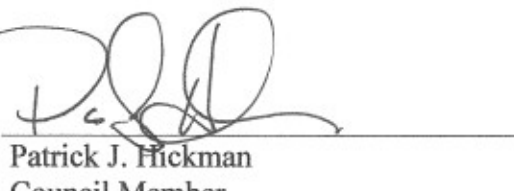


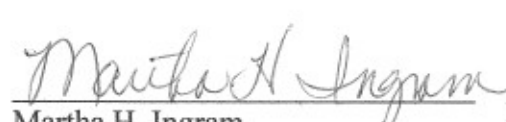
Marshall J. Brown, Mayor

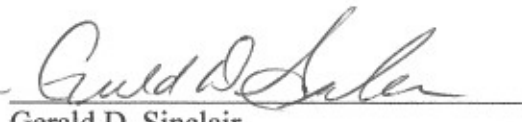
PAGE TWO

TOWN OF MIDDLETOWN
RESOLUTION FOR CEDAR CREEK
AND BELLE GROVE NATIONAL HISTORICAL PARK

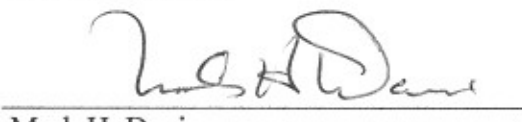

Carl H. Bernhards, Jr.
Council Member


Patrick J. Hickman
Council Member


Martha H. Ingram
Council Member


Gerald D. Sinclair
Council Member


John K. Owings
Council Member


Mark H. Davis
Council Member



Please share with us any comments you have on the Draft Cedar Creek and Belle Grove National Historical Park General Management Plan/Environmental Impact Statement.

I Am very much in favor of the establishment and expansion of the Belle Grove, Cedar Creek National Historic Park. The draft management plan goes into great detail as to the several reasons as to how the plan could be implemented. Although I am a board-member of the Cedar Creek Battlefield Foundation, which as a body has expressed reservations to Option D, I individually support option D as the most Comprehensive and long Range Option but with the following comments.

I believe that pastured livestock should be continued as a use within certain sections of the park and that trails which permit horse back riding be considered. I would also recommend that the US Park Service become more influential on land use decisions adjacent to the park or within its viewshed and that land acquisition become a high priority once the parks management plan is adopted.

Thank you for taking the time to comment on the Draft Cedar Creek and Belle Grove National Historical Park General Management Plan/EIS. The comment period closes on February 27, 2009. Please have your comments to us by that time.

You may also comment on the Draft GMP/EIS on the park's planning web site at <http://parkplanning.nps.gov/cebe>.

Date: 2/22/09 Printed Name: Michael K. Kehoe
Mailing Address: 117 Dower Ln. Strasburg, Va
Phone: 540 465 4185 E-Mail Address: mikehoe@yahoo.com



Please check this box if you would like to be added to the GMP mailing list.

**NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION®**

Richard Moe
PRESIDENT

February 27, 2009

Mr. Dennis Reidenbach
Regional Director, Northeast Region
National Park Service
c/o Cedar Creek & Belle Grove National Historical Park
P.O. Box 700
Middletown, VA 22645

Dear Dennis:

I am writing on behalf of the National Trust for Historic Preservation to comment on the draft General Management Plan for the Cedar Creek & Belle Grove National Historical Park.

Since 1964 the National Trust for Historic Preservation has owned and preserved Belle Grove Plantation, a 283-acre National Historic Landmark property at the heart of the National Historical Park. We are a statutory "Key Partner" pursuant to Public Law 107-373, the Cedar Creek & Belle Grove National Historical Park Act of 2002. With our valued partner Belle Grove Inc. and their stalwart director Elizabeth McClung, the National Trust preserves and interprets Belle Grove Plantation for the American public's benefit and inspiration. The National Trust is very ably represented by Fred Andrae on the Cedar Creek & Belle Grove National Historical Park Advisory Commission.

The National Trust is dedicated to promoting careful stewardship of Belle Grove Plantation, Cedar Creek Battlefield, and the National Historical Park. Consequently, the National Trust strongly supports Alternative D to guide the future preservation and interpretation of the National Historical Park, because Alternative D places a high priority on the permanent protection of the Park's historic landscapes and individual resources as well as on the enhancement of the visitor's experience of the National Historical Park, plantation, battlefield, and national heritage area.

Protection of Historic Landscapes and Resources:

The management strategy outlined in Alternative D would provide the tools essential to properly protect the historic landscapes, battlefield, viewsheds, and individual historic resources in and near the National Historical Park.

Pursuant to a formal land protection plan, the National Park Service, Key Partners, and other stakeholders would work together to protect the Park's historic landscapes and other invaluable historic resources through a coordinated program of educational and technical assistance, fee simple acquisition, conservation easements, and cooperative agreements with willing landowners.

Given the preservation challenges facing the National Historical Park, Alternative D is the appropriate management strategy to effectively preserve and protect the unique and irreplaceable historic landscape and resources which distinguish the Cedar Creek & Belle Grove National Historical Park.

Enhancement of the Visitor's Experience of the National Historical Park:

The National Trust shares the vision, outlined in Alternative D, in which visitors to Cedar Creek & Belle Grove National Historical Park would perceive the Park as a cohesive unit of the National Park System and would learn the full range of the stories associated with the Park through a coordinated interpretive program to be developed and presented by the National Park Service, Key Partners, and other stakeholders.

In particular, the National Trust supports the concept in Alternative D of a central National Park Service visitor center, Key Partner-owned focal areas and visitor contact facilities, and an extensive hiking trail system which would connect the visitor center, Key Partner properties, and other important destinations. Belle Grove Plantation would serve as a focal area and visitor contact facility. The National Park Service visitor center would be located within or near the National Park, and would orient the visitor to the National Historical Park and, importantly, to the Shenandoah Valley Battlefields National Historic District.

The National Trust endorses the site selection criteria for the visitor center enumerated in the draft General Management Plan at Section 2.8.6. We are particularly interested in fully exploring the opportunity to adaptively reuse an existing historic structure to serve as the National Park Service visitor center.

National Trust Commitment to the Partnership Park:

Finally, I want to reaffirm the National Trust's commitment to the innovative partnership park concept which is the foundation of the Cedar Creek & Belle Grove National Historical Park.

With the invaluable support of the National Park Service, the "Cornerstones Organizations" -- Belle Grove, Inc., Shenandoah Valley Battlefields Foundation,

Mr. Dennis Reidenbach

February 27, 2009

Page 3

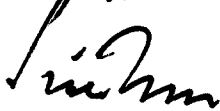
Cedar Creek Battlefield Foundation, Shenandoah County, and the National Trust for Historic Preservation -- have made great progress to guide the creation of the National Historical Park. Together, we are the founders of the Park. However, the future well-being of the National Historical Park depends upon this established partnership and a new commitment to make management decisions together and based upon the General Management Plan, when it is adopted.

In closing, I want to express my personal appreciation to Superintendent Diann Jacox and Community Planner Chris Stubbs for the inspired work they have done for the National Historical Park and to lead the development of the draft General Management Plan. Many people have contributed to this excellent document, but Diann and Chris merit special recognition for a job well done.

We look forward to working together with the National Park Service and our Key Partners to implement this General Management Plan.

With warm regards.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Moe", written over the word "Sincerely,".

Richard Moe

RM/rln

cc: Phil Griffin, President, Belle Grove, Inc.



National Parks Conservation Association®

Protecting Our National Parks for Future Generations®

February 26, 2009

Superintendent Diann Jacox
Cedar Creek and Belle Grove NHP
P.O. Box 700
Middletown, VA 22645

Re: Cedar Creek & Belle Grove National Historic Park Draft General Management Plan

Dear Superintendent Jacox:

On behalf of the National Parks Conservation Association (NPCA), I am pleased to offer comments on the November 2008 Draft General Management Plan (GMP). In more than 85 years, NPCA has grown to represent 340,000 members through our national headquarters and 24 regional and field offices, all working to "protect and enhance America's National Park System for present and future generations." NPCA actively encouraged the creation of Cedar Creek & Belle Grove National Historic Park (CEBE) and applauds Congress and the National Park Service (NPS) for the accomplishments toward realizing the full potential and contribution of one of America's most recent national park units – for the benefit of the region and the nation.

STRONGLY ENDORSE PREFERRED ALTERNATIVE D

NPCA strongly and enthusiastically endorses the Alternative D as described in the GMP. The analysis provided of the other options demonstrates the importance of moving ahead with the steps and goals articulated.

- The protection of the parks natural and cultural resources will be most responsibly undertaken with the Alternative D tools and strategy. The past few years have demonstrated the significant challenges that all partners face in long term protection of the park's resources against multiple serious threats as the area faces significant growth and industrial pressures.
- CEBE offers an opportunity to develop an exceptional interpretation and education program. With a unique partnership park it is critical to take the approach described in Alternative D in order to achieve this level of quality.
- Visitor services and the ability to offer the most experience for future visitors will be significantly improved under Alternative D.
- The management of this partnership park will present many challenges to take full advantage of the key partners, as well as maximize the use of assistance from outside sources. Alternative D describes the most workable management structure and will allow successful long term cooperation and park protection.
- Extensive technical assistance is facilitated under Alternative D and we believe will be critical to strengthening the relationship among the key partners and achieving long term goals for mutual benefit.

VIRGINIA OFFICE 7 EAST WASHINGTON STREET, 3RD FLOOR LEXINGTON, VIRGINIA 24450
540.463.3800

National Headquarters 1300 19th Street, N.W., #300 Washington, D.C. 20036
www.npca.org

IMPORTANCE OF PARTNERSHIP PARKS

Increasingly, the National Park Service is exploring creative and more effective park management models. In many places around the country – as demonstrated by CEBE – partnering with other agencies, organizations and landowners is the best solution. The future success of CEBE we believe can serve as an outstanding example of the partnership park approach.

MANAGEMENT ZONES ARE KEY

A particularly strong feature of the Draft GMP is the definition of the Management Zones. These zones must be clearly understood and responsibly and consistently enforced in the future. There is likely to be pressure, driven by short term perspective, to modify these management zones and it will be important to manage and make decisions that will protect the integrity of the zone concept and definitions.

BOUNDARIES – NEED FOR EARLY, COMPREHENSIVE STUDY

The GMP defers the issue of the appropriate boundaries for CEBE to a future study. While this is understandable given the challenge of such a multi-faceted planning process, it is important that a study of the boundary be conducted in the near future. Public understanding and support will be strengthened by a full boundary study with strong public participation.

NEED FOR ADEQUATE BUDGET

CEBE will only fulfill its legislative mandate with adequate staffing, initial investment and long term operating budget. The budget figures provided in Alternative D seem to be a bare minimum that will be needed for this park unit to achieve the mission set by Congress, but represent a responsible estimation for implementing this GMP.

EXTERNAL THREATS

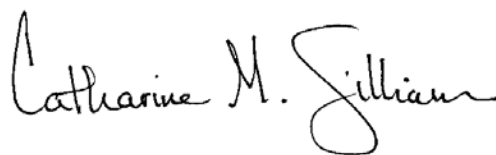
Cedar Creek & Belle Grove has already faced external threats that heighten the challenge of protecting this park. The proposed expansion of the adjacent mining operation and the widening of Interstate-81 are the two most prominent examples. It will be important to enforce the protection provisions – especially for other federal agencies – fully in the short and long term.

ENGAGING MANY PARTNERS AND TAPPING DIVERSE RESOURCES

There is understandable emphasis in the Draft GMP on Key Partners and Community Partners. The draft underemphasizes the contributions that can – and should – be made by a much broader group of potential partners. These will be found both in a larger definition of geographic reach and in a more creative exploration of the types of partners and the tools – financial, legal, educational, etc. – that can be utilized in managing and providing support for the park.

Thank you for the opportunity to comment. NPCA appreciates the careful and thorough work demonstrated in the development of this draft GMP and the process that has encouraged full public participation. We expect to continue to be enthusiastically build support for Cedar Creek & Belle Grove NHP and contributing to the public's engagement in the future.

Sincerely,

A handwritten signature in black ink that reads "Catharine M. Gilliam". The signature is fluid and cursive, with the first name being the most prominent.

Catharine M. Gilliam
Virginia Program Manager

Diann Jacox, Superintendent
Cedar Creek and Belle Grove National Historical Park
P. O. Box 700
Middletown, Virginia 22645

February, 2009

Dear Superintendent Jacox,

The members of the Cedar Creek and Belle Grove National Historical Park Federal Advisory Commission and the entities we represent are honored to serve as advisors and co-creators, along with the National Park Service (NPS), of a new model partnership park. Provided below are the commission's general comments and recommendations on the park's general management plan.

Pursuant to Section 9 of the Cedar Creek and Belle Grove National Historical Park Act, Public Law 107-373-107th Congress, December 12, 2002, the Cedar Creek and Belle Grove National Historical Park Federal Advisory Commission was formed and, through the participation and review process, provided advice and comment on the process that resulted in the National Park Service proposed General Management Plan and Environmental Impact Statement for Cedar Creek and Belle Grove National Historical Park. The commission views the act as creating and providing the framework for a unique, cooperative arrangement among the NPS, the key partners, the Commonwealth of Virginia, the Virginia counties of Frederick, Shenandoah, and Warren, landowner representatives, the Virginia towns of Middletown and Strasburg, and the United States Forest Service. The Commission also acknowledges the roles and stewardship of the organizations that have contributed to the identification, preservation and management of the historical, cultural and natural resources within the Cedar Creek and Belle Grove National Historical Park.

I. Consideration of Proposed Alternatives for National Park Management Responsibilities and Role

Four basic alternatives were considered with regard to the potential responsibilities and role of the NPS in the Cedar Creek and Belle Grove National Historical Park (CEBE). These alternatives are summarized in the introduction to the plan, and are described in detail in chapter 2 of the plan, pp. 2-1–2-68.

After careful review and consideration, the Commission unanimously recommends Alternative D, as it has, in the Commission's view, the greatest prospect of enhancing the educational, cultural, and environmental richness of the park, while also leaving flexibility to accommodate the needs of the public and the various organizations and constituencies represented by the members of the Commission. The CEBE general management plan, and particularly Alternative D, creates a viable framework within which the NPS and Key Partners may cooperate and consult on matters of mutual interest.

The following summarizes the commission's general views on the elements of Alternative D, with the comments being specifically directed to the summary provided in table 2.7, section 2.13 of the plan, pp. 2-59–2-66.

II. Partnerships

As set forth in alternative D, the commission supports a strong partnership between park partners, the NPS, landowners within the park, and public entities represented on the Federal Advisory Commission (FAC). The FAC recommends that the NPS and key partners, particularly, continue to meet regularly to cooperate in the overall management of the park and to provide advice to one another on an as-needed basis. The FAC recommends that key partners and others choose to enter into formal, written cooperative agreements with the NPS to shape the elements of their particular relationship.

III. Land Protection

The FAC supports the land protection aspect of Alternative D, and encourages the NPS to purchase land from willing sellers within or outside of the park boundaries. The Commission also recommends that key partners and others work together to develop a land protection plan focusing on cultural landscapes, sensitive natural resources, and connections between the NPS and key partners' properties. The FAC acknowledges that the key partners and others, in addition to the NPS, may acquire and independently hold land within the park or outside of the present boundaries of the park.

IV. Cultural and Natural Resources Management

The FAC as a whole, including each of the key partners, recognizes the cultural richness and value of the Shenandoah Valley region and is dedicated to protecting and managing cultural resources within the park using best practices outlined by the Secretary of the Interior. The FAC recommends that the NPS and CEBE staff work closely with key partners and landowners to: (a) acquire and preserve additional holdings that would complement and augment the present and future holdings of the NPS and the key partners; (b) assist key partners and local landowners with strategies to protect and manage significant cultural resources within and adjoining the park; and (c) enter into formal agreements with the key partners on cultural resource management. The FAC also supports the NPS's rehabilitation and use of the Whitham farm buildings and property.

The FAC recognizes the NPS expertise in natural resource management and encourages NPS staff to help develop strategies and provide advice for the protection and management of these resources.

V. Visitor Experience, Interpretation, and Education—Park Facilities— Transportation, Access and Circulation

The FAC strongly supports the creation of the Alternative D NPS visitor center for the park. The FAC also supports the mission of coordinating visitor orientation and circulation throughout the park, as well as its educational services, consultation, and management assistance. The FAC recommends that Alternative D's focus on creating an integrated interpretive plan, development of a trail system, and interpretive media to enhance visitor experience should be seen as an important coordination effort by the NPS staff.

VI. Park Operations

The Commission encourages the NPS to provide adequate staffing levels for CEBE.

VII. Technical Assistance – Related Resources

The FAC supports the concept of technical assistance as outlined in Alternative D, and views the NPS's ability to offer technical assistance as one of the core contributions of the NPS's presence within the park and the national historic district.

VIII. Potential Park Friends Group and NPS Fundraising Activities

The FAC supports the formation by the NPS of a Cedar Creek and Belle Grove National Historical Park friends group. The FAC recommends that any fundraising activities via a CEBE friends group be constituted and promoted so as not to cause confusion regarding the activities, needs and goals of the various Key Partners and other local charitable and public interest organizations.

IX. Management Zones

The FAC supports the concept of management zones as described in section 2.4 on page 2-16.

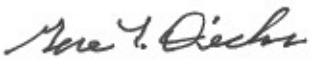
X. Signatures



Fred Andrae, National Trust for Historic Preservation



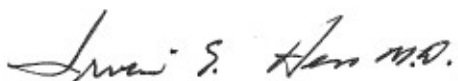
Mary Bowser, private landowner



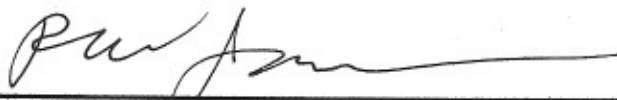
Gene Dicks, town of Middletown



Patrick Farris, Warren County



Irvin Hess, Shenandoah Valley Battlefields Foundation



Randolph Jones, Commonwealth of Virginia



Sarah Mauck, town of Strasburg



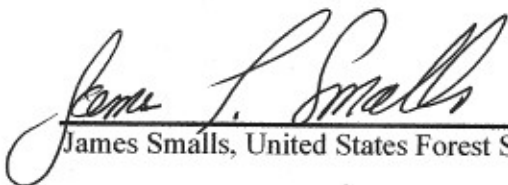
Elizabeth McClung, Belle Grove, Inc.



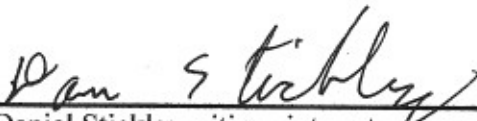
Gary Rinkerman, Cedar Creek Battlefield Foundation



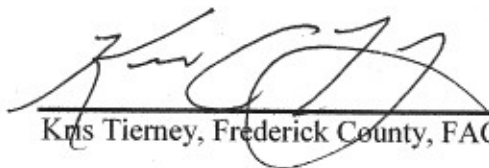
Pam Sheets, Shenandoah County



James Smalls, United States Forest Service



Daniel Stickley, citizen interest group



Kris Tierney, Frederick County, FAC chair



P.O. Box 2362
Winchester, VA 22604
info@preservefrederick.org
www.preservefrederick.org

February 25, 2009

Ms. Diann Jacox
Superintendent
Cedar Creek and Belle Grove National Historical Park
P. O. Box 700
Middletown, VA 22645

Re: Cedar Creek and Belle Grove National Historical Park General Management Plan

Dear Superintendent Jacox:

Preserve Frederick would like to express our deep appreciation to you, Chris and the GMP committee for the dedication of time, talent and detail put into the draft General Management Plan for the Cedar Creek and Belle Grove National Historical Park. We find it comprehensive and thoughtful. The efforts put into this plan will long benefit this community and Park as it develops into a national treasure for future generations to learn from and enjoy.

Preserve Frederick is a non-profit grassroots organization whose mission is to promote compatible development that strengthens our communities, protects our natural and historic resources and preserves our rural character in Frederick County, Virginia. Our organization sprang from the extremely controversial rezoning and expansion proposal of a massive limestone quarry directly through 500+ acres of core Cedar Creek Battlefield adjacent to the National Historical Park. Throughout a more than two-year rezoning battle – we came to love and appreciate all of the important resources this Park has to offer our community and this nation and we will continue to do all we can to support and ensure the best possible outcome for this crown jewel in our community.

We fully concur with the elements common to the action alternatives for Park management. NPS's vision of working with partners to realize common goals will protect the Park's valuable assets, provide quality interpretation opportunities including visitor services and ensure that the Park serves as a focal point for the beautiful Shenandoah Valley Battlefields National Historical District. Additionally, we support the adoption of written strategies between NPS and the Key Partners of the Park to implement the GMP and Park's operating policies.

We support Management Element 10 – that NPS and Key Partners provide technical assistance to one another, as well as to private landowners and nearby communities for matters of land and water conservation/preservation efforts, important rural land use planning, and best management practices for local ecology, forests and agriculture. Working hand in hand on all of these efforts will enhance the community and Park to guarantee that tourists have a valuable and meaningful experience while visiting.

Preserve Frederick strongly endorses **Alternative D** as the final plan for Cedar Creek and Belle Grove National Historical Park. We believe it provides the best protections for the Park's natural, cultural and historical assets. A NPS-managed central visitor center which encompasses ALL aspects of the Park and helps showcase the greater Shenandoah Valley Battlefields National Historical District is THE BEST solution for presenting all interpretive themes within the Park. It pulls all of the pieces of the puzzle together for a stunning picture of how centuries of history shaped this region... and the nation. We believe that **Alternative D** makes perfect sense for the future of Cedar Creek and Belle Grove National Historical Park.

We applaud the committee's work and are excited about what this Park's future looks like. But we are also deeply concerned about how the area outside the Park boundaries could affect the success of the Park.

The 1992 NPS Study of Civil War Sites in the Shenandoah Valley recognized that hundreds of acres of Civil War core area at Cedar Creek Battlefield were at serious risk from the potential expansion for mining and other development. The National Trust for Historic Preservation and Belle Grove Plantation both have highlighted those same concerns since the early 1960's. The Civil War Preservation Trust has placed Cedar Creek Battlefield on its 10 Most Endangered Battlefields list for the past 2 years. The historic and cultural resources alone in this area are priceless.

However, in 2006, a grave threat to the Park's success was realized when a massive rezoning proposal from the Park's next door 'neighbor' in Middletown –a limestone mining company moved forward for approval. This also served as a massive blow for the community and its picturesque rural areas.

Preserve Frederick fought this destructive proposal for over two years, using every available resource and strategy at our disposal to combat the expansion of a gaping industrial mining pit ½ mile wide and 3 miles long straight through core battlefield areas, Middle Marsh Brook, the Nieswander Fort footprint, two 18th and 19th century cemeteries and directly adjacent to the park and historic Belle Grove Plantation. Using fact and science we presented arguments that should have made a no vote easy. No longer was this the time or location for expanded mining operations. Regretfully, the sound arguments of Preserve Frederick and our valued local, state and national partners were ignored. In addition to all of the negative consequences to the park and greater community brought about by expansion of this dirty, noisy, unsightly industry, there are threats from I-81 expansion, 500Kv power lines and expanded commercial and private homeowner development in this and other local areas surrounding the park. We must continue to address all of these threats to the Park as they will directly impact visitor experiences and the local tourist economy dependant on the Park's success.

Preserve Frederick respectfully requests that additional steps be taken to study and expand Park boundaries to more accurately reflect the Cedar Creek Battlefield Core area as described in the 1992 Study mentioned above. Cedar Creek, Belle Grove Plantation and the entirety of Cedar Creek Battlefield are all in harm's way as development encroaches on these sensitive areas. All that can be done - must be done - to protect and enhance these treasured resources. We firmly believe, as outlined in Section 1.11 Park Boundaries – that all of the criteria listed - meets what is required for boundary study and adjustment.

Since its inception Preserve Frederick has been a strong supporter of Cedar Creek and Belle Grove National Historical Park. The Park has become an important addition to our community

and has captured our hearts and imaginations. We recognize the role this Park will play in the lives of our children and our children's children for generation to come. Certainly as a result of the rezoning controversy, we understand the critical importance of protecting natural, cultural and historic resources for the future as we never did before.

Again we applaud the countless hours that went into this Draft GMP. We fully support **Alternative D** and the elements provided within that section and look forward to helping Cedar Creek and Belle Grove National Historical Park realize the full potential of a magnificent national treasure right here in our own back yard.

Respectfully Submitted,

Wendy J. Hamilton
President, Preserve Frederick
540-869-5024

SgtMaj. Richard H. Van Norton, Jr, USMC (ret)
The Dutch Meadow Farm
452 Paddys Run Road
Star Tannery, Virginia 22654

February 25, 2009

Mr. Chris Stubbs
National Park Service
Middletown, Virginia

Dear Mr. Stubbs:

I am a retired U.S. Marine, Virginian by birth, and landowner in the Shenandoah Valley. I chose to retire here after nearly 25 years as a Marine because of my interest in the historical significance of this area. I traveled here as a youngster to observe the North South Skirmish Association shoots each year. I was a member of an Explorer Post within the Boy Scouts of America that emphasized history and Archeology. Those lessons almost 50 years ago remain clear in my mind. I have spent a lifetime reading, studying and visiting historical sites all over the world. The vast amount of my study has been about the Civil War.

Upon my retirement I was initially employed as a District Executive, Shenandoah Area Council, BSA in Winchester, Virginia. Over the next several years I was able to observe a number of events centered around Civil War History from Hupps Hill in Strasburg, Virginia to Antietam in Sharpsburg, Maryland. The interest the boys displayed was reminiscent of my memories as a youngster mesmerized by the history of my ancestors.

Several factors have come to my attention and cause me concern. Please consider the fact that the ground on which this Park is set is private property, individuals and non profit enmities, shared with the public via the National Park Service. To in anyway restrict the options that can be excercised by the landowner is reminiscent of the action taken by the federal government to establish the Shenandoah National Park. I truly believe that was in a very real way the same thing the government did to take away the land rightfully owned by the numerous tribes of Native Americans. In both cases it was an injustice that we as Americans must all share the blame for. Lets make sure that the National Park Service doesn't show the appreciation of our citizens by repeating the sins of the past. The landowners must have the final say on the access to their property and the dispositions of any artifacts that may be discovered there.

The annual events that bring tourists to the area to observe and learn must not be discouraged. Measures can be taken to prevent destroying the historical aura that exists here while encouraging the educational use of the battlefields and surrounding area. Far more tragic is the development of the farms and battlefields into neighborhoods. Battlefields and farms that are covered with homes loose their historical value forever. Few developers become wealthy, the homes become a tax drain as we create the infrastructure to provide services and we all loose another piece of our heritage.

Please consider my points and the points of my fellow citizens and remember the National Park Service represents all citizens....whether their choices are good ones or not.

Respectfully,

County of Shenandoah

BOARD OF SUPERVISORS

DISTRICT 1 - DICK NEESE 540-740-3414
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OFFICE OF COUNTY ADMINISTRATION

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COUNTY ADMINISTRATOR

MARY T. PRICE
ASSISTANT COUNTY ADMINISTRATOR

Shenandoah County Resolution of Support for the Cedar Creek and Belle Grove National Historical Park

WHEREAS, Cedar Creek and Belle Grove National Historical Park was created by Congress in 2002 under Public Law 107-373 to preserve the historic and natural resources in the Cedar Creek Battlefield and Belle Grove Plantation areas; to interpret the history of the Shenandoah Valley; to work with partners, landowners and communities; and to serve as a focal point within the Shenandoah Valley Battlefields National Historic District; and

WHEREAS, Cedar Creek and Belle Grove National Historical Park contains nationally significant historic, natural, cultural, military, and scenic resources and inspiring settings of great natural beauty; and

WHEREAS, the National Park Service, the key partners, and the park community partners are charged with planning for and managing Cedar Creek and Belle Grove National Historical Park as a unit of the National Park System for the benefit and enjoyment of future generations; and

WHEREAS, the property owned by Shenandoah County, now known as the Keister Tract, serves as an important gateway to Cedar Creek and Belle Grove National Historical Park; and

WHEREAS, visitors to Cedar Creek and Belle Grove National Historical Park provide important economic benefits to the communities of Shenandoah County; and

WHEREAS, the National Park Service, the key partners, the park advisory commission, and other stakeholders have prepared the Draft General Management Plan that provides for the management of Cedar Creek and Belle Grove National Historical Park; and

WHEREAS, Alternative D in the Draft General Management Plan provides the highest degree of protection for the important resources within the park and the best opportunities for visitors to understand and enjoy these resources.


NOW, THEREFORE, BE IT RESOLVED, that the Board of Supervisors of Shenandoah County, Virginia, endorses and supports Alternative D in the Draft General Management Plan and urges the Secretary of Interior to approve and implement this alternative.

Page 2
Shen Co Resolution
Cedar Creek Belle Grove

Adopted on a motion and seconded by Helsley and Morris and
by a vote of 6-0 at a regularly scheduled meeting of the Board of Supervisor on
February 24, 2009.

ATTEST:

J. Poling
Vince E. Poling, Clerk of the Board



David E. Ferguson, Chairman
Shenandoah County Board of Supervisors

Shenandoah FORUM

4689 Wissler Road Mount Jackson, Virginia 22842 • info@ShenandoahForum.org • www.ShenandoahForum.org

February 24, 2009

Ms. Diann Jacox
Superintendent
Cedar Creek and Belle Grove National Historical Park
P. O. Box 700
Middletown, Virginia 22645

Re: Cedar Creek and Belle Grove National Historical Park General Management Plan

Dear Superintendent Jacox:

The Shenandoah Forum citizens group would like to offer comments on the draft General Management Plan (GMP) for the Cedar Creek and Belle Grove National Historical Park.

Shenandoah Forum is a non-profit group of Shenandoah County residents that works to foster informed dialogue among diverse interests in the county to address issues of growth and development. Its mission is to ensure the county remains essentially rural, preserves a healthy environment, promotes a sustainable economy, and provides a high quality of life for the people who live in our region.

The Forum is a strong proponent of the park and the resource protection, community enhancement, and economic development benefits that it brings to our region. A portion of the Cedar Creek battlefield is in Shenandoah County and the park boundary includes one of the county's future parks on the Keister Tract.

In addition, the park is just north of the Fisher's Hill and Tom's Brook Civil War battlefields in Shenandoah County and the Forum supports the preservation effort underway at those battlefields by the Shenandoah Valley Battlefields Foundation and the county, which we believe will be enhanced by the presence of the national park.

Support for Common Management Elements

In general, Shenandoah Forum supports the ten elements common to all of the action alternatives for management of the park and their underlying vision of working with partners to accomplish common goals for resource protection, interpretation, and visitor services, and ensuring that the park serves as a focal point for the Shenandoah Valley Battlefields National Historic District. The Forum also supports the adoption of written strategies between the NPS and the Key Partners, especially Shenandoah County, to implement the GMP and the park's operating policies.

In particular, Shenandoah Forum supports Management Element 9, in which the "NPS and the Key Partners would provide technical assistance to one another, to private landowners, and to nearby communities" in matters of community planning, rural land-use planning, voluntary land conservation by private landowners, agricultural best management practices, ecological restoration, forest management, and other activities. Providing this sort of technical assistance for the park's surrounding communities will not only lead to furtherance of the park's purposes, but it will deliver an untold benefit for the region's effort to maintain its historic, agricultural, and rural character.

The Forum also supports the Management Zones concept as a way to ensure that park's historic, cultural, and natural resources are protected while providing opportunities for a variety of visitor experiences in a way that does not overburden the park's capacity and its private landowners. In particular, the sensitive resource zone will foster the protection of the park's waterways and riparian buffers and its fragile ecological areas.

Endorsement of Alternative D

Of the four management alternatives considered in the GMP, the Forum strongly endorses Alternative D as it is most likely to deliver upon the promise of the park and make it a truly meaningful asset for our community and our nation.

Alternative D's land protection planning concept will foster the strongest protection of the historic, cultural, and natural landscape that makes this part of the Shenandoah Valley unique.

The vision of a trail network for the park that will connect the park to the surrounding community is another strong element of Alternative D that will provide visitors and residents with meaningful opportunities to experience our region's history, expand its recreational offerings, and offer alternative transportation options for exploring this landscape.

In particular, the Forum supports connecting the park's other historic and natural sites with those at the Keister Tract and, in cooperation with the Shenandoah County Parks and Recreation Department, the U.S. Forest Service, the Shenandoah Valley Battlefields Foundation, and other partners, linking the park's trails to other resources: the George Washington National Forest and a future trail system in Strasburg and at the Fisher's Hill and Tom's Brook battlefields.

Finally, the Forum supports the NPS-managed visitor center in Alternative D. To deliver the strongest economic development benefit, it is important for this facility to provide comprehensive orientation for the park and the region (through its effort to orient visitors to the Shenandoah Valley Battlefields National Historic District).

In addition, the interpretive, educational, research, and conservation programs that would be possible with this center will provide opportunities for visitors and residents learn about and grow more mindful of our region's important historic, cultural, and natural resources.

Park Boundary Adjustment

The Forum notes that the draft GMP does not include a boundary adjustment for the park. However, the current boundary does not include all of the important resources associated with the park. In particular, it only includes a portion of the core area of the Cedar Creek battlefield, an omission that detracts from the ability of the park to tell the full story of the battle and its impacts.

We would recommend that the final GMP consider addressing this by reviewing the battlefield area and including a recommendation for a boundary adjustment that would include the entire battlefield so that it enjoys the same protection as those areas of the battlefield within the current boundary.


Fostering Compatible Development

We would caution the National Park Service, the park's Key Partners, and especially the towns and counties surrounding the park to be mindful of unintended and potentially detrimental impacts of the park, namely inappropriate and incompatible development often associated with national park sites that would detract from the park's historic, cultural, and natural resources.

To avoid such negative impacts, Shenandoah Forum will recommend that the town of Strasburg and Shenandoah County incorporate the park's final General Management Plan into their comprehensive plans and update their ordinances accordingly with provisions such as overlay districts, developmentally-sensitive areas, and/or other land use planning techniques for areas within and adjacent to the park that might address these concerns.

Shenandoah Forum looks forward to a strong working relationship with the NPS staff at Cedar Creek and Belle Grove and to the development of a successful park for our region and our nation. Thank you for the hard work that you and Chris Stubbs in your office have done on this draft plan.

Sincerely,



Kim Woodwell
Executive Director
info@shenandoahforum.org

CC: Shenandoah County Board of Supervisors and County Administrator
Strasburg Town Council and Town Manager



Resolution for Cedar Creek and Belle Grove National Historical Park

WHEREAS, the Town of Strasburg is located adjacent to the Cedar Creek and Belle Grove National Historic Park, and serves as an important gateway and community partner to the Park, and benefits from the presence of the Park; and

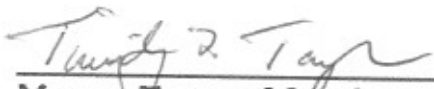
WHEREAS, the Cedar Creek and Belle Grove National Historic Park was created in 2002 by an act of Congress under Public Law 107-373 to preserve historic, natural, cultural, military, ecological and scenic resources within and near the Cedar Creek Battlefield and Belle Grove Plantation areas and to provide opportunities to tell the history of our northern Shenandoah Valley; and

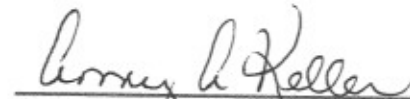
WHEREAS, the success of the Park depends on the cooperative engagement of the National Park Service, five key partners, adjacent communities and other stakeholders to manage and protect its important resources and to be a focal point within our National Historic District providing opportunities for visitors' enjoyment; and

WHEREAS, the Alternative D of the Draft Management Plan as proposed by the National Park Service, the Park Advisory Commission and key partners provides the best framework to manage, protect, interpret and promote the Park.

NOW, THEREFORE, BE IT RESOLVED, that the Town Council of the Town of Strasburg, VA endorses and supports Alternative D in the Draft Management Plan and urges the Secretary of the Interior to approve and implement this alternative.

Attest: Adopted at a regular meeting of the Strasburg Town Council on **February 10, 2009.**


Mayor, Town of Strasburg


Town Clerk, Town of Strasburg



SUSAN M. GOLDEN
GOLDEN FARM
207/353 BOYERS MILL LANE
MIDDLETOWN, VA 22645

February 27, 2009

Ms. Diann Jacox
Superintendent
Cedar Creek & Belle Grove National Historical Park
National Park Service
P.O. Box 700
Middletown, VA 22645

Dear Ms. Jacox:

Thank you for allowing me to comment on the Cedar Creek and Belle Grove National Historic Park ("CCBGNHP" or "Park") Draft Management Plan. I serve on the Boards of Directors for both the Cedar Creek Battlefield Foundation ("CCBF") and Belle Grove Plantation ("BGP"). I also am a resident of Middletown, Virginia, site of the CCBGNHP. Consequently, I am very involved in multiple aspects of the Park. However, please note that I am writing this letter on my own behalf, and I am not writing on behalf of, or under the auspices of, any organization with which I am affiliated.

As per my conversation with Christopher Stubbs of the National Park Service ("NPS"), I will divide my comments into general remarks and specific recommendations for language changes. As a lawyer, I firmly believe that the final Management Plan must say exactly what is intended; future generations are relying on us to be specific as to our intent under the Management Plan.

GENERAL COMMENTS

Although the intent of the CCBGNHP is to work together to make the Park a "unit", it must be reiterated that each entity that makes up the Park is a separate and distinct, but equal, entity to all of the other entities within the Park. As such, each entity will continue to run its organization, and to utilize its lands and resources, both natural and financial, as each entity deems appropriate.

I am sure that each entity within the Park desires to protect as much of our unique, historic resources as possible, and will work together to that end. However, the future purchase of land and other resources will, by definition, be done on an entity by entity basis. No entity should be nor will be required to purchase land or other resources for the NPS, an arm of the United States federal government.

The expertise of the NPS, and the resources brought to the Park by the NPS are greatly appreciated, and I am certain that the Park Partners will avail themselves of all of the benefits the NPS brings to the Park. It must be stressed, however, that final decisions regarding everything from sensitive areas, archeological studies, museum collections, conservation and land use issues, etc. will be made by the ownership entity.

Additionally, as each entity individually owns its own land and resources, derivatives of those resources, by definition, belong to the ownership entity. For example, artifacts found on a property belong to the ownership entity, and will be handled by that entity, as it deems appropriate.

The interpretative programs to be offered by NPS rangers will add greatly to the CCBGNHP. Currently, several entities within the Park have, or are developing, interpretive programs. To the extent that the NPS augments these programs, the augmentation must be done at the request of, and to the specification of, the inviting entity.

Any “Friends” group of the NPS must be designated as such, and care must be taken to define this group as friends of the NPS, and not of individual entities, unless such entity agrees to participate with the Friends group on a case-by-case basis. Care also must be taken to distinguish this group from any other groups working for entities in the Park, so that confusion does not exist over which entity is responsible for, and benefitting from, a certain activity.

On a final, general note, there has been no end of controversy surrounding who and what can be designated a “Visitor’s Center” within the Park. I firmly believe that the controversy is one of semantics, and should die a natural death. The current entities within the Park each focus on specific times or places, and as such, each entity should be entitled to develop its programming regarding preservation, education and outreach accordingly. To the extent that there is overlap between the programming of the entities, whether it is an overlap of the books being sold, or an overlapping history of the Civil War, all will add to the visitor’s Park experience. That being said, the NPS should be the overall “Visitor’s Center” for the Park, interpreting ALL aspects of the Park, and helping to guide visitors through the Park. Whether an entity calls itself a “Visitor’s Center” or a “visitors contact facility” does not and should not matter; it is what the entity does that matters.

SPECIFIC COMMENTS

Summary p. v

Should read throughout document:

“Cedar Creek Battlefield Foundation Visitor’s Center”

“NPS rangers would offer interpretive programs and activities at its visitor’s center, and at NPS-owned focal areas. NPS rangers may offer interpretive programs and activities at Key Partner sites and at other properties in and outside the Park, as may be requested.”

Chapter 1

p. 1-3

Land Protection

Should read:

“The Key Partners, other non-profit organizations, and a park friends group may assist the NPS with securing funds for land acquisition.”

Visitor Experience

Should read:

“The Battle of Cedar Creek reenactments, and other special activities, continue as special events sponsored by some of the Key Partners.”

p. 1-4

Visitor Facilities

Should read:

“Undue redundancy of facility development is avoided as much as possible.”

p. 1-35

Museum Collections

Should read:

“ . . . it is anticipated that archeological research will be conducted on NPS-owned lands in the future.”

p. 1-41

Paleontological Resources

Should read:

“Any specimens found and collected during construction activities would be managed according to NPS museum collection policies, to the best of the owner’s ability.”

Chapter 2

p. 2-20

Sensitive Resource Zone/Overall Concept

Should read:

“Natural resource protection is the primary goal within this zone, and should be done to the highest standards, as determined by, and to the best ability of, the owner.”

p. 2-21

Large Event Zone/Appropriate Types . . . Management

Add:

“to be determined by the owner.”

p. 2-23

Cedar Creek Battlefield . . ./Existing Condition . . .

Add:

“Research Library and other research resources”

p. 2-25, 2.6.1

See Summary p. v above.

p. 2-31, 2.7.1

See Summary p. v above.

p. 2-34, 2.7.1

Delete:

“and funding for their purchase would be a collaborative effort.”

p. 2-37, 2.7.8

Should read:

“maintaining NPS-owned park lands and facilities, and others as requested”

p. 2-38

Land Acquisition Costs

See p. 2-34, 2.7.1 above

p. 2-39, 2.8.1

See Summary p. v above

p. 2.40, 2.8.3

See p. 2-34, 2.7.1 above

p. 2-46

Land Acquisition Costs

See p. 2-34, 2.7.1 above

p. 2-49, 2.9

Delete entire paragraph:

“Special events that cover large area . . .”

Delete sentence:

“To minimize and contain these impacts . . .”

Should read:

“Mitigation measures, such as . . .”

p. 2-50, 2.10

Should read:

“Future resource management and development of visitor facilities owned by the NPS at Cedar Creek . . .”

p. 2-55, 2.10.2

Should read:

“A user-capacity framework, agreed to by each owner, would be implemented . . .”

Respectfully Submitted,

Susan M. Golden

February 27, 2009

Ms. Diann Jacox
Superintendent
Cedar Creek and Belle Grove National Historical Park
P. O. Box 700
Middletown, Virginia 22645

Re: Cedar Creek and Belle Grove National Historical Park
Draft General Management Plan

Dear Superintendent Jacox:

The Shenandoah Valley Battlefields Foundation is pleased to offer comments on the Draft General Management Plan and Environmental Impact Statement for Cedar Creek and Belle Grove National Historical Park.

The Shenandoah Valley Battlefields Foundation (SVBF) is a Key Partner for the park and the owner of more than 460 acres of protected battlefield land within the park boundary. In addition, the SVBF is the authorized steward of the Shenandoah Valley Battlefields National Historic District. As such, the SVBF takes particular pride and interest in the Cedar Creek and Belle Grove National Historical Park (CEBE). As the District's Management Plan recommended the creation of a unit of the National Park System at Cedar Creek, it is especially gratifying for us to see the park begin to take shape.

The legislation that created the park noted that one of the purposes of the park is to

...serve as a focal point to recognize and interpret important events and geographic locations within the Shenandoah Valley Battlefields National Historic District representing key Civil War battles in the Shenandoah Valley, including those battlefields associated with the Thomas J. (Stonewall) Jackson campaign of 1862 and the decisive campaigns of 1864.¹

The CEBE Draft General Management Plan (GMP) considered four alternatives for management of the park. The Shenandoah Valley Battlefields Foundation believes that Alternative D best fits the goals and recommendations of the National Historic District's Management Plan and will strengthen the ability of the park and our common public and private partners to implement the District's Plan.

¹ Cedar Creek and Belle Grove National Historical Park Act. Pub. L. 107-373. 19 Dec 2002.



Alternative D also provides the best opportunity to accomplish the park's legislated purpose to serve as a "focal point" for the National Historic District.

We would also note that as a participant in all of the public meetings conducting during the development of this plan as well as in our own meetings with partners and stakeholders, we have found that the public has overwhelmingly favored a strong National Park Service (NPS) role and presence at Cedar Creek and Belle Grove. The management approach embodied in Alternative D is consistent with that public opinion.

Shenandoah Valley Battlefield National Historic District

In 1996, Congress created the Shenandoah Valley Battlefields National Historic District to, among other things, "create partnerships among Federal, State, and local governments...and the private sector...to preserve, conserve, enhance, and interpret the nationally significant battlefields and related sites associated with the Civil War in the Shenandoah Valley."²

The Federal Commission created by the District's legislation to develop a plan for management of the District held more than 90 public meetings throughout the region to receive public input about how best to accomplish the goals in the legislation.

The resulting Management Plan for the District, approved by the Secretary of the Interior in 2000, included as one of its key recommendations the creation of a unit of the National Park System at Cedar Creek. It also recommended that the NPS continue to provide technical assistance throughout the District and develop facilities at the Cedar Creek battlefield that would support the District's activities.³

The District's legislation also directed the NPS to develop a Special Resources Study for the District, concurrent with the development of the District's Management Plan. The study's findings supported the recommendations from the Management Plan that Cedar Creek and Belle Grove met the criteria for a National Park unit.

Alternative D: The Best Fit for Implementation of the Shenandoah Valley Battlefields National Historic District Management Plan

The Shenandoah Valley Battlefields Foundation endorses all ten of the management elements that are common to all of the management alternatives in the draft plan. The partnership concept that underlies these elements was a fundamental principle in the creation of the park and must guide its future management.

SVBF notes Management Element 5, in particular:

The park would serve as a focal point for important historical events and geographic locations within the Shenandoah Valley Battlefields National Historic District; interpretive media on the National Historic District would be accessible in the park.⁴

² Shenandoah Valley Battlefields National Historic District and Commission Act of 1996. Pub. L. 104-333.

³ Shenandoah Valley Battlefields National Historic District Commission. Shenandoah Valley Battlefields National Historic District Final Management Plan. (New Market, Virginia. 2000.) 89.

⁴ National Park Service. Cedar Creek and Belle Grove National Historical Park Draft General Management Plan. (Middletown, Virginia. 2008.) 2-13.

Stronger, More Effective Partnerships

The Shenandoah Valley Battlefields Foundation supports Alternative D's vision for defining formal relationships between the NPS and the park's Key Partners: SVBF, the National Trust for Historic Preservation, Belle Grove Inc, the Cedar Creek Battlefield Foundation, and Shenandoah County. Formally defining these relationships and the roles of each of the partners and the NPS will strengthen the collaboration between the partners and the NPS in the stewardship of the park's and the District's resources and interpretation of their stories for visitors.

Meaningful Protection and Management of Park and District Resources

Besides serving as a focal point for the National Historic District, the park was established to "preserve the significant historic, natural, cultural, military, and scenic resources found in the Cedar Creek Battlefield and Belle Grove Plantation areas."

The National Historic District's legislation contains similar language and thus the District's Management Plan includes "provisions for the protection and interpretation of the natural, cultural, and historic resources of the District."

Because the land protection plan envisioned in Alternative D would consider the wide array of historic, natural, and cultural resources associated with the park and the District, Alternative D is the best fit for accomplishing the goals articulated in each entity's legislation.

In addition, stewardship of the park's important cultural resources would be more effective with the stronger presence of the NPS and the more formalized relationships between the NPS and the Key Partners in Alternative D.

A Comprehensive Visitor Experience in the Park and the National Historic District

Alternative D provides the greatest degree of integration between the National Historic District and the park with regard to the visitor experience.

The District's Management Plan calls for the creation of five orientation centers throughout its eight counties, including one in the Cedar Creek area. Alternative D's vision of a comprehensive, NPS-managed visitor center is consistent with this directive.

As envisioned in Alternative D, the visitor center will provide orientation for the park's stories and those of the National Historic District and will help visitors find and explore the sites that tell those stories both within the park itself and throughout the District.

Further, Alternative D provides for interpretive support and programs throughout the District as they related to both the park and the District.

Finally, the wide range of educational, research, and other resource conservation programs enabled by the comprehensive NPS-managed facility in Alternative D will foster a greater

understanding of the resources in the park and the District, leading to stronger stewardship of these resources by area stakeholders and the public.

Roadways and Trails: Connecting Visitors to the Resources in the Park and the District

The District's legislation, its Management Plan, and its recently completed Interpretive Plan all call for the creation of a network of historic roadways and trails to connect the region's historic and natural sites with one another, allowing residents and visitors to explore these nationally-important resources in an authentic and meaningful way.

As the SVBF works to encourage local communities, regional planning district commissions, and the Commonwealth to create linkages between battlefields and other community resources, connecting the park's internal trail system to that larger network will be crucial. For example, the SVBF expects to be working with the Town of Strasburg, Shenandoah County, and landowners at the Fisher's Hill and Tom's Brook battlefields to create a system of trails that connect the Cedar Creek battlefield area to those areas to the south.

The park's location within the District positions it to be a hub for visitation throughout the region. While all of the action alternatives considered in the GMP envision the creation of trails within the park, only Alternative D provides for a comprehensive network of trails connecting the various resources within the park to those outside of the park's boundaries and beyond.

Providing Technical Assistance for Management of the National Historic District

As noted above, the National Historic District's Management Plan recommends that the NPS continue to provide technical assistance for management of the District. Alternative D alone would accomplish this objective:

The NPS and the Key Partners would provide technical assistance to one another, to private landowners, and to nearby communities to protect resources within the park boundary, important views from the park, and thematically related resources in proximity to the park and within the Shenandoah Valley Battlefields National Historic District.⁵

NPS park operations and staffing levels in Alternative D are most likely to enable the park and the NPS to be able to accomplish the goals in the legislation for the park and the District.

Related Resources – Shenandoah Valley Battlefields National Historic District

Both Alternative C and D envision the NPS and the Key Partners collaborating to protect resources outside of the park boundary that are related to the park. However, as stated above, Alternative D provides the greatest degree of support for and integration with the District's goals and activities.

⁵ National Park Service. Cedar Creek and Belle Grove National Historical Park Draft General Management Plan. (Middletown, Virginia. 2008.) 2-45.

The Park Boundary and the Cedar Creek Battlefield

As noted in the draft GMP, the park boundary does not include the entire core area of the Cedar Creek battlefield, as it is defined in the 1992 NPS *Study of Civil War Sites in the Shenandoah Valley of Virginia*.⁶

The Cedar Creek battlefield is one of ten included in the District's legislation for protection activity by the Shenandoah Valley Battlefields Foundation. As such, the SVBF mandate is to work with public and private partners to foster protection of the Cedar Creek battlefield landscape, especially those areas that retain their historic character and significance.

Because national park status is among the strongest levels of protection within the federal system of historic resource designation, inclusion of the entire Cedar Creek battlefield core area within the park boundary would be beneficial for achieving the legislated purposes of both the park and the District.

The draft GMP does not include recommendations for a boundary adjustment for the park. It does, however, note that the NPS will "complete a boundary study to determine if a park boundary adjustment is needed."⁷

Ideally the final GMP would itself include a recommendation for a boundary adjustment to incorporate the entire Cedar Creek battlefield core area. However, if inclusion of such a recommendation in the GMP is not possible, the SVBF strongly encourages the NPS to conduct the park boundary study as soon as possible in collaboration with the Key Partners, the surrounding communities, area landowners, and other stakeholders.

Finally, the GMP also notes that "the park's legislation directs the (Federal Advisory) Commission to advise the Secretary of the Interior with respect to the identification of sites of significance outside of the park boundary deemed necessary to fulfill the purposes of the Act."⁸ SVBF encourages the Commission to consider identifying these sites in advance of the pending boundary study in order to facilitate the study's work.

Conclusion: A Framework for Successful Collaboration

As articulated in their legislation and subsequent planning documents, the underlying visions for the Shenandoah Valley Battlefields National Historic District and the Cedar Creek and Belle Grove National Historical Park are strikingly similar. Both are directed to protect and interpret a wide range of nationally-important historic, cultural, and natural resources in the Shenandoah Valley and to do this work in collaboration with public and private partners.

However, the differences between the two complement one another and thus provide for a strong framework for collaboration to accomplish common goals. By working regionally, the District provides context for the park and its resource protection, management, interpretive, and visitor

⁶ GMP at 1-6. And National Park Service. Study of Civil War Sites in the Shenandoah Valley of Virginia. (Washington, DC. 1992.) <http://www.nps.gov/history/hps/abpp/shenandoah/svs0-1.html>.

⁷ GMP at 1-59.

⁸ GMP at 1-30.

services activities. The District also provides opportunities for collaboration with partners and resources throughout the region that enhance and facilitate the park's work.

The park, on the other hand, fosters collaboration within one of the most complex areas of the District. Three counties, two towns, a wide array of public and private partners, and an assortment of compelling historic sites that illuminate the broad history of the Shenandoah Valley—by providing an organizational structure for collaboration and coordination with all of these entities, the park is especially suited to ensure that the Cedar Creek battlefield and Belle Grove Plantation area of the District will be able to share its extraordinary and multifaceted history with generations to come.

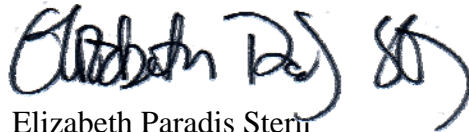
As the strongest approach for management of the park and as the alternative most consistent with the District's Management Plan, Alternative D will foster the sort of collaboration and cooperation between the two entities that builds on the strength of each and enables each to most fully support the other. Alternative D will help ensure the success of both the park and the District.

The Shenandoah Valley Battlefields Foundation strongly endorses Management Alternative D of the draft GMP and commends the NPS staff at Cedar Creek and Belle Grove for its work on this exhaustive and extremely comprehensive planning effort.

Sincerely,



Irvin E. Hess, MD
Chairman, Board of Trustees



Elizabeth Paradis Stern
Assistant Director for Policy and Communications

CC: David Ruth, Superintendent, Richmond National Battlefield Park
and NPS Designee to the SVBNHD

CEBE draft GMP

SVBF Notes and Suggested Technical Corrections

Section	Page	Paragraph	Note
1.5.3	1-8	4	The SVBNHD Management Plan was approved by the Secretary of the Interior in October 2000, not Congress.
Table 1.1	1-12	n/a	Hudson needs to be added to the end of the table: SVBF NPS and the Commonwealth of Virginia 2008 (We'll need to look up the final purchase cost.)
1.5.6	1-13	3 (SVBF subsection)	The SVBF was not created by Congress. More accurate text would be: The Shenandoah Valley Battlefields Foundation is the entity charged with implementing the <i>Shenandoah Valley Battlefields National Historic District Management Plan</i> (Heritage Partners, Inc. et al 2000c). To implement the District's management plan, the Foundation works to preserve, protect, interpret, and promote ten Civil War battlefields and related sites in the Shenandoah Valley, including the Cedar Creek Battlefield (see Figure 1.3). As of July 2008 the Foundation owned 460.3 acres and holds conservation easements on 32 acres within the park boundary. These properties are currently in agricultural use and are not open to the public.
1.10.2	1-54	4	Shenandoah County has actually now passed an ordinance implementing major recommendations of the Old Valley Pike Corridor Plan—it happened in late 2008. See § Section 165-150 of the Shenandoah County Code (http://www.shenandoahcountyva.us/reportscode/code/165.htm)
1.10.4	1-58	1	The SVBF's VIII Corps property (Hudson) needs to now be included in the area of impact for expansion of I-81.
1.10.5	1-58	3	In addition to Section 106 and Section 4(f) issues, FHWA and VDOT will need to comply with Section 6(f) of the Land and Water Conservation Fund Act with regard to taking land protected with LWCF money, including the SVBF's VIII Corps property which lies along both sides of the interstate.
3.1.1	3-1	3	Do these numbers include Hudson?
3.4.2	3-65	2	Interpretive and Marketing Plans are now final. The Shenandoah Valley Battlefields Foundation is dependent on collaboration among the Key Partners to achieve its goals in the Shenandoah Valley Battlefields National Historic District and does not operate visitor facilities. It <u>has developed</u> an interpretive plan to facilitate coordination of individual site interpretation in the district. Concurrently, a marketing plan for the district <u>was</u> prepared for the foundation by the Heritage Tourism Program of the National Trust for Historic Preservation. The two plans will provide a framework for implementing coordinated interpretation and over time, a high quality visitor experience in the district.
4.2.5	4-11	1	This paragraph needs to be updated to reflect the Frederick County BOS vote to rezone the quarry. Might suggest adding a reference to the memo from Paul Hawke at the ABPP to accompany the reference to the memo from the Geologic Resources Division. Might also suggest noting that the quarry is within the core area of the Cedar Creek battlefield.
Table 5.1	5-2	Line 5	Change to: Shenandoah Valley Battlefields Foundation Board of Trustees.
Table 5.1	5-4	Line 15	Change to: Shenandoah Valley Battlefields Foundation Board of Trustees.
Table 5.1	5-4	Last line	Cluster name is Signal Knob.
Table 5.1	5-5	Line 1	Cluster name is Signal Knob.

Section	Page	Paragraph	Note
Preparers, Reviewers, and Contributors	Preparers-2	Key Partners list	Howard's last name is misspelled. Should be Kittell.
Appendix B	B-1	Line 10	Shenandoah Valley Battlefields National Historic District Act and Commission Act of 1996 Remove first instance of the word "Act" such that it should read Shenandoah Valley Battlefields National Historic District and Commission Act of 1996
Appendix B	B-6	(Commonwealth of Virginia section)	Might suggest adding two items to the list of Virginia laws and regulations: <ul style="list-style-type: none"> • Open-Space Land Act (1966) – Among other things, this created the VOF. • Virginia Conservation Easement Act (1988) – This authorizes non-profit conservation organizations to hold easements in Virginia.
Appendix B	n/a	n/a	Do you want to reference the revised national programmatic agreement between the NPS, the NCSHPO, and the ACHP?



Seth Coffman

Shenandoah Headwaters Home Rivers Initiative Coordinator

February 5, 2009

Christopher Stubbs
Community Planner, Cedar Creek & Belle Grove NHP
PO Box 700
Middletown, Virginia 22645

RE: Comments on Park General Management Plan

Dear Mr. Stubbs:

I have reviewed the draft General Management Plan (GMP) for the Cedar Creek & Belle Grove National Historical Park (CCBGNHP or the park) and would like to provide the following comments.

Trout Unlimited is a national conservation organization committed to conserving, protecting, and restoring North America's coldwater fisheries and their watersheds. The Shenandoah Headwaters Home Rivers Initiative is a multi-year conservation project focused on improving native brook trout habitat and populations in the valley. To accomplish this goal Trout Unlimited uses a four prong approach of "Protect, Reconnect, Restore, and Sustain". This design protects our best remaining stream resources, reconnects them within the watershed, restores degraded stream segments, and sustains these activities through outreach and education. Efforts in the Shenandoah Valley will focus primarily on restoring habitat in valley spring creeks that once supported native brook trout and re-establishing self sustaining populations.

The CCBGNHP is blessed with an abundance of coldwater resources worthy of conservation, protection, and restoration. The two largest perennial streams within the park boundary, Cedar Creek and Meadow Brook, once contained populations of native brook trout, the only salmonid species native to Virginia. Due to past and current land use, the stream habitat has degraded to a point where it can no longer support brook trout. The development of the GMP for the park presents an opportunity to establish the framework for restoring the streams of the park to their natural and historical condition.

Minimizing impacts to the park's natural resources while improving the interpretation and development of its cultural and historical resources will not be an easy task. Trout Unlimited supports natural resource management actions that allow for the restoration of riparian and stream habitat along Cedar Creek and Meadow Brook. The designation of the riparian corridors (300ft each side) in the park as Sensitive Resource Zones as outlined in Alternative D provides for such management actions. Given the importance of the Cedar Creek watershed as a fundamental resource for the significance of the park all efforts should be made to ensure not only Cedar Creek but also its tributaries maintain high standards of stream habitat and water quality.

Trout Unlimited: America's Leading Coldwater Fisheries Conservation Organization

505 North Main Street, Suite 102 Woodstock, VA 22664

540.459.8163 • email: scoffman@tu.org • <http://www.tu.org>

The largest tributary of Cedar Creek in the park boundaries Meadow Brook warrants such efforts. The poor water quality of Meadow Brook can be improved by implementing the following recommendations made by the Virginia Department of Game and Inland Fisheries:

- Livestock exclusion fencing on all perennial and intermittent streams within the park boundaries
- Establish and maintain an undisturbed vegetated and/or forested riparian buffer along all wetlands, and both banks of all perennial and intermittent streams
- Use clear-spanning bridges, bottomless arches, or countersunk culverts for all trail - stream crossings to allow for aquatic organism passage and to minimize future maintenance costs and habitat degradation
- Design trails to protect riparian areas and where possible avoid any trails in the Sensitive Resources Zones of the park.

Although these recommendations were made with the aim to protect the habitat of state threatened and endangered species many other aquatic and riparian species, including brook trout, would benefit from these practices. The above practices would reduce bank erosion and sedimentation, filter pollutants during storm events, and provide shade to the stream which is critical to maintaining the water temperatures necessary for brook trout survival. Meadow Brook is currently listed as a “Stockable Trout Water” but is not stocked or actively managed as a recreational fishery. Improvements to the stream’s water quality and habitat by implementing best management practices would create the opportunity to reintroduce brook trout to Meadow Brook and provide an additional recreation opportunity to park visitors.

This restoration activity falls within the suggested natural resource management actions and objectives of Alternative D that calls for management activities that protect natural processes and population diversity (Table 2.7 GMP), and restore riparian habitat associated with Cedar Creek and its major tributaries in the park (pg 2-7 GMP). It is important to note that although an objective of protecting population diversity is admirable any restoration activities that occur should have an emphasis on establishing and protecting native species diversity.

Trout Unlimited thrives on its strong base of active volunteers, and building partnerships and coalitions to implement restoration efforts. We are willing to work with the park and its partners to improve and restore stream habitat in the park. I appreciate the opportunity to comment on the General Management Plan for the park, and I look forward to working with you and the park’s key partners to restore and protect Cedar Creek and its tributaries.

Sincerely,



J Seth Coffman
Shenandoah Headwaters HRI Coordinator

L. Preston Bryant, Jr.
Secretary of Natural
Resources



Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street, Suite 326
Richmond, Virginia 23219-2010
Phone: (804) 786-2556 Fax: (804) 371-7899

January 15, 2008

Mr. Christopher Stubbs
National Park Service
Cedar Creek and Belle Grove National Historic Park
Post Office Box 700
Middletown, Virginia 22645

RE: Cedar Creek and Belle Grove National Historic Park General Management Plan

Dear Mr. Stubbs:

Thank you for giving us the opportunity to comment on the draft General Management Plan (GMP) for Cedar Creek and Belle Grove National Historical Park. As the agency responsible for the development of the *Virginia Outdoors Plan* (VOP), which is Virginia's SCORP, and its implementation, the Department of Conservation and Recreation (DCR) is pleased to be included in the development of your GMP. In this capacity, we support *Preferred Alternative D* as the alternative that most closely represents the goals and recommendations of the 2007 VOP.

Alternative D effectively addresses most of the issues and recommendations provided to you in our comment letter of January 22, 2008. The GMP recognizes the necessity of continuous collaboration with DCR and other organizations and agencies throughout the planning process and during future implementation. Alternative D offers the most protection of park resources, adjacent lands, and viewsheds. It includes the continuing support of existing programs and provides multimodal access to the region.

DCR also concurs with the proposed designation of the Valley Road (Route 11) as a scenic/historical byway. In conjunction with the proposed overlay district, it could provide protection to the scenic and historic attributes of the corridor. Roads with Virginia Byway designation are highlighted on state tourism maps, and this will increase awareness of the importance of this resource for tourists, project reviewers and local citizens. If the National Park Service were able to work with localities to request scenic/historic byway designation, the recognition, if obtained, would help protect the park boundaries, approaches and connections.

DCR supports the GMP recommendations for connecting the park to nearby federal and local recreational lands. Additionally, DCR supports the proposed connections to the North Fork of the Shenandoah River and Cedar Creek as well as the plan focus on trail placement. The 2007

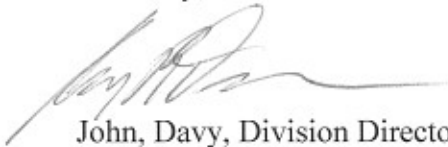
Mr. Christopher Stubbs
January 15, 2008
Page 2

Virginia Outdoors Plan (VOP) lists access to water as the number one recreational need in Virginia. Providing formal river access would be a great asset to the state and community. DCR recommends development of a water access component as part of the GMP.

As an agency involved in the protection of our natural, recreational, cultural and historic resources, it is our pleasure to continue to partner with you on implementation of the VOP as it relates to the GMP for Cedar Creek and Belle Grove National Historic Park. Feel free to contact us with any questions. Lynn Crump will continue to serve as our representative for this planning effort. She can be reached at (804) 786-5054, Lynn.Crump@dcv.virginia.gov, or 203 Governor Street, Suite 326, Richmond, VA 23219.

Thank you for the opportunity to be involved in this planning process.

Sincerely,



John, Davy, Division Director
Planning and Recreation Resources

cc: Robert S. Munson, Planning Bureau Manager
Lynn M. Crump, CLA, ASLA, Environmental Programs Planner
Robbie Rhur, Environmental Program Planner



COMMONWEALTH of VIRGINIA

Department of Historic Resources

L. Preston Bryant, Jr.
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
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www.dhr.virginia.gov

February 27, 2009

Diann Jacox, Superintendent
Cedar Creek and Belle Grove NHP
P.O. Box 700
Middletown, VA 22645

Re: Draft General Management Plan
Cedar Creek and Belle Grove NHP
Frederick County, Virginia

Dear Ms. Jacox,

Thank you for offering us the opportunity to comment on the General Management Plan Prepared for the Cedar Creek and Belle Grove National Historical Park. The draft plan is a thorough and well thought out document, presenting four alternatives for the continued management, use, and development of the Park. The intent of all the alternatives presented is to preserve the Park's natural and historic resources and to serve the needs of Park visitors, and all would satisfy these goals. We have no hesitation, however, in providing our strongest support to the preferred Alternative, Alternative D.

At this time there are no National Park Service operated visitor facilities. With the creation of a Visitor's Center the Park Service's mission of interpreting the battlefield memorial landscape and the full range of the historical events from prehistoric times to the 20th century would be greatly enhanced. Such a center would also provide the location for educational programs and research. Rehabilitation of the farmhouse and barn at the Whitham Farm offers an opportunity for such a central focus point, as well as a demonstration of a Green alternative in the reuse of an historic building. With a greater presence the Park Service would be in a position to provide technical assistance to its important Key Partners, Community Partners and private landowners, thus enabling these groups to expand their own interpretive programs and further encourage preservation of the Park's important resources.

The park's natural and cultural landscapes are nationally and regionally significant. The Key Partners now own and protect about a third of the land within the park boundary, preserving historic resources, maintaining open space, and protecting unique natural resources. Development of the proposed management zones in the park will provide an excellent tool to continue and expand the protection of these significant landscapes as will the development of formal agreements with partners and private landowners under this Alternative. Continuing to develop partnerships along with these lines will better able the Park's unique resources to be protected from encroachments, such as the proposed limestone quarry expansion, transmission lines and transportation projects. Protection will also be enhanced with continued donation of preservation easements and land in fee simple, as well as purchase from willing sellers.

The Department of Historic resources stands ready to working with you under Section 106 of the National Historic Preservation Act 106 as the Park Service initiates planning for the design and construction of specific projects referenced in this document.

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Preservation Office
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Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me at (804) 367-2323, ext. 112; fax (804) 367-2391; e-mail eeaton@dhr.state.va.us.

Sincerely,

Ethel R. Eaton, Ph.D., Senior Policy Analyst
Division of Resource Service and Review

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Comments: Cedar Creek and Belle Grove National Historical Park

I represent the Frederick County, Va., Equine Network, a three-year-old organization which is dedicated to supporting and promoting the equine industry in Frederick County.

We number about 55 members, who are both owners of businesses serving the horse industry and owners of horse businesses, or individuals who own one or more horses for recreation and pleasure.

The most recent Equine Census in Virginia was done in 2006.

At that time, there were at least 3,000 horses owned in Frederick County, an increase of 1,000 over those reported in the previous survey, in 2001.

In neighboring Clarke County, the equine census grew from 4,400 in 2001 to 6,000 in 2006.

Our local Southern States Cooperative has seen an increase of five percent in sales of equine related products.

Although the number of horses is growing and more people are riding, what we also see is a total lack of places to ride.

Roads in Frederick County are certainly not safe places for leisurely trail rides and most horse owners have small properties which don't allow a riding experience there.

In a survey we conducted when the FCVEN was formed, trail riding opportunities appeared on almost every survey form, no matter what type of equine activity the horse owner preferred.

So, one of our priorities in the FCVEN was a trail committee, dedicated to finding public land suitable to establish trails.

Battlefield properties in Frederick comprise the largest tracts of public and quasi-public lands, and so we are trying to work with groups and organization to fill a real recreational need in Frederick County.

We have horse owners, growing in numbers, who must travel out of the area to have a safe trail riding experience.

We would like to work with you and other groups to establish multi-purpose trails so that our members and their children would have places to enjoy their horses. We understand the economic situation, and we expect our members to help with costs for such facilities.

We recently worked with the Virginia Department of Conservation and Recreation to include horseback riding trails in the plan for the new Seven Bends State Park east of Woodstock and we are sitting in on the reworking of the George Washington National Forest master plan, in hopes of getting some sort of access for horses to use the trails in the forest that are located in Frederick County, which are currently not easily accessed with trucks and horse trailers.

In the future, if multi-purpose trails are considered as part of this park system, we would appreciate the opportunity to present a case for the many horse owners in Frederick County to have an equal opportunity to visit and enjoy this National Battlefield Park, perhaps using the Manassas Battlefield Park as a model.

Thank you for your consideration.

Sincerely Your,
Val Van Meter
Trail Committee
Frederick County,
Va., Equine Network

VALVANMETER@hotmail.com

P.O. Box 4242 Winchester - 22604

Artistically Framed,LLC
341 Fairfax Pike, #3
Stephens City, Virginia 22655

February 27, 2009

To Whom it May Concern:

I am a small business owner and former Re enactor that has spent a lifetime interested in, and involved in the history of the Shenandoah Valley. Several things have come to my attention that I would like to address in regard to the National Park Service plans for future use of, and their role in regard to the properties that fall within the area designated part of The Cedar Creek and Belle Grove National Historic Park.

As I understand the wording of the Cedar Creek and Belle Grove National Historic Park Act The properties within this park will be privately owned. As such I believe it is the landowners prerogative as to the use or limits of the use within their property limits. That said....any artifacts found on or within the boundries of their property should be theirs. How they determine to share or donate such artifacts should be their decision...not the National Park Service or any other entity whose sole purpose should be to educate and interpret not to confiscate.

The annual Cedar Creek Re enactment is an opportunity for many people to gather and share history. In many cases to walk the same ground their ancestors shed blood on almost a century and a half ago. To cease this and like events because they may trample on an overlooked relic is absurd. This is a working farm for the most part...with animals that for centuries before and after the battle have worked this land. Anyone that has seen the efforts of the re enactors and volunteers following each event can attest to the fact that it is returned to the same condition which existed prior to the event. The educational value far out weighs any possible scar which may exist because of its use.

I certainly hope that people will consider the hard feelings that still exist as a result of the government condemnation of the "PRIVATE" property to form what is today Shenandoah National Park.

Sincerely,

Walter A. Jagiello
President

COUNTY OF WARREN



County Administrator's Office
Warren County Government Center
220 North Commerce Avenue, Suite 100
Front Royal, Virginia 22630

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FAX: (540) 636-6066
Email: admin@warrencountyva.net

Douglas P. Stanley
County Administrator

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District


February 20, 2009

Ms. Diann Jacox
Superintendent
United States Department of the Interior
National Park Service
P. O. Box 700
Middletown, Virginia 22645

Dear Ms. Jacox:

The Warren County Board of Supervisors, at its regular meeting of February 17, 2009, adopted the enclosed resolution supporting Alternative D of the draft General Management Plan that provides the highest degree of protection for the natural resources within the Cedar Creek and Belle Grove National Historical Park and the best opportunities for visitors to understand and enjoy these resources.

Sincerely yours,



Douglas P. Stanley
County Administrator

Enclosure

JD

cc: Patrick Farris, Cedar Creek & Belle Grove National
Historical Park Advisory Committee

Resolution



of the Board of Supervisors of Warren County

WHEREAS, Cedar Creek and Belle Grove National Historical Park was created by Congress in 2002 under Public Law 107-373 to preserve the historic and natural resources in the Cedar Creek Battlefield and Belle Grove Plantation areas; to interpret the history of the Shenandoah Valley; to work with partners, landowners and communities; and to serve as a focal point within the Shenandoah Valley Battlefields National Historic District; and

WHEREAS, Cedar Creek and Belle Grove National Historical Park contains nationally significant historic, natural, cultural, military and scenic resources and inspiring settings of great natural beauty; and

WHEREAS, the National Park Service, the key partners, and the park community partners are charged with planning for and managing Cedar Creek and Belle Grove National Historical Park as a unit of the National Park System for the benefit and enjoyment of future generations; and

WHEREAS, Warren County, Virginia serves as an important gateway community to Cedar Creek and Belle Grove National Historical Park; and

WHEREAS, visitors to Cedar Creek and Belle Grove National Historical Park provide important economic benefits to Warren County and the surrounding communities; and

WHEREAS, the National Park Service, the key partners, the park advisory commission and other stakeholders have prepared the Draft General Management Plan that provides for the management of Cedar Creek and Belle Grove National Historical Park; and

WHEREAS, Alternative D in the Draft General Management Plan provides the highest degree of protection for the important resources within the park and the best opportunities for visitors to understand and enjoy these resources.

NOW, THEREFORE, BE IT RESOLVED, that the Board of Supervisors of Warren County, Virginia endorses and supports Alternative D in the Draft General Management Plan and urges the Secretary of Interior to approve and implement this alternative.

Adopted: February 17, 2009


Clerk, Board of Supervisors
County of Warren, Virginia