



APPENDIX **F**

**SUBSTANTIVE
PUBLIC COMMENT
CONCERN AND
RESPONSE REPORT
ON THE DRAFT GMP/EIS**

CEDAR CREEK AND BELLE GROVE NATIONAL HISTORICAL PARK



Appendix F

Substantive Public Comment Concern and Response Report on the Draft GMP/EIS

Comments Received during the Comment Period

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 in Appendix E above. 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.

All public comments received on the Draft GMP/EIS, were read and analyzed by the NPS GMP Planning Team. During the process of identifying public concerns, all comments were treated equally – they were not weighted by organizational affiliation or other status of respondents, and it did not matter if an idea was expressed by dozens of people or a single person. The process is not one of counting votes; emphasis is on the content of a comment rather than who wrote it or the number of people who agreed with it.

All substantive comments received a response from the NPS. Also included are a number of non-substantive comments that were raised with some frequency. These non-substantive comments are included in order to clarify both the plan and the legal mandates that NPS is required to follow in managing the park.

Table F.1 provides a summary of the comments received. Comments are organized by topic heading to help guide the reader. Because most subjects received more than one comment, the issue expressed by the topic heading is summarized as a concern statement that captures the concerns and ideas in the comments grouped under that topic heading. In most cases, the concern statement is accompanied by one or more representative quotes, or selected quotes taken verbatim from the public comments, that serve to illustrate the issue, concern, or idea captured in the concern statement. The NPS response follows the representative quotes. Finally, there is a list of each organization or individual who raised that particular concern.

Comments Received Following the Close of the Comment Period

The comment period for the Draft GMP/EIS ended on February 27, 2009. Following the closing 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. Of the five letters received from private individuals, one focused on the expansion of the limestone quarry located adjacent to the park boundary. The external threat presented by the quarry was raised in correspondence received during the official comment period and addressed in the Public Comment Concern

and Response Report. Of the four remaining letters, one was a duplicate of a letter received during the official comment period. The substantive issues raised in the three remaining letters, were previously raised in correspondence received during the official comment period. These issues include: objection to the environmental analysis of activities that occurred on private lands; statement that archeological artifacts found on private land would become the property of the National Park Service; objection to Key Partner visitor center being referred to as a “visitor contact facility;” statement that Key Partners would be required to raise money for the National Park Service; statement that the National Park Service would curtail activities held during the reenactment of the Battle of Cedar Creek; statement that the use of management zones represented a “taking” of private property; and statement that NPS would conduct interpretive programs on lands owned by Key Partners, without the owners’ permission. Each of these substantive issues were previously raised in correspondence received during the official period, and have been analyzed in the Public Comment Concern and Response Report.

In addition, the National Park Service received two letters from Congressman Frank Wolf (VA-10); the two letters requested a response to letters received from three constituents. Two of the constituent letters were duplicates of letters previously received by the park during the official comment period. The comments in both letters have been analyzed and responded to in the Public Comment Concern and Response Report. In the other case, the constituent letter had not been sent to the National Park Service, but published in the *Civil War Courier* newspaper. The issues raised by this letter include the statement that the private property rights of individual landowners were threatened by the park; statement that Key Partners would be required to raise money for the National Park Service; statement that the National Park Service would curtail activities during the reenactment of the Battle of Cedar Creek; and the statement that the use of management zones represented a “taking” of private property. The substantive issues raised in this letter had all been raised in correspondence received by the planning team during the official public comment period, and have been analyzed and responded to in the Public Comment Concern and Response Report. The park also received a petition with 304 names, which stated “WE THE UNDERSIGNED OPPOSE THE NATIONAL PARK SERVICE DRAFT GENERAL MANAGEMENT PLAN FOR THE CEDAR CREEK AND BELLE GROVE NATIONAL PARK.” The petition did not identify the specific actions in the Draft General Management Plan that the undersigned objected to. All correspondence received after the close of the public comment period is on file as part of the administrative record.

Table F.1 Summary of Substantive Public Comment Concerns (see Table F.2 for responses)

Comment Category and Subject	Comment Summary
Alternatives	
1 Friends Group	Comments support the creation of a friends group that would assist the NPS and advocate for the park. Concerns were raised that a friends group would confuse the public as to the identities and goals of the various partner organizations and would compete with the funding for or priorities of the Key Partners. (3 comments)
2 Preferred Alternative	Comments support Alternative D (the Preferred Alternative) as the alternative that best protects park resources, provides for visitor enjoyment, and creates a viable framework for partner collaboration. (22 comments)
3 Landscape Level Preservation	Comments support landscape-level preservation within the park. (4 comments)
4 Trails	Comments support a non-motorized trail system within the park that would connect to communities, battlefields, and natural areas outside the park. Some comments expressed a desire for horse trails within the park. (7 comments)
5 Roads	One comment expresses a desire that roads in the park remain unimproved. Another comment requests that the park not direct visitors to the park's road system until road improvements are made. Finally, one comment suggests that the park seek Virginia scenic byway designation. (3 comments)
6 Private Property Rights	Comments state the importance of private property rights within the park and express concern that the GMP infringes upon these rights. (3 comments)
7 Interpretive Programs	One comment expresses concern that NPS interpretive programs would be conducted on key partner property without the permission or invitation of the Key Partner. (1 comment)
8 National Historic District	Comments support Alternative D as the alternative that best integrates Cedar Creek and Belle Grove National Historical Park into the Shenandoah Valley Battlefields National Historic District. Furthermore, these comments support the concept of an NPS visitor center that would orient visitors to the park and to the larger National Historic District. (3 comments)
9 NPS Presence	Comments support a strong NPS presence and role at the park so that the agency is better able to provide technical assistance, interpretation, and resource protection. (4 comments)
10 Livestock	Comments support the continued pasturing of livestock within the park. These comments state that pasturing livestock is an historical activity in this region and has many benefits. (2 comments)
11 Bicycling	One comment noted the importance of bicycle use within the park as an alternative means of transportation. (1 comment)

Table F.1 Summary of Substantive Public Comment Concerns (see Table F.2 for responses) (continued)

Category	Comment Summary
12 Alternatives: Artifacts	Comments express concern that NPS would take ownership of artifacts found within the park regardless of the owner upon whose land they are found. (2 comments)
External Threats	
13 General	Comments express concern about external threats to the park, particularly from commercial and residential development, an adjacent limestone mine, and the proposed expansion of Interstate 81. Commenters believe that, of the alternatives considered in the GMP, the land protection strategy in Alternative D would best protect the park from these threats. (2 comments)
Facilities	
14 NPS Visitor Center	Comments support an NPS developed and managed visitor center for the park. Commenters feel that such a visitor center would serve as a central hub to orient visitors to the park and the National Historic District, support educational programs, provide economic benefits to surrounding communities, and address the interpretive themes proposed in the plan. (5 comments)
15 Existing Structures	Comments express an interest in exploring opportunities to adaptively reuse an existing historic structure to serve as the park visitor center. (7 comments)
16 Visitor Contact Facilities	Comments oppose the use of the term "visitor contact facility" to describe key partner facilities and imply the term is demeaning or connotes a facility of lesser importance. One comment supports the use of the term "visitor contact facility". (4 comments)
Historic Resources	
17 General	Comments support the interpretation of the full span of history. (3 comments)
Impact Analysis	
18 Impact Analysis: Key Partners	One of the Key Partners objects to the environmental analysis of the annual reenactment contained within the GMP and believes that their organization is better able to evaluate and judge the impacts associated with the hosting of battle reenactments than is the NPS. (2 comments)
Lands	
19 General	Comments support the land protection goals established in Alternative D. (1 comment)
20 Support for Collaboration	Comments support collaboration on land protection among the NPS and the Key Partners. (2 comments)
21 Opposition to Collaboration	Comments express concern that the Key Partners would be required to contribute funds toward NPS land acquisition efforts. (2 comments)

Table F.1 Summary of Substantive Public Comment Concerns (see Table F.2 for responses) (continued)

Category	Comment Summary
Large Events and Reenactments	
22 General	Comments express concern about the possibility that the NPS would curtail or limit battle reenactments and other large events that occur within the park. (3 comments)
23 Activities	One comment expresses concern that the GMP describes the battle reenactments as a negative activity. One comment states that there is no evidence to support the conclusion that battle reenactments cause resource impacts. (1 comment)
24 Collaboration	One comment expresses opposition to the concept that the Key Partners would collaborate on evaluating the appropriateness of special events and identifying measures to help protect park resources. (1 comment)
Mitigation Measures	
25 General	One comment supports mitigation measures for any construction activities to be undertaken within the park. (1 comment)
26 General	Comments support the management zones as a way to ensure protection of park resources. (5 comments)
Management Zones	
27 Support for Sensitive Resource Zones	Comments support the Sensitive Resource Zone as a means to ensure protection of the park's rare species and stream habitat and to educate the visitor about the importance of resource protection. (3 comments)
28 Opposition to Sensitive Resource Zones	One comment opposes the Sensitive Resource Zone designation and questions the basis for the designation. (1 comment)
29 Large Events Zones	One comment supports the large events zone designation, stating that the zone provides ample space for battle reenactments and other large events. (1 comment)
30 Private Property Rights	One comment expresses concern that the management zones appear to represent a taking of private property rights. (1 comment)
Natural Resources	
31 Riparian Habitat	Extensive comments were received expressing the importance of riparian or stream habitat within the park, particularly along the Shenandoah River, Cedar Creek, and Meadow Brook. These comments outline the particular species of concern that live within these water courses and express the importance of protecting these species and restoring their habitat. (2 comments)
32 Panther Conservation Site	One comment expresses the importance of the state-designated Panther Conservation Site that lies within the boundaries of the park and is on land owned by one of the Key Partners. This site contains rare species, high biodiversity, a unique plant association, and a significant cave. (1 comment)

Table F.1 Summary of Substantive Public Comment Concerns (see Table F.2 for responses) (continued)

Category	Comment Summary
33 Protected Species	Extensive comments, received from the Commonwealth of Virginia, detail the protected species of plants and animals that live within the park and express the importance of preserving these species. (1 comment)
Park Boundary	
34 General	Comments request that the NPS conduct a full boundary study to help protect related resources outside the park boundary. (5 comments)
35 Battlefield Core Area	Comments request that the NPS conduct a boundary study that would ultimately include the entire Battle of Cedar Creek core area within the boundaries of the park. (5 comments)
36 Buffer Zones	One comment requests that a protective buffer zone be created along the boundary of the park. (1 comment)
Partnerships	
37 General	Comments support strong partnerships and collaboration to ensure the success of the park. (8 comments)
38 Key Partner Autonomy	Comments support each Key Partner maintaining its autonomy and organizational identity. (2 comments)
39 Other Stakeholders	Comments express concern that the plan underemphasizes the importance and potential contributions of partnerships outside of those with the five legislated Key Partners and surrounding local governments (community partners). (4 comments)
40 Formal Relationships	Comments support the creation of more formal relationships and agreements between the NPS and the five Key Partners to strengthen collaboration and outline their roles in managing the park. (3 comments)
Technical Assistance	
41 General	Comments support the concept of technical assistance on a range of issues by and among the NPS and the Key Partners. (3 comments)
42 General	Comments support the incorporation of the GMP into the comprehensive plans of the surrounding communities. Additionally, comments support the provision of technical assistance for the management of the National Historic District. (2 comments)

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
Substantive Public Comment Concern and Response Report

Alternatives: Friends Group		1
Concern Statement		
Comments support the creation of a friends group that would assist the NPS and advocate for the park. Concerns were raised that a friends group would confuse the public as to the identities and goals of the various partner organizations and would compete with the funding for or priorities of the Key Partners.		
Representative Quote	The Park Federal Advisory Commission (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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation ■ Park Advisory Commission ■ Susan M. Golden 	
Response	The GMP at Section 2.3, Management Element #10, has been revised to state that any fundraising activities via a park friends group be constituted and promoted so as not to cause confusion regarding the activities, needs, and goals of the various key partner and public interest organizations. This section has also been revised to show that the creation of such a friends group is optional at the discretion of the NPS.	
Alternatives: Preferred Alternative		2
Concern Statement		
Comments support Alternative D (the Preferred Alternative) as the alternative that best protects park resources, provides for visitor enjoyment, and creates a viable framework for partner collaboration.		
Representative Quote	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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Belle Grove Board of Directors ■ Belle Grove, Inc ■ Civil War Preservation Trust ■ Frederick Co. Bd. of Supervisors ■ National Parks Conservation Assoc. ■ National Trust for Historic Preservation ■ Park Advisory Commission ■ Preserve Frederick ■ Shenandoah Co. Bd. of Supervisors ■ Shenandoah Co. Parks and Recreation ■ Shenandoah Forum ■ Shenandoah Valley Battlefields Fdn. ■ Shenandoah Valley Network ■ Town of Strasburg Town Council ■ Town of Middletown ■ Virginia Department of Conservation and Recreation ■ Virginia State Historic Preservation Office ■ Warren Co. Board of Supervisors ■ Barbara Adamson ■ Michael Kehoe ■ Catherine Pfeifer ■ Private Citizen (anonymous) 	
Response	Thank you.	

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
 Substantive Public Comment Concern and Response Report

Alternatives: Landscape-Level Preservation		3
Concern Statement		
Comments support landscape-level preservation within the park.		
Representative Quote	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 and Belle Grove National Historical Park.	
Commenting Parties	<ul style="list-style-type: none"> ■ Belle Grove, Inc ■ Civil War Preservation Trust ■ National Trust for Historic Preservation ■ Virginia State Historic Preservation Office 	
Response	Thank you.	
Alternatives: Trails		4
Concern Statement		
Comments support a non-motorized trail system within the park that would connect to communities, battlefields, and natural areas outside the park. Some comments expressed a desire for horse trails within the park.		
Representative Quote	<p>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.</p> <p>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 Association, 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.</p>	
Representative Quote	<p>Battlefield properties in Frederick comprise the largest tracts of public and quasi-public lands, and so we are trying to work with groups and organizations to fill a real recreational need in Frederick County.</p> <p>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.</p> <p>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.</p> <p>In the future, if multi-purpose trails are considered as part of this park system, we</p>	

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
Substantive Public Comment Concern and Response Report

	<p>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.</p>	
Commenting Parties	<ul style="list-style-type: none"> ■ Frederick County Equine Network ■ National Trust for Historic Preservation ■ Shenandoah Forum ■ Shenandoah Valley Battlefields Fdn. 	<ul style="list-style-type: none"> ■ Virginia Department of Conservation and Recreation ■ Larry Allamong ■ Michael Kehoe
Response	<p>Thank you for the comments regarding the proposed trail system within the park. The GMP does not contain a provision to include horse trails in the park. The priority at this time is to establish interpretive trails that would link the park's historic resources and allow visitors to follow the course of the battle of Cedar Creek and the historic mill road network. Additionally, the NPS does not anticipate having the financial means to construct and maintain horse trails, nor does the park have the land base necessary to support the trail mileage and trailer parking required for a quality equestrian experience. Nearby Shenandoah National Park, the George Washington National Forest, and Sky Meadows State Park contain opportunities for equestrian trail riders.</p>	
Alternatives: Roads		
5		
Concern Statement		
<p>One comment expresses a desire that roads in the park remain unimproved. Another comment requests that the park not direct visitors to the park's road system until road improvements are made. Finally, one comment suggests that the park seek Virginia scenic byway designation.</p>		
Representative Quote	None	
Commenting Parties	<ul style="list-style-type: none"> ■ Virginia Department of Conservation and Recreation 	<ul style="list-style-type: none"> ■ Larry Allamong ■ David Blount
Response	<p>No new roads or major road improvements are proposed in the GMP. The existing county roads, with U.S. Highway 11 as the main feeder route, would constitute the road system of the park. As the park develops and traffic increases, there may be the need for improvements to some of the park's rural routes. In that case, the NPS would make appropriate recommendations to the county and the Virginia Department of Transportation.</p> <p>The NPS is willing to work with its partners and stakeholders to seek Virginia scenic byway designation at a future date.</p>	
Alternatives: Private Property Rights		
6		
Concern Statement		
<p>Comments state the importance of private property rights within the park and express concern that the GMP infringes upon these rights.</p>		
Representative Quote	<p>The Cedar Creek Battlefield Foundation 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.</p>	

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
Substantive Public Comment Concern and Response Report

Commenting Parties	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation ■ Richard H. Van Norton ■ Walter Jagiello
Response	<p>The GMP reiterates and reaffirms the protections for private property owners contained in Public Law 107-373, the park's enabling legislation. Section 6 of the legislation states that the NPS "may acquire land or interests in land within the boundaries of the Park, from willing sellers only, by donation, purchase with donated or appropriate funds, or exchange." Section 2.3 of the GMP states that "land protection within the park would occur through donation of lands or fee-simple acquisition from willing sellers." Similarly, both the park's enabling legislation and the GMP provide for the donation or purchase of conservation easements from willing sellers. For lands that are not acquired by the park, the legislation authorizes – and the GMP reaffirms – the park to work with private landowners, organizations and businesses "to encourage conservation of historic and natural resources." Private landowners within the park retain the same rights and responsibilities as their counterparts outside the park's legislated boundary, and the GMP does not in any way threaten the property rights of private landowners or nonprofit organizations.</p> <p>The GMP is a collaborative, not compulsory, plan under which the NPS and the Key Partners would work together to make the park successful. The legislated Key Partners provide the foundation for protecting, preserving, and interpreting park resources by virtue of their ownership of significant acreage within the park, their commitment to a shared preservation ethic, their willingness to provide visitor services and public access, and their consent to manage their property as part of the national historical park. The NPS recognizes that the success of the park depends upon private property rights and a shared vision of collaboration with private land owners.</p>
Alternatives: Interpretive Programs 7	
Concern Statement	
<p>One comment expresses concern that NPS interpretive programs would be conducted on key partner property without the permission or invitation of the Key Partner.</p>	
Representative Quote	<p>The interpretative programs to be offered by NPS rangers will add greatly to Cedar Creek and Belle Grove National Historical Park. 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.</p>
Commenting Parties	<ul style="list-style-type: none"> ■ Susan M. Golden
Response	<p>In order for the park to function as an integrated whole in which visitors can visit the historic sites owned and operated by varying Key Partners but still experience the national park as a cohesive whole, the GMP in Section 2.8.5 states that the NPS, Key Partners, and others would develop and implement a coordinated interpretive plan and programs throughout the park. Our mutual goal is to have the Key Partners direct visitors to one another's sites and for park visitors to recognize that that they are within the same national park unit, regardless of which key partner site they are visiting. Section 2.8.1 of the GMP states that NPS rangers would offer interpretive programs and activities at the visitor center, at key partner sites, and at NPS and key partner owned focal areas. It is not the intent of the NPS to provide routine programming at any of the partner sites, and neither the enabling legislation nor the GMP authorizes the NPS to</p>

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
Substantive Public Comment Concern and Response Report

sponsor interpretive programs at key partner or private sites without the agreement of the owner. The GMP intends here to simply state that the NPS would provide assistance to the Key Partners in the form of public programming and interpretive media. We are modifying the language in Chapters 1 and 2 of the GMP to make clear that interpretation would be given only at the mutual request or agreement of the landowner.

To meet the legislative mandate of interpreting the full span of Shenandoah Valley history, seven primary interpretive themes have been proposed in the GMP (see Section 1.6.4). These themes relate directly to the park's purpose and significance and connect the fundamental resources and values that contribute to the park's significance with relevant ideas, meanings, concepts, contexts, beliefs, and values. The Key Partners are encouraged to interpret these themes on their individual properties, with assistance from the NPS, with an emphasis on their particular resource or area of expertise.

Alternatives: National Historic District

8

Concern Statement

Comments support Alternative D as the alternative that best integrates Cedar Creek and Belle Grove National Historical Park into the Shenandoah Valley Battlefields National Historic District. Furthermore, these comments support the concept of an NPS visitor center that would orient visitors to the park and to the larger National Historic District.

Commenting Parties

- Civil War Preservation Trust
- Shenandoah Valley Battlefields Fdn.
- Preserve Frederick

Response

Thank you.

Alternatives: NPS Presence

9

Concern Statement

Comments support a strong NPS presence and role at the park so that the agency is better able to provide technical assistance, interpretation, and resource protection.

Representative Quote

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.

Commenting Parties

- Shenandoah Valley Battlefields Fdn.
- Barbara Adamson
- Virginia State Historic Preservation Office
- Michael Kehoe

Response

Thank you.

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
 Substantive Public Comment Concern and Response Report

Alternatives: Livestock		10
Concern Statement		
Comments support the continued pasturing of livestock within the park. These comments state that pasturing livestock is an historical activity in this region and has many benefits.		
Commenting Parties		
<ul style="list-style-type: none"> ■ Cedar Creek Battlefields Foundation ■ Michael Kehoe 		
Response		
The GMP has been modified in Section 2.2.4 to state that consideration would be given to removing or not introducing livestock into areas where the goals are protecting native plants, preventing the introduction of exotic species, and improving water quality. Hundreds of acres within the park, including the fields around Belle Grove and the Heater House, are planted in fescue and other common grasses. These areas are entirely appropriate for pasturing livestock. Areas within the Sensitive Resource Zone, where the goal is the protection of native species, would not be appropriate for pasturing livestock.		
Alternatives: Bicycling		11
Concern Statement		
One comment noted the importance of bicycle use within the park as an alternative means of transportation.		
Representative Quote		
<p>I think this park is esp. (sic) well-suited to make use of bicycle and pedestrian modes of transportation, reducing the dependency on 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>		
Commenting Parties		
<ul style="list-style-type: none"> ■ Private Citizen (anonymous) 		
Response		
Consideration would be given to allowing bicycle use on the non-motorized trail system that would be developed in the park. In addition, the low-speed, rural roads within the park are well-suited for bicycle use.		

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
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Alternatives: Artifacts		12
Concern Statement		
Comments express concern that NPS would take ownership of artifacts found within the park regardless of the owner upon whose land they are found.		
Representative Quote	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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation ■ Susan M. Golden 	
Response	Although this issue is not addressed in the park's enabling legislation, the same concept applies here as with other private property. Artifacts excavated on privately-owned or non-profit-owned land would remain the property of the ownership entity. In 1983 the Secretary of the Interior developed Standards and Guidelines for Archeology and Historic Preservation. These standards would be used by the NPS to provide technical assistance to private and nonprofit landowners on the preservation of archeological and historic artifacts but the artifacts would remain the property of the ownership entity. The paragraph on museum collections in Section 1.9.1 of the GMP has been modified to clarify this point.	
Alternatives: External Threats		13
Concern Statement		
Comments express concern about external threats to the park, particularly from commercial and residential development, an adjacent limestone mine, and the proposed expansion of Interstate 81. Commenters believe that, of the alternatives considered in the GMP, the land protection strategy in Alternative D would best protect the park from these threats.		
Representative Quote	Finally, the Civil War Preservation Trust 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 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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Civil War Preservation Trust ■ National Parks Conservation Assoc. ■ Preserve Frederick ■ Shenandoah Valley Network ■ Barbara Adamson 	
Response	The NPS and the Key Partners would address external threats by collaborating with park stakeholders, coordinating land protection efforts, and providing technical assistance to surrounding communities. See Sections 2.3 and 2.8.10 of the GMP.	

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
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Facilities: NPS Visitor Center		14
Concern Statement		
Comments support an NPS developed and managed visitor center for the park. Commenters feel that such a visitor center would serve as a central hub to orient visitors to the park and the National Historic District, support educational programs, provide economic benefits to surrounding communities, and address the interpretive themes proposed in the plan.		
Representative Quote	<p>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).</p> <p>In addition, the interpretive, educational, research, and conservation programs that would be possible with this center will provide opportunities for visitors and residents to learn about and grow more mindful of our region's important historic, cultural, and natural resources.</p>	
Representative Quote	<p>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.</p>	
Commenting Parties	<ul style="list-style-type: none"> ■ Belle Grove, Inc. ■ Civil War Preservation Trust ■ National Trust for Historic Preservation ■ Park Advisory Commission ■ Shenandoah Forum ■ Shenandoah Valley Battlefields Fdn. ■ Virginia State Historic Preservation Office 	
Response	Thank you.	
Facilities: Existing Structures		15
Concern Statement		
Comments express an interest in exploring opportunities to adaptively reuse an existing historic structure to serve as the park visitor center.		
Commenting Parties	<ul style="list-style-type: none"> ■ Belle Grove, Inc. ■ National Trust for Historic Preservation ■ Virginia State Historic Preservation Office ■ Barbara Adamson 	
Response	<p>Alternative D in the GMP states, "Re-use of an existing structure to serve as a park visitor center has not been ruled out, but at this time a suitable facility has not been found." The NPS would consider the use of an existing structure, whether historic or contemporary, if it meets the criteria for a park visitor center outlined in Section 2.8.6 of the GMP.</p>	

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Facilities: Visitor Contact Facilities		16
Concern Statement		
Comments oppose the use of the term "visitor contact facility" to describe key partner facilities and imply the term is demeaning or connotes a facility of lesser importance. One comment supports the use of the term "visitor contact facility".		
Commenting Parties	<ul style="list-style-type: none"> ■ Belle Grove, Inc. ■ Cedar Creek Battlefield Fdn. 	<ul style="list-style-type: none"> ■ Susan M. Golden
Response	The term "visitor center" comes with public expectations about staffing, services, and scope of interpretation. The GMP uses the term "visitor center" to describe a central facility that would orient visitors to the park and the National Historic District, tie the park together with a unified message, and provide a venue where all of the park's themes would be interpreted. The term "visitor contact facility" is used in the GMP to describe a facility where a limited number of themes are interpreted, and would likely be associated with one of the historic sites found within the park; it may also be physically smaller. "Visitor contact facility" is used to highlight the differences in function when compared to the proposed visitor center, not to imply lesser importance. The preferred alternative (Alternative D) proposes an NPS visitor center that would serve as a central hub providing overall orientation to the park and its themes, with separate key partner facilities that focus on a narrower span of history and fewer park resources.	
Historic Resources		17
Concern Statement		
Comments support the interpretation of the full span of history.		
Representative Quote	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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Belle Grove, Inc. 	<ul style="list-style-type: none"> ■ Barbara Adamson
Response	The primary interpretive themes (see GMP Section 1.6.4) proposed for the park would capture the full span of history from prehistoric Americans to post Civil War life.	
Impact Analysis: Key Partners		18
Concern Statement		
One of the Key Partners objects to the environmental analysis of the annual reenactment contained within the GMP and believes that their organization is better able to evaluate and judge the impacts associated with the hosting of battle reenactments than is the NPS.		
Representative Quote	Page 2-47 2-9 User Capacity – The Cedar Creek Battlefield Foundation (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	

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	<p>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.</p>
<p>Commenting Parties</p>	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation
<p>Response</p>	<p>In addition to being a General Management Plan, the planning document is also an Environmental Impact Statement (EIS). As an EIS the plan must describe the environmental impact of those activities that the NPS would undertake and would support others in undertaking. The park’s enabling legislation states that the annual reenactment may continue within the national park, and Alternative D proposes the continuation of the annual reenactment. But because NPS is proposing the continuation of the reenactment as part of its management plan, we are obligated to conduct an environmental analysis of its impacts. The analysis contained within the GMP was conducted by natural and cultural resource specialists and it fairly describes the likely impacts on the park’s cultural and natural resources. The sentence referenced in the representative quote has been change to read, “The NPS would work in consultation with the Key Partners to determine what level of impact is acceptable and what actions are needed to keep impacts within acceptable limits, with the final determination being made by the landowner.”</p>
<p>Lands: General 19</p>	
<p>Concern Statement Comments support the land protection goals established in Alternative D.</p>	
<p>Representative Quote</p>	<p>The Civil War Preservation Trust 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.</p>
<p>Commenting Parties</p>	<ul style="list-style-type: none"> ■ Civil War Preservation Trust ■ Park Advisory Commission
<p>Response</p>	<p>Thank you.</p>

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Lands: Support for Collaboration		20
Concern Statement Comments support collaboration on land protection among the NPS and the Key Partners.		
Representative Quote	The Park Federal Advisory Commission 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 the 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 Commission 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.	
Representative Quote	The Park Federal Advisory Commission 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	
Commenting Parties	<ul style="list-style-type: none"> ■ Civil War Preservation Trust ■ Park Advisory Commission 	
Response	Thank you. Collaboration is a key aspect of the land protection component of the GMP.	
Lands: Opposition to Collaboration		21
Concern Statement Comments express concern that the Key Partners would be required to contribute funds toward NPS land acquisition efforts.		
Representative Quote	Page 1-3 Land Protection – As is the case with the other Key Partners, the Cedar Creek Battlefield Foundation (CCBF) intends to continue its preservations 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.	
Representative Quote	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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation ■ Susan M. Golden 	
Response	As stated in the GMP, Section 2.3, "The NPS and the Key Partners would acquire land and interests in land as opportunities arise and funding allows." Furthermore, the preferred alternative (Alternative D) states, "The NPS and Key Partners would work together to acquire lands and funding for their purchase would be a collaborative effort." Nowhere is it stated in the park's enabling legislation or in the GMP that the Key Partners would be required to contribute money to the NPS. Section 1.4 of the GMP has	

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	<p>been modified to make this clear.</p> <p>Section 2.3 of the GMP proposes the establishment of a friends group that would assist the park with resource protection, volunteer services, land acquisition, and fundraising. The NPS has worked with cooperating associations and friends groups since 1923 and these groups have provided many benefits to national parks including raising funds for programs, facilities, land acquisition, and operations. There are 391 individual units within the national park system, and there is recognition by Congress, the donor community, and the general public that national parks cannot exclusively rely upon congressionally appropriated dollars to fund our preservation mission. Friends groups can only be established and operated through contractual agreements with the NPS and they are always voluntary. The GMP does not propose that the Key Partners serve as the park's friends group; rather, the GMP proposes that the park establish a friends group separate and apart from the Key Partners. These fundraising activities were clearly anticipated in the park's enabling legislation; Section 11 of the legislation gives the national park the authority to "receive and expend funds from an endowment." These endowments would be funded through donations voluntarily contributed by private business, organizations and individuals.</p>
<p>Large Events and Reenactments: General 22</p>	
<p>Concern Statement Comments express concern about the possibility that the NPS would curtail or limit battle reenactments and other large events that occur within the park.</p>	
<p>Representative Quote</p>	<p>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.</p>
<p>Representative Quote</p>	<p>The annual Cedar Creek Re enactment (sic) 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 outweighs any possible scar which may exist because of its use.</p>
<p>Commenting Parties</p>	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation ■ Richard H. Van Norton ■ Walter Jagiello
<p>Response</p>	<p>Section 13 of the park's enabling legislation states that the Cedar Creek Battlefield Foundation may "continue to conduct reenactments and other events within the Park." In Section 2.4, the GMP proposes a Large Events Zone that seeks to ensure that the reenactment and other large events continue at the park. The zone prescriptions serve two purposes: they describe how the area would be managed should it become the property of the NPS and how the NPS would encourage others to manage it should it remain privately owned. This zone, which is owned and/or managed by three different key partner organizations, includes all of the open fields in the vicinity of the Heater House and Belle Grove Plantation and is identical to the area that has traditionally been</p>

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used by the Key Partners for battle reenactments and other large events. By designating this area as a Large Events Zone, the NPS is saying that it would support the Key Partners in managing these fields in such a manner that large public events can take place at this location. The NPS, in implementing the GMP and providing technical assistance, would encourage the Key Partners to manage this zone to serve large numbers of visitors for relatively short time periods, while ensuring that such events do not impair park resources.

Large Events and Reenactments: Activities

23

Concern Statement

One comment expresses concern that the GMP describes the battle reenactments as a negative activity. One comment states that there is no evidence to support the conclusion that battle reenactments cause resource impacts.

Representative Quote

Throughout the draft GMP, the reenactments provided by the Cedar Creek Battlefield Foundation (CCBF) are characterized as a negative activity rather than 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.

Representative Quote

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.

Commenting Parties

- Cedar Creek Battlefield Foundation

Response

As an Environmental Impact Statement, the GMP must analyze the impact of activities on the environment; there is no question that this and all large events can have impacts on natural and cultural resources. The reenactment is also an interpretive activity, and as such provides an opportunity to educate the visiting public. Section 2.4 of the GMP has been modified to highlight some of the educational and interpretive benefits of the battle reenactments.

The impacts to soils, vegetation, and archeological resources from large events are well documented in Chapter 4 of the GMP and supported by empirical evidence. Nevertheless, these impacts are likely to be minimized under Alternative D because the NPS and Key Partners would collaborate to develop proactive strategies for resource preservation.

Large Events and Reenactments: Collaboration

24

Concern Statement

One comment expresses opposition to the concept that the Key Partners would collaborate on evaluating the appropriateness of special events and identifying measures to help protect park resources.

Representative Quote

Page 2-49 – The Cedar Creek Battlefield Foundation (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

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	<p>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.</p>
Commenting Parties	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation
Response	<p>The large events zone proposed in Section 2.4 of the GMP is not intended for the sole use of the property owners within that zone, the Cedar Creek Battlefield Foundation, and the National Trust for Historic Preservation. Rather, the zone would accommodate all large events that would be held within the park, regardless of the sponsoring organization or entity. Therefore, as partners in managing the park, it would be imperative for the NPS and Key Partners to work together to evaluate the appropriateness of all such events and develop strategies for minimizing their impact to natural and cultural resources. Some events proposed for the park may not be appropriate or perhaps should only occur under certain conditions. The NPS and the Key Partners must develop a process for making these determinations, using the GMP as a guide.</p>
Mitigation Measures: General	
25	
Concern Statement	
One comment supports mitigation measures for any construction activities to be undertaken within the park.	
Representative Quote	<p>During any construction activities, impacts to resources should be avoided and minimized. In addition, activities under this action should comply with all appropriate stated 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.</p>
Commenting Parties	<ul style="list-style-type: none"> ■ U.S. Environmental Protection Agency, Region III
Response	<p>Thank you. The mitigation measures are fully documented in Section 2.11 of the GMP.</p>
Mitigation Measures: General	
26	
Concern Statement	
Comments support the management zones as a way to ensure protection of park resources.	
Representative Quote	<p>The Shenandoah Forum also supports the Management Zones concept as a way to ensure the 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.</p>
Commenting Parties	<ul style="list-style-type: none"> ■ National Parks Conservation Assoc. ■ Park Advisory Commission ■ Shenandoah Forum ■ Shenandoah Valley Network ■ Virginia State Historic Preservation Office
Response	<p>Thank you.</p>

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Management Zones: Support for Sensitive Resource Zones		27
Concern Statement		
Comments support the Sensitive Resource Zone as a means to ensure protection of the park's rare species and stream habitat and to educate the visitor about the importance of resource protection.		
Representative Quote	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.	
Representative Quote	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 (300 ft 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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Shenandoah Forum ■ Trout Unlimited ■ Shenandoah Valley Network 	
Response	Thank you.	
Management Zones: Opposition to Sensitive Resource Zones		28
Concern Statement		
One comment opposes the Sensitive Resource Zone designation and questions the basis for the designation.		
Representative Quote	The Cedar Creek Battlefield Foundation (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 basis 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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation 	
Response	The Sensitive Resource Zone was designed in consultation with the Virginia Department of Game and Inland Fisheries, the Virginia Department of Conservation and Recreation, and Shenandoah University. Several species of management concern and their habitats, along with a unique plant assemblage, a rare geologic formation, and a significant cave were identified by these organizations (see Appendix D, Compliance Coordination). These resources lie within the Cedar Creek Battlefield Foundation's Panther Cave	

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property and the Keister site owned by Shenandoah County, as well as along Meadow Brook, Cedar Creek, and the North Fork of the Shenandoah River. The Sensitive Resource Zone is designed to protect these critical natural resources as well as significant historical resources, including original XIX Corps Civil War earthworks. The zone designation connotes that should these areas be acquired by the NPS in the future, they would be managed to protect sensitive natural and cultural resources; and should this land remain in private hands, the NPS would encourage private and nonprofit landowners, through technical assistance, to protect these resources. The NPS and Key Partners would collaborate within this zone to protect, stabilize, and restore functioning natural communities while still providing for visitor use and enjoyment of the areas. For example, the NPS is currently seeking project funding to study these sensitive resources in more detail to determine how they can be best protected.

The state has obtained baseline information on the sensitive natural resources from studies conducted by their staff biologists and Shenandoah University. The specific zone polygons and lines were determined through maps provided by the state combined with their request that the park provide a protective buffer around sensitive riparian areas. The zone designation and prescriptions were vetted and refined by the park's Federal Advisory Commission during several public meetings. The specific zone prescriptions or appropriate types of use and management are found in Section 2.4, Table 2.3 of the GMP.

Management Zones: Large Events Zone

29

Concern Statement

One comment supports the large events zone designation, stating that the zone provides ample space for battle reenactments and other large events.

Commenting Parties

- Shenandoah Valley Network

Response

Thank you.

Management Zones: Private Property Rights

30

Concern Statement

One comment expresses concern that the management zones appear to represent a taking of private property rights.

Representative Quote

Cedar Creek Battlefield Foundation (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.

Commenting Parties

- Cedar Creek Battlefield Foundation

Response

Management zones are the major tool that the park has of conveying to the public how it intends to manage an area, should it ever be owned by the NPS and how the NPS would support others in its management, should it remain in private property. As described in Section 2.4 of the GMP, management zones are used by the NPS to identify and describe how natural and cultural resources would be managed within an area and what types of visitor activities would be encouraged in those areas. The management zones are not regulatory or compulsory, but rather represent a shared vision among the

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NPS and the Key Partners about how different areas within the national park would be managed. At the foundation of these zones is the identification of natural and cultural resources that warrant protection within an area, and determining what activities would be consistent with the protection of those resources. In partnership parks, such as Cedar Creek and Belle Grove National Historical Park, where the NPS and its partners are making management decisions, the management zones provide the basis for compatible facility development by the partners, evolution of an efficient circulation system, and general coordination of plans and activities. Management zones also help local governments make growth management decisions that support preservation of park resources and that are compatible with long-term plans for development of park facilities (such as road improvements and utility systems).

Natural Resources: Riparian Habitat

31

Concern Statement

Extensive comments were received expressing the importance of riparian or stream habitat within the park, particularly along the Shenandoah River, Cedar Creek, and Meadow Brook. These comments outline the particular species of concern that live within these water courses and express the importance of protecting these species and restoring their habitat.

Representative Quote

The Cedar Creek and Belle Grove National Historical Park 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.

Commenting Parties

- Virginia Department of Conservation and Recreation
- Trout Unlimited

Response

Thank you for the updated information on riparian species and habitat. Riparian habitat along the Shenandoah River, Cedar Creek, and Meadow Brook lies within the proposed Sensitive Resource Zone (see Section 2.4 of the GMP). The NPS would work with the State of Virginia, private land owners, and other stakeholders to protect these important species and habitats.

Natural Resources: Panther Conservation Site

32

Concern Statement

One comment expresses the importance of the state-designated Panther Conservation Site that lies within the boundaries of the park and is on land owned by one of the Key Partners. This site contains rare species, high biodiversity, a unique plant association, and a significant cave.

Representative Quote

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

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	<p>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> <ul style="list-style-type: none"> - Montane Dry Calcareous Forest/Woodland GNR/SNR/NL/NL - Canby's mountain-lover <i>Paxistima canbyi</i> G2/S2/SOC/NL <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 Significant Cave G3/SNR/NL/NL.</p>
<p>Representative Quote</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 priceii</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>Commenting Parties</p>	<ul style="list-style-type: none"> ■ Virginia Department of Conservation and Recreation
<p>Response</p>	<p>Thank you for the updated information on the Panther Conservation Site. The site lies entirely within the sensitive resource zone (see Section 2.4 of the GMP) that is designed to protect such rare and significant resources. The NPS would work with the Cedar Creek Battlefield Foundation, owner of the property, to further delineate and protect these species and their habitats.</p>

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Natural Resources: Protected Species		33
Concern Statement		
Extensive comments, received from the Commonwealth of Virginia, detail the protected species of plants and animals that live within the park and express the importance of preserving these species.		
Representative Quote	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 Virginia Department of Game and Inland Fisheries (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.	
Representative Quote	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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Virginia Department of Conservation and Recreation 	
Response	Thank you for the updated information regarding protected species within the park. All the species outlined in the letter from the Commonwealth of Virginia lie within the sensitive resource zone which is designed to provide protection for these rare and significant resources.	
Park Boundary: General		34
Concern Statement		
Comments request that the NPS conduct a full boundary study to help protect related resources outside the park boundary.		
Representative Quote	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.	
Representative Quote	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." Shenandoah Valley Battlefield Foundation encourages the Commission to consider identifying these sites in advance of the pending boundary study in order to facilitate the study's work.	
Commenting Parties	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation ■ Civil War Preservation Trust ■ National Parks Conservation Assoc. ■ Shenandoah Valley Battlefields Fdn. ■ Shenandoah Valley Network 	
Response	As of the writing of this GMP, about one-third of the land within the park's legislated boundary is protected from commercial and residential development by the NPS and the Key Partners. There are currently over 2,000 acres within the park that are not	

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	<p>protected and could potentially be subdivided and developed or subject to other resource threats. At this time, the priority of the NPS is to protect these potentially threatened lands within the park boundary, provide technical assistance to the Key Partners and surrounding communities, and work with various stakeholders to preserve natural and historic resources in and around the park.</p> <p>A boundary study would be completed in the future, but the focus of the GMP is on protecting and preserving resources within the current legislated park boundary.</p>
Park Boundary: Battlefield Core Area 35	
Concern Statement Comments request that the NPS conduct a boundary study that would ultimately include the entire Battle of Cedar Creek core area within the boundaries of the park.	
Representative Quote	<p>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.</p> <p>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.</p>
Commenting Parties	<ul style="list-style-type: none"> ■ Civil War Preservation Trust ■ Preserve Frederick ■ Shenandoah Forum ■ Shenandoah Valley Battlefields Fdn. ■ Shenandoah Valley Network
Response	<p>The core area of Cedar Creek Battlefield contains approximately 6,250 acres and the study area for the battlefield contains approximately 15,600 acres. The park's legislated boundary contains approximately 3,700 acres. The enabling legislation also refers to the identification of sites of significance outside the park boundary necessary to fulfill the purposes of the Act. When conducting such a study, NPS fully anticipates the discovery of historic sites of sufficient national significance to be considered for inclusion in the national park, but that does not mean that the park's boundary would be expanded to include those resources. In addition to historical significance there are other criteria that factor into the determination of a national park's boundary, including the suitability and feasibility of adding the sites. Most national park units that preserve battlefields do not preserve the entire core or study areas. There are many reasons for this. In considering the feasibility of including additional land within a park boundary such factors as landownership, staffing requirements, and the cost associated with acquiring, developing, restoring, and operating the additional land are considered. Currently a small percentage of the 3,700 acres within the existing park boundary are protected by the NPS. Funding is a major reason for this. It is a high priority to protect the resources contained within the park's current legislated boundary. Even if the park's</p>

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
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legislated boundary is not expanded, the Key Partners are not prevented from preserving and acquiring land outside of the park's legislated boundary.	
Park Boundary: Buffer Zone	
36	
Concern Statement	
One comment requests that a protective buffer zone be created along the boundary of the park.	
Representative Quote	The Civil War Preservation Trust 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.
Commenting Parties	<ul style="list-style-type: none"> ■ Civil War Preservation Trust
Response	The enabling legislation authorizes NPS to acquire conservation easements adjacent to the park from willing sellers for the purpose of "protecting the scenic, natural, and historic resources on adjacent lands and preserving the natural or historic setting of the park when viewed from within or outside the park." Additionally, the NPS and the Key Partners would work in close collaboration to protect the park's viewshed and related resources in proximity to the park, a feature of all of the GMP action alternatives (see Sections 2.3, 2.8.9, and 2.8.10).
Partnerships: General	
37	
Concern Statement	
Comments support strong partnerships and collaboration to ensure the success of the park.	
Representative Quote	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 visitor's enjoyment;
Representative Quote	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.
Commenting Parties	<ul style="list-style-type: none"> ■ Belle Grove, Inc. ■ Virginia Department of Conservation and Recreation ■ National Trust for Historic Preservation ■ Park Advisory Commission ■ Town of Strasburg Town Council ■ Trout Unlimited ■ David Blount ■ Joan Harding
Response	Thank you.

Table F.2 Cedar Creek and Belle Grove National Historical Park GMP/EIS
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Partnerships: Key Partner Autonomy		38
Concern Statement		
Comments support each Key Partner maintaining its autonomy and organizational identity.		
Representative Quote	Cedar Creek Battlefield Foundation 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.	
Representative Quote	Although the intent of the Cedar Creek and Belle Grove National Historical Park 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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Cedar Creek Battlefield Foundation ■ Susan M. Golden 	
Response	As outlined in the park's enabling legislation and Section 1.5.6 of the GMP, each Key Partner – Belle Grove Inc., the Cedar Creek Battlefield Foundation, the National Trust for Historic Preservation, Shenandoah County, and the Shenandoah Valley Battlefields Foundation – would continue to own, operate, and manage its lands as an autonomous organization. In the GMP, the NPS stresses the collaborative nature of the relationship between the NPS and the independently-managed key partner organizations.	
Partnerships: Other Stakeholders		39
Concern Statement		
Comments express concern that the plan underemphasizes the importance and potential contributions of partnerships outside of those with the five legislated Key Partners and surrounding local governments (community partners).		
Representative Quote	<p>ENGAGING MANY PARTNERS AND TAPPING DIVERSE RESOURCES</p> <p>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>	
Commenting Parties	<ul style="list-style-type: none"> ■ Civil War Preservation Trust ■ Virginia Department of Conservation and Recreation ■ National Parks Conservation Assoc. ■ Trout Unlimited 	
Response	Thank you for your comment regarding other partnerships. The GMP has been modified in Chapters 1 and 2 to acknowledge the importance of partnerships with other organizations in addition to the Key Partners.	

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Partnerships: Formal Relationships		40
Concern Statement		
Comments support the creation of more formal relationships and agreements between the NPS and the five Key Partners to strengthen collaboration and outline their roles in managing the park.		
Representative Quote	As set forth in alternative D, the Federal Advisory Commission (FAC) supports a strong partnership between park partners, the NPS, landowners within the park, and public entities represented on the FAC. The FAC recommends that the NPS and the 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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Park Advisory Commission ■ Shenandoah Valley Battlefields Fdn. ■ David Blount 	
Response	Thank you. Formal relationships between the NPS and the Key Partners are an element of Alternative D, the preferred alternative. These relationships would likely be formalized through written, cooperative agreements.	
Technical Assistance: General		41
Concern Statement		
Comments support the concept of technical assistance on a range of issues by and among the NPS and the Key Partners.		
Representative Quote	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.	
Commenting Parties	<ul style="list-style-type: none"> ■ Park Advisory Commission ■ Preserve Frederick ■ Shenandoah Forum 	
Response	Thank you.	

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Technical Assistance: General		42
Concern Statement		
<p>Comments support the incorporation of the GMP into the comprehensive plans of the surrounding communities. Additionally, comments support the provision of technical assistance for the management of the National Historic District.</p>		
Commenting Parties	<ul style="list-style-type: none"> ■ Shenandoah Forum ■ Shenandoah Valley Battlefields Fdn. 	
Response	<p>After the GMP is finalized, the NPS would approach the surrounding towns and counties with a request that they incorporate the document into their comprehensive plans.</p> <p>Under Alternative D, the NPS would provide technical assistance to the Shenandoah Valley Battlefields Foundation on issues related to the park.</p>	