FINDING OF NO SIGNIFICANT IMPACT

Management Plan/Environmental Assessment
For
The Fort Circle Parks
Washington, D.C.

The National Park Service (NPS) proposes to implement a management plan/environmental assessment for the management, development, and interpretation of the Fort Circle Parks. Three Washington, D.C., area parks – Rock Creek Park, National Capital Parks-East, and George Washington Memorial Parkway contain Civil War earthworks collectively known as the "Fort Circle Parks" (FCP). Originally, these earthworks were to have been connected by a Fort Circle Drive that was begun, but never completed. The importance of these historic earthworks and the greenbelt of parks situated along the ridge surrounding the city make this a significant open-space element in the nation's capital.

Since the FCP are managed by three units of the National Park System; maintenance, interpretation, and facilities vary among units. This plan was developed to help guide management and development and to provide a consistent philosophy for all the fort sites and their connecting green spaces.

PREFERRED ALTERNATIVE

Following agency and public review, a determination was made to combine alternatives 2 and 3 to form a preferred alternative. These alternatives were not mutually exclusive and the benefits of combining the recreational opportunities of alternative 2 with the interpretive and preservation goals of alternative 3 were deemed to be the best course of action.

The new preferred alternative contains both recreational and cultural resource preservation components:

- The name, "Fort Circle Parks" would be changed to place more emphasis upon the importance of the events that occurred here during the Civil War. The plan suggested "Civil War Defenses of Washington." During public review the name "Civil War Fort Circle Parks" was suggested to accomplish the same goal while retaining the "Fort Circle Parks" which,

over the years, has become an important Washington, D.C. place-name. Further deliberations will be required prior to a name change.

- The focus for managing the cultural resources in the FCP would be on the national significance of the battle of Fort Stevens and the ring of forts and batteries that protected the city during the Civil War. Other foci would be on the communities and neighborhoods that developed around the fort sites, on the activities of the Civilian Conservation Corps (CCC) at various sites during the 1930s, the McMillan Plan, and early 20th century city planning and parks/parkway design concepts.

- Preservation actions for historic resources would include stabilizing and preserving earthworks in keeping with NPS preservation standards; erosion control; vegetation management; and restoring the CCC reconstruction at Fort Stevens.

- A small year-round visitor contact facility would be developed in the vicinity of Fort Stevens to provide a focal point for the system offering orientation and interpretation, and serving as the start of a driving tour of the forts. The activity center at Fort Dupont would be redeveloped into an education center to focus on school and community groups offering cultural, historical, natural and environmental programming.

- Natural resources would be managed to maintain the greenbelt around the city for its natural, cultural, and scenic values. Preservation actions would include emphasizing the removal of exotic vegetation to ensure habitat for native plant and animal species, retaining the forest canopy over earthworks, and surveying and monitoring park boundaries to prevent encroachments. Other preservation actions would be taking steps to eliminate illegal dumping, managing stormwater, controlling erosion, and monitoring adjacent land use and zoning to protect park resources. Recreational improvements in areas zoned "natural" would be designed to ensure that adverse impacts on natural resources would be avoided or minimized. Improvements would be developed to take advantage of the latest available natural resources information.

- Opportunities to correct stormwater impacts from non-park sources would be sought and implemented, and feasible environmental enhancements

would be undertaken. These actions would improve opportunities for interpreting natural resources.

- Existing services such as restrooms and parking lots would be improved to raise the quality of the visitor experience. The three superintendents would make a coordinated effort to develop a park logo and to purchase similar signs, site furniture, and interpretive materials as a way to make the FCP more visible, provide a unified image, and let visitors know when they are in the FCP.

- Existing recreational opportunities and facilities would be improved where needed. Such improvements would include rehabilitating selected ball fields; basketball and tennis courts; picnic areas; and other existing facilities as needed as well as careful evaluation of additional facilities as they are proposed.

- A new trail, linking most of the fort sites and the connecting green corridor of the FCP system, would be designated. This would require a separate planning effort in consultation with the District of Columbia and other governmental and private organizations to develop a route. The trail is proposed to extend the entire 23 miles. Existing trail segments would be used, as would city sidewalks, with some minor construction within the FCP to connect existing trail segments. Appropriate signs would be placed along the greenbelt corridor, connecting most of the fort sites. Existing bicycle use of the trail between Fort Mahan and Fort Stanton would continue, but the rest of the trail would be primarily for walking only because of the alternating urban and rustic nature of existing trails and the environmental damage and aesthetic changes such a combination trail would cause. Where possible, this new trail would also include bicycle access as long as cultural and natural resources are sufficiently protected.

- Along the trail route would be some areas where sidewalk would need to be replaced or constructed, where push-button streetlights would have to be installed to allow visitors to cross busy streets safely, and where bridges would be necessary to cross long expanse of water, such as the Anacostia River or parkways, such as the Suitland Parkway. Such locations would be identified and appropriate measures taken following completion of the separate trail study described above.

- A brochure would be issued to cover the trail route. Interpretive and directional signs would be placed at appropriate intersections to guide users and to explain the historic communications and supply uses of the original connecting corridor between fort sites. Opportunities for traditionally passive forms of recreation, such as bird watching and nature walks, would also be enhanced by the trail improvements and through interpretation.

- The trail route along the Shepherd Parkway section would be primarily along city sidewalks to avoid impacts of a new trail in narrow wooded corridors and to avoid important wildlife areas.

- Additional law enforcement patrols would be required to help ensure a safe visit for park users and additional maintenance and interpretive staff would be required to maintain and provide visitor services.

- Funding and staffing would continue to be maintained by each respective park. However, both funding and staffing would be coordinated among the parks to ensure that the level of maintenance, facilities, and recreational opportunities would be similar across park boundaries and that the visitor experience would be seamless regardless of park boundaries.

ALTERNATIVES CONSIDERED

The environmental assessment analyzed three alternatives including a no action alternative.

The "no action" (status quo) alternative proposes no new facilities, mostly self-guided interpretation, and leaves many of the earthworks untreated.

Alternative 2 would focus on improving local and regional visitor experience compatible with the protection of significant cultural and natural resources in the FCP. This would be accomplished primarily by designating a trail throughout the 23-mile length of the parks. Existing recreational facilities would be rehabilitated to ensure continued use.

Alternative 3 would focus on the story of the Civil War Defenses of Washington, with emphasis on the battle of Fort Stevens in Rock Creek Park. Three sites would be designated as key locations for orientation and information: Fort Marcy

(George Washington Memorial Parkway), Fort Stevens, and Fort Dupont Park (National Capital Parks-East). A continuous trail would not be included. Significant natural and cultural resources would be protected and existing recreational facilities would be rehabilitated to ensure continued use.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA), which is guided by the Council on Environmental Quality (CEQ). The CEQ provides direction that "the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.
2. Assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings.
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.
4. Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.
5. Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

After careful review of potential resource and visitor impacts to natural and cultural resources, the preferred alternative (combined alternatives 2 and 3) is the environmentally preferred alternative. This alternative best strikes the balance between preservation of cultural and natural resources while promoting the FCP for visitor use.

As a combination of alternatives 2 and 3, the preferred alternative would best achieve criteria 2, 3, 4, and 5 as a result of improved interpretation, recreational opportunities, and resource protection. Adverse impacts associated with combining the two alternatives are generally negligible to minor, or short term, and therefore have limited influence on achieving the above criteria.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR section1508.27, significance is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an Environmental Impact Statement (EIS): No major beneficial or adverse impacts were identified that would require analysis in an EIS.

Beneficial impacts on cultural resources would include improving the protection and preservation of the earthworks and fort sites through stabilization and vegetation management.

Minor adverse impacts would result from constructing segments of a walking trail and vegetation management at the fort sites. The impacts would occur over the long term through the loss of vegetation and the possible compaction of soils. Impacts from trail construction on wildlife and water resources would be negligible. In reviewing impact levels, trail construction and the removal of trees would result in moderate, short-term localized adverse noise and emissions impacts. Impacts are anticipated to be moderate due to the urban environment and associated existing noise levels.

Long-term benefits to the visitor experience would result from improving facilities, expanding interpretive programs, establishing a walking trail, and increasing accessibility and safety. These enhancements would result in increased visitation.

The preferred alternative would have minor beneficial effects on the economy and the lifestyle of local businesses and residents. There would be a minor increase in traffic and noise levels during periods of heavy visitation. Changes to land use would be negligible.

The preferred alternative would raise the visibility of the FCP, which would necessitate a consequent increase in staffing. Although no new buildings would be built, completing a walking trail of about 23 miles would greatly improve access and visitation. Cooperation between Rock Creek Park and National Capital Parks-East would be necessary to focus the necessary attention on the resources of the FCP. An increased NPS presence at the earthworks, either by interpretive,

maintenance, or protective staff, would encourage use of each site by neighbors. Economic benefits to the communities surrounding each site would be minor to negligible.

Degree of effect on public health or safety: During construction activities all possible measures to decrease possible air pollution would be taken. The NPS would work with the City of Washington to provide safe street crossings, signs, sidewalks, etc. where necessary to ensure the safety of all users. Increased patrolling by NPS staff and more use of the trails in the FCP should make the area safer for all visitors.

Degree of effect on unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas: No actions in the preferred alternative would jeopardize the status of historic or cultural resources or cause their removal from the National Park System or from the National Register of Historic Places.

The FCP encompass the heights within the city, many watercourses originate here. Fort Circle also provides the largest expanses of green natural areas within the District and supports a wide variety of wildlife. Implementation of the preferred alternative will not result in a reduction of the integrity of any of these resources.

The trail will be designed to avoid any conflicts with nesting bald eagles in the vicinity of Shepherd Parkway (no trail construction will occur in this stretch--city sidewalks will be designated as trail) or amphipods within Rock Creek Park, Fort Mahan, and elsewhere along the trail route (trail will be rerouted to avoid any impact.)

Degree to which effects on the quality of the human environment are likely to be highly controversial: There were no highly controversial effects identified during either preparation of the environmental assessment/assessment of effect or the public review period.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks: There were no highly uncertain, unique or unknown risks identified during either preparation of the environmental assessment/assessment of effect, or the public review period.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration: The preferred alternative neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts

In determining whether there are cumulative impacts that will occur as a result of the preferred alternative, one needs to look at past, present and future actions occurring in the entire Washington D.C. metropolitan area, including such plans as the District of Columbia's Vision and Policy Framework, the Comprehensive Plan for the National Capital, the Anacostia Waterfront Initiative, and the citywide Bike Plan and the Metropolitan Branch Trail plans being prepared by the District Department of Transportation.

Overall, when the actions in the preferred alternative for FCP are added to other present and likely future actions in the region, the FCP plan may result in several cumulative impacts, but the actions being proposed will add only a negligible increment to these impacts in most cases. No cumulative impacts are expected on park management and operations as a result of the actions being proposed – no other NPS actions are expected that when added together with the proposed actions in this plan will result in a cumulative impact on regional park operations.

A moderate, long-term, beneficial cumulative impact could occur to the region's cultural resources when the beneficial impacts of the preferred alternative (e.g., stabilization and vegetation management at Fort Circle earthworks and fort sites) are added to other NPS cultural resource actions planned in Rock Creek Park (e.g., restoration of Peirce Mill), Monocacy National Battlefield site (e.g., protection of the cultural landscape and restoration of historic structures), as well as planned preservation improvements at other non-NPS Civil War sites such as the Anderson Cottage, Fort Ward and, Fort C.F. Smith.

A moderate to major, long-term, adverse cumulative impact could occur to natural resources when the negligible to moderate adverse natural resource impacts resulting from trail construction, provision of a visitor contact station in the vicinity of Fort Stevens, and other small facilities in the Fort Circle plan, are added to past, present, and reasonably foreseeable future impacts from other actions in the Washington, D.C., region (e.g., air and noise pollution from traffic, water

pollution from stormwater runoff, loss of vegetation and wildlife due to new developments). However, the preferred alternative will add only a negligible increment to this overall regional impact.

A beneficial cumulative impact will likely occur to the visitor experience as a result of this plan. When the beneficial impacts due to improvements in Civil War interpretation and increased recreational opportunities (e.g., establishing a new hiking trail, rehabilitating recreational facilities and expanding interpretive facilities) are added to other NPS activities in the region (e.g., a planned expansion in interpretive program and facilities at Monocacy, proposed upgrading of trails in Rock Creek) plus other actions expected to occur in the region (e.g., proposed additions/improvements to the Potomac Heritage Trail, Metropolitan Branch Trail, and Anacostia waterfront) there could be a minor to moderate, beneficial, long-term, cumulative impact on the visitor experience. This cumulative impact will include both a better understanding of the defense of Washington during the Civil War and increased recreational opportunities.

Finally, from a socioeconomic perspective, the minor beneficial impacts the preferred alternative will have on the economy, when added to the impacts of other activities in the region (e.g., expected increases in income due to population growth, increased regional development) will likely result in a moderate, long-term, beneficial cumulative impact. The FCP preferred alternative, however, will add only a negligible increment to this cumulative impact.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources: As described in the environmental assessment, no loss or damage to cultural resources would result from the actions of the preferred alternative. Beneficial impacts would include improving the protection and preservation of the earthworks and fort sites through stabilization and vegetation management.

As individual actions dealing with cultural resources are identified and funded, separate consultations under Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), would be undertaken with both the District and/or Virginia Historic Preservation Officer.

All actions proposing ground disturbance would first be evaluated by a professional archeologist to determine the level of archeological evaluation necessary.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat: As described in the environmental assessment, a number of threatened or endangered species of special concern exist within the FCP or in relatively close proximity.

Prior to commencement of any actions described within the environmental assessment, site-specific surveys would be conducted, as appropriate, to determine whether the area contained any listed species. As required by NPS *Management Policies*, the NPS would cooperate with the U.S. Fish and Wildlife Service and appropriate agencies to ensure the protection of any species found.

Whether the action threatens a violation of federal, state, or local environmental protection law: The preferred alternative violates no federal, state, or local environmental protection laws.

IMPAIRMENT OF PARK RESOURCES OR VALUES

In addition to reviewing the list of significance criteria, the NPS has determined that implementation of the preferred alternative will not constitute an impairment of the park's resources and values. This conclusion is based on a thorough analysis of the impacts described in the environmental assessment/assessment of effect, the agency and public comments received, and the professional judgment of the decision-maker in accordance with the NPS's *Management Policies, 2001* (December 27, 2000). As described in the environmental assessment/assessment of effect, implementation of the preferred alternative will not result in major adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation for Rock Creek Park, National Capital-East, or George Washington Memorial Parkway; (2) key to the natural or cultural integrity of the Park or to opportunities for enjoyment of the park; or (3) identified as a goal in the general management plans of any of the three parks or other relevant National Park Service planning documents.

PUBLIC INVOLVEMENT

The Draft Management Plan/Environmental Assessment for the FCP was made available for public review and comment on April 1, 2003. It was on official

review until May 30, 2003, and extended until August 15, 2003. Twenty-five responses were received from governmental agencies, organizations and individuals. Combined comments from the District of Columbia (Office of Planning, Department of Parks and Recreation, Department of Transportation) dealt with details of the plan yet to be worked out, with a request to update the socio-economic data, and with suggestions for a name change for the FCP and for combining alternatives 2 and 3.

Most comments recommended alternative 2 or 3 or a combination of both. No expression of support for alternative 1, the "no action" alternative was shown.

Several comments noted a need to update socio-economic data to reflect census data recently available and to reflect the new Advisory Neighborhood Commission districts.

Many reviewers expressed the opinion that the plan did not go far enough to restore the forts and earthworks. Many viewers were disappointed that the plan did not call for a 23-mile bicycle trail and asked that the concept be rethought.

CONCLUSION

The combination of alternatives 2 and 3 into a preferred alternative would not have a significant effect on the human environment and would not constitute an action that normally would require preparation of an environmental impact statement (EIS). The National Park Service, therefore, approves the selection of the preferred alternative for subsequent implementation.

Negative environmental impacts that could occur are minor or negligible with the following exceptions: moderately adverse impacts on vegetation, soils, water resources, and aquatic life would continue over the long term due to trail use through the loss of vegetation and possible compaction of soils; and moderate, short-term localized adverse noise impacts due to trail construction.

There are no significant impacts on public health, public safety, threatened or endangered species, historic properties either listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended:

9/30/03

Adrienne Applewhaite-Coleman — Date
Superintendent, Rock Creek Park

09/30/03

John Hale — Date
Superintendent, National Capital Parks-East

9/30/03

Audrey F. Calhoun — Date
Superintendent, George Washington Memorial Parkway

Approved:

9/30/03

Terry Carlstrom — Date
Regional Director, National Capital Region

Responses to Selected Comments

Government of the District of Columbia (combined comments of the D.C. Office of Planning, D.C. Department of Parks and Recreation, and the Bicycle Planning unit of the D.C. Department of Transportation).

Comment: The District of Columbia requested that additional or updated information be provided in the plan, suggesting several tables, updated socio-economic data, scale of visitor facilities, and details of public involvement.

Response: The NPS acknowledges that all of this information would be useful and helpful for readers. However, the NPS will not be preparing and distributing a final management plan/environmental assessment for FCP—for environmental assessments, a final document does not have to be prepared. Also, none of the requested information would affect the selection or implementation of the revised preferred alternative, nor the impacts identified and characterized in the environmental assessment/assessment of effect.

Comment: The District of Columbia has identified ways for the NPS to work with the District and other entities to integrate further NPS planning for the FCP with those entities. Other comments question costs and timing.

Response: The NPS appreciates the concerns that were raised by the District regarding the development of this plan. Much detailed planning will be required before the FCP plan can be fully implemented. Goals, connections, linkages, public involvement, and other coordination concerns will be dealt with as future planning unfolds. The District will be fully consulted and informed at each stage of planning. Further, discussions with the District of Columbia Department of Recreation to determine their interest in managing more of the recreation facilities in the FCP will be undertaken in the context of a forthcoming study of all parks in the city which provide recreational needs of the neighborhoods they serve.

Comment: Several commenters suggested the "Civil War Fort Circle Parks" name change. (District of Columbia, Committee of 100)

Response: The name change will be reconsidered.

Comment: Several commenters suggested that the FCP need to be designated a separate park unit (District of Columbia, Committee of 100, National Parks Conservation Association, Historic Takoma)

Response: The management of the Fort Circle Park System as a separate unit of the National Park System will be re-evaluated. The rationale for not pursuing such a proposal is discussed on Page 53 of the Draft Plan. Further, the current policy is to discourage additional separate units of the National Park System. This policy is due to the backlog of National Park System infrastructure needs and inadequate operational funds to staff new parks. While this policy may change in time, this plan recognizes the reality of the current circumstance.

Comment: The Committee of 100 suggested that additional land acquisition be undertaken to protect from adjacent adverse developments and to provide for trail construction.

Response: As it is not the goal to construct a bike trail, which would require additional lands, no land acquisition is contemplated for that purpose. Regarding adjacent lands, the National Park Service is constantly vigilant and aggressively protective of parks through the local planning and zoning processes, and will oppose, or seek mitigation for, developments which would damage park resources including the historical reciprocal views from the forts. In rare circumstances, acquisition of adjacent land will be considered to protect related natural or cultural resources.

Comment: The Committee of 100 recommended that cell towers and other intrusions not be permitted in the FCP.

Response: The National Park Service will not consider applications for cell towers which intrude on the skyline of Washington or which would be placed on historic earthworks of forts.

Comment: The District believes that Alternative 2 would be improved if it included a continuous bicycle trail from the Palisades to Fort Greble.

Response: This alternative was rejected as too damaging to the natural resources and aesthetic qualities of portions of FCP (see discussion pp. 51-52).

Comment: The District had questions of cost and timing specifics not discussed in the plan.

Response: The plan does not contemplate the NPS constructing and/or maintaining segments of the trail outside of the FCP units. Visitor contact facilities (Forts Dupont and Stevens) would be paid for and staffed by the NPS. As

noted at the beginning of the document, the plan is anticipated to be implemented within the next 10-15 years. Outsourcing of trail maintenance is an option but is beyond the scope of this plan.

Comment: The District noted the possible Metropolitan Branch Trail connection between Forts Totten and Slocum.

Response: The alignment of this trail has not yet been determined. At this point the NPS is committed to a walking trail on park lands with the possibility of a bicycle component as long as cultural and natural resources are sufficiently protected. The NPS will continue to work with the District in the development of the Metropolitan Branch Trail.

Comment: The District questioned what additional land or ROW acquisition would be necessary.

Response: None is contemplated.

Other Comments:

Comment: Several commenters were concerned about Fort Reno and the athletic fields (Tenleytown Neighbors Association, Inc., Tenleytown Historical Society).

Response: The proposed athletic field at Fort Reno was the subject of an environmental assessment completed in 2001. The assessment proposed to add a ballfield adjacent to the existing ballfield. No cultural resources will be lost or damaged as a result of construction of one additional ballfield. The National Park Service is currently discussing the construction and operation of the ballfields with the District of Columbia Department of Recreation.

Comment: Two commenters noted apparent discrepancies in the cost estimates. One commenter questioned whether the "install interpretive signs and waysides" element in Alternative 1 was also included in alternatives 2 and 3. Another commenter noted that the "Ongoing Operating Costs" column in alternative 3 did not add up.

Response: The answer to the first question is that interpretive signs and waysides are included within the first element of alternative 2 "designate foot trail linking

forts; produce interpretive materials," and in alternative 3 under several of the elements.

In alternative 3, the ONPS item was inadvertently left off of the chart. That amount is $375,000. The total anticipated ongoing operating cost would be $566,000.

The cost estimate for a combined alternative 2 and 3 is provided in the chart below.

Element	Initial Capital Costs	Ongoing Operating Costs
Designate foot trail linking forts: produce interpretive materials	$1,330,000	$110,000/year
Repair and/or upgrade recreational facilities (ballfields, basketball and tennis courts, picnic areas)	$290,000	$25,000/year
Stabilize selected earthwork and perform selected vegetation management	$260,000	$114,000/year
Upgrade existing restrooms, street furniture, and parking	$633,000	$50,000/year
Restore CCC-era Fort Stevens earthworks	$125,000	$17,000/year
Develop logo, audiotape and videotape for FCP	$345,000	$3,000/year
Furnishings for Fort Stevens Visitor Contact Facility and Fort Dupont activity center	$76,000	$4,000/year
*ONPS (currently $1.04 million)	none	$320,000 additional per year

Total anticipated costs	$3,059,000	$643,000/year

*ONPS or "Operation of the National Park Service" funds include staff salaries.

Comment: The Committee of 100 and several individuals advocated for stabilization and restoration of all forts in the system.

Response: The discussion of this topic is on page 52. The plan calls for continued preservation of all earthworks and forts but not restoration. Treatments to improve the preservation of resources such as erosion control, better policing of visitor use, etc. will be undertaken.

Comment: Several comments dealt with the condition of Battleground National Cemetery and the caretaker's lodge.

Response: The Cemetery and lodge are listed on the National Register of Historic Places and, by law and policy, must be preserved. The Battleground National Cemetery will be a stop on the proposed trail. The caretaker's house is in delicate condition awaiting preservation funding and would not serve as a visitor facility due to limited size, lack of parking and access for the disabled.