Gettysburg National Military Park and Eisenhower National Historic Site

Trails Plan

Draft Environmental Assessment

November 2026

The NPS has considered the factors mandated by NEPA. This EA represents the NPS's good-faith effort to fulfill NEPA's requirements by prioritizing documentation of the most important relevant considerations within the statutorily mandated page limits and timeline. This prioritization reflects the NPS's expert judgment, and any considerations addressed briefly or left unaddressed are, in the NPS's judgment, comparatively non-substantive and would not meaningfully inform the NPS's consideration of environmental effects and the decision to be made. The EA is substantially complete, considers the factors mandated by NEPA, and, in the decisionmaker's judgment, contains analysis adequate to inform the NPS's decision regarding the proposed action.

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1 PURPOSE AND NEED FOR ACTION

1.1 Introduction

The National Park Service (NPS) proposes to develop a Trails Plan (Trails Plan) for Gettysburg National Military Park (NMP) and Eisenhower National Historic Site (NHS). The NPS seeks to improve visitor access to the parks' interpretive sites, and connections between the two parks by integrating existing trails with new trail alignments to create a network of trails that reduce reliance on vehicles while minimizing impacts to the battlefield, natural resources, and commemorative-era landscapes.

This environmental assessment (EA) evaluates the potential impacts of two alternatives: 1) take no action, and 2) adopt the Trails Plan that would include constructing new multi-use and pedestrian trails, rerouting existing equestrian trails, and adding interpretive elements where needed.

This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [USC] 4332[2] [C]), the Department of the Interior NEPA regulations (43 CFR Part 46), Part 516 of the Departmental Manual 1, and NPS Director's Order #12: Conservation Planning, Environmental Impact Analysis and Decision-Making (NPS, 2011). It also constitutes the park planning document required under 36 CFR 4.30(d)(1).

1.2 Background

Gettysburg NMP and Eisenhower NHS are located in Adams County, Pennsylvania, which is approximately 40 miles southwest of Harrisburg, Pennsylvania and 60 miles northwest of Baltimore, Maryland. Gettysburg NMP surrounds downtown Gettysburg, and Eisenhower NHS is directly adjacent to the southwest portion of Gettysburg NMP. The project area is shown in Figure 1.

1.2.1 Gettysburg NMP

Gettysburg NMP is the site of the American Civil War Battle of Gettysburg. The purpose of Gettysburg NMP is to preserve, protect, and interpret for this and future generations the resources associated with the 1863 Battle of Gettysburg during the American Civil War, the Soldiers' National Cemetery, and their commemorations. The battlefield was the inspiration for President Abraham Lincoln's immortal Gettysburg Address, delivered at the dedication of the Gettysburg National Cemetery on November 19, 1863. In addition to the battlefield, Gettysburg NMP includes the Gettysburg National Cemetery and numerous memorials and markers placed in commemoration of the battle by Civil War veterans. Gettysburg National Cemetery is the final resting place of 7,921 veterans, and their dependents, representing every major United States conflict between 1863 and 1972.

Efforts to preserve and protect the battlefield were underway prior to the formal establishment of Gettysburg NMP by enabling legislation adopted by Congress and signed into law on February 11, 1895. Today, Gettysburg NMP attracts just under one million visitors per year and is open year-round. Visitors primarily experience the battlefield by driving the self-guided auto tour route. Visitors can also immerse themselves in the battlefield on hiking trails, bicycle riding on park avenues, and horseback riding on designated trails. In addition, the park offers ranger-guided programs, a licensed battlefield guide service, bus tours, and audio tours.

Gettysburg NMP currently includes 6,034 acres of land, more than 1,328 monuments and markers, 368 cannons and carriages, and 106 historic structures (NPS, 2016). Most parklands are agricultural/pastoral in nature, with woodlots and woodlands accounting for a total of 1,258 acres, 112 acres of orchards, and 73.23 miles of fencing and stone walls (NPS, 2024).

1.2.2 Eisenhower NHS

Located adjacent to Gettysburg NMP, Eisenhower NHS preserves and interprets the home and farm of General Dwight D. and Mamie Eisenhower, the 34th President and First Lady of the United States. The site serves as a fitting and enduring memorial to the life, work, and times of President Eisenhower; as well as the events of far-reaching importance that occurred on the property. During the eight years of his presidency, the Eisenhowers used the farm as a weekend retreat, place to recover and heal, and a diplomatic tool. After Eisenhower's presidency, Dwight and Mamie retired to the only home they ever owned (NPS, 2024).

Consisting of 690 acres, Eisenhower NHS includes four distinct farms that are collectively named Eisenhower Farms: the Allen Redding farm (purchased in 1951 by the Eisenhowers), two adjoining farms (purchased by Eisenhower's associate W. Alton Jones), and an additional adjoining farm donated to the government to preserve the historic setting (NPS, 2016a). Eisenhower NHS includes bucolic farmland, meadows, pastures, riparian areas, and oak-hickory forest.

Since Eisenhower NHS's establishment in 1967, it has shared administration with Gettysburg NMP. The two parks have a common boundary and shared histories. The geographic proximity allowed for efficiencies gained by combining administrative, resource management, protective, and maintenance functions.

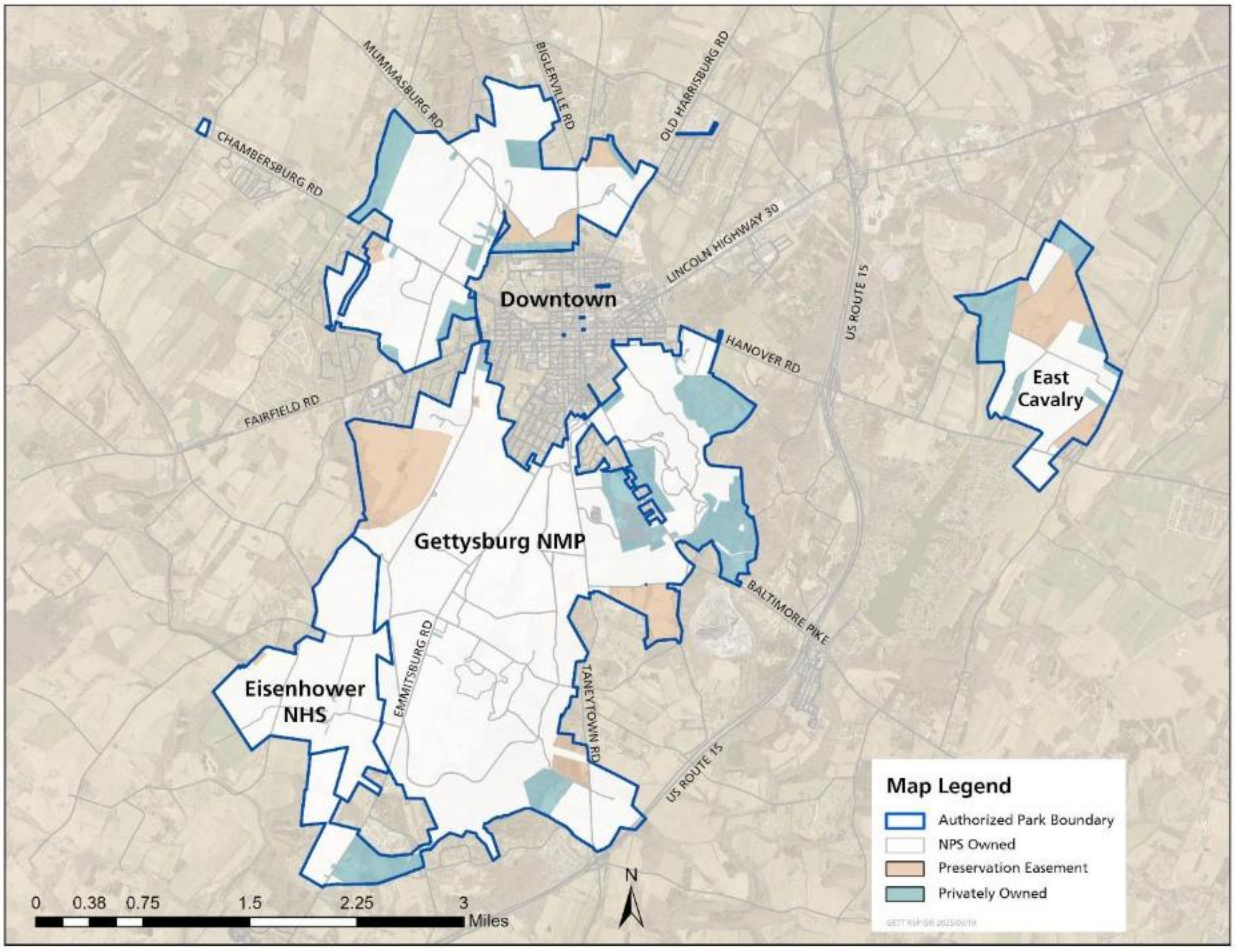


FIGURE 1. GETTYSBURG NMP AND EISENHOWER NHS COMPREHENSIVE TRAILS PLAN PROJECT AREA

1.3 Purpose and Need

The purpose of the Trails Plan is to establish a sustainable, context-sensitive trail network that improves visitor safety and access, connects Gettysburg National Military Park and Eisenhower National Historic Site with regional trail systems, expands opportunities to experience and understand park resources, and protects the parks' natural and cultural resources. The Trails Plan is needed to address the following conditions:

- Limited High-Quality Interpretation Opportunities: Many important park landscapes and stories are difficult to experience outside of a vehicle. Additional formal trail connections would expand opportunities for visitors to experience and understand park resources on foot or by bicycle.

- Peak Visitation Congestion: During peak visitation periods, vehicle and tour-bus traffic creates congestion at selected locations along the self-guided auto tour route and at visitor-use areas.

- Safety and User Conflicts: Much of the existing transportation system was designed primarily for vehicles. In some locations, pedestrians, bicyclists, and vehicles share the same travel corridor, creating safety concerns and conflicts among users.

- Resource Degradation: Where formal trails or clearly defined routes are absent, visitors may create unauthorized social trails. These routes can contribute to erosion, damage natural and cultural resources, and create routes that are not accessible to visitors with disabilities.

- Connection to Eisenhower NHS: Eisenhower NHS has limited formal non-motorized circulation outside the developed area surrounding the Eisenhower home. This limits opportunities to experience the broader farm landscape and its relationship to the Gettysburg battlefield.

The following sections describe these needs in greater detail.

Limited High-Quality Interpretation Opportunities

Gettysburg NMP has expanded physically and interpretively since establishment of the formal self-guided auto tour. Some important park areas located outside the formal avenue system, including South Cavalry Field, do not have clearly defined visitor access. Other sites, such as the rehabilitated James Warfield home, provide interpretive opportunities but lack a formal park-approved route for visitors. A more comprehensive trail network would expand opportunities to experience battlefield and commemorative landscapes as well as natural resources such as Rock Creek and Big Round Top that are currently less accessible or under-interpreted.

Peak Visitation Congestion

Visitor use at both parks continues to evolve. Visitors increasingly seek opportunities to walk, hike, and bicycle while experiencing park resources and stories. These changing patterns create a need for a broader range of safe, clearly defined visitor-access options and provide opportunities to engage new audiences.

At Eisenhower NHS, visitation and visitor behavior changed as access expanded beyond the former shuttle-only model. Visitors can now arrive by private vehicle, remain on site longer, and explore more of the property beyond the Eisenhower home. Longer visits and broader use of the site can slow parking turnover and contribute to congestion during peak periods.

At Gettysburg NMP, overall visitation has declined from earlier levels, but substantial vehicle congestion still occurs at selected locations along the auto tour route during peak periods, particularly at Little Round Top.

Safety and User Conflicts

Gettysburg NMP's transportation system was designed primarily for motor vehicles. Buses, carriages, Segways, bicycles, pedestrians, and other users now share portions of the same circulation system. Where dedicated non-motorized facilities are absent, pedestrians and bicyclists must use roadways with vehicles, increasing the potential for user conflicts and safety concerns. At Eisenhower NHS, bicyclists may use park roads, but visitors traveling between Gettysburg NMP and Eisenhower NHS currently lack a safe, dedicated connection and must use roads with posted speeds of up to 40 mph.

For decades, shuttle service shaped visitor access to Eisenhower NHS and limited demand for a broader trail system. Beginning in 2020, private-vehicle access expanded opportunities for visitors to experience the site independently. Activities now include walking, bird watching, dog walking, bicycling, and exploration beyond the Eisenhower home. These changes in visitor use have increased the need for safe non-motorized circulation within Eisenhower NHS and a direct connection to Gettysburg NMP.

Resource Degradation

In areas without formal or clearly defined trails, visitors may create informal routes, commonly called social trails. Repeated use of these routes can damage vegetation, contribute to erosion, and affect natural and cultural resources.

Connection to Eisenhower NHS

Eisenhower NHS has limited formal non-motorized circulation outside the developed area around the Eisenhower home. As a result, visitors traveling on foot or by bicycle have few

clearly defined opportunities to explore the broader landscape or connect with Gettysburg NMP.

1.4 Impact Topics

This section describes how the NPS identified which impact topics to retain for further analysis and which to dismiss. Impact topics represent resources that could be affected, either beneficially or adversely, by implementing any of the alternatives. When determining whether to retain an impact topic for more detailed analysis in this EA, the NPS considered whether:

- It is central to the development of the proposed trail plan or of critical importance;
- A detailed analysis is necessary to make a reasoned choice between alternatives;
- There is a lack of consensus among the public, tribes, and/or other agencies about environmental impacts associated with the issue; or
- Its impacts are potentially significant.

1.4.1 Impact Topics Retained for Further Analysis

After reviewing issues identified during internal scoping and civic engagement, the NPS identified several impact topics to organize discussion of the affected environment (i.e., Gettysburg NMP and Eisenhower NHS) and environmental consequences analysis.

The NPS identified the following impact topics for further analysis:

- Visitor use and experience;
- Cultural landscapes, historic structures, and archeological resources;
- Wetlands;
- Vegetation and habitat; and
- Threatened and endangered species.

Refer to Chapter 3 for an analysis of how each alternative would impact these resources.

1.4.2 Impact Topics Dismissed from Further Analysis

The following presents an overview of impact topics that the NPS considered but dismissed from further analysis in this EA.

Air Quality

Gettysburg NMP and Eisenhower NHS are located in Adams County, Pennsylvania, which is in attainment for all National Ambient Air Quality Standards (NAAQS) per the EPA Green Book (EPA, 2026). Proposed activities under the Trails Plan include creating additional mowed paths for pedestrians, developing new multi-use trails, and other actions that require the use of heavy machinery and equipment that would emit air pollutants through exhaust and produce particulate

matter such as dust. These impacts would be temporary and would cease once activities were completed. This would temporarily reduce air quality in the immediate work area but would not impact air quality in the region. After the construction phase, operational air quality impacts from public use on the trail network would not measurably impact air quality standards. The proposed action would not introduce new permanent or stationary sources that would generate measurable air pollutants. This project is not expected to alter any trends in air quality and is not expected to contribute to a noticeable level of air pollution in the parks or vicinity. The NPS does not recommend any further consideration of air quality because impacts to air quality are expected to be *de minimis*. Therefore, the NPS dismissed this topic from further analysis.

Water Resources and Water Quality

Several streams dissect the parks, and larger creeks and smaller drainages locally called "runs" are common throughout both Gettysburg NMP and Eisenhower NHS. The main water resources at Gettysburg NMP include an approximately 3.2-kilometer (km) section of Rock Creek and two tributaries. Eisenhower NHS contains Marsh Creek, a large stream 0.3 miles in length with widths that vary from five to 15 meters wide. There are no designated wild and scenic rivers within either of the parks. Where proposed trails cross streams or other waterways, the NPS would design crossings to span from bank to bank, and would not construct trail structures within the waterway itself.

Construction activities associated with the proposed action would require mitigation, including sediment controls and vegetation stabilization. Therefore, the NPS dismissed this topic from further analysis because impacts to water resources and to water quality would be negligible.

Wildlife

The landscape of Gettysburg NMP and Eisenhower NHS is a mixture of agricultural fields, pastures, grasslands, woodlots, and forests. The interspersion of vegetation types provides habitats for a wide variety of wildlife in the parks. Woodland wildlife includes white-tailed deer, gray squirrels, raccoon, opossum, wild turkey, ruffed grouse, woodpeckers, and warblers. Wetland wildlife includes beaver, mink, muskrat, ducks, geese, and other water birds that live along streams, in ponds, marshes, and swamps. There is also a wide variety of reptiles and amphibians, including the spotted turtle (*Clemmys guttata*) and northern two-lined salamander (*Eurycea bislineata*).

Gettysburg NMP and Eisenhower NHS contain suitable habitats that may provide opportunities for foraging, roosts, and nesting for migrating birds, such as raptors and passerines. The proposed action would be primarily adopted in an area that receives frequent human visitation. Local wildlife is habituated to human use of the landscape and thus typically avoid encounters with humans; as a result, continued public use of trails would not adversely affect wildlife. Further, bicycling and other non-motorized uses would not contribute to the loss of wildlife because visitors are encouraged to stay on trails.

The Migratory Bird Treaty Act of 1918 and the Bald and Golden Eagle Protection Act (16 U.S.C. § 668) protect certain birds from intentional or unintentional harmful conduct. Construction, operation, and maintenance activities under the proposed action can incorporate specific measures to avoid and minimize impacts to migratory birds.

The NPS does not recommend any further consideration of wildlife (with the exception of threatened and endangered species) because proposed trail construction activities would be scheduled to avoid any sensitive nesting periods for migratory birds, breeding mammals, and reptiles, which would avoid adverse impacts to these species. In addition, the areas to be disturbed for development of multi-use trails and mowed paths would be relatively small when compared to the overall available habitat within the parks. The use of motorized equipment during the construction process would introduce noise to the landscape, which may disturb wildlife in the general area; however, construction-related noise would be temporary, and existing sound conditions would resume following construction activities. Since the construction and operation activities would not have a measurable effect on wildlife, the NPS dismissed this topic from detailed analysis.

Freshwater Isopods and Amphipods

In response to a previous project review request submitted to the Pennsylvania Natural Heritage Program, the Pennsylvania Fish and Boat Commission expressed concerns regarding potential effects to isopods and amphipods. Freshwater isopods and amphipods may be present within the project area, and increased sedimentation from the transport of construction-related byproducts into nearby waterways could result in adverse impacts to the species.

During proposed construction of trails and associated facilities, workers would implement strict erosion and sediment controls to minimize the transport of construction-related byproducts into nearby waterways where isopods and amphipods may occur. The NPS would provide Pennsylvania Fish and Boat Commission opportunities to review erosion and sediment control plans to ensure that the proposed action adopts appropriate measures to avoid or minimize impacts. Therefore, the NPS recommends not carrying this issue forward for detailed analysis.

1.5 NPS Bicycle Rule Compliance

The NPS bicycle regulations at 36 CFR § 4.30 (Bicycle Rule) govern the designation and management of bicycle use in units of the National Park System. Before authorizing bicycle use on a specific trail, the NPS must complete a planning process that evaluates:

- the suitability of the trail surface and soil conditions for accommodating bicycle use;
- any maintenance, minor rehabilitation or armoring that is necessary to upgrade the trail to sustainable condition;
- lifecycle maintenance costs;
- safety considerations;
- methods to prevent or minimize user conflicts; and

- methods to protect natural and cultural resources and mitigate impacts.

The Bicycle Rule also requires the NPS to complete appropriate NEPA review addressing bicycle use on the specific trails proposed for designation. When an EA is used for this purpose, the public must be provided a 30-day opportunity to review and comment.

In addition, the park superintendent must prepare, and the regional director must approve, a written determination that bicycle use on the designated trails is consistent with protection of the park area's natural, scenic, and aesthetic values; safety considerations; and management objectives, and would not disturb wildlife or park resources.

The regulatory process differs depending on whether a new trail is located within or outside a developed area. NPS regulations define a developed area as "…roads, parking areas, picnic areas, campgrounds, or other structures, facilities or lands located within development and historic zones depicted on the park area land management and use map" (36 CFR § 1.4[a]). For existing trails and new trails within developed areas, the NPS must publish the written determination in the Federal Register for a 30-day public comment period. The regional director must approve the written determination for all trails.

For a new bicycle trail outside a developed area, the NPS must also promulgate a special regulation designating the trail for bicycle use through a separate notice-and-comment process under the Administrative Procedure Act.

All new trails, whether inside or outside developed areas, would be designed and constructed using appropriate sustainable trail-design principles. These requirements help ensure that bicycle use is authorized only where the NPS determines it is appropriate and would not result in unacceptable impacts.

Gettysburg NMP and Eisenhower NHS allow e-bikes where traditional bicycles are allowed and prohibit e-bikes where traditional bicycles are prohibited. Except where they allow public use of motor vehicles, both parks prohibit using the electric motor to move an e-bike without pedaling.

This EA serves as the planning and NEPA compliance document required by the Bicycle Rule for the bicycle uses evaluated in the Trails Plan. Under the Proposed Action, bicycle use would be authorized only on designated multi-use trails shared by pedestrians and bicyclists. No bicycle-only trails would be developed, and bicycles would not be authorized on existing multi-use pedestrian/equestrian trails. The Proposed Action evaluates bicycle use on both new and selected existing trails; all proposed bicycle trails identified in this plan are within developed areas.

Chapter 3 evaluates trail-surface and soil conditions, safety, potential user conflicts, and measures to protect natural and cultural resources. Section 2.2 addresses lifecycle maintenance considerations. If the NPS reaches a finding of no significant impact for the Proposed Action, the

NPS would complete the additional written determination and Federal Register public-comment process required by the Bicycle Rule.

2 ALTERNATIVES

2.1 No Action Alternative

Under the No Action Alternative, the NPS would continue current trail management at Gettysburg NMP and Eisenhower NHS. No new trails or trail connections would be constructed, and existing trails would receive routine, small-scale maintenance as needed. Current authorized trail uses, visitor experiences, interpretive opportunities, parking, and trail access would remain unchanged. Eisenhower NHS would remain disconnected from the Gettysburg NMP trail network.

2.2 Proposed Action

Under the Proposed Action, the NPS would adopt and implement a Comprehensive Trails Plan for Gettysburg NMP and Eisenhower NHS (Figure 2) over approximately 10 to 15 years. Implementation would be phased as funding, staffing, design, compliance, and operational priorities allow. The plan would construct new multi-use and pedestrian trails, make limited realignments to existing equestrian trails, authorize bicycle use on selected trails, establish or improve interpretive trailheads and visitor amenities, eliminate unauthorized social trails, and modify use of selected park avenues. Together, these actions would improve visitor safety and multimodal access, expand opportunities for interpretation, connect the two parks and regional trail systems, and reduce resource impacts associated with informal visitor use. New trail facilities would be designed in accordance with applicable Architectural Barriers Act accessibility requirements and sustainable trail-design principles.

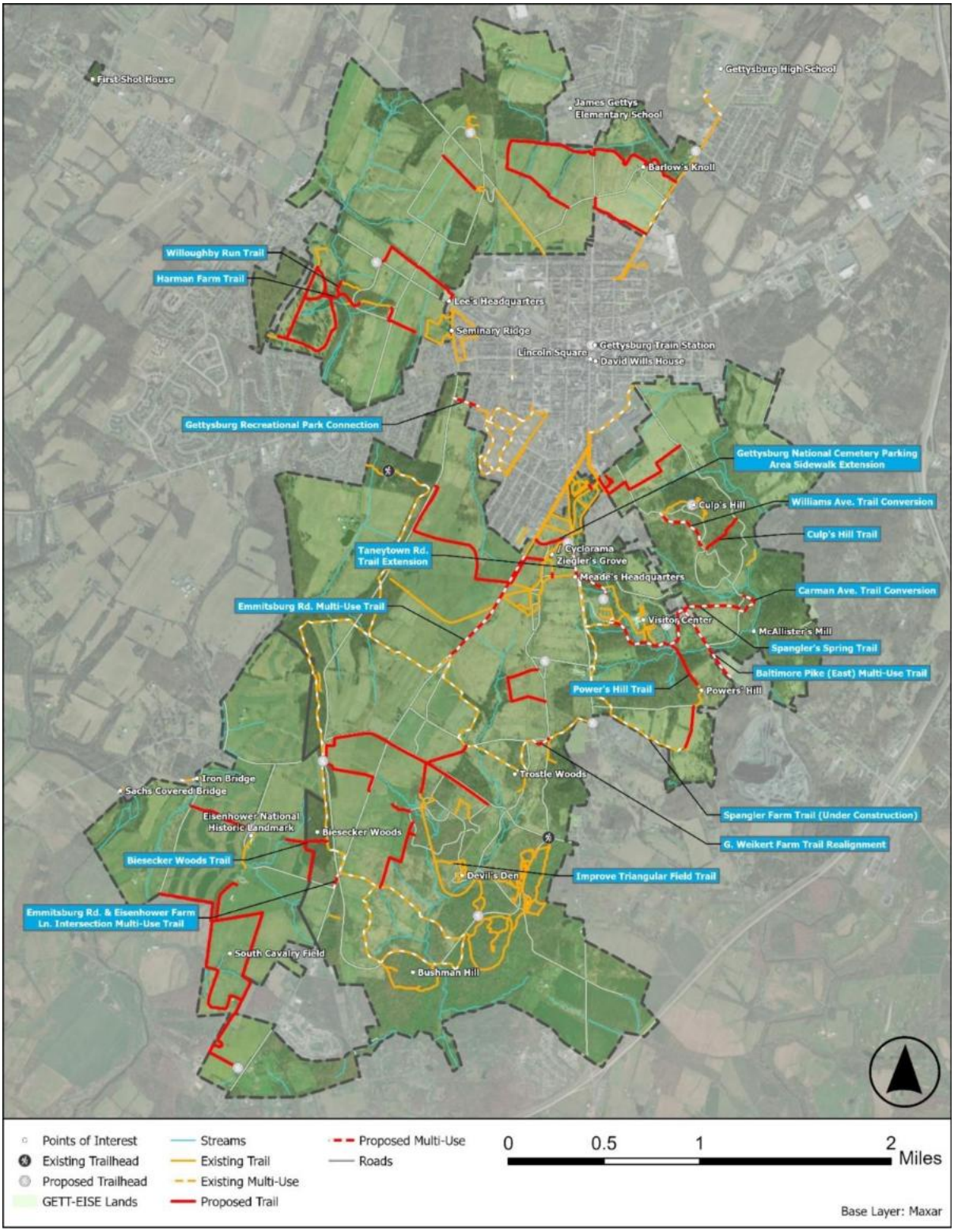


FIGURE 2. PROPOSED TRAILS, EXISTING TRAILS, AND POINTS OF INTEREST WITHIN THE PROJECT AREA

Construction of Multi-Use Trails

The Proposed Action includes approximately 3.0 miles of new multi-use trails for pedestrians and bicyclists. These facilities would create key connections within and between the parks and provide alternatives to traveling in mixed traffic on park and public roads.

Bicycle use on these trails would be authorized in accordance with 36 CFR § 4.30. Multi-use trail surfaces would generally consist of asphalt or compacted gravel. Where necessary, boardwalks, bridges, or culverts could be used to cross wetlands, streams, or drainage features. Trail design and operation would address lifecycle maintenance, visitor safety, user conflicts, resource protection, and connections with commercial services and other transportation systems.

Where feasible, multi-use trails would consider the following design features to reduce user conflicts:

- Have a width of 8 to 10 feet to allow safe passage.
- Contain a painted striped centerline on wider trails to create directional lanes.
- Install directional signs at high-conflict junctions.
- Prioritize sightline clearing at curves and junctions.
- Clearly identify user expectations and permitted uses at trailheads using maps, symbols, and standardized trail etiquette messaging.
- Minimize unnecessary trail intersections and design crossings to occur at locations with good visibility.

The Trails Plan proposes the following multi-use trails:

1. Spangler's Spring Trail – connects Gettysburg NMP Museum and Visitor Center to Culp's Hill by crossing Baltimore Pike at the existing Museum and Visitor Center entrance.

2. Taneytown Road Trail – connects Meade's Headquarters (HQ) to the Gettysburg National Cemetery parking lot. The existing Pedestrian Trail from Meade's HQ to the Gettysburg National Cemetery parking lot would be removed and a section of multi-use trail would be built adjacent to Taneytown Road.

3. Emmitsburg Road Multi-Use Trail – provides connection along Emmitsburg Road to Steinwehr Avenue and Sickles Avenue and provides access to other key locations in the parks while separated from vehicle traffic. This trail would be located adjacent to the west side of the road within the existing road right-of-way.

4. Baltimore Pike (East) Multi-Use Trail – connects the end of the under-construction Spangler Farm Trail to the bicycle and pedestrian routes on Blacksmith Shop Road, along Baltimore Pike to the Culp's Hill area, and back to the Gettysburg NMP Museum and

Visitor Center. This would avoid a state highway with high traffic volumes and high speed limits. This trail would be located adjacent to the east side of the road.

5. Gettysburg Recreational Park Connection – connects SW Confederate Avenue to Red Patch Lane and Gettysburg Borough Recreation Park via a proposed multi-use trail and on-road routes. This connection avoids wetland crossings that resulted in the NPS dismissing this option during an earlier planning effort.
6. Emmitsburg Road and Eisenhower Farm Lane Intersection Multi-Use Trail – connects the existing Biesecker Woods Equestrian/Pedestrian Trail access to SW Confederate Avenue and Eisenhower Farm Lane, avoids conflict with vehicle traffic at the intersection with West Confederate and Emmitsburg Road. This trail at Eisenhower NHS would be located adjacent to the west side of the road.

Construction of Pedestrian Trails

The Trails Plan includes approximately 13.3 miles of new pedestrian facilities. Depending on location, these routes would consist of mowed grass, compacted earth or footpaths, stone dust, asphalt, or concrete sidewalks (Table 1). New facilities would be designed to meet applicable accessibility requirements while remaining compatible with the historic landscape and site-specific resource conditions.

TABLE 1. TYPES OF PEDESTRIAN TRAILS

Trail Type	Description
Pedestrian Sidewalk	Pedestrian only, paved or concrete surface facility paralleling a roadway or parking area.
Pedestrian Trail	Pedestrian only, crushed stone, earthen, mowed surface, or paved surface trail.
Multi-Use: Equestrian/Pedestrian Trail	Pedestrians and equestrians only, crushed stone.
Multi-Use: Bike/Pedestrian Trail	Pedestrians and bikes only, paved surface trail. Or other Accessibility Guidelines for Outdoor Developed Areas-approved trail surface.

TABLE 2. SUMMARY OF TRAILS, SURFACE TYPE, AND LENGTH

Trail Name	Surface Type	Length	Notes
Multi-Use: **Bike/Pedestrian Trails**	Asphalt or compacted gravel	3.0 miles	*Individual values may not sum precisely to the total due to rounding of estimates*
Spangler's Spring Trail		1.39	Includes Carman Ave and Williams Ave trail conversions
Taneytown Road Trail		0.28	Existing pedestrian walkway will be removed, and a wider paved facility will replace it to accommodate bicycles
Emmitsburg Road Multi-Use Trail		0.66	Coordinate with PennDOT and determine feasibility
Baltimore Pike (East) Multi-Use Trail		0.43	Construct on east side of Baltimore Pike to proposed multi-use Spangler's Spring Trail
Gettysburg Recreational Park Connection		0.14	Previously proposed alignment impacted wetlands, adjusted alignment does not
Emmitsburg Road and Eisenhower Farm Lane Intersection Multi-Use Trail *(Eisenhower NHS)*		0.07	Sidepath along SW Confederate Avenue connecting users coming from the existing equestrian and pedestrian trail to Eisenhower Farm Lane, avoiding the intersection with Emmitsburg Road
Pedestrian Trails	Mowed grass (or footpath of compacted earth, stone dust)	13.3 miles	*Individual values may not sum precisely to the total due to rounding of estimates*
Harman Farm Trail	Mowed/footpath	0.22	Creating new formalized trail to maintain
Willoughby Run Trail	Footpath	0.08	Connects an existing trail from Stone Avenue to Willoughby Run, creating a loop by connecting to proposed Harman Farm Trail

Trail Name	Surface Type	Length	Notes
Culp's Hill Trail	Footpath	0.23	Connects Culp's Hill observation tower to East Confederate Avenue, reducing the number of social trails in the area
Triangular Field Trail	Footpath	0.10	Mowed path connecting Sickles Ave to the Trolley Path, running through the "Triangular Field."
East Cemetery Hill Attack Trail	Mowed	0.56	Connects East Confederate Avenue and Wainwright Avenue, providing interpretation
Camp Colt Trail	Mowed	1.20	Connects McMillan Woods to Camp Colt marker on Emmitsburg Road, providing World War I and II history interpretive content
Blocher Trail	Mowed	0.61	Connects proposed McLean Farm Lane Trail to Barlow's Knoll and the sidewalk along Old Harrisburg Road, providing battlefield interpretation
McLean Farm Lane	Mowed	1.02	Provides battlefield access and creates a pedestrian loop
Iverson's Attack Trail	Mowed	0.24	Connects monuments on Buford Avenue to Oak Ridge Observation Tower and monuments on Doubleday Avenue
Railroad Cut Trail	Mowed	0.27	Connects the proposed West End Guide Station trailhead to Lee's Headquarters (American Battlefield Trust property), redirects pedestrians off Chambersburg Road, and provides access to markers/monuments and interpretive value

Trail Name	Surface Type	Length	Notes
Alms House Trail	Mowed	0.35	Connects Adams County Historical Society to Howard Avenue and North Gettysburg Multi-use Trail
First Minnesota Defense Trail	Mowed	0.47	Loops from the State of Pennsylvania Memorial to the Willard Monument, and provides access to markers, monuments, and interpretive value
Bigelow Battery Trail	Mowed	0.22	Connects from Wheatfield Road to United States Avenue, providing access to the proposed Warfield Trail Loop, Trostle Farm, and markers and monuments
Split Rock – Rose Field Access	Mowed	0.48	Connects Slyder Lane to Detrobriand Avenue alignment and provides pedestrians with access to the site of the 1863 photography
Trolley Line to Confederate Attack Trail	Mowed	0.08	Connects the existing Trolley Line Trail to the Confederate Attack Trail, redirecting pedestrians off Warren Ave
Warfield Trail Loop	Mowed	1.12	Connects Warfield Access Trail to Rose Farm, and Detrobriand Avenue to Sickles Ave
Wheatfield Road Bypass	Mowed	0.39	Redirects pedestrians off Wheatfield Road between Ayers Road, across the intersection with Sickles Ave, connecting to the Warfield Trail Loop
Baltimore Street Trail	Mowed	0.20	Connects Gettysburg Borough sidewalk, providing access to monuments and the East Cemetery Hill Attack Trail

Trail Name	Surface Type	Length	Notes
Springs Hotel Loop	Mowed	1.31	Removes existing asphalt golf cart paths and creates a loop around the property
South Cavalry Field Trail Loop	Mowed	2.03	Connects a proposed trailhead on Emmitsburg Road to the edge of the field, into Bishop Farm running south to north along the edge of the field, connecting to the Eisenhower NHS show barns.
Powers Hill Trail	Mowed/footpath	0.48	Development of the mowed path segment would need to be coordinated with the landowner (Gettysburg Foundation)
Gettysburg National Cemetery Parking Area Sidewalk Extension	Paved	0.17	Sidewalk connecting the National Cemetery Parking Area with the Steinwehr Avenue sidewalk and crosswalk to businesses
Biesecker Woods Trail *(Eisenhower NHS)*	Mowed/footpath	0.33	Connects existing equestrian/pedestrian trail along SW Confederate Avenue to proposed mowed path that accesses the Skeet Range
Eastern Field Loop *(Eisenhower NHS)*	Mowed	0.13	Connects Eisenhower Farm Lane to the Skeet Range via a trail that skirts the agricultural field and follows the boundary with Biesecker Woods
Secret Service Road Trail *(Eisenhower NHS)*	Mowed	0.34	Connects Eisenhower Drive to Red Rock Road along an existing road trace
Show Barn Trail *(Eisenhower NHS)*	Mowed	0.67	Follows the fence and tree lines to connect with the South Cavalry Field Trail near the Show Barn
Authorize Bicycle Access on Select Existing Pedestrian Trails			

Trail Name	Surface Type	Length	Notes
Museum and Visitor Center (M&VC) West trailhead to Taneytown Road Trail	Paved	0.28	Provides a multi-use access loop from the Museum and Visitor Center
Taneytown Road Trail	Paved	0.46	Provides multi-use access from the Museum and Visitor Center on the east side of Taneytown Road to Meade's HQ
Equestrian Trail			
G. Weikert Farm Trail	Compact earth / crushed stone	0.09	Minor realignment of an existing multi-use equestrian and pedestrian trail, connects to the existing trail at Sedgwick Avenue and along United States Avenue

Where feasible, pedestrian trails would consider the following design features to reduce conflicts with vehicles:

- Provide a physical barrier or setback between the trail and the road (e.g., planted buffer strip, curb, grade change, low wall, etc.)
- Manage sightlines at intersections and crossings.
- Mark the road pavement with a different color or texture to warn drivers of pedestrian paths.
- Design crossings to be as short and perpendicular to the roadway as practical to reduce pedestrian exposure.
- Incorporate traffic-calming measures, such as reduced speed zones, curb extensions, raised crosswalks, speed tables, or lane narrowing where appropriate and compatible with the historic landscape.
- Install wayfinding signage directing visitors to designated crossing locations and discouraging informal crossings.
- Install advance pedestrian crossing warning signs and trail crossing signage for approaching motorists.

The Trails Plan proposes the following pedestrian trails:

1. Harman Farm Trail – eastern segment to connect the existing Herbst Woods Trail to Meredith Avenue, across South Reynolds Avenue, and to existing pedestrian walkways at Seminary Ridge. The western segment would connect the existing Herbst Woods Trail

across Stone Avenue, to the proposed Willoughby Run Trail, and to the proposed Springs Hotel Loop. This also includes construction of a pedestrian trail. This was previously proposed as a multi-use trail, but under this Trails Plan the improved footpath and mowed trail segments would be for pedestrian use only.

2. Willoughby Run Trail – connects an existing trail from Stone Avenue to Willoughby Run, creating a loop by connecting to proposed Harman Farm Trail. This also includes construction of a pedestrian trail.
3. Culp's Hill Trail – connects Culp's Hill observation tower to East Confederate Avenue, reducing the amount of social trails in the area. This also includes construction of a pedestrian trail.
4. Triangular Field Trail – improves the existing footpath and connects the Trolley Line Trail to Devil's Den. This also includes construction of a pedestrian trail.
5. East Cemetery Hill Attack Trail – connects East Confederate Avenue and Wainwright Avenue, providing interpretation.
6. Camp Colt Trail – connects McMillan Woods to Camp Colt marker on Emmitsburg Road, crossing Emmitsburg Road to access Bryan Barn, and provides World War I and II history interpretive content.
7. Blocher Trail – connects proposed McLean Farm Lane Trail (at Biglerville Road) to Barlow's Knoll and the sidewalk along Old Harrisburg Road (Business Route 15) and provides battlefield interpretation.
8. McLean Farm Lane Trail – Connects Howard Avenue with the McLean House following the alignment of the original farm lane. It provides access to the battlefield and creates a pedestrian loop including the existing Mummasburg Road Multi-use Trail, McLean Farm driveway, proposed Blocher Trail to Barlow's Knoll, existing sidewalk and North Gettysburg Multi-use Trail along Business Route 15, proposed Alms House Trail behind Adams County Historical Society, to Howard Avenue where pedestrians can return to Mummasburg Road Multi-use Trail or McLean Farm.
9. Iverson's Attack Trail – connects monuments on Buford Avenue to Oak Ridge Observation Tower and monuments on Doubleday Avenue.
10. Railroad Cut Trail – connects the proposed West End Guide Station trailhead via a proposed crosswalk on Chambersburg Road (US-30), and across North Reynolds Avenue and onto Lee's Headquarters (American Battlefield Trust property). Also, redirects pedestrians off Chambersburg Road (US-30) and provides access to markers/monuments and interpretive value.
11. Alms House Trail – connects Adams County Historical Society to Howard Avenue and the existing North Gettysburg Multi-use Trail along Business Route 15.
12. First Minnesota Defense Trail – loops from the State of Pennsylvania Memorial on Hancock Avenue to the Willard Monument, and returns along the existing fence line. Also provides access to markers, monuments, and interpretive value.

13. Bigelow Battery Trail – connects from Wheatfield Road to United States Avenue, providing access to the proposed Warfield Trail Loop, Trostle Farm, and markers and monuments.
14. Split Rock - Rose Field Access Trail – connects Slyder Lane to Detrobriand Avenue alignment and provides pedestrians with access to the site of the 1863 photography.
15. Trolley Line to Confederate Attack Trail – connects the existing Trolley Line Trail to the Confederate Attack Trail, redirecting pedestrians off Warren Ave.
16. Warfield Trail Loop – connects Warfield Access Trail to Rose Farm, and Detrobriand Avenue to Sickles Ave, along the south side of Wheatfield Road to Millerstown Road, to SW Confederate Ave.
17. Wheatfield Road Bypass – redirects pedestrians off Wheatfield Road between Ayers Road, across the intersection with Sickles Ave, connecting to the Warfield Trail Loop.
18. Baltimore Street Trail – connects the existing Gettysburg Borough sidewalk along Baltimore Street, providing access to monuments and the East Cemetery Hill Attack Trail.
19. Springs Hotel Loop – removes existing asphalt golf cart paths and creates a loop around the property according to the Cultural Landscape Report alignment.
20. South Cavalry Field Trail Loop – connects a proposed trailhead on Emmitsburg Road to the edge of the field, into Bishop Farm running south to north along the edge of the field, connecting to the Eisenhower NHS Show Barns.
21. Powers Hill Trail – connects the Spangler Farm Trail (under construction) to Granite School House Road and extending the existing footpath from Powers Hill to the Museum and Visitor Center. Development of the mowed path segment would need to be coordinated with the landowner (Gettysburg Foundation).
22. Gettysburg National Cemetery Parking Area Sidewalk Extension – sidewalk connecting the National Cemetery Parking Area with the Steinwehr Avenue sidewalk and crosswalk to businesses.

The Trails Plan proposes the following crosswalks:

1. Mummasburg Road Multi-use Trail and McLean Farm driveway
2. Hancock Avenue bus loading area
3. Stone Avenue, West End Guide Station, and Railroad Cut Trail
4. SW Confederate Avenue
5. McMillan Woods driveway and Camp Colt Trail
6. At existing Biesecker Woods Equestrian/Pedestrian Trail
7. Intersection with Emmitsburg Road
8. Granite Schoolhouse Lane and Spangler Farm Trail (under construction)

9. Blacksmith Shop Road, Baltimore Pike, and proposed Baltimore Pike (East) Multi-Use Trail
10. Baltimore Street at National Cemetery Drive
11. Taneytown Road Trail crossing. This would involve restriping the crosswalk at a right angle rather than the current diagonal configuration.

Authorization of Bicycle Use on Existing Pedestrian Trails

Under the Trails Plan, the NPS would authorize bicycle use on selected existing pedestrian trails in accordance with 36 CFR § 4.30. Where needed, these routes could be widened, resurfaced, or managed through vegetation clearing to provide adequate sight distance and safely accommodate shared use. Bicyclists would continue to use designated park avenues and roadways where multi-use trails are not available.

The Trails Plan would authorize bicycle use on the following existing pedestrian trails:

1. Museum and Visitor Center West trailhead to Taneytown Road Trail – provides a multi-use access loop from Museum and Visitor Center.
2. Taneytown Road Trail – provides multi-use access from the Museum and Visitor Center on the east side of Taneytown Road to Meade's HQ.

Construction of Eisenhower NHS Trails

The Proposed Action would establish a small network of pedestrian trails at Eisenhower NHS to improve access to the broader farm landscape and connect destinations outside the developed area surrounding the Eisenhower home.

1. Biesecker Woods Trail - connects existing equestrian/pedestrian trail along SW Confederate Avenue to proposed mowed path that accesses the Skeet Range.
2. Eastern Field Loop - connects Eisenhower Farm Lane to the Skeet Range via a trail that skirts the agricultural field and follows the boundary with Biesecker Woods.
3. Secret Service Road Trail - connects Eisenhower Drive to Red Rock Road along an existing road trace.
4. Show Barn Trail - begins at gravel access lane near wire corn crib, follows fence line of western bull pen and Show Barn paddocks to and along the southern boundary to connect Red Rock Road. It will connect with the South Cavalry Field Trail near the Show Barn.

The Trails Plan includes the following proposed multi-use trail at Eisenhower NHS:

- SW Confederate and Emmitsburg Road Intersection Multi-Use Trail – sidepath along SW Confederate Avenue connecting users coming from the existing equestrian and pedestrian trail to Eisenhower Farm Lane, avoiding the intersection with Emmitsburg Road.

Construction of Equestrian Trails

The Trails Plan would limit new equestrian-trail construction because of potential resource and environmental impacts. Instead, the Proposed Action includes a minor realignment of one existing multi-use equestrian/pedestrian trail:

- G. Weikert Farm Trail – realigns the equestrian/pedestrian trail down the farm driveway, past the farmhouse and barn, and connects to the existing trail at Sedgwick Avenue and along United States Avenue.

Construction of Interpretive Trailheads and Other Amenities

The Trails Plan would improve visitor orientation and trail access by establishing interpretive trailheads primarily at locations with existing infrastructure, such as parking areas. Using previously developed areas would minimize new ground disturbance; total new disturbance associated with trailheads is expected to be less than 0.5 acre.

Where needed, the NPS would add or reconfigure parking to support trail access, including parallel spaces or other site-appropriate configurations. Trailheads could also include bicycle racks, wayfinding signs, interpretive waysides, and accessibility information. Improvements would be designed in accordance with applicable accessibility requirements and to minimize effects on the historic landscape.

The Trails Plan would improve or construct interpretive trailheads at the following locations:

- Gettysburg NMP Museum and Visitor Center West
- Gettysburg NMP Museum and Visitor Center East
- National Cemetery parking area
- West End Guide Station
- Big Round Top
- Little Round Top
- Josiah Benner Farmhouse
- South Cavalry Field
- Warfield Ridge Tower
- Eisenhower NHS Primary Visitor Parking Area
- Taneytown Road equestrian access (commercial horse user relocation)

Elimination of Unauthorized Social Trails

Unauthorized visitor-created routes, commonly called social trails, can cause erosion and damage natural and cultural resources. The Trails Plan would close and rehabilitate selected social trails and direct visitors to designated routes.

The Trails Plan would eliminate unauthorized social trails at the following locations:

- Eternal Light Peace Memorial
- Culp's Hill, Powers Hill
- Big Round Top
- Reynolds Woods
- Pickett's Charge
- Along the existing trail within the forested area east of Sedgwick Avenue between Wheatfield Road and the New Jersey Brigade Monument. Directional hiking signs would be removed, and areas would be restored to an appropriate vegetated condition.

To continually enforce social trail elimination, the park would:

- Periodically survey the trail system for social trails, prioritizing areas with high use or that are prone to erosion.
- Remove social trails using appropriate methods such as brush placement, signage, physical closure structures, active restoration, and regulatory enforcement.
- Use educational messaging to explain the impacts of social trails on natural, cultural, and archeological resources.
- Use seasonal closures or temporary barriers to allow vegetation recovery where appropriate.

Changes to Park Avenue Use

The Trails Plan would close selected redundant park avenue segments to motor vehicles and designate them for bicycle and pedestrian use. These changes would reduce confusing traffic patterns, create traffic-separated connections, and make use of existing paved surfaces without requiring new trail construction.

- Carman Avenue – redundant, narrow road running parallel to Colgrove Avenue and is currently difficult for vehicles to complete turning movements. Closure to vehicles provides a traffic-separated bicycle and pedestrian lane that would be part of a larger loop to and from the Museum and Visitor Center and Culp's Hill. Existing one-way vehicle traffic would simultaneously be reversed on Colgrove Avenue. The proposed closure would need to be field tested with a tour bus to ensure it remains a feasible option.

- Williams Avenue – redundant, narrow road running parallel to Slocum Avenue and mostly used by park staff for maintenance access. Closure to vehicles provides a traffic-separated bicycle and pedestrian lane that would be part of a larger loop to and from the Museum and Visitor Center and Culp's Hill.

Closing these road segments to vehicular traffic would reduce driver confusion about narrow and one-way traffic flow and create new traffic-separated segments that connect to the formal trail network without any construction or disturbance.

Operation and Management

Maintenance

Routine maintenance would preserve trail infrastructure, support visitor safety and accessibility, protect natural and cultural resources, and extend the useful life of the trail system. The NPS would use preventive maintenance and adaptive management to address emerging problems before they become larger safety, resource, or infrastructure concerns.

Routine trail maintenance may include, but is not limited to:

- Vegetation management to maintain trail clearances, preserve sightlines, and reduce encroachment.
- Trail tread maintenance, including grading, resurfacing, and repair of localized erosion or settlement.
- Cleaning, repair, and replacement of drainage features such as culverts, water bars, ditches, and drainage swales.
- Inspection, maintenance, and repair of bridges, boardwalks, retaining walls, steps, railings, and other trail structures.
- Repair or replacement of trail signs, pavement markings, wayfinding features, and interpretive elements.
- Removal of fallen trees, hazardous limbs, and other obstructions affecting trail access or visitor safety.
- Restoration of disturbed trail shoulders and adjacent vegetation where resource impacts have occurred.
- Closure and rehabilitation of unauthorized social trails, as appropriate.
- Inspection and maintenance of trailheads, parking areas, overlooks, benches, bicycle racks, and other visitor amenities.
- Monitoring trail conditions to identify maintenance needs, visitor safety concerns, and resource impacts.

The frequency and extent of maintenance will vary depending on site-specific conditions and available resources. Factors influencing maintenance needs include:

- Trail surface type (natural surface, aggregate, asphalt, boardwalk, etc.).
- Visitor use levels and seasonal fluctuations.
- Weather events and climatic conditions.
- Topography and drainage characteristics.
- Soil type and erosion potential.
- Vegetation growth and invasive species.
- Proximity to sensitive natural, cultural, or archeological resources.

- Accessibility requirements.
- Results of routine inspections, condition assessments, and visitor feedback.

The NPS would establish maintenance priorities through condition assessments, safety inspections, operational needs, resource considerations, and available funding. Maintenance practices would be adjusted as visitor use, environmental conditions, and resource-management priorities change. Work would be consistent with applicable preservation standards and would seek to protect the historic character and natural, cultural, and scenic resources of both parks.

Wayfinding

The Proposed Action would establish a consistent wayfinding system for Gettysburg NMP and Eisenhower NHS. Designated trails would be formally named or updated as needed so that the same trail names and information are used on park maps, digital applications, interpretive materials, emergency-response plans, and directional signs.

Wayfinding would be designed to help visitors navigate confidently while minimizing visual effects on the historic landscape. Signs, maps, and other visitor information would use consistent naming, symbols, typography, and graphic standards across both parks.

Trailheads and major trail access points may include:

- Trail name and destination(s).
- Trail length (one-way and/or round trip).
- Estimated hiking or bicycling time.
- Difficulty rating (e.g., Easy, Moderate, Difficult).
- Surface type (natural surface, crushed stone, asphalt, boardwalk).
- Accessibility information, including compliance with applicable accessibility standards.
- Permitted trail uses (pedestrian, bicycle, equestrian, etc.).
- Connections to adjacent trails, roads, parking areas, shuttle stops, and visitor facilities.
- Locations of accessible parking, restrooms, water, and emergency access points, where applicable.
- Trail etiquette and right-of-way guidance for shared-use trails.
- Safety information, including reminders regarding weather, wildlife, traffic crossings, and emergency preparedness.
- Resource protection messages encouraging visitors to remain on designated trails and avoid creating social trails.
- Maps showing visitor orientation, current location ("You Are Here"), key destinations, and estimated distances.
- QR codes or other digital links providing access to mobile maps, accessibility information, interpretive content, and current trail conditions, where appropriate.

Directional signs along the trail system may include:

- Directional arrows and destination names.
- Distance remaining to major destinations.
- Trail junction identification.
- Confirmation markers to reassure visitors they remain on the designated route.
- Emergency location identifiers to assist first responders.
- Mile markers where appropriate for maintenance and emergency response purposes.

The park's interpretive program would coordinate with wayfinding improvements so that visitor orientation also supports understanding of the battlefield and encourages use of designated trail networks. Sign placement, materials, colors, and design would be selected to minimize visual intrusion and remain compatible with the character of the parks' cultural landscapes.

The park would periodically evaluate and update wayfinding infrastructure to reflect changes in trail alignments, accessibility improvements, visitor use patterns, and operational needs.

Wayfinding Design Principles

Where feasible, the park's wayfinding system should:

- Be simple, intuitive, and consistent throughout the park.
- Provide sufficient information for visitors to confidently navigate without excessive signage.
- Balance visitor orientation with preservation of the historic battlefield landscape.
- Minimize sign clutter through strategic placement and consolidation of information.
- Support visitors of varying ages, abilities, languages, and levels of familiarity with the park.
- Integrate traditional wayfinding with digital mapping and navigation tools where appropriate.
- Support park operations, emergency response, maintenance activities, and special event management.

Together, these measures would create an integrated visitor-orientation system rather than a collection of individual trail signs. The system would support recreation, interpretation, accessibility, emergency response, and resource protection while remaining sensitive to the nationally significant cultural landscapes.

Implementation Process and Costs

The NPS would implement the Proposed Action in phases as funding, staffing, design, compliance, and operational priorities allow. Phased implementation would allow individual

projects to proceed as resources become available and would reduce disruption to visitors by coordinating construction, temporary closures, and other work.

The NPS prepared **Class C planning-level cost estimates (±25–40%)** based on anticipated 2026 construction costs for the Mid-Atlantic region. These estimates consider anticipated trail surface types, accessibility requirements, drainage improvements, visitor amenities, historic landscape protection measures, and contingency.

Because approximately **80 percent of the proposed trail network consists of existing mowed pathways**, implementation costs are substantially lower than would be expected for a system requiring extensive new trail construction. Most of these routes would require only minor grading, drainage improvements, wayfinding signage, resource protection measures, and continued mowing rather than construction of new hardened trail surfaces.

The estimated capital cost to implement the Proposed Action is approximately **$5.8 million** (2026 dollars), including contingency. This estimate includes:

- **Approximately $3.0 million** for construction and improvement of trail segments, assuming a combination of mowed pathways, natural surface trails, aggregate trails, and asphalt multi-use trails.
- **Approximately $250,000** for closure and rehabilitation of unnecessary or redundant trail segments, assuming an average cost of **$15 per linear foot**.
- **Approximately $2.0 million** for construction and enhancement of trailheads, accessible parking improvements, interpretive kiosks, directional signage, bicycle parking, benches, overlooks, and other visitor amenities.
- **Approximately $550,000** for restoration and elimination of unauthorized social trails, including revegetation, erosion control, fencing, monitoring, and resource protection.

Annual maintenance of the proposed trail system is estimated at approximately **$140,000 per year**, including mowing, vegetation management, drainage maintenance, trail inspections, sign replacement, periodic surface repairs, and maintenance of visitor amenities.

Although annual maintenance would continue to require dedicated funding, it is anticipated to be **approximately 30 percent lower than under the No Action Alternative** because the proposed trail network would eliminate redundant trail segments, improve drainage, formalize existing mowed routes, reduce erosion, and focus maintenance efforts on a more sustainable and efficiently managed trail system. NPS staff, volunteer organizations, youth conservation crews, and partner organizations, supplemented by contracted services as necessary, would continue to perform routine maintenance.

These Class C estimates are intended to support programmatic planning and environmental analysis; they are not project budgets or funding requests. Costs would be refined during project-

specific planning, design, engineering, and compliance and would vary with final alignments, accessibility requirements, site conditions, and market conditions. Implementation would remain subject to available appropriations, philanthropic support, grants, and staff capacity and would occur incrementally over multiple years.

Mitigation Measures

The NPS would apply the following mitigation measures, as appropriate, during design, construction, operation, and maintenance to avoid or minimize environmental impacts associated with the Proposed Action.

General

- In areas where additional infrastructure improvements are necessary, existing trailheads and previously disturbed areas would be used where practicable to avoid or minimize new impacts to resources.
- Resource management staff would provide all contractor staff and volunteer trail crews with information that would appraise them of and sensitize them to relevant natural resource issues and the importance of minimizing impacts.
- Construction tape or some similar item would identify and demarcate construction zones, staging areas, and work zones.
- The crew would remove all tools, equipment, surplus materials, and rubbish from the project area upon completion.
- Signs or other means would identify and protect sensitive resources on or adjacent to trails and destinations.
- The park would inform visitors of the importance of protecting the park's resources.

Visitor Experience and Safety

- The construction schedule would minimize construction-related impacts on visitors. Areas not under construction would remain accessible to visitors as much as possible.
- The NPS would implement measures to reduce adverse effects of construction on visitors. These may include, but are not limited to, noise abatement, visual screening, and directional signs that aid visitors in avoiding construction activities.
- Trail crews would coordinate and supervise any trail construction or maintenance.
- To the extent possible, staging and stockpiling areas would be away from visitor use areas.
- Implement a public information program to warn of temporary closures, delays, and road hazards during construction. This program would help convey appropriate messages to the public and aid in mitigating potential impacts on visitors' expectations and experiences.

Natural Resources

- Consult with an NPS natural resource specialist before beginning construction to minimize impacts on vegetation and wildlife.
- Prepare a vegetation maintenance plan that outlines vegetation maintenance activities and schedules.
- Reclaim disturbed ground using planting / seeding with native vegetation or, in small treatment areas, allowing native vegetation to reclaim the area naturally.
- Implement weed control to minimize introducing noxious weeds.
- Avoid clearing large trees (>5 inches in diameter at breast height) to the extent feasible.
- Any tree removal during trail construction would only occur between October 1 and March 31, during the period that bats would not be using trees for roosting and foraging.
- For work conducting during nesting season, perform a visual inspection of vegetation to identify any migratory bird nests. Avoid disturbing any nests. Report any incidental take of migratory birds to the appropriate U.S. Fish and Wildlife Service Office.
- To protect nesting raptors, including bald eagles, hawks, owls, falcons, and other birds of prey, pre-construction surveys would be conducted where suitable nesting habitat occurs within or adjacent to project areas. If an active raptor nest is identified, the National Park Service would establish species-appropriate seasonal buffers and avoid construction activities that could disturb nesting until young have fledged or the nest is no longer active, consistent with U.S. Fish and Wildlife Service guidance and applicable state wildlife agency recommendations.
- Avoid cutting and removing snags that may serve as important wildlife habitat structures.
- Where plantings or seeding are required, obtain and use native plant material in accordance with NPS policies and guidance. Implement management techniques to foster rapid development of target native plant communities and to eliminate invasion by exotic species.
- A qualified professional would perform site-specific rare plant surveys to identify and delineate confirmed occurrences along proposed trail alignments. If the surveyor identifies occurrences of rare plants, the NPS would relocate trail alignments to avoid disturbance.
- Consult with an NPS biologist if replacing or modifying any culverts on perennial or intermittent streams so that the new design would enable wildlife movement.

Soil and Water

- Implement professional trail design standards to minimize erosion from new or modified trails.
- Avoid new trail construction in wetlands, to the extent possible.
- Properly maintain structure or fill so as to avoid adverse impacts on aquatic environments.

- Maintain appropriate erosion and siltation controls during new trail construction, and permanently stabilize all exposed soil or fill material at the earliest practicable date.
- Avoid heavy equipment use in wetlands and floodplains. Place heavy equipment used in wetlands on mats, or take other measures to minimize soil and plant root disturbance and to preserve elevations. Take care to avoid any rutting cause by vehicles or equipment.
- Whenever possible, place excavated material on an upland site. Control runoff from stockpiled material with silt fencing, filter cloth, coir wattles, or other appropriate means to prevent reentry into the waterway or wetland.

Cultural Resources

- Consult with an NPS cultural resource specialist before beginning construction to minimize impacts.
- All activities comply with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, the Secretary of the Interior's Standards for the Treatment of Historic Properties (including the Guidelines for the Treatment of Cultural Landscapes), and NPS Director's Order 28: Cultural Resource Management.
- Before construction begins, conduct an archeological survey to identify currently unknown and significant archeological resources. If the activities cannot avoid or minimize effects on resources, consult with the SHPO and the Advisory Council on Historic Preservation, as necessary.
- Should construction unearth previously undiscovered cultural resources, work would cease, and the park would consult with the SHPO and the Advisory Council on Historic Preservation, as necessary. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, follow provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001).

2.3 Alternatives Considered but Dismissed

Construction of Pedestrian Trails at Gettysburg NMP

The NPS considered but dismissed the following pedestrian trail options due to the listed reasons:

- Confederate Avenue to Ridge Road Trail – proposed alignment would provide access to the 1st and 2nd U.S. Cavalry monuments east of Ridge Road and the 5th U.S. Cavalry monument west of Ridge Road; however, gaps in federal landownership prevent the proposed alignment through Gettysburg NMP.
- East Confederate Avenue to Benner's Hill – proposed alignment would provide access to Rock Creek and Benner's Hill; however, this proposal has private landownership issues and would require crossing Rock Creek.
- Trail Connection to the Culp Farm – proposed alignment south of East Middle Street in Gettysburg Borough; however, this proposal has private landownership issues.
- Henry Spangler Orchard to Emmitsburg Road – proposed alignment would connect these locations; however, a different proposed mowed path adequately provides this connection.
- to Trolley Line Trail Extension to Wheatfield Road. – proposed alignment would follow the original alignment of the old Trolley Line across the western face of Little Round Top to connect these locations; however, a combination of mowed paths can provide a similar and preferred park connection.
- Spangler Meadow and Rock Creek Crossing – proposed alignment at this location; however, a bridge over Rock Creek would be needed and there are property ownership issues.
- South Cavalry Field Loop to Emmitsburg Road Crosswalk at Graham's Battery – proposed crosswalk to connect these locations; however, a crosswalk is not needed to reach points of interest on the east side of Emmitsburg Road, and a crossing would be unsafe without additional infrastructure in this location.
- Baltimore Street sidewalk – a proposed pedestrian sidewalk at this location has existing constraints, including conflicts with monuments.

Construction of Multi-Use Trails

The NPS considered but dismissed the following multi-use trail options due to the listed reasons:

- Meade's Headquarters to Hancock Avenue – proposed bicycle use on the existing Pedestrian Trail; however, the trail is a steep grade eastward intersecting with Taneytown

Road. The trail would require widening and introduction of additional hardscape in a major battle area.

- Pleasonton Avenue Trail – proposed alignment would connect Taneytown Road to Hancock Avenue along Pleasonton Avenue; however, the configuration of the existing landscape makes construction challenging and would result in impacts on resources.

Construction of Eisenhower NHS Trails

The NPS considered but dismissed the following trails at Eisenhower NHS for the reasons listed below:

- Farm 2 to Clement Reading Farm Trail – requires crossing wetlands and Marsh Creek.
- Clement Reading Farm to Eisenhower Bridge Trail – requires crossing wetlands and Marsh Creek, and Clement Reading Farm is used for housing and other administrative functions and therefore not accessible by visitors.

Construction of Equestrian Trails

The NPS considered but dismissed the following multi-use Equestrian/pedestrian trail options:

- Slyder Farm Lane to Trostle Farm Loop
- Slyder Farm to Big Round Top Trail (re-engineering existing trail)

While these newly proposed and improved multi-use equestrian/pedestrian trails would provide additional equestrian opportunities, the NPS has resource concerns at these locations that include water crossings and wetlands, archeological significance, resource degradation, ability to maintain the facilities due to grades, and other existing conditions.

Construction of Interpretive Trailheads

The NPS considered but dismissed the following interpretive trail option:

- Lutheran Theological Seminary – previously proposed in 2018 planning efforts; however, this area of the trail network would be covered by a proposed trailhead at West End Guide Station.

Changes to Park Avenue Use

The NPS considered changing traffic patterns and striping on several park avenues, including: Granite School House Lane, Howard Avenue, Pleasonton Avenue, Hunt Avenue, Wheatfield Road, Slocum Avenue, Eisenhower Farm Lane, and Robinson Avenue. The NPS dismissed these options because they can create driver confusion, limit emergency response and local driver access, and impact tour bus operations.

The NPS considered but dismissed closing the following park avenues to vehicular traffic:

- Wainwright Avenue – closure would restrict vehicular access to monuments.
- Colgrove Avenue – alternatively closing the parallel/redundant Carman Avenue minimizes traffic disruption and simplifies vehicular turning movements.

3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes current environmental conditions in the project area and the environmental consequences of implementing each alternative. The affected environment serves as the baseline for predicting changes to the human environment that could occur if any of the alternatives under consideration, including the No Action Alternative, are implemented.

The methods used to assess impacts vary depending on the resource but are generally based on a review of pertinent literature and park studies, information provided by on-site experts and other agencies, professional judgment, and park staff knowledge and insight.

The discussion of resources in this section is organized by impact topics. These impact topics are:

- Visitor use and experience;
- Cultural landscapes, historic structures, and archeological resources;
- Wetlands;
- Vegetation and habitat; and
- Threatened and endangered species.

The Trails Plan is a programmatic plan. Each individual trail project would require its own compliance review, and NEPA would be required as the park implements projects.

3.1 Visitor Use and Experience

3.1.1 Affected Environment

Popular visitor activities at both parks include touring the Museum and Visitor Center, viewing the Cyclorama painting, attending a living history program or ranger talk, and viewing historical structures and locations around the parks. Notably, many of the historical and interpretive features of each park are most easily accessed by vehicle. The existing lack of multi-modal connections and formal trail options often makes it difficult for visitors to easily access and experience the parks unless they use a vehicle. Some significant sites do not have dedicated trails or pathways that provide access, while other sites do not have interpretive waysides. Park avenues and parking areas, particularly at Little Round Top, become congested during peak visitation periods.

Traditional road-based visitation has generally decreased over time at Gettysburg NMP and increased over time at Eisenhower NHS (refer to Table 3). Both parks experienced decreased visitation levels from 2019 to 2020 due to the COVID-19 pandemic. National and state health guidelines resulted in closures and restrictions on group gatherings, which impacted park

visitation. Visitation levels at both parks began to rebound in 2021 after restrictions began to lift and programming began to resume.

TABLE 3. ANNUAL PARK RECREATION VISITS AT GETTYSBURG NMP AND EISENHOWER NHS - 2014 TO 2024

Year	Number of Visitors Gettysburg NMP	Number of Visitors Eisenhower NHS
2014	1,020,702	58,240
2015	1,080,185	54,377
2016	1,091,320	55,550
2017	1,038,649	50,597
2018	949,989	42,036
2019	925,117	47,277
2020	536,553	7,926
2021	687,631	16,915
2022	764,576	22,250
2023	742,173	98,837
2024	741,574	123,466

At Eisenhower NHS, all statistics prior to 2021 were based exclusively on shuttle ticket sales. In 2020, the park suspended the shuttle and closed the Eisenhower Home due to the COVID-19 pandemic. Private-vehicle access continued during this time. Also in 2020, the park expanded its employee parking area and installed a temporary sign at the intersection of Emmitsburg Road and Eisenhower Farm Lane to allow visitors to find the site. In 2022, the shuttle resumed operation, but visitors also continued to drive themselves to the park. Visitation remained focused on the Eisenhower Home tours, but statistics were inconsistently recorded and did not account for administrative traffic. In June 2023, the park installed traffic counters at all entrances and park staff continue to make other efforts to more accurately track visitation.

Visitor use and experience are dynamic given the vulnerabilities of natural and cultural resources, and the need to be responsive to changing conditions.

3.1.2 No Action Alternative

Under the No Action Alternative, existing limitations on non-motorized access and connectivity would continue. Visitors would remain dependent primarily on vehicles to reach many park destinations, and the NPS would not create new multimodal connections or improve pedestrian access between Gettysburg NMP and Eisenhower NHS.

Under the No Action Alternative, visitors would continue to lack access to points of interest and connectivity within Gettysburg NMP and Eisenhower NHS. Visitors would not be able to easily access areas within the parks unless they were using a vehicle because the NPS would not make improvements for multi-modal options. Additionally, visitors would continue to lack safe pedestrian access between Eisenhower NHS and Gettysburg NMP.

3.1.3 Proposed Action

The Proposed Action would improve connectivity within Gettysburg NMP and Eisenhower NHS and provide connections to regional trail systems. Formal trails, designated trailheads, and selected parking improvements would expand opportunities to experience park resources on foot or by bicycle, improve visitor safety, and reduce reliance on unauthorized social trails. At Eisenhower NHS, a more complete trail network would provide additional opportunities to experience the site when the Eisenhower home is closed or outside the primary visitor season.

Construction could temporarily affect visitor access and experience through localized closures, noise, equipment, or detours. The NPS would use the mitigation measures identified in Section 2.2 to reduce these effects and maintain access to unaffected areas where practicable. Table 4 summarizes existing and proposed trail mileage.

TABLE 4. EXISTING TRAIL LENGTHS, PROPOSED TRAIL LENGTHS, AND TOTAL TRAIL LENGTHS (IN MILES), BY TRAIL TYPE AT GETTYSBURG NMP AND EISENHOWER NHS

Trail Types	Existing (mi.)	Proposed (mi.)	Total (mi.)
Multi-use: Bike/Pedestrian Trails	3.8	3.0	6.8
Pedestrian Trails*	27.6	13.3**	40.9
Recommended Visitor On-Road Pedestrian Routes	6.3	10.9	17.2
Recommended Visitor On-Road Bike Routes	56.3	21.7	78.0

** Pedestrian Trails were categorized into additional classifications in certain maps for planning and inventory purposes*

*** Includes 0.1 miles of rerouted existing Multi-Use: Equestrian/Pedestrian Trail, and .17 miles of Pedestrian Sidewalk*

The Proposed Action would increase the amount and variety of designated pedestrian and bicycle facilities. Although additional trail mileage could increase interactions among user groups, the plan incorporates defined trail types, clearer user designations, improved alignments and sight distance, separation from vehicle traffic where feasible, and consistent operational measures intended to reduce conflict and improve safety compared with the No Action Alternative.

The improved trail network may increase commingling of multiple user groups because the total trail mileage would increase. The additional commingling may in turn raise safety concerns due to user conflicts. However, adopting the Trails Plan would overall be safer compared to the No Action Alternative because it incorporates more options for visitors to safely experience the parks on foot or via bicycle.

The Proposed Action provides a safer overall experience than the No Action Alternative by applying consistent design and operational measures across the trail system. Under the No Action Alternative, existing safety issues and user conflicts would persist due to outdated or missing infrastructure. In contrast, the Proposed Action introduces clearly defined trail types, improved alignment and visibility, separation strategies, and predictable user designations that collectively reduce conflict potential. These measures provide safer options for all user groups, even as total trail mileage increases, because expanded mileage is paired with purpose-built facilities and management practices that distribute use more effectively and minimize interaction points between user groups

3.2 Cultural Landscapes, Historic Structures, and Archeological Resources

3.2.1 Affected Environment

Gettysburg NMP, Gettysburg National Cemetery, and Eisenhower NHS are individually listed on and are contributing elements to historic districts listed on the National Register of Historic Places. Features and structures of the cultural landscape, including buildings, outbuildings, monuments, roads, stone walls, ornamental vegetation, and other features, are listed as contributing resources to these historic districts and are the foundations of the parks and the visitor experience. Overuse and improper use of existing trails, as well as social trail development, have degraded the landscape. Unmanaged social trails fragment the cultural landscape, causing physical wear to cultural resources and diminishing the integrity of the landscape’s historic setting.

The geologic units located in Gettysburg NMP and Eisenhower NHS contain microfossils, invertebrates, plants, fossil pollen, and various invertebrate and vertebrate trace fossils.

Gettysburg NMP and Eisenhower NHS contain nationally significant cultural resources that collectively preserve the landscape, structures, archeological resources, and commemorative features associated with the Battle of Gettysburg, the Eisenhower Farm, and subsequent memorialization of the battlefield. The parks have completed numerous Cultural Landscape Reports, Historic Structure Reports, Cultural Landscape Inventories, archeological investigations, and other cultural resource studies that guide stewardship and management decisions.

These studies consistently emphasize the importance of preserving the historic character of the battlefield landscape, including historic circulation patterns, agricultural fields, woodlots, stone walls, fences, monuments, earthworks, buildings, viewsheds, and other defining landscape characteristics. They also identify areas of high archeological sensitivity where intact battlefield deposits, historic farmsteads, roads, encampments, and other cultural resources may remain below ground.

Many existing trails and proposed trail improvements occur within or adjacent to nationally significant cultural landscapes and archeological resources. Consequently, trail planning and implementation must balance visitor access with the protection of historic resources. The studies generally support maintaining or enhancing visitor access where it can be accomplished in a manner that preserves landscape integrity, minimizes ground disturbance, avoids contributing historic features, and protects important views and visitor understanding of the battlefield.

The reports further recognize that visitor circulation is an essential component of interpreting the battlefield. Well-designed trail systems can improve visitor orientation, reduce unauthorized social trails, protect sensitive resources by directing use to appropriate locations, improve accessibility, and enhance opportunities for interpretation while maintaining the historic character of the landscape.

3.2.2 No Action Alternative

Under the No Action Alternative, the NPS would continue routine maintenance of existing trails and roads, but no new trail system would be developed. Existing social trails and other informal visitor routes would continue to affect cultural landscapes, historic structures, and archeological resources where those routes cross or approach sensitive areas.

Under the No Action Alternative, visitors could continue to use social trails, utilize unofficial gathering areas, and access unauthorized areas. Cultural landscapes and resources, including walls, breastworks, and monuments, would continue to be at risk of damage due to visitor contact and soil erosion.

These impacts could increase over time at sites within Eisenhower NHS as annual visitation increases. Gathering areas and parking areas would maintain their current inadequate capacity. Therefore, visitors would continue to leave authorized gathering areas or park outside of

designated park spaces. These actions would increase soil erosion, which could become a hazard to nearby monuments and stone breastworks. Moreover, the continuation of overcrowded gathering areas and paths would prevent some visitors from being able to fully experience or understand historic structures because the contemplative historic setting would continue to be degraded by the visual and audible detraction of crowds and vehicles idling nearby. The use of social trails can damage archeological resources by disturbing soils, exposing buried artifacts, and eroding features that help define and preserve archeological sites. Repeated foot traffic can also permanently alter site integrity, making it harder to interpret, protect, and manage these resources over time.

3.2.3 Proposed Action

The Proposed Action would introduce new trails and related visitor facilities within nationally significant cultural landscapes. Construction could cause localized ground disturbance, vegetation removal, or visual changes; however, trail alignments and design would be developed to avoid or minimize effects on historic features, archeological resources, and character-defining landscape elements. Closing and rehabilitating social trails would also reduce ongoing informal disturbance in sensitive areas.

Because the Trails Plan is programmatic, final design and site-specific treatment decisions would occur as individual projects are developed. Each project would undergo the applicable cultural-resource review, including identification of historic properties, consultation, and determination of effect under Section 106 of the National Historic Preservation Act.

Although new interpretive elements and signage would introduce modern materials into the setting of the historic landscapes, the NPS would design them to be complementary to the historic setting through color, materials, and scale. New interpretive trailheads would increase groupings of visitors around certain monuments, which would slightly change the structures' historic settings. However, these impacts would be minimal because proposed interpretive trailheads generally correspond to areas where groups already gather. The NPS would locate trails and interpretive trailheads away from sensitive stone breastworks, allowing visitors to view them from an appropriate distance while discouraging visitors from approaching or climbing over them. This would result in a beneficial impact on historic structures and cultural landscapes through protection from human disturbance.

Cultural landscapes and historic structures would be protected and avoided, when possible, to mitigate impacts from construction, and the NPS would consult with the Pennsylvania State Historic Preservation Office (SHPO) when appropriate. Rehabilitation efforts would follow the Secretary of the Interior's Standards for the Treatment of Historic Properties to minimize impacts and ensure the long-term preservation of cultural landscapes. The improvements in the Trails Plan would promote resource protection and preservation of the fundamental resources and values identified in park foundation documents.

Construction of trails and associated facilities could modify existing features and add new elements within Gettysburg NMP and Eisenhower NHS that may result in noticeable changes to historic viewsheds and cultural landscapes. Several of the proposed trails traverse areas of high archeological potential. Trail construction, interpretive trailhead establishment, and trail amenity and sign installation have the potential to disturb archeological resources. Portions of several proposed trails and trailheads are within known archeological sites that have been documented and registered in the NPS Cultural Resources Inventory System.

The NPS would follow procedures to avoid, minimize, and mitigate impacts for each trail and/or trailhead project with ground disturbance. Procedures include conducting archeological site investigations and research, shifting trail alignments to avoid disturbance, conducting determinations of eligibility, constructing trails on top of the ground surface or on fill material, conducting onsite construction monitoring by a professional archeologist, or full-scale excavation and data recovery. With these mitigation measures, disturbance to archeological resources would be avoided in most instances. Long-term impacts during trail usage are not anticipated because the NPS would implement sustainable trail designs and conduct ongoing maintenance. While the NPS would provide the Trails Plan to the PA SHPO and others, further Section 106 consultation, including Section 106 assessment of effects to historic properties, would take place once the Trails Plan has been completed and the Finding of No Significant Impact (FONSI) has been signed. Implementing the Proposed Action requires Section 106 consultation, which would take place for individual actions as the Trails Plan is implemented. For each new trail development project, Section 106 review, including identification of historic properties, consultation, and determination of effect, would be completed.

3.3 Wetlands

3.3.1 Affected Environment

Wetlands are home to vegetation types important for the area and provide essential habitat for many plant and animal species. The type of wetland depends on soil type, disturbance, and length and duration of flooding. Many of the wetlands in the two parks are associated with streams and include floodplain forests, forested swamps, shrub swamps, and graminoid marshes. Currently there are approximately 404 acres of wetlands within the parks, with roughly 241 acres classified as perennial riverine wetlands (i.e., creek beds and adjacent wetland habitat associated with perennial waterways in the park). Numerous wetlands in the parks are seepage swamps, which are relatively small forested or shrub-dominated wetlands found on lower slopes where water emerges at the surface in a diffuse flow. Other types of wetlands throughout the parks include freshwater emergent wetlands (28.94 acres), freshwater shrub wetlands (87.14 acres), and freshwater ponds (8.81 acres).

Refer to Figure 3 for a map of park wetlands.

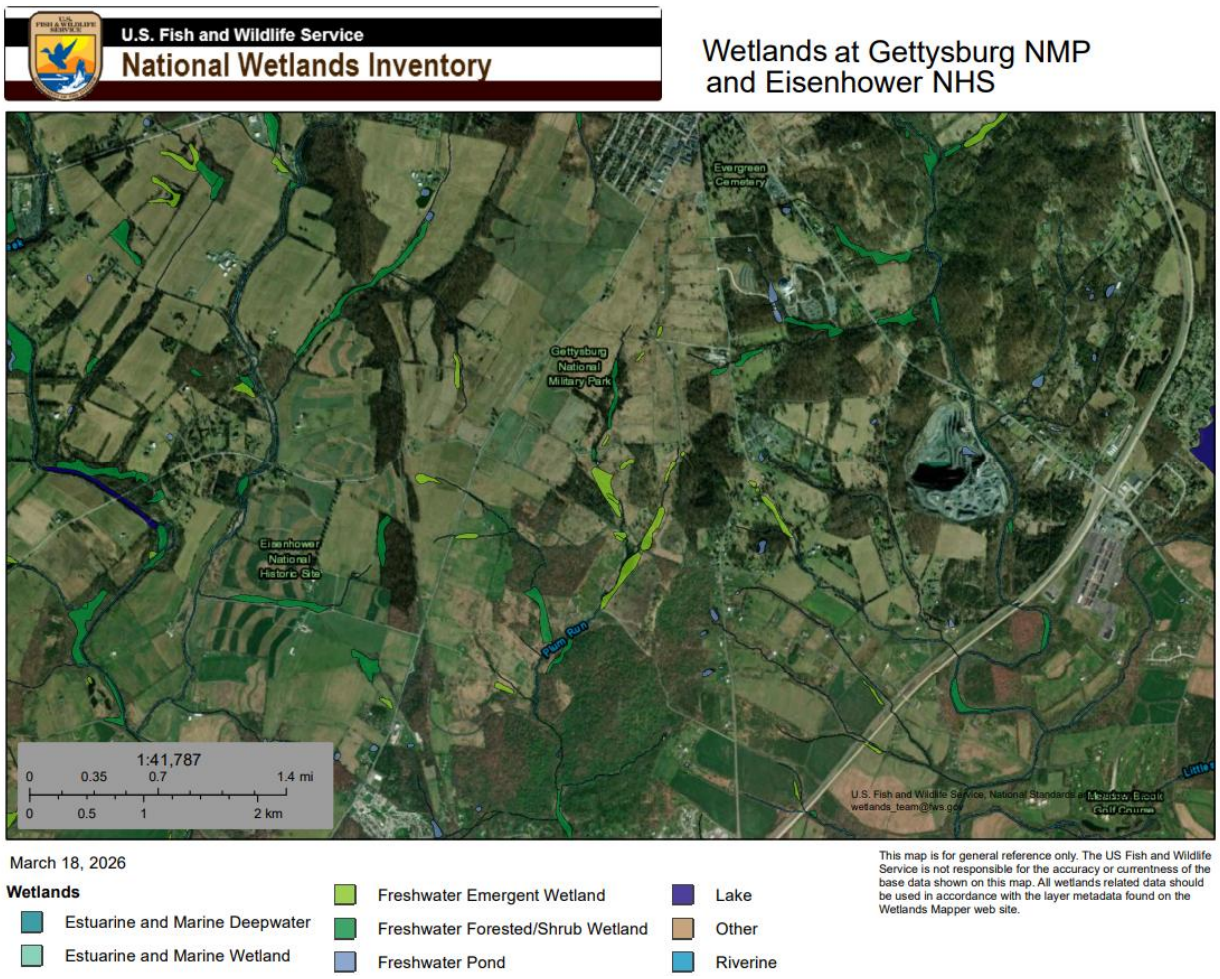


FIGURE 3. WETLANDS AT GETTYSBURG NMP AND EISENHOWER NHS

3.3.2 No Action Alternative

Under the No Action Alternative, existing trail-related effects on wetlands would continue. Formal horse and pedestrian trails intersect an estimated 0.08 acre of wetland, and existing social trails affect an estimated additional 0.02 acre. Without new trail development or closure of social trails, these existing conditions would remain.

Under the No Action Alternative, impacts to wetlands would continue. Assuming a 12-foot buffer around trail alignments overlaid to wetland polygons identified in the National Wetlands Inventory (NWI), an estimated area of disturbance intersected with wetlands can be determined. Thus, existing horse and pedestrian trails can impact approximately 0.08 total acres of wetland in the park (i.e., 0.01 acres in intermittent/seasonal drainages, 0.02 acres in freshwater emergent wetland, and 0.05 acres in freshwater forested/shrub wetlands). Other existing trail types do not intersect wetlands.

The continued use of social trails can impact wetlands as they deviate from formalized paths and can create foot traffic on and near wetlands areas. Social trail impacts to wetlands, using the

same methodology described above, show approximately 0.02 acres of impact from existing social trails. However, some locations where social trails may cross wetlands do not always correspond with proposed trail closures, establishment, or reroutes.

3.3.3 Proposed Action

Several proposed trails would cross or pass near streams or wetlands. Final alignments would avoid wetlands where practicable, and formalizing visitor routes and closing social trails could reduce recurring disturbance caused by informal foot traffic. Where wetland crossings cannot be avoided, design measures such as boardwalks or similar structures would be used to minimize effects.

Using a 12-foot buffer around proposed trail alignments and National Wetlands Inventory polygons, the plan estimates approximately 0.36 acre of potential wetland disturbance, primarily associated with proposed mowed trails. The proposed pedestrian bridge over Willoughby Run would affect an addition 0.02 to 0.03 acres.

Consistent with NPS wetland policy, the NPS would first avoid adverse wetland impacts to the extent practicable and then minimize impacts that cannot be avoided. Wetlands along proposed alignments would be delineated before final trail locations are selected. Where required, the NPS would prepare a Wetland Statement of Findings for individual projects.

Construction would use erosion and sediment controls, and temporarily disturbed wetland areas would be revegetated with native species. These measures, together with site-specific alignment adjustments and appropriate crossing structures, would minimize wetland disturbance during implementation.

Throughout the planning process, the NPS designed proposed trail segments to avoid delineated wetland areas. Unavoidable wetland disturbance would be minimized by constructing boardwalks or similar structures through these areas. Additionally, construction activities would implement erosion and sediment controls to reduce sediment transport into nearby wetlands. Following trail construction, the NPS would reestablish vegetation in temporarily disturbed wetland areas using native species to minimize invasive species establishment and promote wetland continuation.

3.4 Vegetation, Habitat, and Soil

3.4.1 Affected Environment

The variety of habitats within the parks, ranging from forests to wetlands, provides home to 553 species of vascular plants, 410 of which are native. The Pennsylvania Natural Diversity Inventory has also listed 23 of these plants as endangered, threatened, or species of special concern (NPS, 2025). In the forested areas of Gettysburg NMP, the dominant overstory species documented in woodlots and woodlands are white oak, shagbark hickory, tulip poplar, and

northern red oak. Besides woody plant species, there are an abundant variety of herbaceous plants and wildflowers that occupy both forested and open areas.

Open fields and field edges boast a diverse mixture of vegetation for wildlife to utilize for habitat, foraging, and nesting. Gettysburg NMP is actively transitioning portions of agricultural lands into warm season grasses to encourage a more diverse plant community for open-upland bird species.

Much of Gettysburg NMP and Eisenhower NHS are grassland habitat. Grasslands provide habitat for wildlife and nesting birds and are one of the most endangered ecosystems globally. Grassland birds require large contiguous patches of grassland habitat for successful breeding. Many grassland birds only nest in this type of open grassland habitat. A decline in grassland habitat, including fragmentation, causes a decrease in the number of breeding birds.

The parks are designated as part of several Important Bird Areas in Pennsylvania set aside to protect birds and grassland habitat. In an effort to maintain the characteristics of the 1863 landscape, Gettysburg NMP has converted many of the main battle action resource areas from large agricultural fields to smaller contiguous patches of native grasses. Restored field patterns better reflect historic 1863 conditions and provide valuable grassland habitat to bird species. At Eisenhower NHS, the NPS manages the landscape to mimic agricultural practices adopted under General Eisenhower. This includes contour planting, crop rotation, and pasture management. Some of the historic cattle and horse pasture are now grass and hay fields.

Primary goals of the Gettysburg NMP's vegetation management are to: 1) restore and perpetuate the battlefield as it appeared at the time of the Battle of Gettysburg in July 1863; and 2) preserve resident fauna and flora that are compatible with the goal of historic accuracy. The primary management goals at Eisenhower NHS are to keep fields in active pasture and grass and hay fields to mimic the agricultural practices employed by General Eisenhower.

Park personnel conduct floral inventories, monitor seedling recruitment, and map vegetative cover types. Park staff also work to combat several invasive plant species such as the multiflora rose (*Rosa multiflora*), Japanese barberry (*Berberis japonicus*), tree-of-heaven (*Ailanthus altissima*), and mile-a-minute (*Persicaria perfoliata*). Park staff, with the help of the Mid-Atlantic Plant Management Team and a team of volunteers, treat these invasive species by chemical methods, mechanical methods, and hand pulling during the spring and summer growing seasons.

Soil conditions vary throughout the existing trail system. Trails with low spots may not have adequate drainage, which can cause saturation and muddiness. This leads users to walk or bicycle around those spots, thus compacting soil along the edges. Any steep areas of trail may cause water to more easily channel, resulting in increased erosion and associated runoff.

3.4.2 No Action Alternative

Under the No Action Alternative, existing impacts to vegetation, habitat, and soils would continue. Social trails, unauthorized parking, and other informal use would continue to disturb vegetation and sensitive habitat even as the NPS performs routine vegetation and trail maintenance.

Under the No Action Alternative, social trails, unauthorized parking, and other forms of human disturbance would continue to impact vegetation and habitat. Although the NPS would continue regular vegetative and trail maintenance, visitors would also continue to traverse in unauthorized areas, including sensitive habitat and sensitive vegetative populations within Gettysburg NMP and Eisenhower NHS. Therefore, these conditions and trends of impacted vegetation and habitat would persist.

3.4.3 Proposed Action

The Proposed Action would formalize visitor circulation and close selected social trails, directing visitors toward designated routes and away from sensitive areas. Designated parking would similarly reduce informal parking in grasslands and other vegetated areas.

Construction could temporarily disturb vegetation and soils through grading, selective tree removal, removal of herbaceous vegetation, or work near riparian areas. Ground disturbance could also create opportunities for non-native invasive plants to become established.

To minimize these effects, trail and parking alignments would use previously disturbed areas and avoid sensitive resources where practicable. Where tree removal is necessary, the NPS would consider minor adjustments to alignments and widths to retain canopy. Temporarily disturbed areas would be revegetated with native species following construction.

Hiking, bicycling, horseback riding, dog walking, and other recreational uses can compact soils and contribute to erosion, runoff, and sedimentation, particularly where trails are poorly drained or heavily used. Sustainable trail design, drainage improvements, defined routes, and ongoing maintenance would reduce these effects. Additional mitigation and management measures are described in Section 2.2.

Recreational activities like hiking and biking can impact soil erosion and the stability of trails, which can further impact water quality. Many studies have evaluated the relationship between outdoor recreation and trail quality. For example, hiking, jogging, and biking can compact soil and reduce litter that covers topsoil. This then disrupts groundwater flow paths, facilitating erosion and runoff (Cooke and Zia, 2020). Horseback riding, dog walking, and camping are other trail uses that can result in greater environmental impacts due to heavier weight loads, a greater number of footsteps per unit, and repetitive use of specific areas (Cooke and Zia, 2020). In turn, this can lead to greater sedimentation on trails and into waterways, soil compaction, and

nitrification. However, these impacts from recreation can be mitigated through trail design and management (Marion, 2016). Additional information can be found in Section 2.2.

3.5 Threatened and Endangered Species

3.5.1 Affected Environment

Federally Listed Species

Information obtained through the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) website on August 11, 2026 did not identify any critical habitat within the project area (see Appendix B – Threatened and Endangered Species List). Several federally listed species may occur in the project area. Table 5 summarizes these species. The project area has suitable habitat for several bat species.

TABLE 5. FEDERALLY LISTED SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT AREA

Common Name	Scientific Name	Listing
Mammals		
Indiana bat	*Myotis sodalis*	Endangered
Northern long-eared bat	*Myotis septentrionalis*	Endangered
Tricolored bat	*Perimyotis subflavus*	Proposed Endangered
Virginia big-eared bat	*Corynorhinus townsendii virginianus*	Endangered
Clams		
Green floater	*Lasmigona subviridis*	Proposed Threatened
Insects		
Monarch butterfly	*Danaus plexippus*	Proposed Threatened

Bat species utilize trees and forested habitat for nesting, roosting, and foraging. There are no known maternity roost trees or hibernacula in the vicinity of Gettysburg NMP or Eisenhower NHS.

State Listed Species

Several state-listed species also have the potential to occur in the action area. Table 6 below summarizes these species.

TABLE 6. STATE LISTED SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT AREA

Common Name	Scientific Name	Listing
Mammals		
Least shrew	*Cryptotis parva*	Endangered
Plants		
Bicknell's Hoary Rockrose	*Crocanthemum bicknellii*	Endangered
Short-fruited Rush	*Juncus brachycarpus*	Endangered
Shumard's oak	*Quercus shumardii*	Endangered

State-listed endangered plants in the action area include Bicknell's Hoary Rockrose (Crocanthemum bicknellii), short-fruited rush (Juncus brachycarpus), and Shumard's oak (Quercus shumardii).

Pennsylvania lists the least shrew (*Cryptotis parva*) as endangered and protected under the state's Game and Wildlife Code. It also is a priority species in the state's Wildlife Action Plan. Since 1990, surveys found the least shrew at only three isolated sites in York and Adams Counties, with possibly one of the most extensive populations occurring within Eisenhower NHS. A new least shrew survey is currently underway at the parks to better understand the location and abundance of the resident shrew populations. The least shrew primarily lives in meadows, pastures, old fields, and other non-forested habitats, and like most shrews, prefers wetter areas within these habitats. Park protocols for mowing generally discourage creating mowed paths through the wet or mesic habitat preferred by this species. Least shrews live much of their lives in underground burrows and emerge mainly at night to forage for insects and larvae. Early spring mating season is the most sensitive time of year for least shrews, as vegetation has not yet germinated or exited dormancy, meaning concealment from grassland predators remains sparse.

Both state and federally listed species experience impacts from visitors who use undesignated social trails.

3.5.2 No Action Alternative

Under the No Action Alternative, visitors would continue to use social trails, including routes that cross or approach sensitive habitat. No new trails would be constructed or realigned specifically to direct visitors away from habitat used by, or suitable for, listed species. Existing conditions and associated disturbance would therefore continue.

Under the No Action Alternative, visitors would continue to use social trails, including those that traverse over sensitive habitat within Gettysburg NMP and Eisenhower NHS. The NPS would construct no new trails and would not realign existing trails to avoid habitat used by or suitable for listed species.

Under the No Action Alternative, the conditions described in the affected environment would persist. Sensitive habitats and populations of federally and state listed species would remain vulnerable to ongoing disturbance from visitors using unauthorized social trails. Without new trail construction or realignment, there would be no reduction in habitat fragmentation or avoidance of sensitive areas, resulting in continued adverse impacts to endangered and threatened species.

3.5.3 Proposed Action

The Proposed Action would construct and realign trails while closing selected social trails. Directing visitors to designated routes and away from sensitive habitat could reduce recurring

disturbance to listed species and their habitat; however, construction and maintenance activities could also create temporary site-specific effects that would require avoidance and minimization measures.

For listed bat species, the NPS would minimize tree removal through trail design and alignment adjustments. Where tree removal cannot be avoided, work would follow applicable seasonal restrictions and conservation measures identified through consultation.

Before construction in areas with potential rare-plant habitat, a qualified professional would conduct site-specific surveys as appropriate. Confirmed occurrences would be delineated, and trail alignments would be adjusted to avoid disturbance where practicable.

Proposed trails are intended to avoid identified least-shrew habitat, with a possible exception along the proposed mowed Camp Colt Trail where potential habitat may be adjacent to or intersect the alignment. Final design and project-specific review would address this area and apply appropriate avoidance or minimization measures.

The NPS has determined that due to the nature of the work and that no critical habitat is found in the area, the Proposed Action would have No Effect on the monarch butterfly or the green floater. Based on the IPaC submission and a standing analysis completed by the USFWS, the NPS determined that the Proposed Action would result in a Not Likely to Adversely Affect determination for the four bat species (see Appendix B):

Because the Trails Plan is programmatic, consultation and conservation requirements would continue to be addressed as individual projects are developed. The NPS would coordinate with the U.S. Fish and Wildlife Service and appropriate Pennsylvania agencies to confirm applicable measures before construction near sensitive species or habitat.

4 CONSULTATION AND COORDINATION

The NPS conducted consultation and coordination with federal and state agencies and other interested parties to identify issues and/or concerns related to park resources. Individual trail segments may require more detailed Section 106 NHPA and Section 7 ESA consultation and review, and will follow applicable agreements or regulations, as necessary. This section summarizes the public involvement and agency consultation and coordination that occurred before and during the preparation of this EA.

4.1 Public Involvement

Park staff engaged with several organizations, including Healthy Adams County, Healthy Adams Bicycle/Pedestrian (HABPI), and the Licensed Battlefield Guides, through hour-long hybrid meetings on-site and through Microsoft Teams on December 17-18, 2025. The park invited board members, volunteers, and self-employed guides to attend and provide feedback on several maps summarizing the proposed action. Participants were encouraged to submit additional comments in writing, including those that were not able to attend.

The NPS will hold a 30-day public comment period for the EA, which will include a public meeting.

4.2 Agencies and Persons Consulted

Consultation and coordination with federal, state, and local agencies, and American Indian tribes was also conducted to identify issues and concerns related to natural and cultural resources within Gettysburg NMP and Eisenhower NHS. Below is a list of agencies and persons consulted during planning, including the previous effort that was paused in 2018.

- Adams County Office of Planning and Development
- Association of Licensed Battlefield Guides
- Central Pennsylvania Transportation Authority
- American Battlefield Trust
- Confederate Trails of Gettysburg
- Cumberland Township
- Delaware Nation
- Delaware Tribe of Indians
- GettysBike Tours
- Gettysburg Area School District
- Gettysburg Battlefield Tours
- Gettysburg Borough
- Gettysburg College
- Gettysburg Equestrian Historical Society
- Gettysburg Foundation

- Gettysburg Lutheran Theological Seminary
- Healthy Adams Bicycle/Pedestrian Inc.
- Healthy Adams Physical Fitness Task Force
- History in the Making
- Main Street Gettysburg
- Mount Joy Township
- Mt. Pleasant Township
- National Riding Stables
- Pennsylvania Department of Conservation and Natural Resources
- Pennsylvania Department of Transportation
- Pennsylvania Equine Council
- Pennsylvania Fish and Boat Commission
- Pennsylvania Game Commission
- Pennsylvania Historical and Museum Commission
- Segway Tours of Gettysburg
- Seneca-Cayuga Tribe of Oklahoma
- Straban Township
- US Fish and Wildlife Service
- Western Pennsylvania Conservancy
- York Adams Transit Authority

As the actions described in the Proposed Action are further planned and implemented, they may require more detailed Section 106 consultation. Future Section 106 consultation for individual actions would follow the NPS Section 106 Nationwide Programmatic Agreement and if necessary, the Advisory Council on Historic Preservation Section 106 regulations. Similarly, implementation may require more detailed Section 7 consultation with the United States Fish and Wildlife Service.

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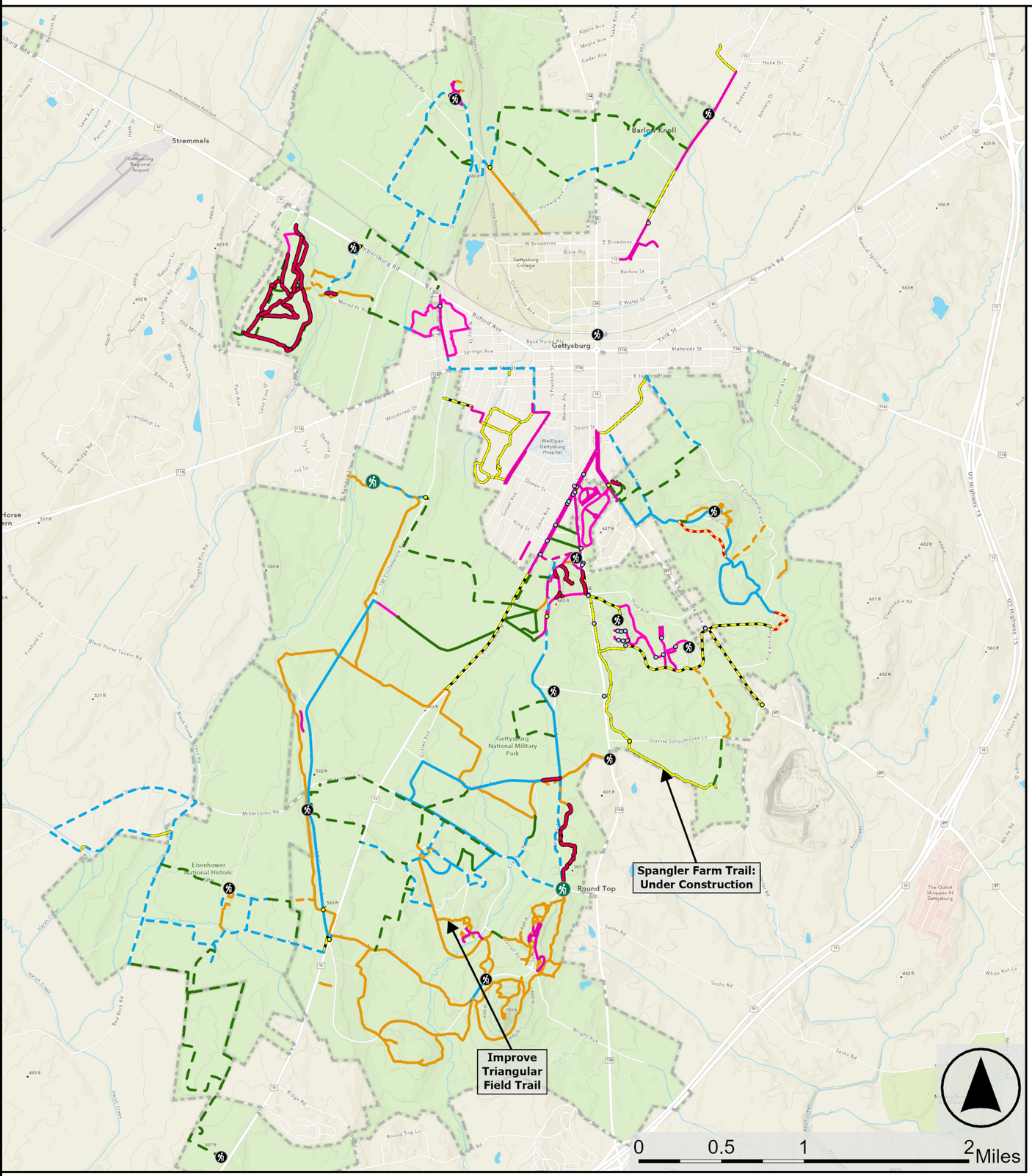
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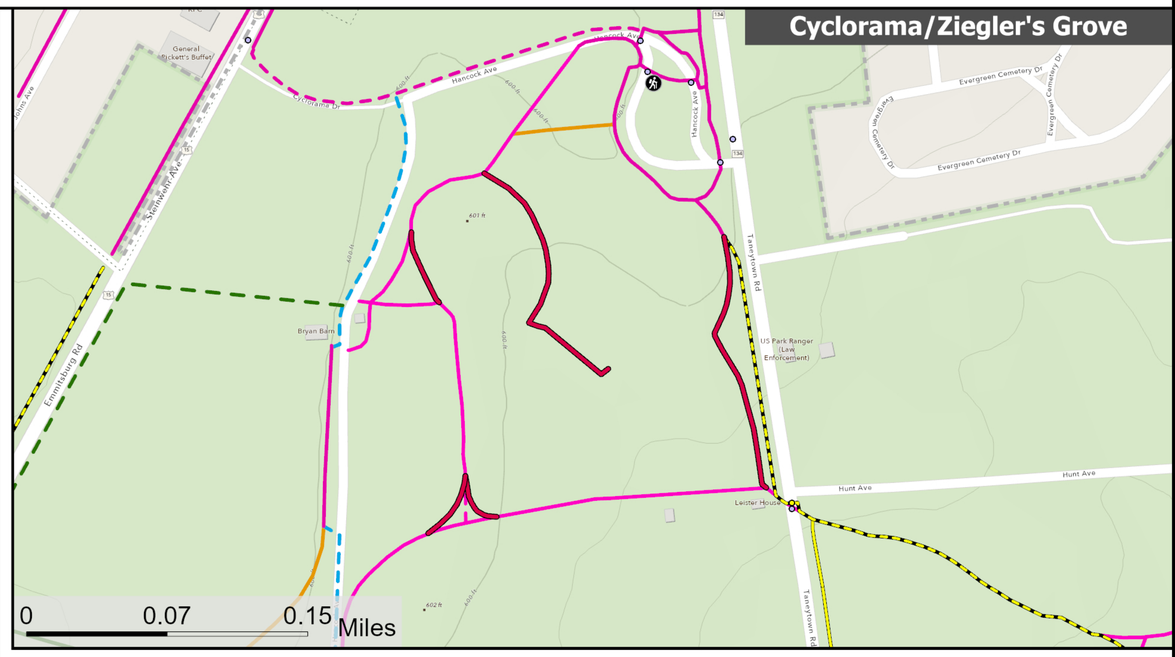
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Gettysburg National Military Park and Eisenhower National Historic Site Trails Plan Draft Environmental Assessment

Appendix A: Maps

GETT-EISE Current and Proposed Pedestrian Facilities and Routes





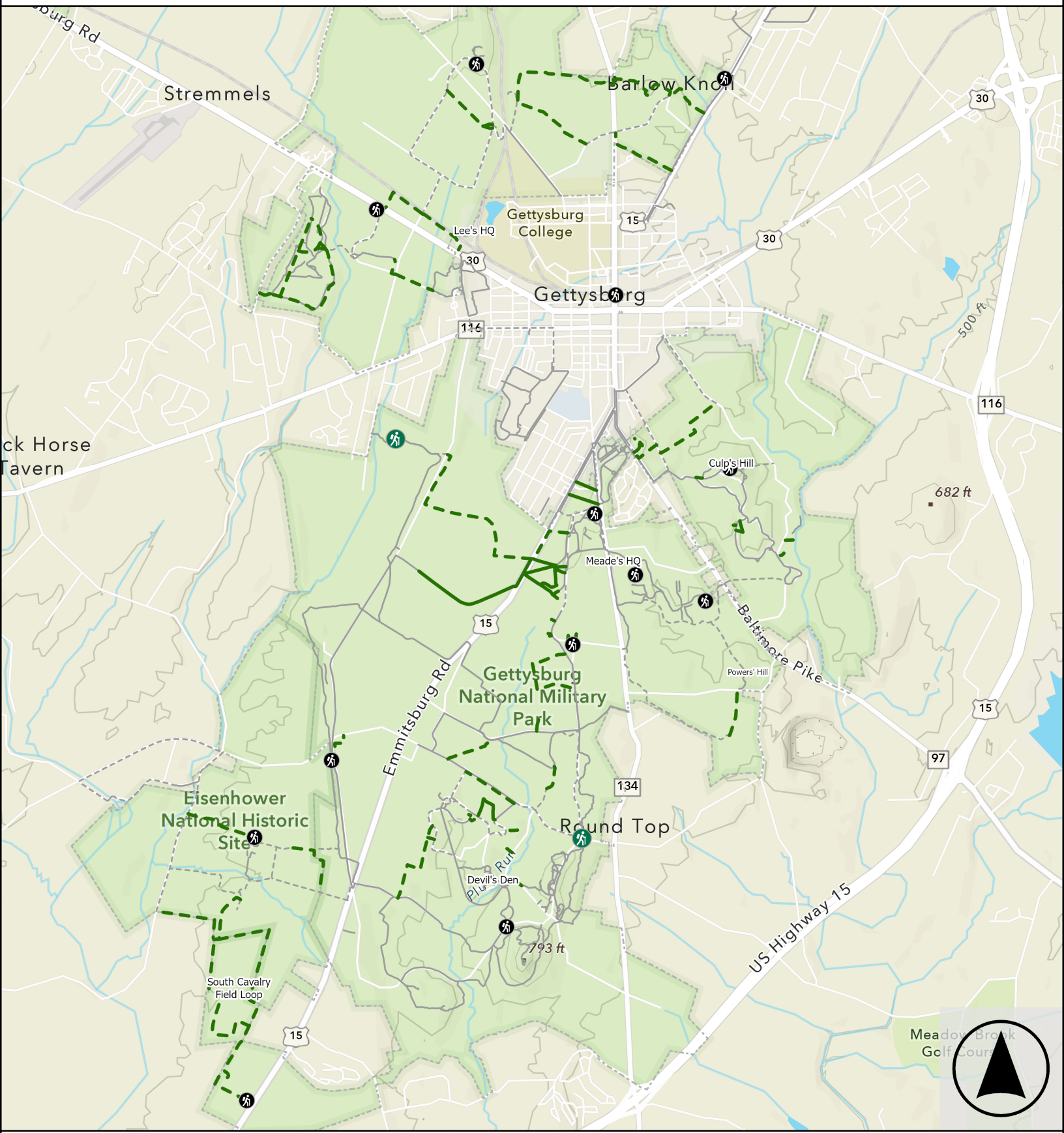


Legend

- Trailhead
- Proposed Trailhead
- Existing Crosswalk
- Proposed Crosswalk
- Existing Pedestrian Trails
- Proposed Pedestrian Trails
- Existing Mowed Paths
- Proposed Mowed Paths
- Existing Multi Use Trails
- Proposed Multi Use Trails
- Existing Pedestrian Walkway
- Proposed Pedestrian Walkway
- Existing On-Road Pedestrian Route
- Recommended Visitor On-Road Pedestrian Routes
- Trails to Remove
- Proposed Auto Closures
- Park Boundary

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

GETT-EISE Current and Proposed Mowed Paths



Legend

- Trailheads
- Proposed Trailheads
- Proposed Mowed Paths
- Existing Mowed Paths
- Proposed Pedestrian Trails or Routes
- Existing Pedestrian Trails or Routes
- Park Boundaries

0 0.5 1 2 Miles

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

GETT-EISE Current and Proposed Bike Facilities and Routes

Under Construction

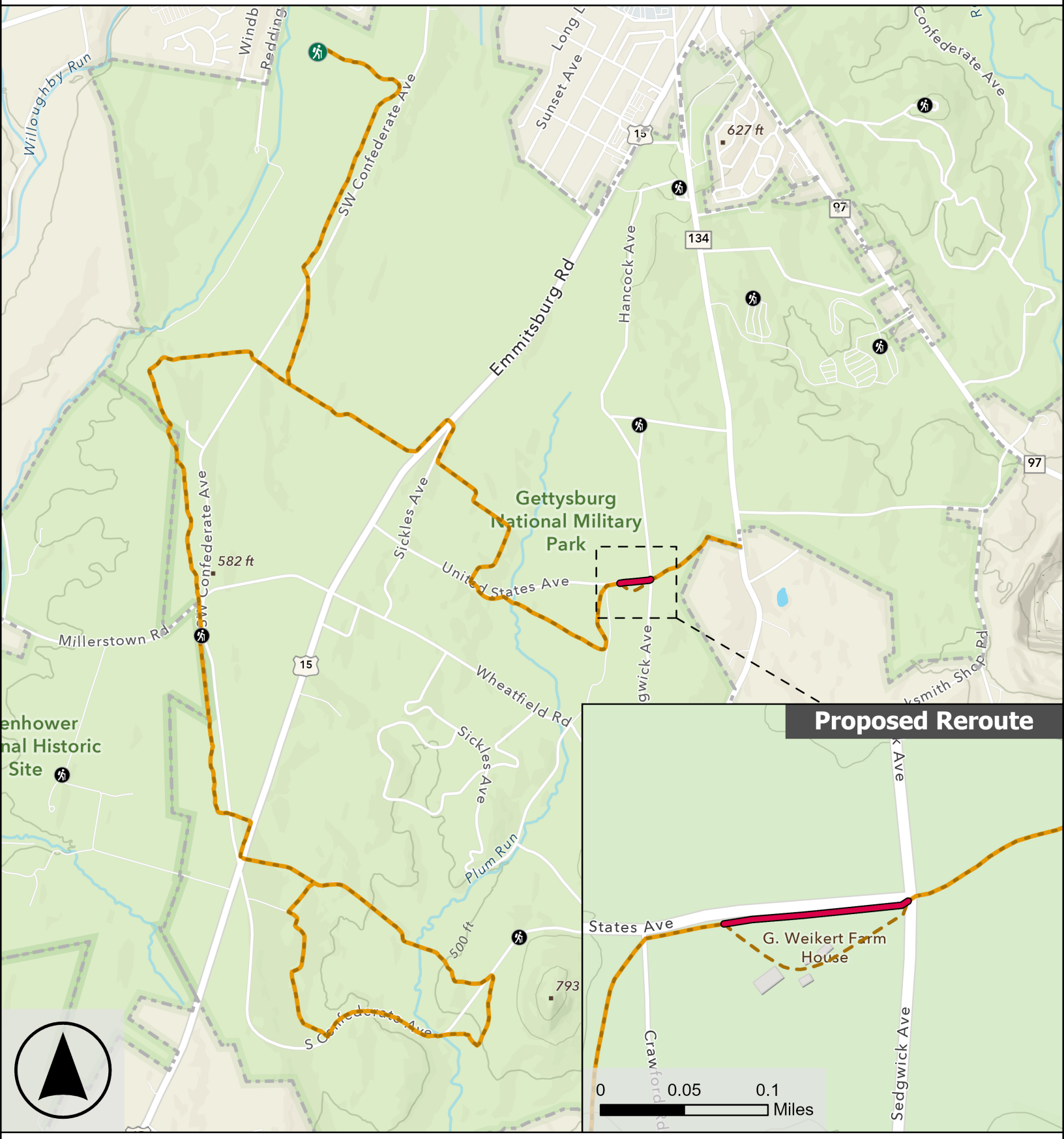
0 0.5 1 2 Miles

Legend

- Bike Work Stations
- Bike Parking
- Existing Multi Use Trails
- Proposed Multi Use Trails
- Proposed Auto Closures
- Existing On-Road Bike Route
- Recommended Visitor On-Road Bike Routes
- Trailhead
- Proposed Trailhead
- Park Boundaries

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

GETT-EISE Current and Proposed Equestrian Facilities



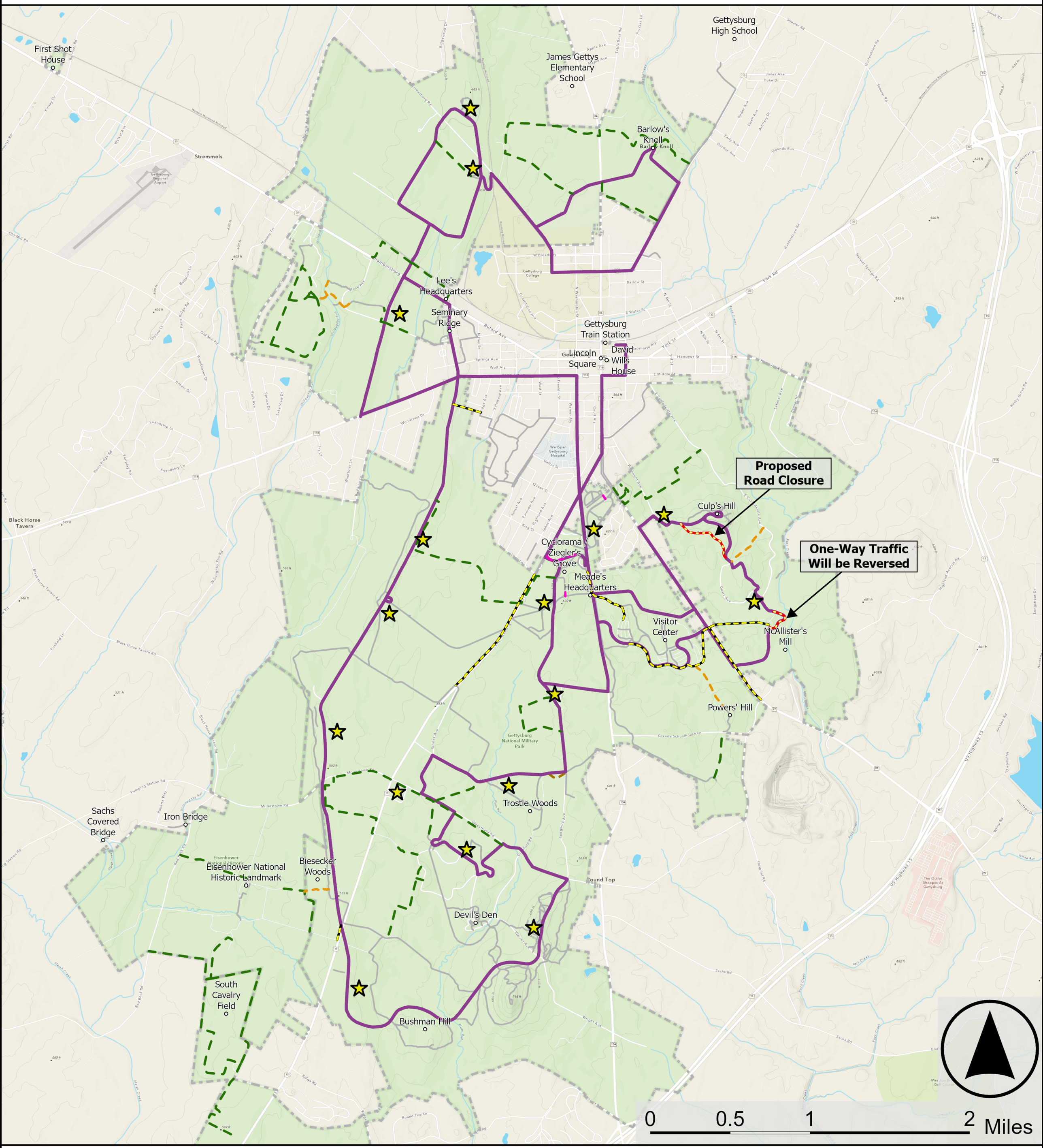
Legend

- Existing Equestian/ Pedestrian Trails
- Proposed Equestrian Reroutes
- Trails to Remove
- Trailheads
- Proposed Trailheads
- Park Boundaries

0 0.25 0.5 1 Miles

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Gettysburg Auto Tour Route and Proposed Trails



Legend

- Auto Tour Stop
- Auto Tour Route
- Proposed Auto Closures
- Proposed Multi Use Trails
- Proposed Pedestrian Trails
- Proposed Mowed Paths
- Proposed Pedestrian Walkway
- Proposed Equestrian Reroutes
- Existing Trails
- Points of Interest
- Park Boundaries

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pennsylvania Ecological Services Field Office
110 Radnor Road Suite 101
State College, PA 16801-7987
Phone: (814) 298-4396

In Reply Refer To: 08/11/2026 14:44:21 UTC
Project Code: 2026-0130146
Project Name: Gettysburg NMP and Eisenhower NHS Trails Plan EA

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

- USFWS National Wildlife Refuges and Fish Hatcheries

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Pennsylvania Ecological Services Field Office
110 Radnor Road Suite 101
State College, PA 16801-7987
(814) 298-4396

PROJECT SUMMARY

Project Code: 2026-0130146

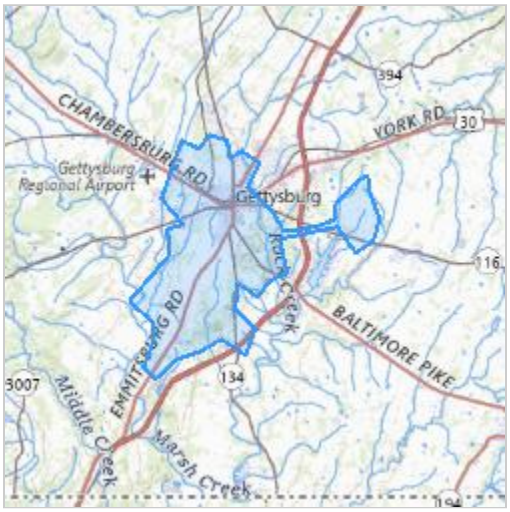
Project Name: Gettysburg NMP and Eisenhower NHS Trails Plan EA

Project Type: Recreation - Maintenance / Modification

Project Description: The National Park Service (NPS) seeks to improve visitor access to the parks' interpretive sites, and connections between the two parks by integrating existing trails with new trail alignments to create a network of trails that reduce reliance on vehicles while minimizing impacts to the battlefield, natural resources, and commemorative-era landscapes. NPS would adopt a Comprehensive Trails Plan for Gettysburg NMP and Eisenhower NHS, which would occur over a 10- to 15-year period. During this phased buildout, operational responsibilities would be managed through a structured approach that assigns and updates roles as new trails come online, ensuring that each phase is supported by appropriate oversight and resources. The Trails Plan includes constructing new multi-use and pedestrian trails, rerouting existing equestrian trails, and adding interpretive trailheads. The Trails Plan would also eliminate social trails and close specific park avenues to increase safety and connectivity.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.8086678,-77.23587891639893,14z



Counties: Adams County, Pennsylvania

ENDANGERED SPECIES ACT SPECIES

There is a total of 6 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Indiana bat *Myotis sodalis* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-Eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored bat *Perimyotis subflavus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered
Virginia big-eared bat *Corynorhinus (=Plecotus) townsendii virginianus* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8369	Endangered

CLAMS

NAME	STATUS
Green floater *Lasmigona subviridis* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7541	Proposed Threatened

INSECTS

NAME	STATUS
Monarch butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Department of Transportation
Name: Thomas Bonetti
Address: 300 Westgate Center Drive
City: Hadley
State: MA
Zip: 01035
Email thomasbonetti11@gmail.com
Phone: 4135440621

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Park Service
Name: Thomas Bonetti
Email: thomas.bonetti@dot.gov
Phone: 4135440621

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pennsylvania Ecological Services Field Office
110 Radnor Road Suite 101
State College, PA 16801-7987
Phone: (814) 298-4396

In Reply Refer To: 08/11/2026 15:39:02 UTC
Project code: 2026-0130146
Project Name: Gettysburg NMP and Eisenhower NHS Trails Plan EA

Federal Nexus: yes
Federal Action Agency (if applicable): National Park Service

Subject: Federal agency coordination under the Endangered Species Act, Section 7 for 'Gettysburg NMP and Eisenhower NHS Trails Plan EA'

Dear Thomas Bonetti:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on August 11, 2026, for 'Gettysburg NMP and Eisenhower NHS Trails Plan EA' (here forward, Project). This project has been assigned Project Code 2026-0130146 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements may not be complete.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (DKey), invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid. Note that conservation measures for northern long-eared bat and tricolored bat may differ. If both bat species are present in the action area and the key suggests more conservative measures for one of the species for your Project, the Project may need to apply the most conservative measures in order to avoid adverse effects. If unsure which conservation measures should be applied, please contact the appropriate Ecological Services Field Office.***

Determination for the Northern Long-Eared Bat and Tricolored Bat

Based on your IPaC submission and a standing analysis completed by the Service, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Northern Long-Eared Bat (*Myotis septentrionalis*)	Endangered	NLAA
Tricolored bat (*Perimyotis subflavus*)	Proposed Endangered	NLAA

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate.

Unless the Service advises you within 15 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that consultation on the Action is complete for northern long-eared bat and/or tricolored bat and no further action is necessary unless either of the following occurs:

- new information reveals effects of the action that may affect the northern long-eared bat or tricolored bat in a manner or to an extent not previously considered; or,
- the identified action is subsequently modified in a manner that causes an effect to the northern long-eared bat or tricolored bat that was not considered when completing the determination key.

15-Day Review Period

As indicated above, the Service will notify you within 15 calendar days if we determine that this proposed Action does not meet the criteria for a “may affect, not likely to adversely affect” (NLAA) determination for the northern long-eared bat and/or tricolored bat. If we do not notify you within that timeframe, you may proceed with the Action under the terms of the NLAA concurrence provided here. This verification period allows the identified Ecological Services Field Office to apply local knowledge to evaluation of the Action, as we may identify a small subset of actions having impacts that we did not anticipate when developing the key. In such cases, the identified Ecological Services Field Office may request additional information to verify the effects determination reached through the Northern Long-eared Bat and Tricolored Bat DKey.

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Green floater *Lasmigona subviridis* Proposed Threatened
- Indiana bat *Myotis sodalis* Endangered
- Monarch butterfly *Danaus plexippus* Proposed Threatened
- Virginia big-eared bat *Corynorhinus (=Plecotus) townsendii virginianus* Endangered

You may coordinate with our Office to determine whether the Action may affect the species and/or critical habitat listed above. Note that reinitiation of consultation would be necessary if a new species is listed or critical habitat designated that may be affected by the identified action before it is complete.

If you have any questions regarding this letter or need further assistance, please contact the Pennsylvania Ecological Services Field Office and reference Project Code 2026-0130146 associated with this Project.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

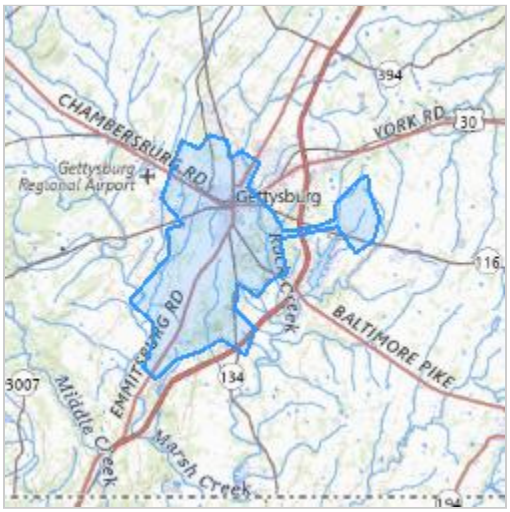
Gettysburg NMP and Eisenhower NHS Trails Plan EA

2. Description

The following description was provided for the project 'Gettysburg NMP and Eisenhower NHS Trails Plan EA':

> The National Park Service (NPS) seeks to improve visitor access to the parks' interpretive sites, and connections between the two parks by integrating existing trails with new trail alignments to create a network of trails that reduce reliance on vehicles while minimizing impacts to the battlefield, natural resources, and commemorative-era landscapes. NPS would adopt a Comprehensive Trails Plan for Gettysburg NMP and Eisenhower NHS, which would occur over a 10- to 15-year period. During this phased buildout, operational responsibilities would be managed through a structured approach that assigns and updates roles as new trails come online, ensuring that each phase is supported by appropriate oversight and resources. The Trails Plan includes constructing new multi-use and pedestrian trails, rerouting existing equestrian trails, and adding interpretive trailheads. The Trails Plan would also eliminate social trails and close specific park avenues to increase safety and connectivity.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.8086678,-77.23587891639893,14z



DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect, but not likely to adversely affect” for a least one species covered by this determination key.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species that is not covered by an existing section 10 (a)(1)(A) Recovery Permit, exempted under section 4(d) or authorized by a section 6 cooperative agreement? **Note:** Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/ encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

   No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

4. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

   No

5. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

   Note for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer ‘yes’ to this question.

   Yes

6. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

   No

7. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

   Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

   Yes

8. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

   No

9. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

   No

10. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

    Automatically answered

    No

11. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

    No

12. Does the action area contain (1) talus or (2) anthropogenic or naturally formed rock shelters or crevices in rocky outcrops, rock faces or cliffs?

    No

13. Is the action located in New England (CT, MA, ME, NH, RI, or VT)?

    No

14. Will the action cause effects to a bridge?

    Note: Covered bridges should be considered as bridges in this question.

    No

15. Will the action result in effects to a culvert or tunnel at any time of year?

    No

16. Are trees present within 1000 feet of the action area? **Note:** If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    Yes

17. Does the action include the intentional exclusion of bats from a building or building-like structure? **Note:** Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

    No

18. Does the action involve removal, modification, or maintenance of a human-made building-like structure (barn, house, or other building) **known or suspected to contain roosting bats?**

    No

19. Will the action cause construction of one or more new roads open to the public?

    For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    No

20. Will the action include or cause any construction or other activity that is reasonably certain to increase average night-time traffic permanently or temporarily on one or more existing roads? **Note:** For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

    No

21. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

    For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    No

22. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

    Note: For information regarding NSF/ANSI 60 please visit https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects

    No

23. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

    No

24. Will the action include drilling or blasting?

    No

25. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use at night)?

    No

26. Will the proposed action involve the use of herbicides or pesticides (e.g., fungicides, insecticides, or rodenticides)?

    No

27. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season? Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining. **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    No

28. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable forested northern long-eared bat or tricolored bat roosting habitat? **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    No

29. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

    Yes

30. Is the project related to the production of coal, including projects that support the mining of coal, as well as the production and/or distribution of energy produced from coal?

    No

31. Will the proposed action occur exclusively in an already established and currently maintained utility right-of-way?

    No

32. Does the action include emergency cutting or trimming of hazard trees in order to remove an imminent threat to human safety or property? See hazard tree note at the bottom of the key for text that will be added to response letters

    Note: A "hazard tree" is a tree that is an immediate threat to lives, public health and safety, or improved property.

    No

33. Does the project intersect with the 0- 9.9% forest density category?

    Automatically answered
    No

34. Does the project intersect with the 10.0- 19.9% forest density category map?

    Automatically answered
    Yes

35. Does the project intersect with the 20.0- 29.9% forest density category map?

    Automatically answered
    Yes

36. Does the project intersect with the 30.0- 100% forest density category map?

    Automatically answered
    Yes

37. Will the action cause trees to be cut, knocked down, or otherwise brought down across an area greater than 5 acres in total extent?

    No

38. Will the proposed action result in the use of prescribed fire?

    Note: If the prescribed fire action includes other activities than application of fire (e.g., tree cutting, fire line preparation) please consider impacts from those activities within the previous representative questions in the key. This set of questions only considers impacts from flame and smoke.

    No

39. Does the action area intersect the northern long-eared bat species list area?

    Automatically answered
    Yes

40. [Semantic] Is the action area located within 0.5 miles of radius of an entrance/opening to any known NLEB hibernacula or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

41. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats? **Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

42. [Semantic] Is the action area located within 150 feet of a documented northern long-eared bat roost site?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.Have you contacted the appropriate agency to determine if your action is within 150 feet of any documented northern long-eared bat roosts?

    Note: A document with links to Natural Heritage Inventory databases and other state-specific sources of information on the locations of northern long-eared bat roosts is available here. Location information for northern long-eared bat roosts is generally kept in state natural heritage inventory databases – the availability of this data varies by state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited.

    Automatically answered
    No

43. Is suitable summer habitat for the northern long-eared bat present within 1000 feet of project activities? If unsure, answer "Yes." **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines

    Yes

44. Are any of the trees proposed for cutting or other means of knocking down, bringing down, topping, or trimming suitable for northern long-eared bat roosting (i.e., live trees and/or snags ≥3 inches dbh that have exfoliating bark, cracks, crevices, and/or cavities)? **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    No

45. Does the action area intersect the tricolored bat species list area?

    Automatically answered
    Yes

46. Is the action area located within 0.5-mile of radius of an entrance/opening to any known tricolored bat hibernacula or winter roost?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

    Automatically answered
    No

47. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats? **Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

48. Is suitable summer habitat for the tricolored bat present within 1000 feet of project activities? (If unsure, answer ""Yes."") **Note:** If there are trees within the action area that may provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pines) answer ""Yes."" For a complete definition of suitable summer habitat for the tricolored bat, please see the Service's Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines.

    Yes

49. Do any of the trees proposed for cutting or other means of knocking down, bringing down, topping, or trimming provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pine trees)? **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    No

50. Do you have any documents that you want to include with this submission?

    No

PROJECT QUESTIONNAIRE

Enter the extent of the action area (in acres) from which trees will be removed - round up to the nearest tenth of an acre. For this question, include the entire area where tree removal will take place, even if some live or dead trees will be left standing.

0.1

IPAC USER CONTACT INFORMATION

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City: Hadley
State: MA
Zip: 01035
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Phone: 4135440621

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Park Service
Name: Thomas Bonetti
Email: thomas.bonetti@dot.gov
Phone: 4135440621

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pennsylvania Ecological Services Field Office
110 Radnor Road Suite 101
State College, PA 16801-7987
Phone: (814) 298-4396

In Reply Refer To: 08/11/2026 15:30:47 UTC
Project code: 2026-0130146
Project Name: Gettysburg NMP and Eisenhower NHS Trails Plan EA

Federal Nexus: yes
Federal Action Agency (if applicable): National Park Service

Subject: Federal agency coordination under the Endangered Species Act, Section 7 for 'Gettysburg NMP and Eisenhower NHS Trails Plan EA'

Dear Thomas Bonetti:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on August 11, 2026, for "Gettysburg NMP and Eisenhower NHS Trails Plan EA" (here forward, Project). This project has been assigned Project Code 2026-0130146 and all future correspondence should clearly reference this number.

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into the IPaC must accurately represent the full scope and details of the Project. Failure to accurately represent or implement the Project as detailed in IPaC or the Northeast Indiana Bat Determination Key (DKey), invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

The IPaC results indicated the following species is (are) potentially present in your project area and, based on your responses to the Service's Northeast Indiana Bat DKey, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Indiana bat (*Myotis sodalis*)	Endangered	NLAA

Conclusion
The Service concurs to the above-mentioned determination(s) of may affect, not likely to adversely affect. This concurrence confirms receipt of your agencies coordination required under Section 7(a)(2) of the ESA.

The Service will notify you within 30 calendar days if we determine that this proposed Action does not meet the criteria for a “may affect, not likely to adversely affect” (NLAA) determination for Indiana bat in the Northeast. If we do not notify you within that timeframe, you may proceed with the Action under the terms of the NLAA concurrence provided here. This verification period allows the identified Ecological Services Field Office to apply local knowledge to evaluation of the Action, as we may identify a small subset of actions having impacts that were unanticipated. In such instances, the identified Ecological Services Field Office may request additional information to verify the effects determination reached through the Northeast Indiana Bat DKey.

Other Species and Critical Habitat that May be Present in the Action Area

In addition to the species listed above, the following species and/or critical habitats may also occur in your project area and are not covered by this conclusion:

- Green floater *Lasmigona subviridis* Proposed Threatened
- Monarch butterfly *Danaus plexippus* Proposed Threatened
- Northern Long-Eared Bat *Myotis septentrionalis* Endangered
- Tricolored bat *Perimyotis subflavus* Proposed Endangered
- Virginia big-eared bat *Corynorhinus (=Plecotus) townsendii virginianus* Endangered

If no changes occur with the Project or there are no updates on listed species, no further consultation/coordination for this project is required for the species identified above. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project implements any changes which are final or commits additional resources.

Please Note: If the Action may impact bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act (BGEPA) (54 Stat. 250, as amended, 16 U.S.C. 668a-d) by the prospective permittee may be required. Please contact the Migratory Birds Permit Office, (413) 253-8643, or PermitsR5MB@fws.gov, with any questions regarding potential impacts to Eagles.

If you have any questions regarding this letter or need further assistance, please contact the Pennsylvania Ecological Services Field Office and reference the Project Code associated with this Project.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

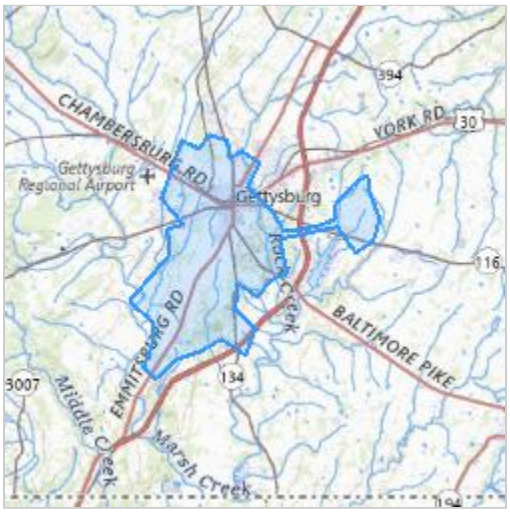
Gettysburg NMP and Eisenhower NHS Trails Plan EA

2. Description

The following description was provided for the project 'Gettysburg NMP and Eisenhower NHS Trails Plan EA':

> The National Park Service (NPS) seeks to improve visitor access to the parks' interpretive sites, and connections between the two parks by integrating existing trails with new trail alignments to create a network of trails that reduce reliance on vehicles while minimizing impacts to the battlefield, natural resources, and commemorative-era landscapes. NPS would adopt a Comprehensive Trails Plan for Gettysburg NMP and Eisenhower NHS, which would occur over a 10- to 15-year period. During this phased buildout, operational responsibilities would be managed through a structured approach that assigns and updates roles as new trails come online, ensuring that each phase is supported by appropriate oversight and resources. The Trails Plan includes constructing new multi-use and pedestrian trails, rerouting existing equestrian trails, and adding interpretive trailheads. The Trails Plan would also eliminate social trails and close specific park avenues to increase safety and connectivity.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.8086678,-77.23587891639893,14z



QUALIFICATION INTERVIEW

1. As a representative of this project, do you agree that all items submitted represent the complete scope of the project details and you will answer questions truthfully?

   Yes

2. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed species that is not covered by an existing section 10 (a)(1)(A) Recovery Permit, exempted under section 4(d) or authorized by a section 6 cooperative agreement?

   Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species.

   No

3. Is the action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

   Note: for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer ‘yes’ to this question.

   Yes

4. Are you including in this analysis all impacts to federally listed species that may result from the entirety of the project (not just the activities under federal jurisdiction)?

   Note: If there are project activities that will impact listed species that are considered to be outside of the jurisdiction of the federal agency submitting this key, contact your local Ecological Services Field Office to determine whether it is appropriate to use this key. If your Ecological Services Field Office agrees that impacts to listed species that are outside federal jurisdiction will be addressed through a separate process, you can answer yes to this question and continue through the key.

   Yes

5. Are you the lead federal action agency or designated non-federal representative requesting concurrence on behalf of the lead Federal Action Agency?

   Yes

6. Is the project being funded, lead, or managed in whole or in part by U.S. Fish and Wildlife Restoration and Recovery Program (e.g., Partners, Coastal, Fisheries, Wildlife and Sport Fish Restoration, Refuges)?

   No

7. Will the proposed project involve demolition, rehabilitation, property elevation, renovation, and/or rebuilding of one or more existing buildings (e.g., residential, commercial and industrial buildings, or utilities)? Note: if project activities include modification of bridges and/or culverts, answer this question "No".

   No

8. Will the proposed project result in permanent changes to water availability or water quality where bats may be present?

   No

9. Does any component of the project associated with this action include activities or structures that may pose a collision risk to bats (e.g., plane-based surveys, land-based or offshore wind turbines)?

   No

10. Are there any caves, mines or mine features that are suitable for hibernating Indiana bats within the action area?

    No

11. Has a presence/probable absence bat survey (acoustic or mist-net summer active season survey) following the Service's Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines been conducted within the action area? Note: If yes, upload survey report.

    No

12. Does the project involve removal or modification of a human-made structure (barn, house, or other building) known or suspected to contain roosting bats?
    Note: Most maintenance and general human disturbance in and around structures will not affect Indiana bats as bats roosting in human structures are adjusted to a certain level of routine noise and are generally expected to roost away from areas with excessive disturbance. Answer 'no' if the proposed action will not include disturbance to human structures known or suspected to contain roosting bats or if the structure does not offer suitable roosting habitat for Indiana bats. If unsure, answer 'yes.'

    No

13. Does the project include removal/modification of an existing culvert?

    No

14. Does the project include removal/modification of an existing bridge?

    No

15. Are trees present within 1000 feet of the action area?

    Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats (i.e., live trees and/or snags ≥5 inches dbh (12.7 centimeter), answer "Yes". If unsure, answer “Yes.” Or refer to the USFWS' Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines for definitions and an assessment form that will assist you in determining if suitable habitat is present within your project's action area. Suitable summer habitat for Indiana bat consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥5 inches dbh (12.7 centimeter) that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat

    Yes

16. Will the project include tree cutting or other means of knocking down or bringing down trees, or tree trimming?

    Yes

17. Is the project related to the production of coal, including projects that support the mining of coal, as well as the production and/or distribution of energy produced from coal?

    No

18. Does the project include emergency cutting or trimming of hazard trees in order to remove an imminent threat to human safety or property?

    No

19. Will the project cause trees to be knocked down, or otherwise brought down across an area greater than 1 acre in total extent?

    No

20. Will any tree cutting/trimming or other knocking or bringing down of trees occur between April 1 and September 30?

    No

21. Will the project be associated with a timber harvest or timber sale for management or thinning purposes (not including clear cut), including skid trails, roads, landings and/or stream crossings?

    No

22. Will the project result in the use of prescribed fire?

    No

23. Will the proposed project involve the use or storage of herbicide?

    No

24. Will the proposed project involve blasting in areas where Indiana bats may be present?

    No

25. Will the action involve military training that could impact Indiana bats (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter use at night, UAS use at night, or fixed wing aircraft use at night)?

    No

26. Does the project include temporary or permanent lighting of roadway(s), facility(ies), and/or parking lot(s)?

    Yes

27. When installing new or replacing existing permanent lights, will downward-facing, full cut-off lens lights (with same intensity or less for replacement lighting) be used?

    Yes

28. Will temporary lighting be directed away from suitable Indiana bat habitat during the active season?

    Yes

29. Do you have any other documents that you want to include with this submission?

    No

IPAC USER CONTACT INFORMATION

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LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Park Service
Name: Thomas Bonetti
Email: thomas.bonetti@dot.gov
Phone: 4135440621

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pennsylvania Ecological Services Field Office
110 Radnor Road Suite 101
State College, PA 16801-7987
Phone: (814) 298-4396

In Reply Refer To: 08/11/2026 15:21:15 UTC
Project code: 2026-0130146
Project Name: Gettysburg NMP and Eisenhower NHS Trails Plan EA

Federal Nexus: yes
Federal Action Agency (if applicable): National Park Service

Subject: Federal agency coordination under the Endangered Species Act, Section 7 for 'Gettysburg NMP and Eisenhower NHS Trails Plan EA'

Dear Thomas Bonetti:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on August 11, 2026, for "Gettysburg NMP and Eisenhower NHS Trails Plan EA" (here forward, Project). This project has been assigned Project Code 2026-0130146 and all future correspondence should clearly reference this number.

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into the IPaC must accurately represent the full scope and details of the Project. Failure to accurately represent or implement the Project as detailed in IPaC or the Northeast Determination Key (DKey), invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

The IPaC results indicated the following species is (are) potentially present in your project area and, based on your responses to the Service's Northeast DKey, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Green floater (*Lasmigona subviridis*)	Proposed Threatened	No effect

Virginia big-eared bat (*Corynorhinus (=Plecotus) townsendii virginianus*)	Endangered	No effect

Conclusion

If there are no updates on listed species, no further consultation/coordination for this project is required for the species identified above.

However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project implements any changes which are final or commits additional resources.

Other Species and Critical Habitat that May be Present in the Action Area

In addition to the species listed above, the following species and/or critical habitats may also occur in your project area and are not covered by this conclusion:

- Indiana bat *Myotis sodalis* Endangered
- Monarch butterfly *Danaus plexippus* Proposed Threatened
- Northern Long-Eared Bat *Myotis septentrionalis* Endangered
- Tricolored bat *Perimyotis subflavus* Proposed Endangered

Please Note: If the Action may impact bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act (BGEPA) (54 Stat. 250, as amended, 16 U.S.C. 668a-d) by the prospective permittee may be required. Please contact the Migratory Birds Permit Office, (413) 253-8643, or PermitsR5MB@fws.gov, with any questions regarding potential impacts to Eagles.

If you have any questions regarding this letter or need further assistance, please contact the Pennsylvania Ecological Services Field Office and reference the Project Code associated with this Project.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

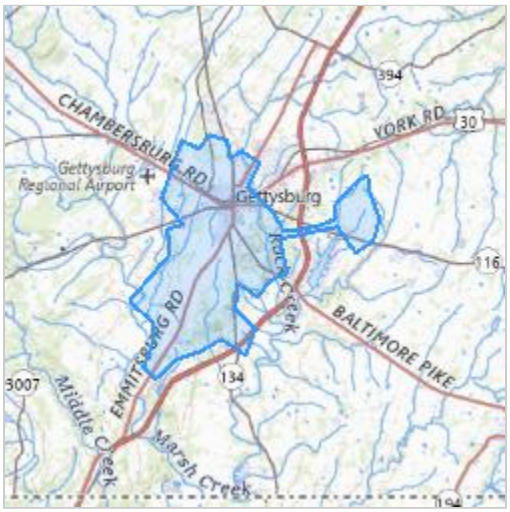
Gettysburg NMP and Eisenhower NHS Trails Plan EA

2. Description

The following description was provided for the project 'Gettysburg NMP and Eisenhower NHS Trails Plan EA':

> The National Park Service (NPS) seeks to improve visitor access to the parks' interpretive sites, and connections between the two parks by integrating existing trails with new trail alignments to create a network of trails that reduce reliance on vehicles while minimizing impacts to the battlefield, natural resources, and commemorative-era landscapes. NPS would adopt a Comprehensive Trails Plan for Gettysburg NMP and Eisenhower NHS, which would occur over a 10- to 15-year period. During this phased buildout, operational responsibilities would be managed through a structured approach that assigns and updates roles as new trails come online, ensuring that each phase is supported by appropriate oversight and resources. The Trails Plan includes constructing new multi-use and pedestrian trails, rerouting existing equestrian trails, and adding interpretive trailheads. The Trails Plan would also eliminate social trails and close specific park avenues to increase safety and connectivity.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.8086678,-77.23587891639893,14z



QUALIFICATION INTERVIEW

1. As a representative of this project, do you agree that all items submitted represent the complete scope of the project details and you will answer questions truthfully?

   Yes

2. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed species that is not covered by an existing section 10 (a)(1)(A) Recovery Permit, exempted under section 4(d) or authorized by a section 6 cooperative agreement? **Note:** This question could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered, or proposed species.

   No

3. Is the action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

   Note: for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer ‘yes’ to this question.

   Yes

4. Are you including in this analysis all impacts to federally listed species that may result from the entirety of the project (not just the activities under federal jurisdiction)?

   Note: If there are project activities that will impact listed species that are considered to be outside of the jurisdiction of the federal action agency submitting this key, contact your local Ecological Services Field Office to determine whether it is appropriate to use this key. If your Ecological Services Field Office agrees that impacts to listed species that are outside the federal action agency's jurisdiction will be addressed through a separate process, you can answer yes to this question and continue through the key.

   Yes

5. Are you the lead federal action agency or designated non-federal representative requesting concurrence on behalf of the lead Federal Action Agency?

   Yes

6. Is the lead federal action agency the Natural Resources Conservation Service?

   No

7. Will the proposed project involve the use or storage of herbicide?

   No

8. Will the proposed project involve herbaceous native vegetation removal (including prescribed fire that would result in burning of plants) or mowing?

   No

9. Will the proposed project result in **permanent** changes to surface water or groundwater quantity, retention, quality or timing? For example, will the proposed project include any activities that would alter stream flow, surface water or groundwater such as water withdrawal, water recharge, wells, infiltration effects, stormwater outlets, hydropower energy production, impoundments, intake structures, water or stream diversion structures, mining, impoundments, dams, surface water drainage, and/or turbines? Projects that include temporary and limited water reductions that will not displace listed species or appreciably change water availability for listed species (e.g. listed species will experience no changes to feeding, breeding or sheltering) can answer "No". Note: This question refers only to the amount of water present in a stream, other water quality factors, including sedimentation and turbidity, will be addressed in following questions.

   No

10. Does the project include activity in or within 300 feet of a freshwater wetland? This includes, for example, project activities within wetlands, project activities within 300 feet of wetlands that may have impacts on wetlands, water withdrawals and/or discharge of contaminants (even with a NPDES). Activities include, but are not limited to wetland draining, ditching, tilling, filling, excavation, stream diversion, impoundments, mowing, grazing of vegetation, access roads, detention basins, water or sewer lines, irrigation, increase in impervious surfaces, and application of pesticides, deicing agents, or fertilizers.

    Yes

11. Does any component of the project associated with this action include activities or structures that may pose a collision risk to **birds** (e.g., plane-based surveys, land-based or offshore wind turbines, new or enlarged communication towers or broadcast towers, high voltage transmission lines, any type of towers with or without guy wires)?

    No

12. Will the proposed project involve demolition, rehabilitation, property elevation, renovation, and/or rebuilding of one or more existing buildings (e.g., residential, commercial and industrial buildings, or utilities)? Note: if project activities include modification of bridges and/or culverts, answer this question "No".

    No

13. Does the project area intersect the boundary of Virginia Ecological Services Field Office?

    Automatically answered
    No

14. Does the project area intersect the boundary of the Chesapeake Bay Ecological Services Field Office?

    Automatically answered
    No

15. Will the proposed project involve earth moving or other ground disturbance that could cause erosion and sedimentation, and/or contamination within 300 feet of a freshwater wetland or along a stream?

    Note: Answer "Yes" to this question if erosion and sediment control measures will be used.

    Yes

16. Will the proposed project impact streams or tributaries of streams where aquatic listed species may be present through activities such as, but not limited to, valley fills, large-scale vegetation removal that could result in ground destabilization, and/or change in site topography?

    No

17. Will the proposed project involve vegetation removal within 300 feet of a perennial stream bank where aquatic listed species may be present?

    Yes

18. Will erosion and sedimentation control Best Management Practices (BMPs) associated with applicable state and/or Federal permits, be applied to the project?

    Note: If BMPs have been provided by and/or coordinated with and approved by the appropriate Ecological Services Field Office, answer "Yes" to this question.

    Yes

19. Is the project being funded, lead, or managed in whole or in part by U.S Fish and Wildlife Restoration and Recovery Program (e.g., Partners, Coastal, Fisheries and Aquatic Conservation, Office of Conservation Investment, Refuges)?

    No

20. [Hidden Semantic] Does the project intersect WV?

    Automatically answered
    No

21. Does any component of the project associated with this action include activities or structures that may pose a collision risk to **bats** (e.g., plane-based surveys, land-based or offshore wind turbines)?

    No

22. Is the project an aquatic restoration project being funded, lead, or managed in whole or in part by U.S. Fish and Wildlife Restoration and Recovery Program (e.g., Partners, Coastal, Fisheries, Wildlife and Sport Fish Restoration, Refuges)?

    No

23. Will the proposed project result in permanent changes to water availability or water quality where **bats** may be present?

    No

24. Will the proposed project involve blasting where bats may be present?

    No

25. Will the proposed project involve earth moving or ground disturbance that could cause erosion, sedimentation, and/or contamination within waterbodies potentially used by bats?
    Note: Answer yes if erosion and sediment control measures will be used.

    No

26. Will erosion and sedimentation control Best Management Practices (BMPs) associated with applicable state and/or federal permits be applied to the project? If BMPs have been provided by and/or coordinated with and approved by the appropriate Ecological Services Field Office, answer "Yes" to this question.

    Yes

27. [Semantic] Does the project intersect the Virginia Big-eared Bat species list area?

    Automatically answered
    Yes

28. Will Virginia big-eared bats or big-eared bat habitat (e.g., caves, bridges, culverts, rock fissures, or anthropogenic structures used for roosting or foraging areas) have any possible exposure to any of the project activities during any time of year?

    No

29. Do you have any other documents that you want to include with this submission?

    No

PROJECT QUESTIONNAIRE

1. Approximately how many acres of trees would the proposed project remove?

   0

2. Approximately how many total acres of disturbance are within the disturbance/ construction limits of the proposed project?

   12.6

3. Briefly describe the habitat within the construction/disturbance limits of the project site.

   The habitat is primarily open fields, field edges, and grassland habitat. Gettysburg NMP is actively transitioning portions of agricultural lands into warm season grasses to encourage a more diverse plant community for open-upland bird species. Much of Gettysburg NMP and Eisenhower NHS are grassland habitat.

IPAC USER CONTACT INFORMATION

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LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Park Service
Name: Thomas Bonetti
Email: thomas.bonetti@dot.gov
Phone: 4135440621

Department of Environmental Protection
Pennsylvania Natural Diversity Inventory

Scientific Name	Common Name	State Status
Arethusa bulbosa	Dragon's Mouth	Endangered
Asclepias verticillata	Whorled Milkweed	Threatened
Asio flammeus	Short-eared Owl	Endangered
Asplenium pinnatifidum	Lobed Spleenwort	Rare
Bartonia paniculata ssp. paniculata	Screw-Stem	Rare
Bartramia longicauda	Upland Sandpiper	Endangered
Botaurus lentiginosus	American Bittern	Endangered
Bromus kalmii	Kalm's Brome	Threatened
Carex bullata	Bull Sedge	Endangered
Carex buxbaumii	Brown Sedge	Rare
Carex tetanica	A Sedge	Threatened
Chionanthus virginicus	Fringe-tree	Under review for listing
Cirsium horridulum	Horrible Thistle	Endangered
Crocanthemum bicknellii	Bicknell's Hoary Rockrose	Endangered
Cryptotis parva	North American Least Shrew	Endangered
Dicentra eximia	Wild Bleeding-hearts	Endangered
Dichanthelium oligosanthes var. scribnerianum	Scribner's Panicgrass	Under review for listing
Eurybia radula	Rough-leaved Aster	Under review for listing
Glyptemys muhlenbergii	Bog Turtle	Endangered
Iris verna var. smalliana	Dwarf Iris	Endangered
Juncus biflorus	Grass-leaved Rush	Rare
Juncus brachycarpus	Short-fruited Rush	Endangered
Lanius ludovicianus migrans	Migrant Loggerhead Shrike	Endangered
Lepomis gulosus	Warmouth	Endangered
Lithospermum canescens	Hoary Puccoon	Under review for listing
Lorinseria areolata	Netted Chainfern	Rare
Lupinus perennis	Lupine	Rare
Lycopodiella appressa	Southern Bog Clubmoss	Threatened
Lythrum alatum	Winged Loosestrife	Endangered
Magnolia virginiana	Sweet Bay Magnolia	Threatened
Melanthium virginicum	Virginia Bunchflower	Under review for listing
Morus rubra	Red Mulberry	Under review for listing
Myotis leibii	Eastern Small-footed Bat	Threatened
Myotis lucifugus	Little Brown Bat	Endangered
Myotis septentrionalis	Northern Long-eared Bat	Endangered
Myotis sodalis	Indiana Bat	Endangered
Nabalus serpentaria	Lion's-foot	Under review for listing
Neotoma magister	Allegheny Woodrat	Threatened
Neottia smallii	Kidney-leaved Twayblade	Endangered

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Opuntia humifusa	Prickly-pear Cactus	Rare
Packera anonyma	Plain Ragwort	Rare
Perimyotis subflavus	Tricolored Bat	Endangered
Phaseolus polystachios	Wild Kidney Bean	Under review for listing
Pinus echinata	Short-leaf Pine	Under review for listing
Platanthera ciliaris	Yellow-fringed Orchid	Threatened
Pseudemys rubriventris	Northern Red-bellied Cooter	Threatened
Pseudotriton montanus montanus	Eastern Mud Salamander	Endangered
Pyrola chlorantha		Under review for listing
Quercus shumardii	Shumard Oak	Endangered
Ranunculus fascicularis	Tufted Buttercup	Endangered
Ranunculus pusillus	Spearwort	Under review for listing
Rotala ramosior	Tooth-cup	Rare
Rudbeckia fulgida	Eastern Coneflower	Under review for listing
Scaphiopus holbrookii	Eastern Spadefoot	Threatened
Scirpus ancistrochaetus	Northeastern Bulrush	Endangered
Solidago speciosa	Showy Goldenrod	Under review for listing
Sparganium androcladum	Branching Bur-reed	Endangered
Spiza americana	Dickcissel	Endangered
Trillium cernuum	Nodding Trillium	Under review for listing