

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1850 Arch Street Philadelphia, Pennsylvania 19103-2028

AUS 3 1 1998

Ms. Rebecca Harriett Superintendent Booker T. Washington National Monument 12130 Booker T. Washington Highway Hardy, VA 24101-9688

Re: Booker T. Washington National Monument, Virginia

Dear Ms. Harriett:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced project. EPA has assigned this DEIS a rating of LO-1 (Lack of Objections/Adequate), which indicates that we have no objections to the proposal and that the DEIS adequately addressed the environmental impacts of the preferred alternative. However, the following comments should be addressed in the Final Environmental Impact Statement (FEIS). A copy of EPA's ranking system is enclosed for your information.

- As stated on page 126 of the DEIS, a portion of the study area lies within the 100-year floodplain. The proposed alternative suggests relocating eroded portions of the Jack-O-Lantern Branch Trail away from Gills Creek (floodplain area) to avoid flooding that occurs on the Trail several times a year. Project planning should be coordinated with the Federal Emergency Management Agency (FEMA). Since FEMA was not listed as a recipient of the DEIS, EPA suggests that they receive a copy of the FEIS.

- Page 143 states that "Relocation of washed-out sections of the Jack-O-Lantern Branch Trail away from Gills Creek may impact some localized wetlands, but long term impacts would be minimal." As noted on page 152 of the proposed mitigation "Any new trail construction would be designed to avoid wetland areas." EPA would like to emphasize the commitment to avoid impacts to wetland areas by identifying the fragmented wetlands on figures within the FEIS in conjunction with the relocated Jack-O-Lantern Trail proposed to be realigned away from Gills Creek.

Thank you for the opportunity to review and comment on this project. The staff contact for this review is Karen Del Grosso; she can be reached at 215-814-2765.

Sincerely,

Thomas A. Slenkamp, Deputy Director Office of Environmental Programs

Enclosure

# Section Four: Comments and Responses Concerning the Draft General Management Plan and Environmental Impact Statement



### United States Department of the Interior



BOOKER T. WASHINGTON NATIONAL MONUMENT 12130 Booker T. Washington Highway Hardy, Virginia 24101

IN REPLY REFER TO: D18 (BOWA)

September 30, 1999

Mr. Thomas A. Slenkamp Deputy Director Office of Environmental Programs USEPA, Region III 1650 Arch Street Philadelphia. PA 19103-2029

Dear Mr. Slenkamp:

Thank you for your response to the Booker T. Washington National Monument Draft General Management Plan. We will mail the Federal Emergency Management Agency (FEMA) a copy of the final environmental impact statement as it applies to the relocation of the Jack-O-Lantern Branch Trail. We will avoid impacts to wetlands with the trail relocation by using another already existing trail. If you have any further comments or questions please contact me at (540) 721-2094. Again, thank you for your help and comments.

Sincerely,

Rebecca L. Harriett Superintendent

Abbreviated Final General Management Plan and Environmental Impact Statement Booker T. Washington National Monument

Page 47

# Section Four: Comments and Responses Concerning the Draft General Management Plan and Environmental Impact Statement

James S. Gilmore, III

John Paul Woodley, Jr. Secretary of Natural



David G. Brickley Director

### COMMONWEALTH of VIRGINIA

#### DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street, Suite 326

TDD (804) 786-2121 Richmond, Virginia 23219-2010 (804) 786-2556

ginia 23219-2010 (804) /86-2556 FAX

August 5, 1999

Ms. Rebecca L. Harriett, Superintendent Booker T. Washington National Monument 12130 Booker T. Washington Highway Hardy, Virginia 24101

Dear Ms. Harriett:



Thank you for providing us an with the opportunity to review the Draft General Management Plan for Booker T. Washington National Monument. This plan provides an excellent description of the alternatives available to the National Park Service for addressing the future direction of this important resource in the Western Piedmont Region of Virginia.

Of the alternatives described in the Draft Plan, it appears to us that Alternative C would provide the most comprehensive approach to permit future visitors to have a proper understanding of Mr. Washington's place in history. The acquisition of the remaining 15 acres of the Burroughs Plantation would appear to be a vital component of protecting the original property. The enhanced educational and interpretive programming that would result from the revised system of waysides and exhibits would provide a better understanding of the life and works of Booker T. Washington. The objective of establishing additional partnerships to help protect the rural character of the site would appear to further protect the scene that the park service is attempting to portray.

The implementation of the Park Service's preferred alternative for the Booker T. Washington National Monument would also help to achieve a number of the objectives outlined in the 1996 Virginia Outdoors Plan related to the preservation and interpretation of important cultural, archaeological, and historic resources.

We look forward to hearing about additional details of the Park Service plans to expand the educational and interpretive programs delineated in the General Management Plan.

Thank you.

John R. Davy, Director

Division of Planning And Recreation Resources

cc: The Honorable David G. Brickley

An Agency of the Natural Resources Secretariat

Abbreviated Final General Management Plan and Environmental Impact Statement Booker T. Washington National Monument Page 48



## United States Department of the Interior



BOOKER T. WASHINGTON NATIONAL MONUMENT 12130 Booker T. Washington Highway Hardy, Virginia 24101

IN REPLY REFER TO: D18 (BOWA)

September 30, 1999

Mr. John R. Davy, Director Division of Planning and Recreation Resources Department of Conservation and Recreation 203 Governor Street, Suite 326 Richmond, VA 23219-2010

Dear Mr. Davy:

Thank you for your comments on the Draft General Management Plan/Environmental Impact Statement for Booker T. Washington National Monument. We have selected Alternative C as the preferred alternative. We found the 1996 Virginia Outdoors Plan to be extremely helpful in our planning process and glad that the implementation of our GMP will help achieve some of your agency objectives as well as ours. It takes all of us working together to preserve these important historic resources. We look forward to working with you in the future as we now tackle the job of implementation. Thank you for your assistance.

Sincerely,

Rebecca L. Harriett



### COMMONWEALTH of VIRGINIA

#### Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

John Paul Woodley, Jr. Secretary of Natural Resources

James S. Gilmore, III

Gauernar

Tel: (804) 367-2323 Fax: (804) 367-2391 TDD: (804) 367-2386

Director

H Alexander Wise J

July 29, 1999

July 29, 1999

Rebecca L. Harriett, Superintendent Booker T. Washington National Monument 12130 Booker T. Washington Highway Hardy. VA 24101

Dear Superintendent Harriett:

Thank you for the opportunity to comment on the BOWA General Management Plan.

I commend the Management Plan's introductory chapter on Purpose and Need for Action. I appreciated the information provided on the historic background of the park and the report's explicit realization that ideas of purpose and interpretation have changed significantly since the private sector creation of the park in 1940, the congressional creation of the National Monument in 1956, and the development of interpretive living history programs during the 1970s. The GMP correctly identifies new and more complex historical interpretations of Booker T. Washington's role as a principal leader of African Americans from 1885 to 1915, and it is now highly appropriate to reexamine the comprehensive interpretative mission to be accomplished by BOWA.

In my review of Alternative Proposals, I clearly reject Alternative A: No Action. It is necessary to take new steps to present the central story of Washington's life as a slave in Franklin County and to address the legacy of his life as a major African American leader during the late nineteenth and early twentieth centuries. Likewise, I reject the essentially passive interpretive role proposed for BOWA in Alternative B.

This leads me to a consideration of Alternatives C and D, and though I must confess to being torn between choosing between these two vastly referable alternatives, obviously I prefer the active interpretive roles proposed by both Alternatives C and D.

I support Alternative D insofar as I am dissatisfied with the present visitor center, which presents the visitor with an initial impression of an architecturally uninteresting structure

Petersburg Office 10 Courthouse Avenue Petersburg, VA 23803 Tel: (804) 863-1620 Fax: (804) 863-1627 Portsmouth Office 612 Court Street, 3rd Floor Portsmouth, VA 23704 Tel: (804) 396-6707 Fax: (804) 396-6712

Roanoke Office 1030 Penmar Avenue, SE Roanoke, VA 24013 Tel: (540) 857-7585 Winchester Office 107 N. Kent Street, Suite 203 Winchester, VA 22601 Tel: (540) 722-3427 Fax: (540) 722-7535

# Section Four: Comments and Responses Concerning the Draft General Management Plan and Environmental Impact Statement

that in no way reflects appropriately on Washington's life as a slave on the Burrough plantation—and I believe this is the story that BOWA is uniquely situated to tell. I also think that rehabilitation of one classroom at the former Booker T. Washington school while retaining the remainder of the building for office space will create a building of divided function that is neither fish nor fowl and will make interpretation there problematic.

My reservations to Alternative C would diminish if the present visitor center were truly enlarged in a creative way so as somehow to make its appearance reflective of the slave plantation life that Booker T, lived there during the first decade of his life.

I absolutely agree that archaeological investigations should continue so that interpretation of the cultural landscape of Booker T.'s childhood can be conducted in the most accurate and compelling manner. Similarly, archaeological testing should be continued so that the site of the Burrough's plantation house can be accurately depicted or "ghosted" and so that the Booker T. Washington slave cabin can be shown on its real site, if possible to determine, and so it can look as it did around 1860, not in its present overly substantial reconstruction. Did the Burrough's house have a tobacco barn around 1860, and if so, did it look like the one presently in place?

I really think that BOWA can best focus on Booker T. Washington's life as a slave on the plantation by using comprehensive cultural landscape, historical archaeology, and historic context research. All efforts with interpretation of the parkland should focus on this effort with fieldwork exhibits, interpretive signage, ghosted structures, and in-depth interpretation of slave life on a small Piedmont Virginia plantation. The remainder of Washington's life can then be interpreted in expanded visitor center exhibits.

Land use research should focus on the specific story of mid-nineteenth-century slave life in the oldest and most populous state of the Confederacy. The possibilities of this research are well outlined in Alternatives C and D.

In summation, I would say that Alternative D seems best designed to fulfill the interpretive role I see as most significant for BOWA, but either Alternative C or D is vastly superior to Alternatives A and B.

I commend BOWA for undertaking a much-needed General Management Plan for the park, and the Virginia Department of Historic Resources looks forward to a continued partnership role in review and comment on the implementation of either Alternative D or C.

John R. Kern, Ph.D. Director RRPO

Abbreviated Final General Management Plan and Environmental Impact Statement Booker T. Washington National Monument Page 49 Section Four: Comments and Responses Concerning the Draft General Management Plan and Environmental Impact Statement

Abbreviated Final General Management Plan and Environmental Impact Statement Booker T. Washington National Monument Page 50



## United States Department of the Interior NATIONAL PARK SERVICE



BOOKER T. WASHINGTON NATIONAL MONUMENT 12130 Booker T. Washington Highway Hardy, Virginia 24101

IN REPLY REFER TO: D18 (BOWA)

September 30, 1999

Mr. John R. Kern, Ph.D. Director Roanoke Regional Preservation Office Department of Historic Resources 1030 Penmar Avenue, SE Roanoke, VA 24013

Dear John:

Thank you for taking the time to review and comment on the Draft General Management Plan for Booker T. Washington National Monument. Your ideas about and support for this historic site are always appreciated.

After careful consideration, the National Park Service has decided to implement Alternative C. Realization of this alternative will meet our interpretive program goals and facility needs. I agree with you about the current location of the visitor center. Mission 66 visitor centers were designed to be located "close" to the historic scene and are now considered an intrusion. In the future, Alternative D could be amended to the approved GMP if the funding becomes available. In fact we designed that alternative with flexibility in mind, but right now, it is just not feasible.

As we work to expand the current facility, we will consult with your office about design and space. We will also need assistance from your office on the historic resource study and register nomination for the Booker T. Washington School. Thank you for your support as we implement this General Management Plan.

Sincerely,

Rebecca L Hameth Rebecca L. Harriett Superintendent



DAVID R. GEHR

To:

ONER

Rebecca L. Harriett

US Department of the Interior

From: Kelly S. Coleman, VDOT Kelly Coleman

Subject: Booker T. Washington National Monument

Date: July 29, 1999

Thank you for the opportunity to comment on the above referenced project. All activities seem to be confined to the limits of the park. Impacts to traffic and the transportation system will be limited to questions of park access and the future overall growth of traffic in the surrounding area.

If additional information is required, please contact Ben Mannell at (804) 786-4739

WE KEEP VIRGINIA MOVING

### Section Four: Comments and Responses Concerning the Draft General Management Plan and Environmental Impact Statement



## United States Department of the Interior



BOOKER T. WASHINGTON NATIONAL MONUMENT 12130 Booker T. Washington Highway Hardy, Virginia 24101

IN REPLY REFER TO: D18 (BOWA)

September 30, 1999

Ms. Kelly S. Coleman Virginia Department of Transportation 1401 East Broad Street Richmond, VA 23219-1939

Dear Ms. Coleman:

Thank you for taking the time to review the Draft General Management Plan/Environmental Impact Statement for Booker T. Washington National Monument. The majority of the activities are within the limits of the park, but I'm sure we will be working with VDOT during the lifetime of this GMP on issues of common concern like park access and highway by-pass as the flow of traffic in the area increases.

Sincerely,

Klbecea J. Hameth Rebecca L. Harriett Superintendent

Abbreviated Final General Management Plan and Environmental Impact Statement Booker T. Washington National Monument Page 51

# Section Four: Comments and Responses Concerning the Draft General Management Plan and Environmental Impact Statement

COUNTY OF FRANKLIN

**Board of Supervisors** 

Office of County Administrator

40 East Court Street

Rocky Mount, VA 24151

E-Mail: franklinco@cablenet-va.com



Macon C. Sammons, Jr. County Administrator Phone (540) 483-3030 FAX (540) 483-3035

August 4, 1999

Rebecca Harriett, Superintendent Booker T. Washington National Monument 12130 Booker T. Washington Highway Hardy, Virginia 24101

Re: Draft GMP/EIS for the Booker T. Washington National Monument

Dear Ms. Harrriett:

On behalf of the County, thank you for the public hearings held in the County on July 19<sup>th</sup> and 20<sup>th</sup> for the draft management alternatives. We support the efforts to sustain and enhance the monument as a priceless national treasure we are proud to have within the borders of our County, and we appreciate the thoughtful alternative studies provided. Our request is that the National Park Service provide the continued maintenance and improvements contemplated which are in the best interest of the monument and the public, giving consideration to the comments shared during the planning process.

Thank you for this opportunity to comment.

Sincerely,

Bonnie L. Newlon
Acting County Administrator

BLN/chs

"The Land between the Lakes and the Blue Ridge"

Abbreviated Final General Management Plan and Environmental Impact Statement Booker T. Washington National Monument Page 52



W. Wayne Angell Blackwater District

Hubert L. Quinn Blue Ridge District

John W. Helms

Gills Creek Distric

Charles D. Wagne

Page A. Matherly

Jerre C. Lumsder

Boone District Donald L. Riddle, S

RM.

## United States Department of the Interior

BOOKER T. WASHINGTON NATIONAL MONUMENT 12130 Booker T. Washington Highway Hardy, Virginia 24101

IN REPLY REFER TO: D18 (BOWA)

September 30, 1999

Ms. Bonnie Newlon Acting County Administrator Office of County Administration 40 East Court Street Rocky Mount, VA 24151

Dear Bonnie:

Thank you for attending the public meeting and reviewing the Draft General Management Plan/Environmental Impact Statement for Booker T. Washington National Monument. We will proceed with implementing Alternative C as explained in the draft plan. This alternative will best preserve the rural quality of the plantation setting which is critical to site interpretation and environmental integrity while ensuring a high quality visitor experience. This alternative also compliments the goals established in the Franklin County Comprehensive Plan and the supplemental "Vision" document for Smith Mountain Lake.

We look forward to working with the County on the Westlake Corner Community Plan and appreciate your support for Booker T. Washington National Monument.

Sincerely,

Rebecca L. Harriett Superintendent



NORTHEAST REGIONAL OFFICE

11 August 1999



Rebecca L. Harriett, Superintendent Booker T. Washington National Monument 12130 Booker T. Washington Highway Hardy, Virginia 24101

#### Dear Rebecc

The National Parks and Conservation Association is pleased to submit these comments on the Draft General Management Plan/Environmental Impact Statement for the Booker T. Washington NM. NPCA is America's only private nonprofit clitzen organization dodicated solely to protecting preserving, and enhancing the U.S. National Park System. An association of "Citizens Protecting America's Parks," NPCA was founded in 1919, and today has over 400,000 members.

NPCA is pleased to endorse Alternative C as the proposed alternative. This alternative offers the park the best strategy for meeting the park's goals. We are especially supportive of the boundary expansion proposed under this alternative. Maintaining the rural quality of the plantation setting is crucial to site interpretation and ensuring a high quality visitor experience. NPCA is pleased that this alternative will increase access and use of the park's collection, hopefully resulting in greater understanding of Booker T. Washington and the site.

If you have any question regarding our comments, please call me at 617-354-8940.

Eileen Woodford
Northeast Regional Director



#### Northeast Regional Office

P.O. Box 382372, Cambridge, MA 02238-2372 Tel: (617) 354-8940 • Fax: (617) 354-8655 EileenNP@aol.com National Office

1776 Mass. Ave., N.W., Washington, D.C. 20036 Tel: (202) 223-6722 • Fax: (202) 659-0650 http://www.npca.org • AOL Keyword: PARKS

G

### Section Four: Comments and Responses Concerning the Draft General Management Plan and Environmental Impact Statement



# United States Department of the Interior NATIONAL PARK SERVICE



BOOKER T. WASHINGTON NATIONAL MONUMENT 12130 Booker T. Washington Highway Hardy, Virginia 24101

IN REPLY REFER TO: D18 (BOWA)

September 30, 1999

Ms. Eileen Woodford Northeast Regional Director P.O. Box 382372 Cambridge, MA 02238-2372

Dear Eileen:

Thank you for taking the time to review the Booker T. Washington National Monument Draft General Management Plan/Environmental Impact Statement. As you stated "maintaining the rural quality of the plantation setting is critical to site interpretation and ensuring a high quality visitor experience" which is articulated best in Alternative C. We appreciate all the support that NPCA has given to Booker T. National Monument and hope that support will continue as we proceed in implementing this plan.

Sincerely,

Rebecca L. Harriet

Abbreviated Final General Management Plan and Environmental Impact Statement Booker T. Washington National Monument Page 53 Section Four: Comments and Responses Concerning the Draft General Management Plan and Environmental Impact Statement



Dear Madame.

In response to your question about improvements to Booker T. Washington Monument, I would offer the following suggestions. First, the school should be restored. This would mean removal of all maintenance supplies out of the classrooms.

Second, a maintenance building would need to be added. It would store the aforementioned supplies. An added bonus would be everything is more readily located and easier access to supplies.

Third, a pavilion or overhang used for a picnic area by the Booker T. Washington reunion committee and church organization. And finally, expansion of the visitation center to seat 300 to 500 people.

Booker T. Washington monument and school are a beautiful part of Franklin County history. It deserves to remain as such into the new millenium

Rev. Cyrus Taylor

Abbreviated Final General Management Plan and Environmental Impact Statement Booker T. Washington National Monument Page 54



#### United States Department of the Interior NATIONAL PARK SERVICE



**BOOKER T. WASHINGTON NATIONAL MONUMENT** 12130 Booker T. Washington Highway Hardy, Virginia 24101

IN REPLY REFER TO: D18 (BOWA)

September 30, 1999

Reverend Cyrus Taylor

Dear Reverend Taylor:

Thank you for attending the public meeting and your comments on the Draft General Management Plan for Booker T. Washington National Monument, We have decided to implement Alternative C which includes the expansion of the current visitor center and restoration of the Booker T. Washington School for public events. We have received funding in 2000 for a historic resource study for the school which will hopefully result in the school being nominated to the National Register of Historic Places. Once that is completed we will seek funding to restore the exterior of the school.

As you stated in your comments, a new maintenance/administrative facility will need to be built before the interior of the school can be restored. We are currently working on the plans for expanding the visitor center. Although I doubt if it is feasible to expand the facility to seat 300-500 people, we are working with an historic architect on various designs.

Again, thank you for your support and interest in the monument and the school. We look forward to working with you as we implement this plan.

Sincerely,

Superintendent