



National Park Service
US Department of the Interior
Guilford Courthouse National Military Park
North Carolina

FINDING OF NO SIGNIFICANT IMPACT
Guilford Courthouse National Military Park

Recommended:

AARON LA ROCCA Digitally signed by AARON LA ROCCA
Date: 2025.07.29 08:58:37 -04'00'

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Approved:

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Acting Regional Director, Interior Region 2, National Park Service

INTRODUCTION

The National Park Service (NPS) prepared a development concept plan / environmental assessment (DCP/EA) for Guilford Courthouse National Military Park (Park) in Greensboro, North Carolina in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended; the Department of the Interior NEPA regulations (43 Code of Federal Regulations [CFR] Part 46); NPS Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making; the NPS NEPA Handbook (NPS 2011, 2015a)¹; section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) (16 United States Code [USC] 470 et seq.); and 36 CFR Part 800.

The purpose of the project is to develop a plan to guide management of recent and planned land acquisitions, facilities, parking, roadways, trails, and any future development or rehabilitation in the park's developed areas. Specifically, the DCP/EA addresses:

- **Cultural resources:** The rehabilitation and protection of the setting and character of the cultural landscape, consistent with the recommendations in previous park resource documentation.
- **Visitor Use and Experience:** Visitor use at the Hoskins Farm site and its integration into the park's management planning, balances recreational and solemn/reverent experiences, and improves visitor access, circulation and safety.

This project is needed to provide guidance for long-term management of the park in a way that protects its cultural landscape and responds to changing urban development patterns in Greensboro. The park, once surrounded by rural farmlands, has become increasingly urbanized in the last few decades. In addition, Old Battleground Road cuts through the middle of the core battlefield, posing an ongoing challenge to the management of the landscape and to maintaining the solemnity of the battlefield for visitor experience. Additionally, the project addresses the recent acquisition of the culturally significant Hoskins Farm site, that has operated independently until 2010; it has not yet been inventoried or assessed regarding cultural resource preservation, visitor experience, visitor access, or management.

As part of the planning process, the DCP/EA evaluated three alternatives, including a no-action alternative and two action alternatives (alternative 2 and alternative 3). Alternative 2, the selected alternative, presents a reasonable and feasible approach that meets the purpose of and need for action. This Finding of No Significant Impact (FONSI) documents the decision of the NPS to implement the selected alternative, which is referred to as the preferred alternative / proposed action (alternative 2) in the EA. Alternative 2 includes addressing the impacts of past intrusions to the historic battlefield, particularly to the integrity and interpretation of the landscape, history, and cultural heritage of the site from actions related to Old Battleground Road and the existing visitor center. Alternative 2 also includes the acquisition, removal, and revegetation of the entirety of Old Battleground Road within the project area, eliminating non-park-related vehicular access. The existing visitor center will also be removed. The removal of this non-contributing infrastructure from the cultural landscape will reduce the maintenance burden for the park and allow the flexibility to provide visitor experiences that better align with the park

¹ Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and a Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 et seq. Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The National Park Service verifies that it has complied with the requirements of NEPA, including the Department's regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and Part 516 of the Departmental Manual, consistent with the President's January 2025 Order and Memorandum. The National Park Service has also voluntarily considered the Council on Environmental Quality's rescinded regulations implementing NEPA, previously found at 40 C.F.R. Parts 1500– 1508, as guidance to the extent appropriate and consistent with the requirements of NEPA and Executive Order 14154.

purpose. These actions will improve circulation and interpretation throughout the park. Many actions proposed for alternative 2 are also proposed under alternative 3. The primary differences between alternatives 2 and 3 include only a partial acquisition, closure, and removal of Old Battleground Road within the park boundary, whereas alternative 2 will close the entire portion of Old Battleground Road within the park boundary.

To the extent necessary, relevant sections of the DCP/EA are referenced below.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Based on the analysis presented in the DCP/EA, the NPS selected the preferred alternative (alternative 2) after an evaluation of the feasibility of several potential alternatives. The alternatives considered but dismissed are summarized in Chapter 2 of the DCP/EA. Under the selected alternative, the NPS will address the impacts of past intrusions to the historic battlefield, particularly to the integrity and interpretation of the landscape, history, and cultural heritage of the site from actions related to Old Battleground Road and the existing visitor center. The changes to the historic structure and cultural landscape, new lands management, and visitor use, experience, and safety are outlined in detail in Chapter 2 of the DCP/EA.

The selected alternative will restore the contiguous character of the battleground landscape, to the extent possible, reminiscent of the historic battlefield in 1781. The entire portion of Old Battleground Road (approximately 1,622 feet of roadway) within the park boundary will be acquired, closed, and removed. The current roadway alignment will be removed and revegetated with native hardwoods and understory species, consistent with recommendations in the 1997 GMP and 2003 Cultural Landscape Report. The existing crosswalk across Old Battleground Road will remain and connect the existing trail segments. Additionally, the existing visitor center and adjacent parking area will be removed as an interrupting feature in the center of the historic battleground and replaced with a smaller-scale visitor contact station near Hoskins Farm. Moreover, roadways will be reoriented to allow for an adjusted tour route sequence. The Hoskins Farm site will become stop 1 on the tour route, which is more representative of events of the battle as it occurred on March 15, 1781 (figure 2).

The selected alternative will improve the Hoskins Farm site, to the extent feasible, to reflect the conditions and landscape of the battlefield era and to support improved interpretation of the battle story. This rehabilitation effort will include providing features such as paths, gardens, trees, working locations, fences, and other features of an 18th century working farm.

To improve visitor use, experience, and safety, the selected alternative will provide visitors with opportunities to learn about and experience park resources. The current visitor center and associated parking area will be removed, and a new smaller-scale visitor contact station will be constructed on previously disturbed areas at Hoskins Farm to serve as the primary visitor contact and access point. This location will allow the visitor contact station to better integrate Hoskins Farm into the overall experience at the park. In addition, a safe and accessible trail network will be extended to all new parklands, with approximately 4,500 linear feet (approximately 0.85 miles) of new trails being installed. In addition, approximately 840 linear feet (approximately 0.16 miles) of existing social trails will be formalized at key locations to provide access from existing activity nodes in the park, while others will be removed and revegetated. Furthermore, a visitor contact pavilion will be constructed on the eastern park boundary, accessed by the tour loop or by a pedestrian trail from Lawndale Drive. This pavilion will provide appropriate recreational and education use, aiding in the interpretation of the Guilford Courthouse location and the end of the battlefield story at the Third defensive line. Finally, the selected alternative will change the existing entrance to the park and readjust the tour route sequence to provide better circulation for visitors to improve interpretation. This will involve the following actions:

- The primary access to the park will shift from the existing visitor center entryway to the access point along New Garden Road at the Hoskins Farm site, which will become tour stop 1. Vehicles

will be able to exit from the same entry area, via New Garden Road, or proceed along the tour route.

- Existing parking near the Hoskins Farm site will be repurposed to serve the new visitor contact station.
- Green Acres Lane will be incorporated into the park tour road, allowing for vehicular and pedestrian connections between the Hoskins Farm site and the main battlefield site. The existing barrier gate will be removed to allow for extensions of the tour route to connect to Green Acres Lane.
- Old Battleground Road will be closed to vehicular traffic along the portion that passes through the park, and the roadbed will be removed and revegetated consistent with cultural landscape treatment recommendations. Visitor parking will be added at the southern edge of the park boundary and terminus of Old Battleground Road.

Rationale

NPS selected alternative 2 (preferred alternative) because:

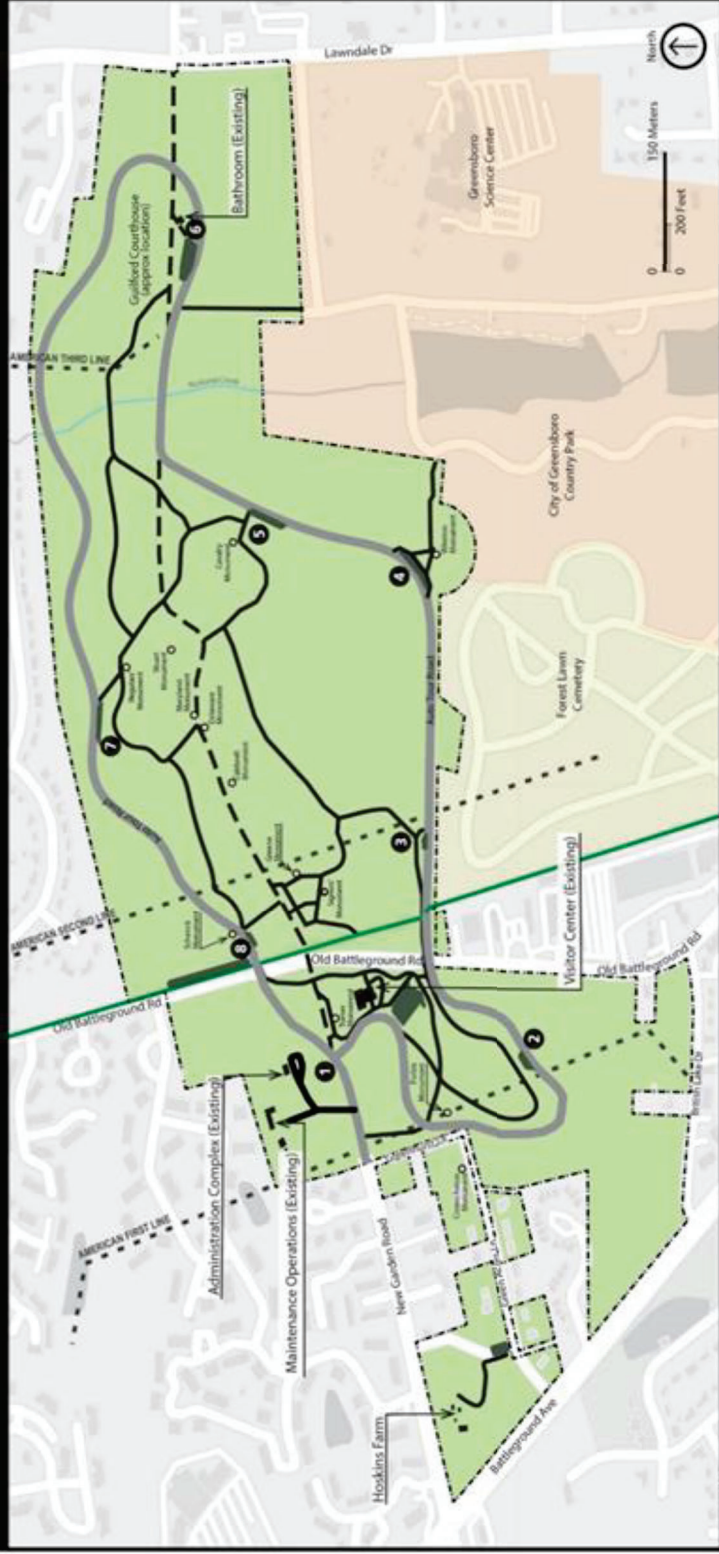
- It satisfies the purpose and need by guiding management of recent and planned land acquisitions, facilities, parking, roadways, trails, and future development or rehabilitation in the park's developed areas.
- It is consistent with the park mission to rehabilitate and interpret the authentic battlefield story and historic era.
- Resource protection measures and best management practices will avoid, minimize, and mitigate adverse environmental impacts.

Resource Protection Measures are discussed in Chapter 2 and appendix B of the EA. These protection measures are considered part of the selected alternative and will be implemented to avoid, minimize, and/or mitigate impacts on Park resources. The measures presented in appendix B of the EA are subject to the final design and approval of plans by the NPS and will be finalized during future design and construction phases. In the future, additional compliance may be necessary and will be conducted by the NPS.

Guilford Courthouse National Military Park



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Legend

- Existing Park Features
 - Existing Park Boundary
 - Existing Park Parcels
 - NPS Owned Parcels
 - Forest Lawn Cemetery
 - City of Greensboro Country Park
 - Existing Foot Trail
 - Historic Road Alignment
- Existing Auto Tour Route
- Existing Vehicle Circulation
- Parking Area
- Atlantic & Yadkin Greenway
- Existing Building
- Auto Tour Stop
- Monument



FIGURE 1. PROJECT AREA



FIGURE 2. PROJECT AREA - HOSKINS FARM SITE

OTHER ALTERNATIVES ANALYZED IN THE EA

In addition to the NPS selected alternative described above (alternative 2), the DCP/EA analyzed a no-action alternative and action alternative 3 (see Chapter 2 of the DCP/EA). The no-action alternative was not selected because it does not meet the purpose for and need of the project, nor will it address cultural landscape rehabilitation needs, concerns about new lands management, and it does not address visitor safety, access, and circulation. Alternative 3 addresses these elements to a greater extent than the no-action alternative, but to a lesser extent compared to the selected alternative. Alternatives considered but dismissed are summarized in Chapter 2 of the DCP/EA.

FINDING OF NO SIGNIFICANT IMPACT

In considering whether the effects of the selected alternative are significant, the NPS analyzed the potentially affected environment and degree of the effects of the action. In considering the degree of the effects, the NPS considered both short- and long-term effects and both beneficial and adverse effects.

POTENTIALLY AFFECTED ENVIRONMENT

As described in the DCP/EA, the selected alternative has the potential for adverse and beneficial impacts on the park and its resources, including visitor use and experience, cultural resources, socioeconomic conditions, and vegetation.

DEGREES OF EFFECTS OF THE ACTION

The NPS considered the following actual or potential project effects in evaluating the degree of effects for the selected alternative.

Beneficial and Adverse, and Short-term and Long-term Effects of the Selected Alternative

No significant impacts on resources were identified that will require analysis in an Environmental Impact Statement (EIS). Whether taken individually or as a whole, the impacts of the selected alternative do not reach the level of significance. The selected alternative will result in substantial long-term beneficial impacts.

Effects of the Selected Alternative

The following summary of effects has been incorporated from Chapter 3, “Affected Environment and Environmental Consequences,” of the DCP/EA (pages 37-68).

Visitor Use and Experience

Visitor Experience – Access, Circulation, and Wayfinding. The selected alternative will have short-term, adverse, and long-term, beneficial impacts to visitor use and experience from improving the park’s built environment. The selected alternative will remove Old Battleground Road inside the park (approximately 1,622 feet of roadway), as well as the existing visitor center and parking lot, and revegetate the area. The removal of this infrastructure from the park’s cultural landscape will provide long-term, beneficial visitor experiences that better align with the mission of the park.

The park’s trail network will be extended to all new parklands and approximately 4,500 linear feet (approximately 0.85 miles) of new trails will be installed. In addition, approximately 840 linear feet (approximately 0.16 miles) of existing social trails will be formalized at key locations to provide access from existing activity nodes in the park, and other social trails will be removed and revegetated.

New or updated wayfinding signage will be installed to allow visitors to more easily navigate the changing grounds, trails, and connections to the new lands. Additional long-term, benefits will include improving or adding interpretive signage and exhibits; providing additional access signage to the Hoskins

Farm site; extending the tour route road; and adding signage to provide additional or enhanced opportunities for visitors to learn about and understand the battleground.

The selected alternative will incorporate aspects of visitor use management (VUM) in the form of long-term tools and strategies for monitoring and managing visitor use and improving the visitor experience at the park. These VUM elements include indicators, thresholds, and visitor capacities identified in Appendix A of the DCP/EA. The park will implement a monitoring strategy measuring the number and types of visitor complaints or witnessed events of conflicts between different user groups on park trails and roads. Monitoring visitor complaints will help park staff better understand the frequency of conflicts between user groups and their geographic distribution across the park. Monitoring will also help staff gauge how overcrowding on park trails and roads negatively impacts the visitor experience. Management strategies employed to meet the established thresholds and the visitor capacity will have long-term, beneficial impacts on visitor experience in the park. This benefit includes ensuring that conflicts among different user groups are minimized and addressed, and that the amount and type of use is managed to meet the desired visitor experience.

Removal of the roadway and construction activities will have temporary, short-term, adverse effects on visitor experience and visitation. Construction activities could(?) temporarily restrict visitor access, diminish the aesthetics of the park, reduce scenic views, and eliminate opportunities for scenic views from the Hoskins Farm site. Following removal of Old Battleground Road, the elimination of vehicles traveling the road will result in reduced noise and air pollution and will improve the site's solemnity. By connecting to the Hoskins Farm site, visitors will have access to what served as the deployment area for British troops and a field hospital which will create a greater understanding of the historic events, and provide a more seamless, detailed account of the battle and history of the park. Therefore, long-term, beneficial impacts to visitor experience and visitation are expected after construction is complete.

Visitor Center and Parking. The selected alternative will result in long-term, beneficial impacts and short-term, adverse impacts related to the removal of the existing visitor center, and the construction of a new visitor contact station at the Hoskins Farm site.

Temporary, short-term, adverse impacts to visitor use and experience will result from construction activities. The park will remove the existing visitor center and construct a new visitor contact station at the Hoskins Farm site. The existing visitor center will remain open to serve the park visitors while the new visitor contact station at the Hoskins Farm site is constructed. The relocation of the existing visitor center will also alter traffic patterns within the park. Visitors will likely access the new visitor contact station and the additional auto tour stop at the Hoskins Farm site using Green Acres Lane. The existing parking area at the Hoskins Farm site will accommodate vehicle and pedestrian traffic associated with the new visitor contact station. This visitor contact station will interpret the Hoskins Farm site and serve as the first interpretative opportunity/stop for the battlefield tour loop. Additionally, the selected alternative will allow for expanded interpretative opportunities at the Hoskins Farm site, to the extent feasible, to commemorate the conditions and landscape of the battlefield era and improve interpretation of the battle story with improved access and connectivity. Furthermore, a visitor contact pavilion will be constructed on the eastern park boundary, accessed by the tour loop or by a pedestrian trail from Lawndale Drive. This pavilion will provide a level of recreational and education usages for the site's solemnity and aid in the interpretation of the Guilford Courthouse location and the battlefield story that ended at the Third defensive line. Construction activities will also temporarily restrict visitor access and eliminate opportunities for interpretation at the Hoskins Farm site.

Long-term, beneficial impacts to visitor use and experience will result following the completion of construction. The selected alternative is expected to increase interpretative opportunities throughout the park. Through connection to the Hoskins Farm site, visitors will have access to what served as the deployment area for British troops, as well as a field hospital, and will therefore have a greater

understanding of the historic events. The visitor contact pavilion on the eastern park boundary will provide visitors with a space for interpretation, comfort, and recreation. Therefore, visitors will likely experience a more seamless, detailed account of the battle and history of the park.

Additional long-term, beneficial impacts will result from the construction of the new visitor contact station at Hoskins Farm; with the closure of the existing visitor center parking area, visitors will now park at the Hoskins Farm site parking area, which is currently underutilized. An additional parking area will also be constructed just south of the park along the remaining section of Old Battleground Road. This parking area will serve visitors using the park or the adjacent greenway, which will partially offset the loss of parking due to the removal of the parking area at the existing visitor center and also offer visitors another option to access the park.

Visitor Safety and Traffic. The selected alternative will result in short-term, adverse, and long-term, beneficial impacts to visitor use and experience from removing the existing visitor center and parking area and improving the park's built environment. Improvements to visitor safety, circulation, and interpretation will result from fully closing Old Battleground Road, which will improve the site's solemnity by reducing vehicle noise and air pollution and improving the visitor's connection across the park.

Construction activities could(?) temporarily restrict visitor traffic and create safety issues with potential pedestrian and construction equipment conflicts. However, upon completion of construction, long-term, beneficial impacts to visitor safety are expected as the probability of vehicular-pedestrian conflicts in the park will be reduced with the removal of Old Battleground Road. Additionally, visitor safety will improve from the removal of vehicle traffic and the reduction in the number of pedestrian conflict points across Old Battleground Road, as well as the removal of the pedestrian crossing along historic New Garden Road. Furthermore, by removing the Old Battleground Road and the auto tour route intersections, the signal at the northern intersection and the protected pedestrian movement will no longer be needed and will be removed.

However, traffic patterns will be adversely impacted in the long-term with the removal of Old Battleground Road, particularly for vehicles traveling through the area to reach other destinations. Traffic through the park will likely be rerouted to either Battleground Avenue or Lawndale Road, with most traffic likely shifting to Battleground Avenue. However, with the proposed construction of the STIP U-5892 project, which anticipates widening Battleground Avenue, the additional traffic is unlikely to have a noticeable impact on operations on Battleground Avenue.

Adverse impacts to visitor use and experience, such as removing the existing visitor center and parking area, will be eliminated once the new visitor contact station at Hoskins Farm is built and the new parking area is constructed. Adverse impacts associated with temporarily limiting access to areas of the site during construction will affect a subset of overall visitors and generally for just a portion of their visit. Visitors with limited mobility will be able to continue to use the tour road to park adjacent to various areas along the route.

Cultural Resources

Historic Structures and Cultural Landscapes. The selected alternative will result in short-term, adverse impacts during construction and long-term, beneficial impacts after construction on cultural resources. The selected alternative will not impact any of the monuments that contribute to the significance of the park.

Construction activities from the closure of Old Battleground Road and the removal of the existing visitor center, and associated parking areas will have short-term, adverse effects on park operations and cultural landscapes because of noise, dust, blocked roads and trails, and areas that may be temporarily closed. However, these impacts will be minimized by adhering to the resource protection measures, including

controlling fugitive dust by wetting soils to suppress dust, implementing noise abatement measures, and clearly indicating areas of concern due to cultural sensitivity.

Along with these changes a series of smaller actions will be made possible by, or required by, the removal of the visitor center and the closing of Old Battleground Road. The primary access point will be shifted to the access point along New Garden Road at the Hoskins Farm site, where a new visitor contact station will be constructed. The existing parking area at the new visitor contact station will be used to accommodate visitors; roads and trails within the park will be altered to accommodate the new traffic patterns along the tour road. The interpretive scheme will be changed to follow the course of the battle, beginning at Hoskins Farm Historic District where the British deployed, which will also require modifications to the trail network. Construction and demolition associated with these changes will have short-term, adverse effects on the cultural landscape, but they will have no long-term impact because the paved area and other modern intrusions will be roughly the same scale as the existing infrastructure.

The recommendations included in the road safety audit, as noted in Chapter 3 of the DCP/EA, will likely lead to additional changes to roadways and intersections; based on currently available information, these changes will be short term and minor. Ongoing road and trail maintenance will also have adverse effects on the cultural landscape, although these impacts will be generally short term. However, these impacts will be mitigated by adhering to the resource protection measures and through consultation with the North Carolina State Historic Preservation Office (NC SHPO).

Long-term, beneficial impacts on the battlefield landscape and the historic district will result from the full closure of Old Battleground Road and the removal of the existing visitor center and parking area from the center of the battlefield landscape. Additionally, a new visitor contact station will be established at the Hoskins Farm site within the Hoskins District boundary on previously cleared and disturbed land. The interpretive scheme will be changed based on the assumption that visitors will begin their exploration at the new visitor contact station at Hoskins Farm. These beneficial changes to the cultural landscape will bear a closer resemblance to the 18th century environment and will allow visitors to move through the park in a way that better follows the sequence of the fighting. Furthermore, reconfiguring the patterns of pedestrian and vehicle traffic will help achieve a more seamless visitor experience of the battlefield, which is a desired condition for the park.

Once construction activities are complete, additional long-term, beneficial impacts will result from the closure of Old Battleground Road and the removal of the existing visitor center, and associated parking areas, since these actions will give visitors a better sense of the historic landscape and a less divided experience of the battlefield.

The NPS has completed the section 106 consultation process with the North Carolina State Historic Preservation Office (NCHPO). NPS will continue to work with NCHPO, Tribal Nations, and other concerned parties to resolve any potential impacts associated with the project.

Socioeconomics

Socioeconomics. The selected alternative will not change community population trends, affect the availability of housing, or induce growth or development. Land areas adjacent to the project area have limited developmental potential, and most of the land surrounding the project area is already developed. No right-of-way acquisition or relocations of any residential or commercial properties will occur under the selected alternative. Additionally, with the permanent closure of Old Battleground Road, reduced through-traffic and improved access to recreational opportunities in the park could have a positive effect on property values, indirectly increasing tax revenues over time.

The permanent closure of Old Battleground Road in the project area will have short- and long-term, adverse impacts on the socioeconomic character of the community. During and after construction, visitors and community members accessing businesses along Old Battleground Road near the project area will be required to alter their current travel patterns to access these businesses when

traveling southbound on Old Battleground Road; direct access to these businesses will be maintained. Some businesses located on Old Battleground Road, south of the park, may (?)experience long-term, adverse impacts from decreased patronage when through-traffic is detoured to other roadways. However, these businesses are likely to see an increase in patronage from the construction of a new parking lot on the south side of the park, which may offset any decreased patronage. Businesses that do not depend on roadway visibility and immediate access by customers will not experience any short- or long-term, adverse impacts.

Portions of the park will remain open and accessible to the public during construction, to the extent possible to maintain safety. Community services near the project area, including the City of Greensboro Country Park and Jaycee Park, will likely experience increased visitation if areas of the park are restricted during construction activities. The new park amenities, including the new formalized trails and parking areas, rehabilitated cultural landscape, visitor contact station and pavilion, and wayfinding signage will have a long-term, beneficial impact for community members visiting the park. These new amenities will improve a valued community resource and are likely to increase visitation in and around the park.

Long-term, adverse impacts related to socioeconomic changes will be minimized through meaningful engagement with residents, visitors, and business owners in the project area in advance of construction activities, including providing detailed construction and detour plans on the park website, installing safe and visible directional signage, and working with public information officers to disseminate construction information to the public.

Noise and Air Quality. The selected alternative will have short- and long-term, adverse impacts related to noise and air quality on visitors and community members as a result of the closure and removal of Old Battleground Road in the project area. Project construction activities will involve the operation of various types of common construction equipment, including excavators, concrete saws, hoe rams, and jackhammers, to remove the asphalt on Old Battleground Road within the project area. The construction equipment will generate temporary increases in odors and emissions near the equipment operation, as well as temporary increases in noise levels due to equipment operation. However, the emissions, odors, and noise levels related to equipment operation are anticipated to dissipate rapidly, will not have impacts beyond the immediate site of the equipment, and will not be permanent. These construction activities will result in short-term, adverse impacts on the residents of the community due to increased exposure to noise levels and fugitive dust emissions. These impacts will be minimized by adhering to the resource protection measures, including controlling fugitive dust by wetting soils to suppress dust, maintaining the existing vegetation to the extent possible, limiting speed limits on paved roads, and limiting demolition work in high-wind conditions.

Once construction is completed and Old Battleground Road is permanently closed, the project is likely to affect noise levels near the project area from vehicle traffic being rerouted to different streets, including Lawndale Drive, British Lakes Drive, and Old Battleground Avenue. However, any rerouted traffic on Battleground Avenue and Lawndale Drive will result in minimal increases to the existing traffic noise levels and will result in no additional impacts to the overall community. Any rerouted traffic on British Lakes Drive will result in long-term, adverse impacts on the community from increased noise levels. However, these impacts will be minimized by adhering to the resource protection measures, including implementing standard noise abatement measures during construction.

Visitors and community members will experience long-term, beneficial impacts from improvements to the park's solemnity and air quality after construction is completed. With the removal of Old Battleground Road and the existing visitor center and adjacent parking area, these previously disturbed areas will be revegetated with native hardwoods and understory species, resulting in new native vegetation and green space for the park. These actions are likely to improve air quality and provide additional green space for the community once the native vegetation has reached maturity.

Mobility and Safety. The selected alternative will have short- and long-term, adverse and beneficial impacts on the community related to mobility and safety as a result of permanently closing Old Battleground Road. Short-term, adverse impacts to mobility and safety will be limited to construction activities. During construction, the number of construction vehicles and equipment traveling to and from the park will vary depending on the phase and the type of construction activity and will affect community members' ability to access portions of the park and the surrounding community. Given the scale of the improvement, the number of construction vehicles and equipment traveling to and from the park are not likely to interfere with existing traffic levels. However, the impacts will be minimized by adhering to the resource protection measures, including developing a traffic control plan with advanced warning signage, construction truck routes, maintenance of access and circulation within the park, and coordination with public service providers. Implementation of these measures will minimize disruption to the surrounding community, address public safety, and mitigate mobility concerns during and after construction.

Long-term, adverse impacts to mobility will result from the permanent closure of Old Battleground Road since existing vehicular traffic will be altered and rerouted to adjacent roadways. However, the remaining roadway network is expected to provide sufficient roadway capacity, connectivity, and mobility options within the local area. Short-term, adverse impacts to emergency response times are expected with the closure of Old Battleground Road as responders— similar to motorist— alter their routes and are rerouted to adjacent roadways. With these adjustments emergency response times will be within acceptable response standards, making this impact short-term. Through consultation with GDOT, an evaluation of the impacts of closing Old Battleground Road on the surrounding private properties during emergency response was conducted and were determined to be within acceptable response standards. Therefore, impacts will be minimized by adhering to the resource protection measures, including preemptive coordination with the local emergency response agencies to ensure familiarity with the roadway network and to maintain overall acceptable response times.

Long-term, beneficial impacts to safety in the park will result from the closure of Old Battleground Road since it will eliminate safety conflicts between vehicles traveling through the park and visitor vehicles and pedestrians in the park. The existing crosswalk across Old Battleground Road will remain and connect the existing trail segments. Traffic volumes on Old Battleground Road associated with cut-through traffic will be reduced, thereby reducing potential congestion along Old Battleground and improving mobility for the local community, including visitors accessing the park. Additionally, the development of an additional parking area at the terminus of Old Battleground Road at the southern edge of the park boundary will have beneficial impacts to park access and mobility.

Vegetation

The closure and removal of Old Battleground Road will result in short-term, adverse impacts and long-term, beneficial impacts on vegetation. The closure of the road and use of construction equipment for grading and ground clearing will damage or require the removal of the tree canopy over the roadway, resulting in short-term, adverse impacts to vegetation. Rehabilitation of the roadway will have long-term, beneficial impacts to vegetation.

The road will be closed, and construction equipment will be used to remove it, which will likely damage or require the removal of the tree canopy over the roadway and will disrupt vegetation through grading and ground clearing. These actions will result in short-term, adverse impacts to vegetation. However, the alignment will be revegetated with native hardwoods and understory species, resulting in approximately 0.8 acres (1,622 feet of roadway) of native vegetation for the park. Removal and revegetation of the roadway will have long-term, beneficial impacts to vegetation. Exotic plant species can spread during construction and planting activities; however, the park will minimize the potential for their spread by using fill material that meets NPS requirements to avoid the introduction of nonnative invasive plants.

The removal of the visitor center and adjacent parking area will have short-term, adverse impacts and long-term, beneficial impacts on vegetation. Removal of the visitor center and parking area will require grading and ground clearing that will disrupt existing vegetation (i.e., trees, understory, and cultivated meadow), resulting in short-term, adverse impacts to vegetation. However, once removal of the building and parking area are completed, the area will be revegetated with native hardwoods and understory species, resulting in approximately 0.76 acres of reclaimed forest for the park. Similar to the removal of Old Battlefield Road, the spread of exotic plant species is possible during construction and planting activities; however, the park will minimize the potential for the spread of exotic plant species by using fill material that meets NPS requirements to avoid the introduction of nonnative invasive plants.

With the removal of the existing visitor center, the park will construct a new visitor contact station at the Hoskins Farm site on previously disturbed ground. The existing parking area at the Hoskins Farm site will be used to accommodate the new visitor contact station. These actions will have short-term, adverse impacts on vegetation due to ground-disturbing construction activities and long-term, adverse impacts on vegetation due to the permanent removal of approximately 0.06 acres (approximately 2,500 square feet) of vegetation at the Hoskins Farm site. Similarly, the construction of the visitor contact pavilion on the eastern park boundary will have short-term, adverse construction impacts and long-term, adverse impacts due to the permanent removal of approximately 0.04 acres (approximately 2,400 square feet) of vegetation.

The extension of the trail network to connect the Hoskins Farm site to the main battlefield will remove approximately 0.41 acres (approximately 4,500 linear feet) of vegetation from the park, resulting in long-term, adverse impacts to vegetation. There will be fewer impacts from formalizing approximately 0.08 acres (approximately 842 linear feet) of social trails because the social trails proposed for formalization are previously disturbed and lack pristine vegetation. Long-term, beneficial impacts to vegetation are expected because visitors will use the formalized trails in lieu of creating new social trails.

The proposed shift of the existing visitor center entry way to the access point along New Garden Road will have long-term, adverse impacts, resulting in minor vegetation removal. No new roadway will be constructed to accommodate the change.

The development of an additional parking area at the terminus of Old Battleground Road at the southern edge of the park boundary will have short- and long-term impacts on vegetation. The use of construction equipment will disrupt existing vegetation (i.e., trees and understory) through grading and ground clearing, resulting in short-term, adverse impacts to vegetation. The construction of the parking area will permanently remove approximately 0.04 acres (approximately 1,920 square feet) of vegetation from the park, resulting in long-term, adverse impacts to vegetation.

Degree to Which the Selected Alternative Affects Public Health and Safety

Under the selected alternative, public health and safety will be improved with the removal of Old Battleground Road and its associated pedestrian signals, and pedestrian crossings along New Garden Road. This will remove vehicle traffic and the number of pedestrian conflict points across the road, improving safety for visitors. Upon completion of the selected alternative, visitors will also enjoy greater accessibility to recreational activities, and to the natural and cultural qualities of the park. There will be no significant impacts on public health, public safety, or unique characteristics of the region.

Effects That Will Violate Federal, State, Tribal, or Local Law Protecting the Environment

No highly uncertain or controversial impacts, unique or unknown risks, or elements of precedence were identified. The implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection laws.

AGENCY AND TRIBAL CONSULTATION

The NPS initiated consultation with relevant agencies, including the North Carolina State Historic Preservation Office (NC SHPO) during the preparation of the DCP/EA and provided a copy of the DCP/EA for review. This consultation is discussed in detail in Chapter 4 of the DCP/EA titled “Consultation and Coordination.”

North Carolina SHPO

Compliance with section 106 of the NHPA was conducted separately but concurrently with the planning process for the DCP/EA. As required by section 106, the NPS is consulting with the NC SHPO. On December 17, 2024, the NC SHPO concurred with the findings that the amphitheater, Old Battleground Road, and Holt Avenue are eligible for listing in the National Register as contributing elements to the Guilford Courthouse National Military Park Historic District. The NC SHPO also concurred that the remaining 14 properties reviewed in the NPS DOE do not contribute to the historic district. On May 24, 2025, the NC SHPO provided response to the NPS in a letter addressed to the Superintendent regarding the review of the DCP/EA. The letter outlined site-specific monitoring and survey recommendations before and during construction activities. On June 12, 2025, NPS sent a letter concurring with NC SHPO requests and documenting the completion of Section 106 compliance for the DCP/EA.

Tribal Nations

As required by section 106 of the NHPA, the NPS is consulting with federally recognized Native American Tribes that are culturally or historically affiliated in the region, including the Catawba Nation and the Eastern Shawnee Tribe of Oklahoma.

On June 2, 2025, the NPS initiated consultation with the Catawba Nation and the Eastern Shawnee Tribe of Oklahoma and requested review and comment on the DCP/EA within a 30-day review period. No comments were received from the Eastern Shawnee Tribe of Oklahoma. The Catawba Nation responded with no immediate concerns but requested to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of the project. The NPS will continue to work with appropriate Tribes to resolve any potential impacts associated with the project.

PUBLIC INVOLVEMENT

Public engagement prior to the release of the DCP/EA for public comment is described in Chapter 4 of the DCP/EA (page 69). The NPS issued a press release to local, regional, and national media outlets on April 28, 2025, announcing the release of the EA. The press release included a link to the NPS Planning, Environment, and Public Comment (PEPC) website, which initiated a 30-day public comment period. The NPS posted the EA and a supplemental newsletter to the PEPC website at the start of the public comment period. Comments were accepted from April 28 until May 30, 2025.

The NPS hosted a virtual public meeting on May 8, 2025, from 6:00 to 7:00 pm ET to present an overview of the project and provide attendees an opportunity to ask questions and submit comments. The NPS received 28 pieces of correspondences during the public comment period. In general, commenters supported the proposed action, including the NPS preferred alternative. No substantive public comments were received requiring changes to the DCP/EA document. The Public Comment Response Report is provided in attachment A.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an EIS. The selected alternative will not have a significant effect on the human environment in accordance with section 102(2)(c) of NEPA.

This finding is based on consideration of the Council on Environmental Quality and NPS guidance on the criteria for significance, regarding the potentially affected environment and degrees of effects of the impacts described in the DPC/EA (which is hereby incorporated by reference) and as summarized above.

ATTACHMENT A: PUBLIC COMMENT RESPONSE REPORT



Guilford Courthouse National Military Park

Development Concept Plan and Environmental Assessment

PUBLIC COMMENT SUMMARY REPORT

July 2025

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INTRODUCTION

The National Park Service (NPS) announced the release of the Development Concept Plan (DCP) and Environmental Assessment (EA) for Guilford Courthouse National Military Park on April 28, 2025. The DCP/EA was published on the NPS Planning, Environment, and Public Comment (PEPC) website at: <https://parkplanning.nps.gov/document.cfm?parkID=383&projectID=115962&documentID=143910>.

With the release of the DCP/EA, the NPS also opened a 33-day public comment period, from April 28, 2025, to May 30, 2025. The public was encouraged to submit comments through the PEPC website. Comments emailed, submitted in person, or mailed to park headquarters were also accepted, entered into PEPC, and included in the overall project record. This Public Comment Summary Report summarizes the concerns expressed during the public comment period.

The NPS hosted a virtual public meeting via Zoom on May 8, 2025, from 6:00 p.m. to 7:00 p.m. eastern time. During the meeting, the project planning team presented an overview of the project, provided attendees with an opportunity to ask questions, and shared information on how to submit comments.

DEFINITION OF TERMS

Correspondence: A correspondence is the entire document received from a commenter and includes letters, written comment forms, comments entered directly into the PEPC database, and any other written comments provided by postal mail, email, or in person at the park.

Comment: A comment is a portion of text within a correspondence that addresses a single subject, such as visual resources or mitigation measures. The comment could also question the accuracy of the information provided in the DCP/EA, question the adequacy of information in the DCP/EA, or present reasonable alternatives other than the potential concepts presented in the DCP/EA.

Code: A code is a grouping centered on a common subject, such as “Issues & Impacts: Parking” The codes were developed during the planning process and are used to track major subjects found in the DCP/EA. In cases where no comments are received on an issue, the code is not identified or discussed in this report.

Concern Statement: Concern statements summarize the issues identified by each code. Each code was characterized by concern statements to provide a better focus on the content of the comments.

COMMENT ANALYSIS METHODOLOGY

Comment analysis is a process used to compile and correlate similar comments into a usable format for decision-makers and the interdisciplinary project team. Comment analysis assists the NPS in organizing, clarifying, and addressing information pursuant to National Environmental Policy Act (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- developing a coding structure
- employing a comment database for comment management
- reading and coding of comments
- interpreting and analyzing the comments to identify issues and themes

- preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topic and issue. The NPS derived the coding structure from analyzing the range of topics discussed during the planning process, past planning documents, and the comments themselves. The coding structure was designed to capture the content of the comments rather than to restrict or exclude any ideas.

The NPS PEPC database was used to manage the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. The database tallies the total number of correspondences and comments received, sorts and reports comments by a particular topic or issue, and provides demographic information on the sources of each comment.

The public comment analysis involved assigning codes to statements made in comments received. All comments were read and analyzed, including opinions; suggestions; and comments of a technical, personal, or philosophical nature.

Under each code, all comments were grouped by similar themes, and those groups were summarized with a concern statement. Although the analysis process attempts to capture the full range of public concerns, this report should be used with caution. *Comments from people who chose to respond do not necessarily represent the sentiments of the entire public.*

CORRESPONDENCE RECEIVED

Tables 1 and 2 were produced by the PEPC database and provide information about the number of correspondences received, organized by correspondence type and distribution by state. A total of 65 individual comments were derived from the 28 correspondences received.

TABLE 1. CORRESPONDENCE DISTRIBUTION BY CORRESPONDENCE TYPE

Correspondence Type	Correspondences
Web Form	17
Letter	11

TABLE 2. CORRESPONDENCE DISTRIBUTION BY STATE

State	Correspondences
North Carolina	24
Virginia	1
Colorado	1
Unknown	2

SUMMARY OF COMMENTS

The summary of comments that were received during the EA public review period are provided below and organized by code. Each comment summary is also summarized into concern statements and followed by an NPS response.

During the public comment period, a range of perspectives were shared regarding the proposed alternatives. A significant number of commenters expressed strong support for alternative 2, which includes the full closure of Old Battleground Road and the relocation of the visitor center to the park's western edge. Supporters emphasized that these changes would enhance visitor safety, restore the battlefield's historical integrity, and improve interpretive flow by aligning the visitor experience more closely with the chronological sequence of the battle.

Conversely, several commenters voiced concerns about the proposed removal of the existing visitor center under alternative 2. They argued that replacing it with a smaller visitor contact station could diminish the park's educational value by limiting exhibit space and reducing public access to important artifacts. Many favored alternative 3, which retains and renovates the current visitor center, citing its central location, interpretive advantages, and perceived cost-effectiveness—particularly in light of the upcoming 250th anniversary of the battle.

Additional feedback included suggestions for hybrid alternatives and infrastructure coordination with local agencies, as well as calls to ensure accessibility, adequate parking, and the preservation of cultural resources.

AL2000 Alternative 2: NPS Proposed Action and Preferred Alternative

Concern Statement: Commenters expressed opposition to alternative 2, stating that removing the existing visitor center and building a new, smaller-scale visitor contact station would detract from the visitor experience by limiting the space available for exhibits and meetings and would result in storing important artifacts outside of public view. One commenter expressed concern about whether the new visitor center would include sufficient exhibits and information for visitors to understand the significance of the park in the Revolutionary War, noting that a visitor contact station would be a downgrade from a visitor center. Commenters stated that relocating the visitor center to Hoskins Farm would sever the relationship between historical elements like the First, Second, and Third Lines and the original alignment of New Garden Road, potentially disrupting the visitor experience. A commenter also worried that placing the visitor contact station at Hoskins Farm would disrupt the integrity of the site. A commenter asked how the NPS planned to share the complex story of the battle at the visitor contact station. One commenter asked the NPS to consider the costs associated with building a new visitor center as opposed to renovating the existing center.

NPS Response: During earlier phases of the planning process, the NPS considered several options for the visitor center in the park, including multiple factors related to maintaining the existing visitor center and creating a new visitor contact station. Although cost is not a required consideration in selecting a preferred alternative, nor is it required to be disclosed in a NEPA document, it is one of the multiple factors that the NPS takes into consideration when identifying a preferred alternative.

As noted in Chapter 2 of the DCP/EA, removing the existing visitor center will reduce the ongoing maintenance burden for the park and allow the flexibility to provide visitor experiences that better align with the purpose of the park. The existing visitor center interrupts the center of the historic battleground and the cultural landscape. By readjusting visitor access to begin at the Hoskins Farm site, it will provide

better circulation for visitors and improve historic interpretation. The visitor contact station will also be constructed on a previously disturbed area at Hoskins Farm to minimize disturbance.

The NPS will conduct a separate planning process for the design and construction of any new facilities or design elements at the park, which will be completed in accordance with the appropriate NPS design standards. The design plans have not yet been developed. Therefore, the NPS will take these concerns under advisement during future management decisions related to maintaining and exhibiting cultural resources in the park.

AL3000: Alternative 3

AL4000: New Alternatives and Elements

Concern Statement: Commenters proposed the following new alternatives and alternative elements:

- Placing the new visitor center across the existing New Garden Road near Old Battleground Road instead of closer to Hoskins Farm, so that it would not lengthen the walking distance for people or interfere with historical areas
- Implementing a combination of alternatives 2 and 3 that would include closing Old Battleground Road and removing and relocating the visitor center to the Hoskins Farm area but ensuring that the new visitor center is large enough to provide a museum-type experience to visitors
- Partnering with local governments to find a larger facility that would increase the size of the museum, auditorium, and other facilities

NPS Response: During earlier phases of the planning process, the NPS considered several options for the visitor center in the park, including multiple factors such as cost, feasibility, and impacts related to maintaining the existing visitor center and creating a new visitor contact station. Although cost is not a required consideration in selecting a preferred alternative, nor is it required to be disclosed in a NEPA document, it is one of the multiple factors that the NPS takes into consideration when identifying a preferred alternative.

As noted in Chapter 2 of the DCP/EA, removing the existing visitor center will reduce the ongoing maintenance burden for the park and allow the flexibility to provide visitor experiences that better align with the purpose of the park. Additionally, the existing visitor center interrupts the center of the historic battleground. Readjusting visitor access to begin at the Hoskins Farm site will provide better circulation for visitors and improve historic interpretation. The visitor contact station will also be constructed on a previously disturbed area at the Hoskins Farm site to minimize disturbance.

The NPS will conduct a separate planning process for the design and construction of any new facilities or design elements at the park, which will be completed in accordance with the appropriate NPS design standards. The NPS will take these concerns and suggestions under advisement during future management decisions.

IS1000 Issues & Impacts: Old Battleground Road Closure

Concern Statement: The City of Greensboro Department of Transportation (GDOT) provided several comments related to the closure of Old Battleground Road. They stated that Greensboro City Council approval would be required to close any portion of Old Battleground Road. GDOT noted that the process steps and required improvements have been communicated to the NPS by city staff, which include constructing a turnaround at the end of public streets, and GDOT has asked that these details be mentioned in the final DCP. GDOT also noted that city staff have evaluated the impacts of closing Old

Battleground Road on the surrounding private properties during emergency response. They found that the impact would be within acceptable response standards and that vehicle through-trips would be redistributed to the remaining road network, which can accommodate additional trips. GDOT also recommended closely coordinating the timing of the closure of Old Battleground Road with the construction of the North Carolina Department of Transportation's (NCDOT's) project U-5832 on Battleground Avenue adjacent to the park and coordinating with GDOT regarding any removal of traffic signals and signage. GDOT requested that details of this coordination be documented in the final DCP.

NPS Response: The NPS will continue to coordinate with GDOT and the NCDOT throughout the implementation of the preferred alternative. The NPS will also adhere to all relevant state and local standards for the acquisition and removal of Old Battleground Road in the park, as appropriate.

The NPS will conduct a separate planning process for the design and construction of any new facilities or design elements at the park, which will be completed in accordance with the appropriate NPS design standards.

IS2000 Issues & Impacts: Parking

Concern Statement: One commenter requested that the NPS ensure adequate parking at the new entrance if Old Battleground Road and the existing visitor center are removed.

NPS Response: The NPS will conduct a separate planning process for the design and construction of any new facilities or design elements at the park, which will be completed in accordance with the appropriate NPS design standards. The NPS will take these concerns and suggestions under advisement during future management decisions. As noted in the DCP/EA, the NPS is planning to provide new visitor parking at the southern edge of the park boundary and terminus of Old Battleground Road, as well as at the Hoskins Farm site.

IS3000 Issues & Impacts: Cultural Resources

Concern Statement: Commenters expressed concern about where the park's museum collection would be moved and expressed opposition to moving artifacts into storage, noting that artifacts are important to telling the story of the battle and supporting the park's purpose.

NPS Response: The current museum program and collection storage does not currently meet the best standards as outlined in the 2023 Southeast Region Museum Storage Plan. The park currently lacks dedicated museum staff, specifically a Curator. Maintaining the collection on site with a curator allows museum activities beyond the legal minimum, such as cataloging of existing collections, better preservation and conservation of fragile museum objects, and better monitoring of collections located off site at non-federal repositories. Public access to collections will also increase with dedicated staff to answer research requests and there will be dedicated monitored space for researchers to look at collections. Current collections space is located in a high traffic building which increases security risks. Purpose built facilities are not public and have appropriate security controls with restricted access. These facilities also have dedicated environmental controls such as automated low-level lighting, museum collections specific fire protection systems, HVAC systems that meet museum best standards, and not present in the current storage or while on display in the Visitor Center. The NPS will take these concerns and suggestions under advisement during future management decisions.

IS4000 Issues & Impacts: Natural Resources and Resource Management

Concern Statement: One commenter expressed concern about erosion caused by social trails and suggested removing invasive plant species and implementing a trail network that discourages the formation of social trails.

NPS Response: The NPS will conduct a separate planning process for the design and construction of any new facilities or design elements at the park, which will be completed in accordance with the appropriate NPS design standards. The design plans have not yet been developed.

However, as noted in the DCP/EA, the NPS will install approximately 0.85 miles of new trails and will formalize 0.16 miles of existing social trails at key locations to provide access from existing activity nodes in the park. The NPS will also remove and revegetate the other social trails that are not planned to be formalized in the park. Additionally, the NPS will continue to provide ongoing inspection for trail maintenance and vegetation removal in the park. The NPS will take these concerns and suggestions under advisement during future management decisions related to maintaining vegetation and social trails in the park.

IS6000 Issues & Impacts: Visitor Facilities and Experience

Concern Statement: A commenter requested that the NPS find ways to connect the Hoskins Farm area to the rest of the park to increase visitor awareness of the area's significance. A commenter asked that the NPS continue to educate and involve the public in supporting the park's preservation and sustainability.

NPS Response: The DCP/EA specifically addresses the rehabilitation of the cultural landscape, visitor use at the Hoskins Farm site, and visitor access and circulation in the park. As stated in Chapter 1, the purpose of the DCP/EA is to develop a plan to guide management of recent and planned land acquisitions, facilities, parking, roadways, trails, and any future development or rehabilitation in the park's developed areas.

The NPS developed the DCP/EA in accordance with desired conditions for the park as well as the specific issues and opportunities that were previously identified through an agency-led preliminary project planning process. Issues and opportunities were reviewed during this planning process to help define the scope of the plan and management concepts, including cultural landscape rehabilitation, new lands management, and visitor access and circulation. As noted in Chapter 2 of the DCP/EA, the NPS preferred alternative will improve the Hoskins Farm site (to the extent feasible) to reflect the conditions and landscape of the battlefield era and to support improved interpretation of the battle story. This rehabilitation effort will include providing features such as paths, gardens, trees, working locations, fences, and other features of an 18th century working farm.

The NPS will continue to provide updates throughout the planning and design process on the park website and other approved communication channels. For additional information on the project, please visit the park website at the following link: <https://www.nps.gov/guco/learn/news/index.htm>.

IS7000 Issues & Impacts: Other

Concern Statement: One commenter requested that the NPS consider how the proposed changes may impact accessibility.

NPS Response: The NPS will conduct a separate planning process for the design and construction of any new facilities or design elements at the park, which will be completed in accordance with the appropriate NPS design standards. The design plans have not yet been developed.

As noted in the DCP/EA, the NPS will increase visitor access and circulation throughout the park, including providing additional parking, formalizing social trails, and reducing pedestrian-vehicular conflict points. The park currently provides accessible parking spots in the park, as per the Americans with Disabilities Act. To the extent feasible, the NPS will take these suggestions under advisement for future management decisions prior to the design and construction process.

Concern Statement: The Engineering Division of the City of Greensboro Department of Water Resources noted that the department needs to review the potential abandonment of the 12-inch water main along Old Battleground Road. They expressed that the water main may need to remain in place, and a utility easement may need to be granted to the City of Greensboro over the water line.

NPS Response: The NPS will continue to coordinate with the City of Greensboro Department of Water Resources throughout the duration of the planning and design process. The NPS will complete a separate design and construction process prior to developing final design plans for this project. If a utility easement is required, the NPS will obtain any necessary easements prior to construction and will adhere to all relevant state and local standards related to public utilities in the park, as appropriate.

Concern Statement: GDOT requested inclusion of recommended improvements detailed in the Road Safety Audit in the final DCP. These improvements include physically separating the city's Atlantic & Yadkin Greenway from traffic and parking in the overflow parking lot and installing speed control devices on New Garden Road. They also asked for the NPS to include transit amenities and pedestrian access points in the final DCP to improve pedestrian and transit user access and to help lessen the demand for parking.

NPS Response: The NPS is open to further discussions with GDOT regarding the Road Safety Audit. The NPS will complete a separate design and construction process prior to developing final design plans for this project. To the extent feasible, the NPS will take these suggestions under advisement for future management decisions prior to the design and construction process.

PN1000: Purpose and Need

Concern Statement: Commenters expressed concerns regarding the DCP/EA's alignment with the park's purpose. Commenters worried that the park would become even more focused on nonhistoric recreational use, rather than emphasizing commemoration of the Battle of Guilford Courthouse. A commenter expressed concern that subverting the park's purpose would violate the Organic Act.

NPS Response: As described in the DCP/EA, the purpose of Guilford Courthouse National Military Park is to preserve the battlefield and the accounts of the Battle of Guilford Courthouse during the Southern Campaign of the American Revolution for historical and professional military study, as well as the benefit, education, and inspiration of the public. As stated in Chapter 1, the purpose of the DCP/EA is to develop a plan to guide management of recent and planned land acquisitions, facilities, parking, roadways, trails, and any future development or rehabilitation in the park's developed areas.

The NPS developed the DCP/EA in accordance with the fundamental resources and values of the park, as well as the desired conditions and specific issues and opportunities that were previously identified through an agency-led preliminary project planning process. Issues and opportunities, including cultural landscape rehabilitation, new lands management, and visitor access and circulation, were reviewed during

this planning process to help define the plan's scope and management concepts. Therefore, the DCP/EA considers opportunities to expand the visitor circulation network, as appropriate, and improve the design of park trails and parking, wayfinding, and mode separation to improve circulation and reduce potential for visitor conflicts.

ATTACHMENT B: DETERMINATION OF NON-IMPAIRMENT

INTRODUCTION

This non-impairment determination has been prepared for the selected alternative, as described in the FONSI for the *Guilford Courthouse National Military Park Development Concept Plan and EA*.

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the US Department of the Interior and the NPS to manage units “to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 United States Code 100101).

NPS *Management Policies 2006*, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

An action constitutes impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the “particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the reasonably foreseeable impacts in question and other impacts.”

An impact on any park resources or values may constitute an impairment, but an impact is more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS 2006, Section 1.4.5).

The significance and importance of each resource analyzed have been informed by the Park’s enabling legislation and its foundation document (NPS 2014) as discussed in the following sections. As a basis for evaluating the potential for impairment or unacceptable impacts on the Park’s resources, the NPS relied on the *Guilford Courthouse National Military Park Development Concept Plan and EA*. Chapter 3 (“Affected Environment and Environmental Consequences”) of the DCP/EA analyzes direct, indirect, and reasonably foreseeable impacts on visitor use and experience, cultural resources, socioeconomics, and vegetation.

The purpose of the Park, along with park significance statements and a description of the park’s fundamental resources and values (FRVs), are described in the *Foundation Document for Guilford Courthouse National Military Park*. The park’s purpose statement is as follows:

“The purpose of Guilford Courthouse National Military Park is to preserve for historical and professional military study as well as the benefit, education, and inspiration of the public, the battlefield and the accounts of the Battle of Guilford Courthouse during the Southern Campaign of the American Revolution.” (NPS 2014).

A non-impairment determination is not necessary for visitor use and experience or socioeconomic impacts because these impact topics are not generally considered a park resource or value subject to the non-impairment standard (see NPS 2006, section 1.4.6). Impacts on other resources that are subject to a non-impairment determination include archeological resources, viewshed and visual resources, geology and soils, air quality, floodplains, threatened and endangered species, wetlands, and natural soundscapes. After review of the alternatives and potential impacts, the NPS determined that the impacts will be so minor that they were not carried forward for further analysis in the EA and will not result in impairment (see Chapter 1 of the EA for the rationale of dismissal for each environmental issue). The impacts to these resources are small and insignificant, and these resources will remain available for the enjoyment of current and future generations. Therefore, the resources will not be impaired by implementation of the selected alternative. While a written determination is not required for a determination of unacceptable impacts, after review of the actions and impacts, the NPS determined that the selected alternative will not result in unacceptable impacts to park resources.

NON-IMPAIRMENT EVALUATION BY RESOURCE

Cultural Resources

The protection of the “Guilford Courthouse Battleground, Three American Battle Lines, Hoskins Farm Site, Courthouse Site, Major General Green Monument, New Garden Road, and other monuments directly related to the battle and/or Guilford Battleground Courthouse” are identified as 6 of the 7 listed Fundamental Resources and Values (FRVs) in the foundation document (NPS 2014). Implementation of the selected alternative will not constitute a long-term, adverse effect to known historic resources, archaeological resources, or cultural landscapes because demolition and construction-related activities will not diminish the integrity of design, association, or location of these resources. In areas where the proposed improvements will alter the contributing resources, it will not be in a way that will compromise the resource’s eligibility for the National Register. As discussed in appendix B of the EA, any inadvertent impacts will be mitigated by adhering to the resource protection measures, including documenting all historic properties and including treatment measures, and locating equipment and materials staging areas to avoid known cultural resources.

The NPS conducted consultation with the NC SHPO under section 106 of the NHPA. Implementation of the Development Concept Plan will allow for the rehabilitation of the cultural landscapes in a manner consistent with the desired conditions and interpretive goals for the National Military Park. The treatment recommendations for the cultural landscape to remove and revegetate the entire portion of Old Battleground Road are consistent with recommendations in the 2003 CLR and the Secretary of the Interior’s Guidelines for the Treatment of Cultural Landscapes and Standards for the Treatment of Historic Properties. Therefore, implementation of the selected alternative will not result in impairment of cultural resources on NPS lands.

Vegetation

The protection of vegetation, as it relates to maintaining the “Guilford Courthouse Battleground, Three American Battle Lines, Hoskins Farm Site, and Courthouse Site” is identified as 4 of the 7 listed FRVs in the foundation document (NPS 2014). The selected alternative will have short-term, adverse impacts on vegetation during construction as a result of tree canopy removal, grading, and ground clearing, as well as long-term, adverse impacts after construction due to the permanent removal of vegetation for the new visitor contact station, visitor contact pavilion, and parking area, along with the extension of the trail network, and the access shift along New Garden Road.

However, resource protection measures (see appendix B of the DCP/EA), such as using fill material that meets NPS requirements to avoid the introduction of nonnative invasive plants, and revegetating disturbed area with a native seed mix, will minimize adverse impacts and will support the Park’s FRV in protecting natural resources. Additionally, the park will remove approximately 0.66 acres of vegetation,

but will revegetate approximately 1.56 acres, thereby resulting in a net gain of approximately 0.9 acres. Therefore, implementation of the selected alternative will not result in impairment of vegetation.

Summary

The NPS has determined that the implementation of the selected alternative will not constitute impairment of the resources of the park. This conclusion is based on consideration of the park's purpose, significance, fundamental resources and values, and a thorough analysis of the environmental impact described in the DCP/EA; comments provided by the public and other stakeholders; and the professional judgement of the decision-maker guided by the direction in NPS *Management Policies 2006*.

As was documented in the DCP/EA, the selected alternative was found to have no long-term impacts on other resources such as archeological resources, viewshed and visual resources, geology and soils, air quality, floodplains, threatened and endangered species, wetlands, and natural soundscapes. See Chapter 1 of the DCP/EA for more information. The impacts to these resources are small and insignificant, and the resources will remain available to be enjoyed by current and future generations. Therefore, those resources will not be impaired by implementation of the selected alternative.

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- 2014 *Foundation Document*. Guilford Courthouse National Military Park. National Park Service, North Carolina. August.