Addendum

The Wright Company Factory Boundary Assessment and Environmental Assessment

May 2006

This study was available for public review from January to March 2006. Because the changes to the study were minor, it was not reprinted. Instead, this addendum was created to complete the study. Included are:

1. Responses to comments on the boundary assessment
2. Errata sheet

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Responses to Comments on the Boundary Assessment

In January 2006, this document was mailed to individuals and local, state, and federal agencies and governmental institutions; was posted on the National Park Service's Planning, Environment, and Public Comment website; and was made available in public libraries throughout greater Dayton, Ohio. Comments on the study were due on March 17, 2006. A total of ten comments were received. All comments except the letter reproduced on the next page were summarized by two themes.

Comment	Response
Comment Theme 1: Would any of the proposed actions require the use of right-of-way or access points currently being controlled by the Ohio Department of Transportation?	**Response:** None of the proposed alternatives contemplate changing or adding access points to or from any road controlled by the Ohio Department of Transportation or using any right-of-way controlled by this agency.
Comment Theme 2: The Wright Factory Site should be given historic landmark status.	**Response:** Historical landmark status does not confer any responsibility on the owner to preserve the property or to make it available to the public. The owner has previously declined to support a nomination for landmark status.

Comment	Response
Dear Larry, On behalf of the trustees of the Aviation Heritage Foundation, I am pleased to provide comments on the subject WCFBA. Overall, we are very pleased to read the historical background information included in the Assessment as it has expanded our own knowledge of the site and given us an even greater appreciation of this national treasure. It makes the Foundation more determined to see the WCF site properly preserved and made available for all to experience. At a recent board meeting of the Aviation Heritage Foundation, the trustees unanimously adopted the following resolution: ***"Resolved, the Aviation Heritage Foundation, Inc. believes it is feasible and supports making the Wright Company Factory a unit of the National Park; it prefers Alternative B, Alternative D and Alternative C in descending order of preference."*** The Foundation remains concerned about the language in "Part 4. Findings" and the conclusion reached by the National Park Service that only if a financially viable partner is identified should this site be added to the boundary of the Dayton Aviation Heritage National Historical Park. The legislative tasking to the Park Service was to provide alternatives for incorporating the site as a unit of the Park. To include this language regarding a finding a partner in the document goes beyond the legislative tasking. Only if the Boundary Assessment process had included a formal and deliberative search for a partner would it be appropriate to include such a statement. It is recommended the last sentence in the first paragraph of "Part 4. Findings" be deleted. In closing, the Aviation Heritage Foundation, Inc. stands ready to advocate for incorporating the WCF into the Dayton Aviation Heritage National Historical Park. This will allow the Park to fully tell the story of the Wright brothers and their pioneering aviation work. The Dayton community has a proven track record of embracing and supporting this unique partnership park and we are confident this will continue as the park expands to a fifth site. Please feel free to call if you have any questions or if the Foundation can be of assistance in the future. Sincerely, Anthony F. Sculimbrene Executive Director Aviation Heritage Foundation, Inc. CC: Mary Mathews, Chair, Aviation Heritage Foundation, Inc.	**Response:** NPS agrees that it was tasked by Congress to "provide alternatives for incorporating the site as a unit of the park." In so doing, Congress directed NPS to conduct a "special resource study" to serve as the basis for developing such alternatives. As noted in the *Management Policies* of the NPS, such studies examine four criteria, one of which is feasibility. (Please see p. 1 of the Boundary Assessment.) The *Management Policies* state that "the feasibility evaluation also considers the ability of the NPS to undertake new management responsibilities in light of current and projected constraints on funding and personnel." The *Management Policies* further state, "An overall evaluation of feasibility will be made after taking into account all of the (listed) factors. However, evaluations may sometimes identify concerns or conditions, rather than simply reach a 'yes' or 'no' conclusion." Though it is beyond the scope of the study to identify the partner, it is the responsibility of the NPS to inform Congress of the financial realities of enacting any of the proposed alternatives. In light of current and projected restraints on the budget, NPS feels that the condition requiring a financially viable partner is in keeping with that responsibility.

Errata Sheet

Page 3. The upper map references “insert 1A,” which encompasses The Wright Cycle Company complex. That unit of Dayton Aviation Heritage National Historical Park is not included in this boundary assessment and environmental assessment for The Wright Company factory buildings. “Insert 1” refers to The Wright Company factory site, and there is no “insert 1A.”

Page 12, second full paragraph. Revise 2nd – 4th sentences as follows: “The Ohio Historical Society, a 501(c)3 organization, currently manages a system of 60 historic sites and museums. Of those, 36 are managed directly by Society staff and the other 24 are managed on a day-to-day basis by partner organizations and agencies.”

Page 12. Replace discussion of Carillon with this text: "Dayton History, created through the merger of Carillon Historical Park, Inc., and the Montgomery County Historical Society in August of 2005, now serves as a regional historical organization. This new regional organization:

- Owns and operates properties, including Carillon Historical Park and its five-story research facility in downtown Dayton, Ohio;
- Manages the Patterson Homestead Historic House Museum for the City of Dayton and the three-million item NCR Corporate Archive for the NCR Corporation; and
- Collects, preserves, interprets, presents, and promotes the region's assets, stories, and experiences.

As a new organization with limited funding, Dayton History is not in a position to assume an ownership, development, or management responsibility for The Wright Factory buildings."