

General Management Plan / Environmental Impact Statement
MONOCACY NATIONAL BATTLEFIELD
Frederick County, Maryland

The *Draft General Management Plan / Environmental Impact Statement* describes four alternatives for managing Monocacy National Battlefield. The approved plan will establish a direction to guide the management of the battlefield's cultural resources and the visitor experience for the next 15 to 20 years.

Under **Alternative 1, the no-action alternative**, the current management of the national battlefield would continue into the future. Preserving and maintaining cultural and natural resources would be emphasized, and most visitor services would be available at the visitor center. In all the alternatives, all the historic structures would be preserved and maintained. **Alternative 2** would entail moving the administrative and maintenance staff into local leased space. Visitors would experience the national battlefield on an alternative transportation system. Historic farmlands would be leased to retain their agricultural use. New trails would enable visitors to reach the railroad junction and the sites of the Union entrenchments and the site of Maj. Gen. Lew Wallace's headquarters. The maintenance facility at the Gambrill Mill would be removed and the site re-landscaped. A new entrance to the 14th New Jersey Monument would improve safety, and a commemorative area would be created near the Pennsylvania and Vermont memorials for any new memorials. Exhibits would be available at a stone tenant house at the Thomas Farm, and access to the battlefield would be by trail around the farm. The possibility of a deck spanning Interstate Highway 270 is being evaluated in consultation with the Maryland Department of Transportation. If the deck proved feasible and if an agreement could be worked out, such a deck would be a part of **alternatives 2, 3, and 4**, with a road or walking trail crossing I-270. In **alternative 3**, national battlefield administration would be moved into the Thomas House, and the maintenance facility at Gambrill Mill would be expanded. Visitors would experience the site in their own cars. Historic farmlands would be leased to continue their agricultural use. Exhibits would be available in the Thomas Farm stone tenant house and the new visitor center. Entrance to the 14th New Jersey Monument would be relocated south along Maryland Highway 355 and the parking area redesigned. The Gambrill Mill trail would be extended to the historic railroad crossing. A commemorative area would be created near the Pennsylvania and Vermont memorials, but no new memorials would be added to the national battlefield. **Alternative 4** is the NPS preferred alternative. National battlefield administration would be moved into

the Thomas House, and maintenance would be expanded at its current location. Visitors would navigate the site in their own cars. The entrance to the 14th New Jersey Monument would be moved south to allow better sight distances. An extension to the Gambrill Mill trail would enable visitors to walk to the railroad junction and to the sites of the Union entrenchments and Wallace's headquarters. A landscaped commemorative area would be created near the Pennsylvania and Vermont memorials for any additional memorials. Exhibits would be available in the Thomas Farm's stone tenant house.

The effects of each alternative were analyzed, including the cumulative effects. Visitors' experience of the resources would vary, depending on which structures would be open to the public, the availability of an alternative transportation system, and the development of trail access to features such as the railroad bridge and railroad junction or the Union entrenchments and the site of Wallace's headquarters. **Alternatives 3 and 4** would result in a moderate long-term beneficial effect on the visitor experience. **Alternative 2** would lead to a major long-term beneficial effect on the visitor experience because an alternative transportation system would carry visitors around the battlefield and additional exhibits in historic structures would be open to visitors. **Alternatives 2, 3, and 4** would cause direct and indirect long-term negligible beneficial effects on the socioeconomic environment. **Alternatives 2, 3, and 4**, would have long-term moderate beneficial effects on pedestrian and vehicular access and circulation throughout the battlefield. An alternative transportation system in **alternative 2** could somewhat reduce the number of vehicles using these road systems, but the result would be negligible. The long-term effects on national battlefield operations and facilities from **alternatives 2, 3, and 4** would be major and beneficial.

The *Draft General Management Plan / Environmental Impact Statement* was distributed to other agencies and interested organizations and individuals for their review and comment. This *Abbreviated Final General Management Plan / Environmental Impact Statement* presents the comments and agency responses and a correction (errata) sheet that shows the minor changes that need to be made to the draft. The draft and the abbreviated final constitute a full final document. Because these changes were minor, the National Park Service has permission to print this abbreviated document.

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INTRODUCTION

This is an abbreviated *Final General Management Plan / Environmental Impact Statement* for Monocacy National Battlefield. The material included here is to be combined with the *Draft General Management Plan / Environmental Impact Statement*, which was distributed for public review September-November 2008 and again from May 1 to July 1, 2009. The abbreviated format has been used because the changes to the draft document are relatively minor and do not modify the analysis provided in the *Draft General Management Plan / Environmental Impact Statement*.

Use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 *Code of Federal Regulations* or *CFR* 1503.4(c)). The draft and abbreviated final documents together constitute the full *Final General*

Management Plan / Environmental Impact Statement, its alternatives, associated environmental impacts, and comments that have been received and evaluated and responses to them.

Following the announced release of this *Abbreviated Final General Management Plan / Environmental Impact Statement* in the *Federal Register*, there will be a 30-day no-action period. A “Record of Decision” of the approved final plan will then be signed by the regional director, National Capital Region, National Park Service (NPS), and copies will be made available to the public.

For further information, please contact the superintendent, Monocacy National Battlefield, 4801 Urbana Pike, Frederick, Maryland 21704.

CONSULTATION/COORDINATION

This section summarizes the agency, organization, and public comments received on the *Draft General Management Plan / Environmental Impact Statement*. These comments allow interested parties (including NPS decision-makers) to review and assess how other agencies, organizations, and individuals have responded to the proposed actions and alternatives and their potential impacts. The National Park Service provides responses to those comments that are considered substantive or when responses are helpful for clarification or other purposes.

Substantive comments are those that (1) question, with reasonable basis, the accuracy of information in the environmental impact statement, (2) question, with reasonable basis, the adequacy of environmental analysis, (3) present reasonable alternatives other than those presented in the environmental impact statement, or (4) cause changes or revisions in the proposal. No substantive comments were received.

PUBLIC REVIEW

The *Draft General Management Plan / Environmental Impact Statement* was placed on public review during September and October 2008. About 350 copies of the plan were mailed to agencies, organizations, and the national battlefield mailing list. In addition, the availability of the document and information about public meetings were announced in the local newspaper. Two

public meetings were held at the national battlefield on September 24th from 3:00 p.m. to 5:00 p.m. and again from 6:00 p.m. to 8:00 p.m. A total of three members of the public attended the two meetings. The “Notice of Availability” was held up and not published in the *Federal Register* until May 1, 2009. Therefore, a letter was sent to all recipients of the original mailing apprising them that the official review period would be May 2 to July 1, 2009. A day-long public open house was held at the visitor center on June 4, 2009. No written comments were received at that time.

Approximately 18 written and electronic comments were received during the review beginning in September 2008 and continuing until July 1, 2009. The public did not present any new alternatives, and public comment analysis did not result in any significant modifications to the current alternatives. Letters from federal, state, and local governments and organizations are reproduced on the following pages, as required. These entities either supported the preferred alternative (#4) or had no comment.

The public’s comments have been considered by the National Park Service in preparing this *Abbreviated Final General Management Plan / Environmental Impact Statement*, consistent with the requirements of 40 CFR 1503. The following section summarizes comments and contains the NPS responses. The NPS responses make factual changes, clarify or provide new information, or

explain why the public comments do not warrant further agency response.

COMMENTS/RESPONSES (ORGANIZATIONS/AGENCIES)

The National Park Service is only required to respond to substantive comments. There were no substantive comments, but the agency has responded to most other comments because it wants to show that it does pay attention to public comment. Note: comments have been reproduced verbatim as much as possible, except when clarification was deemed necessary.

U.S. Environmental Protection Agency

Comment: During any construction activities, impacts to resources should be avoided and minimized. In addition, activities under this action should comply with all appropriate state and federal guidelines, regulations, and executive orders (including Invasive Species, Green Buildings, Low Impact Development, etc). Information regarding Low Impact Development can be found at <http://www.epa.gov/nps/lid/>. EPA would appreciate consideration of visitor shuttles with use of low emission vehicles to replace or reduce use of individual vehicles in touring the site. An air quality analysis may be warranted if there is significant roadway construction.

NPS Response: Thank you for your comments.

Frederick County Division of Planning

Comment: Add a trail from the visitor center to the railroad junction as was done in alternative two.

NPS Response: Several commenters requested this addition. The change will be made.

Comment: The plan should identify opportunities for bicycle and horseback use of and/or through the battlefield. Prohibit only where resource impacts have been clearly identified — i.e., off-trail or off-road.

NPS Response: Monocacy is a national battlefield site commemorating an important Civil War engagement. Its location, near Frederick, Maryland, makes its potential to be overrun by recreational users a concern. The trails proposed in the plan are targeted to important locations within the battle and are not appropriate for recreational use because of their short length and use by pedestrians.

Comment: The plan should clarify the guidance/policy on modern intrusions such as communications or related towers.

NPS Response: A nationwide policy for the National Park Service dealing with cell towers is being developed that will clarify this issue.

Comment: The plan should note the possibility of providing a continuous trail between the Thomas Farm and Gambrill Mill and allowing connections

to the south and west connecting to the Ballenger Creek Trail. This would provide a conceptual route of the proposed Shared Use Monocacy River Greenway trail. If this connection was made from the south side of the Monocacy River / Worthington Farm, it would require a bridge over the Monocacy River. Another possible connection to the south and west from the Best Farm would parallel the CSX railroad underneath I-270.

NPS Response: When a Shared Use Monocacy River Greenway trail becomes a reality, the National Park Service will consider what connections are appropriate and undertake an environmental assessment of the effects of those new trail connections.

Comment: The plan should expand the section on “Visitor Experience and Visitor Safety” (p. 87) to consider the possibility of a safe nonmotorized crossing of MD 355; separated grade under MD 355 / Monocacy River Bridge; or separated grade under MD 355 / CSX rail bridge; or at-grade.

NPS Response: This appears to be a continuation of the previous comment. At this time, the National Park Service does not see a need for such a crossing under MD 355 because formal trails are not being proposed.

Civil War Preservation Trust

In conclusion, CWPT supports the National Park Service’s preferred alternative, Alternative Four, because the proposals included in this alternative will enhance the visitor experience,

reconnect two important parts of the battlefield, and minimize modern intrusions to protect the integrity of the battlefield.

NPS Response: Thank you very much.

Friends of Antietam and Monocacy

Comment: I believe that the I-270 deck would create another distraction to driving on an already hazardous highway and create a negative experience for visitors with the noise and pollution they would experience making the crossing.

NPS Response: The concept for a deck was to accomplish the opposite of the author’s impression. It was to connect the two farms in such a way that visitors would be less distracted by highway traffic than an ordinary walkway or road bridge. We don’t see that it would be any more of a hazard to drivers on I-270 than a bridge.

Monocacy Scenic River Advisory Board (10/18/2008)

Comment: The River Board strongly encourages the National Park Service to retain the parking area on the east side of MD 355 and reconstruct a formal parking lot for boating access to the River (alternative #2). It is the position of the River Board that the provision of convenient public parking and access to the river facilitates meaningful river experiences for citizens and travelers

and promotes stewardship of this great resource.

NPS Response: The current parking area on the east side of MD 355 is an informal parking area. Its entrance is considered unsafe. Access to the river will still be available via the 14th New Jersey Monument parking area.

Comment: We recommend that the National Park Service add a trail extension from the existing Thomas Farm pedestrian trail, along the south side of the Monocacy River between I-270 and MD 355 (a River Board member traversed this trail several years ago during a battlefield clean-up event). A trail along the scenic Monocacy River, in our opinion, is not inconsistent with “preserving, commemorating, and interpreting the Battle of Monocacy.” This limited river trail could be a focal point for environmental education with markers or wayside exhibits about the river, its ecology and place in the battle. To address unintended access for “a recreational amenity far removed from the mandate of Congress” a fence or other obstruction could be placed at the southwest quadrant of the river and MD 355 to ensure that the river trail is accessible only from the interior of the battlefield, off the Thomas Farm pedestrian trail.

NPS Response: A partial trail already exists down to the river. Should the Shared Use Monocacy River Greenway become a reality, an environmental evaluation would occur at that time.

Comment: The management plan should include a forestry management

plan with special attention devoted to control of exotic, invasive plant species as well as tree pathogens. This is consistent with the statement in chapter 1, which states, “Monocacy National Battlefield contains significant natural resource areas that require special management efforts.”

NPS Response: Monocacy National Battlefield has an exotic plant management program in place that is addressing the concerns raised in this comment.

Comment: The River Board recommends that soil and water conservation plans for the farms be reviewed and revised to focus on the practices or devices that protect water quality, in stream and riparian habitat (we note that cultivation close to the river in the northeast quadrant of I-270 and the river has ceased and meadow grasses now occupy the location [this is beneficial, whether due to the county’s sewer line installation or progressive farming practices]).

NPS Response: Conservation plans are in place for all the farms on the battlefield that mandate riparian and stream protection.

COMMENTS AND RESPONSES (INDIVIDUALS)

Comment: The Thomas hill field played a decisive part in the battle, yet there is no easy way to access it currently, nor is it projected in the management plan. I believe a trail should be added to the plan, which would provide access to the hill field

from the Thomas Farm trail. Waysides should detail the part the hill field played in the final moments of the battle. In addition, waysides could interpret the 18th century complex of ferry, tavern, and road that occupied the same area.

NPS Response: As part of the recently completed “Long Range Interpretive Plan,” NPS staff will be looking at realigning the Thomas Farm trail to provide better interpretive opportunities.

Comment: One of the most difficult parts of the battle to visualize is the action at the railroad junction. Alternative 2 proposes constructing a trail, with appropriate waysides, from the visitor center to an overlook above the junction. I think this should be added to alternative 4. It would, with the addition of the extended Gambrill’s Mill trail, vastly enhance interpretation of this difficult, but important site.

NPS Response: See the response above under Frederick County, Division of Planning.

Comment: The national battlefield boundary should be expanded as a buffer.

NPS Response: The national battlefield is almost completely surrounded by development. The National Park Service does not intend to acquire any lands outside the already authorized boundary. On a willing-seller basis, the National Park Service would purchase those properties within its authorized boundary that it does not already own or that it does

not already have an easement on. A more complete discussion is on pages 49 and 50 in the draft plan.

Comment: NPS preferred alternative 4 does not address removal of the maintenance building (an intrusion on the landscape), vehicular access to remote areas of the Araby (Thomas) farm battlefield instead of foot traffic, or provision of a congruous driving tour route for visitors through a very disjointed system of units constituting the battlefield property.

NPS Response: This was the only comment regarding the maintenance building. There was no other location in the national battlefield that appeared to meet the requirements for a maintenance facility that would not also be an intrusion on the landscape. Alternative 2 looked at rental space outside the national battlefield as a possible solution, but distance, traffic on MD 355, and general inconvenience made it impractical.

The plan does provide for interpretation of the Lewis Farm, a remote area of the Araby farm battlefield, at the visitor center.

This was the only comment regarding the need for a driving tour route. The management plan notes the problem of access to the various sites and the concern for visitors unfamiliar with the site having to use busy MH 355. In the end, it was determined that such an internal drive would be very intrusive on the cultural landscape, require considerable impact on the natural resources of the national

battlefield, and would have been costly. Other methods were considered, such as a park transportation system (alternative 2), better directional signs, additional trails, and a deck or bridge over I-270 that was less intrusive on the landscape and more cost-effective.

Comment: Could better partnering with the private sector; greater flexibility in creative solutions and alternatives; and more reliance on volunteerism, grants, and other approaches keep the preservation, interpretation, and other missions fresh and transformational? For example, if Antietam has partnered with the Frederick-based museum of Civil War medicine for a field hospital site management and interpretation, why could this not be similarly incorporated at Gambrill Mill with no or little additional cost, turbulence, or deviation from primary NPS control.

NPS Response: It is not really clear what is being proposed. A combination of actions such as partnering, use of additional volunteers, grants, etc., could greatly improve preservation and interpretation. Any of these actions could be undertaken at any time. Description in the management plan is not necessary.

Comment: The deck over I-270 is ridiculous budgetarily. It may well be that a link could come less expensively and just as felicitously from a simple roadway bridge between Thomas and Worthington farms and re-development of original farm lanes for all manner of travel convenience (thus permitting physically impaired (challenged) visitors to share the interpretation or tour

experience with those more physically blessed. None of the alternatives adequately allow for motor vehicle touring of the battlefield core areas, especially because a full spectrum of age and physical prowess must be taken into account.

NPS Response: The deck represents a vision and is fully described on page 84 of the draft plan. How that vision is translated into construction has yet to be decided. It would only be constructed as part of the mitigation for impacts related to the widening of I-270.

The battlefield is amazingly intact after 146 years. Construction of additional roads in the battlefield would have numerous impacts: (1) it would make farming the properties less profitable and more difficult at a time when local farms are finding it less profitable to farm in an urban setting, (2) there would be the need for additional costly bridges and pavement to connect all areas of the site, (3) there would be visual impacts on a largely intact battlefield, and (4) it would require more staff and more funds to maintain, and would be less sustainable environmentally.

Comment: The critical Monocacy rail junction triangle demands focus and attention. It is the apex of why a battle took place here in the first place — railroad junction and nearby bridge crossing. It demands a wayside and tour stop (adequate parking exists but needs improvement).

NPS Response: The preferred alternative incorporates the junction

into the tour stop at the 14th New Jersey Monument, along with improved parking. Interpretive media will be developed as part of the “Long Range Interpretive Plan.”

Comment: Removal of a road toll house on Araby Church Road off MD 355 must not occur — the structure (and any like it) demands preservation and interpretation. It too is vital to understanding the overall historical context of the battlefield site in the sense of pre- and post-Civil War events. If Gambrill Mansion (obviously post-battle), then why not the Toll House? Relocate the maintenance intrusion but leave historical structures.

NPS Response: The toll house does not meet National Register of Historic Places criteria for listing. It was moved to the site from another location outside the battlefield and has no historical connection to the Battle of Monocacy. It is, therefore, an intrusion on the battlefield and an interpretive conundrum. The structure is in very poor condition, and its interior has been greatly altered. Its location so close to the intersection of Baker Valley Road and MD 355 presents a hazard to visitors and vehicles alike. The National Park Service would donate the structure to any historic preservation organization agreeing to remove it from the battlefield.

Comment: Better access to remote areas of the battlefield — blockhouse, Wallace headquarters, earthworks, Thomas Hill farm, etc. — are not adequately addressed in present study although alluded to at various points. Instead of

worrying just about the Thomas-Worthington situation link, address foot trail, bridges across creek, river, railroad, etc.

NPS Response: The preferred alternative includes a trail to Wallace’s headquarters and to the union entrenchments (described page 77). The preferred alternative does not include public access to the Thomas Hill Farm, also known as the Lewis Farm, because of logistical and safety concerns. There is little or no room for a trail along either side of Baker Valley Road either from the Thomas Farm or the Worthington Farm parking area along Baker Valley Road. Vehicle access is steep, and no appropriate area for parking exists at the Lewis Farm site.

Comment: Reassess the aesthetic and historical area from the visitor center to the railroad junction. Access, interpretation, importance, etc., to the park and visitor experience have not been clearly addressed, and lack of waysides, cannon, fencing, ground cover etc. are clearly issues not addressed, so much of study appears out of context to real interests and needs of visitors.

NPS Response: The National Park Service will add a trail from the visitor center to the railroad junction. Interpretive media will be developed in accordance with the “Long-Range Interpretive Plan.”

Comment: Reconstruct the Gambrill Mill with its third story and wooden gable roof.

NPS Response: Gambrill Mill has been significantly changed from its historic appearance. The park staff and planning team talked about the possibility of restoring the Mill to its appearance during the battle. A decision was made that as a new park, there were many other structures that were more central to the battle story

and its interpretation. The mill is in good condition and will be needed for several more years for office space and storage. The planning team decided that this was a project that could wait until the next general management plan is undertaken in about 20 years.

DRAFT GMP/EIS CORRECTIONS (ERRATA)

This section contains those changes that should be made to the *Draft General Management Plan / Environmental Impact Statement*. Some of these changes are a result of public comments and others are editorial in nature. Please make the following changes:

Page 5 — top right column

The sentence should read: “The national battlefield lies in an unincorporated area approximately 3 miles south of the center of Frederick, the largest city in Frederick County and the second largest incorporated city in Maryland.”

Page 9 — Chapter 1, second full paragraph, sentence 1

The sentence should read “Victoire Vincendiere sold L’Hermitage, which is on the west side of the Monocacy River, in 1827.

Page 10 — right column, first full paragraph, 3rd sentence

The sentence should read: “Seizing the opportunity, General Lee devised a bold and daring invasion with four objectives: first, to clear the upper Shenandoah Valley of Union Forces; second”

Page 12 — left column, middle paragraph

The sentence should read: “By the time Jubal Early’s forces reached Washington on July 11, they were exhausted from their long march and could not make a concerted attack until the following day. Reinforcements from Petersburg had begun to

arrive in the capital. Although sporadic”

Page 25 — Chapter 1, paragraphs 1 and 2
The community that has been referred to in this document as “Araby Church” should be “Araby.”

Page 44 — Modern Intrusions, second paragraph

The reference to “a light rail line through the Thomas and Best farms” is misleading. The “transitway” as currently delineated on the county’s *Comprehensive Plan* would run parallel to I-270 and parallel to the Thomas and Best farms through the battlefield. The specific type of transit has not been identified.

Page 75 — Introduction, paragraph 4, 3rd sentence

The sentence should read: “Beginning at the visitor center inside the north boundary, visitors would drive to the 14th New Jersey Monument, the Worthington Farm, and across the deck bridging I-270 to the Thomas Farm.”

Page 76 — BATTLEFIELD PRESERVATION ZONE

Add a paragraph stating: “A trail would be built from the visitor center south to an overlook above the railroad junction and the Monocacy River bridges, where the battle began.”

A map change showing this trail has been added and included on the following page.

Page 130 — Chapter 3, paragraph 3
All communities listed are unincorporated.

Page 141 — Chapter 3, paragraph 3, second sentence

The reference should be to Urbana Plan Commission rather than to the “Urbana Planned Utility District.” Based on the current *Urbana Region Plan* (2004), the Urbana community could have a build out of approximately 6,125 dwellings, not the “8,000” noted in the paragraph.

Page 152 — first full paragraph
“visitor center” should be changed to “Gambrill Mill”; this should also be added to alternative 4, pages 154-155.

Page 173 — Table 5: Data from 2004-2007 should be included, as follows:

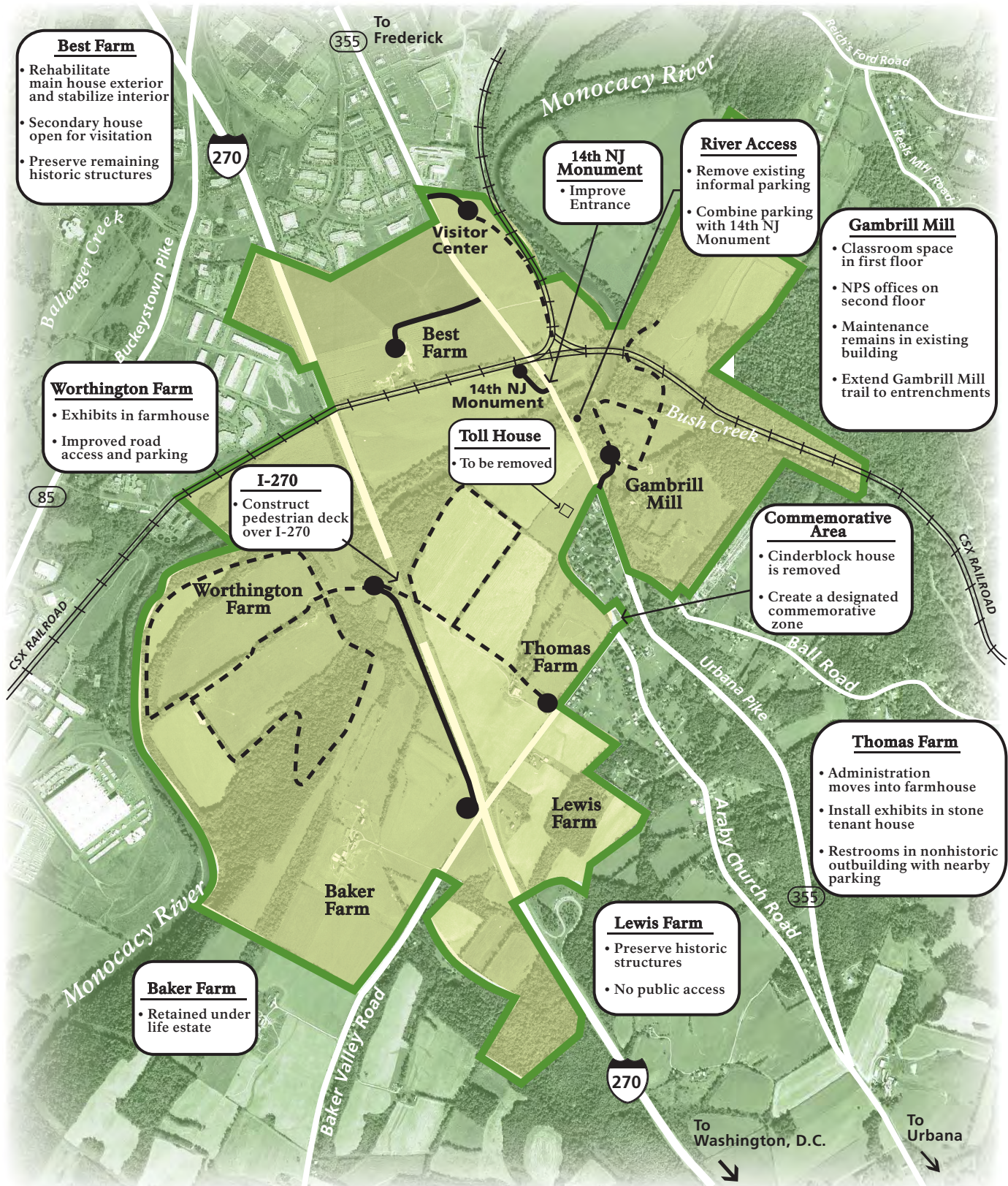
2004	17,176
2005	18,008
2006	18,230
2007	21,203





The sentence introducing the table should say” Table 5 (copied from the NPS “Public Use Statistics” Web site) shows the annual visitation for Monocacy National Battlefield between 1991 and 2007.”

Page 174 — Table 6: Monocacy National Battlefield Visitation by Month, 2003

This table should be updated with the following 2008 data.

Month	Visits
January	956
February	2,074
March	2,114
April	2,979
May	3,772
June	2,675
July	1,971
August	3,767
September	2,710
October	4,468
November	2,420
December	1,370
Total	31,276



-  Park Boundary
-  Pedestrian Trail
-  Vehicular Access
-  Parking Node



**Preferred Alternative
Alternative 4**

Monocacy National Battlefield

United States Department of the Interior
National Park Service

DSC / 894 / 20018A/ Sept. 2009

COPIES OF ORGANIZATION / AGENCY LETTERS

EPA -1

June 25, 2009

Ms. Susan Trail

Monocacy National Battlefield

4801 Urbana Pike

Frederick, Maryland 21704

RE: Draft General Management Plan/ Environmental Impact Statement Monocacy National Battlefield, Maryland (April 2009) CEQ #20090133

Dear Ms. Trail,

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the United States Environmental Protection Agency (EPA) has reviewed the subject document.

The purpose of this plan is to be the basic guidance document that will define a direction for the management of Monocacy National Battlefield. When approved, the plan will represent an agreement by the National Park Service with the public on how the battlefield will be used and managed in the next 15-20 years. The area covered by this plan comprises 1,647 acres that encompass most of the lands upon which the Battle of Monocacy was fought during the Civil War.

Four alternatives are considered in this Draft General Management Plan/ Environmental Impact Statement (DEIS). The three action alternatives preserve and maintain all historic structures and the historic farmlands would continue to be leased to keep them agricultural. Alternative 4 is the preferred alternative. Under this alternative, national battlefield administration would be moved into the Thomas House and the maintenance would continue to operate at its present location. Visitors would use their own vehicles to drive around the battlefield. This alternative also includes a landscaped commemorative area, an extension to the Gambrill Mill Trail, new parking nearer to the Worthington House and exhibits and restrooms at the stone tenant house on the Thomas Farm. The possibility of a deck spanning I-270 is being evaluated in consultation with the Maryland Department of Transportation. This is being considered as a mitigating measure for potential impacts caused by the widening of I-270.

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

During any construction activities, impacts to resources should be avoided and minimized. In addition, activities under this action should comply with all appropriate state and federal guidelines, regulations, and executive orders (including Invasive Species, Green Buildings, Low Impact Development, etc). Information regarding Low Impact Development can be found at <http://www.epa.gov/nps/lid/>. EPA would appreciate consideration of visitor shuttles, with use of low emission vehicles, to replace or reduce use of individual vehicles in touring the site. An air quality analysis may be warranted if there is significant roadway construction.

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

Sincerely,

Barbara Rudnick

NEPA Team Leader



Maryland Department of Planning
Maryland Historical Trust

Martin O'Malley
Governor

Anthony G. Brown
Lt. Governor

Richard Eberhart Hall
Secretary

Matthew J. Power
Deputy Secretary

November 14, 2008

Susan Trail, Superintendent
Monocacy National Battlefield
National Park Service
4801 Urbana Pike
Frederick, Maryland 21704

Re: Draft *General Management Plan / Environmental Impact Statement (GMP)*
For Monocacy National Battlefield
Frederick County, Maryland

Dear Superintendent Trail:

Thank you for providing the Maryland Historical Trust (Trust) with a copy of the draft GMP/DEIS for Monocacy National Battlefield, for review and comment. Trust staff reviewed the document pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and the relevant provisions of the NPS Nationwide Programmatic Agreement, with regards to effects on historic and archeological properties. We offer the following comments.

The draft document presents detailed information and justification regarding the guiding principles, concerns, resources, and alternatives NPS considered during the GMP planning and development process. The GMP places strong emphasis on ensuring the appropriate long term preservation of the battlefield resources, cultural landscapes, historic structures, and archeological sites that comprise the Monocacy National Battlefield National Historic Landmark. Based on the information presented in the GMP, the Trust supports the NPS preferred alternative, Alternative Four. Alternative Four presents a sound basis for addressing the various resource preservation, visitor service, commemorative monument, administrative and maintenance issues while ensuring the appropriate stewardship and interpretation of this significant national landmark. We look forward to working with NPS to complete the Section 106 review of individual undertakings, as relevant, during the implementation of the preferred alternative.

If you have questions or need further assistance, please contact Jonathan Sager at 410-514-7636 / jsager@mdp.state.md.us or me at 410-514-7631 / bcote@mdp.state.md.us. Thank you for providing us this opportunity to comment.

Sincerely,

Beth Cole
Administrator, Project Review and Compliance
Maryland Historical Trust

EJC/JES /200802962

cc: Janet Davis (Frederick County)



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November 24, 2008

Susan Trail, Ph.D.
Superintendent
Monocacy National Battlefield
4801 Urbana Pike
Frederick, MD 21704

RE: Monocacy National Battlefield General Management Plan and EIS

Dear Dr. Trail:

Staff from the Frederick County Division of Planning is pleased to review and comment on the Monocacy National Battlefield's Draft General Management Plan and Environmental Impact Statement. County staff understands the historical significance of the Battlefield and look forward to working together towards the common goals of the protection of its landscape and resources.

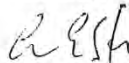
We support Alternative Four with the following comments and suggestions:

- *Alternative Two: Alternative transportation system:* opportunities to provide alternative transportation shuttle system for special events should be identified.
- *Alternative Four – Preferred:* Add trail project from visitor center to Railroad Junction as noted in alternatives two and three.
- *Alternative Four – Preferred:* Concur with proposed trail from Gambrill Mill area over Bush Creek and under the CSX Rail trestle as noted in Alternatives two and four – this would potentially provide a connection for the County Bikeways and Trails Plan's proposed Monocacy River Greenway
- *Alternative Four – Preferred:* Concur with of proposed landscape pedestrian deck over I-270 as part of mitigation for I-270 widening project.
- *Alternative Four Alternative Four – Preferred:* Concur with all proposed mitigation set forth by Maryland State Highway Administration and agreed to by National Park Service to minimize impact of widening of I-270 from four to six lanes through battlefield as noted on page 84 of Chapter 2.
- *Alternative Four – Preferred:* Identify opportunities to provide for bicycle and horseback use of and/or through the battlefield. Prohibit only where resource impacts have been clearly identified i.e. off-trail or off-road
- *Alternative Four – Preferred:* provide trail from the proposed improved New Jersey Monument parking area and provide trail access to Monocacy River. Add additional parking here if parking lot south of Monocacy River on MD 355 is removed.

Susan Trail, Ph. D.
November 24, 2008
Page 2

- *Alternative Four – Preferred:* County staff concurs with the recommendation to remove the “cinder block house” from its current location on Baker Valley Road, based on NPS cultural resources research that shows there was not a toll house at this spot and the building itself has not been confirmed to have been a toll house.
- *Chapter 2, page 44:* clarify guidance/policy on modern intrusions to include policy on communications or related towers
- *Chapter 2, page 44:* remove reference to “light rail through Thomas and Best Farm” and any related maps that show transitway through the park anywhere other than parallel to I-270. The “transitway” as currently delineated on the County’s Comprehensive Plan would be parallel to I-270 through the Battlefield and the specific type of transit has not been identified.
- *Chapter 2, page 74, paragraph 4:* “visitors will traverse the battlefield by foot, walking from visitor center to Worthington Farm and New Jersey Monument” Clarify walking via trails, street crossings?
- Note possibility of providing a continuous trail between the Thomas Farm and Gambrell Mill and allowing connections to the south and west connecting to the Ballenger Creek Trail. This would provide a conceptual through route of the proposed Shared Use Monocacy River Greenway trail. If this connection was made from the south side of the Monocacy River / Worthington Farm it would require a bridge over the Monocacy River. Another possible connection to the south and west from the Best Farm would parallel the CSX railroad underneath I-270.
- *Chapter 2, page 87:* Expand visitor traffic control safety plan to consider identifying and providing a safe non-motorized crossing of MD 355; separated grade under MD 355 / Monocacy River Bridge; or separated grade under MD 355 / CSX rail bridge; or at-grade.
- *Chapter 3, page 130, paragraph 3:* all communities listed are unincorporated
- *Chapter 3, page 131, paragraph 1:* typo “ditance” = distance
- *Chapter 1, page 25, paragraphs 1 and 2:* “Araby Church” should be “Araby”
- *Chapter 1, page 9, paragraph 3, sentence 1 should say* “On the West side of the Monocacy..”
- *Chapter 3, page 141:* The County does not have any current plans to construct a water line along Baker Valley Road.
- *Chapter 3, page 141:* Reference to Urbana Planning Utility District is incorrect. Based on the current Urbana Region Plan (2004), the Urbana community could have a build out of approximately 6,125 dwellings.

Sincerely,



Eric E. Soter, Director
Division of Planning

Cc: John Thomas
File

June 23, 2009

National Park Service
Susan Trail, Superintendent
Monocacy National Battlefield
4801 Urbana Pike
Frederick, Maryland 21704

FASCIMILE TRANSMISSION: 201-662-3420

Original document will follow by first class mail.

Dear Superintendent Trail:

I am writing on behalf of the Civil War Preservation Trust (CWPT), a 55,000-member national nonprofit battlefield preservation organization. We have protected more than 25,000 acres of hallowed ground throughout the United States, including 440 acres at Monocacy National Battlefield. Please accept this letter as our comments on the Monocacy National Battlefield Draft General Management Plan/Environmental Impact Statement (GMP).

CWPT concurs with the National Park Service's determination of Alternative Four as the preferred alternative in the GMP. This alternative accomplishes two critical needs: enhancing the visitor experience and reestablishing a connection between Worthington and Thomas Farms – a project of vital importance to helping visitors fully understand the battle.

Alternative Four would implement a number of initiatives to enhance the visitor experience at the battlefield including: locating exhibits in the Worthington House and the stone outbuilding on the Thomas Farm, constructing new trails on the battlefield, upgrading commemorative memorial locations and placing interpretative rangers at key locations during peak season. These efforts will provide visitors with a more comprehensive and contemplative experience at the battlefield park.

Visitors to the battlefield park currently must drive between the Worthington and Thomas Farms; there is no pedestrian access connecting both farms due to I-270 bisecting the battlefield. As a

result, it is difficult for visitors to fully understand and envision how the battle unfolded throughout that day in July 1864. It was from the fields on the Worthington Farm that the Confederate troops initiated three advances toward the Union line positioned at the neighboring Thomas Farm.

CWPT is highly supportive of the proposal to construct a pedestrian deck over I-270 to connect the Worthington Farm to the Thomas Farm and reestablish an historic fence line. This would be completed through the process of mitigating the effects of the Maryland State Highway Administration's plan to widen I-270. In addition to establishing pedestrian access between the Worthington and Thomas Farms, it is important to reestablish significant vistas between the two farms. These combined actions would better knit together the two halves of the current park and allow for the safe passage of park visitors wishing to see the battlefield in its entirety.

CWPT also supports the proposal calling for the restoration of historic landscapes to accurately represent the appearance of Monocacy battlefield during the battle in 1864. This proposal includes the removal of modern landscape features such as agricultural trench silos and the rehabilitation of historic landscape features such as hedge rows and tree lines. These actions are desired because of the unique role that terrain and landscape features play in the interpretation of military parks. In the case of casual park visitors, there can be profound misconceptions of the battle as a result of alterations in the historic landscape, especially since most casual visitors expect historic sites to accurately reflect the period in history they represent.

Please note that the Battle of Monocacy, otherwise known as the "Battle that Saved Washington," was recognized as a nationally significant historical resource in a 1993 Congressional study on the status of the nation's Civil War battlefields conducted by the Civil War Sites Advisory Commission. Although the battle was a Confederate victory, Union Maj. Gen. Lew Wallace's delaying action bought time for additional troops to arrive to bolster the defenses of Washington.

In conclusion, CWPT supports the National Park Service's preferred alternative, Alternative Four, because of the proposals included in this alternative will enhance the visitor experience, reconnect two important parts of the battlefield and minimize modern intrusions to protect the integrity of the battlefield.

Thank you for the opportunity to comment on the General Management Plan. Please feel free to contact me or Emily Egel of my staff at (202) 367-1861 x 211 if you wish to discuss our comments further.

Sincerely,

O. James Lighthizer, President

Civil War Preservation Trust

Hi Susan,

After reviewing the four alternative plans for the Monocacy Battlefield I agree with alternative four with one exception. That exception being the building of a deck across I-270. I believe this would create another distraction to driving on an already hazardous highway. I also believe it would create a negative experience for visitors with the noise and pollution they would experience making the crossing. Please keep up all of your good works, and thank you for allowing me to be part of the planning. I would like to volunteer more working outside if you could use me.

Best Regards,

Jon

Jon B. Stang

Friends of Antietam and The Monocacy

242 Perrywinkle Lane

Gaithersburg, MD 20878

240-401-0170



November 18, 2008

Susan Trail, Ph.D.
Superintendent
Monocacy National Battlefield
4801 Urbana Pike
Frederick, MD 21704

RE: General Management Plan and Environmental Impact Statement

Dear Dr. Trail:

On behalf of the Monocacy Scenic River Citizens Advisory Board, I am submitting comments on the Monocacy National Battlefield's Draft Management Plan and Environmental Impact Statement. The River Board discussed the Management Plan at our November 5, 2008 meeting.

The River Board provides advice and recommendations to Frederick and Carroll County governments on land use, land development proposals and resource management issues within the Monocacy River Watershed, serving as an advocate for the River and its extended natural resources. One of the official duties of the River Board is to "review and make recommendations on federal, state, county and local programs, regulations and public and private projects, including land use and development proposals, which the River Board believes may have an impact on the Monocacy River."

The River Board believes that the Monocacy Battlefield's General Management Plan should enhance the scenic and natural landscape conditions adjacent to and in the vicinity of the state-designated Scenic Monocacy River, in tandem with the National Park Service's goal of protecting the battlefield's historical values and its visitors' experiences. To that end, the River Board offers the following comments and suggestions:

- The River Board strongly encourages the National Park Service to retain the parking area on the east side of MD 355 and reconstruct a formal parking lot for boating access to the River (Alternative #2). It is the position of the River Board that the provision of convenient public parking and access to the River facilitates meaningful River experiences for citizens and travelers and promotes stewardship of this great resource.
- We recommend that the National Park Service add a trail extension, from the existing Thomas Farm pedestrian trail, along the south side of the Monocacy River between I-270 and MD 355 (a River Board member traversed this trail several years ago during a battlefield clean up event). A trail along the Scenic Monocacy River, in our opinion, is not inconsistent with "preserving, commemorating, and interpreting the Battle of Monocacy." This limited River trail could be a focal point for environmental education with markers or wayside exhibits about the River, its ecology and place in the Battle. To address unintended access for "a recreational amenity far removed from the mandate of Congress....", a fence or other obstruction could be placed at the southwest quadrant of the River and MD 355, to ensure the River trail be accessible only from the interior of the Battlefield, off the Thomas Farm pedestrian trail.
- We support the proposed deck over I-270, linking the eastern and western portion of the Battlefield.
- The River Board endorses the construction of a short trail on the east side of the Monocacy River, northward from the existing Gambrill Mill Trail (Alternatives #2, #4)
- The Management Plan should include a forestry management plan with special attention devoted to control of exotic, invasive plant species as well as tree pathogens. This is consistent with the statement in Chapter 1, which states, "Monocacy National Battlefield contains significant natural resource areas that require special management efforts."
- The River Board recommends that soil and water conservation plans for the farms be reviewed and revised to focus on the practices or devices that protect water quality, instream and riparian habitat (we note that cultivation close to the River in the northeast quadrant of I-270 and the River has ceased and meadow grasses now occupy the location. This is beneficial, whether due to the County's sewer line installation or progressive farming practices)

Thank you for the opportunity to review the Monocacy National Battlefield's Management Plan.

Sincerely,



Tom Devilbiss, Acting Chair
Monocacy Scenic River Citizens Advisory Board



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

