



Perry's Victory and International Peace Memorial

Cultural Landscape Treatment Plan and Environmental Assessment

November 2018



Cultural Resources
Midwest Region

Perry's Victory and International Peace Memorial

Put-In-Bay, Ohio

Cultural Landscape Treatment Plan and Environmental Assessment

Prepared by:

Commonwealth Heritage Group
300 West Main Street, Suite 201
Charlottesville, Virginia 22903
(434) 979-1617

Period Architecture
911 Barret Avenue
Louisville, Kentucky 40204
(502) 216-7651

Prepared for:

National Park Service
Midwest Regional Office
601 Riverfront Dr.
Omaha, Nebraska 68102
(402) 661-1601

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**Cultural Resources Division
Midwest Regional Office
National Park Service
601 Riverfront Drive
Omaha, Nebraska 68102
(402) 661-1601**

About the front cover: View toward the Perry's Victory Memorial obelisk from the intersection of Toledo Avenue and Delaware Avenue. October 2016.

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National Park Service
U.S. Department of the Interior



Perry's Victory and International Peace Memorial
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FINDING OF NO SIGNIFICANT IMPACT

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INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) has prepared an Environmental Assessment (EA) for the purpose of satisfying the compliance requirements for the implementation of the Perry's Victory and International Peace Memorial *Cultural Landscape Treatment Plan* (CLTP). The EA documents the results of the potential environmental impacts associated with implementation of the CLTP treatment recommendations.

As stated in the Final CLTP/EA, the proposed action would implement the CLR recommendations, provide a vision and clear direction for the protection of the park's cultural resources, and preserve the overall historic character of Perry's Victory and International Peace Memorial. This Finding of No Significant Impact (FONSI) describes the alternative the NPS has selected for implementation, provides the rationale for its selection, and explains why it will not result in significant impacts. Measures to mitigate adverse effects from implementation of project actions are presented in Attachment A of this document and a non-impairment determination is included in Attachment B. Brief descriptions of each alternative are provided below.

BACKGROUND

Perry's Victory and International Peace Memorial consists of a 352-foot high column on South Bass Island in Lake Erie surrounded by 25 acres of landscaped grounds. The Memorial was built to commemorate Commodore Oliver H. Perry's victory against the British on September 10, 1813. It is approximately eight miles northeast of Port Clinton, Ohio. Visible for miles, it stands as a reminder not only of the events of the War of 1812, but also as a symbol of international peace between Great Britain, Canada, and the United States. The Memorial was built by a nine-state commission with matching federal funds between 1912 and 1915. Twenty-one years after it was built, Congress charged the NPS to preserve and manage the Memorial. Management of this site was transferred to the NPS on July 6, 1936.

PURPOSE, NEED, AND OBJECTIVES

The purpose of the proposed action is to help fulfill the mandate of protection and management of fundamental park resources and values including the cultural landscape and features present at the time of construction of the Memorial column and structures and the designed historic landscape. Implementing treatment recommendations will provide a peaceful setting to promote stronger understanding of the battle of Lake Erie in 1813 and its resultant lessons of international peace. Proposed changes will also preserve the Memorial and its designed historic landscape while guiding rehabilitation for enhancing the visitor experience and enjoyment of the site through integration of interpretation with the cultural landscape. Proposed changes will provide Architectural Barriers Act Accessibility Standards (ABAAS) to indoor/outdoor experiences that coincide with the enhanced stewardship of the park's significant cultural and natural resources. The project is needed to provide a richer and more complete visitor experience of the park through access to the cultural landscape and associated interpretation and to provide additional opportunities for expanded programming integrated within the landscape.

The project is needed to accomplish the following objectives:

- Preservation of the monument and its designed landscape as fundamental resources and values of the park;
- Preservation of the horizontality of the landscape setting, supported by open lawn, upper and lower plazas, and expanses of water surrounding the park – all working together to accentuate the vertical column;
- Integration of architecture and the landscape with plazas; seawalls, sidewalks, and circulation reflecting traditional Beaux Arts style;
- Preservation of historic viewsheds to and from the Memorial; views from a distance while approaching South Bass Island by boat; views of the grounds and Memorial from the eastern end of Gibraltar Island; views of the column within the historic core; and views from the column to the site of the 1813 Battle of Lake Erie;
- Development of specific opportunities for engagement through interaction with-and interpretation of-both cultural and natural landscape features and implementation of accessibility standards for the Memorial plazas, the visitor center, and the pedestrian circulation system;
- Establishment of compatible spatial transitions between the surrounding community and the Memorial. Provision for guidance in managing viewshed and spatial definitions and the character of gradual or defined perimeters between the park and adjacent neighborhoods;
- Integration of sidewalks connecting the designed landscape to the surrounding community;
- Coordination of the plaza and column rehabilitation projects with vegetation replacement in the vicinity of the existing Austrian pines.
- Application of a consistent and intentional approach to design and maintenance to avoid inconsistent application of materials and techniques.

SELECTED ALTERNATIVE

The NPS alternative selected for implementation is Alternative 3: Implementation within a framework of rehabilitation that will preserve significant characteristics of the historic landscape while adapting the site to meet contemporary visitor needs and park management objectives. Significant characteristics include horizontality of the landscape setting accentuating the vertical column; definition of the boundary edges of the historic core with tree masses; integration of architecture and landscape typical of Beaux Arts style plazas, sidewalks, and circulation; and preservation of viewsheds to and from the Memorial.

The selected alternative will retain the designed historic landscape originating in the traditional Beaux Arts style of formal and symmetrical relationships of architecture and the landscape. The relationship of architecture and the landscape will be preserved with a pattern of rectilinear sidewalks near the Memorial reinforcing the contrast of the

horizontal landscape with the vertical column. In order to preserve this relationship, a circulation framework will include existing and proposed sidewalk connections throughout the park. Symmetry around the Memorial will be preserved and enhanced by new sidewalks and the horizontal expanse of the open lawn landscape. Additional new sidewalks will border the edge of the historic core and provide visitors with a more informal connection from the historic core to park features and areas east and west of the Memorial.

Major goals of the park will be addressed by the selected action, including providing barrier free access to the upper and lower plazas, across the pedestrian circulation system, and into all buildings except the Memorial column; establishing a formal and welcoming entrance to the park through the Peace Garden; erecting a black powder magazine and buffer in compliance with regulations; and allowing connections and access to the Memorial and integration of the entire park into the visitor experience.

RANGE OF ALTERNATIVES CONSIDERED

In addition to the selected alternative described above, the EA analyzed a no action alternative (Alternative 1) and one additional action alternative (Alternative 2).

Under Alternative 1, management of the entire park would continue in accordance with NPS policies and standards. Within this alternative current management strategies would remain the same and there would be no addition of facilities, improvements for visitor accommodation and accessibility, or expanded interpretation in association with the cultural landscape. The focus would be on preservation of the existing character of the park and current interpretive methods and programming. Challenges would remain relating to the preservation of existing conditions and continued management strategies. No clear sense of entry and orientation as visitors arrive at the park would be developed. The visitor center precinct and the pedestrian circulation system would retain limited compliance with accessibility standards. The current black powder magazine would remain in close proximity to occupied buildings, a condition not in compliance with regulations governing the storage of black powder. Historic spatial patterns defined by large deciduous tree masses would remain diminished within current vegetation management strategies, and pedestrian circulation would remain without connection from the cultural landscape to the surrounding community and a clear area of entrance and orientation to and through the visitor center.

Alternative 1 was not selected because it would preclude the park from meeting many of the goals of the Purpose and Need statement and from resolving the list of management issues. No further explorations of ways to utilize the cultural landscape as a tool for interpreting the Battle of Lake Erie and the construction of the Memorial in 1915 would be conducted. This alternative would limit the park in its ability to accomplish design and management objectives associated with development of a new entrance to the park through the Peace Garden and a clear connection to and through the visitor center and to the historic core of the site.

Under Alternative 2, the designed historic landscape continues the Beaux Arts tradition of a formally integrated architecture and landscape and is preserved through introduction of a curvilinear pedestrian circulation system. The curvilinear framework would retain the contrast of the horizontal landscape with the vertical column of the Memorial and introduce a strong symmetrical pattern around the Memorial. The circulation system would not retain any existing sidewalks except along the south seawall. Alternative 2 shares several commonalities in approach to the selected alternative to ensure preservation of significant characteristics of the historic landscape while adapting the site to meet contemporary needs and park management objectives. Consensus within park staff was that the curvilinear approach removed too much of the existing circulation system and would have a negative effect on the designed historic landscape. Alternative 2 would not fulfill the park's management goals for preservation of cultural resources and protection of natural resources.

The Ohio SHPO conveyed the following concerning Alternative 2 in their letter dated May 15, 2018: "We do not support the curvilinear paths approach in Alternative 2, as it does not fall within the original design intent of the Freedlander plans. We do support the addition of paths and walkways that were part of the original plan, but never executed, as proposed in the selected alternative." Based on SHPO comments, public comments, and park concerns, Alternative 2 was not put forward as the selected alternative as it was not the best plan to accomplish the priority goals and management objectives of the park.

MITIGATION MEASURES AND BEST MANAGEMENT PRACTICES (BMPs)

The NPS and/or its contractors will implement mitigation measures and best management practices (BMPs) to minimize the degree and/or severity of adverse effects on natural resources, historic structures; cultural landscapes; historic viewsheds, visitor use and experience and human, health and safety. The NPS may add mitigation measures and BMPs to this list in the future. Mitigation measures and BMPs are attached in this FONSI (Attachment A).

SIGNIFICANCE CRITERIA REVIEW

This section explains why the selected alternative will not have a significant effect on the quality of the human environment. As defined in 40CFR 1508.27, significance is determined by examining the following criteria:

1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

Whether taken individually or as a whole, the impacts of the selected alternative do not reach the level of significant adverse effects that would require preparation of an EIS. Most adverse impacts associated with implementation of the selected alternative will be short-term and temporary during construction activities, vegetation removal, insertion of new plantings, and vegetation management strategies. Mitigations and BMPs are incorporated into the proposed project to ensure further reduction and minimization of adverse impacts.

When the impacts of the selected alternative are combined with other past, present, and reasonably foreseeable future actions in the project area, the overall impacts to cultural and natural resources within the park will be minor in the short-term and beneficial in the long-term. Known archeological resources will be protected within ongoing policies and processes maintained by the park for protection of cultural resources. Historic buildings and structures will be maintained and managed to retain their historical character. Expanded interpretation proposed within the selected alternative will incorporate additional maintenance to building and structure sites. The designed historic landscape will benefit from vegetation management and expanded interpretation that integrates the cultural landscape into the interpretive story of the Memorial and the Battle of Lake Erie.

There will be a number of disruptions to surface soils due to construction and grading within the selected alternative. Most impacts are associated with specific areas of the park and will typically be short-term and limited to the time of project completion. Mitigation measures and BMPs will ensure negligible impacts to soils and geology. Long-term positive impacts to soils will be expected due to vegetation management techniques for soil stabilization, and design of pedestrian circulation to avoid steep grades and minimization of ongoing soil erosion.

There will be short-term minor adverse impacts to water resources with the implementation of the selected alternative. Short-term impacts will be mitigated through planning and scheduling all construction activities to prevent erosion and sedimentation. Construction will not have a measurable effect on the frequency, elevation, intensity or duration of floods, but the function of the floodplain including some flood storage will be diminished due to temporary removal of grass cover or vegetation during construction. Proposed modification of the landscaped area in the 100-year floodplain

of the park will not impact land critical to the productivity of a floodplain ecosystem. The historic core and other management zones of the park were excavated and filled due to construction of circulation systems and facilities. The historic core was filled repeatedly since construction of the Memorial in 1915. Therefore, construction activity within the selected alternative will result in short-term minor adverse impacts to surface water and floodplains.

There will be long-term beneficial impacts on vegetation within the selected alternative. The majority of existing trees will remain in the park and additions of numerous trees east and west of the historic core will preserve the historic spatial organization of the site. Significant introduction of plant material will be part of the proposed Peace Garden within the selected alternative. Vegetation will include deciduous shade trees, shrubs, and perennial flowers and grasses. Vegetation will improve and expand wildlife habitat specifically for the Monarch butterfly, Indiana bat, and Kirtland's warbler, all federally protected species. There will be short-term adverse impacts to turf grass and a small number of trees, due to project construction and selected demolition of existing segments of the sidewalk. Mitigation measures for vegetation and turf protection will be implemented to ensure any short-term adverse impacts will not become long-term adverse impacts.

2. The degree to which the proposed action affects public safety and health.

The selected alternative will have beneficial impacts on visitor use, experience, and safety due to increased interpretive opportunities and features, improved and expanded education and communication, construction of new sidewalks and contemplative nodes for resting and enjoying views over the water, additional parking for both cars and golf carts, and implementation of accessibility standards over the entire site. This will include barrier free access for all visitors to both memorial plazas and to interpretive programming.

3. Unique characteristics of the geographic area such as proximity to historic and cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:

As described in the CLTP/EA, the selected alternative will not affect wild and scenic rivers, ecologically critical areas or prime agricultural land because those resources do not exist at Perry's Victory and International Peace Memorial. The park will continue to identify potential historic properties in the community surrounding the park proposed for ground disturbance, demolition of historic buildings, or removal of significant vegetation.

4. Degree to which effects on the quality of the human environment are likely to be highly controversial.

The selected alternative is not highly controversial. No issues arose during public scoping or the preparation of the CLTP/EA. No issues were brought to the park's attention during the public review period that indicated a dispute with either the methods or results of the environmental analysis.

5. Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:

No highly uncertain, unique, or unknown risks were identified during the preparation of the CLTP/EA or the public review period.

6. Degree to which the selected alternative may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The selected alternative will not establish a precedent for future actions with significant effects. In addition, the action will not represent a decision in principle about a future consideration with the potential for significant effects.

7. Whether the selected alternative is related to other actions with individually insignificant but cumulatively significant impacts.

No significant adverse cumulative impacts were identified in the CLTP/EA. Likely future actions taken individually or collectively will result in no significant adverse impact on the human or natural environment due to phasing of projects

and implementation of mitigation measures during and after construction. Within some of the proposed actions, the incremental impact will be long-term and positive due to enhancement of the visitor experience, accessibility for all visitors, vegetation management strategies and mitigation, and preservation of the Memorial buildings, structures, and landscape. The incremental impact of the selected alternative when added to other past, present and reasonably foreseeable future actions will not be significant.

8. Degree to which the selected alternative may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

Effects of the selected alternative on cultural landscapes, historic buildings and structures, archeology, and historic viewsheds are long-term and beneficial. Benefits to the cultural landscape will be the reasonable balance achieved between the objectives for integration of the cultural landscape into the interpretive story and ongoing management objectives. The selected alternative will respect and enhance the landscape and setting of the Memorial and grounds and afford visitors opportunities for expanded interpretation through integration with the cultural landscape. Benefits to historic buildings and structures will be ensured through continued preservation, management and maintenance of their historical character. A high priority within the selected alternative is the provision of accessibility standards throughout the park, including barrier free access to the Memorial lower plaza and from the lower plaza to the upper plaza. Alteration of the stairway for accessibility may slightly diminish the overall integrity of this feature but will not jeopardize the historical integrity of the Memorial structure and designed landscape to the extent that it will lose its current listing in the National Register.

Existing historical viewsheds will be maintained and others opened up, providing visual associations with the cultural landscape. All improvements will be designed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, reducing the potential for adverse impacts on the historic setting. According to the National Register Nomination update (2014) for Perry's Victory and International Peace Memorial, there are no significant archeological sites associated with the historic grounds or within areas outside the historic grounds that may be disturbed by actions proposed within the selected alternative. Any future potential impacts to archeological resources will be evaluated through discussion and involvement of NPS archeologists at the Midwest Archeological Center.

The park initiated consultation with Ohio History Connection /Office of the State Historic Preservation Officer (SHPO) with a scoping letter sent on January 19, 2017. The Architecture Reviews Manager was invited to the public meetings held at the park on May 17, 2017 and on October 25, 2017. The SHPO office also received a copy of the Public Review draft of the CLTP/EA for review and comment during the public review period from March 23 – April 24, 2018. The park received a letter from the Architecture Reviews Manager dated May 15, 2018 with a list of comments concerning the project. NPS and park staff provided a response to comments in a letter dated June 5, 2018 and requested a teleconference for discussion of SHPO concerns. The teleconference on July 18, 2018 resulted in verbal concurrence on the issues presented by the SHPO. In a letter dated September 19, 2018, the Office of the SHPO formally agreed with the NPS determination that the selected alternative from the CLTP/EA is not likely to have adverse effects on the historic memorial and its designed landscape. Further consultation with the SHPO will occur to examine specific details, as the stair repair and accessibility project moves forward.

9. Degree to which the selected alternative may adversely affect an endangered or threatened species or its critical habitat.

With mitigation measures requested by the USFWS in place, the NPS has determined that the selected alternative will have no adverse effect on threatened or endangered species. In accordance with Section 7 of the Endangered Species Act, the park initiated consultation with the (USFWS) on January 19, 2017. In response to the initial consultation letter,

the USFWS identified the following species of concern for the project area: monarch butterfly (*Danaus plexippus plexippus*) currently under status review; Indiana bat (*Myotis sodalists*) federally endangered; northern long-eared bat (*Myotis septentrionalis*) federally threatened; Lake Erie water snake (*Nerodia sipedon insularum*) state endangered species and a Federal species of concern; and Kirtland's warbler (*Setophaga kirtlandii*) a federally listed endangered species. Mitigation measures were provided and incorporated in the public review draft of the CLTP/EA. The Ohio Department of Natural Resources (ODNR) received a copy of the Public Review Draft of the EA for review and comment. In a letter dated May 3, 2018, the ODNR presented comments generated by an inter-disciplinary review within the Department. The comments were prepared under the authority of the Fish and Wildlife Coordination Act (48 STAT. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. Species of concern to the agency for the project area were narrowed down to the Indiana bat, the Lake Erie water snake, and Kirtland's warbler. Mitigation measures outlined by USFWS were incorporated into the final document and in the site-wide mitigation measures for the CLTP/EA. Monitoring will be conducted by an individual trained to identify Lake Erie water snakes. Vegetation species proposed in the selected alternative were provided by USFWS for potential expanded and improved habitat for federal endangered species within the range of Perry's Victory and International Peace Memorial. Implementation of designated vegetation plantings will have long-term positive impacts for rare, threatened, and endangered species.

10. Whether the selected alternative threatens a violation of federal, state, or local environmental protection law.
The selected alternative will not violate federal, state, or local environmental protection laws.

Public Involvement

Park staff at Perry's Victory and International Peace Memorial and resource professionals of the National Park Service Midwest Regional Office conducted internal scoping for the (CLTP/EA) and identified potential stakeholders with interest in the project. This interdisciplinary process defined the purpose and need, identified potential actions to address the need, determined the likely issues and impact topics, and identified the relationship of the proposed action to other planning efforts at the park. For the CLTP/EA, a kick-off planning and scoping meeting was held on October 4–7, 2016 to begin work on the project, initiate a strategy for public involvement throughout the process, and introduce the project to residents of South Bass Island, park staff, and interested stakeholders. This introductory planning and scoping meeting was held on October 6, 2016. Goals and objectives of the project were discussed and participants expressed various concerns in association with potential effects on natural resources, wildlife, and the condition of the Village swimming beach adjacent to the south seawall. An additional planning workshop with park staff and the planning team was held on May 16-17, 2017, to review progress on the development of alternative design concept plans. A news release was issued from the staff at Perry's Victory and International Peace Memorial inviting the public to attend the open house on May 17, 2017 and provide input in the early development of the alternatives and the subsequent EA process. The public had an additional avenue of participation through a public open house on October 25, 2017. This meeting gave stakeholders and staff an opportunity to see developed concept design alternatives. Comments and suggestions were incorporated into the draft CLTP/EA based on public input. The final draft of the CLTP/EA went to public review for 30 days, March 23 – April 24, 2018 and was uploaded on the NPS Planning, Environment, and Public Comment (PEPC) system website. Hardcopies of the draft document were sent to appropriate agencies for review and letters were sent to stakeholders, informing them of the review period and the methods available to them to respond to the document. Comments were collected from the PEPC site, emails, and submitted letters during the 30-day review period. Comments and questions were documented in the Public Review Analysis and taken into consideration as the CLTP/EA was finalized. Agency review letters were received from Ohio History Connection, Department of Resource Protection and Review and Ohio Department of Natural Resources, Division of Wildlife and Division of Water Resources. These letters of response and comments are included in the appendix of the CLTP/EA.

Conclusion

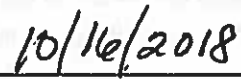
Based on the review of the facts and analysis contained in the EA, the NPS has selected alternative 3, which will enhance the connection of the landscape to interpretive themes, the historic setting of the site, visitor experience, and human health and safety, while preserving, protecting, and managing the cultural and natural resources of the park. The selected alternative will not have a significant impact either by itself or in consideration of cumulative impacts. Accordingly, the requirements of NEPA, regulations promulgated by the CEQ, regulations promulgated by the Department of the Interior, and provisions of Director's Order 12 and the 2015 National Park Service NEPA Handbook have been fulfilled.

It is my determination that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with NEPA and CEQ regulations (40 CFR 1508 et. seq.), an environmental impact statement is not required and will not be prepared for implementation of the selected alternative.

Recommended:



Barbara Fearon
Superintendent
Perry's Victory and International Peace Memorial



Date

Approved:


Craig Kenkel
Acting Regional Director, Midwest Region

Date

ATTACHMENT A

MITIGATION MEASURES AND BEST MANAGEMENT PRACTICES (BMPs)

The National Park Service (NPS) places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. The NPS will implement an appropriate level of monitoring throughout the construction and maintenance process within the park to help ensure that protective measures are being properly implemented and are achieving their intended results. These mitigation measures are applicable for contractors and park staff. The PEVI staff and contractors will strive to maximize sustainable designs and management strategies to minimize potential adverse effects to cultural and natural resources. It is intended that the past and ongoing monitoring and mitigation measures will continue with implementation of the NPS-selected alternative and supplemented by those actions labeled as future monitoring guidelines and mitigation as needed.

General Considerations/Site Design and Construction

General:

- Where necessary for resource or visitor protection, work areas will be identified with construction fence, silt fence, or some similar material prior to any activity. The fencing will define the work zone and confine activity to the minimum area required. All protection measures will be clearly stated in the construction specifications, and workers will be instructed to avoid conducting activities beyond the work zone. Disturbances will be limited to areas inside the designated construction limits. No machinery or equipment will access areas outside the work limits.
- Construction equipment staging will occur within previously disturbed areas as much as possible. All staging and stockpiling areas will be returned to preconstruction conditions following construction. Contractors will be required to properly maintain construction equipment (i.e., mufflers and brakes) to minimize noise.
- All tools, equipment, barricades, signs, surplus materials, and rubbish will be removed from the project work limits upon project completion.

Site Design and Construction:

- Identify and avoid unstable slopes and local factors that can cause slope instability.
- Develop a stormwater management plan to ensure compliance with regulations and prevent off-site migration of contaminated stormwater or increased soil erosion.
- Minimize the planned amount of land to be disturbed.
- Re-establish the original grade and drainage patterns to the extent practicable.

Natural Resources

Past and Ongoing Monitoring and Mitigation Measures:

- Ongoing park staff management and maintenance of turf will continue.
- Ongoing maintenance of trees and other vegetation within the park will continue.
- When sites are disturbed by maintenance or construction activities, park staff will re-establish vegetation based on recommendations of existing resource plans.

Future Monitoring and Mitigation Measures:

- Vegetation management will be consistent with CLTP/EA recommendations and development of a comprehensive Vegetation Management Plan.
- Best Management Practices (BMPs) will be required to support the implementation and management of actions taken in the selected alternative. Refer to established BMPs for water quality actions. The NOAA Great Lakes Environmental Research Laboratory Strategic Plan and the Village of Put-in-Bay have established BMPs.
- Erosion and sediment controls will be employed as needed and as required by regulations during construction to reduce soil erosion.
- Natural resource management will be integrated in an overall program of cultural resource management of the historic designed landscape.
- When soil excavation is an unavoidable part of an approved facility development project, the NPS will minimize soil excavation, erosion, and offsite soil migration during and after the activity.
- Temporary barriers will be provided to protect existing trees and shrubs that are not identified for removal during construction activity.
- Vegetation filter strips will be used to filter and clean sediment, organic material, nutrients, chemicals, and other pollutants from run-off water as it leaves a non-point source.
- Impacts to wetlands and other water resources will be avoided and minimized to the fullest extent possible, and BMPs will be utilized to minimize erosion and sedimentation.
- Because federally listed species as well as state listed species fall within the range of the project area and a one-mile radius beyond as defined by USFWS, the park will coordinate with the USFWS when specific projects are to be implemented.

Cultural Resources

Past and Ongoing Monitoring and Mitigation Measures:

- Monitoring of archeological sites will occur to determine visitor safety and resource protection concerns.
- Monitoring water resource margins and shoreline will continue for erosion and associated emerging archeological resources.
- Monitoring the Memorial column and plazas for any damage, potential damage, or vandalism will continue.
- Prior to all construction or maintenance activities, cultural resources are identified and avoided to the extent possible.
- Ongoing management focusing on retaining and enhancing the general historic character of the Memorial and Grounds will continue.

Future Monitoring and Mitigation Measures Required:

- It is required that all activities will comply with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (48 Federal register 44716, revised).
- All ABAAS accessibility interventions will be guided by Preservation Brief 32: *Making Historic Properties Accessible* and the *Accessibility Management Plan for Perry's Victory and International Peace Memorial* (2018).
- NPS will coordinate with the SHPO throughout the course of the project to protect and provide mitigation agreements for resources affected by the selected alternative.
- Site condition assessments by NPS-approved archeologists will be part of project-specific surveys.

Visitor Use and Experience

Past and Ongoing Monitoring and Mitigation Measures

- Incidences of human interactions are monitored.
- Visitation data is monitored through various methods such as visitor surveys, transportation data, and concessioner data.
- Periodic visitor surveys and data collection are used to determine visitor use patterns, visitor characteristics, visitor use conflicts, and visitor preferences and satisfactions with interpretive and recreational opportunities, programs, services and facilities.
- Resource condition surveys are conducted as needed.
- Continued management of the Memorial and Grounds facilitates the visitor's understanding of the significance of the site and the Battle of Lake Erie in 1813.
- NPS managers will continue to monitor areas used by visitors for signs of native vegetation disturbance, trampling, erosion, or the development of social trails in the designed historic landscape.

Future Monitoring and Mitigation Measures Required:

- Visitor use and access to areas of highly sensitive and vulnerable cultural or natural resources requires mitigation measures. Appropriate activities in these areas will be limited to research and passive recreational uses. Interpretive programs and exhibits will provide information and interpret ongoing research activities.
- The Visitor Center will be made fully accessible as will the entire park, based on the *Accessibility Management Plan for Perry's Victory and International Peace Memorial* (2018.)

Human Health and Safety

Past and Ongoing Monitoring and Mitigation Measures:

- Inform the general public of construction activities or other management or maintenance activities through press releases and general interpretive presentation.
- No public access is allowed to any area of construction.
- Appropriate regulatory and/or enforcement agencies are notified prior to any construction to assist in safely managing pedestrian or vehicular traffic. Warning signs are posted along village roads and pedestrian circulation in the park and the community as necessary.
- Golf cart use of the pedestrian walkways throughout the historic designed landscape is monitored and re-directed off the historic landscape.

Future Monitoring and Mitigation Measures Required:

- The ongoing and required measures already in place that ensure visitor safety will continue where appropriate in the implementation of the actions proposed in the selected alternative.
- NPS staff will mitigate impacts arising from increases in visitation due to expanded facilities and interpretation at the park.

ATTACHMENT B

DETERMINATION OF NO IMPAIRMENT

Cultural Landscape Treatment Plan and Environmental Assessment

Perry's Victory and International Peace Memorial Put-in-Bay, Ohio

National Park Service (NPS) *Management Policies 2006* (§ 1.4) requires analysis of potential effects to determine whether or not actions will impair a park's resources and values. The fundamental purpose of the national park system established by the Organic Act and reaffirmed by the General Authorities Act, as amended, mandates the NPS conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values. However, the laws do give NPS management discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of the park, although that discretion is limited by the statutory requirement that the NPS must leave resources and values unimpaired unless a particular law directly and specifically provides otherwise.

The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. Non-resource topics are generally not subject to impairment assessment. Whether an impact could lead to impairment depends on the particular resources that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or the opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact may be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. Impairment may result from visitor activities, NPS administrative activities, or activities undertaken by concessioners, contractors and others operating in the park. Impairment may also result from sources or activities outside the park.

An impairment determination is not made for all resource impact topics analyzed for the selected alternative. An impairment determination is not made for land use, visitor use and experience, and visitor health and safety because impairment findings relate back to park resources and values. These impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

Soils and Geology

There will be no impact to geologic resources. There will be a number of disruptions to surface soils due to construction and grading within the selected alternative. Soils disturbed by development are fill soils that were previously added into

park management zones, specifically in the historic core zone. Cut and fill amounts will be balanced to the extent possible to minimize the need to import or export soils during construction. Additionally, the cut and fill of soils on the grounds will be designed to result in no net change in the soil loads surrounding the Memorial. The generally flat topography of the park will be retained in the selected alternative, diminishing the potential for erosion on the landscape during construction. Temporary impacts to soils from erosion will be minimized by implementation of mitigation measures. Most impacts are associated with specific small areas of the park and will last through the time of project completion. Long-term positive impacts to soils are expected due to soil stabilization, design of walkway alignments to avoid slopes, and minimal ongoing soil erosion maintenance associated with all park project activities. Thus, the selected alternative will not impair geology and soil resources.

Water Resources and Floodplains

Some of the actions within the selected alternative will require ground disturbance during construction. This ground disturbance will not have a measurable effect on the frequency, elevation, intensity or duration of floods, and will not cause changes in the ability of a floodplain to convey floodwaters. Actions will not contribute to enhancing flood events. The historic core has been filled repeatedly since construction of the Memorial in 1915. With mitigation measures and monitoring, there will be negligible adverse impacts to water resources and floodplains. Impacts will be avoided and minimized and best management practices will be utilized to minimize erosion and sedimentation. To further reduce the potential for sedimentation and contamination impacts to surface waters, proposed impervious surface features such as sidewalks will be designed to minimize surface areas. Analysis of the National Wetland Inventory (NWI) indicates that the selected alternative will not disturb land that contains wetlands. Thus, the selected alternative will not impair surface waters, wetlands, or floodplains.

Vegetation

Actions associated with implementation of the selected alternative will result in ground disturbance but resulting impacts to vegetation will be short-term and minor. Impacts will not threaten the viability of plant communities or native plant species and the sites will easily recover from temporary disturbance. Mitigation measures for vegetation and turf protection will be implemented to avoid long-term impacts that extend beyond the duration of the action project. Mitigation will include selection of appropriate staging locations for equipment and materials for all projects and erosion and sediment control measures will be incorporated during any level of construction. The overall impact from the selected alternative will be beneficial and will modify the vegetation to improve its role in fulfilling the park's purpose of preserving the historic designed landscape and preserving cultural and natural resources. Thus, the selected alternative will not impair vegetation resources.

Wildlife

There will be no long-term adverse impacts on wildlife and wildlife habitat from the actions within the selected alternative. Most impacts will be localized and positive and associated with specific vegetation proposed for the park. Specific actions resulting from the implementation of the selected alternative associated with potential impacts on wildlife and wildlife habitat will include: introduction of ground cover or low shrubs on the berm surrounding the lower plaza and proposed tree plantings east and west of the historic core. These two actions will provide expanded habitat for a diversity of wildlife species including birds, butterflies, moths, and snakes. Development of the Peace Garden will present an opportunity to introduce plant materials that attract butterflies and provide habitat. These actions will have a positive impact on wildlife extending far into the future of the park. Thus, the selected alternative will not impair wildlife resources.

Threatened and Endangered Species

Based on the review of the project area by Ohio Department of Natural Resources and comments prepared by the U.S. Fish and Wildlife Service during consultation, there are three species of concern that may be affected by actions in the selected alternative. The species include the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species; Lake Erie water snake (*Nerodia sipedon insularum*), a state threatened species and federal species of concern; and the Kirtland warbler (*Setophaga kirtlandii*), a state endangered and federally endangered bird. NPS and park staff will coordinate with USFWS on a project by project basis to determine if the species and or potential habitat are present and potentially impacted by the action within the selected alternative. If it is determined that an impact might occur based on the project, park staff will implement mitigation measures outlined by USFWS for each species.

Actions associated with the selected alternative do not include tree removal, identified as a potential impact on the Indiana bat. Also, the project area does not have any forest cover protecting potential roosting trees for the Indiana bat. The USFWS states that "if no tree removal is proposed, this project is not likely to impact this species."

Due to the presence of the north and south seawalls within the project boundary, there is the potential for hibernation habitat for the Lake Erie water snake. Monitoring will be conducted before and during any construction associated with the selected alternative by an individual trained to identify Lake Erie water snakes. If necessary, mitigation consisting of limited dates for construction activity will be implemented, avoiding the hibernation season of October 15th to April 15th.

Actions associated with the selected alternative do not include clearing of forested or shrub/scrub habitat. This should eliminate potential adverse impacts to the Kirtland warbler. If necessary, mitigation consisting of limited dates for construction activity will be implemented, avoiding excavation from April 22nd through June 1st and from August 15th through October 15th.

With implementation of monitoring and mitigation as described by the USFWS, actions associated with the selected alternative will not impair rare, threatened or endangered species within the park.

Historic Buildings and Structures

Current management regimes will continue within the selected alternative including repair and maintenance to historic buildings and structures within the park. Historic buildings and structures considered contributing features from the period of significance include the Memorial column, plazas and stairs, and the men's dormitory (former superintendent's residence). These features will be preserved, managed, and maintained as cultural resources. The Memorial column, plazas, and steps are considered significant site resources and are essential in maintaining the integrity of the historic site. Due to the goals for ABAAS accessibility identified by the park, there will be a moderate impact to the steps to the plazas, one of the character defining features of the Memorial design. Alteration of the steps for accessibility will diminish the overall integrity of this feature but will not jeopardize the historical integrity of the Memorial structure and grounds to the extent that it will lose its current listing in the National Register. In a letter dated September 19, 2018, the SHPO agreed with the NPS determination that the selected alternative is unlikely to have adverse effects on the historic memorial and its designed landscape. They recognized that further consultation is needed to examine details as the stair repair and accessibility project moves forward. Expanded interpretation that includes historic buildings and structures within the cultural landscape will have a long-term beneficial impact on these resources and the enhancement of the visitor experience. Thus, the selected alternative will not impair historic buildings and structures.

Cultural Landscapes

Specific actions resulting from the implementation of the selected alternative accomplish objectives to retain and enhance the landscape elements and features that are contributing resources to the cultural landscape. Grading of the topography will retain the symmetry around the Memorial while retaining the open space setting of the historic designed landscape. Many of the existing walkways within the historic core of the park are retained. The circulation design will retain the open symmetrical lawn areas to the east and west of the Memorial. The selected alternative will preserve the openness and restore some of the original Beaux Arts design intent for the landscape. Overall this alternative will respect and enhance the landscape and setting of the Memorial and grounds and afford visitors opportunities for expanded interpretation through integration with the cultural landscape. Impacts to the cultural landscape will be long-term and beneficial due to preservation of the historic core and reinforcing the Beaux Arts design intent by integrating the cultural landscape more wholly with the interpretive story of the site. Therefore, the selected alternative will not impair the cultural landscape of Perry's Victory and International Peace Memorial.

Historic Viewsheds

In the original design for the Memorial, Freedlander and Seymour considered views to and from the monument, utilizing Beaux Arts planning features such as axial avenues and planned vistas. The Perry's Victory and International Peace Memorial including its formal grounds was designed to be viewed principally upon approach to Put-in-Bay from the north, particularly from Gibraltar Island. Also, the designed view afforded by the observation platform near the top of the Memorial column to the location of the Battle of Lake Erie is an essential feature of the historic core. Specific actions resulting from the implementation of the selected alternative and associated with potential impacts on historic viewsheds will include installation of underground powerlines along Bayview Avenue from Hartford to Toledo Avenues; additional tree plantings strategically located to enhance views to the Memorial; and preservation of open space around the memorial column and plazas. These actions will have a long-term positive impact on historic viewsheds both to and from the memorial and viewsheds to the memorial from various pedestrian and vehicular circulation patterns. Also, preservation and restoration of historic viewsheds will have long-term beneficial effect on the cultural landscape as a result of expanded interpretation of the historic context of the battle at sea. Thus, the selected alternative will not impair historic viewsheds or viewsheds critical to enhancement of the visitor experience.

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Chapter 1: Introduction

Background

This cultural landscape treatment plan is an update to the treatment guidelines provided in the cultural landscape report (CLR) for Perry's Victory and International Peace Memorial (PEVI), completed by the National Park Service (NPS) in 1994.¹ An update was needed because: 1) the 1994 CLR is over twenty years old and its treatment guidelines are no longer consistent with the park's goals and objectives; 2) the CLR was completed prior to approval of the current standards for the treatment of cultural landscapes; 3) the park has accrued features from both planned and extemporaneous decisions during the twentieth century, and guidance is needed regarding for intentional preservation or rehabilitation of the designed landscape.²

This update addresses the entirety of the park, including the 14.5 acres of the National Register of Historic Places-listed (NRHP) historic site of Perry's Victory and International Peace Memorial, referred to in this report as the "historic core," as well as the surrounding lands acquired by the NPS for the park, for a total of 25 acres.

Methodology

Work on the update began with documentary research on the evolution of the park since 1994, gathered from the 1994 CLR, the 2014 NRHP *Perry's Victory and International Peace Memorial Additional Documentation* (2014 NRHP Additional Documentation), and other resources, including maps and photographs gathered from the park and other collections.³

Research was followed by fieldwork, conducted in 2016-17 to confirm and/or update conditions recorded in the 1994 CLR and the 2014 NRHP Additional Documentation.

Next, the project team compared the integrity evaluations from the 1994 CLR and the 2014 NRHP Additional Documentation, noted which evaluations still accurately reflected current conditions, and updated incorrect or outdated information. The team also evaluated changes to the park outside the historic core since the end of the period of significance (1911-1963), noted how those changes affected its historical integrity, and identified features outside the historic core that may merit special attention in the treatment plan. This comparative analysis, presented in Chapter 2,

1 Sherda K. Williams and Susan Calafate Boyle, *Perry's Victory and International Peace Memorial Put-in-Bay, Ohio: Cultural Landscape Report* (Omaha NE: National Park Service, 1994).

2 Current standards for the treatment of cultural landscapes are published in Charles A. Birnbaum and Christine Capella Peters' *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (Washington DC: National Park Service, 1996).

3 Deborah E. Harvey, *National Register of Historic Places Additional Documentation for Perry's Victory and International Peace Memorial*, (2014). "Additional documentation" is the NRHP name for a revision to the first NRHP nomination for a historic property. Additional documentation can range from the addition of a single resource to a historic district to what is essentially a complete replacement of the earlier nomination.

Introduction

is organized by landscape feature so that it can be used in conjunction with the treatment plan.

The treatment plan, presented in Chapter 3, was based on the comparative analysis, and input from the park and the public, and offers guidance and support for the long-term management and interpretation of the park and its resources, organized by management zone, and based on the guidelines for the rehabilitation of cultural landscapes as outlined by the Secretary of the Interior.⁴ The plan is illustrated by two alternative design concepts for treatment, including the addition of new circulation features, open event pavilions, plantings, and interpretive and contemplative waysides and nodes.

The final chapter, Chapter 4, presents an environmental assessment that evaluates the two alternatives proposed in the treatment plan, along with a “no-action” alternative. The chapter also identifies the “preferred alternative,” and assesses the potential impacts and effects of that proposed action in accordance with the National Environmental Policy Act (NEPA) of 1969 and concurrently with Section 106 of the National Historic Preservation Act (NHPA) of 1966, and Section 7 of the Endangered Species Act of 1973.

4 Birnbaum and Peters, 1996.

Chapter 2: Integrity Assessment

Introduction

This chapter presents an evaluation of the contributing and noncontributing features of the historic core of Perry's Victory and International Peace Memorial (PEVI). The historic core is that part of PEVI that comprises the original 14.5-acre site set aside for the construction of the Memorial in 1911 (Figure 2-1). The historic core is the same as the historic site identified in the 2014 National Register of Historic Places (NRHP) Additional Documentation, an update to the 1976 NRHP nomination, which had previously listed the site as 12.1 acres.¹ The 2014 NRHP Additional documentation also extended the period of significance from 1913-1931 to 1911-1963, and updated the integrity assessment provided by the earlier nomination, and the 1994 PEVI cultural landscape report (CLR).²

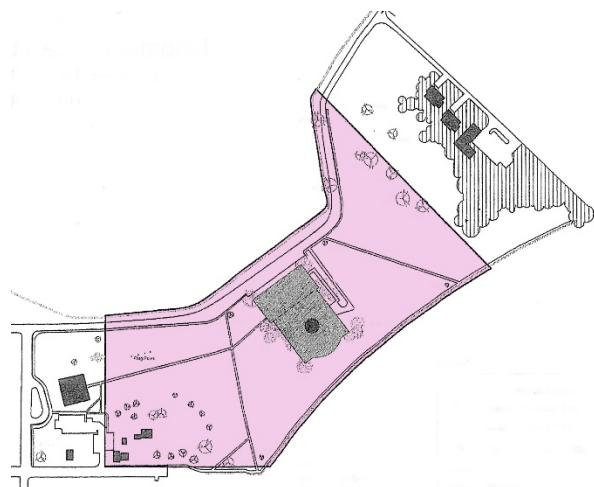


Figure 2-1: 2014 Perry's Victory and International Peace Memorial historic site National Register of Historic Places boundary.

This integrity assessment updates those provided in the 1994 CLR and the 2014 NRHP Additional Documentation regarding the historic core. Although the 2014 NRHP Additional Documentation is more recent, the 1994 CLR provides a more detailed assessment of cultural landscape features. Details of the Memorial building were further described in more detail in the 2014 NRHP Additional Documentation, but for the purposes of this report, only the assessment of the paving conditions of the upper and lower plazas will be discussed.

Starting with a general overview and update of the two previous integrity assessments, this chapter then presents an updated assessment, identifying changes to integrity noted during fieldwork conducted at the site by Commonwealth in 2016-2017. The updated integrity assessment is organized by landscape characteristic per NPS guidelines.³ Although most of the discussion addresses features within the historic core, the final section addresses features outside the boundary, but within the park, that may affect the integrity of the historic core.

The locations of the discussed features are indicated on Figure 2-2, which illustrates the existing conditions at Perry's Victory and International Peace Memorial, and Figure 2-3, which illustrates the contributing features of the historic core.

1 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation;" Busch, "Perry's Victory and International Peace Memorial."

2 Williams, *Cultural Landscape Report*.

3 Page, Gilbert, and Dolan, *A Guide to Cultural Landscape Reports*, 53.

Previous Integrity Assessments

This section presents a review of the conclusions made regarding the historical integrity and contributing/noncontributing features of Perry's Victory and International Peace Memorial as put forth in the 1994 CLR and the 2014 NRHP Additional Documentation.

1994 Perry's Victory Cultural Landscape Report

In its integrity assessment, the 1994 CLR discussed landscape features within the historic core, the overall park, and within adjacent properties as the setting of this landscape. The CLR concluded that the landscape characteristics of topography and drainage, circulation systems, structures and buildings, and small-scale features all exhibited a high level of integrity to the period of significance. However, because of the loss of most ornamental vegetation planted before 1931, vegetative features exhibited only a medium level of integrity. The loss of large shade trees and barberry hedges along the east and west sides of the historic core also weakened its boundary definition and led to patterns of spatial organization meriting only a medium level of integrity. Properties adjacent to the historic site were considered important as its setting, but the loss of the modestly scaled wood houses in the adjacent neighborhood to the west led to the low integrity rating of the character of adjoining properties and affected the overall historical integrity of the site.⁴

- *Update:* This assessment was completed before the removal of Chapman Avenue and the construction of the PEVI visitor center in 2002, and other, more minor, changes implemented since 1994. As described in more detail below, the removal of the historic street and its street trees around 2002 contributed to

the loss of boundary definition along the west edge of the historic core.

2014 National Register of Historic Places Additional Documentation

The Additional Documentation states that the most significant changes to the historic site after 1963 were associated with rehabilitation campaigns in the late 1970s and early 1980s, including the reconstruction of the seawalls, the construction of additional retaining walls and sidewalks, and the replacement of the original sandstone pavement on the Memorial plazas with granite. It also mentions the changes to the setting of the historic site with additions to park acreage in the mid-1900s, the construction of the maintenance facility and staff housing to the east in 1992, and the construction of the new visitor center in 2002. The nomination concludes that “[a]lthough this construction has negatively impacted the appearance of the perimeter of the site, in general the original portion of the site [the nominated 14.5 acres] retains its historic integrity.”

The 2014 Additional Documentation goes on to say that the historic site is nationally significant under Criterion A in the areas of Social History, Politics, and Government; under Criterion C in the areas of Architecture and Engineering; and under Criterion Consideration F: Commemorative Properties for its age, design, and symbolic value.⁵

- *Update:* Unfortunately, the Additional Documentation reported that “[t]he historic portion of the site has changed little between 1936 and the present,” overlooking the addition in 1951 of the residence and garage for the Superintendent's House (now the Men's Dormitory). Further, its conclusion also erroneously omits the site's significance under Criterion C in the area of landscape

4 Williams, *Cultural Landscape Report*, 74-100, 139-140.

5 Harvey, “Perry's Victory and International Peace Memorial Additional Documentation,” 8-96 and 8-97.

**Cultural Landscape
Treatment Plan and
Environmental Assessment**

for

**Perry's Victory and
International Peace
Memorial**

November 2018



Legend

- Memorial Park Boundary
- Vehicular circulation
- Concrete sidewalk
- 2' Contours
- Existing buildings
- Existing structures
- Existing trees

Management Zones

- Historic Core
- Visitor Access/Park Administration
- Park Housing/Maintenance

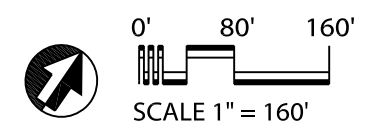


Figure 4-4
**Alternative 1
Existing Conditions**

This drawing was prepared to illustrate the Environmental Assessment for Perry's Victory and International Peace Memorial in 2018. This drawing is provided to illustrate potential treatment alternatives, and is not intended to serve as a design or construction document.

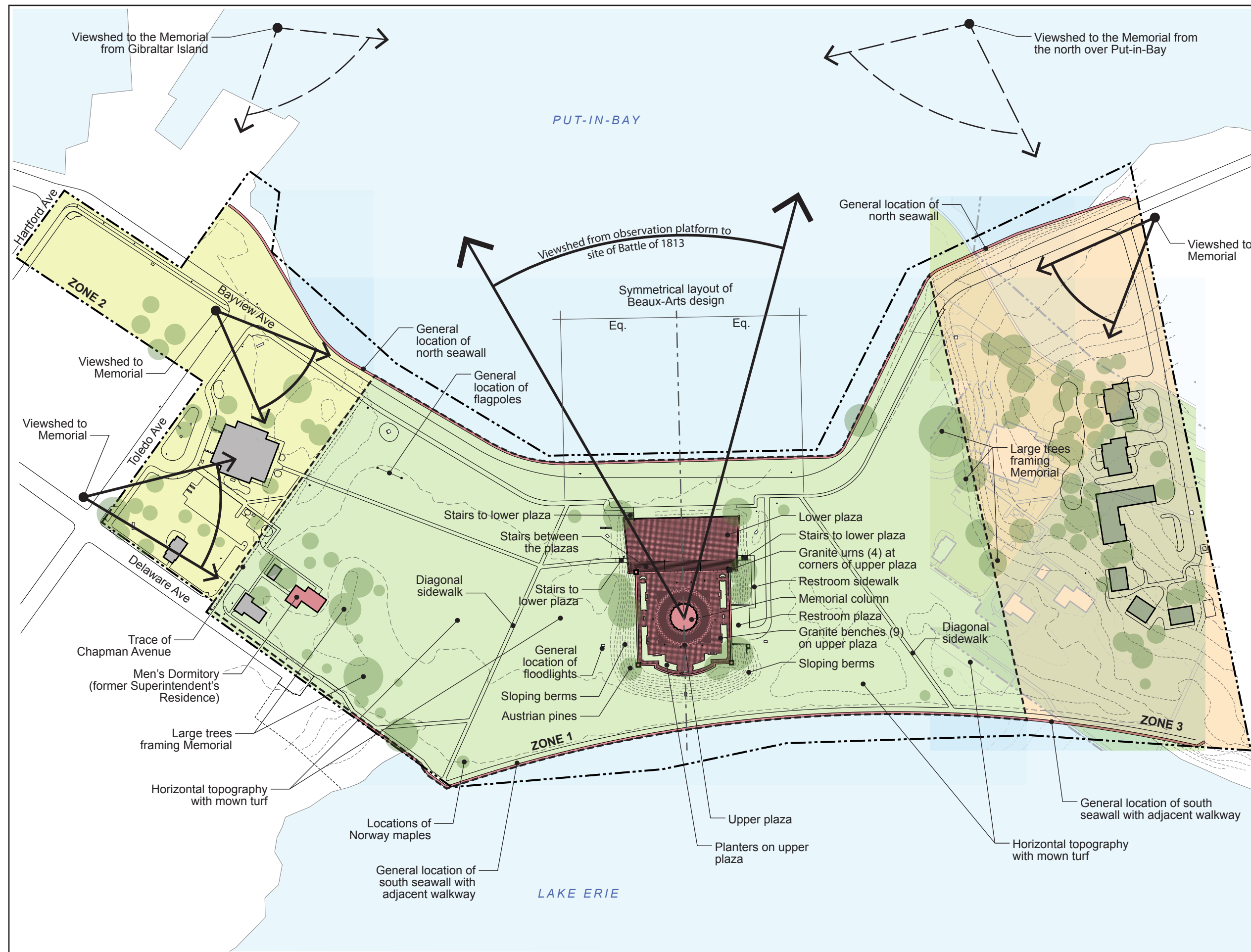
Data Sources: Base map based on GIS shapefiles provided to the authors by NPS and supplemented through with aerial photography and other NPS maps

**Cultural Landscape
Treatment Plan and
Environmental Assessment**

for

**Perry's Victory and
International Peace
Memorial**

November 2018



Legend

- Memorial Park Boundary
- National Register Boundary
- 2' Contours
- Contributing buildings
- Contributing structures
- Non-contributing buildings
- Existing trees

Management Zones

- 1 ■ Historic Site
- 2 ■ Visitor Access/Park Administration
- 3 ■ Park Housing/Maintenance

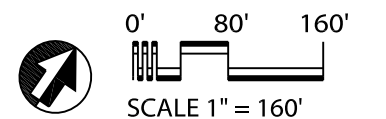


Figure 2-3
Contributing Features

Data Sources: Base map based on GIS shapefiles provided to the authors by NPS and supplemented through with aerial photography and other NPS maps

architecture, although this is described earlier in Section 8 of the document.⁶

2017 Integrity Assessment

This assessment is organized by landscape characteristic: topography and grading, spatial organization, circulation, vegetation, buildings and structures, views and vistas, and small-scale features. An additional category, setting, is provided at the end to describe the character of adjacent lands and their effect on the historical integrity of the historic core.

Where an adequate assessment of the integrity of a landscape characteristic was provided in the 2014 NRHP Additional Documentation, the update addresses that document only; if not, the update addresses the assessment provided in the 1994 CLR. The update for each characteristic is followed by a summary of contributing, noncontributing, and missing features from the period of significance, 1911-1963. Figure numbers have been added in brackets.

Topography and Grading

The 1994 CLR provides an excellent and comprehensive description of the topography and grading of the park. It concludes that the integrity of the level topography of the Memorial's grounds as "the first of three horizontal planes that accentuate and balance the verticality of the column (the plazas being the other two planes)" is unchanged from the period of significance. It also concludes that the earthen berms that fall from the upper and lower plazas to this level plane maintain their integrity and contribute to the historic character of park. Finally, although part of the eastern side of the earthen berm below the upper plaza was removed for the construction of the restrooms in the 1950s, the CLR concludes that the 1984-85 addition of granite retaining walls to stabilize its slopes met a functional need, and the

area remains visually compatible with the historic character of the park.⁷

Update: As of 2016, these conditions have changed little, although it should be noted that the earthen berm is eroding where bare earth is exposed underneath the pines (Figure 2-4). Overall, however, the topography and grading within the historic core continue to contribute to its integrity.

Contributing: Level topography, earthen berm around Memorial plazas.

Noncontributing: Granite retaining walls added in 1984-85.

Missing: Earthen berm on the eastern side of the Memorial.



Figure 2-4: Area of erosion of the earthen berm under the Austrian pines. CHG

Spatial Organization

As described in the 1994 CLR, the historic core has an open character created by the horizontal plane of open lawn to each side of the column and the flat planes of the Memorial's plazas, which together emphasize the column's verticality

6 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 8-81.

7 Williams, Cultural Landscape Report, 81-82. Note: the 2014 Additional Documentation overlooks the importance of the berms in contributing to the overall historic character of the site.

(Figure 2-5).⁸ During the monument's construction, utility lines that once crossed the property were buried underground, further contributing to the open character of the historic core.⁹

Groups of trees at the eastern and western edges of the historic core were preserved and supplemented by Freedlander to enclose the edges of the Memorial grounds and further enhance the verticality of the column. The 1994 CLR comments that the loss of large trees at the east and west boundary of the historic core (more on the east), which once served to frame the composition and provide a visual boundary, has weakened the integrity of spatial organization.¹⁰

The boundaries of the historic core to the east, west, and south were originally further delineated with a double row of barberry hedges, which defined a balanced spread of lawn to each side of



Figure 2-5. View of the Perry's Victory and International Peace Memorial in the late 1920s, showing the flat, open lawn of the site, framed by large trees to the east and west. NPS

8 Williams, *Cultural Landscape Report*, 81. This is typical of the Beaux-Arts approach that became influential in American design starting in the 1870s. The Beaux-Arts is a neo-classical design style that re-interpreted ideas from French classical monumental architecture, landscape architecture, and urban planning. Versailles is an example of a French classical composition of architecture and landscape design that influenced American designers like L'Enfant, who designed the first plan for Washington, DC. Characteristics of the Beaux-Arts style in landscape design included balanced, usually symmetrical, arrangements of components, axial avenues, grand vistas, and monuments that created a dramatic visual experience.

the Memorial building, a spatial balance typical of the Beaux-Arts style (Figures 2-6 through 2-8). The 1994 CLR states that, even with the loss of the hedges, this symmetry remains intact as a contributing feature of the historic core.¹¹

Update: The park has begun to replace the large trees that were gradually lost over time. Although the trees are replacements, the restoration of this pattern of vegetation strengthens the historic character of the historic core. There are no plans to replace the barberry hedges.



Figure 2-6: View of the Memorial column from the south seawall, showing the barberry hedge ca. 1945. NPS

9 Williams, *Cultural Landscape Report*, 95.

10 Williams, *Cultural Landscape Report*, 97.

11 Williams, *Cultural Landscape Report*, 97.

Contributing: Open lawn, flat planes of Memorial plazas, lack of utility lines, pattern of large trees framing the Memorial composition.

Noncontributing: New trees.

Missing: Several original large trees and barberry hedges that marked the boundaries of the original Memorial site.



Figure 2-7: View west from the observation deck, annotated to show location of original west boundary. CHG



Figure 2-8: View east from the observation deck, annotated to show location of original east boundary. CHG

Circulation

The circulation system within the historic core comprises roads, a parking lot, and sidewalks. The roads include Bayview Avenue (State Highway 357), which passes through the park on its northern edge, and Delaware Avenue on the

southwest, both of which were in place before the construction of the Memorial. The parking lot on the north side of the lower plaza was constructed in 1915 and remains in its historic location. Although the roads and the parking lot have been repaved since they were constructed, the 2014 NRHP Additional Documentation considers them to be contributing features of the historic core.

Chapman Avenue, which once marked the western boundary of the historic core of the park, was removed for the construction of the visitor center in 2002. The visitor center parking lot entrance drive was constructed in 2002 on top of the southern end Chapman Avenue and the old street's trace can still be perceived in the slight dip in the landscape, a remnant of its streetside drainage ditch (Figure 2-9). Although traces remain, the loss of Chapman Avenue, as stated in the 2014 NRHP Additional Documentation, "impairs understanding of the western boundary of the original site."¹²

For pedestrian circulation, Freedlander's original 1924 design proposed two parallel sidewalks flanking the Memorial from the parking area to the south seawall (Figure 2-10).¹³ However, it was the Memorial Commission's Building Committee that proposed the two diagonal sidewalks from the Memorial's lower plaza to the sea wall that were constructed in 1925, at the same time as the



Figure 2-9: View along the old trace of Chapman Avenue. The dip that marks the location of its roadside ditch is marked by the red dashed line. CHG

12 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 7-14.

13 Freedlander, "Reservation Showing Parking of Grounds."

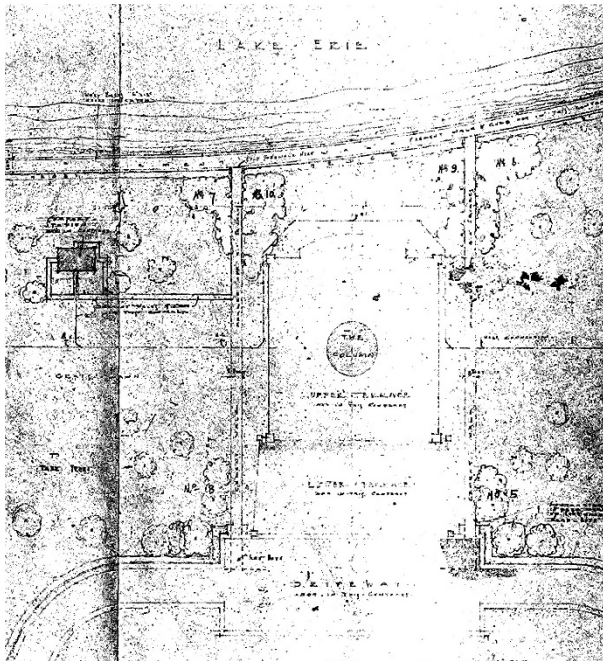


Figure 2-10: Freedlander's 1924 plan, "Reservation Showing Parking of Grounds," showing the two proposed parallel walkways flanking the Memorial building. NPS

sidewalk along Bayview Avenue, the south seawall sidewalk, the short sidewalk that leads to the side stairs of the lower plaza, the side stairs, and the stairs that lead to the lower plaza at the front side.¹⁴ The two sets of stairs, originally wood, were reconstructed in concrete later during the period of significance. All these sidewalks were reconstructed in the 1970s "in kind," that is, of concrete in the same dimensions as the originals. In addition, although the south sidewalk was rebuilt when the south seawall was reconstructed and extended in 1977–1978, the general idea of a sidewalk along the south seawall dates to the period of significance.

The sidewalk and stairs that provide access to the Memorial restrooms from the lower plaza, along

with the plaza outside the restrooms, were installed in the 1950s and are considered contributing features since the period of significance was expanded to 1963 through the 2014 NRHP Additional Documentation. The parallel sidewalk that is used for park utility vehicles was installed in the 1970s. The short, diagonal concrete sidewalk that connects the west diagonal walk to the south seawall sidewalk was built during the 1977-78 seawall reconstruction project to replace a wood boardwalk there that dated to the early 1970s. The wood boardwalk had been constructed to traverse the marsh that had re-established itself in that area.¹⁵

Update: The diagonal sidewalk that was built in 2002 to connect the visitor center to the Memorial is not mentioned in the 2014 NRHP Additional Documentation. Although placed on axis between the centerline of the visitor center and the Memorial column, the walkway does not define two balanced or symmetrical spaces per the Beaux-Arts ideal, and leads to only a side stair to the lower plaza (Figure 2-11).

Contributing: Bayview Avenue, Delaware Avenue, trace of Chapman Avenue, two main diagonal sidewalks, restroom access sidewalk and stairs, and sidewalk to the lower plaza stairs, as well as both sets of stairs to the lower plaza.

Noncontributing: Short, diagonal sidewalk that replaced the wood boardwalk in the 1970s, park utility sidewalk, and sidewalk between the visitor center and the memorial.

Missing: Wood stairs that preceded the concrete stairs to the lower plaza and original south seawall sidewalk.

14 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 8-84 and 8-85. The diagonal walk extending from a central point, called a "patte d'oie" (goose foot) in French, was a regular feature of the French classical garden and the idea was imported into the neoclassical Beaux-Arts site plan. It may have been the intent of the Building Committee to create a similar effect with these diagonal walks.

15 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 8-94.



Figure 2-11: Diagonal walkway that connects the visitor center to the side stair of the Memorial's lower plaza. CHG

Vegetation

Lawn

Vegetation has been used as an essential element of the design of the memorial since its inception. When construction on the Memorial began in 1912, most existing vegetation was cleared to make way for the filling and grading required to create the flat, horizontal base from which the plaza and column would rise. The most important vegetation feature, therefore, is the maintained lawn into which the Memorial was set. It provides, as stated in the 2014 NRHP Additional Documentation, “a visual counter to the verticality of the Memorial column [that is] integral to the original design concept [and] exists today essentially as designed,” and contributes to the historical integrity of design, scale, feeling, and association of the historic site.¹⁶

Update: The park continues to maintain the lawn as a manicured lawn.

Contributing: Manicured lawn.

Noncontributing: n/a

Missing: n/a

Large Trees

During the 1912 site preparation phase, several large trees were preserved on the east and west boundaries of the property (see Figure 2-5). Freedlander intended to leave these trees standing and supplement them with additional trees to help frame the Memorial column and provide a transition from the formal symmetry of the Memorial grounds to its more informal setting. A few of the larger trees that stand along the eastern and western boundaries of the historic core today may be mature enough to predate 1912, especially the large maple standing in the northeast corner of the historic core. At least two of the large street trees that once stood along Chapman Avenue, as recorded in the 1994 CLR, were removed in 2002 when the street was demolished and the new visitor center constructed. The loss of these trees has a negative effect on the integrity of the historic core because they contributed to the delineation of its western boundary.¹⁷

During the 1924–1926 construction period, four Norway maples were planted at each end of the two diagonal sidewalks. These have since been replaced in kind with new Norway maples. Another Norway maple was also planted in the 1920s at the intersection of the sidewalk to the lower plaza west steps and the western diagonal sidewalk. That tree blew over in a storm in the 1970s and has not been replaced.¹⁸

Update: The park continues to plant new trees to replace those lost along the east and west sides of the historic core and this pattern of vegetation

¹⁶ Harvey, “Perry's Victory and International Peace Memorial Additional Documentation,” 7-11.

¹⁷ Harvey, “Perry's Victory and International Peace Memorial Additional Documentation,” 7-12.

¹⁸ Harvey, “Perry's Victory and International Peace Memorial Additional Documentation,” 7-12.

continues to contribute to the historical integrity of the historic core. The four replacement Norway maples continue as a pattern of vegetation to contribute to the integrity of the historic core.

Contributing: Patterns of large tree massing on the east and west boundaries of the historic core, and four Norway maples.

Noncontributing: n/a

Missing: Trees protected and planted during the 1924-26 planting campaign, including trees along Chapman Avenue, and Norway maple at the intersection of the west diagonal sidewalk and the sidewalk leading to the west lower plaza stairs.

Austrian Pines

The most eye-catching trees growing within the historic core today are the fifteen Austrian pines (*Pinus nigra*) that stand on the earthen berms around the upper and lower plazas. These survive from the original group of “40 Large Clipped Austrian Pines” that were planted in 1925, presumably at Freedlander’s and/or the Commission’s direction (Figure 2-12).¹⁹ Only nine years later, though, in 1934, eleven of the pines were removed at the direction of the Commissioners because they blocked the floodlights’ beams that illuminated the column. It appears that these pines were transplanted to other locations in the park or off-site.

As summarized by the 2014 NRHP Additional Documentation, the remaining Austrian pines have outgrown the scale and clipped, conical shape that Freedlander intended. Although historically significant features and with integrity of location, they lack integrity of design and their effect as structural elements in the landscape (Figure 2-13).²⁰



Figure 2-12: Detail from photograph of the Memorial from the late 1920s after the Austrian pines were planted, showing their conical forms. NPS



Figure 2-13: Photograph of the Austrian pines in 2016, showing their current form. CHG

Update: Only fifteen of the Austrian pines remain today.

Contributing: Remaining Austrian pines.

19 One characteristic of the French classical garden, which also became part of the Beaux-Arts style was the clipped evergreen used as a sculptural form in the landscape, often playing a secondary role in defining space.

20 Harvey, “Perry's Victory and International Peace Memorial Additional Documentation,” 7-12.

Noncontributing: Shape and scale of remaining Austrian pines.

Missing: Twenty-five Austrian pines.

Barberries

Plantings completed in 1924–1926 also included double rows of barberry hedges that were installed along the boundaries of the historic site and in the planters on the upper plaza (Figure 2-14 and see Figure 2-6). Because these hedges had to be replaced several times over the next ten years, they were eventually removed. As stated above, the barberry hedges formed a clear boundary for the historic core and contributed to the formal Beaux-Arts style of the Memorial grounds.

Update: There are no remaining specimens of the original barberry plants installed at the Memorial. Because of the high cost of maintaining a lengthy, continuous hedge, the park has no intention of replacing the boundary hedges. It also has no intention of replacing the barberries that were planted on the upper plaza because they were not part of the original Freedlander planting concept.

Contributing: n/a

Noncontributing: n/a

Missing: Barberry hedges around the historic core and barberries in the upper plaza planters.



Figure 2-14: Photograph taken of the ticket booth ca. 1929 to 1934, showing the barberry plantings in the Memorial's upper plaza planters. *NPS*

Grass Panels

Although originally specified by Freedlander as “grass panels,” the plaza planters were planted with barberries in 1924–1926; the shrubs remained there until 1933. Since then, the NPS has restored the planters to grass, except for the two small north panels, which have been occasionally planted by the NPS in annuals. The 1994 CLR argues that because they no longer hold barberry, the panels have lost some integrity (Figure 2-15).

Update: The park maintains the planters as grass panels.

Contributing: n/a

Noncontributing: Grass panels in the upper plaza planters.

Missing: Barberries in the upper plaza planters.



Figure 2-15: Planters on the upper plaza are maintained in turf. Also visible is one of the granite benches and a low path light. *CHG*

Buildings and Structures

The 2014 NRHP Additional Documentation confirms that the buildings and structures considered as contributing to the historic site include the Memorial building, with its column and two plazas, and the Superintendent's Residence (now the Men's Dormitory).

Noncontributing buildings and structures include both the north and south seawalls, the Ranger Operations Center, and a storage building that

replaced the Superintendent's Residence garage between 1994 and 2014.²¹

The Perry's Victory Memorial²²

Although the Memorial column and plazas were mostly finished by 1914, the surfaces of the upper and lower plazas of the Memorial building were not paved until the mid-1920s. Until then, the plazas were maintained in gravel held in place by granite coping until funding could be found to install a hard surface.

Freedlander had originally intended that the plazas would both be paved in granite. Although his original 1912 proposal has been lost, historian David Henderson argues that Freedlander's design intent was clear:

He and his fellow architects worked in an age of monuments, when the grandeur of the architectural design concept demanded execution in materials of suitably high quality...and granite was a material "for the ages," entirely appropriate for use as plaza paving where great durability and dignity would be required.²³

Freedlander explained this in a letter to F. E. Whitehouse of the NPS in 1938, saying that "paving of native sandstone was intended as a temporary one only and was to be replaced in the near future, by a permanent paving of granite, in

conjunction with the completion of the Memorial."²⁴

However, in 1914, Freedlander was forced to substitute local sandstone as a temporary cost-saving measure until funding for granite could be found. The lower-cost materials Freedlander specified in the 1914 construction documents were Berea sandstone, with granite, bluestone, and brick accents:

The main coping around "The Plaza A" [upper plaza], the steps, the benches[,] and pedestals of [the lower plaza] shall be pink Milford granite. The coping and the step of [the lower plaza] shall be gray Milford [g]ranite. All other paving and coping shall be gray sandstone, except mosaic around "The Column," which shall be either buff sandstone or bluestone. The sandstone shall be of the Cleveland Stone Co....Where paving brick is shown on the drawing it shall be a red standard size beveled edge vitrified brick.²⁵

The construction plan for the plazas showed the upper plaza as having a body of sandstone, with two concentric rings of a "Harlequin" patterned mosaic of "dark stone" with a lighter stone, separated by a ring of "vitrified brick laid on edge breaking joints," surrounding the column. Four panels of vitrified brick provided accents at four corners.²⁶ As described in the 2014 NRHP Additional Documentation, the overall effect would read as a patriotic combination of red (brick), white (granite), and blue (granite),

21 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 7-7.

22 This discussion is limited to the upper and lower plaza paving; it provides historical context and an assessment of integrity as background for paving recommendations. Guidance regarding other aspects of the Memorial building is being provided through other, concurrent, projects: Wiss, Janney, Elstner Associates, Inc. (WJE), Perry's Victory and International Peace Memorial (PEVI) Value Analysis Study for Determining Necessary Repairs to Restore Failing Upper Plaza (Denver CO: Denver Service Center, National Park Service, 2015); WJE, PEVI Repointing and Cleaning Trials, 2016; and WJE, PEVI Condition Assessment of Seawalls (Denver CO: Denver Service Center, National Park Service, 2016 draft.

23 Henderson, "Proposed Repaving of the Memorial Plazas," 15.

24 Henderson, "Proposed Repaving of the Memorial Plazas," 18.

25 Mongin, "A Construction History of the Perry's Victory and International Peace Memorial," 348-350.

26 It is common to use a vitrified brick laid on edge for high-traffic areas; the vitrifying process strengthens the brick; laying it on edge reduces the possibility of breakage. "Breaking joints" simply indicates installation of a running bond with care taken not to align any of the joints of the concentric rings of brick.

appropriate to the patriotic motif of the Memorial.”²⁷

Unfortunately, the sandstone deteriorated in the extreme weather of the site. During an extensive rehabilitation of the Memorial building in 1980-82, the bricks and sandstone pavers were removed and discarded. In 1981-82, the sandstone on the lower plaza was replaced with granite pavers by the NPS, and in 1983-84, the sandstone on the upper plaza replaced by the same (Figure 2-16). The pavers were chosen to match Freedlander’s 1914 design, installed in the 1920s.²⁸



Figure 2-16: Granite pavers installed by the NPS in 1983–1984. To the left is the scored concrete band installed to replace the brick in 2012. CHG

During the 1983–1984 rehabilitation campaign, the original red brick panels were also replaced, but with hollow core bricks instead of the vitrified bricks specified by Freedlander. The hollow-core bricks quickly deteriorated in the extreme climate of the site, and in the fall of 2012, they were all removed, along with most of the granite pavers, so that waterproofing could be repaired. A ring of concrete was poured to replace the ring of bricks as a temporary measure to provide safe public access around the column during the park’s 2013

Bicentennial celebration. The rest of the work area was covered with river rock ballast to discourage visitors from walking in the area.²⁹ Today, freestanding signs are positioned in these areas to warn visitors of the danger of walking on the uneven surface of the pebbles.

Update: The structure of the upper plaza is failing and will be replaced within the next decade. When this project is completed, the paving surface of the upper plaza will also be replaced. The treatment plan included in this report provides a concept for this paving.

Contributing: Granite coping around the plazas and the planters.

Noncontributing: Granite pavers, concrete band that replaced brick, replacement brick in brick accents, and river gravel.

Missing: Berea sandstone pavers.

Superintendent’s Residence (Men’s Dormitory)

The Neo-Colonial Revival-style Superintendent’s Residence, now the Men’s Dormitory for seasonal employees, has been modified only slightly since it was built in 1951. It remains in its original location and continues to function in its historic use as a residence; it is considered contributing to the integrity of the historic site.³⁰

Constructed along with the Superintendent’s Residence in 1951 was a small garage building. It was demolished after the end of the period of significance and a storage building was assembled in its place in 2012.

27 Harvey, “Perry’s Victory and International Peace Memorial Additional Documentation,” 7-16.

28 Williams, *Cultural Landscape Report*, 85-86.

29 “Basis of Design,” Sept. 14, 2015, memorandum from Wiss, Janney, Elstner Associates, Inc., to Rick Rampi, NPS Denver Service Center. Memorandum is a document associated with the Perry’s Victory and International Peace Memorial Value Analysis Study for Determining Necessary Repairs to Restore Failing Upper Plaza, 3.

30 Harvey, “Perry’s Victory and International Peace Memorial Additional Documentation,” 7-26.

Update: These buildings remain in the condition as recorded in the 2014 NRHP Additional Documentation.

Contributing: Superintendent's Residence (Men's Dormitory)

Noncontributing: Storage building

Missing: Superintendent's Residence garage

Ranger Operations Center (former Public Restroom, then Park Headquarters)

The Ranger Operations Center (ROC) was originally built in 1929 as a public restroom building. Although not a part of the original design for the Memorial, its presence reflects the need for public facilities at the time. After the public restrooms were added under the Memorial's upper plaza, the building was remodeled to house park headquarters, including the addition of the large window next to the front entrance on Delaware Street. An addition to the building was made in 1988, which doubled the size of the building. It is because of these changes that the building is not considered a contributing to the historical integrity of the site.³¹

Update: In 2017, the exterior wall shingles of the ROC were replaced with fiberglass shingles to match the originals. However, because of the previous additions, the ROC is still considered noncontributing.

Contributing: n/a

Noncontributing: Ranger Operations Center

Missing: Original form of building, fenestration, and shingles.

North and South Seawalls

The north and south seawalls were originally constructed in 1916. The north seawall was

reconstructed in 1934-35 as a federal public works project, and it was expanded in height and length in 1977. The south seawall was demolished in 1977 and complete rebuilt, with its eastern end angled further into the lake than the original to prevent erosion. Both seawalls are important features in the cultural landscape of the park because they mark the approximate boundary of the original historic site. However, because they were both reconstructed, they lack integrity to the period of significance and are considered noncontributing.³²

Update: Plans are underway to replace both seawalls.

Contributing: General locations of seawalls.

Noncontributing: North and south seawalls.

Missing: Original form of north seawall and original south seawall.

Views and Viewsheds

The Perry's Victory International Peace Memorial, including its formal grounds, was designed to be viewed principally upon approach on Put-in-Bay from the north, particularly from Gibraltar Island (see Figure 2-5). From there, one is presented with the illusion of the Memorial column rising directly from water surface and framed by masses of trees on the east and west. The open water on the Lake Erie side provides an unobstructed backdrop for this view. This view, as described in the 2014 NRHP Additional Documentation, maintains integrity of location, design, setting, feeling and association.³³

The designed view afforded by the observation platform near the top of the Memorial column to the location of the Battle of Lake Erie is an essential feature of the historic core. However, as described in the 2014 NRHP Additional Documentation, although the construction of new docks in Put-in-Bay to the west has somewhat

31 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 7-26.

32 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 7-14.

33 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 7-10, citing Williams, *Cultural Landscape Report*, 96.

impaired the foreground view, the overall intent to provide an overlook of the battle site is still discernable (Figure 2-17).³⁴

Update: When the visitor center was constructed in 2002, the designers placed it out of the historic views to the Memorial from both Delaware and Bayview avenues. Although its orientation is different than the historic orthogonal pattern of streets and buildings in that part of Put-in-Bay, its location does not diminish the integrity of the historic core.

Contributing: View from Gibraltar Island, view from the observation platform.

Noncontributing: n/a

Missing: Clear view from the observation platform prior to the construction of new docks in Put-in-Bay.



Figure 2-17: View of the western side of the battle area in Put-in-Bay, showing the intrusion of modern docks into the viewshed. CHG

Small-Scale Features

Small-scale features within the historic section of the park that survive from the period of significance with high integrity include the original granite benches and granite urns on the plazas, c. 1925. In addition, the placement of flagpoles in their current location is also a contributing characteristic of the historic core. One of the three

flagpoles, erected to hold the American flag, was installed in front of the Memorial in 1942, but in 1959, it was relocated to its approximate general location. It was joined by a second flagpole erected for the Canadian flag in 1975.³⁵

In 1928, the Memorial column was illuminated using three groups of eight floodlights each, attached to a single metal structure. Today's floodlights are single units set on large concrete footings in approximately the same location as the old lights; although these units are modern and not designed to look like the originals, their location is a contributing characteristic of the historic core.

The cylindrical brass lights on the plaza appear to have been placed there sometime between 1974 and 1994. Their simple form and materials are compatible with the Memorial, but, as the 1994 CLR points out, they do not reflect the level of workmanship shown in the original Memorial details.

A bronze pipe guardrail was installed in 1983-84 on top of the east wall of the upper plaza to protect the public from falling approximately fifteen feet to the restroom plaza. Two brass drinking fountains installed after 1963 are attached to the east retaining wall of the Memorial near the restrooms. Modern metal and plastic cylinder lights, also installed after 1963, are also mounted to the retaining wall. As determined by the 2014 NRHP Additional Documentation, all these features are non-historic.³⁶

Electrical utility boxes located in the historic core are also distracting elements in the historic landscape. One set is clustered on the east side of the memorial adjacent to the east retaining wall at the restroom plaza. While screened somewhat on the north side by the wall, this set of boxes and conduits distracts from the historic character of the Memorial when viewed from the east side. In addition, there are two free-standing sets of utility switch and control boxes located within the

34 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 7-11.

35 Williams, *Cultural Landscape Report*, 51.

36 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 7-17 and 7-18.

historic core: one stands at the northeast corner of the historic core, and the second stands between the flag poles and Bayview Avenue. Attempts have been made to mitigate their appearance by screening them with shrubs; however, the shrubs are rigorously clipped and supplemented with annual flowers, which only serves to draw attention to the utility boxes (Figure 2-18).

Update: In 2008, flagpoles for the American and Canadian flags were replaced with taller units, and the third added for the British flag. The British flag was flown at the park for the first time in 2009.³⁷ Trash containers placed in the historic portion of the park, including on the Memorial's upper plaza and right next to the south door of the column, are either double containers with one side for recycled materials, or large, square boxes with exposed aggregate sides, neither compatible with the historic character of the Memorial (Figure 2-19). In addition, the upper plaza of the Memorial is cluttered with 10-12 small signs mounted on concrete bases that warn the public about the instability of the gravel that was placed where there had been damaged sandstone pavers. These signs are a distracting element in the historic landscape but will be removed when the walking surface is stabilized after the reconstruction of the plaza in the coming years.

Contributing: Granite benches and granite urns on the upper plaza, and general location of flagpoles and floodlights.

Noncontributing: Trash cans, bike racks, signs, replacement floodlights, other lights, utility boxes, and 2008 flagpoles.

Missing: Original flagpoles and original floodlights.



Figure 2-18: Utility boxes surrounded by clipped shrubs, roses, and annual flowers. CHG



Figure 2-19: Trash and recycling receptacles located at the northwest corner of the Memorial's lower plaza. CHG

Setting

While not contained within the boundary of the historic site, the character of properties adjacent to the site is important as the setting for the Memorial. As described in the 1994 CLR, because of the removal of the wood frame houses and trees that stood in the block between Chapman and Toledo avenues, the historic spatial relationship between that block as a boundary and the historic core are no longer discernible.³⁸

The 2014 NRHP Additional Documentation comments that the loss of Chapman Avenue contributed to this issue.³⁹ It also determined that the new visitor center, while essential to the function of the park and not located within the

37 Personal communication from PEVI Maintenance Chief, Rodney Karr, 2017.

38 Williams, *Cultural Landscape Report*, 97-98.

39 Harvey, "Perry's Victory and International Peace Memorial Additional Documentation," 8-9.

historic core, is considered noncontributing to the historic site, and “especially with the loss of Chapman Avenue, impairs understanding of the original Memorial setting.”⁴⁰ Although the block between Chapman and Toledo avenues was considered for inclusion in the historic site, because of the removal of historic features and construction of new features that “obliterated the earlier configuration,” it was eliminated from consideration.⁴¹

The 2014 NRHP Additional Documentation also describes the new staff housing the maintenance facility on the east side of the park, constructed in the 1990s, as “stylistically incompatible with the Beaux-Arts design of the Memorial.”⁴² However, it was the intention of the designers of that complex to make them visually compatible instead with the adjacent neighborhood. In addition, the trees that mark the general area of the east boundary are still standing, and the housing and maintenance development has little effect on the integrity of the historic core.

Update: It is the intent of this cultural landscape treatment plan to address issues that inhibit an understanding of the original Memorial setting through the conceptual redesign of the visitor approach and through adding groupings of trees to replace those that once marked the boundaries of the historic core.

Contributing: Trees that mark the general area of the east boundary.

Noncontributing: Visitor center and associated features.

Missing: Wood frame houses and trees between Chapman and Toledo avenues, and Chapman Avenue, itself.

40 Harvey, “Perry’s Victory and International Peace Memorial Additional Documentation,” 8-95.

41 Harvey, “Perry’s Victory and International Peace Memorial Additional Documentation,” 8-95.

42 Harvey, “Perry’s Victory and International Peace Memorial Additional Documentation,” 7-9.

Chapter 3: Treatment Plan

Introduction

This treatment plan has been prepared to provide the Perry's Victory and International Peace Memorial (PEVI) staff and management team with an overall vision, along with guidance and support for long-term management and interpretation of the park and its resources. The plan is divided into five primary sections:

- 1) **Management Issues, Goals, and Objectives** describes the issues raised by the staff of Perry's Victory and International Peace Memorial for consideration within the treatment plan.
- 2) **Recommended Treatment Approach**, presents the four approaches recognized by the Secretary of the Interior for treating historic properties, and recommends an approach for the park that considers the overall vision for the property conveyed by park staff, stakeholders, and residents of South Bass Island.
- 3) **General Treatment Guidelines and Recommendations**, outlines an approach and method for addressing management issues and the implementation of treatment throughout the project area.
- 4) **Treatment Recommendations by Management Zones**, provide more specific, resource-based goals, arranged by management zone, which were delineated based on levels of historical integrity within the park landscape.

Management Goals

This cultural landscape treatment plan focuses on addressing specific management goals identified by PEVI staff and the National Park Service (NPS) in the project scope of work:

- Update treatment from a preservation approach to a rehabilitation approach that addresses current and future visitor needs;
- Guide replacement of the current temporary surface on the plazas and examine how to provide wheelchair access to the plazas;
- Direct vegetation replacement at the site, specifically the over mature Austrian Pines at the base of the Monument [Memorial building];
- Provide better integration of sidewalks and social trails within and connecting the designed landscape to the surrounding community;
- Examine methods to achieve sustainability goals for lighting and landscape maintenance;
- Increase understanding of the original commemorative design, and how the National Park Service has added interpretive and visitor amenities over time;
- Broaden the analysis of the Freedlander design within the context of Beaux Arts Movement; and
- Apply a consistent and intentional approach to design and maintenance, given that the site

presents inconsistent application of materials such as concrete, brass, and vegetation.

In addition, based on meetings with PEVI staff and members of the public, additional goals are:

- Develop conceptual alternatives for the Peace Garden and pedestrian circulation that connects it to the visitor center and Memorial.
- Ensure that new vehicular and pedestrian circulation features promote intuitive wayfinding and a clear hierarchy of movement for the visitor, particularly first-time visitors, from arrival, through the visitor center, to the Memorial;
- Accommodate visitor use within the historic core of the park, while complying with the Secretary of the Interior's Standards for Rehabilitation with Guidelines for the Treatment of Cultural Landscapes.
- Incorporate new visitor circulation features that preserve and enhance the Beaux-Arts design characteristics of the historic core while complying with the Architectural Barriers Act Accessibility Guidelines (ABAAS);
- Determine the appropriate materials for the renovation of the Memorial's upper plaza grass panels.
- Identify locations for programmable event spaces that offer an alternative to turf.
- Develop of a comprehensive approach to parking for both vehicles and golf carts.

Recommended Treatment Approach

The Secretary of the Interior currently recognizes four appropriate treatment alternatives for historic landscapes: preservation, rehabilitation, restoration, and reconstruction. These are defined and discussed in the NPS guidance document, Director's Order #28: *Cultural Resource Management Guidelines*, as well as The Secretary of the Interior's *Standards for the Treatment of Historic Properties* with *Guidelines for the Treatment of Cultural Landscapes*, as follows:¹

Preservation: the act or process of applying measures necessary to sustain the existing form, integrity, and materials of a historic property. Includes stabilization work, where necessary, as well as ongoing preservation maintenance and repair of historic materials and features.

Rehabilitation: the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values.

Restoration: the act or process of accurately depicting the form, features, and character of the property as it appeared at a particular period of time by removing features from other periods in its history and reconstructing missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

Reconstruction: the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object

1 Birnbaum and Peters, eds. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. Washington, DC: National Park Service, 1996.

for the purpose of replicating its appearance at a specific period of time and in its historic location.

Based on the park's need to meet current and projected-future functional, maintenance, and management goals, **rehabilitation** is recommended as the overarching approach to resource management at Perry's Victory and International Peace Memorial. Because rehabilitation is defined as "the act or process of making possible a compatible use for a property," this approach will allow for the expansion of visitor circulation and use areas, replacement of historic landscape features, addition of features to enhance accessibility, and enhancement of interpretive opportunities, with care taken to preserve and protect the character-defining features of the historic core.

Rehabilitation also includes stabilization, protection, and preservation of historic resources. As part of the treatment recommendations, those resources and systems at PEVI that are particularly sensitive to change and disturbance, and well-suited to stabilization, protection, and preservation are noted.

The ten basic principles that comprise the Secretary of the Interior's *Standards for Rehabilitation* are intended to help preserve the distinctive character of a site, while also allowing for reasonable change to meet new needs. The standards create a baseline of guidance to which intended changes to the historic landscape must be compared. These standards are neither technical nor prescriptive, but promote responsible preservation practices, as follows:

- A property will be used as it was historically, or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
- The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
- Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- Changes to a property that have acquired historic significance in their own right will be retained and preserved.
- Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic

property and its environment would be unimpaired.²

Treatment Guidelines and Recommendations

These recommendations and guidelines are arranged into two sections. The first, Site-Wide Recommendations, sets out general guidelines that apply to the entire park property and is arranged by categories that address overall issues and concerns. The second section, Treatment Recommendations by Management Zone, is organized by the management zones as defined below.

Site-Wide Recommendations

The overarching treatment recommendations and guidelines that follow pertain to the park as a whole and should be referenced when planning for any future landscape change. They are intended to support all landscape treatments proposed in this report and should be considered in conjunction with any project or treatment alternative undertaken within the park.

Land Use

- Consider equally the effect on both cultural and natural features in treatment and land-use decisions;
- Monitor and regulate current use of the landscape to minimize any long-term damage to cultural and archeological resources;
- Avoid introducing land-use activities, either permanent or temporary, that threaten or impair known or potential archeological resources; and
- Limit, monitor, and control access to areas that are susceptible to damage from human access or use, particularly vulnerable

ecological areas, including the shoreline of the park and the ends of the seawalls.

- Consider the Memorial's relationship to neighboring property owners in making treatment decisions as well as views of the local community and historic groups.

Buildings and Structures

- Remove non-contributing buildings and structures only if they have a negative impact on the historic character and integrity of the park landscape, or are in poor condition and cannot be reasonably repaired;
- Document thoroughly all buildings and structures before removal in photographs, drawings, and narrative description; and
- Retain the integrity and form of the Beaux-Arts design for the Memorial building and grounds. Evaluate the adaptability and compatibility of additions to structures.

Circulation

- Minimize the visual impacts of new vehicular and pedestrian access systems, including roads, drives, parking areas, and walkways, considering the potential impact on historic views to the Memorial;
- Conduct archeological research and investigations prior to any sidewalk or plaza construction to mitigate its potential effect on sub-surface resources;
- Encourage pedestrian access from the village center and throughout the park site as an alternative to golf carts. Work with village officials to create off-site overflow vehicular and golf cart parking for special events; and
- Retain the integrity and form of the formal, Beaux-Arts design for the Memorial building and grounds, and evaluate the adaptability and

² Birnbaum, 49.

compatibility of additions or changes to pedestrian or vehicular circulation systems.

Rare, Threatened, and Endangered Plant and Animal Species

- Contact the U.S. Fish and Wildlife Service, Ohio Field Office to verify the presence of any rare, threatened, and endangered plant and animal species in the park, and its ecological context of Lake Erie and Put-in-Bay;
- Evaluate recommendations affecting endangered or threatened plant or animal species prior to undertaking any construction or vegetation removal project.³
- Avoid disturbing existing vegetation communities and water resources known to support populations of endangered or threatened species.
- Minimize areas of ground disturbance, earth grading and compaction, and drainage pattern alteration in the vicinities of populations of endangered or threatened species.
- Limit, monitor, and control access to vulnerable ecological areas that are susceptible to damage from human access or use.
- Encourage best management practices for vegetative land cover, pest control, and erosion control measures in all maintenance and management practices, to minimize water pollution and degradation of natural systems for the protection of vulnerable species.

Sustainability

- Institute cultural and natural resource treatment and maintenance methods that are environmentally and culturally sensitive, and sustainable over the long term.

- Minimize grading, soil compaction, and alterations to natural drainage patterns.
- Promote biodiversity through use of native and/or naturalized, non-invasive plant species in new plantings.
- Consider life-cycle costs of materials for new designs, including long-term wearing capacity and maintenance. Use materials that are non-toxic, durable, and low-maintenance.

Topography

- Minimize soil disturbance and grading in areas of high historical integrity, unless absolutely necessary, and only after an archeological investigation has been conducted.
- Preserve existing landforms and natural drainage patterns to the greatest extent possible.
- Avoid attempts to reconstruct or restore historic grades unless supported by clear documentary evidence showing how they appeared at a specific period or as intended by an original constructed design.

Small-Scale Features

- Develop a site furnishings guide that identifies appropriate, compatible designs for benches, trash receptacles, and all sign types to be used consistently throughout the park. Furnishings would be compatible within all management zones of the park. Their design and materials would not distract from the character of the historic core and would not diminish its integrity. Bench example shown below is constructed of wood and aluminum (Figure 3-1). The wood would fade to pewter gray over time and not require maintenance. The trash receptacle is aluminum and unobtrusive

3 Evaluation of the treatment alternatives in the environmental assessment will include impact analysis for rare, threatened, or endangered plant and animal populations.



Figure 3-1: Benches would be compatible within all areas of the park.

(Figure 3-2). Products are available through Land Form outdoor furniture.



Figure 3-2: Trash receptacle is not visually intrusive and is compatible through the park.

Vegetation Management

- Develop a landscape preservation maintenance plan that preserves the historic character of the park by identifying a planting and replacement policy for trees and shrubs that contribute to the significance of its historic core. Identify the goals for tree and shrub plantings so that species substitutions can be made should conditions change, and a list of appropriate native and/or naturalized, non-invasive tree species to be used for planning and replacement to meet the goals identified. Appropriate species are those that can be maintained in current and anticipated future climate and soil conditions.

- Identify as closely as possible the historic character of areas under consideration for new development before removing any vegetation, to ensure that its removal and/or replacement is consistent with an accurate portrayal of historic conditions.
- Remove, when necessary, existing trees, using methods that minimizes the potential impacts on known and potential cultural and archeological resources. Undertake tree removal from areas with known or potential cultural and archeological resource under the guidance of an archeologist.
- Consider the impact on topography and soil stabilization if vegetation is removed, including what protection the vegetation may provide to buildings, structures, and other sensitive resources.
- Remove dead trees and shrubs, and those identified as potentially hazardous to individuals or resources due to their health or condition and replace as recommended.
- Consult with a natural resource specialist prior to removing any vegetation to determine the value or role of the vegetation in protecting existing landforms, providing habitat for rare, threatened, or endangered plants or wildlife. Consider the effect that removal may have on storm impacts.
- Remove invasive plant species using ecologically-sound removal techniques.

New Design and Construction

- Avoid adding new features or altering existing features in ways that adversely affect the landscape's historic character. New construction should be limited to those alterations and additions that are necessary for ABAAS-compliant accessibility, and the comfort and safety of visitors to the park. Changes affecting historic features should be implemented based on the Secretary of the Interior's *Guidelines for Rehabilitation*, while allowing for accessibility and safety.

- Undertake sufficient study and recordation of landscape features requiring modification, repair, or replacement before work is performed, to protect research values.
- Retain the integrity and form of the formal, Beaux-Arts design for the Memorial and grounds and evaluate adaptability and compatibility of additions or changes to historic structures and the cultural landscape.

Role of Preservation Specialists

- Undertake all treatment projects under the direction of appropriate specialists, including historical landscape architects, historical architects, archeologists, natural resource management specialists, and qualified technicians and artisans.

Documentation

- Document, through drawings, photographs, and notes, all changes and treatments. Maintain records of treatments and preserve documentation according to professional archival standards. Documentation will be maintained as records at PEVI and all information within this document will be stored and can be accessed via eTIC and other websites.

Treatment Recommendations by Management Zone

This section provides a resource-driven approach to the treatment of each of three management zones, with specific recommendations that respond to the management goals identified above. The management zones are sub-areas of the site that encompass groups of features with similar levels of historical significance and integrity, and specific land uses. The recommendations for each management zone provide a specific framework, approach, or strategy for treatment for each distinct sub-area. Graphics, including treatment plans and photographs that illustrate the recommendations for each management zone, are referenced in the text as appropriate.

Zone 1: Historic Core

Refer to Figure 3-3: Management Zone 1

This management zone constitutes the historic core of Perry's Victory and International Peace Memorial, which contains all the contributing features of the park. The historic core is defined as that area contained within the NRHP site portion of the park, or, the original 14.5 acres. It exhibits high integrity, and its protection and use require coordinated management with the changing landscapes in Zones 2 and 3.

The vision for the treatment of this zone is to preserve and enhance its historic character to best communicate to visitors the commemorative story of the park and its mission of international peace. The treatment recommendations include preserving contributing landscape features; replacing missing features; and repairing, restoring, or enhancing contributing landscape characteristics that have been negatively impacted by erosion or loss. In addition, the vision also includes removing incompatible noncontributing features and, if necessary, installing replacements that are visually compatible.

The contributing landscape features in the historic core, as discussed in Chapter 2 include:

- Level topography of the ground plane;
- Raised upper and lower plazas;
- Sloping berms that support the plazas;
- Beaux-Arts style design of the Memorial and grounds around the single focal point of the column and the axial symmetry of the composition;
- Expanse of open turf on either side of the Memorial building that focuses visual attention on the column;
- Clusters of vegetation east and west of the Memorial that frame the Memorial building and grounds composition;

Treatment Plan

- Bayview and Delaware avenues, and the trace of Chapman Avenue;
- Diagonal sidewalks that transverse the historic grounds, the short sidewalk connecting the west diagonal walk to the lower plaza, the sidewalk along Bayview Avenue, the sidewalk from the lower plaza to the restroom plaza; and the stairs to the lower plaza;
- Mature trees, which predate 1912, on the eastern boundary of the historic core, and the locations of the four replacement Norway maples;
- Austrian pines around the Memorial and sloped plazas;
- Memorial building, including the upper and lower plazas, and the Memorial column;
- Superintendent's Residence, still used as a dwelling;
- Locations of north and south seawalls;
- Views to the column from the lake on the north and from Gibraltar Island and from the column's observation platform to the location of the 1813 Battle of Lake Erie;
- Planters on the upper plaza;
- Granite urns on the plazas (4);
- Granite benches (9); and
- General location of flagpoles and floodlights.

Specific objectives for rehabilitation of the historic core are to:

- Preserve and enhance the character of the form and fabric of the formal Beaux-Arts design of the Memorial building and its associated landscape;
- Manage and maintain vegetation in a way that protects the historic character of Perry's Victory and International Peace Memorial;

- Preserve, repair, restore, and conserve granite and other hard materials associated with the Memorial building and grounds, including its plazas, urns, benches, sidewalks, and other features; and
- Enhance the visitor experience, emphasizing and integrating the landscape into the interpretation of the park, affording a deeper understanding of its significance.

The recommendations presented below by landscape characteristic help support these objectives.

Natural Systems

- Control stormwater run-off from any new impervious surfaces introduced into the historic core, directing run-off into low-use areas away from historic resources.
- Protect all water resources adjacent to the historic core, especially Lake Erie and Put-in-Bay, from any chemical pollution or siltation associated with changes to the site.

Land Use

- Manage and maintain the historic core as a cultural resource.
- Manage and maintain the historic core for visitor use and experience including passive recreation, interpretation, and contemplation.
- Avoid introducing new land uses within the historic core.
- Restrict, except for the Superintendent's Residence (Men's Dormitory) and the Ranger Operations Center, residential and park administration land uses to Zones 2 and 3.

Topography

- Minimize soil disturbance and grading as much as possible when introducing new site developments such as parking, pedestrian circulation, and interpretive waysides into the landscape;

Perry's Victory and International Peace Memorial

0' 80' 160'

SCALE 1" = 160'

Data Sources: Base map based on GIS shapefiles provided to the authors by NPS and supplemented through with aerial photography and other NPS maps

- Avoid altering the flat landform of the historic core;
- Preserve, manage, and maintain the berms around the upper and lower plazas and maintain under vegetative cover to prevent erosion and damage from visitor activity. See the section below concerning vegetation.

Spatial Organization

- Preserve, manage, and maintain the patterns of open and enclosed space in the historic core, defined by the flat topography, plazas, and water surfaces to each side of the Memorial, and by the enclosing vegetative masses on the eastern and western edges of the Memorial grounds.
- Preserve, manage, and maintain the balance of spaces or features in the historic core, specifically the balanced and symmetrical lawn to each side of the Memorial. This balance is a typical feature of the Beaux-Arts style.
- Strengthen the masses of trees on the eastern and western edges of the Memorial grounds to enhance their function as a frame for the Memorial (Figure 3-4 and 3-5).

Views and Vistas

- Manage and maintain the views of the Memorial column within the historic core by keeping plantings in designated areas and avoiding the addition of permanent structures in the historic core.
- Manage and maintain the views of the historic core from the approach on Lake Erie from the north, Put-in-Bay from the south, and from the eastern end of Gibraltar Island. Within this management approach, the park staff would also monitor viewsheds to neighboring islands and the mainland to the south and identify potential visual impacts of new development within viewing distance from the park.
- Manage and maintain the view from the observation deck of the Memorial column.



Figure 3-4: Tree massing has diminished over time along the eastern edge of the historic core. CHG



Figure 3-5: Tree massing would be augmented along the western edge of the historic core. CHG

The view outward toward the site of the 1813 Battle of Lake Erie is critical for interpretation.

- Provide programmatic accessibility in association with interpretation of the view from the observation deck. Refer to NPS

Preservation Brief 32: “Making Historic Properties Accessible.”

- Place above-ground utility box located east of the Memorial in an underground vault, if feasible, and the one located west of the Memorial in a location outside the historic viewshed, and screen, if necessary, using evergreen shrubs. Consolidate utility boxes on the east side of the Memorial and place in an underground vault in the berm, if feasible.

Circulation

- Ensure for all visitors, equal access to the Memorial plaza by providing wheelchair access to the upper and lower plazas in compliance with ABAAS standards. For the lower plaza, construct two ramps on the north side, one east and one west, to retain the symmetry of the original design while allowing easy accessibility to the lower plaza from both directions. For the upper plaza, provide direct connection from the lower plaza via a ramp system centered on the upper plaza stairs. Refer to NPS Preservation Brief 32: “Making Historic Properties Accessible.”
- Remove the parking area north of the Memorial and reuse the space as a pedestrian plaza and landing for the ramps to the lower plaza.
- Construct new angled parking for vehicles and golf carts along Bayview Avenue east and west of the Memorial. Ensure that an appropriate number of these spaces are accessible and have walkways that lead to the Memorial and connect with existing pedestrian circulation within the historic core. Ensure that this parking and related pedestrian crossings do not impede the flow of traffic along Bayview Avenue.
- Manage and maintain the existing diagonal sidewalks and the sidewalk adjacent to the south seawall (Figure 3-6 and 3-7).
- Provide a pedestrian sidewalk along the north seawall. This walkway should continue along



Figure 3-6: Diagonal sidewalks flanking the Memorial would remain, within a rectilinear circulation pattern. *CHG*

the seawall east and west in association with Zones 2 and 3 (Figure 3-8).

- Consider changes to pedestrian circulation within the historic core with the goal of integrating the landscape into the overall



Figure 3-7: Sidewalk adjacent to the south seawall would remain. *CHG*



Figure 3-8: Sidewalk adjacent to the north sidewalk would be provided. *CHG*

visitor experience by providing interpretive waysides that offer opportunities for a more comprehensive understanding of the site and its history.

- Design the circulation system within the historic core to comply with ABAAS standards. Refer to NPS Preservation Brief 32: “Making Historic Properties Accessible” and the 2018 Accessibility Plan for the park.
- Provide pedestrian connection to the town beach from the park with discreet signage and expansion of the sidewalk within the park to the edge of the beach property.

Vegetation

- Preserve, manage and maintain the mown turf that forms the setting for the Memorial and supports the integrity of the designed historic landscape (Figure 3-9).



Figure 3-9: Management of the large expanses of turf will continue with the current turf management and maintenance program. *CHG*

- Add native trees along the east and west boundaries of the historic core to reinforce the sense of spatial enclosure and create a permeable transitional edge compatible with the original design intent (Figure 3-10).⁴ The



Figure 3-10: Additional trees would be provided along the western edge of the historic core to reinforce historic spatial organization. *CHG*

Lake Erie Islands Conservancy sells native trees that survive the island weather. Recommended species from this list include: swamp white oak (*Quercus bicolor*), burr oak (*Q. macrocarpa*), chinquapin oak (*Q. muehlenbergii*), basswood (*Tulia americana*), common hackberry (*Celtis occidentalis*), black cherry (*Prunus serotina*), and cottonwood (*Populus deltoides*).⁵ An excellent source that lists native trees of South Bass Island is *Flora of the Erie Islands: Its Origin, History and Change* which identifies the Sugar Maple/Common Hackberry association of species as dominant on the island. This association includes, in addition to the species listed above, silver maple (*Acer saccharinum*), box elder (*A. negundo*), sugar maple (*A. saccharum*), shagbark hickory (*Carya ovata*), white ash (*Fraxinus americana*), green ash (*F. pennsylvanica*), blue ash (*F. quadrangulate*), honey locust (*Gleditsia triancanthos*), Kentucky coffee tree (*Gymnocladus dioicus*), Eastern red cedar (*Juniperus virginiana*), black walnut (*Juglans nigra*), American hophornbeam (*Ostrya virginiana*), chokecherry (*Prunus virginiana*), hop tree (*Ptelea trifoliata*), white oak (*Quercus alba*),

4 For this area, Freedlander’s original design included a mixture of large deciduous trees and some flowering trees, but because of reduced construction funds, in the end, Freedlander had to rely on the preservation of certain large deciduous trees in both areas to accomplish his goal of enclosure.

5 “LEIC-BSC Native Tree & Plant Sale Order Form,” <http://lakeerieislandsconservancy.org/wp-content/uploads/2015/03/LEIC-BSC-Order-Form-Final-2015.pdf>; accessed February 12, 2018.

Treatment Plan

red oak (*Q. rubra*), American elm (*Ulmus americana*), and slippery elm (*U. rubra*).⁶

- Retain and maintain, in consultation with an arborist or urban forester, the existing Austrian pines until their removal in conjunction with the rehabilitation of the Memorial plazas.
- If desired, replace the Austrian pines, once the upper plaza rehabilitation project is complete, with the same species, maintained in a clipped, conical shape. Or, if an alternative is preferred, other trees with approximately the same size and habit include dwarf white spruce (*Picea glauca* 'North Star'), dwarf Alberta spruce (*P. glauca* 'Conica'), dwarf scotch pine (*Pinus sylvestris* 'Glaucia Nana'), and dwarf hemlock (*Tsuga canadensis*, 'Pendula' or 'Slenderella').
- Consider planting low evergreen shrubs or hardy ground covers on the berms as an alternative to sod to prevent erosion and damage from visitor activity on the steep slopes. Shrubs and or groundcovers should be low growing and compact, easily maintained, adaptable to the unique challenges of the island environment and weather conditions, and available from regional plant nurseries. Recommended species that would protect the berm from erosion and damage include:
 - Sweetfern (*Comptonia peregrina*): This plant is neither sweet or a fern but hardy in Zone 6a. It is salt, wind, and cold tolerant and survives well in nutrient poor soils. If it gets too tall it can be clipped to size or even mown once in late winter.
 - Bearberry (*Arctostaphylos uva-ursi*): The plant is a low growing and glossy-leaved evergreen that forms a broad, thick mat and is sturdy and reliable.
 - Cotoneaster (*Cotoneaster dammeri*) 'Lowfast' or 'Moonbeam'. This is a simple and low evergreen cover with lustrous dark green leaves. It will cover a large area in a short period of time and is excellent on slopes and banks.
- Retain planting beds on the upper plaza in turf, reflecting Freedlander's original specifications (Figure 3-11).



Figure 3-11: Planting beds on the upper plaza would be retained in turf. CHG

- Restrict the planting of annual flowers, which were not part of the planting palette during the period of significance, to Zones 2 and 3.
- Preserve trees within the historic core with a caliper equal to or greater than 3 inches as potential roosting habitat for the Indiana bat and the northern long-eared bat. If removal of trees this size or greater cannot be avoided, it should occur only between October 1 and March 31.

Buildings and Structures

- Preserve, manage and maintain the Memorial column and its supporting plazas and stairs as cultural resources. Refer to ABAAS

⁶ Thomas Duncan and Ronald L. Stuckey, *Flora of the Erie Islands: Its Origin, History and Change* (n.p.: lulu.com, 2010); 102-103.

accessibility standards in the Circulation section.

- Replace the cameras that were once located at the top of the Memorial column and provided a 360-view of the lake and bay for programmatic accessibility from the visitor center.
- Rehabilitate the upper plaza paving in granite and brick, based on the original Freedlander colors, but replacing the Berea sandstone with granite that matches the approximate color. Refer to Chapter 2 for a complete description of the original color scheme.
- Preserve, manage, and maintain the Superintendent's Residence (now the Men's Dormitory) as a cultural resource (Figure 3-12).



Figure 3-12: Superintendent's Residence would be managed as a cultural resource. *CHG*

Small-Scale Features

- Preserve, maintain, and manage contributing small-scale features associated with the Memorial, including the nine granite benches, four large granite urns, and the general locations of the floodlights and flagpoles (Figures 3-13 through 3-15).
- Remove non-contributing trash containers, bicycle racks, and light fixtures on and close to the Memorial building. Replace trash containers and bicycle racks with those of compatible design and relocate them to the periphery of the main historic viewshed from



Figure 3-13: Four granite urns on the upper plaza corners would be managed and maintained as cultural resources and part of the Memorial structure. *CHG*



Figure 3-14: Granite benches on the upper plaza would be managed and maintained as cultural resources. *CHG*



Figure 3-15: Flagpoles would remain in their existing location. *CHG*

the north. If trash collection on the upper plaza is absolutely necessary, place trash containers on the south side of the Memorial column, out of the main viewshed.

Zone 2: Visitor Access and Park Administration

Refer to Figure 3-16: Management Zones 2 and 3

This management zone functions as the primary area for visitor services and park administration. It provides a transition between the town center and ferry dock on Put-In-Bay, and the historic core of the park. Local roads providing access to PEVI form the north, east, and west boundaries of this zone and it shares its east boundary with Zone 1. Zone 2 provides vehicular and pedestrian access to the park, including the visitor drop-off at the visitor center and a small amount of associated parking. One portion of this zone, set aside to become the new Peace Garden, extends northwest from Toledo Avenue to Hartford Avenue, providing access to PEVI from DeRivera Park in the town center and the Put-In-Bay dockmaster, accommodating visitors arriving by foot and by ferry and boat.

Features of this zone include the park visitor center with a vehicular drop-off and parking accessed from Delaware Avenue; park headquarters; sidewalks; park interpretation and identification signs; benches and trash/recycling receptacles; path and overhead lighting; scattered shade trees; planted beds of shrubs, annuals, and perennials; and HVAC equipment.

The vision for the treatment of this zone is to provide a gateway that will attract and accommodate visitors to the Memorial through inviting and intuitive wayfinding that emphasizes an approach to the Memorial through the visitor center. Visitors should be attracted to the site first by the view of the Memorial from afar, but as they approach the park, they should be drawn to explore the visitor center and learn about the Battle of Lake Erie and the construction of the Memorial before approaching the Memorial building and ascending to the observation deck.

The rehabilitation approach for these recommendations will accommodate improvements to visitor access to the park and visitor center, expanded interpretation, and new circulation patterns and waysides. The proposed

treatment includes the integration of the visitor experience and interpretation in the landscape of the Peace Garden as a welcoming transition area from the town center to the park. The Peace Garden will provide a sense of entry, and clear orientation and direction to the historic core.

Natural Systems

- Control stormwater run-off from any new impervious surfaces introduced into this zone. Use grass swales, planted filter strips, and other environmentally preferable means for reducing runoff and pollution and promoting stormwater infiltration on-site. Development of the Peace Garden creates an opportunity to utilize and display to the public innovated stormwater management best-management-practices (BMPs).
- Protect all water resources, especially Lake Erie and Put-in-Bay, adjacent to this zone, from any chemical pollution or siltation associated with changes to the site.
- Retain and protect the plant communities associated with the shoreline and the north seawall that provide critical bird and wildlife habitat.

Land Use

- Manage and maintain current land uses for park access, enhancement of the visitor experience, expanded interpretation, opportunities for contemplation, and park administration.
- Develop the open landscape between Hartford Avenue and Toledo Street as a Peace Garden, providing a transition to the park from the town center and the opportunity for expanded interpretation and contemplation for visitors (Figure 3-17).

Spatial Organization

- Design the Peace Garden to function as a physical and visual connection from the edge of the town center at Hartford and Bayview, across Toledo Avenue, to the visitor center

**Environmental Assessment
and Cultural Landscape
Treatment Plan**

for

**Perry's Victory and
International Peace
Memorial**

November 2018

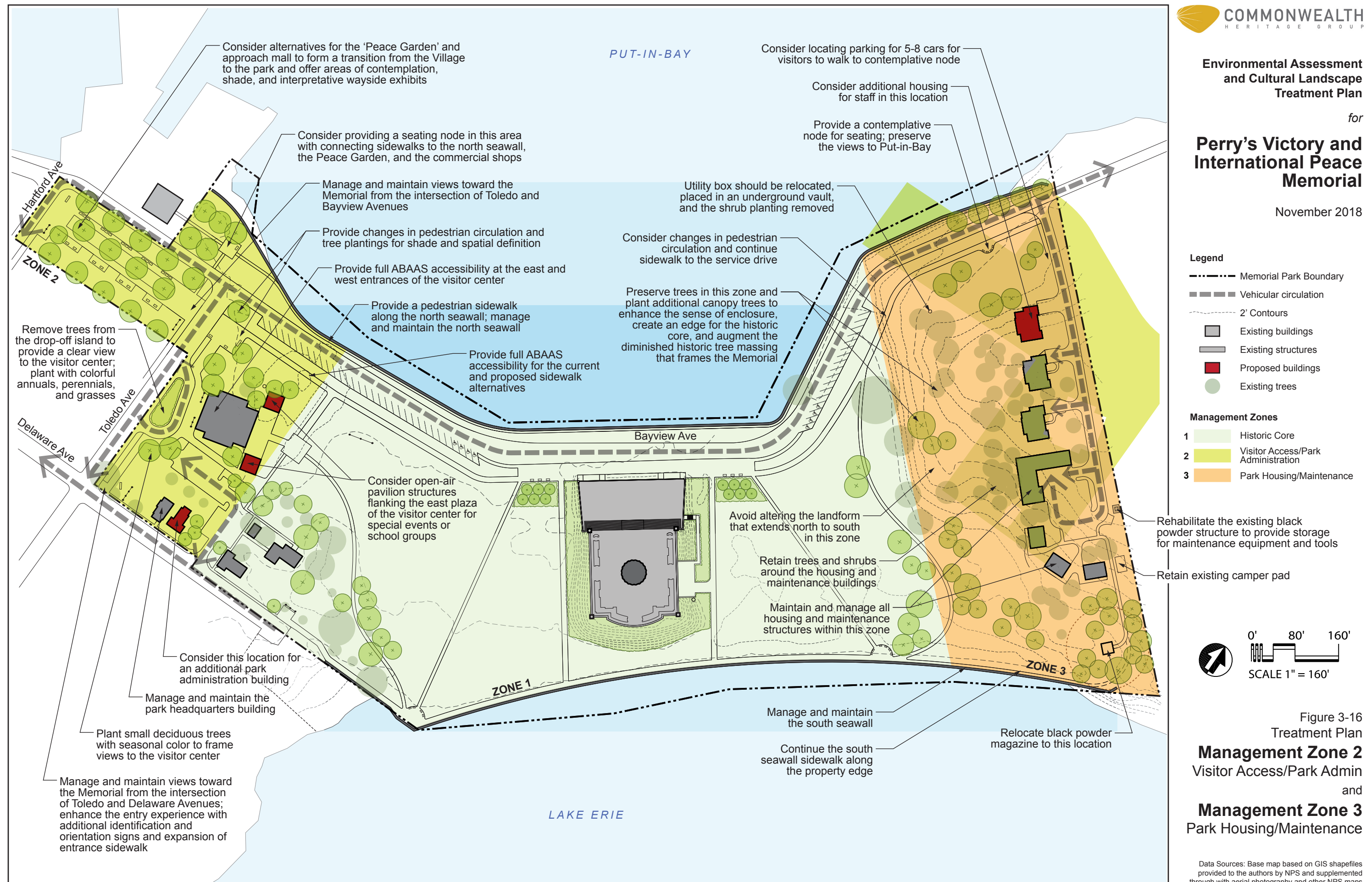


Figure 3-16
Treatment Plan
Management Zone 2
Visitor Access/Park Admin
and
Management Zone 3
Park Housing/Maintenance

Data Sources: Base map based on GIS shapefiles provided to the authors by NPS and supplemented through with aerial photography and other NPS maps



Figure 3-17: The open grass lot between Hartford and Toledo Avenues would be the location of the Peace Garden. *CHG*

and, eventually, to the historic core. The Peace Garden would be a designed open space that provides pedestrian access to the park, and opportunities for interpretation and contemplation. Orientation plazas would be incorporated in association with the visitor center as nodes for orientation and direction to the entrance of the visitor center (Figure 3-18).

- Incorporate the land owned by the park north of Bayview Avenue at the intersection with Toledo Avenue into the park experience. Provide pedestrian access and a shaded seating area adjacent to the Dairy Isle ice cream shop west of the park boundary.



Figure 3-18: The location of the Peace Garden would provide a visual and physical connection to the visitor center from Hartford Avenue. *CHG*

Views and Vistas

- Eliminate visual distractions that impair the view to the Memorial column by burying overhead utility lines along Bayview Avenue within the park. This is especially critical for the visitor experience when accessing the park through the proposed Peace Garden and for preserving the historic viewshed from Bayview Avenue.
- Manage and maintain views and vistas to the Memorial column from the intersection of Delaware and Toledo avenues for clear and intuitive wayfinding.
- Manage and maintain views and vistas to the Memorial from the Peace Garden to the intersection of Bayview and Toledo avenues and the expanded orientation plaza near the visitor center.

Circulation

- Provide ABAAS-compliant sidewalks throughout this management zone.
- Provide ABAAS-compliant parking that connects with accessible pedestrian circulation. Accessible parking should also be provided on Hartford Avenue near the entrance to the Peace Garden.
- Provide a pedestrian sidewalk along the north seawall within this zone, connecting to the seating node north of Bayview Avenue. This sidewalk should continue west along the seawall as it passes through Zones 1 and 3.
- Match, for new sidewalks, the finish of the existing sidewalks within the historic core.

Vegetation

- Remove the multi-trunked river birch trees in the turnaround island in front of the visitor center and replace with low plantings to allow the park sign and the front door of the visitor center to be fully visible (Figure 3-19).
- Renovate the evergreen shrubs around the visitor center so that they are allowed to grow



Figure 3-19: River birch trees would be removed to open the viewshed to the visitor center entrance.

CHG



Figure 3-20: Evergreen shrubs adjacent to the visitor center would not be sheared into geometric shapes.

CHG

in a natural style (Figure 3-20). The shrubs should be renovated by a trained horticulturist and maintenance staff trained in the proper way to prune. Do not shear.

- Install trees in association with the Peace Garden for shade and definition of nodes of interpretation and contemplation, along circulation routes throughout the zone to provide shade and frame vistas to both the visitor center and the Memorial, and in association with the visitor center to shade parking and define outdoor spaces. Refer to list of trees provided in the vegetation section for Zone 1. Tree selection and placement should be designed by a landscape architect, depending on the proposed location and function of the tree.

- Continue to follow management guidelines currently being used for the park's turf management plan.
- Preserve trees within this zone with DBH equal to or greater than 3 inches. These trees should be saved as potential roosting habitat for the Indiana bat and the northern long-eared bat. If removal of trees of this size or greater cannot be avoided, removal should occur only between October 1 and March 31.

Buildings and Structures

- Provide ABAAS-compliant access to and from the visitor center at all public entrances and exits (Figure 3-21).
- Provide at least one open-air pavilion for special event use and a place for gatherings as an alternative to events being held in turf areas, which must then be rehabilitated, and which may not be accessible to wheelchair users. The structure should have electricity for special permit events, such as weddings, graduations, and other reserved private events. Location should be sensitive to viewsheds and avoid intrusion into the historic core.
- Manage and maintain the park headquarters building and expand as recommended.
- Provide a new building for park administration adjacent to the park headquarters building and connect to the existing building as needed. For the new



Figure 3-21: West façade entrance to the visitor center is not compliant with ABAAS standards. CHG

building, maintain architectural scale, design, and materials that reflect the character of the existing small buildings within the park and their surrounding town context.

- Manage and maintain the north and south seawalls until such time it is renovated or replaced.

Small-Scale Features

- Simplify the design and arrangement of small-scale features in the landscape around the visitor center, the drop-off, and associated parking, including bollard lights, tree stakes, trash and recycling containers, freestanding planting pots, and non-park-purpose-related memorials and signs, to reduce wayfinding confusion and clarify the hierarchy of circulation through the site (Figure 3-22).
- Replace bollard lights with low path lights spaced 10 to 15 feet apart, which create pools of light that guide the pedestrian from one point to the next. Consider staggering the lights on each side of the path to provide overlapping pools of light. Set the lights slightly back from the walkway and out of accessible routes and ensure that the fixtures direct light toward the feet instead of upwards (Figure 3-23).
- Remove the monument to the Grand Lodge of Ohio from the turnaround island and display in the visitor center (Figure 3-24). Refer to recent information and recommendations for placement of small memorials and commemorative features within park boundaries. (National Capitol Planning Commission 2018, “Balancing Commemorative Works Within Parks”).
- Simplify and enhance the park entrance area along Toledo Avenue to direct visitors to the visitor center.

Zone 3: Park Housing and Maintenance

Refer to Figure 3-16: Management Zones 2 and 3



Figure 3-22: Small-scale features in the vicinity of the visitor center would be reduced and organized to prevent visual clutter. CHG



Figure 3-23: Bollard lights associated with the visitor center would be replaced with low path lights spaced 10 to 15 feet apart. CHG



Figure 3-24: The Grand Lodge of Ohio Monument would be displayed in the visitor center. CHG

This management zone forms the eastern portion of the park and contains staff residences, storage associated with interpretation, the black powder

magazine, collections, and a maintenance facility.⁷ Most features in this zone are located on a plateau formed atop a small knoll that extends north to south at its western edge; the zone has the highest elevations within the park. There are numerous trees within this zone that continue to fulfill the goals for the landscape design of 1924, which included using masses of trees along the east boundary to create an enclosed space that framed the horizontal planes of the plazas and lawns. Although none of the trees date to the period of significance for the historic site, the pattern of masses of trees intended to frame the view of the Memorial remains somewhat discernable.

Features of this zone include the combined maintenance/collections/storage facility, one- and two-story residential structures to house staff, a centralized parking area, and a driveway that extends from Bayview Avenue. These features sit atop a low plateau that rises above the flat, open grounds of Zone 1. Structures include a low-walled concrete block structure used to store black powder for living history demonstrations, a dumpster with a wood screen, utility boxes, and a concrete pad for trailer parking. An expanse of mowed lawn with scattered trees extends from the building cluster. Associated with the residences are scattered ornamental trees and shrubs, and planted beds of annuals and perennials.

The vision for the treatment of this zone is to support staff needs for housing and efficient maintenance and management of the park. The rehabilitation approach will accommodate necessary improvements to existing facilities and or the addition of new structures for staff housing, interpretation storage, maintenance bays and storage, and black powder storage.

Overall management goals for this zone that support this vision include the addition of a separate structure for black powder storage located at least 75 feet from occupied buildings, a separate storage facility for interpretive equipment and tools, and additional staff housing. Other

management goals include the maintenance of the expanse of lawn that covers most of this zone and the stands of trees that contribute to the definition of the east boundary of Zone 1.

Natural Systems

- Control stormwater run-off from any new impervious surfaces introduced into this zone using grass swales, planted filter strips, and other environmentally preferable means for reducing runoff and pollution and promoting stormwater infiltration on-site.
- Protect all water resources, especially Lake Erie and Put-in-Bay, adjacent to this zone, from any chemical pollution or siltation associated with changes to the site.
- Retain and protect the plant communities associated with the shoreline and the north and south seawall which provide critical bird and wildlife habitat.

Topography

- Minimize soil disturbance and grading when introducing new site developments such as parking, pedestrian circulation, and new structures.
- Avoid altering the landform of the rolling landscape within this zone. Most features in this zone are located on a plateau formed atop a small knoll that extends north to south at the western edge of the management zone. The zone has the highest elevations within the park (Figure 3-25).

Land Use

- Manage and maintain land uses for maintenance, housing, storage, and large vehicle parking.

⁷ The park collections are to be moved to a mainland location in the future.

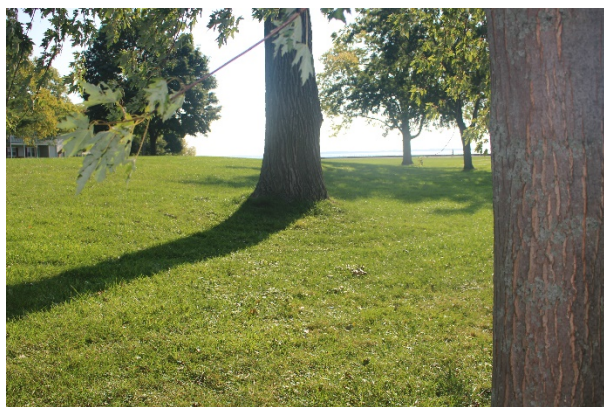


Figure 3-25: Plateau and changes in elevation are apparent in the landscape of this zone. *CHG*

Spatial Organization

- Preserve, manage and maintain the patterns of open and enclosed space in this zone adjacent to the historic core. The sense of openness in the historic core is defined by patterns of enclosing masses of trees at the western edge of this zone.
- Plant additional trees in informal groupings along the north/south topographical transition within this zone to reinforce the sense of spatial enclosure along the western edge and enhance the openness of the historic core.

Views and Vistas

- Create an observation point at the top of the knoll where there is a broad viewshed over Put-in-Bay.
- Minimize impacts to the viewshed of the neighbor to the east of the entrance driveway to the Memorial and Put-in-Bay.
- Preserve, manage and maintain the viewshed to the west from the staff residences toward the Memorial and Put-in-Bay.

Circulation

- Provide a sidewalk from the service driveway that runs parallel to Bayview Avenue and connects this zone to Zone 1.
- Provide the observation point mentioned above with shade, parking, and seating.

Provide limited parking on Bayview Avenue and/or a small, 5-8-space parking area off the service area driveway immediately south of Bayview Avenue.

- Add a contemplative node along south seawall.

Vegetation

- Plant additional trees along the western boundary in informal groupings to reinforce the sense of spatial enclosure and the openness of Zone 1.
- Provide additional trees near proposed black powder magazine to provide a loose screen.
- Continue to follow management guidelines under use in the park's turf management plan.
- Preserve trees within this zone with DBH equal to or greater than 3 inches. These trees should be saved as potential roosting habitat for the Indiana bat and the northern long-eared bat. If removal of trees of this size or greater cannot be avoided, removal should occur only between October 1 and March 31 (Figure 3-26).



Figure 3-26: Large trees in this zone would be preserved. *CHG*

Buildings and Structures

- Provide a new black powder storage facility with a 75-foot buffer from other buildings in this zone.

Treatment Plan

- Convert the existing black powder storage facility into a storage shed for maintenance equipment and tools.
- Provide an additional single-family staff residence north of the maintenance complex that matches the existing single-family residences.

Small-scale Features

- Provide site furnishings, such as benches and a trash receptacle in the proposed contemplative node. Chose furnishings based on the site furnishings guide.

Design Concept Alternatives

Introduction

Using the treatment plan as the basis for an approach to resource management, the visitor experience, and interpretation at Perry's Victory and International Peace Memorial, this section illustrates design concepts for implementing treatment recommendations and program elements as defined through the goals and objectives of the park. This section begins with the identification of site opportunities and constraints that lay out the challenges presented by the site in considering conceptual design. This is followed by a description of the concept alternatives presented here and evaluated further in the attached environmental assessment.

Opportunities and Constraints

Opportunities

Following the rehabilitation approach recommended in the treatment plan, there is an opportunity to develop compatible uses throughout the park, including Zone 1, the historic core, through repair, alterations, and additions, while preserving those portions or features that convey its historical, cultural, or design values. Other opportunities include:

- Experience by visitors of a clear transition from the surrounding community to the park, including a distinct park entrance at Hartford

Avenue, and from the intersection of Delaware and Toledo avenues;

- Entrance for visitors through the Peace Garden, which would extend from Hartford Avenue to Toledo Avenue;
- Expanded cultural and natural resource interpretation, educational programs, and special events;
- Full ABAAS access for pedestrian circulation and parking throughout the park and access to all buildings and structures open to the public, including the Memorial plazas; and
- Visitor amenities within expanded circulation that integrate the cultural landscape into the visitor experience.

Constraints

- A high-water table exists throughout much of the landscape and would limit the extent and type of features or land use to be developed within the park;
- Due to the location of the park on South Bass Island, storms and subsequent flooding occasionally threaten the condition and integrity of contributing features;
- The existing visitor center lacks a strong identity and visual connection from the village as visitors approach the park on Delaware and Bayview avenues;
- Challenges to ABAAS compliance exist in the park, including lack of wheelchair access to the Memorial plazas or to the elevator that provides access to the view on the observation platform. In addition, the park needs updates to other facilities, particularly the visitor center and its exhibits, to realize the goal of universal accessibility; and
- There is limited parking for vehicles and golf carts within the park boundaries.

Concept Alternatives

Refer to Figure 3-27: Concept A and 3-28: Concept B

Based on recommendations presented above, two design concepts were developed. The concepts provide contrasting methods of implementation of similar treatment recommendations. Within a framework of rehabilitation, the concept alternatives possess several commonalities in approach. Significant characteristics of the historic landscape would be preserved while adapting the site to meet contemporary needs and park management objectives. Significant commonalities include:

Enhancement of the visitor experience by creating a sense of entrance and welcome to the park through the development of the Peace Garden, and additional opportunities for engagement with the park through interaction with, and interpretation of, both cultural and natural resources;

- Provisions of wheelchair access to the Memorial plazas, the visitor center, and the park-wide pedestrian circulation system;
- Facilitation of enhanced visitor experience of the park through the expansion of circulation options, a plaza and pavilions for expanded programming and events, visitor nodes for seating and enjoyment of viewsheds, and expanded interpretation of visitor center exhibits and strategically located wayside exhibits;
- Addition of new administrative building and staff housing;
- Addition of expanded parking along Bayview Avenue;
- Addition of a new black powder storage facility and access path; and
- Installation of new tree plantings along the east and west edges of the historic core boundary to augment existing trees, creating a

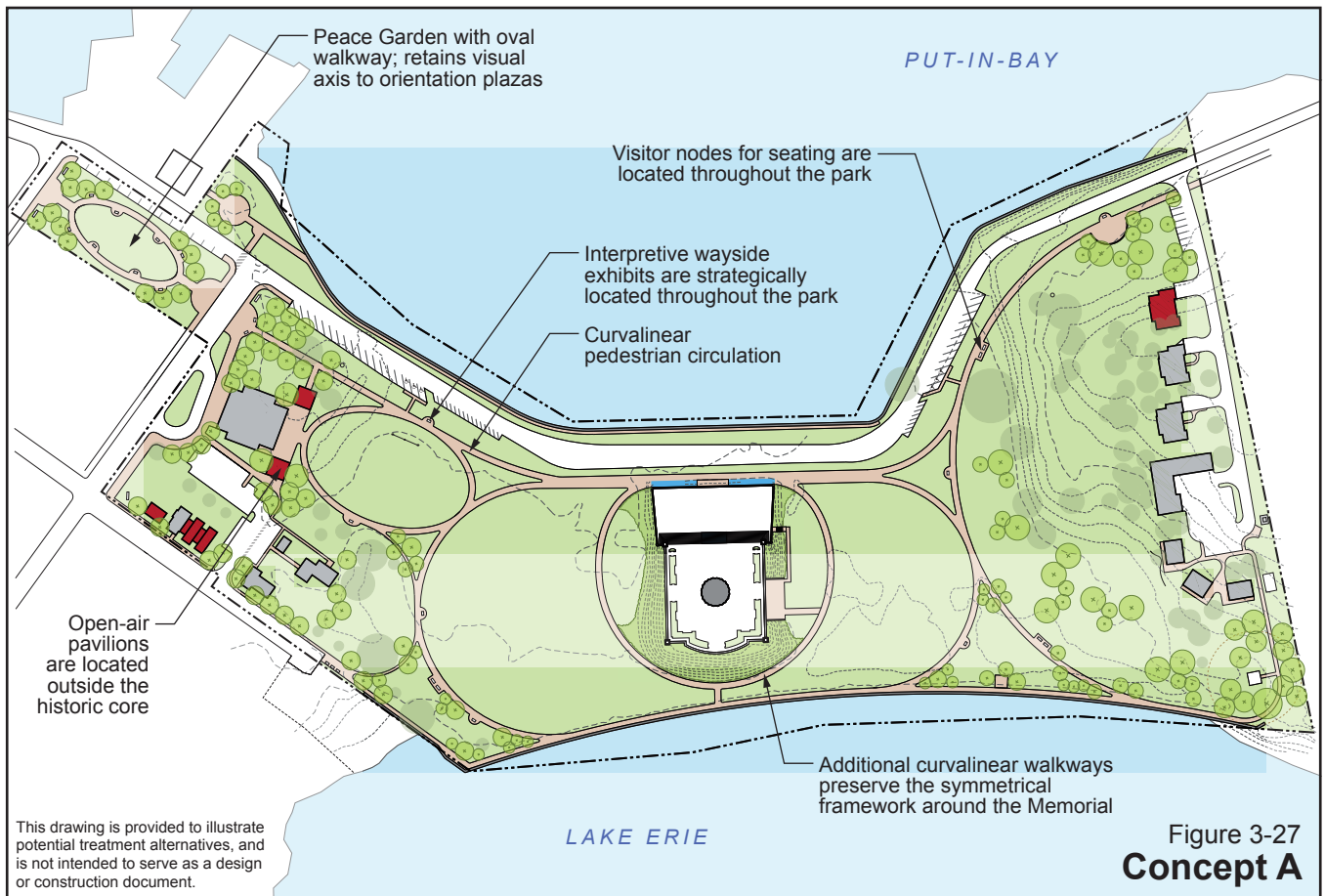
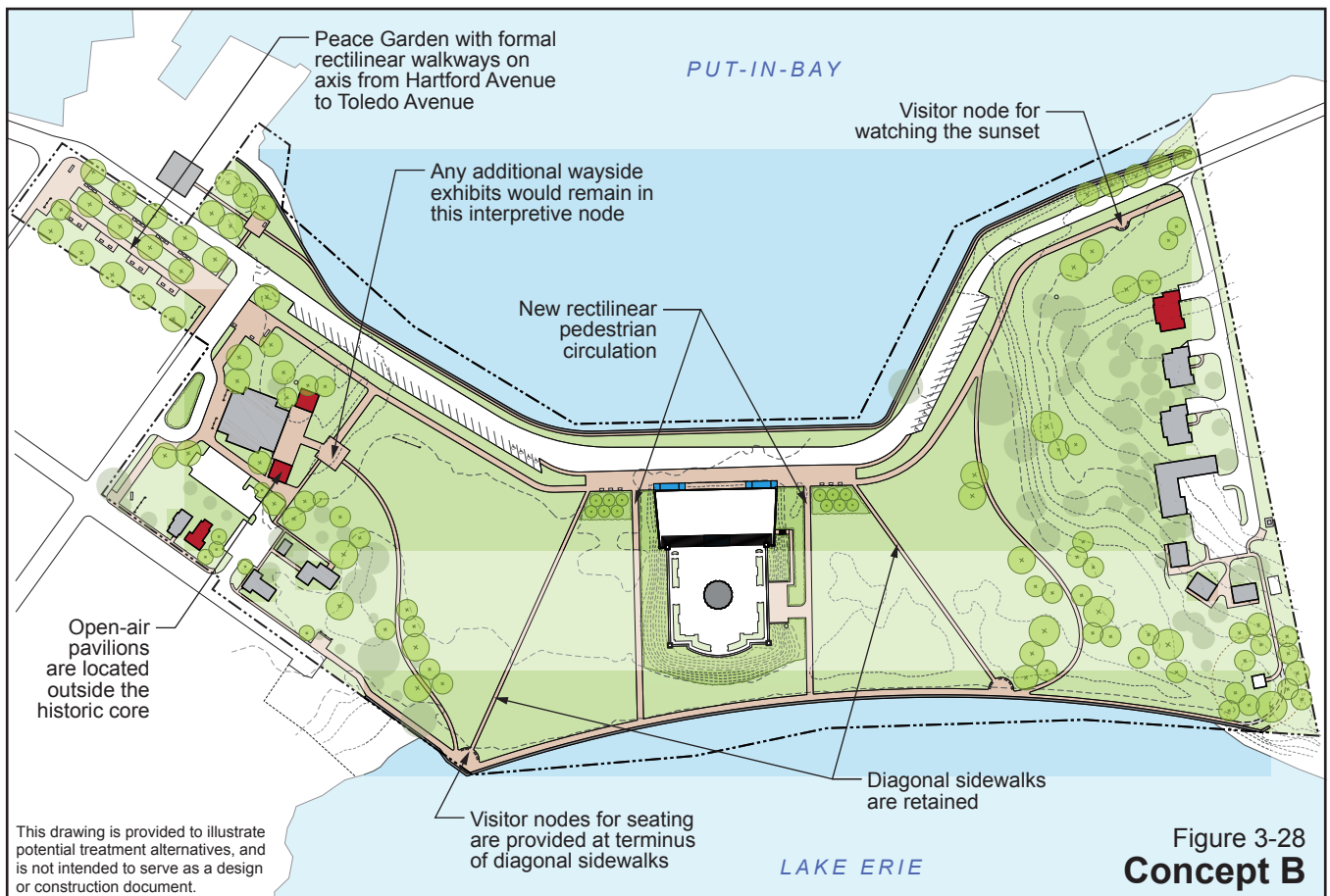
more defined enclosure of the historic core landscape.

Concept A

This concept focuses on preserving the spatial qualities of the historic Beaux-Arts style designed landscape, that is, the flat, open landscape punctuated with the vertical column of the Memorial, while introducing a new, curvilinear, pedestrian circulation system that maintains a strong, symmetrical pattern. Curvilinear paths have been used this way in many Beaux-Arts style landscapes to provide a transition between a formal centerpiece like the Memorial to the more informal landscape. The proposed path system would not retain any of the existing sidewalks except along the south seawall. This design has the advantage of delineating distinct landscape spaces for outdoor programs and passive recreational activities.

Concept B

This concept retains most features of the designed historic landscape of the historic core, with its strong expression of the Beaux-Arts style in the formal and symmetrical relationship of architecture to the landscape and its historic spatial character. It proposes the addition of two new walkways that parallel the Memorial terrace walls, which were part of the original Freedlander concept for the Memorial grounds. Curvilinear paths are proposed on the east and west boundaries of the historic core provide visitors with a more informal connection from the historic core to other park features and areas.



Chapter 4: Environmental Assessment

Introduction/Purpose and Need

Perry's Victory and International Peace Memorial is a fitting tribute to both a pivotal U.S. naval victory in the War of 1812 and a lasting peace between former enemies. The Memorial consists of a 352-foot high column on South Bass Island in Lake Erie, surrounded by 25 acres of landscape grounds. Visible for miles, it stands as a reminder not only of the events of the War of 1812, but also as a symbol of international peace between Great Britain, Canada, and the United States.

The National Park Service (NPS) is considering a series of actions in association with the treatment recommendations developed in the Cultural Landscape Treatment Plan (CLTP) for Perry's Victory and International Peace Memorial. The Cultural Landscape Treatment Plan was prepared to provide park staff with a long-term vision for protecting, managing, sustaining, and interpreting the designed historic landscape and guidance on integrating the cultural landscape with the visitor experience.

The Environmental Assessment (EA) analyzes the potential impacts and effects resulting from the implementation of the No Action Alternative and two action alternatives for expanding the facilities at Perry's Victory and International Peace Memorial. The NPS has prepared the EA in compliance with: National Environmental Policy Act of 1969, as amended (NEPA); the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508]; the National Historic Preservation Act of 1966, as amended (NHPA); NPS Director's Order-12 (as reflected in

the DO-12 Handbook); and Section 106 of the National Historic Preservation Act of 1966 as amended. The NEPA process is being used to comply with Section 106 of the NHPA and the Advisory Council on Historic Preservation's implementing regulations at 36 CFR 800.8 (c).

Perry's Victory and International Peace Memorial is a unit of the NPS and therefore, in accordance with the (NEPA) of 1969, the NPS acting as lead federal agency has prepared this EA to identify alternatives and assess the potential impacts of the proposed action. Concurrently, the NPS has been conducting consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA) and Section 7 of the Endangered Species Act of 1973.

Purpose and Need

The purpose of the proposed project is to: preserve the Memorial and its designed cultural landscape while guiding rehabilitation for enhancing the visitor experience and enjoyment of the landscape through: 1) integration of interpretation with the cultural landscape; 2) development of ABAAS compliant accessibility to indoor/outdoor experiences that coincide with the enhanced stewardship of the park's significant cultural and natural resources; and 3) preservation of a backdrop within a peaceful setting to promote a stronger understanding of and meaningful relationship to the Battle of Lake Erie in 1813 and resultant lessons of international peace.

The project is needed to provide a richer and more complete visitor experience of the park through access to the cultural landscape and associated interpretation and provide additional opportunities for expanded programming

integrated within the landscape. Also, the park has accrued features from both planned and extemporaneous decisions in recent years and guidance on intentional preservation, removal or rehabilitation of the designed landscape as a whole is needed.

Objectives

All alternatives identified for detailed analysis must meet objectives to a large degree and resolve the purpose of and need for the action. The following objectives were identified by the planning team:

- Preserve the monument and its designed landscape as fundamental resources and values of the park.
- Preserve the horizontality of the landscape setting, supported by open lawn, upper and lower plazas, and expanses of water surrounding the park - all working together to accentuate the vertical column;
- Integrate architecture and the landscape with plazas; seawalls, sidewalks, and circulation reflecting traditional Beaux Arts style.
- Preserve viewsheds to and from the Memorial; views from a distance while approaching South Bass Island by boat; view of the grounds and Memorial from the eastern end of Gibraltar Island; views of the column from historic grounds; and views from the column to the site of the 1813 Battle of Lake Erie.
- Design specific opportunities for engagement through interaction with—and interpretation—of both cultural and natural landscape features. Implementation of ABAAS standards at the Memorial plazas, the visitor center, and the pedestrian circulation system would be paramount for expanded visitor opportunities.
- Establish compatible spatial transitions between the surrounding community and the Memorial. Provide for guidance in managing viewsheds and spatial definitions, and the

character of gradual or defined transitions between the park and adjacent neighborhoods;

- Provide better integration of sidewalks connecting the designed landscape to the surrounding community;
- Examine methods to achieve sustainability goals for lighting and landscape maintenance.
- Coordinate the plaza and column rehabilitation projects with vegetation replacement in the vicinity of the existing Austrian pines. These trees will be lost during the rehabilitation project.
- Apply a consistent and intentional approach to design and maintenance, given that the site presents inconsistent application of materials such as concrete, brass and vegetation.

Relationship to Park Planning Efforts

This plan fulfills a park priority for resource management and visitor experience at Perry's Victory and International Peace Memorial and serves as a component of the park's planning portfolio. This follows the NPS's "Planning Portfolio" construct, consisting of a compilation of individual plans, studies, and inventories, which together guide park decision making. The planning portfolio enables the use of targeted planning products (such as this one) to meet a broad range of park planning needs, a change from the previous NPS focus on stand-alone general management plans. The planning team relied on the park's previous planning and masterplan concept designs for guidance in developing the alternatives. Documents include: *Cultural Landscape Report for Perry's Victory and International Peace Memorial* (1994); *Cultural Landscape Inventory* (2011); *Long Range Interpretive Plan* (2012); *Foundation Document* (2012); *National Register of Historic Places Nomination (Updated)* (2014); *Development Concept Revision* (1992); *Design Development – Approach Mall* (1994); and *Visitor Center Construction Drawings* (2000). Combined, these

documents provide Perry's Victory and International Peace Memorial with a vision and clear direction for sustained long-term management, interpretation, and preservation of the overall character and historic features of the designed landscape with priorities on natural and cultural resource conditions and visitor use and experience. Recommendations in the Cultural Landscape Treatment Plan were developed in conjunction with the development of the alternatives to be evaluated in the EA. The treatment recommendations informed the development of the alternatives and aided in decisions on actions that were common to the alternatives.

Park Background

Perry's Victory and International Peace Memorial consists of a 352-foot high column on South Bass Island in Lake Erie surrounded by 25 acres of landscaped grounds. It is approximately eight miles northeast of Port Clinton, Ohio (Figure 4-1). Visible for miles, it stands as a reminder not only of the events of the War of 1812, but also as a symbol of international peace between Great Britain, Canada, and the United States. The Memorial was built by a nine-state commission with matching federal funds between 1912 and 1915. Twenty-one years after it was built, Congress charged the NPS to preserve and manage the Memorial.

The Memorial site straddles a narrow isthmus about 250 yards wide between the village of Put-in-Bay to the west and the former agricultural area to the east. Although devoted to farming and viticulture in the past, much of the island has been converted to summer housing and resorts. The Memorial grounds divide the residential and commercial areas of the village from the less populated and largely residential east end of South Bass Island.

When assembled from the various properties of individual landholders in 1911–1912, the Perry's Victory and International Peace Memorial site encompassed 14.25 acres. After the NPS acquired the property and designated it a National Monument, the boundaries of the site changed.

The National Park Service added acreage to the east and west of the Memorial beginning in 1959. They also moved the location of part of the south seawall farther south in 1977–1978 and removed most of the road that formed the original western boundary in 2001–2002. Historically, the boundaries included: Chapman Avenue on the west side (no longer existing); seawalls to the north and south, and a slight ridge to the east, formed by the topography and defined by large tree plantings. Most development of the island in recent years consists of summer homes west of the village, and minimal construction east of the park. NPS erected a maintenance building and summer residences for staff along the eastern edge of the park and beyond the original site boundaries. These buildings are slightly screened from the Memorial by tree plantings that mark the original property line.

Park Significance

Park significance statements express why park resources and values are important enough to warrant national park designation. Statements of the park's significance describe why an area is important within a global, national, regional, and systemwide context. These statements are directly linked to the purpose of the park and are substantiated by data or consensus. They reflect the most current scientific or scholarly inquiry and cultural perceptions which may have changed since the park's establishment.

Perry's Victory and International Peace Memorial is significant because:

- The battle, fought between American and British naval forces, was a decisive American victory in the War of 1812 for forces under the command of Oliver Hazard Perry, who launched the battle from the strategic safe harbor at South Bass Island.
- The victory precipitated events with both personal consequences for individuals involved in the battle and far-reaching results for nations involved in the War of 1812-settlement patterns. American Indian tribes including the Wyandots, Delaware, Ottawa

and Miami were forced westward across the Mississippi River making way for territorial expansion. Tecumseh, the Native American Shawnee warrior and his confederacy of tribes sided with the British in the War of 1812. After

the United States took control, as peace was achieved through the Treaty of Ghent, the British and their Indian allies retreated to upper Canada.



Figure 4-1: Project Boundary for Perry's Victory and International Peace Memorial within the context of Lake Erie and northern Ohio. U.S.G.S. Survey Map

- The Memorial serves as a symbol of international peace and a constant reminder of the ongoing cooperation between former enemies. It was an engineering marvel of its time and an architectural statement to memorialize the battle as well as the centennial of lasting peace between Great Britain, Canada, and the United States of America. Commissioned by nine states including Ohio, Michigan, Pennsylvania, Illinois, Wisconsin, New York, Kentucky, Massachusetts, and Rhode Island, and located on South Bass Island, the Memorial is symbolic for being within sight of the undefended border. (Figures 4-2 and 4-3).
- The Memorial is also significant because it serves as a tomb for 3 American officers and 3 British officers killed in the Battle of Lake Erie on September 10, 1813. Their remains lie in the domed room at the center of the base of the column. They were originally located where the Village of Put-In-Bay is now located but were removed and interred in the crypt at the Memorial on September 11, 1913.
- The Memorial exhibits the lasting results of peace symbolized by disarmament and arbitration.
- The memorial offers the ability to interpret war from multiple perspectives ¹

The park's significance, and management objectives are not linked to the impairment findings. Management actions and projects are subject to review through the NEPA process to assess potential impacts to natural and cultural resources.

Public Process

An internal kick-off planning and scoping meeting was held at Perry's Victory and International Peace Memorial on October 4-7, 2016, and



Figure 4-2: Panoramic views are available from the observation deck of the Memorial column. This viewshed is critical to understanding the Battle of Lake Erie in 1813. CHG



Figure 4-3: Orientation maps are provided on the observation deck of the column to help *interpret* the views and the significance of the battle. CHG

included NPS Midwest Region staff, park staff, and the project team members from Commonwealth Heritage Group, Inc. (CHG) and Wiss, Janney, Elstner, Inc. (WJE). The meeting focused on development of the *Comparative Analysis* (CA) and the *Cultural Landscape Treatment Plan* (CLTP) and associated *Environmental Assessment* (EA). Stakeholder groups were identified in the meeting and all identified received invitations to scheduled open house meetings and the final public meeting for review of the design concept alternatives and the draft CLTP/EA.

¹ *Perry's Victory and International Peace Memorial Foundation Document*, National Park Service, Department of the Interior, October 2012, 3-5.

A public open house was held on October 6, 2016 to introduce the CLTP/EA project to residents of South Bass Island, park staff, and interested stakeholders. The project was presented by the Superintendent and the planning team was introduced. Goals and objectives of the project were presented and participants expressed various concerns about effects of the project on natural resources and on the condition of the village beach.

An internal planning workshop with park staff and the planning team was held on May 16-17, 2017. Goals were to review progress on the CLTP/EA, develop alternative design concept plans, and formulate further specific goals and objectives for the project. The second public open house was held on May 17, 2017 after the workshop, to present conceptual alternatives and gain feedback for use in subsequent planning and design.

The public had an additional avenue of participation through a public meeting on October 25, 2017. This meeting gave stakeholders and staff an opportunity to see developed concept design alternatives. Comments and suggestions were incorporated into the draft CLTP/EA based on public input. The next submission of the document was for public and agency review on the NPS Planning, Environment, and Public Comment (PECP) system website. After a 30-day review, all comments were analyzed, and any revisions deemed necessary were made and incorporated into the final document.

Impact Topics

Impact Topics Retained for Analysis

Impact topics are the resources of concern that may be affected by the range of alternatives reviewed in the EA. Impact topics were identified to ensure alternative comparisons were based on the most relevant issues. Impact topics are derived from issues raised during scoping and from NPS guidelines concerning topics that should be taken under consideration when conducting NEPA and Section 106 analysis.

The following impact topics were retained for further analysis: soils and geology; water

resources/floodplains; vegetation; wildlife; threatened and endangered species; historic buildings and structures; cultural landscapes; historic viewsheds; visitor use and experience; and human health and safety. A brief rationale for the selection of each impact topic is provided and each impact topic is discussed in detail in the Affected Environment section.

Soils and Geology. The NPS actively seeks to understand and preserve the soil resources of parks and to prevent to the extent possible, the erosion and physical removal or contamination of the soil or its contamination of other resources. There is potential for soil disturbances from the implementation of the alternatives. Therefore, this topic was retained for further analysis.

Water Resources and Floodplains. Due to the location of the park on South Bass Island, storms and subsequent flooding have periodic effects on the landscape and historic features. The watershed hydrology may be further affected by implementation of the alternatives. Therefore, this topic was retained for further analysis.

Vegetation. Vegetation disturbance would occur and the introduction of more invasive non-native species is possible from activities implemented in the alternatives. Therefore, this topic was retained for further analysis.

Wildlife. The landscape and vegetation of the park supports a variety of birds, small mammals, and reptiles. Disturbances from the implementation of the preferred alternative would potentially impact some species and their potential habitats. Therefore, this topic was retained for further analysis.

Threatened and Endangered Species. Species of concern (flora and fauna) are present at the park. Disturbances due to the implementation of the alternatives would potentially impact critical species on the site and within the site's regional context. Therefore, this topic was retained for further analysis.

Historic Buildings and Structures. The future of historic structures within the landscape of the

park is a key issue in the CLTP. The plan includes a variety of treatment recommendations and actions within the alternatives. Therefore, historic buildings and structures were retained as “cultural resources for analysis” in the EA.

Cultural Landscapes. The preservation and integration of the cultural landscape into the visitor use and experience of the park and the interpretation of the landscape are key concerns in the CLTP. Some actions may require ground disturbances or removal of vegetation with potential impacts to the cultural landscape of the park. Therefore, this topic was retained as “cultural resources for analysis” in the EA.

Historic Viewsheds. Management of established historic viewsheds, critical to the interpretation of the Battle of 1813 and critical to the visitor experience of the park may have potential impact on the site. Therefore, this topic was retained for further analysis.

Visitor Use and Experience. The alternatives would impact overall visitor understanding of the designed landscape and the stories and themes essential to understanding the significance of the park. Therefore, this topic was retained for further analysis.

Human Health and Safety. Due to recommended actions within the alternatives, visitor use would increase and with it, continual maintenance and management of facilities to ensure the safety and welfare of the public. Therefore, this topic was retained for further analysis.

Impact Topics Considered and Not Retained for Analysis

Environmental Justice. Presidential Executive Order 12898, General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income

populations and communities. According to the Environmental Protection Agency, environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. The goal of fair treatment is not to shift risks among populations, but to identify potentially disproportionately high and adverse effects and identify alternatives that may mitigate these impacts.

The village of Put-in-Bay contains both minority and low-income populations; however, environmental justice is dismissed as an impact topic for the following reasons:

- Implementation of all alternatives would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse effects on any minority or low-income populations.
- The impacts associated with implementation of all alternatives would not disproportionately affect any minority or low-income population or community.
- Implementation of all alternatives would not result in any identified effects that would be specific to any minority or low-income community.
- The impacts to the socioeconomic environment resulting from implementation of any of the action alternatives would be beneficial. In addition, NPS and the planning team do not anticipate the impacts on the socioeconomic environment to alter the physical and social structure of the nearby communities.

Ethnographic Resources. Because no ethnographic resources or traditional cultural properties exist in the areas under consideration in this document, this topic was dismissed from further analysis.

Indian Trust Resources. Indian trust resources include tribal lands, assets, resources, and treaty rights. Any anticipated impacts to Indian trust resources that would result from a federal action must be explicitly addressed in environmental documents. There are no Indian trust resources within the boundaries of Perry's Victory and International Peace Memorial. Therefore, this topic was dismissed from further consideration.

Archeological Resources. According to the National Register Nomination update (2014) for Perry's Victory and International Peace Memorial, there are no significant archeological sites associated with the historic grounds or within areas outside the historic grounds that may be disturbed by actions proposed within the project.

Museum Collections. The actions described in the alternatives would have no impact on museum collections. Therefore, this topic has been dismissed from further analysis.

Air Quality. The actions described in the alternatives would have no impact on air quality. Therefore, this topic has been dismissed from further analysis.

Water Quality. The actions described in the alternatives would have no impact on water quality. Therefore, this topic has been dismissed from further analysis.

Carbon Footprint. For the purposes of this planning effort, "carbon footprint" is defined as the sum of all emissions of carbon dioxide and other greenhouse gases, including methane and ozone, that would result from implementation of the action alternative. Understanding the carbon footprint of the alternatives is important for determining contribution to climate change. This impact topic was dismissed from further analysis for several reasons: 1) no changes would occur in the way visitors reach the project area by boat or airplane as a result of the alternatives; 2) the minimal new development proposed in the project area would not noticeably increase greenhouse gas emissions; and 3) newer sustainable building

practices should help limit additional greenhouse gas emissions.

Natural Soundscape. An important part of the NPS mission is preservation of natural soundscapes associated with national park units as indicated in NPS Management Policies, 2006, and Director's Order 47: Sound Preservation and Noise Management. The action alternatives do not introduce additional noise and traffic from visitors and park staff. Therefore, natural soundscapes was dismissed as an impact topic.

Lightscape. In accordance with NPS Management Policies, 2006, the NPS strives to preserve natural ambient lightscapes, which are natural resources and values that exist in the absence of human-caused light. Lighting of the Memorial column has been part of its history. The action alternatives would not increase any use of night lighting, specifically at the visitor center and entrances to the park. Therefore, lightscape was dismissed as an impact topic.

Natural or Depletable Energy Resource Requirements and Conservation Potential. In accordance with NPS Management policies, 2006, and Executive Orders 12873 and 12902, there are requirements in everything the NPS does that will have some small affect in improving our environmental footprint (green buying and sustainable building materials, etc.). However, individual changes at Perry's Victory and International Peace Memorial are unlikely to have adverse impacts to the wider universe of energy use and depletable resources. Therefore, this impact topic was dismissed from further analysis.

Development of Alternatives

The NEPA process consists of evaluating the environmental effects of a federal undertaking, which is presented as a series of at least two alternative actions. This section describes proposed alternatives that respond to the purpose and need of the project. Three alternatives were evaluated: Alternative 1: No Action; Alternative 2: Curvilinear Pedestrian Circulation and Integration of the Historic Designed Landscape; and

Alternative 3: Rectilinear Pedestrian Circulation Maintained with Existing and Proposed Connecting Walkways and Visitor Nodes.

Alternative 1 (No Action): The No Action Alternative preserves and maintains existing conditions at the park. Within this alternative current management strategies would remain the same and there would be no addition of facilities or expanded interpretation in association with the cultural landscape.

Alternatives 2 and 3 (Action Alternatives): The proposed design concept alternatives are intended to address issues, challenges/opportunities, goals and objectives outlined in previous park planning documents and identified by park staff through workshops and discussions, NPS communications, and from the project scope. Meetings and workshops with park staff were instrumental in the decision-making process and included specific goals and objectives for a comprehensive vision for the design and management of the park for the next 20 years. The action alternatives have common goals and objectives but contrasting implementation strategies. Public input received during scoping was important in the development of the alternatives. This process helped the planning team understand the public's values and preferences regarding visitor experiences in the park and their concerns, issues, and suggestions related to accessibility, quality of the visitor experience, vegetation management, protection of cultural and natural resources, and the condition of the adjacent village beach.

The No Action Alternative

Preserve Existing Conditions and Continue Current Management Strategies

Refer to Figure 4-4: Alternative 1

Alternative 1 would reflect continuation of current practices with minimal improvements for visitor accommodation and accessibility. The following are challenges related to existing conditions in the park based on discussions and comments from park staff.

- There is no clear sense of entry and orientation as visitors arrive at the park.
- Visitor center precinct and the pedestrian circulation system has limited compliance with Architectural Barriers Act Accessibility Standards (ABAAS).
- Restrooms are partially accessible and the pedestrian route that leads to the restrooms from parking north of the Memorial is not in compliance with ABAAS standards. Compliant accessibility does not include using parking areas or roads to substitute for accessible circulation.
- The Memorial plazas and column are not compliant with ABAAS standards. Programmatic accessibility is not provided near the Memorial and is limited at the visitor center (Figures 4-5 and 4-6).



Figure 4-5: Small staircases are the only pedestrian access to the lower plaza. The grand ceremonial steps are the only access to the upper plaza. ABAAS accessibility standards are not in place. CHG



Figure 4-6: View from the north seawall clearly shows the barriers to accessibility to the Memorial and plazas. *CHG*

- A Black powder magazine is located in close proximity to occupied buildings and a propane tank. This location is not compliant with regulations governing the storage of black powder.
- The park's landscape maintenance program is limited to a seasonal gardener position.
- Spatial patterns defining the historic landscape are diminished. Openness in the center of the grounds was historically framed by vegetative masses east and west of the historic core (Figures 4-7 and 4-8).
- There is no clarification of goals for the visitor experience including recreational use of the formal expanse of lawn in the historic core.
- Replacement paving for the gravel surfacing of the upper plaza remains an issue. Color, textures, patterns, life-cycle costs and material sustainability should be the basis for decision-making as well as original design intent and historic precedent.
- Above ground utilities and powerlines remain on the site within historic viewsheds.
- There is no connection to East Point from the park. The current sidewalk north of the Memorial ends at the transition from the historic core management zone to the park housing/maintenance management zone.



Figure 4-7: Definition of enclosed space is diminished east of the Memorial at the edge of the historic core and the park housing/administration management zone. *CHG*



Figure 4-8: Definition of enclosed space is diminished west of the Memorial at the edge of the historic core and the visitor access management zone. *CHG*

- There is no clear direction or access from the park to the village beach access across Delaware Avenue (Figures 4-9 and 4-10).



Figure 4-9: The village beach provides the only picnic table amenities around the park. *CHG*

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Legend

- Memorial Park Boundary
- Vehicular circulation
- Concrete sidewalk
- 2' Contours
- Existing buildings
- Existing structures
- Existing trees

Management Zones

- Historic Core
- Visitor Access/Park Administration
- Park Housing/Maintenance

- Utility boxes
- Black powder magazine
- Dumpster
- Camper pad

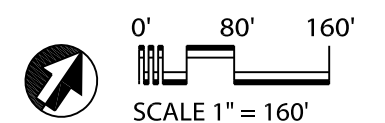


Figure 4-4
Alternative 1
No Action Alternative

This drawing was prepared to illustrate the Environmental Assessment for Perry's Victory and International Peace Memorial in 2018. This drawing is provided to illustrate potential treatment alternatives, and is not intended to serve as a design or construction document.

Data Sources: Base map based on GIS shapefiles provided to the authors by NPS and supplemented through with aerial photography and other NPS maps



Figure 4-10: From within the park there is no clear direction or node along the pedestrian circulation system to define clear access from the park to the beach boardwalk. CHG

Actions Common to Alternatives 2 and 3 (Action Alternatives)

Within a framework of rehabilitation, the actions within the design concept alternatives possess several commonalities in approach. Significant characteristics of the historic landscape would be preserved while adapting the site to meet contemporary needs and park management objectives. Significant characteristics include:

- **Horizontality of the landscape setting which accentuates the vertical column:** The integration of architecture and the formal landscape is characteristic of the Beaux Arts style.
- **Definition of the boundary edges of the historic core with tree massing:** Historic core boundary edges are shown in Figure 4-4. The historic core is defined by horizontal expanses of grass lawn, two horizontal plazas, and horizontal expanses of water surfaces north and south of the Memorial. Current tree massing provides a vertical contrast to the topography and a sense of spatial enclosure at the edges of the historic core. The number of existing trees providing spatial definition has diminished over time.
- **Integration of architecture and landscape typical of Beaux Arts style plazas, sidewalks, and circulation.**
- **Preservation of viewsheds to and from the Memorial:** These include: views from the distance when approaching South Bass Island by boat; views of the grounds and Memorial from the eastern end of Gibraltar Island; views of the column from within the park; and views from the column to the site of the 1813 Battle of Lake Erie.

Goals and objectives established in the Cultural Landscape Treatment Plan common to each action alternative include:

- Integration of expanded interpretation with an approach to managing the cultural landscape;
- Utilization of the *Long-Range Interpretive Plan* (2012) visitor experience objectives to form a justification for the proposed introduction of elements into the historic landscape;
- Preservation of the designed landscape as the principal asset of the Memorial, including the individual features and the overall historic character;
- Enhancement of the visitor experience by creating a sense of entrance and welcome to the park and opportunities for engagement with the park through interaction with and interpretation of both cultural and natural resources;
- Provision of full compliance with ABAAS standards for accessibility to the Memorial plazas, the visitor center, the parkwide pedestrian circulation system, and other park administration buildings and housing;
- Facilitation of enhanced visitor experience of the park through additional circulation options, pavilions for expanded programming and events, visitor nodes for seating and enjoyment of viewsheds, and expanded interpretation of visitor center exhibits and strategically located wayside exhibits;
- Installation of new tree plantings along the north/south perimeter edge of the historic core boundary to augment existing tree

plantings, creating a more defined enclosure of the horizontal landscape of the historic core;

- Installation of a pedestrian sidewalk adjacent to the north seawall;
- Design of transitions from the village to the park from both Hartford Avenue and Toledo Avenue. Transition areas would be designed to create a sense of entrance and welcome to the park and provide orientation, information, and choices for the visitor experience;
- Integration and connection of the park to the village beach boardwalk access and visitor amenities;
- Provision of additional park staff housing and park administration facility; and
- Provision of a black powder magazine and buffer zone that meets compliance standards.

Alternative 2 Action Alternative

Curvilinear Pedestrian Circulation; Integration of Landscape Focus

Refer to Figure 4-11: Alternative 2

Alternative 2 would preserve the designed historic landscape indicative of the Beaux Arts tradition of formal integration of architecture and landscape through design of a curvilinear pedestrian circulation system. The curvilinear framework would retain the contrast of the horizontal landscape with the vertical column of the Memorial and introduce a strong symmetrical pattern around the Memorial. The circulation system would not retain any existing sidewalks except along the south seawall. The design concept would create distinct landscape spaces for the purpose of preserving the horizontal expanses of lawn flanking the Memorial and providing opportunities for outdoor programs. Integration of the landscape into the visitor experience would include expanded interpretation of cultural resources in the park. High priorities would be: visual and physical access to the Memorial; formal and welcoming entrances and transitions from the

village to the park; and clear connections to important site features.

Specific actions resulting from the implementation of this alternative would include:

Peace Garden and Entrances to the Park

- Design of the Peace Garden between Hartford and Toledo Avenues would provide visitor entrance to the park with a clear sense of arrival, direction, and welcome. The Peace Garden would provide interpretive wayside exhibits, seating nodes and large shade trees along an oval walkway. The oval would begin at the entrance to Hartford Avenue and terminate with an orientation plaza where visitors would be provided with direction, information, and choices associated with their experience of the park.
- A plaza area would form the terminus of the oval walkway and provide site orientation with a direct view to the Memorial; direction to and through the visitor center; and site furnishings for visitor comfort and orientation.
- A second entrance to the park would be provided at the intersection of Delaware Avenue and Toledo Avenue at the southwest boundary. This access area would provide visitors with orientation; viewsheds to the Memorial; and directions to the visitor center.

Pedestrian Circulation

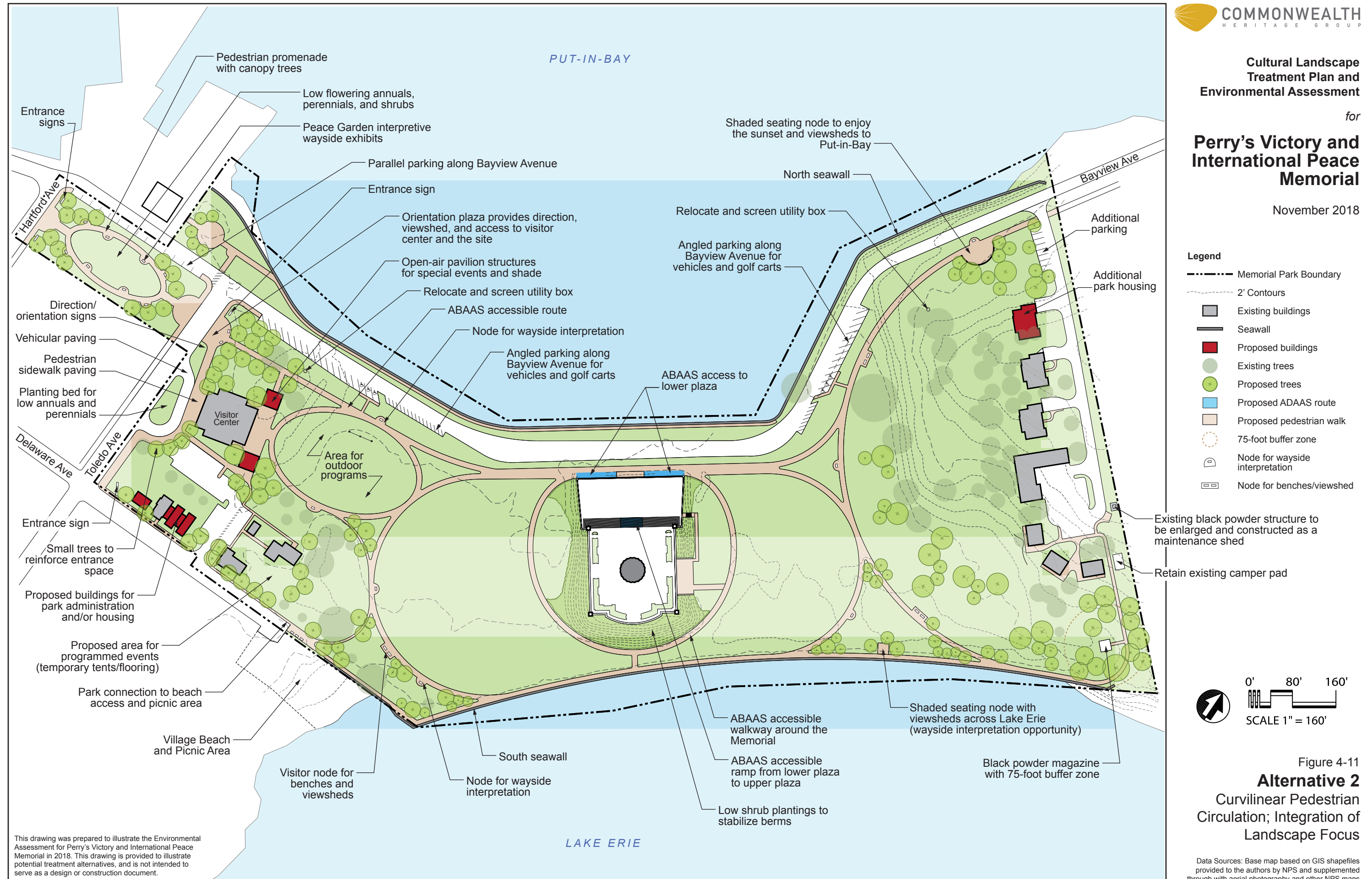
- The circulation system would provide compliant accessibility for all visitors to the Memorial through a curvilinear pattern of walkways affording the opportunity to integrate the landscape into the visitor experience and expand interpretation of the cultural landscape with wayside exhibits strategically placed in nodes along the sidewalks. Viewsheds would be provided and enhanced with wayside interpretation specific to the themes described in the Long Range Interpretive Plan. The circulation pattern would create smaller landscape spaces conducive to passive recreational activities. Nodes would be located strategically on the

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sidewalks, providing opportunity for wayside exhibits, benches, and views of the Memorial and surrounding landscape.

- The pedestrian walkway north of the Memorial would extend to the northeast end of the park, providing access to a contemplative node with an open viewshed across the water. The walkway would terminate at the service drive. A small parking area would be provided at the entrance to the service drive. Parking and walkways would meet ABAAS accessibility standards.

Parking

- Existing parking associated with the visitor center and park administration building would be retained, with a single entrance/exit from Delaware Avenue.
- The tram loop drive would remain and the interior island of the loop would be planted with an array of colorful annuals, perennials, and grasses.
- Angled parking for vehicles and golf carts would remain on Bayview Avenue north of the Memorial, with sidewalk connections to the major walkway.

Vegetation

- Most of the existing trees in the park would be retained. The Austrian pines would remain around the base of the Memorial until the plaza rehabilitation begins. Construction would require that the Austrian pines be removed. They would not be replaced within this alternative. The grass berms would be stabilized with low-growing shrubs or groundcover.
- The tall birches currently in the loop drive island would be removed in order to allow better visual connection from the park entrances to the visitor center. New vegetation in the island would include colorful annuals, perennials, and grasses.

- Proposed trees would enhance the entrance sequence through the Peace Garden. Trees in this area would provide shade, and enclosure would accentuate the axial relationship of the pedestrian nodes within the Peace Garden. Character and size of the trees would follow recommendations in the CLTP.
- Proposed trees would function to direct views to the visitor center retaining the viewshed from the orientation plaza to the Memorial column. The trees would be deciduous and smaller than the shade trees in the Peace Garden. Character and size of the trees would follow recommendations in the CLTP.

Buildings and Structures

- Open-air pavilions would be provided east of the visitor center, affording opportunities for group events and programs, shade, and protection from the rain.
- Upper plaza paving would be granite and brick, based on the original Freedlander plans as described in the CLTP.
- Upper plaza panels would be retained and maintained with grass as recommended in the CLTP.

Alternative 3 Action Alternative (NPS Preferred Alternative)

South Nodes with Lakeside Promenade; Memorial Focus

Refer to Figure 4-12: Alternative 3

The concept for this alternative would retain the designed historic landscape originating in the traditional Beaux Arts style of formal and symmetrical relationships of architecture and the landscape. The relationship of architecture and the landscape would be preserved within a pattern of rectilinear sidewalks near the Memorial reinforcing the contrast of the horizontal landscape with the vertical column. In order to preserve this relationship, a circulation framework would include existing and proposed sidewalk connections throughout the park. Symmetry

around the Memorial would be preserved and enhanced by new sidewalks and the horizontal expanse of the open lawn landscape. Additional new sidewalks would border the edge of the historic core and provide visitors with a more informal connection from the historic core to park features and areas east and west of the Memorial. Goals in this alternative include: visitor amenities and opportunities for expanded interpretation; clear and welcoming transitions from the surrounding community to the park; and a variety of connections to features throughout the park.

Specific actions resulting from the implementation of this alternative include:

Peace Garden and Entrances to the Park

- Design of the Peace Garden between Hartford and Toledo Avenues would provide a formal visitor entrance to the park with a clear sense of arrival, direction, and welcome. The Peace Garden would provide interpretive wayside exhibits, seating nodes and large shade trees. A formal axial promenade would begin from Hartford Avenue and terminate with an orientation plaza with direction, information, and choices associated with their experience of the park.
- The orientation plaza would provide a direct view to the Memorial and associated wayside interpretation; direction to and through the visitor center; and site furnishings for visitor comfort and orientation.
- A second entrance to the park would be located at the intersection of Delaware Avenue and Toledo Avenue at the southwest corner of the Park. This park access would provide visitors with orientation, viewsheds to the Memorial, welcoming banners, and information.

Pedestrian Circulation

- The circulation system would provide access to the Memorial through existing sidewalks north and south of the memorial and the existing diagonal walkways. Two additional sidewalks aligned parallel with the Memorial

would be added for ease of access to the Memorial and direct connections to the north and south sidewalks. Two additional curvilinear walkways would be integrated into the plan to provide an informal and shady connection through the trees from the visitor nodes at the south sea wall.

- A node for interpretive wayside exhibits would be provided east of the visitor center and the open air pavilions. Wayside exhibits would be limited to this area and would not be spread over the entire circulation system of the park.
- Three additional visitor nodes would be provided. One node would terminate each diagonal walkway at the south seawall sidewalk and a node would be provided in the northwest corner of the park associated with the sidewalk. Benches would afford visitors expansive viewsheds of the Memorial and the Lake and Bay surrounding the park. All parking and pedestrian circulation would meet ABAAS standards for accessibility.

Parking

- Existing parking associated with the visitor center and park administration building would be retained, with a single entrance/exit from Delaware Avenue.
- The tram loop drive would remain and the interior island of the loop would be planted with an array of colorful annuals, perennials, and grasses.
- Existing trees would remain in the park unless construction required removal. The Austrian pines around the Memorial would remain until the rehabilitation of the plaza began, requiring their removal. After rehabilitation of the plaza, new trees would be planted flanking each side of the Memorial. The grass berms would be stabilized with low-growing shrubs or groundcover.

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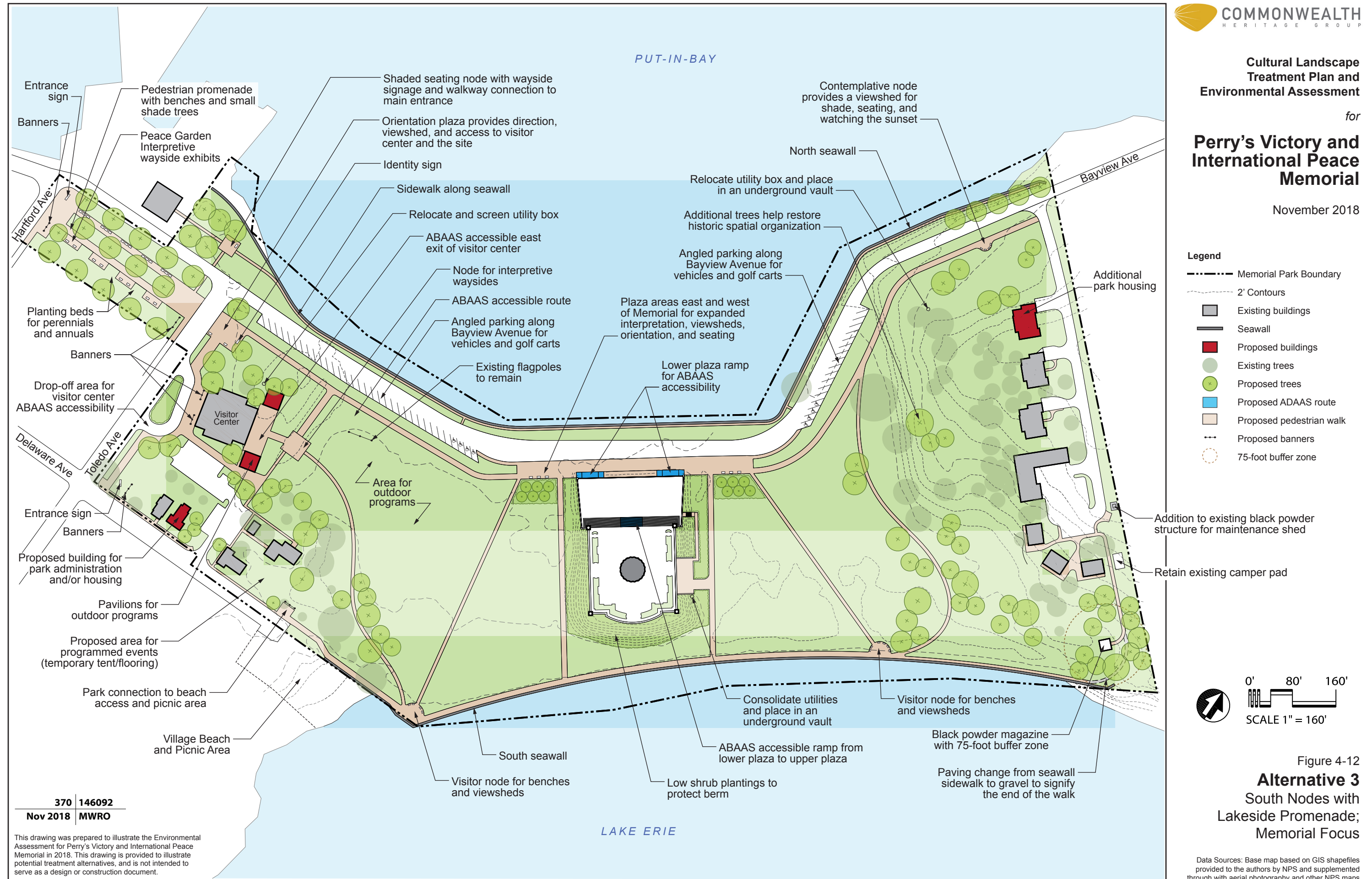
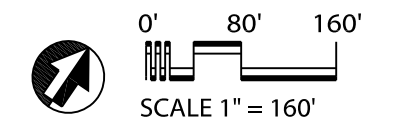


Figure 4-12
Alternative 3
South Nodes with
Lakeside Promenade;
Memorial Focus

Data Sources: Base map based on GIS shapefiles provided to the authors by NPS and supplemented through with aerial photography and other NPS maps

- Angled parking on Bayview Avenue would be provided and include ABAAS spaces flanking the Memorial.

Vegetation

- Most of the existing trees in the park would remain. The Austrian pines would remain around the base of the Memorial until the plaza rehabilitation begins. Construction would require that the Austrian pines be removed. They would be replaced within this alternative with deciduous shade trees. The grass berms would be stabilized with low-growing shrubs or groundcover. Character and size of the trees, shrubs and or groundcovers associated with the Memorial column, plazas, and berms would follow recommendations in the CLTP.
- The tall birches currently in the loop drive island would be removed in order to allow better visual connection from the park entrances to the visitor center. New vegetation in the island would include colorful annuals, perennials, and grasses.
- Proposed trees associated with the entrance sequence through the Peace Garden would provide shade and enclosure accentuating the axial relationship of the pedestrian nodes within the Peace Garden. Character and size of the trees would follow recommendations in the CLTP.
- Proposed trees associated with the visitor center would direct views to the visitor center, provide seasonal color, and retain the viewshed from the orientation plaza to the Memorial column. The trees would be deciduous and smaller than shade trees in the Peace Garden. Character and size of the trees would follow recommendations in the CLTP.
- Proposed trees associated with the preservation of tree massing along the east and west boundaries of the historic core would reflect characteristics of the existing tree plantings and function to augment the sense of definition of the historic Memorial and its

landscape setting. Character and size of the trees would follow recommendations in the CLTP.

Buildings and Structures

- Open-air pavilions flanking the rear exit of the visitor center would provide direct access to a node for new interpretive waysides. These features would expand outdoor programs and events.
- Upper plaza paving would be granite and brick, based on the original Freedlander plan as described in the CLTP.
- Upper plaza panels would be retained and maintained with grass, following recommendations from the CLTP.

Selection of the NPS-Preferred Alternative

The preferred alternative emerged from presentation of the action alternatives during two public scoping sessions and conference calls and reviews with park staff. Design sketches and comments from these sessions suggested the preference for Alternative 3. This alternative would preserve the designed historic landscape and retain many of the rectilinear sidewalks currently within the park. Additional sidewalks would be introduced, supporting the symmetry of the original Beaux Arts design intent for the Memorial and its landscape setting. Within the designed landscape, Alternative 3 would afford visitors expanded interpretation through wayside exhibits at the visitor node associated with the visitor center and at the open-air pavilions. Major goals of the park would be addressed including: ABAAS accessibility to both Memorial plazas, the circulation system, and all buildings except the Memorial column; a formal and welcoming entrance to the park through the Peace Garden; black powder magazine and buffer in compliance with regulations; and extended circulation allowing connections and access to the Memorial and integration of the entire park into the visitor experience.

Mitigation

The National Park Service places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts associated with making a change within a historic landscape. To help ensure the protection of natural and cultural resources and the quality of the visitor experience at Perry's Victory and International Peace Memorial, protective measures would be implemented as part of the preferred alternative (See Appendix A: Mitigation Measures). The NPS would implement an



Figure 4-13: Stormwater management will be addressed with mitigation measures during implementation of the preferred alternative. CHG



Figure 4-14: Drainage and separation of utility pipes will be addressed with mitigation measures during implementation of the preferred alternative. CHG

appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results (Figures 4-13 and 4-14).

Affected Environment

This section specifically discusses the resources potentially impacted by implementing the proposed No Action and Action alternatives. The resources discussed below were identified and described as impact topics in Chapter 1 of this document. Identification was based on: issues raised by agencies and the public during scoping; existing site conditions; federal laws, regulations and Executive Orders; National Park Service (NPS) Management Policies 2006; topics specified in Director's Order 12 and Handbook; and park specific resource information.

Natural resources examined in detail include: geology and soils; water resources/floodplains; vegetation; wildlife; and threatened and endangered species. Cultural resource topics evaluated include: historic buildings and structures; cultural landscapes; and historic viewsheds. The remaining topics examined in detail include visitor use and experience and human health and safety.

Natural Resources

Geology and Soils

Ottawa County lies entirely within the glaciated portion of Ohio, and thus its soils are post-glacial in origin. Most of the county, including South Bass Island, lies in the lake plain of glacial Lake Maumee. The lake plain sediments of which the soils are formed are of variable thickness and are underlain by glacial till, which is further underlain by limestone. The dominant limestone outcrops occur primarily in the county's western peninsula and in the islands.² The surface of South Bass

² Musgrave, Donald K., and George D. Derringer, *1985 Soil Survey of Ottawa County, Ohio*, Soil Conservation Service, U.S. Department of Agriculture, Washington, D.C.

Island is generally flat (one to six percent slope), though limestone outcrops and knolls are present.

The soils of South Bass Island are of the Castalia-Milton association. These soils are generally well-drained, moderately deep, and nearly level to gently sloping. Castalia soils were formed in residuum from fractured limestone and in glacial drift in voids in the bedrock. Castalia soils are very stony, characterized by rapid permeability and low water capacity. Milton soils are characterized as loamy and clayey glacial till over limestone bedrock. Permeability is moderately slow and water capacity is low. Agriculturally, Castalia-Milton soils are best used for orchards, vineyards, and brush.³

The majority of the soils present within the boundaries of Perry's Victory and International Peace Memorial are Udorthents which appear as deep, nearly level, and gently sloping soils in cut and fill areas. Earthmoving and grading have mixed or removed the original topsoil and subsoil. The remaining soil is typical of the subsoil and substratum of adjacent soils, Milton silt loam and Castalia very stony, fine sandy loam. In fill areas, such as the Memorial grounds, the soil characteristics are more variable. On the eastern end of the grounds, the topsoil is approximately 6 inches deep, with 18-inch clayey subsoils. Runoff is medium to rapid and hard rains seal the surface in poorly vegetated areas. A seasonally highwater table occurs in depressed or bowl-shaped areas.⁴

Perry's Victory and International Peace Memorial is sited on a low and narrow isthmus (or tombolo) that was originally swampy land. A tombolo is a deposition landform created by wave refraction and diffraction. Since the site was selected in 1911,

an almost continuous process of leveling and filling has resulted in a flat and uniform grade. The lowest elevation occurs in the lawn on the west side of the property, just northeast of the superintendent's residence; the highest elevation occurs outside the historic core along the northeast boundary of the park.⁵

Water Resources, Floodplains, and Wetlands

Perry's Victory and International Peace Memorial is located on South Bass Island in Lake Erie. The lake is the dominate water resource affecting the park. The level of Lake Erie fluctuates generally between one and three feet during the year. When the lake rises to an elevation between 571 International Great Lakes Datum (IGLD) and 573 IGLD, flooding can result in varying degrees of damage to the memorial, grounds, and facilities. Storms are a problem, combining high lake levels with strong winds, thus driving large amounts of water onto the Memorial grounds (Figures 4-15 and 4-16). Storm damage frequently results in the deposition of debris on the grounds, as well as standing water within the Memorial structure and other park structures. Washouts have occurred at the southwest end of the seawall abutting the village beach and continue to occur after the most recent construction and repair to the south seawall.⁶

3 Musgrave, Donald K., and George D. Derringer, *1985 Soil Survey of Ottawa County, Ohio*, Soil Conservation Service, U.S. Department of Agriculture, Washington, D.C.

4 National Park Service, *Perry's Victory and International Peace Memorial, Ohio: Development Concept Plan Revision, Interpretive Prospectus*, 1992, National Park Service, U.S. Department of the Interior, 10.

5 Williams, Sherda K., and Susan Calafate Boyle, *Perry's Victory and International Peace Memorial Put-in-Bay, Ohio: Cultural Landscape Report*, 1994, National Park Service, Midwest Regional Office, Planning and resource Preservation, Omaha, Nebraska, 61.

6 National Park Service, *Perry's Victory and International Peace Memorial, Ohio: Development Concept Plan Revision, Interpretive Prospectus*, 1992, National Park Service, U.S. Department of the Interior, 11-12.



Figure 4-15: Lake Erie south of the park as seen from the Ferry as it departs from South Bass Island. The Memorial column is in the distance. CHG

Most of the Memorial lies within the 100 and 500-year floodplains. Only the easternmost portion of the Memorial and a small corner at the southwest boundary are outside the 500-year floodplain.⁷ Most standing water accumulating on the site drains in approximately 24 hours. However, the soil in certain low-lying areas of the site remains saturated for more than a week after heavy rains.

Most of the park boundary is within the regulated 100-year floodplain. A 100-year floodplain does not mean that such a flood is likely to occur every 100 years; rather, it means that there is a one-hundred or 1% chance of such a flood occurring in any given year. The functional value of the park



Figure 4-16: Put-in Bay and the expanse of Lake Erie as seen from the observation platform. CHG

floodplain is minimal in that the area has already been developed on many layers of fill, with the construction of the north and south seawalls, the Memorial and grounds, circulation, visitor center, and housing/administration structures. Due to these man-made features and years of excavation and filling, many of the natural functions of the floodplain cannot be carried out, including providing flood storage, providing flood conveyance, providing habitat, reducing excessive erosion, trapping sediments, and removing pollutants from waters.

U.S. Fish and Wildlife Service National Wetland Inventory (NWI) maps were consulted for classification of wetlands in the park. There are no wetlands identified in the area. Additionally, the Ohio Department of Natural Resources, Division of Natural Areas and Preserves, was consulted for identification of state-listed species including plants found in wetlands. State-listed plants were recorded from the inshore waters of Put-in-Bay and were found on mud flats along the shoreline, but not within the park.

Vegetation

The park is landscaped with cultivated lawn grasses and ornamental shrubs and trees and is maintained regularly. The grounds have been overlaid with fill material many times since the



Figure 4-17: The historic core is characterized by a horizontal ground plane with an expanse of turf grass. There are deciduous trees west of the Memorial and the Austrian pines are visible around the Memorial plazas. CHG

⁷ Ibid, 11.

establishment of the Memorial. Due to poor drainage on the site, standing water has caused the propagation of noxious weeds and undesirable broad-leaved grasses, which create patches of grasses differing in colors and textures.

Vegetation, besides the large expanses of lawn on either side of the Memorial, consists of mature shade trees in clusters or in scattered locations on the site (Figure 4-17). Most of the larger trees present on the site are deciduous and located on the eastern edge of the grass lawn. “It is only on the eastern boundary that the vegetative mass intended to frame the view of the Memorial remains discernable. The loss of vegetative mass on the east and west boundaries negatively impacts the feeling of enclosure evoked by the original design.”⁸

There are fifteen Austrian pines growing on the sloped berm around the Memorial plazas. There are all that remain of forty pines specified in the landscape design and planted in 1925. The remaining pines have outgrown their original designed size, and pruning efforts meant to restrain upward growth has robbed them of the clipped, conical shape specified by Freedlander. The remaining trees are reaching the end of their natural life and are scheduled for removal during



Figure 4-18: Colorful perennials and annuals are located in the visitor center/park administration management zone. Scattered deciduous trees are also prevalent in the landscape. *CHG*

construction associated with the rehabilitation of the plaza.⁹ Tree clusters are also located around the Men’s Dormitory and the Ranger Operations Center in the southwest corner of the historic core. More recent plantings include shade trees associated with the visitor center building, visitor center parking lot, and Park headquarters. Throughout the visitor services zone, there are large beds of colorful annuals and perennials (Figure 4-18).

Wildlife

Mammals present on South Bass Island include: raccoon (*Procyon lotor*); muskrat (*Ondatra zibethicus*); mouse (*Mos musculus*); eastern cottontail (*Sylvilagus floridanus*); eastern gray squirrel (*Sciurus carolinensis*); black squirrel (*Sciurus meridionalis*); and red fox (*Vulpes vulpes*). Birds observed nesting on the memorial grounds include robins (*Erithacus rubecula*), grackles (*Quiscalus quiscula*), and song sparrows (*Melospiza melodia*). Additionally, other species observed feeding on the memorial grounds, include: killdeer (*Charadrius vociferous*); crow (*Corvus corax*); downy woodpecker (*Picoides pubescens*); red-eyed vireo (*Vireo olivaceus*); starling (*Sturnus vulgaris*); red-winged blackbird (*Agelaius phoeniceus*); double-crested cormorants (*Phalacrocorax auratus*); and yellow-shafted flicker (*Colaptes auratus*). Purple martins (*Progne subis*) are present at Scheeff East Point Nature Preserve on South Bass Island. These birds east of the Rockies only nest in man-made housing which include both natural and plastic gourds. The island location in Lake Erie provides plenty of flying insects for food and open habitat, at least 40 feet from tall trees (where large avian predators scout for smaller prey). Incidental visitors to the memorial include migrating mallard (*Anas platyrhynchos*) and Canada geese (*Branta canadensis*).¹⁰

Numerous species of amphibians and reptiles have been recorded on South Bass Island and in

8 National Register of Historic Places Registration Form, (2014), Section 7, page 12.

9 Ibid.

10 National Park Service, 1992 *Perry’s Victory and International Peace Memorial, Ohio: Development Concept Plan Revision, Interpretive Prospectus*. National Park Service, U.S. Department of the Interior, 8.

adjacent waters. Several freshwater mussel species (*Margaritifera margaritifera*) inhabit the waters around the memorial. Ninety-five species of fish have been recorded for Ottawa County, a few include: alewife (*Alosa Pseudoharengus*); cisco (*Coregonus artedii*); lake whitefish (*Coregonus clupeaformis*); darters (*Sympetrum Striolatum*); sunfish (*Mola mola*); walleye (*Sander vitreus*); small mouth bass (*Micropterus dolomieu*); and Yellow perch (*Perca flavescens*).¹¹

Rare, Threatened, and Endangered Species

The U. S. Fish and Wildlife Service (USFWS) Ohio Ecological Services has identified the federally-listed species, proposed species, candidate species and designated and proposed critical habitat present or potentially present at Perry's Victory and International Peace Memorial. USFWS offered the comments pursuant to the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347), and the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1544).

Species of Concern. The project lies within the range of the monarch butterfly (*Danaus plexippus*). The USFWS has determined that listing under the ESA may be warranted and is currently conducting a status review of the monarch. Monarch butterflies are found throughout Ohio and some populations migrate vast distances across multiple generations each year. The Lake Erie islands provide important migration and stopover habitat for monarchs as they fly between the U.S., Mexico and Canada—a journey of over 3,000 miles.

The project boundary lies within the range of the Lake Erie watersnake (*Nerodia sipedon insularum*), a state endangered species, and a Federal species of concern that was recently removed from the Federal list of Endangered and Threatened Wildlife and Plants due to recovery. The watersnake is found on the offshore islands and in adjacent water of Lake Erie. Watersnake summer habitat consists mainly of rocky shorelines with adjacent vegetation and shoreline structures such

as crib docks. Winter hibernation habitat for the watersnake includes the island interior and the shoreline/vegetation interface.

Federally Listed Species. All projects in the State of Ohio lie within the range of the federally endangered Indiana bat (*Myotis sodalist*) and the federally threatened northern long-eared bat (*Myotis septentrionalis*).

In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost and forage 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. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as building, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

The proposed project lies within the range of the Kirtland's warbler (*Setophaga kirtlandii*), a federally listed endangered species. The Kirtland's warbler is a small blue-gray songbird with a bright yellow breast. This species migrates through Ohio in the spring and fall, traveling between its breeding grounds in Michigan, Wisconsin, and Ontario and its winter grounds in the Bahamas. While migration occurs in a broad front across the entire state, approximately half of all observations in Ohio have occurred within 3 miles of the shoreline of Lake Erie. During migration, individual birds usually forage in shrub/scrub or

¹¹ *Ibid.*

forested habitat and may stay in one area for a few days.

Cultural Resources

Historic Buildings and Structures

Perry's Victory and International Peace Memorial is nationally significant under Criterion C in the area of architecture for embodying the distinctive characteristics of a type and period and because it represents the work of a master. The centerpiece of the Memorial is the massive Doric column of Milford pink granite topped by an immense bronze lantern. Its rotunda, located within the granite shaft, features a domed ceiling, above which an elevator transports visitors to the observation platform. The surrounding plazas are constructed of reinforced concrete faced with granite. The upper and lower plazas are connected by a grand staircase, that occupies the full length of both plazas. The Memorial Column, plazas, and connecting stairs are considered one contributing feature.¹² Additional structures or small-scale features associated with the Memorial that are also contributing include: granite walls associated with the plazas; granite benches and urns located at the corners of the upper plaza; and the structured berm surrounding the lower plaza (Figure 4-19). The Memorial and its grounds are an excellent example of the harmony of building and landscaping that is integral to the Beaux Arts style in America, with its monumental classicism in architecture set within a designed, formal landscape. Although the entire design for the site by architects Joseph H. Freedlander and Alexander D. Seymour was never completely executed, the portions that were constructed have generally retained their integrity and are true to the formal, axial design and classical architecture typical of Beaux Arts style.

The Superintendent's Residence and garage were built in 1951. A Neo-Colonial Revival-style building, the Superintendent's Residence, now the Men's Dormitory for seasonal employees, is a story-and-a-half, compound-plan building,



Figure 4-19: The upper plaza of the Memorial forms its base. Granite urns are in each corner of the upper plaza. *CHG*

constructed over a crawlspace, with a central door and stoop on the front side of the main block and on the west (and only) wing of the building. It remains in its original location and in close proximity to the Ranger Operations Center. Though it is no longer used as the Superintendent's Residence, it continues to function in its historic use as a residence for park personnel in its capacity as a Men's Dormitory for seasonal employees. It speaks to the historic and continuing administrative needs of the park. For these reasons, it is a contributing building on the historic site. The original garage associated with the building has been demolished. The gable-roofed storage building now adjacent to the Men's

¹² National Register of Historic Places Nomination Form, Section 7 page 15-16.



Figure 4-20: Memorial column is seen in the distance. The South seawall forms the south boundary of the historic core. CHG

Dormitory, does not constitute a replacement of the original garage and is a non-contributing feature of the site.¹³

The north and south seawalls are listed in the National Register of Historic Places as non-contributing due to the significant changes made to them over the years. The sidewalk at the south seawall is also non-contributing due to its change in locations when the eastern half of the south seawall was relocated in 1977.¹⁴ The seawalls, however, are compatible because they replaced walls that defined the original boundaries of the

historic site and help retain the original design intentions of the architects (Figure 4-20).

Cultural Landscapes

The flat, grassy expanse of the site is defined on the east by a ragged treeline, bisected by the paving of the memorial plazas, crisscrossed by walkways to facilitate visitor traffic, and punctuated by specimen trees and groups of tree plantings. The most prominent vegetative feature of the site, however, is the flat, grassed lawn, a mixture of grasses, clover, and weeds watered by an irrigation system. The architects specified a mixture of several types of grasses and white clover in the earliest landscape design, but it is unknown whether that was ultimately the mix planted or if any of the original grasses remain. Nevertheless, the wide, flat horizontal expanse of grass as a visual counter to the verticality of the memorial column was integral to the original design concept. It exists today essentially as designed.¹⁵

In addition, the planter beds located on the upper plaza were specified as beds of grass, called grass panels in the original design. As grass panels, they would carry the overall effect of the horizontal plane of the lawn onto the plaza. Although planted in barberry hedging between 1925 and 1933, they have been planted in grass, per the original design, since the removal of the barberry hedges beginning in the mid-1930s. Planting of grass in the planter beds has been the historic treatment since the mid-1930s and matches the historic design.¹⁶

Vegetation, besides the grassy expanses of lawn on either side of the Memorial, consists of mature shade trees in clusters or in scattered locations on the site. Most original vegetation was cleared for construction of the column in 1912. The architects apparently intended that some of the existing trees would be left standing after the site was cleared, but there is no photographic evidence that this was done. However, some of the trees recorded in

13 Harvey, Deborah E. Outside The Box, LLC, *National Register of Historic Places Registration Form for Perry's Victory and International Peace Memorial*, (2014), Put-in-Bay, Ohio. Section 7, page 16.

14 Ibid. Section 7, page 13-14.

15 Ibid. Section 7, page 11.

16 Ibid.

1994 as part of the *Cultural Landscape Report* appear to be of a size that could indicate that they date from before 1912. Although the exact ages of these trees were not determined, all the remaining trees should be considered features associated with the Period of Significance due to their probable age based on their size.¹⁷

Perry's Victory and International Peace Memorial is locally significant under Criterion C in the area of landscape architecture for embodying the distinctive characteristics of a type and period adapted to the special landscaping needs of an island in a northern lake. Freedlander and Seymour created a Beaux Arts landscape design to complement the Beaux Arts architectural style of the Memorial building(s) (Figure 4-21). The designed cultural landscape of the Perry's Victory and International Peace Memorial retains integrity of location, design, setting, materials, workmanship, feeling, and association¹⁸ (Figure 4-22).

Historic Viewsheds

The architects of the memorial building, Joseph Henry Freedlander and Alexander Duncan Seymour, planned the arrangement of the grounds surrounding it to create the views, vistas, and viewsheds. They arranged the landscaping and small-scale features of the grounds to create artistic views of the Memorial as well as views from the Memorial. The original plan organized the landscape of the grounds to focus all visual attention on the column. The unobstructed views across the grass lawns were contrived by the architects to wrest an impression of vast space from a relatively small plot of ground.¹⁹ These views from inside the park to the Memorial column are intact today (Figures 4-23 and 4-24).

The most striking and significant view of the Memorial, as planned by the architects, is the approach from the lake on the north, where the



Figure 4-21: View to the cultural landscape west of the Memorial column and plazas. Large expanse of lawn covers the horizontal ground plane that is part of the original design intent for the Memorial and its landscape setting. CHG

Memorial column appears to rise almost directly from the waters of Lake Erie. This view looking toward the Memorial, is currently protected by the U.S. Army Corps of Engineers, which prevents



Figure 4-22: View to the cultural landscape east of the Memorial column and plazas. Lawn continues to the east, and trees form a sense of enclosure that help define the historic core. CHG

boats from permanently anchoring in the harbor in front of the Memorial.

The view northwest from the Memorial observation platform near the top of the column

17 Sherda K. Williams and Susan Calafate Boyle, *Perry's Victory Memorial Cultural Landscape Report for Perry's Victory and International Peace Memorial, Put-in-Bay, Ohio* (Denver: United States Department of the Interior, National Park Service, Denver Service Center, 1994), 96.

18 Harvey, Deborah E., Outside The Box, LLC, *National Register of Historic Places Registration Form for Perry's Victory and International Peace Memorial*, (2014), Put-in-Bay, Ohio. Section 7, page 11.

19 Ibid. Section 7, page 10.



Figure 4-23: Historic photograph (1950) from the park archives shows a grand view from Bayview Avenue toward the Memorial. *PEVI Archives*

affords the best opportunity to see the area where the Battle of Lake Erie was fought in 1813. Obstructions are starting to occur from extension of existing boat docks and construction of new docks in Put-in-Bay which is not within the boundaries of the park or under the control of the National Park Service.²⁰

Visitor Use and Experience

Affected Environment

The actions described in the alternatives are within Perry's Victory and International Peace Memorial which is located on South Bass Island in Lake Erie near the U.S. – Canadian border. The site lies within the Village of Put-in Bay, Township of Put-in-Bay, in Ottawa County, Ohio. Port Clinton and Sandusky are the closest mainland communities.

²⁰ Ibid.



Figure 4-24: Approximately the same view in 2017, with powerlines cluttering the grand view to the Memorial from Bayview Avenue. *CHG*

Visitors to the park reach South Bass Island by ferry or private boats. There is a small air strip on the island with small airplane service, but this mode of transportation is not for large scale visitation to the park. Most visitors are from the state of Ohio.²¹

Visitor Experience and Interpretation:

Perry's Victory and International Peace Memorial has two visitor contact stations—the memorial and the visitor center—and 25 acres of groomed landscape between two seawalls. When open, the memorial is the main attraction for park visitors with approximately 150,000 visiting each season. The visitor center is now the primary contact station. Rangers, volunteers, and Eastern National associates welcome visitors, provide orientation to the memorial and the island, and deliver informal

²¹ *Perry's Victory and International Peace Memorial Visitor Study*, University of Idaho, Social Science Program U.S. Department of the Interior, National Park Service, 2009, 43.

interpretation. The visitor center has an auditorium with a 15-minute DVD presentation on the battle of Lake Erie.

The core interpretive programs for Perry's Victory are children's programs offered twice daily, hourly talks, evening programs three times a week, living history encampments, black powder musket firing demonstrations on weekends and cannonade firings one weekend a month. The park also hosts several special events throughout the summer months, each with interpretive/educational components. Interpretive staff present programs off-island at Ohio and Michigan schools, civic

groups, and other venues. The park continues to expand its education and community outreach.²²

Visitors enter the Memorial column through the rotunda, where six officers from the War of 1812 are interred. Once inside the rotunda, visitors travel to the top of the column via steps and an elevator to a viewing platform (Figure 4-25). From this platform visitors can see across Lake Erie to the site of the naval battle (Figure 4-26). At the visitor center, a film can be viewed, along with exhibits interpreting the Battle of Lake Erie and the building of the Memorial column and plazas. In summer months, the landscaped grounds of the park provide an open space that serves as a calm, contemplative escape from the otherwise

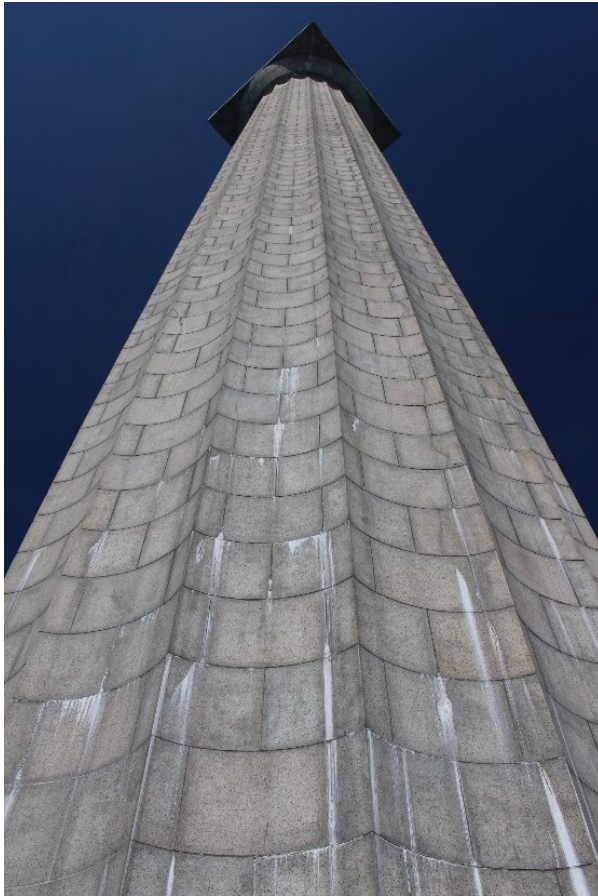


Figure 4-25: View toward the top of the column as seen from the plaza. A large doorway marks the entrance to the column. CHG

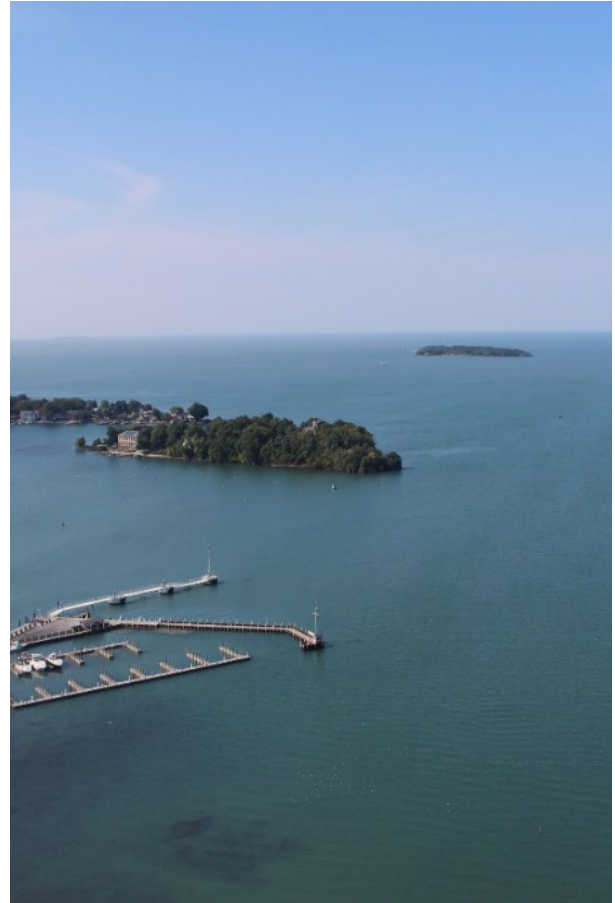


Figure 4-26: View from the observation platform at the top of the Memorial column. Interpretive maps are provided on the platform. CHG

22 *Perry's Victory and International Peace Memorial Long-Range Interpretive Plan*, Harpers Ferry Center, U.S. Department of the Interior, National Park Service, October 2011. p 21.

energetic, busy island and as a recreational space for both visitors and local island residents.²³

Human Health and Safety

Numerous conditions at the park require continual attention by management personnel to ensure the safety of visitors. Park personnel are vigilant about visitor safety issues such as the potential for severe summer weather—heat and humidity, storms and flooding, and the presence of biting insects. Ongoing maintenance of pedestrian sidewalks and roads, exhibits, site furnishings, buildings, and vegetation are only part of the comprehensive work required to ensure the health and safety of the public. Park staff monitor use of golf carts on the pedestrian sidewalks, a potential safety hazard for visitors strolling throughout the park. Staff is also responsible for the safety of visitors once they are inside the Memorial column and reach the observation platform.

Vegetation management is ongoing and requires removal of fallen limbs and debris. Maintenance of trees is essential to prevent hazardous conditions for visitors. The park is also vigilant about the safety of visitors entering the park at traffic intersections and crossing Bayview Avenue north of the Memorial in order to access the north seawall.

Environmental Consequences

The National Environmental Policy Act requires that environmental documents discuss the environmental impacts of a proposed federal action, feasible alternatives to that action, and adverse environmental impacts that cannot be avoided if a proposed action is implemented. In this case, the proposed federal action is the implementation of treatment recommendations contained in the Cultural Landscape Treatment Plan (CLTP) for Perry’s Victory and International Peace Memorial and the identification and

disclosure of potential impacts and effects of the developed alternatives in order to fulfill all compliance requirements. This chapter analyzes and compares the environmental impacts on natural resources, cultural resources, visitor use and experience, and human health and safety. This analysis compares the baseline of the “No Action” alternative against the action alternatives to determine positive and adverse outcomes. By examining the environmental consequences of the alternatives on an equivalent basis, decision makers can evaluate which approach would create the most desirable combination of benefits with the fewest adverse effects on the park.

This section begins with a brief explanation of general methods followed by a discussion of how cumulative impacts are analyzed for the alternatives. Following this section, the impact analysis is presented. Each of the alternatives, including the no action alternative (continuation of current management), is analyzed for adverse or positive changes that would occur to the existing conditions of each impact topic as presented in the affected environment chapter of this document. After describing the impacts of the alternatives, the cumulative impacts on each impact topic are discussed.

General Methods and Assumptions for Analyzing Impacts

This section describes the environmental impacts for each alternative. The analysis assumes that the monitoring and mitigation measures identified in the alternative development section of this document would be implemented for the action alternative. Overall, the National Park Service based its impact analyses and conclusions on review of existing literature and park studies, information provided by experts within the park and other NPS personnel, other agencies, professional judgment, park staff insights, and public input.

23 *Foundation Document: Perry’s Victory and International Peace Memorial*, U.S. Department of the Interior, National Park Service, October 2012. p 2.

In accordance with Council of Environmental Quality (CEQ) regulations, direct, indirect, and cumulative impacts are described (40 CFR 1502.16), and the impacts are assessed in terms of context and intensity (40 CFR 1508.27). Where appropriate, mitigating measures for adverse impacts are described and incorporated into the evaluation of impacts. The specific methods used to assess impacts for each resource may vary and, therefore, are described as part of each impact topic.

The following terms are used in the discussion of environmental consequences to assess the impact intensity threshold and the nature of impacts associated with each alternative.

- **Type.** Impacts can be positive or adverse. A positive impact is an impact that would result in a favorable change in the condition or appearance of the resource. An adverse impact is an impact that causes an unfavorable result to the resource as compared with the existing conditions.
- **Context.** The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, the locality and the park. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance usually would depend on the effects in the locale rather than in the world as a whole. In many cases, the term “localized” is used, intending to provide the context that impacts would only occur within a relatively small area (i.e., a few acres) as opposed to throughout the park or into neighboring areas. The term “local” is used to reference the entire park. Both short- and long-term effects are also relevant.
- **Duration.** Duration of impact is analyzed independently for each resource because impact duration is dependent on the resource being analyzed. Impacts may last for the implementation period, a single year or growing season, or longer. Impact duration is described as short term, long term, or permanent for each resource. For the purposes of this analysis, short-term and long-term impacts are defined for each resource.
- **Direct and Indirect Impacts.** Effects can be direct, indirect, or cumulative. Direct effects are caused by an action and occur at the same time and place as the action. Indirect effects are caused by the action and occur later or further away but are still reasonably foreseeable. Direct and indirect impacts are considered in this analysis. Cumulative impacts are considered in this analysis.
- **Intensity.** This refers to the severity of impact. The following should be considered in evaluating intensity:
 - Impacts that may be both positive and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be positive.
 - The degree to which the proposed action affects public health or safety.
 - Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.
 - The degree to which the effects on the quality of the human environment are likely to be highly controversial.
 - The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.
 - The degree to which the action may establish a precedent for future actions having significant effects or represents a decision in principle about a future consideration.
 - Whether the action is related to other actions that have individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to

anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

- The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in, or eligible for listing in, the National Register or may cause loss or destruction of significant scientific, cultural, or historical resources.
- The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
- Whether the action threatens a violation of federal, state, or local law or requirements imposed for protection of the environment.

For each impact topic analyzed, an assessment of the potential impacts according to context and intensity is provided in the “Conclusion” section that follows the discussion of the impacts under each alternative. The intensity of the impacts is presented using the relevant factors from the preceding list. Intensity factors that do not apply to a given resource topic and/or alternative are not discussed.

Climate Change

The impacts of climate change on Perry’s Victory and International Peace Memorial are not expected to vary by alternative, and the lack of certainty about regional climate change adds to the difficulty of predicting how these impacts would be realized. Furthermore, management actions that are inherently part of each alternative would not fundamentally change with the anticipated added impacts of climate change. Climate change is one factor among many that cause similar outcomes between the alternatives, so management actions would not likely be taken due to climate change alone. Given this complexity, the potential influences of these changes on the park

environment are not analyzed in detail with respect to each alternative in this chapter. Please refer to the discussion of carbon footprint topic in the Chapter 1 section, “Impact Topics Considered but Not Retained for Full Analysis.”

In June 2015, NPS developed and distributed a brief entitled “Park Visitation and Climate Change.” The brief states that:

climate change will affect not only natural and cultural resources within national parks, but also visitation patterns. Where, when, and how many people visit parks is likely to change with continued warming. Understanding potential change in visitation based on historical trends and future patterns of temperature change is a crucial first step for park managers and local communities to anticipate, plan for, and proactively affect future visitation. A changing climate is likely to have cascading and complex effects on park visitation, management, and local economies. Parks and surrounding communities will need to adapt to both the challenges and opportunities posed by changing visitation.”

Park staff will use this information and further research to base any required management procedures due to changes in visitation. Further concerns associated with climate change are the potential rise in the water levels of Lake Erie and potential effects of coastal wave action and flooding.

Impacts to Cultural Resources and Section 106 of the National Historic Preservation Act

In this EA, impacts on cultural resources are described in terms of type, context, duration and intensity, which is consistent with the regulations of the Council on Environmental Quality (CEQ) that implement the National Environmental Policy Act (NEPA). These impact analyses are intended, however, to comply with the requirements of both NEPA and Section 106 of the National Historic Preservation Act. In accordance with the Advisory Council on Historic Preservation’s regulations implementing Section 106 (36CFR Part 800, *Protection of Historic Properties*), impacts on

cultural resources were also identified and evaluated by (1) determining the area of potential effects; (2) identifying cultural resources present in the area of potential effects that are either listed in or eligible to be listed in the National Register of Historic Places; (3) applying the criteria of adverse effect to affected National Register eligible or listed cultural resources; and (4) considering ways to avoid, minimize, or mitigate adverse effects.

Under the Advisory Council's regulations, a determination of either *adverse effect* or *no adverse effect* must be made for affected National Register listed or eligible cultural resources. An *adverse effect* occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion in the National Register, e.g., diminishing the historic integrity (or the extent to which a resource retains its historic appearance) of its location, design, setting, materials, workmanship, feeling, or association. Adverse effects also include reasonably foreseeable effects caused by the alternatives that would occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5, *Assessment of Adverse Effects*). A determination of *no adverse effect* means there is an effect but the effect would not diminish the characteristics of the cultural resource that qualify it for inclusion in the National Register of Historic Places

CEQ regulations and the National Park Service's *Conservation Planning, Environmental Impact Analysis and Decision Making* (Director's Order #12) also call for a discussion of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact, e.g., reducing the intensity of an impact from major to moderate or minor.

Any resultant reduction in intensity of impact due to mitigation; however, is an estimate of the effectiveness of mitigation only under NEPA. It does not suggest that the level of effect as defined by Section 106 is similarly reduced. Cultural resources are nonrenewable resources, and adverse effects generally consume, diminish, or destroy the original historic materials or form, resulting in a loss in the integrity of the resource that can never be recovered. Therefore, actions

determined to have an adverse effect under Section 106 may be mitigated but the effect can remain adverse.

A section 106 summary is included, as appropriate, in the impact analysis sections. Section 106 summary is an assessment of the effect of the undertaking (implementation of the alternative) on National Register of Historic Places eligible or listed cultural resources only, based upon the criterion of adverse effect and no adverse effect found in the Advisory Council's regulations.

Cumulative Impacts Analysis Method

Definition

The CEQ regulations require assessment of cumulative impacts in the decision-making process for federal projects. A cumulative impact is defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions" (40 CFR 1508.7). Cumulative impacts are considered for all alternatives, including the no-action alternative. Cumulative impacts can result from individually minor, but collectively positive or adverse actions taking place over a period of time.

Methods for Assessing Cumulative Impacts

Cumulative impacts were determined by combining the impacts of the action alternative and the no action alternative with other past, present, and reasonable foreseeable future action. Past actions include activities that influenced and affected the current conditions of the environment near the project area. Ongoing or reasonably foreseeable future projects near the park or the surrounding region might contribute to cumulative impacts. The geographic scope of the analysis includes actions in the project area as well as other actions in the park or surrounding lands, where overlapping resource impacts are possible. Once identified, past, present, and reasonably foreseeable actions are then assessed in conjunction with the impacts of the alternatives to

determine if they would have any added adverse or positive impacts on a particular resource, human health and safety, or visitor use and experience. The impacts of past, present and reasonably foreseeable actions vary for each resource. Cumulative impacts are considered for each alternative and are presented in the environmental consequences discuss for each impact topic.

Actions and Projects Inside Perry's Victory and International Peace Memorial

In order to determine the potential cumulative impacts, the following existing and anticipated present and future projects at Perry's Victory and International Peace Memorial were taken into consideration:

- Past, present, and ongoing vegetation management including: mowing the expanse of lawn in the historic core and the housing/maintenance management zones and pruning, shearing, and general tree and shrub maintenance;
- Past, present and future projects associated with expanded interpretation and placement of interpretive waysides and associated collateral infrastructure such as paving and viewsheds;
- Past, present and future projects associated with improvements to accessibility to primary visitor use facilities;
- Currently in progress (2017 season) is repointing of the Memorial column – PMIS 210919. With completion of this project, the memorial column itself should be in good condition for the long term.
- Upper plaza: Value Analysis (PMIS 200284) was completed in 2015. This is a high priority item for the park, so that the Upper Plaza can be returned to full public use. The park may also implement mechanical improvements (e.g., geothermal heating) as part of the same project.

- Seawalls: The condition assessment report completed in February 2017; park would like to have this as a Line Item Construction project to repair and restore the north (1900') and south (1500') seawalls within the park in the next five years.
- Park Accessibility Plan, currently underway and scheduled to be completed in 2018.

Actions and Projects Outside Perry's Victory and International Peace Memorial

One specific project outside Perry's Victory and International Peace Memorial was identified by park staff. A boat dock was recently constructed immediately south of the bathing beach. Reasonably foreseeable impacts from additional projects outside the park may be associated with road expansion along the park boundaries and development of the land that surrounds the park.

Natural Resources

Soils and Geology

ALTERNATIVE 1: (NO ACTION)

Impacts

Within this alternative, there would be no changes to current conditions. Existing management or maintenance strategies would remain in place and include controlling erosion and deposition of sediment, limiting visitor access, and avoiding construction of new features or facilities that might cause soil conditions or stability to change or accelerate. Current mitigation measures for sensitive natural resources would remain in place and include soils and geology. There would be no adverse impacts to soils and geology resources with the implementation of this alternative.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None would have an adverse impact on soils and geology. The incremental impact of the no action alternative

when added to other past, present, and reasonably foreseeable future actions would be negligible.

Conclusion

The No Action Alternative would not modify the existing soils or geology conditions at Perry's Victory and International Peace Memorial. No adverse impacts to soil and geologic resources would be expected.

ALTERNATIVE 2: (PROPOSED ACTION)

Impacts

Due to construction projects introduced within this alternative, soils would be disturbed by the development, but cut and fill activity would be minimal and spread over the park acreage. In Alternative 2, the introduction of impervious materials would exceed that of Alternative 3. The soils that would be disturbed by demolition and development are extensive but are fill soils, previously added on park management zones and specifically in the historic core. Cut and fill amounts would be balanced to the extent possible to minimize the need to import or export soils during construction. Additionally, under Alternative 2, the cut and fill of soils on the grounds would be designed to result in no net change in the soil loads surrounding the Memorial. Overall, the implementation of Alternative 2 would have short-term and minor impacts on existing soil conditions at the park.

The generally flat topography of the park would be retained in Alternative 2, diminishing potential increase of erosion on the landscape. During demolition of existing sidewalks and construction of new ones, temporary impacts to soils from erosion would be minimized through of mitigation measures. Project phasing would aid in mitigation of the extent of soil disturbed at one time. (*See Mitigation Measures in Appendix A of this document.*)

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None would have an adverse impact on soils and geology. The

incremental impact of the action alternative when added to other past, present, and reasonably foreseeable future impacts would be localized by use of project phasing.

Conclusion

There would be a number of disruptions to surface soils due to the proposed actions in this alternative. The result would be short-term minor adverse impacts to soils. Most impacts would be localized due to project phasing. Long-term positive impacts to soils would be expected due soil stabilization, design of walkway alignments to avoid slopes and minimal ongoing soil erosion maintenance associated with all park project activities.

ALTERNATIVE 3: (PROPOSED ACTION NPS-PREFERRED)

Impacts

Due to construction projects introduced within this alternative, soils would be disturbed by the development, but cut and fill activity would be minimal and spread over the park acreage. The soils that would be disturbed by the development are fill soils that were previously added to park management zones, specifically the historic core. Cut and fill amounts would be balanced to the extent possible to minimize the need to import or export soils during construction. Additionally, under Alternative 3, the cut and fill of soils on the grounds would be designed to result in no net change in the soil loads surrounding the Memorial. Overall, the implementation of Alternative 3 would have short-term and minor impacts on existing soil conditions at the park.

The generally flat topography of the park would be retained in Alternative 3 diminishing the potential for erosion on the landscape. During construction, temporary impacts to soils from erosion would be minimized through implementation of mitigation measures. (*See Mitigation Measures in Appendix A of this document.*)

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or

proposed within the park. None would have an adverse impact on soils and geology. The incremental impact of the action alternative when added to other past, present, and reasonably foreseeable future impacts would be localized by use of project phasing.

Conclusion

There would be a number of disruptions to surface soils due to the proposed actions in this alternative. The result would be short-term minor adverse impacts to soils. Most impacts would be localized due to project phasing. Long-term positive impacts to soils would be expected due to soil stabilization, design of walkway alignments to avoid slopes, and minimal ongoing soil erosion maintenance associated with all park project activities.

Water Resources/Floodplains

ALTERNATIVE 1 (NO ACTION)

Impacts

Protection of floodplains would continue with the current management and maintenance strategies in place and the planned repair and restoration of the seawalls. The No Action Alternative would be a continuation of existing conditions, operations, and maintenance of the park. The functional value of the floodplain includes some flood storage, but overall its value is low because it is a relatively small area (25 acres) and contains impervious paving. This alternative would have no additional impacts on the water surface level during a flood event or on flood frequency, and the existing floodplains function would remain unchanged. Therefore, the No Action Alternative would have no adverse impacts on the 100-year floodplain within the park.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None would have an impact on water resources and floodplains. The incremental impact of the no action alternative when added to other past, present, and reasonably

foreseeable future actions would be short-term, and negligible.

Conclusion

Implementation of the No Action alternative would have no adverse impacts on water resources and floodplains and would not contribute to cumulative impacts.

ALTERNATIVE 2 (PROPOSED ACTION)

Impacts

Implementation of Alternative 2 would require ground disturbance during construction of the circulation system, the Peace Garden, pavilion structures, and housing/administration facilities. Construction would not have a measurable effect on the frequency, elevation, intensity or duration of floods, but the function of the floodplain which includes some flood storage, would be diminished, due to removal of grass cover or other vegetation during construction. Therefore, some vegetation would not be in place during construction to slow floodwater which would result in an increased risk of soil loss during a flood event. The functional value of the floodplain within the park includes some flood storage, but overall its value would be low because it is a relatively small area and contains impervious materials. In order to protect the function of the floodplain during construction, erosion and sediment control would be employed.

Proposed modification of the mostly landscaped area in the 100- year floodplain of the park would not be land contributing to the productivity of a floodplain ecosystem. The historic core and other management zones of the park have been excavated and filled due to construction of circulation and facilities. The historic core has been filled repeatedly since construction of the Memorial in 1915. Therefore, construction activities within Alternative 2 would result in short-term minor adverse impacts to surface water and floodplains. (*See Mitigation Measures in Appendix A of this document.*)

Analysis of National Wetlands Inventory information has indicated that Alternative 2 would not disturb land that contains wetlands

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None would have an impact on water resources and floodplains. The incremental impact of Alternative 2 when added to other past, present, and reasonably foreseeable future actions would be short-term and minor due to construction actions within the alternative. Short-term minor adverse impacts within Alternative 2 would contribute slightly to a cumulative minor adverse impact.

Conclusion

There would be short-term minor adverse impacts to water resources with the implementation of Alternative 2. Contributing to the minor adverse impacts are the construction of the expanded circulation system and new facilities within the park.

ALTERNATIVE 3: (PROPOSED ACTION AND NPS-PREFERRED)

Impacts

Implementation of Alternative 3 would require ground disturbance during construction of the circulation system, the Peace Garden, pavilion structures, and housing/administration facilities. Construction would not have a measurable effect on the frequency, elevation, intensity or duration of floods, but the function of the floodplain which includes some flood storage, would be diminished, due to removal of grass cover or other vegetation during construction. Therefore, some vegetation would not be in place during construction to slow floodwater which would result in an increased risk of soil loss during a flood event. The functional value of the floodplain within the park includes some flood storage, but overall its value would be low because it is a relatively small area and contains impervious materials. In order to protect the function of the floodplain during construction, erosion and sediment control would be employed.

Proposed modification of the mostly landscaped area in the 100- year floodplain of the park would not be land contributing to the productivity of a floodplain ecosystem. The historic core and other

management zones of the park have been excavated and filled due to construction of circulation and facilities. The historic core has been filled repeatedly since construction of the Memorial in 1915. Therefore, construction activities within Alternative 3 would result in short-term minor adverse impacts to surface water and floodplains. (*See Mitigation Measures in Appendix A of this document.*)

Analysis of National Wetland Inventory (NWI) information has indicated that Alternative 3 would not disturb land that contains wetlands.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None would have an impact on water resources and floodplains. The incremental impact of Alternative 3 when added to other past, present, and reasonably foreseeable future actions would be short-term and minor due to construction actions within the alternative. Short-term minor adverse impacts within Alternative 3 would contribute slightly to a cumulative minor adverse impact.

Conclusion

There would be short-term minor adverse impacts to water resources with the implementation of Alternative 3. Contributing to the minor adverse impacts would be the construction of the expanded circulation system and new facilities within the park.

Vegetation

ALTERNATIVE 1 (NO ACTION)

Impacts

The park is landscaped with cultivated lawn grasses and ornamental shrubs and trees and is maintained regularly. Due to poor drainage on the site, standing water has caused the propagation of noxious weeds and undesirable broad-leaved grasses. Current mowing and vegetation management and maintenance regimes within this alternative, including turf management would remain in place. These regimes are not guided by a comprehensive landscape maintenance program

for the park. The No Action Alternative would not modify the existing conditions at the park. Therefore, the implementation of this alternative would result in long-term minor adverse impacts to vegetation.

Within the No Action alternative, current vegetation management not associated with a comprehensive management and maintenance program would have a direct and long-term moderate adverse impact on vegetation.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park, some of which would have short-term minor adverse impacts on vegetation. The incremental impact of the no action alternative when added to other past, present, and reasonably foreseeable future actions would result in long-term adverse impacts due to lack of implemented vegetation management strategies.

Conclusion

Implementation of the No Action Alternative would have long-term minor adverse impact on vegetation due to the lack of vegetation management strategies associated with specific vegetation and turf species and the introduction of invasive species.

ALTERNATIVE 2 (PROPOSED ACTION)

Impacts

Specific actions resulting from the implementation of Alternative 2 and associated potential impacts on vegetation would include: major addition of trees on the east and west of the historic core; introduction of trees within the Peace garden and in the vicinity of the visitor center; introduction of low ground cover or shrubs to protect the berm around the lower plaza from erosion; and, trees placed strategically along the curvilinear pedestrian walkway system. The area of the Peace Garden is currently all turf with two trees. These trees would be removed in this alternative. The Austrian pines would be removed in this alternative due to the plaza reconstruction project

that will occur in the near future. Existing trees in the island of the entrance loop drive west of the visitor center would be removed to give greater visibility to the front door of the visitor center. The island would retain the beds of colorful annuals and perennials. The majority of existing trees on the site would be retained and integrated into the proposed new plantings in this alternative. Other proposed actions would include construction of an expanded pedestrian circulation system and new park building facilities.

Alternative 2 would have a long-term positive impact on vegetation due to recommendations in the CLTP and introduction of new vegetation that would enhance the visitor experience and the overall historic character of the park. There would be short-term minor impacts to the turf and a limited amount of trees due to project construction and demolition of some of the existing walkway system. Mitigation measures for vegetation and turf protection would be implemented to avoid long-term impacts that extend beyond the duration of the project. (*See Mitigation Measures in Appendix A of this document.*)

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have short-term adverse impacts on vegetation. The incremental impact of Alternative 2 when added to other past, present, and reasonably foreseeable future actions would be long term and positive due to implementation of a vegetation management and maintenance program and strategies for removal and replacement of trees within the park.

Conclusion

There would be long-term positive impacts on vegetation within this alternative. Mitigation measures would be required to ensure the short-term adverse impacts would not become long-term adverse impacts. These actions would have a long-term and positive impact on vegetation.

ALTERNATIVE 3: (PROPOSED ACTION AND NPS-PREFERRED)

Impacts

Specific actions resulting from the implementation of Alternative 3 and associated potential impacts on vegetation would include: major addition of trees on the east and west of the historic core; introduction of trees within the Peace garden and in the vicinity of the visitor center; introduction of low ground cover or shrubs to protect the berm around the Memorial plazas; introduction of trees flanking the Memorial to replace the Austrian pines; and trees placed strategically along the rectangular pedestrian walkway system. The area of the Peace Garden is currently planted with turf and two trees. These trees would be removed in this alternative. The Austrian pines would be removed in this alternative due to the plaza reconstruction project in the near future. Existing trees in the entrance loop drive west of the visitor center would be removed for greater visibility to the front door of the visitor center. The island would retain a variety of colorful annuals, perennials, and grasses. The majority of existing trees would remain within the park. Proposed new trees would be integrated into the existing tree patterns. Other proposed actions would include construction of an expanded pedestrian circulation system and new park building facilities.

Alternative 3 would have a long-term positive impact on vegetation due to the introduction of new vegetation that would enhance the visitor experience and the overall historic character of the park. There would be short-term minor impacts to the turf and a limited amount of trees due to project construction and demolition of some of the existing walkway system. Mitigation measures for vegetation and turf protection would be implemented to avoid long-term impacts that extend beyond the duration of the project. (*See Mitigation Measures in Appendix A of this document.*)

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have short-

term adverse impacts on vegetation. The incremental impact of Alternative 3 when added to other past, present, and reasonably foreseeable future actions would be long term and positive due to implementation of a vegetation management and maintenance program and strategies for removal and replacement of trees within the park.

Conclusion

There would be long-term positive impacts on vegetation within Alternative 3. Mitigation measures would be required to ensure the short-term adverse impacts would not become long-term adverse impacts. These actions would have a long-term and positive impact on vegetation.

Wildlife

ALTERNATIVE 1 (NO ACTION)

Impacts

Continued management and maintenance policies associated with the No Action Alternative would not modify the existing conditions at the park of bird, mammal, reptile and aquatic populations or their habitat. Current habitat vegetation would many species of birds, as do many of the Lake Erie Islands, including Kelley's Island, Middle Bass Island, North Bass Island and Gibraltar Island. Implementation of Alternative 1 would result in negligible adverse impacts to wildlife.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have short-term minor impacts on wildlife. The incremental impact of the no action alternative when added to other past, present, and reasonably foreseeable future actions would be negligible.

Conclusion

The No Action Alternative would not modify wildlife or critical habitat at Perry's Victory and International Peace Memorial. No direct or adverse impacts to this resource would be expected.

ALTERNATIVE 2 (PROPOSED ACTION)

Impacts

Specific actions resulting from the implementation of this alternative and associated with potential impacts on wildlife and wildlife habitat would include: introduction of ground cover or low shrubs on the berm surrounding the lower plaza; and proposed tree plantings east and west of the historic core of the park. These two actions would afford expanded habitat for a diversity of wildlife species including birds, butterflies, moths and snakes. Within the development of the Peace Garden there would be opportunity to introduce specific plant materials that attract butterflies and provide habitat. These actions would have a positive impact on wildlife extending far into the future of the park.

Specific actions resulting from the implementation of Alternative 2 would have a negligible, short term adverse impact on wildlife due to localized impacts from additional proposed projects in distinct areas of the park, short duration of project construction, and prioritized phasing of projects.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have negligible impacts on wildlife. The incremental impact of Alternative 2, when added to other past, present, and reasonably foreseeable future actions would be long-term and positive.

Conclusion

There would be no long-term adverse impacts on wildlife and wildlife habitat from implementation of this alternative. Most impacts would be localized and positive and associated with specific vegetation proposed for the park.

ALTERNATIVE 3: (PROPOSED ACTION AND NPS-PREFERRED)

Impacts

Specific actions resulting from the implementation of this alternative and associated with potential impacts on wildlife and wildlife habitat would

include: introduction of ground cover or low shrubs on the berm surrounding the lower plaza; and proposed tree plantings east and west of the historic core. These two actions would afford expanded habitat for a diversity of wildlife species including birds, butterflies, moths and snakes. Development of the Peace Garden would present an opportunity to introduce plant materials that attract butterflies and provide habitat. These actions would have a positive impact on wildlife extending far into the future of the park.

Specific actions resulting from the implementation of Alternative 3 would have a negligible, short term impact on wildlife due to localized impacts from additional proposed projects in distinct areas of the park, short duration of project construction, and prioritized phasing of projects.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Most would have negligible impacts on wildlife. The incremental impact of Alternative 3, when added to other past, present, and reasonably foreseeable future actions would be long-term and positive.

Conclusion

There would be no long-term adverse impacts on wildlife and wildlife habitat from implementation of this alternative. Most impacts would be localized and positive and associated with specific vegetation proposed for the park.

Threatened and Endangered Species

ALTERNATIVE 1 (NO ACTION)

Impacts

During consultation with U.S. Fish and Wildlife Service (USFWS) the following comments were given to the park pursuant to the Fish and Wildlife Coordination Act (16 U.S.C.661 et seq.), National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347), and the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1544).

“The Lake Erie islands provide important migration and stopover habitat for monarchs as

they fly between the U.S., Mexico and Canada – a journey of over 3,000 miles. This journey has become more perilous for many monarchs because of threats along their migratory paths and on their breeding and wintering grounds. Monarch population have declined significantly in recent years. Threats include habitat loss – particularly the loss of milkweed, the monarch caterpillar's sole food source – and mortality resulting from pesticide use. The park is within the range of the monarch butterfly. USFWS has determined that listing under ESA may be warranted. The state of Ohio lies within range of the Federally endangered Indiana bat (*Myotis sodalist*) and the federally threatened northern long-eared bat (*Myotis septentrionalis*). The park also lies in the range of the Lake Erie watersnake (*Nerodia sipedon insularum*) and the kirtland warbler (*Septophaga kirtlandii*)."

There would be no disturbance within the No Action Alternative to these species or their supporting habitat. Rare and endangered plant species occur within wetlands and mudflats in the shoreline areas of the Lake Erie islands. No threatened or rare plant species are found within the boundary of the park. Therefore, in the No Action Alternative there are no adverse impacts to rare, endangered and threatened species within the park.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. The restoration of the seawalls would occur in the next five years. This project would have the potential to disturb shoreline edges and thus habitat for the watersnake. Therefore, there would be short term (duration of the project for a year or 18 months) minor adverse impact on the species. The viability of the population would not be affected. The incremental impact of the no action alternative when added to this future action would be a negligible.

Conclusion

Within the No Action Alternative, there would be no disturbance to vegetation habitats for identified

species of concern and therefore no adverse impact to this resource. During the implementation of the seawall restoration, habitat for the watersnake could be disturbed, but the No Action Alternative does not add an adverse incremental impact to the negligible effect of the seawall project.

ALTERNATIVE 2 (PROPOSED ACTION)

Impacts

Specific actions resulting from construction of circulation and facilities in Alternative 2 would have a short-term (time of the construction implementation) minor adverse impact on rare, threatened and endangered species. The viability of biotic populations of concern would not be impacted and the community if left alone would recover. Also, Alternative 2 would result in long-term (life of the proposed vegetation) positive impact on rare, threatened and endangered species due to tree plantings over the entire park and a variety of other plant species within the Peace garden. Plantings would include milkweed to support and attract the Monarch butterflies by addition of critical habitat. Coordination with the USFWS during construction and monitoring of the site for the Lake Erie watersnake would be required and implemented for each proposed project in this alternative. (*See Mitigation Measures in Appendix A of this document.*)

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None would have an impact on rare, threatened, or endangered species. The incremental impact of Alternative 2 when added to other past, present, and reasonably foreseeable future actions would be long term and positive due to vegetation management and addition of critical wildlife habitat.

Conclusion

The proposed vegetation management and maintenance and supporting vegetation habitat would have a long-term and positive impact on rare, threatened and endangered species. Coordination, monitoring, and mitigation

measures would be implemented to ensure no adverse impacts to rare, threatened and endangered species.

ALTERNATIVE 3: (PROPOSED ACTION AND NPS-PREFERRED)

Impacts

Specific actions resulting from construction of circulation and facilities in Alternative 3 would have a short-term (time of the construction implementation) minor adverse impact on rare, threatened and endangered species. The viability of biotic populations of concern would not be impacted and the community if left alone would recover. Also, Alternative 3 would result in long-term (life of the proposed vegetation) positive impact on rare, threatened and endangered species due to tree plantings over the entire park and a variety of other plant species within the Peace Garden. Plantings would include milkweed to support and attract the Monarch butterflies by addition of critical habitat. Coordination with the USFWS during construction and monitoring of the site for the Lake Erie watersnake would be required for each proposed project in this alternative. *(See Mitigation Measures in Appendix A of this document.)*

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None would have an impact on rare, threatened, or endangered species. The incremental impact of Alternative 3 when added to other past, present, and reasonably foreseeable future actions would be long term and positive due to vegetation management and addition of critical habitat.

Conclusion

The proposed vegetation management and maintenance and supporting vegetation habitat would have a long-term and positive impact on rare, threatened and endangered species. Coordination, monitoring, and mitigation measures would be implemented to ensure no adverse impacts to rare, threatened and endangered species.

Cultural Resources

Historic Buildings and Structures

ALTERNATIVE 1 (NO ACTION)

Impacts

Current management regimes within the No Action Alternative would continue and include repair and maintenance to historic buildings and structures at Perry's Victory and International Peace Memorial. This would include maintenance and management of the Memorial column, plazas, steps, walls and associated granite benches and urns. There would be continued cyclical repair work on the lower plaza in order to repoint selected paving joints. Similar management and maintenance would continue for the Men's Dormitory building and the Rangers Operations Center. The Rangers Operation Center is a non-contributing feature of the historic site but would be managed as a cultural resource. A project is currently underway to repair/repoint the column and an upcoming project would rehabilitate the upper plaza of the Memorial. Within this alternative, there would continue to be no ABAAS compliant access to the Memorial plazas or the column. The park would continue to adhere to the policy of not providing ABAAS standards for the column and observation platform. Within this alternative, there would be limited programmatic accessibility at the visitor center or elsewhere within the park to give all visitors a commensurate experience of the views that are essential to interpretation from the observation platform of the column. The No Action Alternative would have no adverse impact on the physical structure of historic buildings and structures within the park. *(See visitor use and experience for further analysis associated with current ABAAS accessibility for historic features of the park.)*

Section 106 Summary

NHPA section 106 regulations apply only to properties that meet the eligibility requirements of the National Register. Therefore, assessment of NHPA section 106 effects applies only to those historic structures/cultural landscape features that are listed on the National Register or those that meet National Register criteria for listing. The

application of the Advisory Council criteria of adverse effects (36 CFR 800.5 “Assessment of Adverse Effects”) has been completed.

For purposes of Section 106 compliance there would be **no adverse effect** on Historic Buildings and Structures.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have a positive impact to historic buildings and structures. The incremental impact of the No Action Alternative when added to other past, present, and reasonably foreseeable future actions would be long-term and positive.

Conclusion

Current management and maintenance of historic buildings and structures, park goals of preservation of the historic character of the Memorial and grounds and lack of ABAAS accessibility standards for the plazas and column would result in no modifications to existing historic buildings and structures. Therefore, implementation of the No Action Alternative would result in no adverse impacts to these resources.

ALTERNATIVE 2 (PROPOSED ACTION)

Impacts

In the development of the action alternatives, a priority was defined and articulated by park staff. This priority was the desire to make park entrances, circulation and major features compliant with ABAAS standards for accessibility, so all visitors would be able to access the park, and its facilities and programs. The park staff also has strong feelings about accommodating visitors at the Memorial through implementation of ABAAS standards for access to the lower plaza and access from the lower plaza to the upper plaza. The staff were not in favor of options that brought visitors around the side or rear of the upper plaza, but rather felt that any accessibility changes would allow visitors to experience the grandeur of the Beaux Arts design. In response, the design team

located a ramp system on either side of the grass berm that would provide access to the lower plaza and a ramp system in the center of the monumental steps leading from the lower to the upper plaza. This approach would preserve the greatest amount of the existing stair system as well as the symmetry of the original design. At each end of the stairs, the existing relationship between the plinths and the urns would be maintained. The slope of the ramps is shallow enough that railings would not be required. While not required, the design team provided a granite perimeter seat that would create a safety barrier. Heights of landings and adjacent steps or ramps would not require guardrails.

Alternative 2 would be sensitive to the original design intent for the paving materials on both plazas. Recommendations would enhance the sustainability of the plaza paving and materials would be of the highest quality and condition and the historic paving pattern would be retained. The visitors eye would move quickly away from the familiar historic surface pattern to the contrasting simplicity of the Doric column above, and then onto the views and vistas of the historic core from the plaza.

Alterations to the steps to provide accessibility, would occur within this alternative and due to the goals for accessibility, there would be minor and short-term impacts to the Memorial steps. Alteration of the steps for accessibility would slightly diminish the overall integrity of the upper and lower plazas. This action would not jeopardize the historical integrity of the Memorial structure and grounds to the extent that it would lose its current listing in the National Register. *(See Mitigation Measures in Appendix A of this document.)*

Section 106 Summary

NHPA section 106 regulations apply only to properties that meet the eligibility requirements of the National Register. Therefore, the assessment of NHPA section 106 effects applies only to those historic structures/cultural landscape features that are listed on the National Register or those that meet National Register criteria for listing. The

application of the Advisory Council criteria of adverse effects (36 CFR 800.5 “Assessment of Adverse Effects”) has been completed.

For purposes of Section 106 compliance there would **no adverse effect** on Historic Buildings and Structures due to proposed actions in Alternative 2. Since the stair/accessibility project is not currently scheduled for implementation, the NPS would continue to consult with the Ohio SHPO Office and concurring parties to ensure that the undertaking will, through compatible design, meet the Secretary of Interior’s Standards for Rehabilitation.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have a positive impact to historic buildings and structures. The incremental impact of Alternative 2 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive.

Conclusion

Within Alternative 2, all maintenance and management of historic building and structures would continue including projects for repair and restoration of the column and the plazas. These projects plus the paving recommendation (upper plaza will be paved with granite and brick, based on the original design and pattern of the Freedlander plans) within this alternative would have a long-term positive impact on the Memorial structure. Ramp access to the lower plaza would have a minor impact on the resource and for purposes of Section 106, **no adverse effect**. Implementation of ABAAS standards for accessibility from the lower plaza to the upper plaza would slightly diminish the integrity of the grand steps but would not jeopardize the historical integrity of the Memorial structure and grounds to the extent that would lose its current listing in the National Register. For purposes of Section 106, there would be **no adverse effect**.

ALTERNATIVE 3: (PROPOSED ACTION AND NPS-PREFERRED)

Impacts

In the development of the action alternatives, a priority was defined and articulated by park staff. This priority was the desire to make park entrances, circulation and major features compliant with ABAAS standards for accessibility so visitors would be able to access the park, and its facilities. The park staff also had strong feelings about accommodating visitors at the Memorial through implementation of ABAAS standards for accessibility to the lower plaza and from the lower plaza to the upper plaza. The staff were not in favor of options that brought visitors around the side or rear of the upper plaza, but rather felt that any accessibility changes would allow visitors to experience the grandeur of the Beaux Arts design. In response, the design team located a ramp system on either side of the grass berm that would provide access to the lower plaza and a ramp system in the center of the monumental steps leading from the lower to the upper plaza. This approach would preserve the greatest amount of the existing stair system as well as the symmetry of the original design. At each end of the stairs, the existing relationship between the plinths and the urns would be maintained. The slope of the ramps is shallow enough that railings would not be required. While not required, the design team provided a granite perimeter seat that would create a safety barrier. Heights of landings and adjacent steps or ramps would not require guardrails.

Alternative 3 would be sensitive to the original design intent for the paving materials on both plazas. Recommendations would enhance the sustainability of the plaza paving and materials would be of the highest quality and condition and the historic paving pattern would be retained. The visitor’s eye would move quickly away from the familiar historic surface pattern to the contrasting simplicity of the Doric column above, and then onto the views and vistas of the historic core from the plaza.

Alterations to the steps to provide accessibility, would occur within Alternative 3 and due to the

goals for accessibility, there would be minor and short-term impact to the Memorial steps. Alteration of the steps for accessibility would slightly diminish the overall integrity of the upper and lower plazas. This action would not jeopardize the historical integrity of the Memorial structure and grounds to the extent that it would lose its current listing in the National Register. (*See Mitigation Measures in Appendix A of this document.*)

Section 106 Summary

NHPA section 106 regulations apply only to properties that meet the eligibility requirements of the National Register. Therefore, the assessment of NHPA section 106 effects applies only to those historic structures/cultural landscape features that are listed on the National Register or those that meet National Register criteria for listing. The application of the Advisory Council criteria of adverse effects (36 CFR 800.5 “Assessment of Adverse Effects”) has been completed.

For purposes of Section 106 compliance there would be **no adverse effect** on Historic Buildings and Structures due to proposed actions in Alternative 3. Since the stair/accessibility project is not currently scheduled for implementation, the NPS would continue to consult with the Ohio SHPO Office and concurring parties to ensure that the undertaking will, through compatible design, meet the Secretary of Interior’s Standards for Rehabilitation.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have a positive impact to historic buildings and structures. The incremental impact of Alternative 3 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive.

Conclusion

Within Alternative 3, all maintenance and management of historic building and structures would continue as well as projects for repair and

restoration of the column and the plazas. These projects plus the paving recommendation (upper plaza will be paved with granite and brick, based on the original design and pattern of the Freedlander plans) within this alternative would have a long-term positive impact on the Memorial structure. Ramp access to the lower plaza would have a minor impact on the resource and for purposes of Section 106, no adverse effect. Changes to the steps to meet ABAAS standards for accessibility from the lower plaza to the upper plaza, would slightly diminish the integrity of the feature, but would not jeopardize the historical integrity of the Memorial structure and grounds to the extent that it would lose its current listing in the National Register. For purposes of Section 106, there would be **no adverse effect**.

Cultural Landscape

ALTERNATIVE 1 (NO ACTION)

Impacts

Current management and maintenance within the No Action Alternative focus on preservation of the designed historic landscape of Perry’s Victory and International Peace Memorial. The landscape around the Memorial was carefully considered to provide an appropriate setting for the monument itself. As noted in the National Register Nomination Additional Documentation for the Memorial, Freedlander and Seymour considered views both to and from the monument, utilizing Beaux Arts planning features such as axial avenues and planned vistas. As noted in the National Register Additional Documentation:

The openness of the site, achieved through the establishment of lawn areas on the east and west sides of the plazas that reflect the open expanses of water on the north and south sides, provides the symmetrical balance that is one of the hallmarks of Beaux Arts Classicism. . . .

The most prominent vegetative feature of the site, however, is the flat, grassed lawn, a mixture of grasses, clove, and weeds. . . . The architects specified a mixture of several types of grasses and white clover in the earliest landscape design, but it is unknown whether that was ultimately the mix planted or if any of the original grasses remain. Nevertheless, the

wide, flat, horizontal expanse of grass as a visual counter to the verticality of the Memorial column was integral to the original design concept. . . In addition, the planter beds located on the upper plaza were specified as beds of grass, called grass panels in the original design. As grass panels, they would carry the overall effect of the horizontal plane of the lawn onto the plaza. Although planted in barberry hedging between 1925 and 1933, they have been planted in grass, per the original design, since the removal of the barberry hedges beginning in the mid-1930s.²⁴

In 1924, Freedlander redesigned some of the landscape plantings in response to a shortfall in funding for the designed landscape. The revised design includes plantings of trees and shrubs along the east and west boundaries of the original site, framing the plazas and lawns.²⁵

Exploration of ways to utilize the cultural landscape as a tool for interpreting the historical context of the battle and the updated understanding of some battle events and troop movements would not be part of continuing management within this alternative. Visitors would continue to gain most of their knowledge of the Battle of Lake Erie through the exhibits located within the visitor center and on the observation platform of the Memorial column, which does not meet ABAAS standards for accessibility. This alternative would limit the park in its ability to explain the historical context of the battle through visual association and interpretation of the cultural landscape. The park would manage and maintain the open turf landscape, the grass panels on the upper plaza, and existing tree plantings on the east and west boundaries of the historic core. There would be no direct adverse impact to the cultural landscape within this alternative, but there would be limitations to its use in expanded interpretation.

Section 106 Summary

NHPA section 106 regulations apply only to properties that meet the eligibility requirements of the National Register. Therefore, the assessment of NHPA section 106 effects applies only to those historic structures/cultural landscape features that are listed on the National Register or those that meet National Register criteria for listing. The application of the Advisory Council criteria of adverse effects (36 CFR 800.5 “Assessment of Adverse Effects”) has been completed.

For purposes of Section 106 compliance there would be **no adverse effect** on the cultural landscape.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have a positive impact to the cultural landscape. The incremental impact of the No Action Alternative when added to other past, present, and reasonably foreseeable future actions would be negligible.

Conclusion

Current management and maintenance of the cultural landscape and park goals of preservation of historical character of the historic designed landscape would result in no modifications to the existing cultural landscape. Therefore, implementation of the No Action Alternative would result in no changes to the overall integrity or character-defining features of the cultural landscape as they currently exist. Therefore, there would be **no adverse impacts and no adverse effects** to the cultural landscape.

24 Ibid, 7-10, 7-11.

25 Deborah E. Harvey, MHP, Outside the Box, LLC, Richmond, Virginia, *National Register Nomination for Perry's Victory and International Peace Memorial (Additional Documentation)*, September 8, 2014, 7-11, 7-12.

ALTERNATIVE 2 (PROPOSED ACTION)

Impacts

Alternative 2 would retain and enhance the landscape elements and features that are contributing resources to the landscape. Also, the historically important views of the cultural landscape would be maintained and enhanced. In addition, the flagpoles would be retained and the grading of topography would continue the symmetry around the Memorial while retaining the open space setting of the historic designed landscape. Alternative 2 would add expanded walkways within the historic core of the park. The curvilinear alignments are graceful and sensitive to the simplicity of the Memorial grounds. This proposed change to the landscape would preserve the openness and restore some of the original design intent to the grounds. Alternative 2 would situate the Memorial firmly in its landscape, drawing together the Doric column, the berm and the open lawn areas into to total composition. Overall, Alternative 2 would respect and enhance the landscape and setting of the Memorial and grounds and afford visitors opportunities for expanded interpretation through integration with the cultural landscape. There would be a long-term positive impact on the cultural landscape. *(See Mitigation Measures in Appendix A of this document.)*

Section 106 Summary

NHPA section 106 regulations apply only to properties that meet the eligibility requirements of the National Register. Therefore, the assessment of NHPA section 106 effects applies only to those historic structures/cultural landscape features that are listed on the National Register or those that meet National Register criteria for listing. The application of the Advisory Council criteria of adverse effects (36 CFR 800.5 “Assessment of Adverse Effects”) has been completed.

For purposes of Section 106 compliance there would be **no adverse effect** on cultural landscapes.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have a positive impact to the cultural landscape. The incremental impact of Alternative 2 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive.

Conclusion

With implementation of the proposed actions in Alternative 2 and maintenance of the integrity of the cultural landscape while integrating it with the overall visitor experience, there would be a long-term and positive impact on the cultural landscape of Perry’s Victory and International Peace Memorial.

ALTERNATIVE 3: (PROPOSED ACTION AND NPS-PREFERRED)

Impacts

Alternative 3 would retain and enhance the landscape elements and features that are contributing resources to the landscape. Also, the historically important views of the cultural landscape would be maintained and enhanced. In addition, the flagpoles would be retained and grading of topography would retain the symmetry around the Memorial while preserving the open space setting of the historic designed landscape. Alternative 3 would retain many of the existing walkways and also add walkways within the historic core of the park. The additional walkways that parallel the Memorial would provide additional access to the south boundary of the park and views and access to the south façade of the Memorial. The walkway alignments would be rectilinear and retain more of the existing walkways within the historic core. The circulation design would retain the open symmetrical lawn areas to the east and west of the Memorial. This alternative would incorporate additional tree plantings located east and west of the historic core that help re-establish enclosure of the historic core space. Alternative 3 would slightly alter the landscape, but the actions would preserve the openness and restore some of the original design intent to the grounds. Alternative 3 would situate

the Memorial firmly in its landscape, drawing together the Doric column, the berm and the open lawn areas into a total composition. Overall, Alternative 3 would respect and enhance the landscape and setting of the Memorial and grounds and afford visitors opportunities for expanded interpretation through integration with the cultural landscape. *(See Mitigation Measures in Appendix A of this document.)*

Section 106 Summary

NHPA section 106 regulations apply only to properties that meet the eligibility requirements of the National Register. Therefore, the assessment of NHPA section 106 effects applies only to those historic structures/cultural landscape features that are listed on the National Register or those that meet National Register criteria for listing. The application of the Advisory Council criteria of adverse effects (36 CFR 800.5 “Assessment of Adverse Effects”) has been completed.

For purposes of Section 106 compliance there would be **no adverse effect** on cultural landscapes.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. Some would have a positive impact to the cultural landscape. The incremental impact of Alternative 3 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive.

Conclusion

With implementation of the proposed actions in Alternative 3 and maintenance of the integrity of the cultural landscape, there would be a long-term and positive impact on the cultural landscape of Perry’s Victory and International Peace Memorial.

Historic Viewsheds

ALTERNATIVE 1 (NO ACTION)

Impacts

The historic viewsheds associated with the Memorial and grounds would be maintained in their current conditions within this alternative.

Powerlines would remain in the viewshed along Bayview Avenue from Hartford to Toledo Avenues and create visual clutter in the major viewshed to the Memorial and the park identification sign. A variety of traffic signs and signals would continue to contribute to the clutter in this viewshed to the Memorial. The viewshed from the park entrance at Delaware and Toledo Avenues would need consistent vegetation management and maintenance in order to retain the viewshed to the Memorial. The viewshed from the historic designed landscape to the Memorial column would be maintained and managed. Historic viewsheds from the water toward the Memorial would remain relatively uncluttered but the park does not have jurisdiction over dock construction in Put-in-Bay and that development would continue to disrupt the viewshed from Lake Erie to the Memorial. The viewshed from the observation platform of the Memorial column to the site of the Battle of Lake Erie, would survive with no visual interference. Implementation of this alternative would result in long-term minor adverse impacts to historic viewsheds.

Section 106 Summary

NHPA section 106 regulations apply only to properties that meet the eligibility requirements of the National Register. Therefore, the assessment of NHPA section 106 effects applies only to those historic structures/cultural landscape features and historic viewsheds that are listed on the National Register or those that meet National Register criteria for listing. The application of the Advisory Council criteria of adverse effects (36 CFR 800.5 “Assessment of Adverse Effects”) has been completed.

For purposes of Section 106 compliance there would be **no adverse effect** on Historic Viewsheds.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None would have an impact on historic viewsheds. The incremental impact of the no action alternative when added to

other past, present, and reasonably foreseeable future actions would be negligible.

Conclusion

Historic viewsheds associated with the Memorial column and grounds are managed and maintained within this alternative. Current management and maintenance of the viewsheds and park goals for preservation of the historic character of the park would result in no modification to the existing historic viewsheds. Therefore, implementation of the No Action Alternative would result in no adverse impact on historic viewsheds.

ALTERNATIVE 2 (PROPOSED ACTION)

Impacts

In the original design for the Memorial, Freedlander and Seymour considered views both to and from the monument, utilizing Beaux Arts planning features such as axial avenues and planned vistas. Specific actions resulting from the implementation of this alternative and associated with potential impacts on historic viewsheds would include: underground powerlines along Bayview Avenue from Hartford to Toledo Avenues, additional tree plantings strategically located to enhance views to the Memorial; and maintenance of open space around the Memorial and plazas. These actions would have a long-term positive impact on historic viewsheds within the park and from the park.

Construction activities associated with expansion of circulation and addition of small buildings would have a short-term minor adverse impact on historic viewsheds when large equipment and associated construction fences or storage obstructs the viewsheds. These impacts would be short-term (the duration of the project) and the viewshed re-established once construction was complete.

Overall there would be a long-term positive impact on historic viewsheds with the implementation of Alternative 2.

Section 106 Summary

NHPA section 106 regulations apply only to properties that meet the eligibility requirements of the National Register. Therefore, the assessment of NHPA section 106 effects applies only to those cultural landscape features including historic viewsheds that are listed on the National Register or those that meet National Register criteria for listing. The application of the Advisory Council criteria of adverse effects (36 CFR 800.5 “Assessment of Adverse Effects”) has been completed. For purposes of Section 106 compliance there would be **no adverse effect** on Historic Viewsheds.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None of which would have an impact on historic viewsheds. The incremental impact of the Alternative 2 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive due to the re-establishment of critical viewsheds and subsequent management and maintenance.

Conclusion

Under Alternative 2, viewsheds associated with the Memorial and landscape conditions would be re-established, maintained and managed and offer park visitors an understanding of the historic landscape, the Memorial column and plazas, and the Battle of Lake Erie from the observation platform at the top of the Memorial column. Overall, the impact of Alternative 2 on historic viewsheds would be long-term and positive.

ALTERNATIVE 3: (PROPOSED ACTION AND NPS-PREFERRED)

Impacts

In the original design for the Memorial, Freedlander and Seymour considered views to and from the monument, utilizing Beaux Arts planning features such as axial avenues and planned vistas. Specific actions resulting from the implementation of this alternative and associated with potential

impacts on historic viewsheds would include: underground powerlines along Bayview Avenue from Hartford to Toledo Avenues; additional tree plantings strategically located to enhance views to the Memorial; and maintenance of open space around the Memorial and plazas. These actions would have a long-term positive impact on historic viewsheds within the park and from the park.

Construction activities associated with expansion of circulation and addition of small buildings may have a short-term minor adverse impact on historic viewsheds when large equipment and associated construction fences or storage obstructs the viewsheds, especially internal park views to and from the Memorial. These impacts would be short-term (the duration of the project) and the viewshed re-established once construction is complete.

Overall there would be a long-term positive impact on historic viewsheds with the implementation of Alternative 3.

Section 106 Summary

NHPA section 106 regulations apply only to properties that meet the eligibility requirements of the National Register. Therefore, the assessment of NHPA section 106 effects applies only to those cultural landscape features including historic viewsheds that are listed on the National Register or those that meet National Register criteria for listing. The application of the Advisory Council criteria of adverse effects (36 CFR 800.5 “Assessment of Adverse Effects”) has been completed. For purposes of Section 106 compliance there would be **no adverse effect** on Historic Viewsheds.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park. None would have an impact on historic viewsheds. The incremental impact of the Alternative 3 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive due to the re-establishment of critical viewsheds and subsequent management and maintenance.

Conclusion

Under Alternative 3, viewsheds associated with the Memorial and landscape conditions would be re-established, maintained and managed and offer park visitors an understanding of the historic landscape, the Memorial column and plazas, and the Battle of Lake Erie from the observation platform at the top of the Memorial column. Overall, the impact of Alternative 3 on historic viewsheds would be long-term and positive.

Visitor Use and Experience

ALTERNATIVE 1 (NO ACTION)

Impacts

Within the No Action Alternative, there would be no additions to visitor facilities and the initial visitor experience would begin at the visitor center. There would be no distinct entrance or transition from the village and surrounding community to the park. Programs and interpretation guided by the *Long-Range Interpretive Plan* would continue. Visitors would continue to access the park at the intersection of Delaware and Toledo Avenues and at the intersection of Bayview and Toledo Avenues. The park would continue to manage and maintain the pedestrian circulation system in its current alignment throughout the park. Within this alternative would be no new visitor amenities and no expansion of interpretation using the cultural landscape as a tool for interpreting the significance of the site. The No Action Alternative would continue to have moderate adverse impacts on the visitor experience due to lack of ABAAS compliant access to the visitor center east porch and entrance as well as lack of accessibility to the Memorial plazas for all visitors to the park. There would continue to be no clear access and orientation afforded as visitors approach the park from the village and surrounding roadways. Therefore, the No Action Alternative would have long-term moderate adverse impact on the visitor experience. Visitor frustration has been expressed to park staff concerning the visitor experience and lack of accessibility.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park, which would have short-term positive impacts to the visitor experience. These projects would be for the most part associated with maintenance and management. The incremental impact of the No Action Alternative when added to other past, present, and reasonably foreseeable future actions would be long-term and adverse as the overall visitor experience would remain the same, with limited interpretation and full accessibility for all park visitors.

Conclusion

This alternative would have long-term moderate adverse impacts on the visitor experience due to the limitations of existing interpretation and integrated with the cultural landscape. Even more significant is the lack of universal accessibility including programmatic accessibility to all park visitors.

ALTERNATIVE 2 (PROPOSED ACTION)

Impacts

Specific actions resulting from the implementation of this alternative and associated with potential impacts on visitor use and experience would include: expanded pedestrian circulation system with curvilinear walkways; creation of spaces in the landscape for passive recreation and contemplation; expanded circulation system that would meet ABAAS standards for accessibility throughout the park landscape, the Memorial plazas, the visitor center and all proposed park buildings; addition of distinct and formal entrances to the park, including the new route through the Peace Garden from Hartford Avenue and the other entrances from Toledo Avenue; addition of contemplative nodes along the walkway to afford visitors shade, seating, wayside interpretation and viewsheds; and, addition of open-air pavilion structures east of the visitor center for group gatherings, special events associated with interpretation, shade, and protection from the elements. The visitor center would also offer programmatic accessibility for

disabled visitors. The proposed actions in Alternative 2 would have a long-term positive impact to visitor use and experience at Perry's Victory and International Peace Memorial. (*See Mitigation Measures in Appendix A of this document.*)

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park, which would have short-term positive impacts, associated with maintenance and management, to the visitor experience at Perry's Victory and International Peace Memorial. The incremental impact of Alternative 2 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive for visitor use and experience at the park.

Conclusion

The proposed walkways would be expanded and modified in accordance with the site grading and landscape. The system of curvilinear walkways and associated nodes would guide pedestrian movement across the visitor access /administration zone and the historic core zone of the park. In addition, walkways would improve accessibility throughout the park thereby creating a positive impact for access by all visitors to the park. The proposed actions in Alternative 2 would have a long-term positive impact to visitor use and experience at Perry's Victory and International Peace Memorial.

ALTERNATIVE 3: (PROPOSED ACTION AND NPS-PREFERRED)

Impacts

Specific actions resulting from the implementation of this alternative and associated with potential impacts on visitor use and experience would include: expanded pedestrian circulation system with walkways and major nodes; expanded circulation system that would meet ABAAS accessibility standards throughout the park landscape, the Memorial plazas, the visitor center and all proposed park buildings; addition of distinct and formal entrances to the park that

would include the new route through the Peace Garden from Hartford Avenue and the other entrances from Toledo Avenue; addition of three contemplative nodes, two at the south terminus of the diagonal walkways and one associated with the northwest corner of the park afford visitors shade, seating, wayside interpretation and viewsheds to the landscape; and, addition of open-air pavilion structures flanking the east façade of the visitor center for expanded park programs and special events. The visitor center would also offer programmatic accessibility for all park visitors. The proposed actions in Alternative 3 would have a long-term positive impact to visitor use and experience at Perry's Victory and International Peace Memorial. *(See Mitigation Measures in Appendix A of this document.)*

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park, which would have short-term positive impacts, associated with maintenance and management, to the visitor experience at Perry's Victory and International Peace Memorial. The incremental impact of Alternative 3 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive for visitor use and experience at the park.

Conclusion

The proposed walkways would be expanded and modified in accordance with the site grading and landscape. The system of walkways and associated nodes would guide pedestrian movement across the visitor access /administration zone and the historic core zone of the park. In addition, walkways would improve accessibility throughout the park thereby creating a positive impact on access for all park visitors. The proposed actions in Alternative 3 would have a long-term positive impact to visitor use and experience at Perry's Victory and International Peace Memorial.

Human Health and Safety

ALTERNATIVE 1 (NO ACTION)

Impacts

The No Action Alternative would represent a continuation of the existing conditions, operations, and maintenance of Perry's Victory and International Peace Memorial. Park staff would continue to implement plans and policies to promote safety for all visitors to the park. Park personnel would remain vigilant with visitor safety issues dealing with severe summer weather, heat and humidity, insects, storms, and flooding. Current and ongoing management and maintenance of buildings, structures, walkways, exhibits, site furnishings, and vegetation would continue. There would also be continued monitoring and maintenance of the park's signage that clarifies separation of vehicular and pedestrian circulation, and limited access to the Memorial upper plaza. Park staff would supervise visitation at the Memorial column and plazas in order to keep visitors from climbing the berm around the lower plaza. Park staff would also monitor golf cart use of pedestrian walkways. Pathway lighting would remain in the vicinity of the visitor center.

The black powder magazine would remain in a location that does not meet compliance standards for this type of facility. This would result in a potential safety hazard in the proximity of staff housing and the adjacent neighborhood east of the park.

There would be a long-term (a year or longer to implement a PMIS project or projects) localized adverse impact to this specific area within the park. The impact would be significant due to potential threats to the safety and well-being of park staff, visitors and neighbors. Therefore, there would be a long-term moderate adverse impact on human health and safety.

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park, which would have short-term positive impacts associated with

maintenance and management for human health and safety at Perry's Victory and International Peace Memorial. The incremental impact of the No Action Alternative when added to other past, present, and reasonably foreseeable future actions would add a long-term and adverse impact due to the continued issue of visitor safety associated with the location of the black powder magazine.

Conclusion

Within this alternative, there would be significant (immediate and unaddressed threats to human safety) adverse impacts on human health and safety.

ALTERNATIVE 2 (PROPOSED ACTION)

Impacts

Specific actions from the implementation of Alternative 2 associated with potential impacts on human health and safety would include: relocation of the black powder magazine south of staff housing and within the required 75' buffer; ABAAS accessibility to all park circulation and facilities; new and sustainable paving on the upper plaza; removal of parking from the north side of the Memorial and clear directional signage and circulation from village streets into and through the park. There would be consideration and planning for necessary lighting along pathways and use of solar energy in the implementation of any new lighting plans. These actions would have a long-term positive impact on human health and safety within the park. *(See Mitigation Measures in Appendix A of this document.)*

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park which would have short-term positive impacts on human health and safety. The incremental impact of Alternative 2 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive due to the implementation of the specified improvements.

Conclusion

Within this alternative, there would be long-term and positive impacts on human health and safety. The number and extent of the specified actions would ensure for many years into the future, the well-being of park staff, visitors and neighbors.

ALTERNATIVE 3: (PROPOSED ACTION AND NPS-PREFERRED)

Impacts

Specific actions from the implementation of Alternative 3 associated with potential impacts on human health and safety would include: relocation of the black powder magazine south of staff housing and within the required 75' buffer; ABAAS accessibility to all park circulation and facilities; new and sustainable paving on the upper plaza; removal of parking from the north side of the Memorial; and clear directional signage and circulation from village streets into and through the park. There would be consideration and planning for necessary lighting along pathways and use of solar energy in the implementation of new lighting plans. These actions would have a long-term positive impact on human health and safety within the park. *(See Mitigation Measures in Appendix A of this document.)*

Cumulative Impacts

There are a number of past, ongoing, and reasonably foreseeable projects occurring or proposed within the park which would have short-term positive impacts on human health and safety. The incremental impact of Alternative 3 when added to other past, present, and reasonably foreseeable future actions would be long-term and positive due to the implementation of the specified improvements.

Conclusion

Within Alternative 3, there would be long-term and positive impacts on human health and safety. The number and extent of the specified actions would ensure for many years into the future, the well-being of park staff, visitors and neighbors.

Consultation and Coordination

National Park Service (NPS) Director's Order 12 requires the NPS to make "diligent" efforts to involve the interested and affected public in the National Environmental Policy Act (NEPA) process. This chapter documents the scoping process for this Environmental Assessment (EA) as well as interagency consultation and coordination with the U. S. Fish and Wildlife Service (USFWS), Ohio State Historic Preservation Office (SHPO) and other natural and cultural resource agencies. Included in this chapter is the list of recipients who received notice of the project undertaking and the planned stakeholder meetings.

Scoping Process and Public Involvement

Start-Up Meeting: To officially initiate the CLTP/EA project, a kick-off planning and scoping meeting was held on October 4-7, 2016 to initiate work on the project, initiate a strategy for public involvement throughout the process, and introduce the project to residents of South Bass Island, park staff, and interested stakeholders. This internal scoping meeting included the following participants:

- Bill Harlow, *Chief, Historic Architecture and Landscapes, NPS Midwest Regional Office*
- Marla McEnaney, *Historical Landscape Architect, NPS Midwest Regional Office*
- Barbara Fearon, *Superintendent, PEVI*
- Rodney Karr, *Maintenance Supervisor, PEVI*
- Jeff Helmer, *Park Ranger, PEVI*
- Rob Whitman, *Park Ranger, PEVI*
- Laura Knott, *Project Manager, (CHG)*
- Jane Jacobs, *Historical Landscape Architect, (CHG)*
- Deborah Slaton, *Landscape Historian (WJE)*

- Timothy Penich, *Historical Architect (WJE)*

The meeting focused on development of the Comparative Analysis and the Cultural Landscape Treatment Plan (CLTP) and associated Environmental Analysis (EA). Stakeholder groups were discussed in the meeting. All identified stakeholders received letters of invitation to the public open house on October 6th and all other subsequent public open houses scheduled for this project.

The public open house was held on October 6, 2016, in order to introduce the project to residents of South Bass Island, park staff, and interested stakeholders. The project was presented by the Superintendent and the planning team was introduced. Goals and objectives of the project were discussed and participants expressed various concerns, specifically about the effects on natural resources and wildlife and on the condition of the Village beach located south of the park and adjacent to the south seawall.

Internal Planning Workshop: An internal planning workshop with park staff and the planning team was held on May 16-17, 2017. Goals were to review progress on the CLTP/EA, develop alternative design concept plans, and formulate further specific goals and objectives for the project. A second public open house was held on May 17, 2017 after the workshop, to present conceptual alternatives and gain feedback for use in subsequent planning and design. (Figure 4-27) and (Figure 4-28).

Public Meeting: The public had an additional avenue of participation through a third public meeting on October 25, 2017. This meeting gave stakeholders and staff an opportunity to see developed concept design alternatives. Comments and suggestions were incorporated into the draft CLTP/EA based on public input.

The final draft of the CLTP/EA went to public review for 30 days, March 23-April 24, 2018 and was uploaded on the NPS Planning Environment, and Public Comment (PEPC) system website. Hard copies of the draft document were sent to appropriate agencies for review and letters were



Figure 4-27: Public meeting in May 2017 gave stakeholders a chance to give input based on presentation of conceptual alternatives. *CHG*

sent to stakeholders informing them of the review period and the methods available to them to respond to the document. Comments were collected from the PEPC site, emails, and submitted letters during the 30-day review period. Comments and questions were documented in the Public Review Analysis and taken into consideration as the CLTP/EA was finalized.

Consultation

Consultation with USFWS and the Ohio SHPO office was initiated in January of 2017. The National Park Service contacted Dan Everson, field Office Supervisor of the Ohio Field Office of U.S. Fish and Wildlife Service, Field Supervisor with the U. S. Fish and Wildlife Service (USFWS) through a letter dated January 13, 2017. The letter served as notification that the park had begun the NEPA process and was proposing to have an EA available for public and regulatory review later in the year. In addition, the letter served as a record that the NPS was initiating informal consultation with USFWS pursuant to

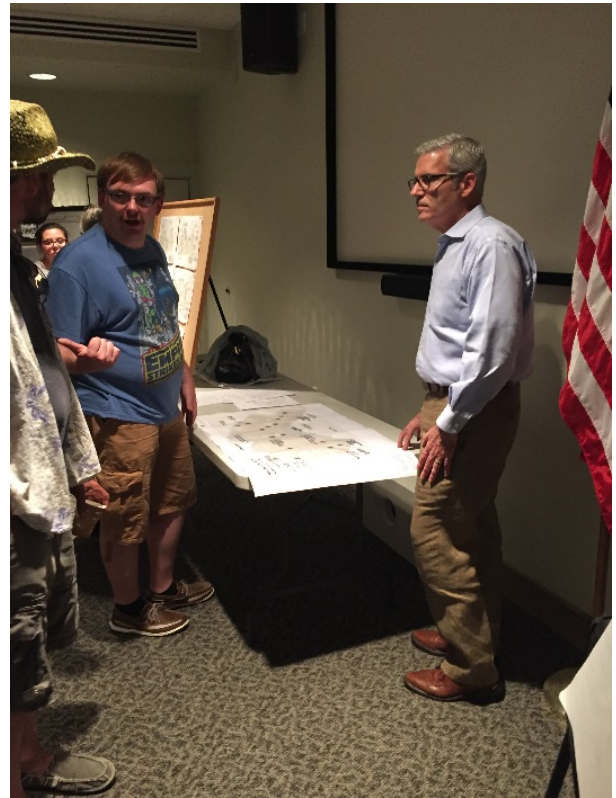


Figure 4-28: Conceptual ideas were presented to the public and issues discussed with individual team members. *CHG*

Section 7 of the Endangered Species Act of 1973, that requires that a federal agency consult with the USFWS or the National Marine Fisheries Service on any action that may affect endangered or threaten species or candidate species or that may result in adverse modification of critical habitat. The National Park Service received a letter with comments and recommendations that will assist the park in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, amended.

The National Historic Preservation Act (NHPA); National Environmental Protection Act (NEPA); NPS Organic Act; NPS Management Policies, 2006; Director's Order 12: Conservation Planning, Environmental Impact Analysis and Decision-making; and Director's Order 28: Cultural Resources Management Standard require the consideration of impacts on cultural resources, either listed in or eligible to be listed in, the National Register of Historic Places. The National Park Service notified Amanda Schraner Terrell, Deputy State Historic Preservation Officer for

Ohio, through a letter dated January 12, 2017. In accordance with Section 800.8(3)(c) of the Advisory Council on Historic Preservation's regulations, this letter informed the office of the SHPO of the park's intention to use the EA to meet its obligations under Section 106 of the NHPA. It also stated that the EA will contain an Assessment of Effect for all cultural resources potentially affected by the proposed alternatives. The draft CLTP/EA document was made available to the SHPO for review and comment.

Agency review letters were received from Ohio History Connection, Department of Resource Protection and Review and Ohio Department of Natural Resources, Division of Wildlife and Division of Water Resources. These letters of response and comments were included in the appendix of this document.

Preparers, Consultants and References

Preparers and Consultants

NPS: Perry's Victory and International Peace Monument

Barbara Fearon, *Superintendent*

Rodney Karr, *Maintenance Supervisor*

Jeff Helmer, *Park Ranger*

Rob Whitman, *Park Ranger*

NPS: Midwest Regional Office

Bill Harlow, *Chief, Historic Architecture and Landscapes*

Marla McEnaney, *Historical Landscape Architect*

Consultants

Commonwealth Heritage Group:

Laura Knott, *Project Manager*

Jane J. Jacobs, *Historical Landscape Architect*

Christina Osborn, *Historic Preservation Specialist*

Wiss, Janney, Elstner

Deborah Slaton, *Landscape Historian*

Timothy Penich, *Historical Architect*

Period Architecture

Christopher Quirk, *Historical Architect*

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Appendix A

Table of Mitigation Measures

Environmental Assessment Mitigation Table	
Resource	Mitigation
General Considerations/Site Design and Construction	<p>General:</p> <ul style="list-style-type: none"> Where necessary for resource or visitor protection, work areas would be identified with construction fence, silt fence, or some similar material prior to any activity. The fencing would define the work zone and confine activity to the minimum area required. All protection measures would be clearly stated in the construction specifications, and workers would be instructed to avoid conducting activities beyond the work zone. Disturbances would be limited to areas inside the designated construction limits. No machinery or equipment would access areas outside the work limits. Construction equipment staging would occur within previously disturbed areas as much as possible. All staging and stockpiling areas would be returned to preconstruction conditions following construction. Contractors would be required to properly maintain construction equipment (i.e., mufflers and brakes) to minimize noise. All tools, equipment, barricades, signs, surplus materials, and rubbish would be removed from the project work limits upon project completion. <p>Site Design and Construction:</p> <ul style="list-style-type: none"> Identify and avoid unstable slopes and local factors that can cause slope instability. Develop a stormwater management plan to ensure compliance with regulations and prevent off-site migration of contaminated stormwater or increased soil erosion. Minimize the planned amount of land to be disturbed. Re-establish the original grade and drainage patterns to the extent practicable.
Natural Resources	<p>Past and Ongoing:</p> <ul style="list-style-type: none"> Ongoing park staff management and maintenance of turf would continue. Ongoing maintenance of trees and other vegetation within the park would continue. When sites are disturbed by maintenance or construction activities, park staff would re-establish vegetation based on recommendations of existing resource plans. <p>Future and Required:</p> <ul style="list-style-type: none"> An Erosion and Sediment Control Plan would be developed before starting the project. Included would be specific practices for controlling erosion and preventing management-caused sediment from reaching the drainage. Compliance would be ensured by frequent inspections. Erosion and sediment controls would be employed as needed and as required by regulations during construction to reduce soil erosion. In order to minimize the potential for long-term impacts to soils during construction, erosion and sediment
Soils and Geology	

Environmental Assessment Mitigation Table	
Resource	Mitigation
Vegetation	<p>control measures would be implemented for each project undertaken for construction.</p> <ul style="list-style-type: none"> ▪ In order to minimize the potential for long-term impacts to soils, a strategy would be developed for implementation priorities and phasing of the proposed actions to allow sufficient time for re-stabilization of soils after completion of each phase. ▪ In order to minimize or help limit spread of invasive plants, sterile soils would be implemented for each project undertaken for construction. Sterile soils have undergone heat or chemical processing to kill any pathogens and seeds that are in it. Sterile soil would be less likely to spread diseases or weeds. ▪ Cut and fill amounts would be balanced to minimize the need for import or export of soil. ▪ Temporary barriers would be provided to protect existing trees and shrubs that are not identified for removal during construction activity. ▪ Vegetation filter strips would be used to filter and clean sediment, organic material, nutrients, chemicals, and other pollutants from run-off water as it leaves a non-point source. ▪ To reduce the potential for erosion, and to accelerate the re-establishment of vegetation, disturbed or denuded areas would be re-vegetated upon completion of construction operations. ▪ To further reduce the potential for sedimentation and contamination impacts to surface waters, proposed impervious surface features such as walking paths would be designed to minimize surface areas to the extent practicable.
	<p>Water Resources/Flood plains</p> <ul style="list-style-type: none"> ▪ Impacts to wetlands and other water resources will be avoided and minimized to the fullest extent possible, and best management practices will be utilized to minimize erosion and sedimentation. ▪ Best Management Practices (BMPs) would be required to support the implementation and management of actions taken in the preferred alternative. Refer to established BMPs for water quality actions. The NOAA Great Lakes Environmental Research Laboratory Strategic Plan and the Village of Put-in-Bay have established BMPs. ▪ Plan and schedule all construction activities to prevent erosion and sedimentation, which would cause possible adverse impacts to water resources and floodplains. ▪ Construction would be halted during times when soils would be too wet for equipment to operate without increasing the potential for water resource degradation. ▪ The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Local floodplain administration contact information can be found at:

Environmental Assessment Mitigation Table	
Resource	Mitigation
Endangered Species	<p>http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf</p> <ul style="list-style-type: none"> Because federally listed species as well as state listed species fall within the range of the project area and a one-mile radius beyond as defined by U.S. Fish and Wildlife Service, the park will coordinate with the USFWS before any construction begins and during construction if the project has potential to disrupt species habitat. Monitoring would be conducted before and during construction by an individual trained to identify Lake Erie water snakes. The site should be walked daily prior to any earthmoving activity to ensure no water snakes are within the work area. If Lake Erie water snakes are encountered during winter excavation, operations should cease immediately, and the monitoring individual should contact Nathan Reardon, DOW Compliance Coordinator at 614-265-6741 and the U. S. Fish and Wildlife Service's Columbus, Ohio Field Office at 614-416-8993. Any holes or trenches that are dug should be filled in as soon as possible to prevent water snakes from inadvertently falling into them and becoming trapped. Holes or trenches should be inspected for Lake Erie water snakes prior to being filled.
Cultural Resources	<p>Past and Ongoing:</p> <ul style="list-style-type: none"> Monitoring of archeological sites would occur to determine visitor safety and resource protection concerns. Monitoring water resource margins and shoreline would continue for erosion control. Monitoring the Memorial column and plazas for any damage, potential damage, or vandalism would continue. Prior to all construction or maintenance activities, cultural resources are identified and avoided to the extent possible. Ongoing management focusing on retaining and enhancing the general historic character of the Memorial and Grounds would continue. <p>Future and Required:</p> <ul style="list-style-type: none"> All activities would comply with the Secretary of the Interior's Standards and Guidelines for Preservation of Historical Buildings, Structures, the Cultural Landscape, and Archeology. All ABAAS accessibility interventions would be guided by Preservation Brief 32: Making Historic Properties Accessible. Site condition assessments by NPS-approved archeologists would be part of project-specific surveys.

Environmental Assessment Mitigation Table	
Resource	Mitigation
	<ul style="list-style-type: none"> NPS would coordinate with the SHPO throughout the course of the project to protect and provide mitigation agreements for resources affected by the preferred alternative.
Visitor Use and Experience	<p>Past and Ongoing:</p> <ul style="list-style-type: none"> Incidences of human interactions would be monitored. Visitation data would be monitored through various methods such as visitor survey, transportation data, and concessioner data. Periodic visitor surveys and data collection would be used to determine visitor use patterns, visitor characteristics, visitor use conflicts, and visitor preferences and satisfaction with interpretive and recreational opportunities, programs, services and facilities. Resource condition surveys would be conducted as needed. Continued management of the Memorial and Grounds would facilitate the visitor's understanding of the significance of the site and the Battle of Lake Erie in 1813. NPS facility managers would continue to monitor areas used by visitors for signs of vegetation disturbance, trampling, erosion, or the development of social trails in the designed historic landscape. Existing facilities would be retrofitted and new facilities designed to meet Leadership in Energy and Environmental Design (LEED) standards to demonstrate the NPS commitment to protect our natural and cultural resources for future generations. <p>Future and Required:</p> <ul style="list-style-type: none"> Visitor use and access to areas of highly sensitive and vulnerable cultural or natural resources would require mitigation measures. Appropriate activities in these areas would be limited to research and passive recreational uses. Interpretive programs and exhibits would provide information and interpret ongoing research activities. Visitor Center would be made fully ABAAS accessible as will the pedestrian circulation system throughout the park, and the Memorial plazas to the extent decided upon.
Human Health and Safety	<p>Past and Ongoing:</p> <ul style="list-style-type: none"> General public would be informed of construction activities or other management or maintenance activities through press releases and general interpretive presentation. No public access would be allowed to any areas of construction. Appropriate regulatory and/or enforcement agencies would be notified prior to any construction to assist in safely managing pedestrian or vehicular traffic. Warning signs

Environmental Assessment Mitigation Table	
Resource	Mitigation
	<p>would be posted along village roads and pedestrian circulation in the park and the community.</p> <p>Future and Required:</p> <ul style="list-style-type: none"> ▪ The ongoing and required measures already in place that ensure visitor safety would continue where appropriate in the implementation of the actions proposed in the preferred alternative. ▪ NPS staff would mitigate impacts arising from increases in visitation due to expanded facilities and interpretation at the park.

Appendix B

Consultation Letters and Communication

Comment Analysis Report

NPS Response to Public and Agency Comments
And
Errata Sheets For the Public Review Draft of the
Cultural Landscape Treatment Plan and Environmental Assessment
Perry's Victory and International Peace Memorial
Put-in-Bay, Ohio
November 2018

Public Review Period for the CLTP/EA was from March 24-April 24, 2018. Below are comments from the public and agency comments and NPS response to comments incorporated into the final document.

PEPC Site:

1. Comment: *"The proposed plan is looking great, thank you for all of your time and dedication to this project. My husband and I truly enjoy the National Parks and appreciate all you do. Our input is positive; the addition of park benches, sidewalks leading along the side of the Monument, and new additional parking area are just what is needed. The replacement of new vegetation is understandable, though we will be sad to see the old pine tree removed. Would it be possible to place educational plaques along or in the walkway that goes to the new sidewalks to the East and West of the Monument? While visiting the WWII Memorial in Washington, D.C., the east entrance had depictions of the effects of the war at home and overseas. Not trying to duplicate it, but the education would be another way to get the visitors to interact within this National Park. Thank you again!"*

NPS Response: Thank you for your support of the park. Within the CLTP/EA and the preferred alternative there are recommendations for expanded interpretation to enhance the visitor experience. This is a fundamental value stated in the park's *Foundation Document*. The Park has a funding request in the system to *Create a Visitor Experience Plan* for the park. This would provide recommendations for outdoor media including wayfinding signs, wayside exhibits, or 3-dimensional exhibit elements as well as digital media such as a mobile app or video tour. There are no changes to the CLTP/EA based on this comment.

2. Comment: *"Amphitheater!"*

NPS Response: The 1994 Cultural Landscape Report and National Register nomination both give clear direction on preserving the historic core of the park and this preservation directive is supported in this Treatment Plan as well. Given this mandate and the condition and use needs of the remaining green space an amphitheater while desirable is not feasible. There are no changes to the CLTP/EA based on this comment.

3. Comment: *"I have been going to Put-in-Bay since I was a child. These plans to upgrade the grounds are fabulous! Now that I have some age on me, I appreciate that it will be more handicapped accessible, too. I appreciate that the views will be preserved, as well as the monument itself. Nice work, folks! I can't wait to see the changes!"*

NPS Response: Thank you for your support of the park. There are no changes to the CLTP/EA based on this comment.

4. Comment: *“Remove the last few power poles and wires by burying them for a better view from the village park.”*

NPS Response: We concur with your comment and it is addressed in the Cultural Landscape Treatment Plan on page 3-15. There are no changes to the CLTP/EA based on this comment.

5. Comment: *“Is it possible to install a LED light system on the monument similar to those on many bridges and skyscrapers? Colors could be controlled remotely and changes for holidays and special causes. I know at one point there was a Twitter account linked to the Terminal Tower in Cleveland and you could interact with the person controlling the lights and sometimes even get them to change the colors for you. I think it would be pretty neat to have the monument lit in colors corresponding to what is going on that day/week/etc. Red, white, and blue for the fourth with fireworks around it. I can only imagine what September 11th would look like with the lights on the ground and the monument matching.”*

NPS Response: Current plans include replacing the exterior lights that illuminate the Memorial using entrance fee revenue in 2020. The timing of this could change depending on actual revenue and potential shifts in priorities. We will consider including this when that lighting system is replaced. There are no changes to the CLTP/EA based on this comment.

6. Comment: *“Would you please consider installing a new walkway that would connect the seawall and the plaza by the public restrooms under the monument. Walking through the goose droppings in the grass can be tricky and a sidewalk would at least let us see them more clearly. Thanks for this opportunity to comment.”*

NPS Response: A walkway has been provided in the preferred alternative from the south seawall to the existing restrooms. From the north seawall, visitors would cross Bayview Avenue to access the sidewalk that leads to the existing restrooms. There are no changes to the CLTP/EA based on this comment.

7. Comment: *“As an official representative of the Put-in-Bay Garden Club on South Bass Island in Lake Erie, I would like to comment on the proposed landscape design for the Perry Memorial Monument grounds. The Garden Club is in charge of maintaining gardens and raised beds we have planted on the bathing beach adjacent to the South Wall of the Monument grounds. We have raised concerns in the past with park personnel about how the Monument Wall (seawall) is affecting the bathing beach in terms of algae accumulation as well as erosion. Our Beach chairperson Jody Frimel has met over the past few years with Park personnel and with engineers to discuss our concerns. We hope you will address these concerns as you consider the “South Wall maintenance” mentioned in your report. We look forward to hearing from you in this regard. Thank you in advance for your consideration.”*

NPS Response: Repairs and/or replacement of the seawalls is currently formulated in the National Park Service Line-item Construction program for 2021. We will begin the planning for this work in 2019 and it is our hope that we can address these concerns as part of this project. Once planning and design is underway we will engage the Village of Put-in-Bay and other interested parties in the process. There are no changes to the CLTP/EA based on this comment.

8. Comment: *“Thank you for the opportunity to comment on the Draft Cultural Landscape Treatment Plan and Environmental Assessment. We agree that the preferred alternative three was the best. We liked that it used existing sidewalks and added open air pavilions for programs and seating areas to watch the sunset. That is an excellent idea to have a spot there for the public to enjoy the view. The idea of more exhibits throughout the park*

area especially in the peace garden/approach area and just to the north of the current Dairy Isle would be well used. The addition of more trees to screen buildings and to balance the monument would be great. We are encouraged to see that tree species native to the island will be used in any additional plantings. It is important not to plant/replace species that may potentially be invasive like the Norway Maple.

This increases changes of introducing more invasive, non-native species to the fragile island environment.”

NPS Response: Within the CLTP and the Preferred Alternative, Norway maple is not on the list of recommended species for planting in the park. There are no changes to the CLTP/EA based on this comment.

9. Comment: *“Using natives wherever possible will provide wildlife habitat by providing food and shelter for native insects. “Bringing Nature Home” by Doug Tallamy is a great reference for providing food, shelter, and resources for pollinators by incorporating natives everywhere. If the Austrian pines are to be replaced, we like the idea of additional coniferous trees as deciduous trees would be more of a maintenance concern. Eastern Red Cedar is native to the island and are very hardy – can withstand rock, drought, wind, ice, and provide more cover. They can be trained well.”*

NPS Response: When the time comes to implement the rehabilitation of the Memorial column and plaza and the subsequent removal of the Austrian pines, replacement species will be judiciously chosen to meet the vegetation maintenance and management goals for the park. There are no changes to the CLTP/EA based on this comment.

10. Comment: *“In areas where shrubs and annuals would dominate, again please consider native and local choices that would maximize habitat for pollinators (milkweed, nectar plants, native shrubs.) “The Flora of the Lake Erie Islands” by Duncan and Stuckey that you reference would give some suggestions. Sweetfern is indeed native to the sandy, Oak Openings area in Ohio but may not do as well with our slightly alkaline soils. Cotoneaster is not yet considered an invasive groundcover but it would be better to use something native whenever possible.”*

NPS Response: Within the context of the CLTP and the preferred alternative, native species are considered but only if appropriate for the island climate and for park goals for vegetation maintenance and management. There are no changes to the CLTP/EA based on this comment.

11. Comment: *“We would like to see additionally a small demonstration wetland with interpretive signage. This is a unique opportunity for 750,000 people a year to hear about the importance of wetlands. With the lower elevations on the western portion of the park, that area would be well suited for a small wetland with signage about the wetland that was once on site. This area is poorly drained as evidenced by recent flooding with the higher water levels we have experienced recently. It would be appropriate for the NPS to provide this educational opportunity with their involvement in the Great Lakes Restoration Initiative program. It could showcase native wetland species and areas that have been preserved in the islands area. The park has had an active program about invasive species and including more natives and an educational display on island native habitats, especially wetlands would be very appropriate and welcomed by the community. This wetland could be added to the area to be planted in trees and not detract from the visual image of the monument itself.”*

NPS Response: Management and maintenance of wetlands poses a challenge for park staff and the park is managed and interpreted as a cultural resource. Natural resources are important as well, but the cultural landscape is managed as a historic designed landscape with specific characteristics and aesthetics from the original design of the Memorial and its grounds. Our charge is to preserve the historic designed landscape and provide visitor experiences where appropriate. Any attempt at providing a demonstration wetland would create more maintenance challenges. There are no changes to the CLTP/EA based on this comment.

Written Responses (Emails or Letters) During the Review Period:

1. Comment: *“No new trees to be planted on the Peace Garden not to block view from Reenactment Marker in park.”*

NPS Response: Planting plan makes every effort to preserve historic viewsheds. There are no changes to the CLTP/EA based on this comment.

2. Comment: *“Leave Birch trees in front of the Visitor Center when, where the trees are planted.”*

NPS Response: The removal of the birch trees in the preferred alternative fulfills a park objective of opening up the views to the main entrance to the Visitor Center, affording visitors clear orientation and invitation into the front door of the Visitor Center. There are no changes to the CLTP/EA based on this comment.

3. Comment: *“Focus parking on the east side on Memorial even if you have to add a parking lot on the street by the Dorms. Parking to the west will be used for Downtown. Yes, I will abuse it.”*

NPS Response: The only parking to the west that is proposed is angled parking on Bayview between Toledo and the Memorial. You are correct, some may use this for downtown access. If we find this to be the case we can notify the police who will issue parking tickets or we can try other ways to discourage this type of use. The addition of a parking lot to the east near the housing/maintenance area could create conflict with a potential additional housing unit and interpretive node for viewing the lake/sunsets. There are no changes to the CLTP/EA based on this comment.

3. Comment: *“Leave Austrian pines but try to trim them. The erosion problem is mostly due, to the shade from the wall. No problem on the west side.”*

NPS Response: As described in the preferred alternative, the Austrian pines will remain until they have to be removed in order to accommodate the complete rehabilitation of the Memorial plazas. There are no changes to the CLTP/EA based on this comment.

E. “Remove telephone poles on Bay View; go underground.”

NPS Response: We concur with your comment and it is addressed in the Cultural Landscape Treatment Plan on page 3-15. There are no changes to the CLTP/EA based on this comment.

F. “Leave existing sidewalks. “Yes to the sidewalk at the North Seawall. Maybe tie a rounded sidewalk into the existing sidewalks for the handicapped and wheelchairs.”

NPS Response: This is a good comment. We will add a connection from the North Seawall in the final document and address ABAAS standards for connection to the North Seawall. Accessible crosswalk on Bayview Avenue was added and an accessible segment of sidewalk leading to the North Seawall.

2. Comment: Arrow Institute: *“All in all, I appreciate the physical features and greeneries. But I believe the pathways going to and around the Memorial should have items of interest displayed; with storyboards (in weather free-metal or covered) leading to and around them. Rather than walking just back and forward as one pathway. There is just too much about the battle not being told. The story personalities and the battle between nations are too exciting not to tell us-historical facts seeking visitors-more. I would love to see a large facsimile of the medal given to Perry by our Congress and a large print of the painting of the Battle of 1812 as hung in the halls of Congress...it has a diverse crew shown in it. Blacks as well as whites were in the boats I remember at*

elementary school being told of a boatful of sailors sneaking away and taking residency in Sandusky...also told to me by an elderly neighbor, last name of Perry, who was related and lived on Perry Street...a similar story. With digital displays and computers, the battle of 1812 could be easily updated. Besides models of the ships, like Niagara, Chesapeake et al and those of the British, the crew members name and from where they lived or which state or nation they were born. I know some black sailors escaped to Anherburg/Canada and many became citizens there. This should be noted. Meanwhile thank you for your service.”

NPS Response: These are good comments. We think this is important too and have a funding request in the system to create a *Visitor Experience Plan* but it is not currently formulated to receive funding. This plan would provide recommendations for outdoor media including wayfinding signs, wayside exhibits, or three dimensional exhibit elements as well as digital medial such as a mobile app or video tour. Once this plan is developed we can focus attention on developing the ideas and creating outdoor interpretive experiences that do not currently exist. This idea has great potential in reaching audiences who don't visit the visitor center or Memorial. There are no changes to the CLTP/EA based on this comment.

3. Comment: (First Email): *“The history of the natural landscape around Perry’s Monument predates the vast grass lawn of the 1990s and beyond. I attended The Ohio State University’s F.T. Stone Laboratory in 1964 and 1975 and remember students and professors collecting wetland plant species within the shadow of the Memorial. I’m certain that specimens were deposited in The Ohio State University’s Museum of Biological Diversity. A restored wetland would attract numerous species of amphibians, reptiles, mammals, and birds including our national Bald Eagle. A natural area in such a public space would attract nature lovers of all types, birders, and photographers as well as all ages.*

There are many Ohio professionals that could be consulted about a wetland restoration including staff at Stone Laboratory, Ohio Wetlands Association, Ohio Natural Areas and Preserves Association, Ohio Division of Natural Areas and Preservers, the Lake Erie Island Conservancy, and the Cleveland Museum of Natural History.”

(Follow-up to the above email by another person): *“I echo the above comments, as if she took the words out of my mouth. There were still slides available of the Perry’s Monument wetland when I retired from Stone Lab in 2011. Hopefully, they still exist.”*

NPS Response: Our charge is to preserve the historic designed landscape and provide visitor experiences where appropriate. Natural resources are important as well as the cultural landscape but in this particular location aesthetics from the original design of the Memorial and its grounds are paramount. There are no changes to the CLTP/EA based on this comment.

AGENCY REVIEW:

Ohio Department of Natural Resources

Fish and Wildlife: The Division of Wildlife (DOW) had the following comments:

1. Comment: *“The DOW recommends that impacts to wetland and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.”*

NPS Response: We concur with this goal and will make sure this is part of our mitigation table within the document. This goal has been added to the Mitigation Table for Natural Resources within the CLTP/Environmental Assessment.

2. Comment: *“The project is within the range of the Indiana bat (Myotis sodalist), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees: shagbark hickory (Carya ovata), shellbark hickory (Carya laciniata), bitternut hickory (Carya cordiformis), black ash (Fraxinus nigra), green ash (Fraxinus pennsylvanica), white ash (Fraxinus Americana), shingle oak (Quercus imbricaria), northern red oak (Quercus rubra), slippery elm (Ulmus rubra), American elm (Ulmus Americana), eastern cottonwood (Populus deltoids), silver maple (Acer saccharinum), sassafras (Sassafras albidum), post oak (Quercus stellata), and white oak (Quercus alba). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net night per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.”*

NPS Response: Implementation of the preferred alternative will basically only remove the Austrian pines which are not on the above list for roosting trees for the Indiana Bat. In fact, some of the proposed trees that would be installed with the implementation of the preferred alternative would be taken from the list you have provided. We will add specific tree species within the description of the Preferred Alternative and note its usefulness for habitat for the Indiana bat.

3. Comment: *“The project is within the range of the Lake Erie water snake (Nerodia sipedon insularum), a state threatened species and federal species of concern. Hibernation habitat for this species includes suitable tree roots or hollow tree bases and human-made structures such as walls. If the project construction is within 226 feet of the shoreline, excavation activity should not occur during the hibernation season of October 15 to April 15 or when the air temperature is below 60 degrees Fahrenheit. Excavation of any kind should be completed only when both air and ground temperatures are above 60 degrees Fahrenheit on the day of work and for five consecutive days prior to the day of work. Construction activities including shoreline rip-rap placement should also not occur during the hibernation season of October 15 to April 15 or when the air temperature is below 60 degrees Fahrenheit. Heavy machinery should be limited to existing roads, ramps, or areas with little or no likelihood of supporting snakes. If the project requires removal of trees greater than 6” (dbh) that are within the 226 feet zone, only the above-ground portion of the tree should be removed. The root mass should be left underground so as not to disturb hibernation locations. Rock-filled timber or steel crib docks and rip-rap shoreline protection should be used rather than sheet steel. Any holes or trenches that are dug should be filled in as soon as possible to prevent water snakes from inadvertently falling into them and becoming trapped. Holes or trenches should be inspected for Lake Erie water snakes prior to being filled. Monitoring should be conducted before and during construction by an individual trained to identify Lake Erie water snakes. The site should be walked daily prior to any earthmoving activity to ensure no water snakes are within the work area. If Lake Erie water snakes are encountered during winter excavation, operations should cease immediately, and the monitoring individual should contact Nathan Reardon, DOW Compliance Coordinator at 614-265-6741, and the U.S. Fish and Wildlife Service’s Columbus, Ohio Field Office at 614-416-8993. If the project does not contain suitable hibernation habitat (e.t., locations composed purely of topsoil covered by short grasses and forbs with no crack or crevices present, ground disturbing activities during the hibernation period (October 15 to April 15 are not likely to impact the species.”*

NPS Response: Since most of the project area landscape is composed of topsoil covered by short grasses and forbs with no cracks or crevices present, ground disturbing activities from October 15 to April

15 are not likely to impact the species. We will add in our Mitigation Table under Natural Resources the comment concerning filling holes or trenches and monitoring that should be conducted before and during construction by an individual trained to identify Lake Erie water snakes.

4. Comment: *“The project is within the range of the Kirtland’s warbler (Setophaga kirtlandii), a state endangered and federally endangered bird. This species migrates through Ohio in the spring and fall, traveling between its breeding ground in Michigan, Wisconsin, and Ontario and its winter grounds in the Bahamas. While migration occurs in a broad front across the entire state, approximately half of all observations in Ohio have occurred within 3 miles of the Lake Erie shoreline. Migrating birds usually forage in forested or shrub/scrub habitat and may stay in one area for several days. Because so much of the southern Lake Erie shoreline is already developed, and stopover habitat is already so fragmented, the DWO recommends that this stopover habitat, (ie. forested or shrub/scrub area), within three miles of the shoreline be preserved whenever possible. If clearing of suitable habitat cannot be avoided, to preclude adverse effects to Kirtland’s warblers, clearing within 3 miles of the Lake Erie shoreline should be avoided from April 22nd through June 1st, and from August 15th through October 15th.”*

NPS Response: Implementation of the Preferred Alternative for this project will not involve clearing of forested or shrub/scrub areas, used by the Kirtland’s warbler as it migrates across Ohio. The project site is mainly an open designed landscape with mown turf cover and trees planted associated with the visitor center and associated buildings to the west and the residential housing for park staff to the east. There are no changes to the CLTP/EA based on this comment.

5. Comment: *“Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish and Wildlife Service.”*

NPS Response: We will coordinate on the project with U.S. Fish and Wildlife Service. We will also add this commitment to the Mitigation Table under Natural Resources.

Water Resources: The Division of Water Resources had the following comment: *“The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administration contact information can be found at the website below.”*

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

NPS Response: We will contact the floodplain administrator concerning the possible need for any floodplain permits or approvals for this project. This will be added to the Mitigation Table under Natural Resources.

State Historic Preservation Office

Ohio History Connection

Letter dated May 15, 2018: From Lisa Adkins, Architecture Reviews Manager, Dept. of Resource Protection and Review to Barbara Fearon, Superintendent, NPS-PEVI:

“We have reviewed the information submitted describing the proposed project alternatives and their potential effects to historic properties. It is our understanding that no projects are currently being proposed for implementation. We also understand that the Environmental Assessment language included with this plan was not intended as a substitution of NEPA process steps for a standard Section 106 review of any future projects

that may be implemented in accordance with the plan's recommendations. We offer the following general comments to follow up on our discussions:

- 1. We recommend that a PDF or paper copy of the 1994 Cultural Landscape Report should be included with this plan for reference, since it is meant to be a complementary piece to that foundation document. We also recommend that PDF or larger scale versions of any available historic site plans or elevations of hardscape features by Freedlander should be similarly included with this plan.*
- 2. Given our experience with recent development of non-NPS property in view of the Memorial, we recommend more detailed descriptions and figures should be included in this plan so as to fully document the views and vistas both to and from the Memorial. We fully anticipate a continuing need for considering viewshed impacts as part of reviews that are not controlled by NPS and it's our opinion that this document can be enhanced so that the critical views and vistas are more clearly identified for planning and viewshed purposes. For instance, Page 3-8 Line 20 suggests that only the view from the north and Gibraltar Island are significant, which is clearly not the case. You might consider some discussion of distances within which key views should be closely evaluated or height discussions for loose review of new development on the island. For the subsequent discussion at Page 3-15 and elsewhere, it may be worthwhile to draw distinctions between external and internal views (or off-land vs. on- island views). This would support the alternative discussion later in the plan about establishing view corridors for visitors from the Visitor Center approach.*
- 3. Page 3-4: Treatment Guidelines should include a clear statement about consideration of the Memorial's relationship to neighboring property owners in making treatment decisions as well as views of the local community and historic groups.*
- 4. Page 3-6: Vegetation management would be enhanced by adding maintenance needs and life span projections for replacement species.*
- 5. Page 3-7: New Design and Construction needs to clearly state where "Documentation" will be maintained as records – our assumption is that they would be retained both at PEVI and elsewhere within NPS.*
- 6. Figure 3-24 shows an existing monument on site that is proposed for relocation. We recommend that a more detailed section about the limits on display of monuments and memorials would supplement existing policies and make it clear that such objects should be avoided on site.*
- 7. Page 3-19: Views and Vistas mentions the possible creation of an observation point. Please provide a map or figure that shows the possible location.*
- 8. Page 3-21 Concept Alternatives: We do not support the curvilinear paths approach in concept A, as it does not fall within the original design intent of the Freedlander plans. We do support the addition of paths and walkways that were part of the original plan, but never executed, as proposed in concept B. In general, effects on historic properties would be less should the treatment recommendations follow the description found in Concept B.*
- 9. Chapter 4: Environmental Assessment was somewhat difficult to follow, but we recognize that for most future actions under the Alternatives, NPS will consult with SHPO and other consulting parties with the expectation that it may be necessary to resolve adverse effects related to new construction not in keeping with the Freedlander plan.*
- 10. We recommend that before any field investigations are considered, NPS should consult with SHPO about how to plan for the appropriate level of effort for the identification of archaeological resources.*

11. Finally, for Alternative 3, currently being evaluated as the likely preferred alternative, we remind NPS that according to guidance from the Advisory Council on Historic Preservation, it is not appropriate to issue a FONSI for the EA until we have resolved adverse effects.”

NPS Response: The CLTP is intended to update the treatment portion of the 1994 cultural Landscape Report, with the goal of providing universal access and compatible spaces away from the monument for enhanced visitor enjoyment. The plan provides guidance for park maintenance staff for day to day stewardship activities as well as a long- term vision for park management as they seek funding for large scale repair and rehabilitation projects. We recognize that while National Park Service (NPS) may need to provide additional details as we work through the section 106 process for the CLTP/EA. Most of the projects currently provide sufficient detail to determine the assessment of effect and consultation will occur within the existing service-wide Programmatic Agreement. These projects include:

- Adding the four new pedestrian walkways flanking the memorial
- Adding new plantings on the berms and at the northern corner of the lower plaza
- Changes to parking configuration along Bayview Avenue
- Addition of visitor “nodes” with compatible seating at each end of the south seawall
- Construction of a compatible new black powder storage building
- Provision for a pedestrian connection from NPS property to the beach
- Addition of a contemplative node at the northeast corner of the park

The CLTP/EA addresses the issue of universal access to the plazas by proposing alteration of the historic stair configuration to include a system of flanking ramps. This approach reflects the Beaux-Arts design vocabulary found elsewhere in the memorial and complies with the Secretary of the Interior’s Standards for a rehabilitation treatment. The CLTP currently includes a determination of adverse effect based on removal of this historic fabric and changes to the original stair design. The stair changes will be implemented as part of the overall repair of the plazas slated for construction. This project would require replacement of the original materials regardless of the addition of the ramp system. Additional detail will be forthcoming as we plan for these repairs. That project will be managed by the Denver Service Center and will require additional design services slated for Section 106 compliance review. At that point, design review and consultation will take place to ensure that the ramps have no adverse effect. Acknowledging this commitment to additional consultation for the stair project, we propose that your office consider a determination of no adverse effect for the overall preferred alternative found in the CLTP/EA. We would like to schedule a phone call with your office to discuss this proposal.

Regarding the comments from your May letter, we offer the following responses:

1. We will continue to make the 1994 Cultural Landscape Report available to the public and agencies on the internet via a number of NPS websites, including eTIC. We will not be combining the previous plan with the CLTP/EA as it would be cumbersome for the park and others to use it as a reference, and it is intended to be a stand-alone guidance document.
2. We have added language to the CLTP/EA that documents the importance of views to and from the memorial so that the park can continue to weigh in on adjacent development that may negatively impact scenic quality.
3. The process of public engagement used as part of this project will be documented in the CLTP/EA and the reciprocal relationship between the monument and its neighbors will be represented in plans, drawings, and narrative.

4. We may strive to address lifespan and vegetation maintenance needs in the CLTP/EA but this information is more appropriately located in the park's Facility Management Software System, a NPS-wide program for scheduling our maintenance activities.
5. We can include this information in the CLTP/EA; information from this project will be stored and can be accessed via eTIC and other websites.
6. This is a very good suggestion and will be added to plans, drawings, and narrative.
7. The observation point is captured at the "node" at the northeast corner of the park along Bayview Avenue.
8. Agreed, Alternative "B" is the preferred NPS alternative as well.
9. Agreed, future Section 106 compliance will occur under the provisions of the 2016 Service-wide Programmatic Agreement.
10. Potential impacts to archeological resources are evaluated through discussion and involvement of NPS archeologists at the Midwest Archeological Center. Staff archeologists have reviewed the CLRP/EA and serve as cultural resource advisors on the Interdisciplinary Team for all Section 106 reviews.

The NPS seeks to continue consultation with Ohio History Matters as per 36 CFR 800.2.4(b)(2). Our findings indicate that the CLTP/EA preferred alternative poses no adverse effect to the historic memorial landscape, and any potential adverse effect that may occur from the stair rehabilitation will be avoided through compatible design that follows the Secretary of Interior's Standards for Rehabilitation.

Ohio History Connection

Letter dated September 19, 2018: From Lisa Adkins, Architecture Reviews Manager, Dept. of Resource Protection and Review to Barbara Fearon, Superintendent NPS-PEVI.

"This letter is in response to your correspondence, received on August 9, 2018. We also discussed this plan with you and Marla McEnaney on July 18, 2018, as well as a consultant representing the Plan contractor CHG. Our comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800, "Protection of Historic Properties".

We appreciate the additional information that was provided about the timing of eight small projects that are related to visitor experience related landscape projects, all of which are currently in planning stages. We have no objection to consultation for these small projects being concluded through the use of the existing service-wide Programmatic Agreement.

More complex projects that require more detailed design consultation, such as the creation of new ramps and alterations to the historic stair configuration, are likely to need additional study in the next 5 to 10 years. We agree that there are valid concerns about adverse effects resulting from removal of historic design features and the addition of modern accessibility improvements. Since the stair/accessibility project is not currently scheduled for implementation, we recognize that future consultation involving staff from PEVI, NPS regional office and the Denver service Center will be necessary before that project can advance.

With the understanding that future consultation will be necessary to ensure that the stair/accessibility improvements will follow the Standards for Rehabilitation, we agree with your determination that the preferred Alternative B from the draft Plan is not likely to have adverse effects on the historic memorial and its designed landscape. Please let us know when you would like to have our participation in discussions about the stair/accessibility project."

NPS Response: Thank you for your concurrence. We will proceed to revise the final CLTP/EA to respond to your comments and finalize the Findings of No Significant Impact (FONSI). We understand and concur with the need for further consultation to ensure that the stair/accessibility improvements will follow the *Standards for Rehabilitation*.



United States Department of the Interior

NATIONAL PARK SERVICE

PERRY'S VICTORY AND INTERNATIONAL PEACE MEMORIAL

93 Delaware Avenue, P.O. Box 549

Put-in-Bay, Ohio 43456-0549



PEVI 1.B.1.A.2

January 19, 2017

Amanda Schraner Terrell
Deputy State Historic Preservation Officer
Ohio History Connection
800 E. 17th Avenue
Columbus, OH 43211-2474

Re: Cultural Landscape Treatment Plan and Environmental Assessment
Perry's Victory and International Peace Memorial
Park Notification of Combination NEPA/Section 106 Compliance

Dear Ms. Terrell:

Perry's Victory and International Peace Memorial (PEVI) is a 14.5-acre national park in Ottawa County, Ohio. The site is located on South Bass Island, in the western basin of Lake Erie. The island is approximately three miles long by one mile wide. The park spans a narrow isthmus (about 250 yards wide) between the village of Put-in-Bay and the eastern portion of South Bass Island (see attached USGS maps). Much of the island is now developed as resort and summer housing, but farming and viticulture predominated in the past. The park is a commemorative, designed landscape associated with the Beaux-Arts School of design. Significant features include open lawns, trees and shrubs, sloped terraces, sidewalks, seawalls, and the raised plaza and memorial column standing at the center of the site. From the observation platform near the top of the memorial, visitors may view the site of the victory of U.S. Commodore Oliver Hazard Perry and his forces over those of the British Navy in the Battle of Lake Erie during the War of 1812. Set in the middle of its original grounds, the massive Doric column of Milford pink granite topped by an immense bronze lantern rises 352 feet, as if directly from the waters of that battle, to dominate the landscape (see attached photographs.) The column and its grounds are an excellent example of the harmony of building and landscaping that is integral to the Beaux-Arts style in America, with its monumental classicism in architecture set within a designed, formal landscape. Management of this site was transferred to the National Park Service (NPS) on July 6, 1936.

In 1976, National Park Service submitted a nomination for Perry's Victory and International Peace Memorial to the National Register of Historic Places, and the site was listed on July 25, 1979. The nomination included only part of the park within the original grant of the Perry's Victory and International Peace Memorial land to the U.S. The focus of the original nomination was the memorial column and its surrounding plaza. At the time the nomination was written, cultural landscapes were rarely recognized, and so were not discussed. Perry's Victory and International Peace Memorial was updated in 2014 to include further development of the park's grounds, expansions of the National Register's classification regarding Areas of Significance, refinement of other National Register Criteria, and the inclusion of cultural landscapes as nominated resources. In addition to the nomination and its

update, other planning documents developed for PEVI include: a cultural landscape report (1994), a cultural landscape inventory (2011), a long range interpretive plan (2011), and the park's foundation document (2012).

A NPS contractor is preparing an update of the 1994 cultural landscape report (CLR) for Perry's Victory and International Peace Memorial by providing at least two alternatives for a revised treatment plan, accompanied by an environmental assessment to meet requirements for federal environmental policy compliance. The existing CLR was completed prior to approval of CLR standards and lacks sufficient direction for moving forward with intentional design additions and management of the landscape. The park has accrued features based on various types of planning decisions during the twentieth century. Guidance for preservation, removal, or rehabilitation of features within the park boundaries is needed and essential for the development of comprehensive treatment plan alternatives that encompass the entire designed landscape of PEVI (see attached project boundary map).

To comply with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) of 1966, as amended, an environmental assessment (EA) must be developed that will evaluate impacts of the proposed action in the treatment plan alternatives to natural and cultural resources. In accordance with Section 800.8(3)(c) of the Advisory Council on Historic Preservation's regulations (36 CFR 800), I am notifying your office in advance of the park's intention to use the EA to meet its obligations under Section 106 of the NHPA. This EA, which will contain the Assessment of Effect for all cultural resources potentially affected by the proposed project, will be available for your review and comment later this year.

This letter also serves as notification that we have begun the federal compliance process, and in order to comply, we are gathering information concerning existing resources within the project area. During this early stage in the process, we are seeking information on any cultural resource restraint or concern that may be a possible planning issue. If you are aware of any such issue, please do not hesitate to contact us.

At this time, we anticipate no significant cultural resource impacts associated with the project, and we look forward to receiving any guidance or comments you may have regarding the process or the project itself. Thank you for helping in this matter, and if you need any additional information or should you have any questions regarding this request, please feel free to contact me at (419) 285-2184 ext. 1225 or in writing at Perry's Victory and International Peace Memorial, 93 Delaware Avenue, P.O. Box 549, Put-in-Bay, OH 43456-0549.

Sincerely,



Barbara Fearon
Superintendent

Enclosure

cc: Jane Jacobs, CHG



United States Department of the Interior

NATIONAL PARK SERVICE

PERRY'S VICTORY AND INTERNATIONAL PEACE MEMORIAL

93 Delaware Avenue, P.O. Box 549

Put-in-Bay, Ohio 43456-0549



PEVI 1.B.1.A.2

January 19, 2017

Dan Everson
Field Office Supervisor
Ohio Field Office
U.S. Fish and Wildlife Service
4625 Morse Road, Suite 104
Columbus, OH 43230
Phone: 614-416-8993
Email: Dan_everson@fws.gov

Re: Cultural Landscape Treatment Plan and Environmental Assessment
Perry's Victory and International Peace Memorial
Informal consultation with U.S. Fish and Wildlife for Threatened and Endangered Species

Dear Mr. Everson:

Perry's Victory and International Peace Memorial (PEVI) is a 25-acre national park in Ottawa County, Ohio. The site is located on South Bass Island, in the western basin of Lake Erie. The island is approximately three miles long by one mile wide. The park spans a narrow isthmus (about 250 yards wide) between the village of Put-in-Bay and the eastern portion of South Bass Island. Much of the island is now developed as resort and summer housing, but farming and viticulture predominated in the past. The park is a commemorative, designed landscape associated with the Beaux-Arts School of design. Significant features include open lawns, trees and shrubs, sloped terraces, sidewalks, seawalls, and the raised plaza and memorial column standing at the center of the site. From the observation platform near the top of the memorial, visitors may view the site of the victory of U.S. Commodore Oliver Hazard Perry and his forces over those of the British Navy in the Battle of Lake Erie during the War of 1812. Set in the middle of its original grounds, the massive Doric column of Milford pink granite topped by an immense bronze lantern rises 352 feet, as if directly from the waters of that battle, to dominate the landscape (see attached photographs.) The column and its grounds are an excellent example of the harmony of building and landscaping that is integral to the Beaux-Arts style in America, with its monumental classicism in architecture set within a designed, formal landscape. Management of this site was transferred to the National Park Service (NPS) on July 6, 1936. The approximate UTM coordinates of the site are listed below. (See attached USGS map)

Latitude/Longitude Coordinates

The 1979 National Register listing gives the UTM Coordinates of the center of the Memorial column as E17 349020 4612760.

Datum if other than WGS84: NAD83 (enter coordinates to 6 decimal places.)

1. Latitude: -82.813499 Longitude: 41.654213
2. Latitude: -82.809440 Longitude: 41.655990

- | | |
|-------------------------|----------------------|
| 3. Latitude: -82.809440 | Longitude: 41.654572 |
| 4. Latitude: -82.811792 | Longitude: 41.652826 |
| 5. Latitude: -82.813501 | Longitude: 41.652896 |

A NPS contractor is preparing an update of the 1994 cultural landscape report (CLR) for Perry's Victory and International Peace Memorial by providing at least two alternatives for a revised treatment plan, accompanied by an environmental assessment to meet requirements for federal environmental policy compliance. The existing CLR was completed prior to approval of CLR standards and lacks sufficient direction for moving forward with intentional design additions and management of the landscape. The park has accrued features based on various types of planning decisions during the twentieth century. Guidance for preservation, removal, or rehabilitation of features within the park boundaries is needed and essential for the development of comprehensive treatment plan alternatives that encompass the entire designed landscape of PEVI (see attached project boundary map).

This letter serves as notification that we have begun the National Environmental Policy Act (NEPA) process and are proposing to have an Environmental Assessment (EA) available for public and regulatory review later this year. In addition, this letter serves as a record that the NPS is initiating informal consultation with your agency pursuant to Section 7 of the Endangered Species Act of 1973, that requires that a federal agency consult with the U.S. Fish and Wildlife Service or the National Marine Fisheries Service on any action that may affect endangered or threatened species or candidate species or that may result in adverse modification of critical habitat. The compliance process requires we request information concerning federal and state rare, threatened, and endangered species documented or reasonably suspected within 0.5 miles of the project site, which is depicted on the enclosed USGS Quadrangle. The project team reviewed the most current list of federally listed species that may occur in Ottawa County, Ohio.

The USFWS Ohio Field Office website identifies the following species as potentially present in Ottawa County, Ohio:

<u>Species</u>	<u>Federal Status</u>
Indiana Bat (<i>Myotis sodalis</i>)	(E)
Northern Long-eared Bat (<i>Myotis septentrionalis</i>)	(T)
Kirtland's Warbler (<i>Setophaga kirtlandii</i>)	(E)
Piping Plover (<i>Charadrius melodus</i>)	(E)
Eastern Prairie Fringed Orchid (<i>Platanthera leucophaea</i>)	(T)
Lakeside Daisy (<i>Tetraneuris herbacea</i>)	(T)
Rufa Red Knot (<i>Calidris canutus rufa</i>)	(T)
Eastern Massasauga (<i>Sistrurus catenatus</i>)	(PT)
Lake Erie Watersnake (<i>Nerodia sipedon insularum</i>)	(SC)
Bald Eagle (<i>Haliaeetus leucocephalus</i>)	(SC)

Important Note: This list reflects data available as of October 2015, and will change as new data becomes available.

E = Endangered	SC = Species of Concern
T = Threatened	CH = Critical Habitat
C = Candidate	P = Proposed (T/T/CH)

We would appreciate it if you would confirm the list of species to be addressed in the Cultural Landscape Treatment Plan/Environmental Assessment. Also, should you know of or come across any other resource constraint that may be a possible planning issue, please do not hesitate to contact us. We anticipate no significant environmental impacts associated with the project and look forward to receiving any guidance or comments you may have regarding the process or the project itself. Once prepared, we will provide you with a draft of the Treatment Plan/Environmental Assessment with preliminary effects determination and proposed mitigation, if any, for your review and concurrence.

Thank you for helping in this matter, and if you need any additional information or should you have any questions regarding this request, please feel free to contact me at (419) 285-2184 ext. 1225 or in writing at Perry's Victory and International Peace Memorial, 93 Delaware Avenue, P.O. Box 549, Put-in-Bay, OH 43456-0549.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara Fearon".

Barbara Fearon
Superintendent

Enclosure

cc: Jane Jacobs, CHG

United States Department of the Interior

FISH AND WILDLIFE SERVICE



Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994
February 21, 2017

Ms. Barbara Fearon
Superintendent
Perry's Victory and International Peace Memorial
93 Delaware Ave.,
P.O. Box 549
Put-in-Bay, OH 43456-0549

FAHLS# 03E15000-2017-TA-0803

Re: Cultural Landscape Treatment Plan and Environmental Assessment, Perry's Victory and International Peace Memorial

Dear Ms. Fearon,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

SPECIES OF CONCERN COMMENTS: The project lies within the range of the monarch butterfly (*Danaus plexippus plexippus*). The U.S. Fish and Wildlife Service (Service) has determined that listing under the ESA may be warranted and is currently conducting a status review of the monarch. Monarch butterflies are found throughout Ohio and some populations migrate vast distances across multiple generations each year. The Lake Erie islands provide important migration and stopover habitat for monarchs as they fly between the U.S., Mexico and Canada – a journey of over 3,000 miles. This journey has become more perilous for many monarchs because of threats along their migratory paths and on their breeding and wintering grounds. Monarch populations have declined significantly in recent years. Threats include habitat loss – particularly the loss of milkweed, the monarch caterpillar's sole food source – and mortality resulting from pesticide use.

Habitat within the project area is primarily composed of manicured lawn. The Service suggests that the Cultural Landscape Treatment Plan incorporate species of nectar-producing plants and milkweed endemic to the area where the mix is applied to benefit monarchs and other pollinators. The Service is partnering with groups across the state to identify and implement site-specific pollinator (including monarch) habitat restoration and management. We suggest that you contact Cody Grasser, 419-551-3875, cgrasser@pheasantsforever.org, who has expertise in planning and implementing pollinator habitat projects in northwest Ohio.

The project lies within the range of the **Lake Erie Watersnake** (*Nerodia sipedon insularum*), a state endangered species, and a Federal species of concern that was recently removed from the Federal list of Endangered and Threatened Wildlife and Plants due to recovery. The Watersnake is found on the offshore islands and in adjacent waters of Lake Erie. Watersnake summer habitat consists mainly of rocky shorelines with adjacent vegetation and shoreline structures such as crib docks. Winter hibernation habitat for the watersnake includes the island interior and the shoreline/vegetation interface. Currently the shoreline adjacent to the Perry's Victory and International Peace Memorial is primarily composed of a concrete seawall with some rock protection. Because of the vertical nature of the structure and the impact of wave scour, this area likely provides marginal summer habitat for Lake Erie Watersnakes. Summer habitat for Lake Erie Watersnakes could be improved by allowing vegetation to grow along the shoreline and incorporating more rock features close to the shoreline.

In order to avoid and minimize any impacts to the Lake Erie Watersnake and its habitat we recommend that any excavation or ground disturbance be completed between April 16 and October 14, and only then when the air temperature is above 60 degrees Fahrenheit for five consecutive days prior to excavation and on the day of excavation. These warm season temperatures allow the snakes to be warm enough to move out of harm's way if encountered during construction. If any Lake Erie Watersnakes are observed within the project area during construction they should not be harmed--intentional killing of Lake Erie Watersnakes is prohibited by state law. Further, we recommend implementation of the Service's Lake Erie Watersnake Post-Delisting Guidelines for Construction, Development, and Land Management (attached).

FEDERALLY LISTED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats 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 ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), 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. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

Should the proposed site contain trees ≥ 3 inches dbh, we recommend that trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or

abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend that removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is being recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleeb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, summer surveys may be conducted to document the presence or probable absence of Indiana bats within the project area during the summer. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid federal permit. Please note that summer surveys may only be conducted between June 1 and August 15.

The proposed project lies within the range of the **Kirtland's warbler** (*Setophaga kirtlandii*), a federally listed endangered species. The Kirtland's warbler is a small blue-gray songbird with a bright yellow breast. This species migrates through Ohio in the spring and fall, traveling between its breeding grounds in Michigan, Wisconsin, and Ontario and its wintering grounds in the Bahamas. While migration occurs in a broad front across the entire state, approximately half of all observations in Ohio have occurred within 3 miles of the shoreline of Lake Erie. During migration, individual birds usually forage in shrub/scrub or forested habitat and may stay in one area for a few days. If clearing of suitable habitat cannot be avoided, to preclude adverse effects to migrating Kirtland's warblers, clearing within 3 miles of the shoreline of Lake Erie should not occur from April 22nd – June 1st, or from August 15th – October 15th.

No tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the National Park Service, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat, northern long-eared bat, and Kirtland's warbler, for our review and concurrence.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state

lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at john.kessler@dnr.state.oh.us.

If you have questions, or if we can be of further assistance in this matter, please contact Biologist Megan Seymour at (614) 416-8993 ext. 16 or Megan_Seymour@fws.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Everson", followed by a horizontal line.

Dan Everson
Field Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW
Cody Grasser, Pheasants Forever, cgrasser@pheasantsforever.org

Attachment: Lake Erie Watersnake Post-Delisting Guidelines for Construction, Development, and Land Management



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Rd., Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994

Lake Erie Watersnake Post-Delisting Guidelines for Construction, Development, and Land Management August 2011

The Lake Erie Watersnake (*Nerodia sipedon insularum*) was listed as "threatened" under the Endangered Species Act in 1999, but in August of 2011 was removed from the list due to recovery. Lake Erie Watersnake populations will continue to be monitored for 5 years to ensure the population persists at a stable level. The U.S. Fish and Wildlife Service (Service) has developed the following voluntary guidelines to assist island landowners in avoiding and minimizing impacts to Lake Erie Watersnakes during typical land management and construction activities. The Service strongly encourages island residents to follow these guidelines to protect watersnake habitat, ensure population persistence, and prevent re-listing of the subspecies. *Intentional killing of Lake Erie Watersnakes is still prohibited by State law.*

The Lake Erie Watersnake occurs on the islands in the western basin of Lake Erie. Summer habitat includes cliffs with crevices, rocky shorelines, and rock-filled structures such as docks, breakwalls, and shoreline erosion control structures. Lake Erie Watersnakes forage in Lake Erie for small fish, primarily round goby. Suitable winter hibernation sites include cracks and crevices in bedrock, rocky soils, animal burrows, tree root masses, and human-made structures such as foundations, drainage tiles, and building pads.

Shoreline Management

The island shoreline including areas adjacent to interior island ponds, inlets, bays, and marinas, are important habitat for Lake Erie Watersnakes as well as native birds, fish, amphibians, and mammals. Shoreline vegetation also helps to stabilize banks, prevent erosion, and promote water quality. Landowners are encouraged to avoid mowing within 69 feet (21 m) of the shoreline to protect these important habitat and water quality functions.

If shoreline mowing is necessary, mowing between April 15 and September 15 should be completed at dusk, when watersnakes will have taken cover for the night. Mowers should utilize a high setting, and the area to be mowed should be actively monitored for watersnakes. If Lake Erie Watersnakes are encountered during mowing, activities can cease until the snake has left the area on its own, or the snake can be removed to a location outside of the mowing area and near the shoreline.

Excavation or removal of shrubs, standing or downed trees, root masses, animal burrows, piled rocks, cliffs, or bedrock within 69 feet (21 m) of the shoreline, ponds, inlets, bays, and marinas should be avoided. If necessary, excavation of these features should only occur after April 15 and before October 15, when temperatures are above 60 degrees Fahrenheit. Within 69 feet (21 m) of shore, heavy machinery should be limited to paved areas so as not to harm watersnakes that may have retreated under rocks, logs, and other material.

The Service encourages preservation and construction of shoreline structures with designs beneficial to watersnakes. These include timber or steel crib docks and riprap erosion control structures instead

of concrete or sheet steel. Any project that will impact the shoreline or waters of Lake Erie **must** be coordinated with the Buffalo District of the U.S. Army Corps of Engineers (Corps) to ensure compliance with the Clean Water Act. The Corps can be contacted at (716) 879-4330.

Excavation

During hibernation, Lake Erie Watersnakes are unable to move and are vulnerable to any disturbance of their hibernation sites. Excavation of any kind in potential suitable winter hibernation habitat within 528 ft (161 m) of shore should be avoided between October 15 and April 15. Activities to be avoided include, but are not limited to, digging foundations, burying utility lines, removing tree roots or hollow tree bases, and destroying human-made structures such as foundations or drainage tiles.

Excavation activities occurring between April 16 and May 31, or between September 15 and October 14 should only be conducted when air temperatures are above 60 degrees Fahrenheit. The area should be actively monitored for snakes before and during excavation and any watersnakes found should be carefully removed to a location outside of the construction area and near the shoreline.

Any holes or trenches that are dug should be filled in as soon as possible to prevent watersnakes from inadvertently falling into them and becoming trapped. Holes or trenches should be inspected for Lake Erie Watersnakes before being filled.

Erosion Control

Mesh or woven erosion control fabrics or blankets should **NOT** be used to stabilize disturbed areas, as they have been document to entangle and kill Lake Erie Watersnakes and other snake species. Loose straw or mulch can be used as an alternative.

Tree Removal

Tree root masses may provide suitable hibernation habitat for the Lake Erie Watersnake. If you plan to remove trees on your property, the Service recommends that only the above-ground portion of the tree be removed. The root mass should be left underground.

Summary of habitat management practices, timing, and location where applicable.

Time	Location	Recommendation
Oct 15-April 15	Within 528 feet (161 m) of shore	No Excavation.
April 16-May 31	Within 528 feet (161 m) of shore	Excavation only when temperature above 60° F. Mow at dusk, on high setting.
June 1-Sept 14	Within 69 feet (21 m) of shore	Mow at dusk, on high setting.
Sept 15-Oct 14	Within 528 feet (161 m) of shore	Excavation only when temperature above 60° F. Mow at dusk, on high setting.

Further Information

The Service is available to provide technical assistance regarding the Lake Erie Watersnake, proposed development projects, and land management activities. Questions should be directed to the Service at (614)416-8993. Additional information about the Lake Erie Watersnake is also available at our website: http://www.fws.gov/midwest/Ohio/endangered_LEWS.html and at www.RespectTheSnake.com.



Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

Office of Real Estate
Paul R. Baldridge, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

May 3, 2018

Barbara Fearon
Perry's Victory and International Peace Memorial
93 Delaware Ave.
P.O. Box 549
Put-In-Bay, Ohio 43456

Re: 18-482; Perry's Victory and International Peace Memorial - EA

Project: The proposed project involves landscape and accessibility improvements to the Memorial to enhance visitor enjoyment and experience.

Location: The proposed project is located in Put-In-Bay Township, Ottawa County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following records within a one-mile radius of the project area.

Harebell (*Campanula rotundifolia*), T
Ovate spike-rush (*Eleocharis ovata*), E
Flat-stemmed pondweed (*Potamogeton zosteriformis*), T
Lake sturgeon (*Acipenser fulvescens*), E, FSC
Muskellunge (*Esox masquinongy*), SC
Purple wartyback (*Cyclonaias tuberculata*), SC
Threehorn wartyback (*Obliquaria reflexa*), T
Kidneyshell (*Ptychobranhus fasciolaris*), SC
Deertoe (*Truncilla truncata*), SC
Bald eagle (*Haliaeetus leucocephalus*), FSC
Lake Erie watersnake (*Nerodia sipedon insularum*), T, FSC
Eastern foxsnake (*Pantherophis gloydi*), SC
Melanistic garter snake (*Thamnophis sirtalis sirtalis*), SC
Cave or cavern
Glacial striations & grooves
Natural bridge or arch

South Bass Island State Park – ODNR Division of Parks & Watercraft
Middle Bass Island State Park – ODNR Division of Parks & Watercraft
Scheeff East Point Nature Preserve – Put-in-Bay Township Park District
Massie Cliffside Preserve – Put-in-Bay Township Park District
Dodge Woods Preserve – Put-in-Bay Township Park District

The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; A = species recently added to state inventory, status not yet determined; X = presumed extirpated in Ohio; FE = federal endangered, FT = federal threatened, FSC = federal species of concern, FC = federal candidate species.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniata*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

The project is within the range of the eastern pondmussel (*Ligumia nasuta*), a state endangered mussel, the threehorn wartyback (*Obliquaria reflexa*), a state threatened mussel, the black sandshell (*Ligumia recta*), a state threatened mussel, and the fawnsfoot (*Truncilla donaciformis*),

a state threatened mussel. Due to the location, and that there is no in-water work proposed, this project is not likely to impact these species.

The project is within the range of the western banded killifish (*Fundulus diaphanus menona*), a state endangered fish, the pugnose minnow (*Opsopoeodus emiliae*), a state endangered fish, the lake sturgeon (*Acipenser fulvescens*), a state endangered fish, the spotted gar (*Lepisosteus oculatus*), a state endangered fish, and the channel darter (*Percina copelandi*), a state threatened fish. Due to the location, and that there is no in-water work proposed, this project is not likely to impact these species.

The project is within the range of the Lake Erie water snake (*Nerodia sipedon insularum*), a state threatened species and federal species of concern. Hibernation habitat for this species includes suitable tree roots or hollow tree bases and human-made structures such as walls. If project construction is within 226 feet of the shoreline, excavation activity should not occur during the hibernation season of October 15 to April 15 or when the air temperature is below 60° Fahrenheit. Excavation of any kind should be completed only when both air and ground temperatures are above 60° Fahrenheit on the day of work and for five consecutive days prior to the day of work. Construction activities including shoreline rip-rap placement should also not occur during the hibernation season of October 15 to April 15 or when the air temperature is below 60° Fahrenheit. Heavy machinery should be limited to existing roads, ramps, or areas with little or no likelihood of supporting snakes. If the project requires removal of trees >6" dbh that are within the 226 foot zone, only the above-ground portion of the tree should be removed. The root mass should be left underground so as not to disturb hibernation locations. Rock-filled timber or steel crib docks and rip-rap shoreline protection should be used rather than sheet steel.

Any holes or trenches that are dug should be filled in as soon as possible to prevent water snakes from inadvertently falling into them and becoming trapped. Holes or trenches should be inspected for Lake Erie water snakes prior to being filled. Monitoring should be conducted before and during construction by an individual trained to identify Lake Erie water snakes. The site should be walked daily prior to any earthmoving activity to ensure no water snakes are within the work area. If Lake Erie water snakes are encountered during winter excavation, operations should cease immediately, and the monitoring individual should contact Nathan Reardon, DOW Compliance Coordinator at 614-265-6741, and the U. S. Fish and Wildlife Service's Columbus, Ohio Field Office at 614-416-8993. If the project does not contain suitable hibernation habitat (e.g., locations composed purely of topsoil covered by short grasses and forbs with no cracks or crevices present), ground disturbing activities during the hibernation period (October 15 to April 15) are not likely to impact the species.

The project is within the range of the Blanding's turtle (*Emydoidea blandingii*), a state threatened species. This species inhabits marshes, ponds, lakes, streams, wet meadows, and swampy forests. Although essentially aquatic, the Blanding's turtle will travel over land as it moves from one wetland to the next. Due to the location, the type of habitat present at the project site, and within the vicinity of the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and a federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. Due to the location, the type of habitat present at the project site and within the vicinity of the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the Kirtland's warbler (*Setophaga kirtlandii*), a state endangered and federally endangered bird. This species migrates through Ohio in the spring and fall, traveling between its breeding grounds in Michigan, Wisconsin, and Ontario and its wintering grounds in the Bahamas. While migration occurs in a broad front across the entire state, approximately half of all observations in Ohio have occurred within 3 miles of the Lake Erie shoreline. Migrating birds usually forage in forested or shrub/scrub habitat and may stay in one area for several days. Because so much of the southern Lake Erie shoreline is already developed, and stopover habitat is already so fragmented, the DOW recommends that this stopover habitat, (i.e. forested or shrub/scrub area), within three miles of the shoreline be preserved whenever possible. If clearing of suitable habitat cannot be avoided, to preclude adverse effects to Kirtland's warblers, clearing within 3 miles of the Lake Erie shoreline should be avoided from April 22nd through June 1st, and from August 15th through October 15th.

The project is within the range of the piping plover (*Charadrius melodus*), a state endangered and federally endangered bird. This species does not nest in the state but does utilize stopover habitat as it migrates through the region. Due to the location, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. Due to the location, the type of habitat present at the project site, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the cattle egret (*Bubulcus ibis*), a state endangered bird. Cattle egrets are not strictly wetland birds. They often forage in dry pastures and fields. Egrets nest in colonies and will build a nest out of sticks and other materials wherever it can be supported. Due to the location, the type of habitat present at the project site, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the black tern (*Chlidonias niger*), a state endangered bird. The black tern prefers large, undisturbed inland marshes with fairly dense vegetation and pockets of open water. They nest in various kinds of marsh vegetation but cattail marshes are generally favored. Nests are built on top of muskrat houses or on top of floating vegetation. Due to the location, the type of habitat present at the project site, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the common tern (*Sterna hirundo*), a state endangered bird. The preferred nesting sites of common terns are natural or man-made islands that are free of mammalian predators and human disturbance. They will also utilize mainland beaches and dredge disposal areas but only when islands are unavailable. The common tern nests in colonies. Their eggs are laid in a grass-lined depression in the sand. Due to the location, the type of habitat present at the project site, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the king rail (*Rallus elegans*), a state endangered bird. Nests for this species are deep bowls constructed out of grass and usually hidden very well in marsh vegetation. Due to the location, the type of habitat present at the project site, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus cyaneus*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. Due to the location, the type of habitat present at the project site, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). Due to the location, the type of habitat present at the project site, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the snowy egret (*Egretta thula*), a state endangered species. Snowy egrets are only being found reliably in the western Lake Erie marshes. This small egret almost invariably nests in mixed heronries. Within their breeding colonies, snowy egrets normally place their nests in the middle levels of vegetation at heights of 3-10 feet. Due to the location, the type of habitat present at the project site, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the black bear (*Ursus americanus*), a state endangered species. Due to the mobility of this species, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

Water Resources: The Division of Water Resources has the following comments.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact John Kessler at (614) 265-6621 if you have questions about these comments or need additional information.

John Kessler
ODNR Office of Real Estate
2045 Morse Road, Building E-2
Columbus, Ohio 43229-6693
John.Kessler@dnr.state.oh.us



May 15, 2018

In reply, please refer to:
2012018-OTT-41563

Barbara Fearon, Superintendent
NPS- PEVI
93 Delaware Avenue
Put-in-Bay, Ohio 43456-0549

Dear Ms. Fearon:

Re: Draft Cultural Landscape Treatment Plan/Environmental Assessment
Perry's Victory & International Peace Memorial, Ottawa County, Ohio

This letter is in response to your correspondence, received on March 28, 2018. We also discussed this plan with you on April 26, then also discussed it with Bill Harlow and Marla McEnaney on May 4, 2018. You also provided us with a PDF copy of the 1994 Cultural Landscape Report for this property, which is the foundation document that the current plan seeks to update in part. Our comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800, "Protection of Historic Properties".

We have reviewed the information submitted describing the proposed project alternatives and their potential effects to historic properties. It is our understanding that no projects are currently being proposed for implementation. We also understand that the Environmental Assessment language included with this plan was not intended as a substitution of NEPA process steps for a standard Section 106 review of any future projects that may be implemented in accordance with the plan's recommendations. We offer the following general comments to follow up on our discussions:

1. We recommend that a PDF or paper copy of the 1994 Cultural Landscape Report should be included with this plan for reference, since it is meant to be a complementary piece to that foundation document. We also recommend that PDF or larger scale versions of any available historic site plans or elevations of hardscape features by Freedlander should be similarly included with this plan.
2. Given our experience with recent development of non-NPS property in view of the Memorial, we recommend more detailed descriptions and figures should be included in this plan so as to fully document the views and vistas both to and from the Memorial. We fully anticipate a continuing need for considering view shed impacts as part of reviews that are not controlled by NPS and it's our opinion that this document can be enhanced so that the critical views and vistas are more clearly identified for planning and

view shed evaluation purposes. For instance, Page 3-8/Line 20 suggests that only the view from the north and Gibraltar Island are significant, which is clearly not the case. You might consider some discussion of distances within which key views should be closely evaluated or height discussions for close review of new development on the island. For the subsequent discussion at Page 3-15 and elsewhere, it may be worthwhile to draw distinctions between external and internal views (or off land vs. on island views). This would support the alternative discussion later in the plan about establishing view corridors for visitors from the Visitor's Center approach.

3. Page 3-4: Treatment Guidelines should include a clear statement about consideration of Memorial's relationship to neighboring property owners in making treatment decisions as well as views of local community and historic groups.
4. Page 3-6: Vegetation management would be enhanced by adding maintenance needs and life span projections for replacement species.
5. Page 3-7: New Design and Construction needs to clearly state where "Documentation" will be maintained as records- our assumption is that they would be retained both at PEVI and elsewhere within NPS.
6. Figure 3-24 shows an existing monument on site that is proposed for relocation. We recommend that a more detailed section about the limits on display of monuments and memorials would supplement existing policies and make it clear that such objects should be avoided on site.
7. Page 3-19: Views and Vistas mentions the possible creation of an observation point. Please provide a map or figure that shows the possible location.
8. Page 3-21: Concept Alternatives
We do not support the curvilinear paths approach in Concept A, as it does not fall within the original design intent of the Freedlander plans. We do support the addition of paths and walkways that were part of the original plan, but never executed, as proposed in Concept B. In general, effects on historic properties would be less should the treatment recommendations follow the description found in Concept B.
9. Chapter 4: Environmental Assessment was somewhat difficult to follow, but we recognize that for most future actions under the Alternatives, NPS will consult with SHPO and other consulting parties with the expectation that it may be necessary to resolve adverse effects related to new construction not in keeping with the Freedlander plan.
10. We recommend that before any field investigations are considered, NPS should consult with SHPO about how to plan for the appropriate level of effort for the identification of archaeological resources.

May 15, 2018
Barbara Fearon
Page 3

11. Finally- for Alternative 3, currently being evaluated as the likely preferred alternative, we remind NPS that according to guidance from the Advisory Council on Historic Preservation, it is not appropriate to issue a FONSI for the EA until we have resolved adverse effects.

If you have any questions about this letter or our review of this document, please call me or Nathan Young at (614) 298-2000. We appreciate the opportunity to review this draft plan and look forward to continuing discussions about future projects that may be proposed as the final plan is implemented.

Sincerely,



Lisa Adkins, Architecture Reviews Mgr.
Dept. of Resource Protection and Review

Cc: Christopher Wilson, ACHP

RPR Serno: 1073201



September 19, 2018

In reply, please refer to:
2012018-OTT-41563

Barbara Fearon, Superintendent
NPS- PEVI
93 Delaware Avenue
Put-in-Bay, Ohio 43456-0549



Dear Ms. Fearon:

Re: Draft Cultural Landscape Treatment Plan/Environmental Assessment
Perry's Victory & International Peace Memorial (PEVI), Ottawa County, Ohio

This letter is in response to your correspondence, received on August 9, 2018. We also discussed this plan with you and Marla McEnaney on July 18, 2018, as well as a consultant representing the Plan contractor CHG. Our comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800, "Protection of Historic Properties".

We appreciate the additional information that was provided about the timing of eight small projects that are related to visitor experience related landscape projects, all of which are currently in planning stages. We have no objection to consultation for these small projects being concluded through the use of the existing service-wide Programmatic Agreement.

More complex projects that require more detailed design consultation, such as the creation of new ramps and alterations to the historic stair configuration, are likely to need additional study in the next 5 to 10 years. We agree that there are valid concerns about adverse effects resulting from removal of historic design features and the addition of modern accessibility improvements. Since the stair/accessibility project is not currently scheduled for implementation, we recognize that future consultation involving staff from PEVI, NPS regional office and the Denver Service Center will be necessary before that project can advance.

With the understanding that future consultation will necessary to ensure that the stair/accessibility improvements will follow the *Standards for Rehabilitation*, we agree with your determination that the preferred Alternative B from the draft Plan is not likely to have adverse effects on the historic memorial and its designed landscape. Please let us know when you would like to have our participation in discussions about the stair/accessibility project.

If you have any questions about this letter or our review of this document, please call me at (614) 298-2000 or ladkins@ohiohistory.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa Adkins".

Lisa Adkins, Architecture Reviews Mgr.
Dept. of Resource Protection and Review

Appendix C

Perry's Victory and International Peace Memorial

Comparative Analysis: Memorial Design



Perry's Victory and International Peace Memorial

Comparative Analysis: Memorial Design



Perry's Victory and International Peace Memorial

Put-in-Bay, Ohio

Comparative Analysis: Memorial Design

August 2017

Prepared by:

Wiss, Janney, Elstner Associates, Inc.
330 Pfingsten Road
Northbrook, Illinois 60062

Under contract to:

Commonwealth Heritage Group, Inc.
300 West Main Street, Suite 201
Charlottesville, Virginia 22903

Prepared for:

National Park Service
Midwest Regional Office
601 Riverfront Drive
Omaha, Nebraska 68102



**National Park Service
Midwest Regional Office
601 Riverfront Drive
Omaha, Nebraska 68102
(402) 661-1736**

This manuscript has been authored by Wiss, Janney, Elstner Associates, Inc., as subconsultant to Commonwealth Heritage Group, Inc., under Contract Number P14PC00448 with the National Park Service. The United States Government retains and the publisher, by accepting the article for publication, acknowledges that the United States Government retains a non-exclusive, paid-up, irrevocable, world-wide license to publish or reproduce the published form of this manuscript, or allow others to do so, for United States Government purposes.

Cover image: From the Commission of Fine Arts, *Message from the President of the United States transmitting the Report of the Commission of Fine Arts for the fiscal year ended June 30, 1912.*

Perry's Victory and International Peace Memorial

Put-in-Bay, Ohio

Comparative Analysis: Memorial Design

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Introduction

This comparative analysis was prepared by Wiss, Janney, Elstner Associates, Inc. (WJE), to support the preparation of a Cultural Landscape Treatment Plan and Environmental Assessment for Perry's Victory and International Peace Memorial currently in preparation by Commonwealth Heritage Group, Inc. (Commonwealth). The focus of the comparative analysis is to review the Cultural Landscape Report completed in 1994, the National Register of Historic Places nomination (1978) and Additional Documentation (2014) for Perry's Victory and International Peace Memorial, as well as other pertinent secondary sources on the Beaux Arts Movement, to determine the design context for the Perry's Victory Memorial (Figure 1).

Other monuments identified as appropriate for discussion within this context and for comparison to Perry's Victory Memorial include Brock's Monument in Queenston, Ontario, and the Prison Ship Martyrs Monument in Brooklyn, New York, which are addressed herein to identify similarities or differences in design inspiration and execution. These and other urban memorials, such as Nelson's Column in Trafalgar Square in London, England, are reviewed to understand the transition from classical motifs, such as obelisk, to the use of the column for Perry's Victory Memorial. In addition, the monuments and memorials reviewed as part of the design context have also been researched to identify any modifications made to address universal accessibility issues or issues related to paving materials.

Information gathered through this analysis is being used to inform development of the Cultural Landscape Treatment Plan and Environmental Assessment, which address compatible changes to the landscape of the memorial.



Figure 1. Perry's Victory Memorial, circa 1925. Photographer, F. H. Haskett, Columbus, Ohio. (Source: PEVI archives, file 17-3-21, PEVI-MON)

The National Register nomination Additional Documentation for Perry's Victory and International Peace Memorial indicates that the memorial is nationally significant under Criterion A in the area of Social History as "the result of the social movements of the late nineteenth and early twentieth centuries aimed at commemorating heroic events of the past." In addition, the memorial is nationally significant under this criterion in the area of the Politics/Government for the involvement of the U.S. government in construction and maintenance of the site. Of particular note is that the architectural design competition for the memorial was the first to be judged by the newly created United States Commission of Fine Arts, "setting a precedent for that organization to judge architectural design competitions for other national commemorative properties, including the Lincoln Memorial."¹ The nomination documentation notes that Perry's Victory and International Peace Memorial is

1. Deborah E. Harvey, MHP, Outside the Box, LLC, Richmond, Virginia, *National Register nomination for Perry's Victory and International Peace Memorial (Additional Documentation)*, September 8, 2014, Section 8, 53–56. Unlike the 1978 nomination, which found the memorial significant under

Criterion A in that it commemorates a critical victory in the Battle of Lake Erie, the 2014 Additional Documentation finds that the memorial does not meet Criterion A in the Military Area of significance due to changes in how this criterion is assessed (i.e., lack of countable resources directly associated with

significant under Criterion C in the areas of Architecture and Engineering:

... because it is an excellent and intact example of the Beaux Arts style of architecture and landscape architecture popularized by the “White City” of the Chicago World’s Fair in 1883, it employed innovative engineering construction techniques that excited the interest of professional engineers of the time, and it is the work of a master, Joseph H. Freedlander, one of the two associated architects to design the Memorial Column and its plazas and the architect of its landscape design.²

The nomination documentation further notes that the memorial is:

... significant as a fine example of the Beaux Arts style of architecture and planning popular in the United States between approximately 1870 and 1930, including the harmony of the architectural style of the building with the design and landscaping of the grounds.³

The design by noted architect Joseph Freedlander, “already a well-known and highly regarded master of his profession,” in association with his junior partner Alexander Duncan Seymour, who would go on to produce significant works independently, contributes to the significance of the memorial under Criterion C.⁴ Finally, the nomination documentation indicates that the memorial is significant under this criterion in the area of Engineering as “... the largest freestanding Doric column ever built, a feat which attracted considerable attention in the periodicals of the time.”⁵

The National Register Additional Documentation also finds that the memorial meets Criteria Consideration F as a commemorative property “... due to its monumental and symbolic Beaux Arts design and its age.”⁶

WJE project team members Deborah Slaton and Tim Penich participated in the project start-up meeting and site visit and conducted research in park archives on October 5 and 6, 2016. Following the site visit, they conducted extensive research into the design history of the Memorial, as well as into the context of Beaux Arts architecture and examples including Brock’s Monument, the Prison Ship Martyrs Monument, Nelson’s Column, and other monuments relevant to this study and discussed below. In conjunction with development of the design analysis, WJE project team members contacted representatives of the entities responsible for the stewardship of the subject monuments to gather information on what modifications, if any, have been made to address universal access issues or problems with paving materials.

Establishment of the Memorial

Honoring the Battle of Lake Erie and Lasting Peace

Perry’s Victory and International Peace Memorial was established to honor those who fought in the Battle of Lake Erie during the War of 1812. The memorial also celebrates the long-lasting peace between Britain, Canada, and the United States, and the longest undefended border in the world.

Commodore Oliver Hazard Perry (1785–1819) was known as the hero of the Battle of Lake Erie, a turning point in the War of 1812. During fierce fighting, Perry’s flagship, the US Brig *Lawrence*, was incapacitated, but with four men he rowed the flagship’s cutter to the US Brig *Niagara*, transferring the ship’s flag with him. The flag carried the motto, “Dont [sic] Give up the Ship,” honoring the last command of Captain James Lawrence of the US Frigate *Chesapeake*, who died of wounds received in a battle with the British frigate HMS *Shannon* on June 1, 1813. Under

the battle). See also Thomas P. Busch, Historical Architect, National Park Service, *National Register nomination for Perry’s Victory and International Peace Memorial*, May 28, 1976, entered into the National Register, July 22, 1976.

2. Harvey, Section 8, 53–56.

3. Ibid.

4. Ibid.

5. Ibid.

6. Ibid.

Perry's command the American forces prevailed in the battle of September 10, 1813. At the conclusion of the battle, Perry wrote a message to General William Henry Harrison, who was waiting to advance with American forces into Canada: "Dear General: We have met the enemy and they are ours. Two ships, two brigs, one schooner and one sloop. Yours with great respect and esteem, O. H. Perry."

The Battle of Lake Erie proved decisive in the War of 1812, securing American control of Lake Erie. The British abandoned Fort Malden and retreated up the Thames River, where Harrison's army defeated the British forces and their American Indian and Native Canadian allies on October 5, 1813. As a result of these victories, the state of Ohio and the territory of Michigan remained part of the United States. Perry's victory helped achieve the commitment to peace and led to the signing in 1817 of the Rush-Bagot Agreement between the United States and Great Britain. Tenets of this agreement, an internationally significant treaty that called for disarmament on the Great Lakes, are still in effect today.⁷

The Memorial Competition

Interest in creating a memorial to Perry's victory began in the 1850s, with establishment of the Battle of Lake Erie Monument Association. On September 5, 1859, a cornerstone was laid for a monument to be erected on Gibraltar Island, but support for the memorial waned with the onset of the Civil War. In 1867, the Perry Monumental Association was formed, with South Bass Island suggested as the site for a monument. Funds were raised, but the project was not initiated. From 1890 to 1903, eleven separate bills were introduced in the U.S. Congress for the creation of a monument, but all were unsuccessful.

In 1907, with the approaching centennial of the battle, newspaper editor Webster P. Huntington became involved in the effort to construct a memorial. In June 1908, a resolution was passed in Ohio supporting a centennial celebration to occur from June to September 1913, and the Ohio Perry's Victory Centennial Commission was established with Huntington as a commissioner. Huntington enlisted the support of architect and civil engineer John Eisenmann, who prepared a concept drawing for a monument to be constructed on the isthmus connecting the two larger sections of South Bass Island.

In a meeting on September 10, 1910, the Interstate Board of Perry's Victory Centennial Commissioners was established. In addition to the members from Ohio, commissioners from Pennsylvania, New York, Michigan, Illinois, Wisconsin, Kentucky, Rhode Island, and New York were added; Minnesota also later joined the Inter-State Board.⁸ Massachusetts later appropriated funds toward the establishment of the memorial, although it did not make provisions for commissioners. And, although part of the commission, Minnesota did not appropriate funds toward the construction of the memorial.⁹

At the September 1910 meeting, Eisenmann presented his design for a memorial sited on the isthmus (Figure 2). It included an aquarium, lighthouse beacons, naval and weather observatories, and a wireless station, as well as fountains and viewing balconies. The design, which was unanimously adopted at the meeting, was presented to state legislatures to obtain funding. (Although Eisenmann submitted a revised version of his original design in the competition, his design—other than the selection of a location for the memorial—was eventually superseded by

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7. "The Battle of Lake Erie," National Park Service, Perry's Victory and International Peace Memorial web site, <http://www.nps.gov/pevil/>, accessed 2017.
 8. Alfred Mongin, *A Construction History of the PVIPM* (National Park Service, August 10, 1961), vol. 1, 46.

9. *Perry's Victory: First Annual Report of the Perry's Memorial Commission*, 67th Congress, 1st Session, Document No. 35, May 20, 1921 (Washington, D.C.: Government Printing Office, 1921), 91–93.

Freedlander and Seymour's winning entry in the design competition.)¹⁰

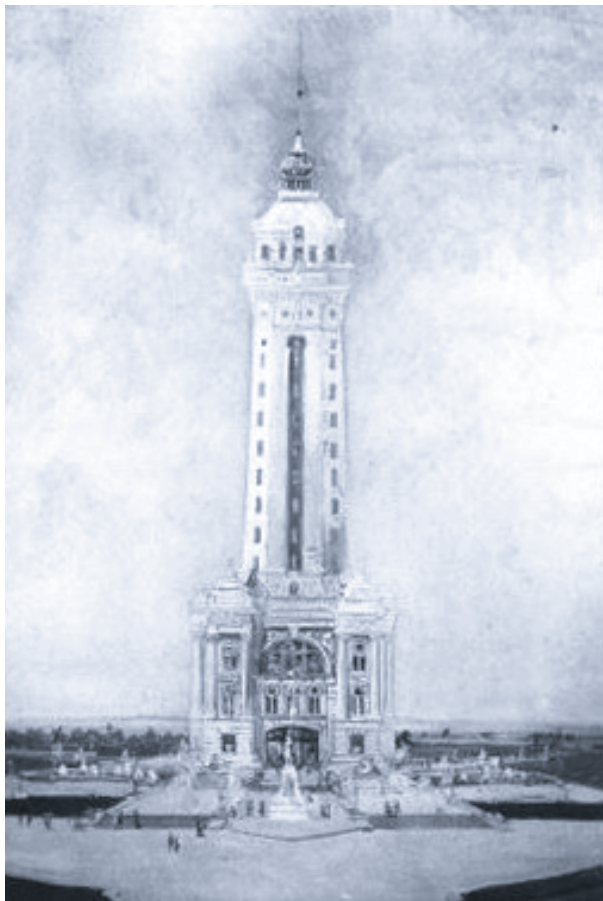


Figure 2. John Eisenmann's circa 1910 design for Perry's Victory Memorial. Source: Maryland Historical Society. (Source: Jeff Kissell, *Put-in-Bay: The Construction of Perry's Monument*)

The Inter-State Board sought additional funding from the federal government. With the passage of Public Law 463, signed March 3, 1911, a federal appropriation of \$250,000 was provided and three federally appointed commissioners were added to the board.¹¹ President William Howard Taft agreed to make funds available if the memorial design was chosen by means of a public competition, with the newly formed U.S. Fine Arts Commission to participate in the selection process.¹² The Fine Arts Commission had been

established in 1910 through passage of 40 US.C. 104, an Act to Establish a Commission of Fine Arts.¹³ The competition for the design of the Perry's Victory memorial was the first selection made by the Commission.

The importance and meaning of the monument was stressed in the commission's planning. For example, a December 1909 report of the commissioners noted:

The memorial "must be in the highest sense artistic and historically suggestive. It must have, by reason of these qualities, a peculiar educational influence upon future generations, proceeding from its singular individuality. Better no memorial than an inadequate or unworthy one. The motive that prompts our people to thus commemorate one of the most glorious events in our history and the Nation's subsequent progress of a hundred years must be as broad as the American Continent and as deep rooted as our inherent love of free institutions. Nothing less will suffice than a memorial truly national in character, taking rank among the worthiest of such structures in the world."¹⁴

In October 1911, the "Program of a Competition" to select an architectural design for a Perry Memorial was issued. While the program noted that the details of the design were left to the competitors, it did establish guidelines for the memorial and the concept of a column or "shaft" was derived directly from the stated criteria.

The Memorial will consist primarily of a shaft * of considerable height, bearing, as an aid to navigation, if the designer wishes to include it, a light of the first order. The shaft must have a stairway, an elevator and a convenient outlook for the public from a high level. . . .

There is also to be a Museum of Historic Relics, which should be a hall of fine proportions and of a floor area not less than three thousand square feet and not more than five thousand square feet. Suitable provision

10. In 1912, Eisenmann accepted an offer of \$1,500 for any claims against the memorial project. Mongin, vol. 2, 122.

11. Harvey, Section 8, 66.

12. Ibid.; "A Monument to Perry," National Park Service, Perry's Victory and International Peace Memorial web site, <http://www.nps.gov/pevi/>, accessed 2017.

13. Harvey, Section 8, 66.

14. Sturgis, citing report of Commissioners, 15.

should be made for lavatories and janitor's services, and for an office for the curator.

The Shaft and the Museum may be grouped, combined or separated in whatever way may appear best to the competitor.¹⁵

Regarding the setting for the memorial, the program noted:

It is intended that the reservation shall afford a suitable setting for the Memorial, but this does not mean that the whole area must be treated in a formal manner. A curving road runs along the western or bay shore. Its line may be changed, and it may be widened, but no part of the reservation or of the road may be shown as extending further into the bay or the lake than the present shore line. The bay and lake must be so connected as to provide for the convenient passage of boats of the life saving service. The earth excavated from such connection and any extensions of it may, if desired, be utilized in raising the level of the site, but competitors who desire to show the Memorial as rising directly from the water may do so. It is important that adequate circulation should be provided within the buildings and in the reservation generally.¹⁶

The budget for construction of the memorial was \$600,000, with an additional budget of \$100,000 for improvement of the grounds.¹⁷

The designs offered by architects in the competition for the Perry's Victory Memorial were based on the criteria established by the building committee. As noted in a commissioners' report issued after completion of the monument:

The fundamental provisions of the program of competition were determined by the building committee in accordance with the long-accepted views of commissioners as to the historical significance of the memorial. It was stipulated that all designs submitted in the competition should be for a memorial "intended to commemorate the victory of Commodore Oliver Hazard Perry and the officers and men under his command at the Battle of Lake Erie, and as a memorial to 100 years of peace between Great Britain and the United States;" that the chosen site, which was described in the program, should be

considered by all competitors; that the memorial should consist "primarily of a shaft," the latter term not being used in a technical sense nor as indicating a type of design; that secondary buildings might be included in the general design, at the discretion of the competitors; and that the competition should be anonymous.¹⁸

The competition received widespread response, with 147 architects and architectural firms applying for admission to the competition. In all, 83 entries were admitted and 54 completed proposals were received. The drawings were exhibited in the great hall of the National Museum in Washington, D.C.¹⁹

The detailed program, careful management, and high intrinsic values of the memorial all combined to encourage a wide response, and to make the competition itself highly significant. As noted in a contemporary publication:

The attractiveness of the theme, the official auspices under which the competition was to be conducted, and the assurance of the advice of the National Commission of Fine Arts in making the awards, resulted in the largest and most representative competition of architects ever held in this country, and the exhibits were pronounced by experts as exceeding in number and merit any gathered together for a like purpose in the world.²⁰

The design of architects Joseph H. Freedlander and Alexander D. Seymour, Jr., of New York City, was selected (Figure 3). Other awards went to James Gamble Rogers of New York (First Premium), Paul Cret of Philadelphia (Second Premium), and Dillon, McLellan, and Beadel of New York (Third Premium) (Figure 4 through Figure 6). The awards for the three premiums were \$1,250, \$1,000, and \$750; respectively, and the selected architect would receive for his services payment of 6 percent of the construction cost.²¹ The original design, submitted by John Eisenmann, was not selected but the designer received an award of \$1,500 from the Inter-State

15. Ibid.

16. Ibid.

17. Ibid.

18. Ibid., 16–17.

19. Ibid., 17.

20. Ibid.

21. Ibid., 94.

Board as compensation for the time and energy he devoted to the project.

Similar to the highly regarded competition, the selection of the designers was also very well received. The *Ohio Architect, Engineer and Builder* enthused:

The main point of this successful competition is that we are to have arising above these historic waters at Put-in-Bay a memorial . . . that will be in every way worthy not only of the naval achievement made possible by the courage of Commodore Oliver Hazard Perry and the spirit of 1812, but also worthy of the wonderful development of this, his, [sic] country in the hundred years of peace. . . .²²

22. "The Perry Memorial," *Ohio Architect, Engineer and Builder* 19, no. 1, November 1910, 62–64.



Figure 3. The accepted design for the Perry's Victory and International Peace Memorial by architects Joseph H. Freedlander and Alexander D. Seymour, Jr. (Source: PEVI archives)

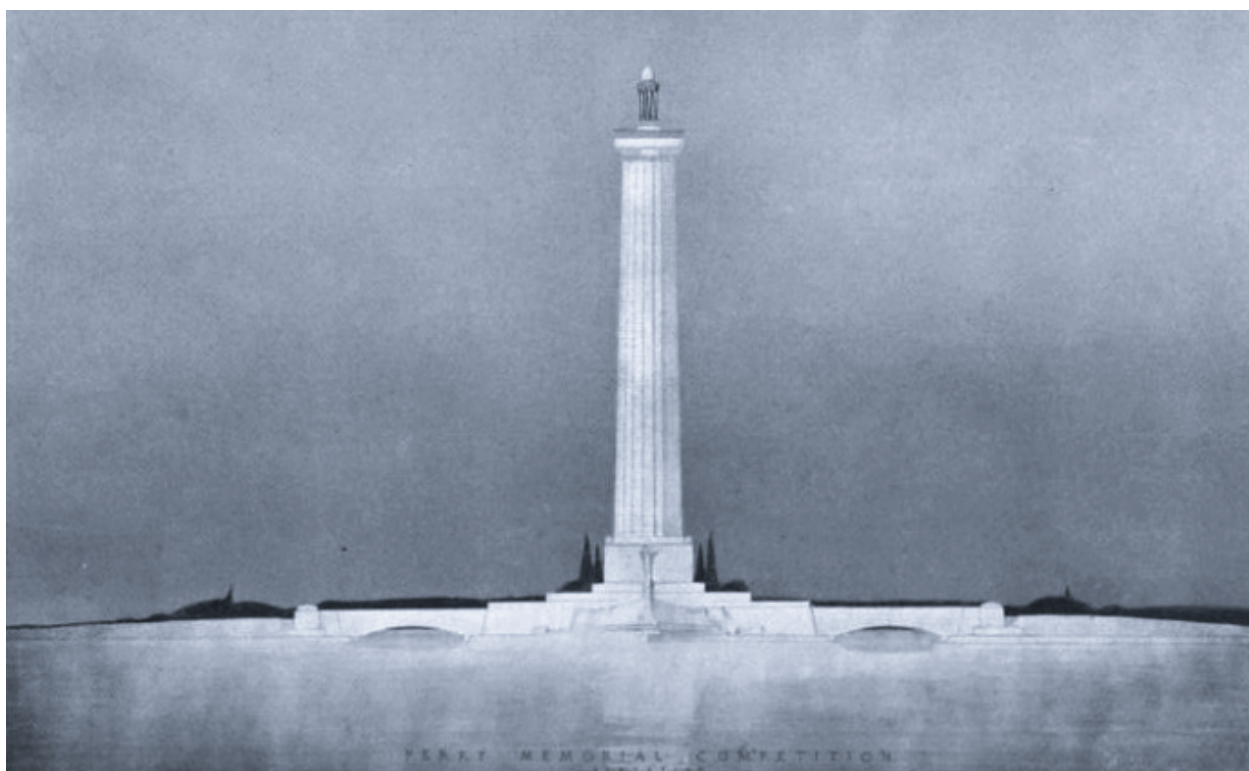


Figure 4. The design awarded First Premium for the Perry's Victory and International Peace Memorial by architect James Gamble Rogers. (Source: PEVI archives)



Figure 5. The design awarded Second Premium for the Perry's Victory and International Peace Memorial by architect Paul Cret. (Source: PEVI archives)



Figure 6. The design awarded Third Premium for the Perry's Victory and International Peace Memorial by architects and Dillon, McLellan, and Beadel. (Source: PEVI archives)

The Architects

Upon selection of Freedlander and Seymour as architects of the new memorial, the magazine *Ohio Architect, Engineer and Builder* stated, “The Perry Memorial Centennial Commission and the Fine Arts Commission of Washington . . . are certainly to be congratulated on the result of their competition.”²³ The journal noted that Freedlander graduated from the Massachusetts Institute of Technology and the Ecole des Beaux-Arts in Paris, and at the time of the competition was also the president of the American Group of the Société des Architectes Diplômés par le Gouvernement. The journal also noted Freedlander’s success as an architectural designer with both public and private commissions; examples of his work mentioned include the New York Importers and Traders National Bank, the New Harlem Hospital, and the Metropolitan Hospital for the city of New York. The National Home for Disabled Volunteer Soldiers in Johnson City, Tennessee (which included thirty-six buildings), as well as the St. Louis Club and Carnegie Library in Johnson City, are also examples of his work. Freedlander had been successful in several prior competitions. His practice continued to flourish after the design of the Perry’s Victory Memorial. For example, he was responsible for the design of the Museum of the City of New York in 1928, the Spa in Saratoga, New York in 1929, and the Bronx County Courthouse in 1934.

Freedlander’s co-designer, A. D. Seymour, Jr., also graduated from Columbia University, and studied at the American Academy in Rome and the Ecole des Beaux-Arts of Paris. *Ohio Architect, Engineer and Builder* noted that Seymour “. . . has traveled extensively in Europe, making numerous measured drawings of existing historical work and is a member of the Beaux Arts Society.”²⁴

Thus, Freedlander and Seymour’s educational background, especially at the Ecole des Beaux-Arts, interests, and prior designs all supported development of a Neoclassical solution to the

problem posed by the Perry’s Victory Memorial competition.

The Design

Architect Joseph Freedlander described the design of the Memorial in the official souvenir program given to those who attended the centennial ceremony in 1913:

THE PERRY MEMORIAL.

By JOSEPH HENRY FREEDLANDER,

The scheme of The Perry Memorial had its inception in a combination of remarkable historical events. It is a striking fact that England and America, two countries which have been at peace for a period of a hundred years, should purpose to definitely seal their friendship by means of a general treaty, the spirit of which shall insure to the English speaking races this final triumph of civilization. It has therefore seemed most fitting to embody in a Memorial commemoration of Perry’s victory at the battle of Lake Erie an expression of the treaty of arbitration about to be entered into between the two nations—an epoch-making event in the history of two great peoples of vast and significant moment.

Exactly one hundred years after the last war it is proposed to enter into an arbitration treaty designed to ensure everlasting peace. It was with this thought pregnant with good-will to mankind in mind that the Perry Memorial was conceived. Three elements in the composition immediately suggested themselves: the shaft, the Museum, and a statue flanked by a Colonnade, typifying peace by arbitration.

The composition was born in an instant—the shaft took the form of a great Doric column, with the Museum on the left and the Colonnade on the right. All were placed on a broad plaza elevated only slightly above the ground so that the entire Memorial would appear to rise from the sea and be further enhanced by its reflections in the rippling waters.

The Column stands alone so that it may be seen over the water from all points of the compass and by its very height dominate the surrounding country. The Museum and Colonnade are distant from it some three hundred feet and thus will not obscure its perspective at any point. On the contrary its

23. Ibid., 64.

24. Ibid.

setting as the central motive in the composition will ensure a degree of dignity impossible to obtain were the other buildings placed in close proximity. The Museum and Colonnade in turn are placed on terraces at a slightly higher elevation than the main platform so that they may give grace and variety to the vista and their architectural setting be assured.

In view of the location of the site in so great an expanse of water and the necessarily isolated character which these conditions imply, the Doric order treated without any ornament of any kind seemed best adapted to convey the impression of grandeur and simplicity which the Memorial is intended to suggest. The plan covers almost the entire site in length, and in width extends from the waters of Lake Erie to those of Put-in-Bay. Here it is reached by a broad flight of steps forming the main approach. The shore drive [Bayview Avenue] runs through it, thus making it accessible to visitors both by land and by sea. A landing stage for small boats is provided at the bottom of the flight of steps. Besides insuring an architectural base for the general composition the plaza is intended to serve for exercises and ceremonies requiring the accommodation of large assemblages. Its extreme length is seven hundred and fifty feet and its width on the main central axis is four hundred and fifty-eight feet. It is twelve feet above mean high water while the terraces immediately surrounding the Museum and the Colonnade are elevated three feet or more or fifteen feet above mean high water. The level of the roadway is elevated six feet above the water, and in turn another flight continues to the water's edge.

It is intended to plant such portions of the site not covered by the plaza with shrubs and to enclose the Memorial in a setting of landscape gardening, by means of paths, lawns, borders and planting. The trees on the site are being carefully preserved so that their foliage may not only afford shade but enhance the general color scheme as well.

The stone selected for the entire Memorial is a white granite, extremely beautiful in texture and color and of a sufficiently delicate pink cast to temper it and to counteract the natural tendency of pure white stones to take on a bluish cast under the sky. Its geological composition is as nearly perfect as can be obtained and it was selected after exhaustive mechanical tests on account of its hardness and consequent great durability, the latter quality being naturally an essential in the choice of material for a monument destined to last through the ages. In order to give it as brilliant

a texture as possible it is tooled . . . with fine vertical lines. This treatment has the same effect on granite as the cutting of facets on precious stones and tends to produce a sparkle, brilliancy and play of light and shade extremely pleasing to the eye.

The column, forming the central motive of the Memorial is surmounted by a massive bronze tripod, the bowl of which is illuminated by means of a cluster of a hundred concealed incandescent lights. . . . From the upper platform a door leads to the outside parapet, concealed in the cap of the column. From this parapet forming a promenade three hundred feet above the terrace level a magnificent view of the surrounding country is obtained. The panoramic scene presented by the waters of the Lake is imposing and wonderfully beautiful at all times of the day, while at night the impression conveyed by the intense quiet and the twinkling of innumerable lights is fairy-like and reminiscent of the star-lit lagoons of the Adriatic. . . .

The Colonnade forming a pendant to the Museum at the right of the Column will enclose on three sides of a statue typifying "Peace by Arbitration." The height of the columns of the Colonnade will be the same as those of the Museum, thus preserving a symmetrical sky-line. The open space enclosed within the Colonnade will be laid out in the manner of a formal garden, bisected by a pathway terminating at either end in a fountain built in the walls. From the garden level a broad flight of steps leads to the terrace. In the center of the flight and on the main axis of the structure the statue and pedestal will be placed. . . .

To tie together the three elements of the composition there will be laid out on the main terraces . . . and in the spaces between the Column and the flanking buildings in a scheme of landscape gardening whose main feature will consist of a green-sward one hundred and fifty feet long and seventy-five feet wide. At either side two granite walks will be built leading from the Museum and Colonnade terraces to the plaza surrounding the Column. These in turn will be bordered with shrubs, bay-trees, flower beds, and other accessories which go to make up a garden wherein the public may find shelter and repose and a restful lounging place. Four large vases at the center terrace [plaza] and smaller ones at the ends will serve to embellish the general layout and at either end of the steps leading from the water's edge a bronze standard bearing the national flag will be erected. Furthermore in deference to the naval character of the Memorial it is proposed to use as attributes in the treatment of the

grounds bronze cannon, mortars and anchors presented by the Navy Department.

This is in brief a description of the salient features of the Memorial. Erected to commemorate the valor and courage of a great commander and an epoch-making event in the history of the United States—it shall have doubly fulfilled its mission if, down through the ages it shall stand—the first milestone on the high road of everlasting peace.

[signed] J. H. Freedlander²⁵

From this description, it is clear that Freedlander sought to create an imposing memorial that would not only dominate its immediate location, but would also stand so tall that it would be visible from long distances (Figure 7 and Figure 8). With his design, Freedlander sought to appropriately commemorate the long peace between the United States, Britain, and Canada.



Figure 7. “Bird’s-eye view of Perry Memorial and Put-in-Bay Harbor looking north,” circa 1920. Photographer, Hamilton Maxwell, Inc., New York. (Source: PEVI archives, file 17-3-12, PEVI-MON, negative no. PV736)



Figure 8. Perry’s Victory Memorial, circa 1935. Photographer unknown. (Source: PEVI archives, file 17-4-8, PEVI-MON)

The landscape around the memorial was carefully considered to provide an appropriate setting for the monument itself. As noted in the National Register nomination Additional Documentation for the memorial, “The column and its grounds are an excellent example of the harmony of building and landscaping that is integral to the Beaux Arts style in America, with its monumental classicism in architecture set within a designed, formal landscape.”²⁶ Freedlander and Seymour considered views both to and from the monument, utilizing Beaux Arts planning features such as axial avenues and planned vistas. As noted in the National Register Additional Documentation:

The openness of the site, achieved through the establishment of lawn areas on the east and west sides of the plazas that reflect the open expanses of water on the north and south sides, provides the symmetrical balance that is one of the hallmarks of Beaux Arts Classicism. . . .

The most prominent vegetative feature of the site, however, is the flat, grassed lawn, a mixture of grasses, clover, and weeds. . . . The architects specified a mixture of several types of grasses and white clover in the earliest landscape design, but it is unknown whether that was ultimately the mix planted or if any of the original grasses remain. Nevertheless, the wide, flat, horizontal expanse of grass as a visual counter to the verticality of the

25. Text published in in the *Official Souvenir Program of the Perry's Victory Centennial, 1813–1913*, by the Interstate Board of the Perry's Victory Centennial Commissioners, 1913 (35, 37, 39, 41, 43, 45, and 47). Cited in Sherda K. Williams and Susan Calafate Boyle,

Cultural Landscape Report: Perry's Victory and International Peace Memorial, Put-in-Bay, Ohio (Omaha, Nebraska: National Park Service, Midwest Region, Office of Planning and Resource Preservation, 1994), Appendix C. Harvey, Section 7, 4.

Memorial column was integral to the original design concept. . . . In addition, the planter beds located on the upper plaza were specified as beds of grass, called grass panels in the original design. As grass panels, they would carry the overall effect of the horizontal plane of the lawn onto the plaza. Although planted in barberry hedging between 1925 and 1933, they have been planted in grass, per the original design, since the removal of the barberry hedges beginning in the mid-1930s.²⁷

In 1924, Freedlander redesigned some of the landscape plantings in response to a shortfall in funding for the designed landscape. The revised design includes plantings of trees and shrubs along the east and west boundaries of the original site, framing the plazas and lawns.²⁸

The Architectural Context

Learning from Antiquity

The history of monuments in the form of columns and obelisks dates back to antiquity, and was well known to the architects engaged in the competition to design the Perry's Victory Memorial.

Beginning in the seventeenth century, upon completion of their formal education, young men of wealth embarked on tours of Europe. The Grand Tour was intended to enlighten the traveler in the history and culture of the continent, especially the art and architecture of classical antiquity and the Renaissance. Often guided by a knowledgeable tutor, the young men typically visited Turin, Florence, Padua, Bologna, Venice, and Rome, as well as Naples, to view Herculaneum and Pompeii; less frequently they traveled to southern Italy, Malta, or Greece. Art and archeology, Classical buildings and structures—some in ruins—as well as universities and libraries, and various cultural venues for art and music, were

a particular focus of the tours. Many also visited Austria and Germany as part of the tour.

The practice of the Grand Tour continued through the mid-nineteenth century, when rail travel made the cultural capitals of Europe available to even less well-to-do travelers. These tours, together with widely publicized archeological excavations by the British Museum and others during the nineteenth century, helped bring about greater interest in Classical precedents in art and architecture. Travels by architects to view the works of antiquity became increasingly common, directly influencing work in Europe and America on public monuments as well as buildings.

A Short History of Architecture, published in 1906, noted that memorial architecture of the Roman Empire was often columnar, influenced by memorial columns found in Greece during the fourth and third centuries BC.²⁹ The author summarized this characteristic of Greco-Roman architecture as follows:

The Greeks . . . used columns both short and lofty to support votive figures and statues of famous men; but these columns had that definite purpose, and were merely pedestals taking columnar shape because that shape was so very familiar to the Grecian builders and the Grecian people. We do not hear of columns which in themselves were important; but among the Romans it became a column thing to raise a very large shaft with moulded base supported upon a pedestal carrying inscriptions, and with a capital differing widely from the accepted orders, one and all. Thus there were some which were designed independently for their own sake only, such as the famous column erected in honour of Caius Dullius and the first naval successes of the Roman people. This was the famous Rostral Column . . . erected about 260 B.C.³⁰

27. Ibid., Section 7, 10–11.

28. Ibid., Section 7, 11–12. The National Register nomination Additional Documentation notes that photographic documentation indicates that portions of the revised planting plan were implemented. See also *Cultural Landscape Report*, 37–41.

29. Sturgis, 333.

30. Ibid., 334.

The Column of Trajan in Rome (113 CE) was so noteworthy as a columnar memorial that it was widely studied in the eighteenth and nineteenth centuries (Figure 9). It was the first memorial column to be realized in the form of a *columna cochlis*, a column of spiral character or enclosing a spiral. The carved spiral scroll that ornaments the Column of Trajan tells the history of the Dacian Wars, fought between 101 and 106 CE. To celebrate his triumphs in this conflict, and using the spoils of battle to fund his commemorative efforts, Trajan commissioned a plaza with colonnades, libraries, a civic space, and possibly a temple. At the center of the plaza was a stone column, 126 feet high, surmounted by a bronze statue of Emperor Trajan. The story of the Dacian campaigns is told in 155 scenes with more than 2,500 figures, arranged in a band 4 feet high near base and 3 feet high near capital.³¹

Trajan's column was influential in the development of later monuments in Rome and across the Empire. A similar monument is the Column of Marcus Aurelius and Faustina in Rome (180 CE), also a Doric column with a continuous staircase through the shaft, and with the spiral form repeated in the exterior ornamentation. Also a military monument, this column commemorates the military campaigns by the emperor against the Quadi between 172 and 175 CE.

Trajan's Column was an attraction for architects and tourists, both as a work of art and for the views available from the top. Plaster casts of the column were made starting in the 1500s. At the behest of Pope Gregory XIII during the 1580s, the statues of Trajan and Marcus Aurelius were each replaced with one of Saint Peter.



Figure 9. Trajan's column, circa 1896. (Source: Conrad Cichorius, *The Reliefs of Trajan's Column*, (Verlag von Georg Reimer, Berlin 1896), plate no. 1)

Among the notable columnar monuments constructed in the centuries that followed was the monument to the Great Fire of London (known as "The Monument"), constructed between 1671 and 1677 to commemorate the fire of September 1666 and the rebuilding of the city that followed (Figure 10). Designed by Sir Christopher Wren, architect of St. Paul's Cathedral, and Dr. Robert Hooke, the monument is in the form of a Doric column constructed of Portland stone, 202 feet high, surmounted by a gilded bronze orb. An interior staircase leads to a viewing platform.³²

31. "A War Diary Soars over Rome," *National Geographic*, <http://www.nationalgeographic.com/trajan-column/article.html>, accessed 2017.

32. "The Monument: Great Fire of London, 1666," <http://www.themonument.info/history/introduction.html>, accessed March 2017. The stonework was cleaned and repaired, and the urn re-gilded, in 2008.



Figure 10. The Monument to the Great Fire of London, as illustrated by Sutton Nicholls, circa 1750. (Source: "The Monument: Great Fire of London, 1666," <http://www.themonument.info/history/introduction.html>)

The Beaux Arts Movement

Beaux Arts architecture reflects the neoclassical architectural style taught at the École des Beaux-Arts in Paris. The school was first founded as the Académie Royale d'Architecture in 1671 by Jean-Baptiste Colbert, a minister of Louis XIV. In 1793 the school merged with the Académie Royale de Peinture et de Sculpture, founded in 1648, and offered instruction in drawing, painting, sculpture, architecture, and engraving.³³

Beaux Arts training emphasized examples of Roman architecture from the reigns of Augustus and the Severan emperors, as well as Italian

Renaissance and French and Italian Baroque models.³⁴ Drawings, as well as photographs, provided a resource documenting the antique examples.³⁵

Classical influences had been reflected in American architecture since the late eighteenth century. The architects of the new country found architectural principles of ancient Greek and Roman civilizations to be appropriate models for the buildings of the new democracy. The archeological discoveries uncovered at the ancient Roman sites of Pompeii and Herculaneum, and the work of Scottish architect Robert Adam (1728–1792), and publications helped to inform architects and others about the architecture of antiquity. In the United States as well as in France, Neoclassical styles were seen to embody republican ideals.

Among the early proponents of Neoclassical style were Thomas Jefferson in his design of the Virginia State Capitol (1785–1786); Benjamin Latrobe, for example, in the Bank of Pennsylvania in Philadelphia (1801); and Latrobe (as Surveyor of the Public Buildings of the United States) with William Thornton and Charles Bulfinch, as well as Thomas Walter, in the design of the United States Capitol (1793–1829). Followers of Latrobe who embraced the Neoclassical style included William Strickland, Robert Mills, Ithiel Town, Thomas Walter, and Alexander Jackson Davis. Examples of their work on public monuments include Mills' design for the Washington Monument in Baltimore (discussed below), among many others.

Richard Morris Hunt (1827–1895) became the first American architectural student at the Ecole des Beaux-Arts in Paris in 1846. Hunt was interested in the Neoclassical and Neo-Renaissance styles, and was inspired by European examples in his designs for estates such as Biltmore (1888–1895) in North

33. "Ecole des Beaux-Arts," *Encyclopedia Britannica*, <https://www.britannica.com/topic/Ecole-des-Beaux-Arts>, accessed 2017. Instruction in architecture continued at the school until 1968. After 1935, the Beaux Arts curriculum began to be displaced by a program influenced by the Bauhaus.

34. *Ibid.*

35. *Ibid.*

Carolina, the Breakers in Newport, Rhode Island (1892–1895), and others for families such as the Astors and the Vanderbilts. He also designed the pedestal for the Statue of Liberty (1886) in New York Harbor, and the Metropolitan Museum of Art in New York City (1880). Hunt, who was one of the founders of the American Institute of Architects and was elected its president in 1888, was extremely influential in introducing Beaux Arts architecture to the United States.

Other notable American graduates of the Ecole des Beaux-Arts included Henry Hobson Richardson (1838–1886), and Charles Follen McKim (1847–1909), who graduated in 1870 and founded the firm of architects McKim, Mead & White, with William Rutherford Mead (1846–1928) and Stanford White (1853–1906). McKim, Mead & White designed a number of major Neoclassical buildings including the Boston Public Library (1887–1895) and Pennsylvania Station in New York City (1902–1911), as well as buildings at the 1893 World's Columbian Exposition Chicago (Figure 11).

American Neoclassical architects of the twentieth century included John Russell Pope (1874–1937), who designed the Jefferson Memorial and the National Gallery of Art in Washington, D.C., and Paul Philippe Cret (1876–1945), who designed the Hartford County Building in Hartford, Connecticut. The Jefferson Memorial, designed by Pope with Otto R. Eggers and Daniel P. Higgins, and constructed in 1934–1943, was inspired by the Pantheon in Rome and features a dome, circular colonnade, and Corinthian capitals (Figure 12). Cret also received recognition for his design in the competition for the Perry's Victory Memorial.



Figure 11. Boston Public Library, circa 1899. (Source: Library of Congress)



Figure 12. The Jefferson Memorial, 1976. (Source: Historic American Building Survey, HABS DC-4-1)

By 1893, a Beaux Arts curriculum in architecture was established at the Massachusetts Institute of Technology (MIT), followed by Columbia University, the University of Pennsylvania, and others. The Beaux-Arts Institute of Design in New York City instituted a program in 1916 for architects, painters, and sculptors to work as collaborators on designs.³⁶

Together with the infusion of the Neoclassical aesthetic in architecture of the nineteenth and early twentieth centuries was a similar influence in sculpture, especially public sculpture for outdoor venues. Public monuments, many of which were figural sculptures commemorating military leaders and heroes, began to appear in American cities. The artists engaged to create these statues were

36. "Ecole des Beaux-Arts," *Encyclopedia Britannica*.

typically Europeans who followed the Neoclassical aesthetic. For example, the French sculptor Jean Antoine Houdon created a life-size statue of George Washington for the Virginia State Capitol at Richmond, working from life studies.³⁷ Although Perry's Victory Memorial is not surmounted by a figural sculpture, many other monuments of the period featured a statue atop the structure. Classically inspired statues also graced many Beaux Arts public buildings.

Especially through the influence of Daniel Burnham, and as a result of the World's Columbian Exposition of 1893 in Chicago, the tenets of the Beaux Arts style were reflected in the City Beautiful movement of the late nineteenth and early twentieth centuries. Rapid industrialization and immigration had led to unprecedented growth of American cities. The City Beautiful movement, as a response, was concerned not only with the aesthetics of urban design, but also with improving the quality of life for urban dwellers and the way in which cities functioned. The World's Columbian Exposition provided a striking illustration of how the City Beautiful could be realized (Figure 13 and Figure 14).



Figure 13. The lagoon, Statue of the Republic, and peristyle at the World's Columbian Exposition, 1893. (Source: Library of Congress)



Figure 14. The Electricity Building (left) and Manufacturer's Building (right) at the World's Columbian Exposition, 1893. (Source: New York Public Library Digital Collections)

The Exposition was organized to commemorate the four hundredth anniversary of Columbus's arrival in the New World. Architect Daniel H. Burnham, the exposition's director of works, drew inspiration from the 1889 Paris Universal Exposition, which featured the Eiffel Tower. For Burnham, "architecture and sculpture would be to the Chicago fair what engineering had been to the Paris exposition." The sculptors engaged to contribute major works included Augustus Saint-Gaudens, Frederick MacMonnies, and Daniel Chester French. Architects of the major buildings at the fair included Richard Morris Hunt, Charles McKim, William Mead, Stanford White, Henry Van Brunt, Frank Howe, William L. Jenney, William B. Mundie, Henry Ives Cobb, Robert Peabody, John Stearns, George B. Post, Solon Beman, Dankmar Adler, and Louis Sullivan. Although Sullivan objected to the referential character of Neoclassical design, the buildings created by the other architects—many of whom who had studied at the Ecole des Beaux-Arts or otherwise embraced the Beaux Arts style through their work—were Neoclassical in character, finished with plaster (as temporary structures) and painted white, giving the name "the White City" to the exposition's main buildings.

Although the plan for the lagoon area of the exposition grounds reflected Frederick Law Olmsted's preferences for a natural and

37. "From Model to Monument: American Public Sculpture, 1865–1915," *Encyclopedia of Chicago*, <http://www.encyclopedia.chicagohistory.org/pages/61.html>, accessed 2017.

picturesque landscape, the design of the White City reflected the formal order and planning associated with the Beaux Arts style.³⁸ As historian Thomas Hines has noted:

The central ideological conflict surrounding the City Beautiful pitted invention and innovation against continuity and tradition. The newness and cultural nationalism espoused by Louis Sullivan and Frank Lloyd Wright lay in their quest for a uniquely American culture, one with maturity and confidence enough to cease relying so heavily on Old World traditions. Burnham and his allies, by contrast, believed that the sometimes frantic quest for “American-ness” the obsession with New World originality and horror of all things European” was itself a kind of insecurity, and that maturity would consist in an acknowledgment that America was not culturally isolated from the rest of the world. Burnham and his associates saw the United States as a rightful heir to the traditions of Western culture and chose thus to recall, celebrate, and use those traditions themselves.

However eclectic it became in its borrowings and whatever the style of particular buildings within its plans, the provenance and thrust of City Beautiful planning was classical and Baroque in its emphasis upon processions of buildings and open spaces arranged in groups. For the parallax effect, it depended on the movement of the individual, or the human procession, through space from one specific point to another. Great buildings or monuments were sited so as to become the terminal vistas of long, converging, diagonal axes. The impact on the individual of this arrangement, repetition, and ceremonial procession was, in the Baroque and in the City Beautiful, calculatedly powerful, impressive, and moving.³⁹

Through his work on the exposition, Burnham launched the City Beautiful movement that led fifteen years later to the *Plan of Chicago* (1909).

Construction of Perry’s Victory and International Peace Memorial

The site recommended by original designer John Eisenmann, on the isthmus of South Bass Island, adjacent to the city of Put-in-Bay, Ohio, was purchased by the State of Ohio between July 1911 and May 1912 and ceded to the United States in May 1913, though the federal government did not accept title to the land and monument until 1919. The original parcel consisted of 14.25-acres.

By May 1912, a draft of specifications had been prepared by the architects and estimates for construction of the memorial were solicited. In June 1912, the bid of \$329,851.00 by John C. Robinson & Sons of New York City and Chicago was accepted, and a contract for construction in the amount of \$357,588.00 was signed on September 10, 1912. A separate contract was awarded by the Inter-State Board to John H. Feick, a contractor from Sandusky, Ohio, to clear the construction site, which was a wooded swamp.⁴⁰

Construction of the memorial began in June 1912 with a 600-foot-long dock to reach deeper water and receive ships carrying shipments of granite. A rail line was laid from the dock to the construction site, and storehouses, a generating plant, and other support structures were built, as well as a cofferdam around the foundation site. Excavation on the foundation began on December 4, 1912, with bedrock at the monument site located at only 12 feet below the surface. On June 27, 1913, the base ring of concrete was ready for the first course of granite.

In April, barges carrying granite began arriving at the site, and the first granite blocks were laid on the base ring on June 27, 1913. Two courses of granite were in place by the Fourth of July, when work was stopped and the site cleared for a

38. “Architecture: The City Beautiful Movement,” *Encyclopedia of Chicago*, <http://www.encyclopedia.chicagohistory.org/pages/61.html>, accessed 2017. See also Thomas S. Hines, *Burnham of Chicago: Architect and*

Planner, second edition (Chicago: University of Chicago Press, 2009).

39. Ibid.

40. Ibid.

cornerstone-laying ceremony, after which work resumed. By early September, eight courses of granite were in place, with work halted for the centennial celebration on September 10, 1913. Thousands of people came to the island to visit the reconstructed brig, the US Brig Niagara and listen to speeches, including a featured address by former President William Howard Taft. A ceremony honored the three British and three American officers who had been killed in the battle, whose remains were reinterred in a crypt in the floor of the rotunda on September 11, 1913.

After the centennial celebration, construction continued. A specially designed derrick was constructed to assist in placing the granite blocks, which weighed as much as five tons each. On September 15, 1913, the limestone rotunda dome was completed. Laying of granite courses continued through the next ten months.⁴¹ When work on the penthouse was completed, installation of interior stone and tile finishes proceeded. Carving of the stone rotunda walls continued through late 1913 and 1914. An electric Otis elevator was installed.

In July 1914, the echinus (the rounded molding below the abacus) was complete, and in July and August 1914 the soffits, fascias, and observation deck were constructed. By August 31, 1914, the observation deck was completed. In October and November 1914 the penthouse was constructed, and from November 1914 to February 1915 the joints were pointed. By November 18, 1914, waterproofing atop the penthouse was in progress.⁴²

The lantern, designed by architect Joseph Freedlander, measured 22 feet 10 inches in height and 17 feet 4 inches in diameter and was cast by

the Gorham Company of Providence, Rhode Island. After assembly at the foundry in August 1914, the lantern was disassembled, transported in sections to the project site, lifted to the top of the monument in pieces, and assembled by January 1915.

As work on the monument structure continued, a separate contract was issued for work at the base. On October 27, 1914, the Stewart Engineering Corporation of New York City was awarded a contract for filling and leveling the grounds, and for constructing an architectural base consisting of an upper and lower plaza. The original design called for the plazas to be 750 feet wide, with a museum at one end and a colonnade dedicated to international peace at the other. However, by June 1912, it became apparent that federal appropriations would not be made available until sufficient funding had been appropriated by the states to construct “a fitting memorial.” To ensure that federal funding would be provided for the memorial, and given that sufficient backing was not available from the states to construct the colonnade and accessory buildings of the original plan, a joint decision was reached by the building committee, executive committee, and federal commissioners that only the plaza and Doric column would constitute the memorial.⁴³

By the fall of 1914, grounds work was progressing and the formwork was in progress for the upper plaza, the northeast quadrant. Work continued through the winter, and in March 1915, the upper plaza structure was completed. From March through June 1915, the granite site walls and urns were constructed. Funding limitations prevented installation of stone paving and in April 1915, the plazas were instead covered with crushed gravel and granite stair treads were installed.⁴⁴ The

41. Alfred Mongin, *A Construction History of the PVIPM* (Washington, D.C.: National Park Service, 10 August 1961). The National Park Service web site provides a similar chronology, stating that by 15 October 1913, sixteen courses of granite had been laid; by 16 December 1913, twenty-four courses; by 20 February 1914, 38 courses; and by 17 May 1914, fifty-eight courses; and by July 1914,

seventy-eight courses.

42. Ibid.

43. *Perry's Victory: First Annual Report of the Perry's Memorial Commission*, 18.

44. Ibid. Also, National Park Service, Perry's Victory and International Peace Memorial web site, <http://www.nps.gov/pevi/>, “Building the Monument,” accessed 2017.

monument opened to the public on June 13, 1915 (Figure 43).



Figure 15. Perry's Victory Memorial during construction, 1914. (Source: PEVI archives, file 13-3-3, PEVI-MON)

Comparative Examples

In 1912, a series of articles in the widely read journal *The Brickbuilder* addressed the design of groups of buildings and structures in the United States. The author considered the design for the Robert Fulton Memorial, and Freedlander and Seymour's design for Perry's Victory Memorial, stressing the successful use of the Neoclassical idiom.⁴⁵ Like Daniel Burnham (and unlike Louis Sullivan), in considering the most appropriate style for the buildings of the World's Columbian Exposition, the author found that stylistic innovations could not provide any better solution to the design of these public monument than was offered by reference to antiquity. He noted:

Monumental architecture; architecture invariably of the severest classic; the greatest, noblest, simplest motives; long colonnades, great isolated columns, terraces, broad flights of steps; these are the elements of the accepted ideal. No matter if the motive be as old as Rome, no matter whether it be repeated over and over again at different places, whether it be used successively through different ages, such are not considered objections if only the composition be of the highest dignity and grandeur. In this spirit the work is judged; therefore the ideal differs from other modern ideals, for nothing new is demanded . . . there is little new in the Robert Fulton colonnade, the terraces or flights of steps. The motives are exquisitely handled and it is a work of the greatest nobility. Unrestrained originality tends perhaps to the fantastic, the freakish, is inconsistent with the point of view just outlined and so is anathema to the highest American culture.

In consideration, then, of the monumental group we must brush aside the question of originality. A Doric column is perhaps the noblest form ever given a shaft, and a Doric column won the Perry Memorial competition.⁴⁶

The following narrative further considers the question of the architectural and artistic context

45. Alfred Morton Gitchens, "Recent American Group-Plans: II. Monumental Groups," *The Brickbuilder* XXI, no. 11, November 1912, 283–286. The article compares the two memorials, together with the municipal buildings group designed for Springfield, Massachusetts by Pell

and Corbett, Architects. The Robert Fulton Memorial in New York City, designed by architect H. Van B. Magonigle in response to a competition in 1909, was never constructed.

46. Ibid.

established by the prevailing Beaux Arts style by exploring a range of monuments designed and constructed prior to or concurrently with the Perry's Victory Memorial. These examples help to illustrate the progression of Neoclassical monument design in the United States from the nineteenth through early twentieth centuries, and reveal the influences and cross-currents of architectural design during this period.

Washington Monument, Baltimore, Maryland

In 1814, a competition was held to select a designer for a new monument to honor George Washington. The winner of the competition was architect Robert Mills (1781–1855), who was educated at the College of Charleston. Following graduation Mills worked under James Hoban, the architect of the White House, in Washington D.C. While in Washington, Mills also sought guidance from President Thomas Jefferson. Jefferson invited Mills to his home at Monticello, where Mills studied until 1803, when he returned to Washington to work under Benjamin Latrobe, then architect of public buildings in the city.

Under Latrobe, Mills expanded his knowledge of Greek architectural forms, eventually opening his own office in 1808 in Philadelphia. During his time in Philadelphia, Mills designed two wings that were added to Independence Hall in 1812.⁴⁷

In 1820, Mills returned to South Carolina, where he served as architect of the State Board of Public Works. It was in this role that he designed the Records Building (1823) known for its “fireproof” design. In 1836, Mills was appointed architect and engineer for the federal government, designing a number of custom houses, courthouses, the original portion of the Treasury Building (1841), the old Patent Office (1842, today the Donald W. Reynolds Center for American Art and

Portraiture), and the old Post Office (1839, today the Hotel Monaco).⁴⁸

Mills's original design for the Washington Monument consisted of a monumental column with a series of six iron balconies spaced vertically up the column (Figure 16). An internal stair led to an observation deck at the top of the column, which was topped by a statue of Washington. By the time construction began in 1815, Mills had altered his design to consist of a simple column on a square base, similar to Trajan's Column. A statue of George Washington was still planned to be placed at the top of the monument. The monument was completed in 1829, with the placement of the Washington statue at the top of the structure (Figure 17).⁴⁹

Comparison to Perry's Victory. Like the later Perry's Victory Memorial, the Washington Monument in Baltimore utilized the columnar form to memorialize a heroic figure, in this case George Washington. The Washington Monument was clearly influenced by classical design, with the simple column set upon a base.

Landscape Features. The Washington Monument in Baltimore is centered in a roundabout at the intersection of Mount Vernon Place and North Charles Streets. The roundabout is paved with cobblestones, while the area directly adjacent to the monument within the traffic circle is paved with concrete. A cast iron fence encircles the base of the monument.

Green spaces are located in the boulevards at Mount Vernon Place and North Charles Street. Fountains are present in the boulevards to the east, south, and west. Plantings and paving in these park areas emphasize the visual axis along the two streets.

47. Henry F. Whitey, AIA and Elise Rathbun Withey. *Biographical Dictionary of American Architects (Deceased)*. Los Angeles: Hennessey & Ingalls, Inc., 1970, 421–422.

48. *Ibid.*, 422.

49. “Baltimore's Washington Monument.” Mount Vernon Place Conservancy. <http://mvpconservancy.org/history>, accessed 2017.



Figure 16. Robert Mills's original design for the Washington Monument in Baltimore. (Source: Maryland Historical Society)



Figure 17. The completed Washington Monument in Baltimore, circa 1829. (Source: Maryland Historical Society)

Modifications for Accessibility. No changes have been made to the Washington Monument in Baltimore to provide universal accessibility or to modify the paving at the approach or base of the monument. However, changes have been proposed to the adjacent greenspaces in the boulevards, including the improvement of curb cuts at pedestrian crossings and the creation of stepless entrances where historic fabric would not be disturbed.⁵⁰

Washington Monument, Washington, D.C.

In 1833, the Washington National Monument Society was formed to fund and build a monument to honor George Washington in Washington, D.C. The organization sought designs for the monument before selecting a design by Robert Mills in 1845. Mills's initial plan called for an Egyptian-inspired obelisk, 600 feet tall, surrounded by thirty 100-foot-tall columns at its base (Figure 18). Construction began in 1848 and continued until 1854, when construction was stopped due to a lack of funds. At this point, the monument had reached a height of 156 feet. After a change in the leadership, the Washington National Monument Society declared bankruptcy in 1854.⁵¹

50. *Mount Vernon Place: Restoration and Revitalization Master Plan*, <http://mvpconservancy.org/master-plan/>, accessed 2017; personal correspondence by the authors with staff from the Commission

for Historical and Architectural Preservation, City of Baltimore 2017.

51. "Washington Monument: History and Culture, National Park Service," <https://www.nps.gov/wamo/learn/historyculture/index.htm>, accessed 2017.



Figure 18. Robert Mills's original design for the Washington Monument in Washington, D.C. (Source: Library of Congress.)

Construction resumed in 1876, following a joint resolution passed by Congress which assumed responsibility of funding and building the monument. The U.S. Army Corps of Engineers, led by Lt. Col. Thomas Lincoln Casey, oversaw completion of the monument. The quarry used during the first phase of construction was no longer active, thus two new types of stone were used for the upper portions of the monument. Changes were also made to Mills's original design, including a reduction in the height of the structure from 600 to 555 feet, to make the height equal to ten times the width of the base. Also, the ring of columns was eliminated from the design. The capstone was placed at the top of the monument on December 6, 1884, and the monument was dedicated on February 21, 1885.⁵²

Comparison to Perry's Victory. While similar in concept to the vertical shaft form of the Perry's Victory Memorial, the Washington Monument, as constructed, is clearly influenced by ancient Egyptian obelisks rather than Greek Classical designs (Figure 19 and Figure 20). The original design by Robert Mills, however, was more Neoclassical in style, with a ring of columns at the base of the obelisk.



Figure 19. View of the Washington Monument in 1903. (Source: Library of Congress)

52. Ibid.



Figure 20. Aerial view of the Washington Monument, Washington D.C., 2006. (Source: Library of Congress.)

Landscape Features. The Washington Monument is located on the National Mall east of 15th Street. The monument is sited on a paved plaza, circular in plan, which is accessed by a series of paved paths that lead to surrounding areas of the mall. The pathways slope upward slightly from the lower areas surrounding the monument, allowing for universal access to the monument and surrounding plaza. The landscape immediately around the monument consists of mown grass, affording views from the plaza to the Lincoln Memorial to the west and the United States Capitol to the east. (See further discussion of modifications to landscape, below.)

Modifications for Accessibility. In 2005, changes were completed to the Washington Monument grounds. These changes were intended to address security concerns but also served to revitalize the site, which featured a poorly graded hill, eroded grass, and deteriorated

concrete and asphalt paving.⁵³ Following an invited design competition to improve the 72-acre site, which is a public space used for commemorative events, recreation, and demonstrations, the firm of Olin Partnership of Philadelphia, Pennsylvania, was selected to design a security solution and landscape improvements for the site. The design included protective low granite walls and new plantings, lighting, furnishings and a granite-paved plaza at the monument base; universal access within the site was addressed as part of these improvements.⁵⁴ The project received an ASLA General Design Honor Award in 2008.

Nelson's Column

Among the widely publicized columnar memorials of the mid-nineteenth century was Nelson's Column in Trafalgar Square, London. The monument memorializes Admiral Horatio Nelson, an extremely popular British naval hero. Nelson's last and most famous battle was the Battle of Trafalgar (October 21, 1805), a naval engagement fought off the Spanish coast near Trafalgar, by the British Royal Navy against the French and Spanish fleets, during the War of the Third Coalition (August–December 1805) of the Napoleonic Wars (1803–1815). Twenty-seven British ships of the line led by Admiral Lord Nelson aboard HMS *Victory* defeated thirty-three French and Spanish ships. The battle, in which the French and Spanish lost a total of twenty-two ships and the British none, effectively ended French plans to invade England and reflected Britain's naval superiority during the eighteenth century. Nelson was shot by a French musketeer during the battle and died aboard his flagship HMS *Victory*.⁵⁵

Consideration of a monument to Nelson was delayed by the Napoleonic Wars, but finally, in

53. Personal correspondence by the authors with representatives of the National Park Service, Washington, D.C., 2017; Olin Studio web site, <https://www.theolinstudio.com/washington-monument-grounds/>, accessed 2017.

54. American Society of Landscape Architects web site, <https://www.asla.org/awards/2008/08winners/236.html>, accessed 2017.

55. "Horatio Nelson, Viscount Nelson," *Encyclopedia Britannica*, <https://www.britannica.com/biography/Horatio-Nelson-Viscount-Nelson>, accessed 2017; "The Battle of Waterloo, 1815," <http://www.eyewitnessto history.com/waterloo.htm>, accessed 2017.

February 1838, a committee of peers, Members of Parliament, and others was formed to create a monument to be funded by public subscription. The government provided a site in Trafalgar Square, in front of the newly completed National Gallery. A design competition was held, concluding in January 1839, and a subcommittee headed by the Duke of Wellington—who had defeated Napoleon at the Battle of Waterloo in 1815—selected the winning entry. Designed by architect William Railton, the monument consisted of a Corinthian column surmounted by a statue of Nelson, flanked by four sculpted lions. A series of steps led to the pedestal of the column.⁵⁶

After criticism of the competition caused it to be re-run, Railton was again selected for a slightly revised design, with a slightly lower column due to concerns over stability. The base was designed in granite and the shaft in Craigleith sandstone, but once construction began, the shaft was also constructed of granite. The fluted column was constructed of solid blocks of granite quarried on Dartmoor. The Corinthian capital was cast in bronze elements at the Woolwich Arsenal foundry, using cannon salvaged from the wreck of HMS *Royal George*. The capital is based on a Classical precedent—the Temple of Mars Ultor in Rome—and modeled by C. H. Smith.⁵⁷

In 1825, Railton had traveled in Greece and Egypt. He later published his drawings of a recently excavated temple on Corfu as part of *The Antiquities of Athens and Other Monuments of Greece*, authored by James Stuart (1862) in a volume titled, *The newly-discovered Temple at Cadachio Illustrated*. *The Antiquities of Athens* was highly influential in the popularization of the Greek Revival Style in Britain. From 1838 to 1848, Railton was employed as an architect to the Ecclesiastical Commissioners. He developed

standard designs for parsonages, and also designed churches and chapels. Railton received fourth place in a competition to design the replacement Houses of Parliament (recently destroyed by fire), but is best known for his winning entry in the competition to design the monument to Admiral Lord Nelson.⁵⁸

Sculptor Edward Hodges Baily (1788–1867), who was selected to create the statue of Nelson, won second prize for his design of an obelisk surrounded by sculptures (Figure 22). Baily had received a Royal Academy gold medal for a sculpture of Hercules, and was well-known for his work in the Neoclassical style.⁵⁹

Bronze reliefs were cast depicting the Battle of Cape St. Vincent (by sculptor Musgrave Watson), the Battle of the Nile (by sculptor William F. Woodington), the Battle of Copenhagen (by sculptor John Ternouth), and the Death of Nelson (by sculptor John Edward Carew), and installed on the pedestal in 1849 through 1854. The Barbary lions at the base were initially designed in granite, and John Graham Lough received the commission. However, in 1846 Lough declined the commission due to restrictions imposed by Railton, and the lions were instead designed in bronze by sculptor Sir Edwin Landseer (1802–1873).⁶⁰

Construction began in 1840, and the column was completed in 1843.

56. Peter Mathews, *London's Statues and Monuments*, <https://books.google.com/>, accessed 2017.
57. Ibid.; F. M. O'Donoghue, rev. Geoffrey Tyack, "Railton, William (1800–1877)," *Oxford Dictionary of National Biography*, <http://www.oxforddnb.com/public/index.html>, accessed 2017.

58. Ibid.
59. "Edward Hodges Bailey (1788–1867)," <http://www.oxfordreference.com/view/10.1093/oi/authority.20110803095441484>, accessed 2017.
60. "Sir Edwin Landseer," *Encyclopedia Britannica*, <https://www.britannica.com/biography/Edwin-Landseer>, accessed 2017.



Figure 21. Nelson's Column, undated photograph. (Source: The New York Public Library Digital Collections.)



Figure 22. Nelson's Column in Trafalgar Square, central London, England, circa 1949. (Source: National Archives of the U.K.)

Comparison to Perry's Victory. Like the later Perry's Victory Memorial, Nelson's Column utilized the columnar form to memorialize a heroic figure, in this case Admiral Horatio Nelson. Nelson's Column, which was modelled after the Temple of Mars Ultor in Rome, was clearly heavily influenced by classical design.

Landscape Features. Nelson's Column is located in Trafalgar Square in central London (Figure 21). The square is paved with stone and the only vegetation present consists of trees along the roads that line the east and west sides of the square. Steel bollards ring the base of the monument.

Modifications for Accessibility. No changes have been made to Nelson's Column in Trafalgar Square to provide universal accessibility or to modify the paving at the approach or base of the monument.⁶¹ Also, access to the interior of the monument is not available to the public.

Norfolk Naval Pillar

Another columnar monument to Nelson is the Norfolk Naval Pillar (also known as Britannia Monument or Nelson's Monument), situated on the Denes, Great Yarmouth, in Norfolk, England, a Grade I listed structure (the highest level afforded to historic structures in England). The Monument was designed by architect William Wilkins, an English architect, classical scholar and archeologist, who also designed the National Gallery and University College London, and buildings for several Cambridge colleges.

The monument was constructed between 1817 and 1819, with funding raised by a local committee. The first custodian of the monument was a member of the crew of the HMS Victory from Norfolk who had helped carry Nelson below decks after he was shot. It is topped by six caryatid figures that support a figure of Britannia, which stands atop a globe inscribed with the motto from Nelson's coat of arms—*Palmam Que Meruit Ferat*

61. Personal correspondence by the authors with representatives of Historic England, London, 2017.

(“let him who has merited it take the palm”) and holds an olive branch and a trident. The monument is 144 feet tall and the top is reached by an interior stairs (Figure 23 and Figure 24).



Figure 23. Norfolk Naval Pillar (Nelson Monument), 1878. (Source: British Library Online Gallery, <http://www.bl.uk/onlinegallery/onlineex/earlyphotos/n/006zzz0010352a3u00005000.html>, excerpt of larger image)

Comparison to Perry’s Victory. The monument, similar to the later Perry’s Victory Memorial, used the columnar form to memorialize a heroic military figure. This monument, like the Perry’s Victory Memorial, is in the form of a Doric column.

Landscape Features. The Norfolk Naval Pillar is situated in surrounded by a roadway on a small plot in an industrial area. Stone and metal fencing surrounds a lawn that is immediately adjacent to the monument. Outside the fence, the area is largely paved.

Modifications for Accessibility. The structure was restored in 2005 and rededicated in August 2006. Based on research conducted for this study, no modifications have been made to provide for universal accessibility.



Figure 24. Norfolk Naval Pillar, undated image. (Source: NelsonsMonument.org.uk, accessed May 2017)

Brock’s Monument

Brock’s Monument is located in the Queenston Heights National Historic Site in Queenston, Ontario, approximately six miles north of Niagara Falls. The monument is located on the site of the Battle of Queenston Heights, the first major battle in the War of 1812, near the Canadian–United States border. Maj. Gen. Sir Isaac Brock, who served as the Lieutenant Governor of Upper Canada, was killed in the battle, which the British won.

A monument in Brock’s honor was erected in 1824. The remains of Brock and his aide-de-camp, Lt. Col. John Macdonell, were buried at the base of the monument. The original monument, designed by architect Francis Hall, consisted of a 126-foot-tall stone shaft centered on a 20-foot-square plaza, overlooking Fort Grey.⁶²

The original monument was heavily damaged in 1840 when a group of anti-government rebels, led by Benjamin Lett, set off explosives at the base of

62. De Veaux, S., *The Traveller’s Own Book to Saratoga Springs, Niagara Falls and Cansda*, fourth edition. (Buffalo: Faxon & Read, 1843), 233–234.

the structure.⁶³ Construction of a new monument began in 1853, with architect William Thomas (circa 1799–1860) receiving the commission for the memorial. Thomas was an English-born architect, who later practiced in Canada. Having served as an apprentice to a local carpenter and joiner in his youth, Thomas moved to Leamington in 1832, where he began designed buildings for clients and also working as a building speculator. During his career in England, Thomas largely designed middle class housing, as well as a number of churches, commercial buildings, and bridges.⁶⁴

In 1843, Thomas and his family moved to Toronto, where he opened an architectural office. In 1844 he received his first commission, a Greek Revival bank in central Toronto. With a prolific practice in Toronto, Thomas designed a number of churches and public buildings, including St. Lawrence Hall in Toronto (1850), a Renaissance Revival meeting hall, and St. Michael's Roman Catholic Cathedral in Toronto (1848), which is designed to be a nineteenth century interpretation of a English Gothic style church. William Thomas died in 1860.⁶⁵

The new Brock's Monument, 185 feet tall and constructed of Queenston limestone, was completed in 1859. It consists of a column sitting on a square base, centered on a raised grass-covered terrace, rectangular in plan, with stylized statues of soldiers set on stone bases at each corner (Figure 25). The stone at the base of the monument is rusticated. A stone lion sits at each corner atop the base. The stone column is topped by a statue of Brock. Instead of using a classical order derived from antiquity for the design of the column, Thomas created a unique order for the monument.



Figure 25. Brock's Monument, 1890. (Source: Library of Congress)

Comparison to Perry's Victory. Brock's Monument resembles the other Neoclassical monuments discussed in that it consists of a column topped by a statue, set on a base within a plaza. These monuments, as well as the ancient structures that influenced them, likely served as inspiration to the later Perry's Victory Memorial. Like Perry's Victory Memorial, Brock's Monument also commemorates an important figure from the War of 1812 (Figure 26).

63. Ibid., 235.

64. William Thomas. *Dictionary of Canadian Biography*, http://www.biographi.ca/en/bio/thomas_william_8E.html, accessed 2017.

65. Ibid.



Figure 26. Brock's Monument, present day. (Source: Niagara Parks)

Landscape Features. Brock's Monument is located in the Queenston Heights National Historic Site in Queenston, Ontario. The monument is sited on a grass-covered terrace surrounded by a stone knee wall. An opening at the east side of the wall allows passage into the monument via a stone-paved path. Two trees flank the path between the stone wall and the monument. A concrete-paved path encircles the monument. The monument and adjacent concrete path are raised slightly from the surrounding landscape. A series of stone steps at the east and north sides of the landscape correspond with stone-paved pathways on axis with the monument. The north pathway leads to a stone paved terrace situated at the top of a hill. The east path leads toward a small fountain, at which point the path splits, encircling the fountain, before continuing east as a single path. The path terminates at a set of stairs that lead down to a circle drive.

The landscape immediately adjacent to the monument consists of a mowed lawn, with a

number of trees planted nearby, particularly to the south and west.

Modifications for Accessibility. No changes have been made to Brock's Monument to provide universal accessibility or to modify the paving at the approach or base of the monument.⁶⁶

Chalmette Monument

On December 24, 1814, Great Britain and the United States signed a treaty in Ghent, Belgium, which ended the War of 1812. However, news of the treaty's ratification was not immediately received in North America, and on January 8, 1815, a further battle took place. In the Battle of New Orleans, Andrew Jackson and a force of ill-assorted militia fighters, frontiersmen, slaves, and Native Americans withstood an assault by a superior British force, inflicting significant casualties and ending British plans for an invasion of the American frontier.

The battle occurred five miles south of New Orleans along the Mississippi River, an area that became known as Chalmette Battlefield. In 1855, the State of Louisiana acquired the property and began construction of the Chalmette Monument, an Egyptian Revival obelisk. The project was left uncompleted for several decades due to lack of funding. In 1893, the Louisiana Society of the United States Daughters of 1776 and 1812 took control of the property and sought to secure funding and complete the monument.⁶⁷

In 1908, the 100-foot-tall stone obelisk was completed, with an interior spiral staircase leading to the top.⁶⁸ A door with a pyramidal surround is located at the southwest elevation at the base of the obelisk. The surrounds are also present at the other elevations, but without doors. The obelisk

66. Based on research conducted by the authors, 2017. Queries by the authors to Parks Canada did not result in further information on this question.

67. Lance Hatton, Jean Lafitte National Historic Park and Preserve, "Chalmette National Historical Park (Battle of New Orleans)," *Hallowed Ground* magazine, summer 2016.

68. Kevin Risk, *Chalmette Battlefield and Chalmette National Cemetery: Cultural Landscape Report* (National Park Service, Cultural Resources Stewardship Division, Southeast Regional Office, 1999).

sits atop stairs that extend around the base of the entire structure (Figure 27).⁶⁹



Figure 27. Chalmette Monument, circa 1910. (Source: Library of Congress)

The Chalmette Battlefield and National Cemetery are now part of the Jean Lafitte National Historic Park and Preserve.

Comparison to Perry's Victory. While similar in concept to the vertical shaft form of the Perry's Victory Memorial, the Chalmette Monument is clearly influenced by ancient Egyptian obelisks rather than Greek Classical designs. The pyramidal stone surrounds at the doors, slightly tapered walls, and pyramidal roof are all reminiscent of ancient Egyptian obelisks (Figure 28).



Figure 28. Chalmette Monument, Jean Lafitte National Historic Park and Preserve. (Source: National Park Service)

Landscape Features. The Chalmette Monument is situated on axis with a paved road that extends southwest into the national historic site from the main road to the north. The monument is located at the end of the road, which encircles the structure. The area between the paved road and the monument is covered with grass. A narrow concrete walk follows the outline of the paved road and is connected to the monument with a concrete-paved walk located to the southwest of the monument. The surrounding landscape is largely flat and covered with a mown grass lawn. The area to the west is heavily wooded.

Modifications for Accessibility. No changes have been made to the Chalmette Monument to provide universal accessibility or to modify the paving at the approach or base of the monument.⁷⁰

69. Ibid.

70. Based on research conducted by the authors, 2017, and correspondence with the National Park Service.

Battle Monument at the U.S. Military Academy, West Point

Located at the United States Military Academy in West Point, New York, the Battle Monument was erected in 1898 to honor the men of the regular army of the United States who were killed in battle during the Civil War.⁷¹ Plans for the monument were made as early as 1863, when officers stationed at West Point sought to erect a monument to commemorate their fellow officers who had lost their lives during the war. Trophy Point was dedicated as the site of the monument on June 15, 1864.⁷² In 1890, a design competition was announced, with the following firms invited to participate: Babb, Cook & Willard; Carrere & Hastings; McKim, Mead & White; and R. W. Emerson.⁷³

McKim, Mead & White were selected to design the new monument. The following statement accompanied their design:

In preparing the design, we have most carefully considered the object of the monument and the site which it is occupy. We believe the monument should be first and foremost a martial one, distinctive in its character and impressive in its design. The beauty of its site and the surroundings seems to us to preclude any bulky or massive treatment, and to suggest rather a treatment where the impression should be produced by height supported by a base which should not interfere with graceful and artistic treatment. For this reason we have adopted as the feature of our design a single monolithic shaft treated in the shape of a memorial column, or column of victory. This form seems to us to be more distinctively martial than any other, and in this form we believe it is possible to obtain impressiveness and dignity without a sacrifice of grace, at the same time preserving a distinctively architectural and monumental character. We lay great stress upon these two points, viz.: the necessity of giving the monument a martial character, and the relation of the monument to its site. In our design we have had these two points continually in mind, with results which you must judge. The shaft is a monolith of polished granite forty-six feet high and five feet

six inches in diameter. To the best of our belief, it would be the largest polished shaft in the world. It is proposed to surmount it with a figure of Victory, and surround it by eagles a distinct mark of its national character. The shaft rests upon a circular base, surrounded by flights of steps, giving the greatest breadth and dignity possible to the base. The materials are the most enduring granite and bronze. We have received an estimate from the most reliable firm known to us upon this monument which comes within the amount available. We submit with this statement a memorandum specification and copy of this bid.⁷⁴

The architects selected a new site, just east of Trophy Point, which was highly visible from the Hudson River (Figure 29). The monument was completed in 1896 and formally dedicated in May 1897.⁷⁵

Comparison to Perry's Victory. Like many of the other monuments discussed dating to the nineteenth century, the Battle Monument consists of a column placed on a square base, with a statue on top of the column. The Battle Monument, like the Prison Ship Martyrs Monument, was designed by McKim, Mead, and White, and, along with other monuments, were likely known to and influenced the designers Perry's Victory Memorial, which also utilized the columnar form.

Landscape Features. The West Point Battle Monument is situated at Trophy Point on the campus of the United States Military Academy at West Point (Figure 30). The monument overlooks the Hudson River, which is visible to the north, and is located directly north of Washington Road atop a raised terrace. The terrace, which is circular in shape, is encircled with a stair and eight granite pedestals, each topped with granite balls and two copper cannons. The stairs lead to the raised terrace from a paved walk at grade which surrounds the terrace.

71. Charles W. Larned, *History of the Battle Monument at West Point*. (West Point, New York: Battle Monument Association, December 1898), 1–3.

72. *Ibid.*, 18–21.

73. *Ibid.*, 68–72.

74. *Ibid.*, 74–75.

75. *Ibid.*, 78.



Figure 29. The Battle Monument at West Point, 1895. (Source: Library of Congress)

Views of the Hudson River are afforded from the north side of the monument, while the path at the base of the terrace connects to an asphalt-paved path that leads down the hillside to an amphitheater below. At the south side of the monument, the grade-level path connects to the paved sidewalk that runs along Washington Road. A statue of Gen. John Sedgwick, which is on axis with the Battle Monument, is located to the south across Washington Road.

Modifications for Accessibility. No changes have been made to the Battle Monument to provide universal accessibility or to modify the paving at the approach or base of the monument.⁷⁶

76. Based on research conducted by the authors, 2017. Queries by the authors to West Point Military Academy did not result in further information on this question.



Figure 30. The Battle Monument at West Point Military Academy. (Source: Foundations of America)

Prison Ship Martyrs Monument

The Prison Ship Martyrs Monument is located in Fort Greene Park in the borough of Brooklyn in New York City. The park sits on the site of Fort Greene, which was extant from 1814 to 1850. Washington Park, the first park in Brooklyn, occupied the site beginning in 1850. Landscape architects Frederick Law Olmsted and Calvert Vaux, who were designing the new Prospect Park in Brooklyn, were engaged by the City in 1867 to redesign Washington Park. The park would be renamed Fort Greene Park in 1897.⁷⁷ As part of this work, Olmsted and Vaux designed a vault to house the remains of more than 10,000 men—captured soldiers, sailors, and private citizens, who were held by the British as prisoners of war—who died on British prison ships during the Revolutionary War. When prison space became

77. *An Architectural Guidebook to Brooklyn*, 168–169.

scarce, the prisoners were housed in decommissioned and damaged ships in Wallabout Bay, off the northwest shore of Brooklyn.⁷⁸

The prisoners' remains were previously interred at a site near the Brooklyn Navy Yard at Wallabout Bay. Olmsted and Vaux designed a Gothic monument in the park to commemorate those to be interred at the site at Washington Park. The remains of the prisoners were moved to a new vault at the park in 1873; however, the Olmsted and Vaux-designed monument for that site was never built.⁷⁹

In the late nineteenth century, funds were raised to erect a monument at the park. In 1905, architect Stanford White of the firm McKim, Mead & White was commissioned to design alterations to the park, which included the design of a monument to honor those whose remains were interred at the park. White's design included a new entrance to the burial vault and a stairs leading to a plaza at the top of a hill, where the new monument would be erected (Figure 32). McKim, Mead & White were designing alterations to nearby Prospect Park at this time.⁸⁰

The monument consists of a granite stairway, 80 feet wide, with 100 steps divided by two terraces, leading to the plaza. The plaza is 250 feet square, rectangular in plan, and with a granite posts at each of the four corners, topped by bronze eagles. At the center of the plaza is the monument, a 143-foot-tall granite Doric column topped by a 22-foot-tall bronze lantern in the form of an urn. Lights at the top of the urn light up the top of the monument. The column sits directly on the plaza, not on a base, which would typically be present at a Classical column.

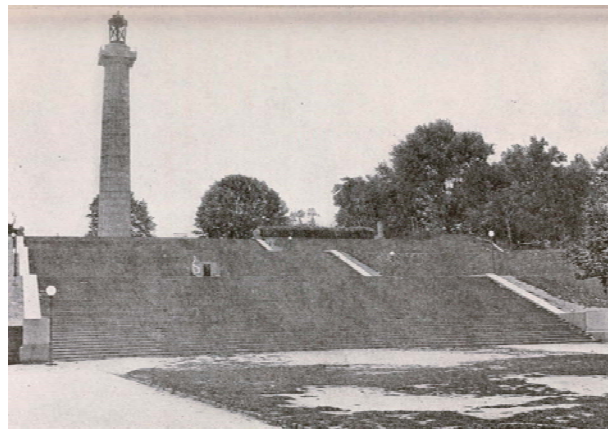


Figure 31. Prison Ship Martyrs Monument, Fort Greene Park, Brooklyn, New York, 1912. (Source: Library of Congress, from William F. Adams, *Commodore Joshua Barney: many interesting facts connected with the life of Commodore Joshua Barney . . .*.)



Figure 32. Prison Ship Martyrs Monument, undated, likely circa 1940s. (Source: The New York Public Library Digital Collections)

78. "The Monument," Prison Ship Martyrs Association, <http://www.prisonshipmartyrs.com/monument.html>, accessed 2017.

79. "Fort Greene Park, Prison Ship Martyrs Monument," <https://www.nycgovparks.org/parks/fort-greene-park/monuments/1222>

80. *An Architectural Guidebook to Brooklyn*, 168.

The lantern and eagles were created by sculptor Adolph Alexander Weinman.⁸¹ A staircase and elevator originally led to the observation deck at the top of the column. The monument was dedicated on November 14, 1908 (Figure 31).⁸²

The designer of the Prison Ship Martyrs Monument, Stanford White, had no formal training in the field of architecture. In 1863, at the age of nineteen, White began work as a draftsman in the office of Gambrill & Richardson in New York. White served as chief assistant to Henry Hobson Richardson, while developing his design skills. While at the firm, White assisted Richardson with work on the New York State Capitol in Albany and Trinity Church in Boston.⁸³

White left Richardson's firm in 1878 for an extended visit to Europe. While in France, White met architect Charles McKim. The two subsequently travelled through southern France and Spain together. Upon returning to New York in 1880, McKim invited White to join him and William Mead in forming a new architectural firm: McKim, Mead & White.⁸⁴

Many residential designs by the firm of McKim, Mead & White utilized the Shingle style, particularly well-suited to large homes for wealthy owners along the New England coast. However, in its commissions for larger public structures and memorials, and with the influence of the World's Columbia Exposition and the Beaux Arts style, the firm's designs increasingly reflected Neoclassicism toward the end of the nineteenth century. Stanford White was responsible for the design of a number of buildings for the firm that referenced Neoclassical ideas or other architectural sources of antiquity, including Washington Square Arch in New York (1892), a marble-clad triumphal arch honoring George Washington; the Gould Memorial Library at New York University (1899, now owned by Bronx Community College), a

monumental structure modeled after the Pantheon in Rome; and the second Madison Square Garden in New York (1890), an arena with a 300-foot-tall tower modeled after the Giralda, the bell tower of Seville Cathedral in Seville, Spain.⁸⁵ White also designed the Battle Monument at West Point, discussed above. In 1906 at Madison Square Garden, White was shot and killed by Harry K. Thaw, the heir to a mine and railroad fortune, in a dispute over Thaw's wife, model and actress Evelyn Nesbit.



Figure 33. Prison Ship Martyrs Monument. (Source: New York City Parks)

Comparison to Perry's Victory. The Prison Ship Martyrs Monument appears to have strongly influenced the design of Perry's Victory Memorial, as the two structures are nearly identical. Like Perry's Victory, the Prison Ship Martyrs Monument consists of a Doric column centered in a raised plaza accessed by a series of stairs and

81. Weinman, a native of Germany, was a frequent collaborator with McKim, Mead, and White. He also worked with Olin Levi earner, Augustus Saint-Gaudens, Daniel Chester French, and Charles Henry Niehaus.

82. *An Architectural Guide to Brooklyn*, 168.

83. Withey and Withey, 652–653.

84. Ibid.

85. Ibid.

terraces. Additionally, the Doric column at the Prison Ship Martyrs Monument, like Perry's Victory, has no base; instead, both columns sit directly on their plazas. The plazas combined with the monumental stairs that lead to each column serve as sort of a base for each monument. Both structures are also topped by bronze urns. Although much more elevated from its surroundings given its siting on a hill, the overall design concept, scale, configuration, and style of the Prison Ship Martyrs Monument is similar and clearly an influence on Perry's Victory.⁸⁶

Landscape Features. The Prison Ship Martyrs Monument is situated in Fort Greene Park in Brooklyn, New York. The monument is sited on axis with the corner of Myrtle Avenue and St. Edwards Street, at the northwest corner of the park. A wide walk extends from northwest corner of the park to a series of paved terraces and stairs that lead to the top of the hill on which the monument sits. A series of trees line each of the terraces. At the top of the hill, a large paved terrace surrounds the monument, which is raised above the terrace. The concrete-paved terraces includes brick accent paving. Stairs lead to the monument from the terrace on the northeast and southwest sides of the monument. Areas of grass with trees are present in the terraces on the northeast, southeast, and southwest sides of the monument. The landscape around the monument consists of trees and mown grass lawns. A series of winding paths that travel through the park connect with the tiered terraces.

Modifications for Accessibility. No changes have been made to the Prison Ship Martyrs

Monument to provide universal accessibility or to modify paving.⁸⁷

Lincoln Memorial

In 1900, the Senate Park Commission was formed by Senator James McMillan of Michigan in anticipation of the centennial of the founding of Washington, D.C. The commission, which included Frederick Law Olmsted, Jr., Augustus Saint-Gaudens, Daniel Burnham, and Charles McKim, released a plan in 1902 calling for a memorial in honor of Abraham Lincoln to be erected in line with the United States Capitol and Washington Monument and along the edge of the Potomac River.⁸⁸

Congress passed legislation in 1911 creating the Lincoln Memorial Commission to advise on the location and construction of a memorial in honor of Abraham Lincoln. Additionally, Congress appropriated \$2,000,000 to fund construction of the memorial. President Taft chaired the new commission, which consisted of current and former members of the Senate and House of Representatives. One of the first tasks undertaken by the commission was to seek advice regarding the a site for the memorial from the Fine Arts Commission, which at that time consisted of Daniel Burnham, Thomas Hastings, Cass Gilbert, Daniel Chester French, Charles Moore, Francis D. Millet, Frederick Law Olmsted, Jr., and Col. Spencer Cosby. In response, the Fine Arts Commission referenced the Senate Park Commission Plan, stating that the site

86. Specific documentation, such as correspondence, has not yet been identified documenting that Freedlander and Seymour were referencing the Prison Ship Martyrs Monument in their design; however, it seems very likely that they were aware of it.

87. Personal correspondence by the authors with representatives of the New York Landmarks Commission and the local preservation community, 2017. Based on research conducted by the authors, 2017. Queries by the authors to the New York City Parks and Recreation Department did not result in further information on this question.

88. Henry H. Saylor, "The Lincoln and Perry Memorials." *The World's Work: A History of Our Time*, Walter Hines Page, ed. (Garden City, New York: Doubleday, Page & Company) 1912, 94–95.

recommended in the plan would be the best location for the new memorial.⁸⁹

The Fine Arts Commission subsequently suggested that architect Henry Bacon be considered to carry out the design of the new memorial. Henry Bacon attended the University of Illinois for a year before leaving to start a career in architecture. Bacon soon joined the firm of McKim, Mead & White, where he won the Rotch Traveling Scholarship, which allowed him to travel and study through Europe for two years. Bacon returned to McKim, Mead & White in 1891, following the conclusion of his travels, and remained there until 1897, when he and James Brite partnered to form the firm of Brite & Bacon. Bacon opened an independent practice in 1902 and designed a number of public and commercial buildings, and monuments, including the General Hooker Monument in front of the State House in Boston and the Alice Freeman Palmer Memorial at Wellesley College.⁹⁰

For the Lincoln Memorial, Bacon proposed a structure modeled after the Parthenon that consists of a memorial hall, 60 feet by 135 feet in plan, enclosed by a colonnade (Figure 34). A statue of Lincoln, created by Daniel Chester French, is located at the center of the memorial hall. The colonnade consists of thirty-six Doric columns, 40 feet in height. The memorial sits on a 168 feet by 231 feet granite base. A series of steps and terraces lead to the base of the memorial, raising it to the same level as the base of the nearby Washington Monument. The memorial is constructed of white marble. A reflecting pool was designed to stretch from the Lincoln Memorial east toward the Washington Monument, with a new bridge to the west connecting Washington, D.C., with Arlington, Virginia.⁹¹ The memorial was dedicated in 1923.



Figure 34. A drawing of the proposed Lincoln Memorial, 1912. (Source: National Archives)



Figure 35. The Lincoln Memorial, 1976. (Source: Historic American Building Survey, HABS DC-3-2)

Comparison to Perry's Victory. While the Lincoln Memorial and Perry's Victory memorial took different forms, aspects of both of their designs are similar and characteristic of the Beaux Arts style. The stairs and terraces leading up to the main memorial structures are also similar. It is interesting that the two memorials were compared to one another during construction, as having successfully interpreted the same classical sources (Figure 35).

Landscape Features. The Lincoln Memorial is located at the western edge of the National Mall. A series of raised terraces and monumental stairs connect the monument with the mall. The north and south sides of the terrace are lined with shrubbery. Universally accessible pathways on both sides of the terrace lead to the space below the memorial. The monument is located at the

89. Ibid., 95.

90. Withey and Withey, 28–29.

91. Saylor, 95–96.

center of Lincoln Memorial Circle, a multi-lane paved road. On the east side of the memorial, the circle drive has been closed to automobile traffic and is paved with stone. A paved concrete walk extends along the inside edge of the circle drive. The area between the memorial and the circle drive is slightly raised, with a low stone wall running along much of the concrete walk. A mown grass lawn characterizes much of the area between the memorial and the circle drive. Trees and bushes are present at the base of the memorial, particularly at the north and south sides.

Modifications for Accessibility. Limited changes have been made to the Lincoln Memorial in terms of accessibility, including modifications to the handrails at the steps. Plans have been developed to adjust the grade of pavement leading the memorial, but have not yet been funded or implemented.⁹²

Montfaucon Monument

Montfaucon Monument commemorates the extraordinary victory of the American Expeditionary Forces and its allies in the forty-seven-day-long Meuse-Argonne Offensive, from September 26 to November 11, 1918. It is located on the Butte of Montfaucon near Montfaucon-d'Argonne, France.

The monument was constructed between 1929 and 1933 under the auspices of the American Battle Monuments Commission.⁹³ It is the primary monument recognizing the service of American forces during World War I, and is located in the area of the battle that led to the Armistice and Allied Victory (Figure 36).

The Montfaucon Monument was part of a larger program of commemoration created by the Monuments Commission, led by Chairman

General John J. Pershing and Consulting Architect Paul Philippe Cret. As with the Perry's Victory and International Peace Memorial, the U.S.

Commission of Fine Arts had an important role in the design of the Montfaucon Monument. The Commission of Fine Arts, which favored classically inspired motifs as a symbol of federal authority, was given final design approval. The Monument Commission selected John Russell Pope, an architect well-versed in Beaux Arts tradition, to design a monument that would be an American symbol abroad. Pope, who had studied at the Ecole des Beaux-Arts and travelled in Italy, used classical motifs in his design but as with his other commissions, sought to create an American version of classicism.

The Monuments Commission used classically inspired architectural forms to commemorate American victories during the war, selecting a column as a symbol appropriate since antiquity to honor military achievements. The Montfaucon Monument is a 180-foot-tall Doric column surmounted by a figure of Columbia. The monument's observation platform provides views of the surrounding battlefield, and the column itself is an identifiable component of the commemorative landscape (Figure 37).⁹⁴

92. Personal correspondence by the authors with representatives of the National Park Service, Washington, D.C., 2017.

93. The American Battle Monuments Commission owns and maintains the monument on property leased in perpetuity from the French government.

94. Steven McLeod Bedford, *John Russell Pope, Architecture of Empire* (New York: Rizzoli International Publications, 1998).



Figure 36. Design drawing of Montfaucon Monument, 1926. (Source: National Archives)



Figure 37. Montfaucon Monument. (Source: American Battlefield Monuments Commission, [https:// www.abmc.gov](https://www.abmc.gov))

Comparison to Perry's Victory. The Montfaucon Monument, like Perry's Victory, consists of a monumental stone-clad Doric column centered in a raised plaza accessed by a series of stairs and terraces. Unlike Perry's Victory, which is topped by a bronze urn, the Montfaucon Monument is surmounted by a stone figure of Columbia. Similar to Perry's Victory, the terraces are surrounded by grassy lawn with trees, and a road runs past the base of the stairs and terraces, with parking provided at the same location.

Landscape Features. The Montfaucon Monument sits atop a series of tiered terraces and steps that lead to the monument from the road. The paved road that passes to the south of the monument widens at the foot of the tiered terraces, creating a parking area. The landscape around the monument consists of rows of trimmed shrubs that line the terraces, with trees planted on either side.

Modifications for Accessibility. No changes have been made to the Montfaucon Monument to provide universal accessibility or to modify the paving at the approach or base of the monument.⁹⁵

San Jacinto Monument

The San Jacinto Monument is located in the San Jacinto Battleground State Historical Park, approximately 22 miles east of downtown Houston. The monument sits on the site of the Battle of San Jacinto, which occurred on April 21, 1836, and resulted in Texas winning its independence from Mexico. The Republic of Texas had declared independence from Mexico on March 2, 1836 and established an interim government. In response, General Antonio López de Santa Anna, the President of Mexico, led the Mexican army into southern Texas in an attempt to suppress the rebellion and remove the interim government that had been established at New Washington along Galveston Bay. On April 21, 1836, near the banks of Buffalo Bayou and the San Jacinto River, an army of 950 Texans led by General Sam Houston surprised the Mexican forces, which numbered approximately 1,500. The Battle of San Jacinto lasted approximately 20 minutes and resulted in the death of 630 members of Santa Anna's army, as well as the capture of Santa Anna.⁹⁶

In 1856, the Texas Veterans Association initiated a movement to secure the site of the Battle of San Jacinto as public land. By the end of the nineteenth

95. Personal correspondence by the authors with representatives of the National Park Service, 2017.

96. *Nomination of the San Jacinto Monument as a National Historic Civil Engineering Landmark.*

Houston Branch of the Texas Section, American Society of Civil Engineers. October, 1991.

century, the Daughters of the Republic of Texas had determined to erect a monument at the site. The San Jacinto Battleground State Historical Park was designated in 1907 to commemorate the Battle of San Jacinto. With the centennial of Texas independence approaching in 1936, the Daughters of the Republic of Texas led efforts to have funds allocated to construct the new monument. Construction funding was allocated as part of the Texas Centennial Celebration in 1936, and the San Jacinto Monument was constructed as a Public Works Administration project, with additional funding coming from the federal government.⁹⁷ The monument is not located on the original battleground.

Construction of the San Jacinto Monument began in 1936, with the groundbreaking taking place on April 21. The monument, dedicated in 1939, consists of a hollow, tapered shaft approximately 549 feet tall constructed of reinforced concrete faced with Texas Cordova shell stone (Figure 38). A 30-foot-tall, three-dimensional star, also constructed of reinforced concrete and clad with Texas Cordova shell stone, surmounts an 18-foot-tall pedestal that sits atop the shaft. A single-story museum building, octagonal in plan, surrounds the base of the shaft. Like the rest of the structure, the museum is constructed of reinforced concrete and faced with Texas Cordova shell stone. On the sides of the base of the shaft, and extending for approximately 58 feet above the museum roof, are eight frieze panels sculpted by artist William McVey. The panels depict scenes of the Texas Revolution. The shaft is fluted from above the frieze panels to the upper portion of the observatory windows near the top of the structure. The remaining areas of the shaft walls are flat.

The museum at the base of the shaft is surrounded by a two-level terrace, which is octagonal in plan. The terrace walls are constructed of reinforced concrete clad with Texas Cordova shell stone, while the terraces are paved with cast-in-place concrete with exposed aggregate. A series of monumental stairs lead from wide walks adjacent to the parking areas on grade to the lower terrace

on the north, south, and west elevations. Additional stairs lead to the upper plaza at the north, south, and west sides of the monument. A walled, unpaved amphitheater is present at the east side of the plaza.



Figure 38. Image from the cover of the program for the dedication of the San Jacinto Monument, 1939. (Source: San Jacinto Museum of History)

An accessibility ramp adjacent to the south stairs leads from the grade level approach walk to the lower terrace. A second ramp connects the lower terrace to the upper terrace. Both ramps are concrete-paved and have metal railings.

The monument was designed by Alfred C. Finn (1883–1964), a Houston architect well known for his Art Deco designs. Finn, a native Texan, was a prominent commercial architect in Houston during the 1920s. During this period Finn designed a number of office buildings throughout the city for businessman Jesse H. Jones. Examples include the Gulf Building (1929), with Kenneth Franzheim and J. E. R. Carpenter, which was the tallest building in Texas upon completion. In the 1930s,

97. Rosa Tod Hamner, "The San Jacinto Memorial," prepared for San Jacinto Chapter,

Daughters of the Republic of Texas, November 3, 1938.

Finn designed a number of public projects. Following Jones's appointment as U.S. Secretary of Commerce in 1940, Finn began work as an architectural supervisor for the Federal Housing Authority. Throughout his career, Finn largely designed buildings in the popular style of the day.⁹⁸

Comparison to Perry's Victory. The San Jacinto Monument, like Perry's Victory, consists of a monumental stone-clad shaft that is surrounded by a series of terraces and stairs providing access from the adjacent landscape and parking areas. While Perry's Victory is topped by a bronze urn, the San Jacinto Monument is surmounted by a stone-clad, reinforced concrete star. Unlike Perry's Victory, at San Jacinto Monument a museum extends outward from the perimeter of the shaft. Additionally, the shaft of the San Jacinto monument contains frieze panels near its base, while no such decorative features are present at the monumental shaft at Perry's Victory.

Landscape Features. The San Jacinto Monument is situated in San Jacinto Battleground State Historical Park. The monument is sited on axis with State of Texas Vista Road, which provides vehicular access to the monument from the south. The road divides immediately south of the monument, connecting to a loop road that encircles the base of the structure. Parking spaces line the loop road. A series of monumental stairs at the north, south, and west sides of the monument lead from the road up to the lower terrace. Mown grass lawns are present between the stairs, which are lined by bushes. An amphitheater consisting of a mown grass lawn is located at the east side of the monument. Trees serve as a buffer between the amphitheater and the loop road. A reflecting pool, approximately 1,770 feet long by 220 feet wide, extends west from the ring road. An asphalt-paved road leads from the loop road to the lower plaza

immediately south of the amphitheater. This road allows for vehicular access to the lower plaza.

Modifications for Accessibility. Two accessibility ramps have been added to the San Jacinto Monument (Figure 39). One accessibility ramp adjacent to the south stairs leads from the grade level approach walk to the lower terrace. A second ramp connects the lower terrace to the upper terrace, adjacent to the south stair between the two terraces. Both ramps are concrete-paved and have metal railings. The ramps are placed within the walls of the terraces, in what was likely once paved portions of the terraces.⁹⁹ It is not known exactly when the ramps were added to the monument, but they appear to have been constructed between 1978 and 1995.¹⁰⁰ An elevator, which is original to the structure, provides access to the observation deck.



Figure 39. An aerial view of the San Jacinto Monument. Note the accessibility ramps, indicated by yellow arrows. (Source: Texas Parks and Wildlife)

⁹⁸. Stephen Fox, "Finn, Alfred Charles," *Handbook of Texas Online*, <http://www.tshaonline.org/handbook/online/articles/ffi32>, accessed August 2017.

⁹⁹. A circa 1978 aerial image from the Texas General Land Office shows the paved plaza in locations the current ramps are located.

¹⁰⁰. The ramps are not present in a 1978 aerial image, but are visible in a 1995 USGS aerial image.

Closing

In 1914, as completion of the Perry's Victory Memorial neared, the journal *Stone* published an essay entitled, "A Great Granite Memorial," in which the new memorial was compared favorably with a recently complete military monument in Leipzig, Germany (Figure 40). The Monument to the Battle of the Nations, designed by Bruno Schmitz and constructed from 1898 through 1913, commemorated the 1813 Battle of the Nations in which the armies of Russia, Prussia, Austria, and Sweden defeated the French army led by Napoleon and supported by troops from Poland, Italy, and the Confederation of the Rhine. The massive, pyramidal monument, built at the site where Napoleon ordered the retreat of his army, featured rusticated granite and sandstone facades, and exterior and interior carved ornament including larger than life (31-foot-tall) figural sculptures.

The author comparing the Perry's Victory Memorial with the monument in Leipzig wrote:

Some months ago there was illustrated in these columns the colossal battle monument erected at Leipsic. This was typical of the new movement in German art and architecture. The most striking features of the memorial were the great figures, not applied ornament, like most sculpture, but carved in the solid masonry and forming a part of the structural work. Strictly speaking, the result could scarcely be called beautiful. The memorial was impressive because of its vastness and solidity, in the same way as our Bunker Hill and Washington monuments. Indeed, it may be said that nearly all colossal monumental structures from the days of the Pyramids and Sphinx to the present have made no pretense to beauty. The imagination of the designer seems to exhaust itself in the one element of size.¹⁰¹

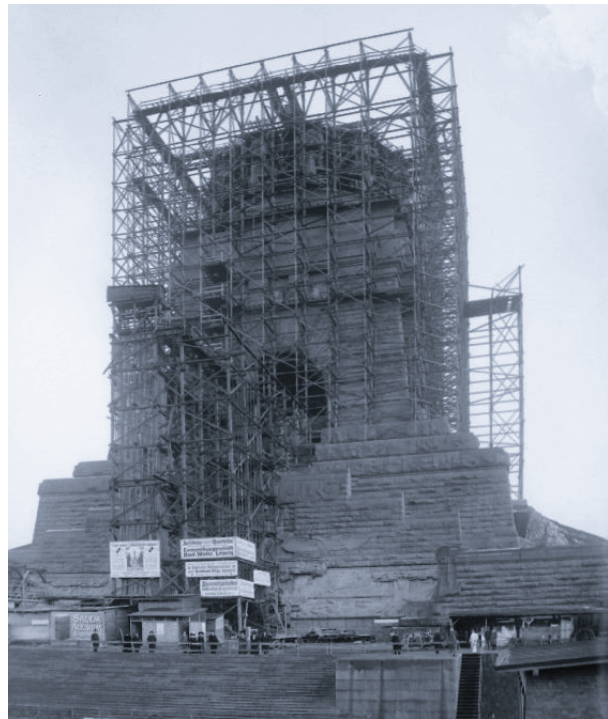


Figure 40. The Monument to the Battle of the Nations, in Leipzig, Germany, under construction, 1912. (Source: Stadtgeschichtliches Museum Leipzig, image F/2217/2004)

While architects in the United States continued to be influenced by the Beaux Arts style from 1880 through 1920, European architects outside of France often designed monuments in styles more reflective to national traditions and cultures. The Leipzig monument seems to have suffered, in the reviewer's eyes, from its reliance on non-Classical references. In comparing the two monuments, the author continued:

Of late years there has been noted in America a tendency toward big things in art and architecture and a very successful determination that magnitude shall not crowd out beauty. Undoubtedly a great impulse along this line has been given by our World Fairs, with their wonderful groupings of buildings and ornamental adjuncts and their vistas of landscape gardening. A permanent and valuable influence of these exhibitions is that they stimulated the imagination of our architects and gave them daring and originality.

A very striking illustration of this new American idea, as well as a remarkable contrast

101. "A Great Granite Memorial." *Stone* 35, no. 8, August 1914. Stone Publishing Company. 411-412.

to the Leipsic monument, is the Perry memorial, now in course of construction at Put-in-Bay, Ohio . . . While it naturally gains impressiveness from its magnitude, it has a beauty entirely independent of scale.¹⁰²

The author further drew a comparison with the Lincoln Memorial, in Washington, D.C., underway at the same time as Perry's Victory was being designed and constructed (Figure 41). He concluded:

The completion of this monument and the erection of the great Lincoln memorial in Potomac Park, Washington, will give this country two structures of a type that has been lacking in this country heretofore. What is more, they will stand comparison with anything of the kinds that the world has to offer. We believe that these will serve as a stimulus to more work of the kind, and that in a few years there will be nothing to match our monumental buildings unless we go to Ancient Greece.¹⁰³



Figure 41. Lincoln Memorial, 1923. (Source: Library of Congress)

As can be seen from the examples described above, Neoclassical influences and Beaux Arts references were exemplified by a variety of monuments created to commemorate military victories in the late nineteenth and early twentieth

centuries, in the United States as well as in Canada and Europe. Notable American architects and sculptors participated in the design of many of these public memorials. The designers of the Perry's Victory Memorial were certainly well informed about architectural movements of their day, schooled in the Beaux Arts tradition, and familiar with contemporary architectural publications.

It is also likely that Joseph Freedlander, who lived and worked in New York City, was aware of the design by Stanford White for the Prison Ship Martyrs Monument, to which the Perry's Victory Memorial bears a striking resemblance. Certainly, Freedlander would have been aware of McKim, Mead & White's work at the time. (It is possible, though seems unlikely, that Freedlander and Seymour arrived at the design for Perry's Victory entirely independently, without awareness of the similar monument recently constructed in New York City. Alternately, they may have had other architectural precedents in mind that are not documented in available archival documentation of their work on the memorial design.)

Many of the varied solutions proposed in the design competition for Perry's Victory Memorial exhibit certain similarities in style and form, in part due to the guidance afforded by the competition program. Regardless of its particular antecedents, however, Freedlander and Seymour's design for the memorial succeeded through the use of readily recognizable Neoclassical references, adherence to Beaux-Arts ideals, and respect for the criterion of the competition program—as well as responsiveness to the setting in relatively flat terrain, on an island nearly at sea level (Figure 42 and Figure 43).

102. Ibid.

103. Ibid.



Figure 42. Perry's Victory Memorial, 1922. (Source: PEVI archives)



Figure 43. Perry's Victory Memorial, undated (likely circa 1930s). Photographer, F. H. Haskett. (Source: PEVI archives, file 17-4-43, PEVI-MON, negative no. PV166)

The review of monuments provided in this comparative analysis helps to establish a historical and design context for Perry's Victory Memorial. Further assessment was conducted to determine whether these monuments have been modified to provide universal access to the base or the interior of the structure. This assessment revealed that very few of the monuments studied have been altered to provide enhanced access to the base of the structure, with the exception of the San Jacinto Monument, where access ramps have been provided. Where the monument interior was not readily accessible (e.g., by elevator) as part of original construction, and either contained only stairs or no means of direct access to the upper part of the structure, such access has also not been provided through later modifications. In reviewing this question with the stewards of several of the monuments discussed above, the reason typically cited for lack of alterations to provide universal access was the decision that such changes were considered too intrusive to the historic character and architectural integrity of the structure. Instead, enhanced interpretation and assisted access to the base or terrace were selected as alternative approaches.

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Appendix
Comparative Images



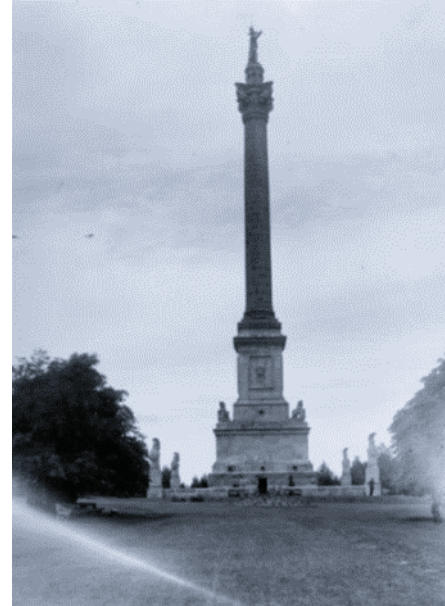
Norfolk Naval Pillar (Nelson Monument), Great Yarmouth, Norfolk, completed 1819. (Source: British Library Online Gallery, image dated 1878)



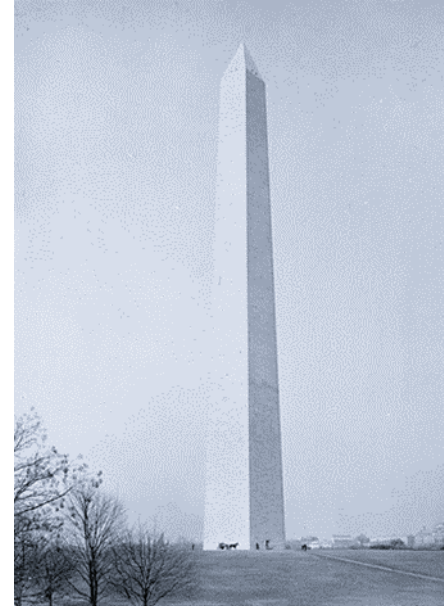
Washington Monument, Baltimore, completed 1829. (Source: Maryland Historical Society, image dated 1829)



Nelson's Column, London, completed 1843. (Source: National Archives of the UK, image dated 1949)



Brock's Monument, Queenston, Ontario, completed 1859. (Source: Library of Congress, image dated 1890)



Washington Monument, Washington, D.C., completed 1884. (Source: Library of Congress, image circa 1903)



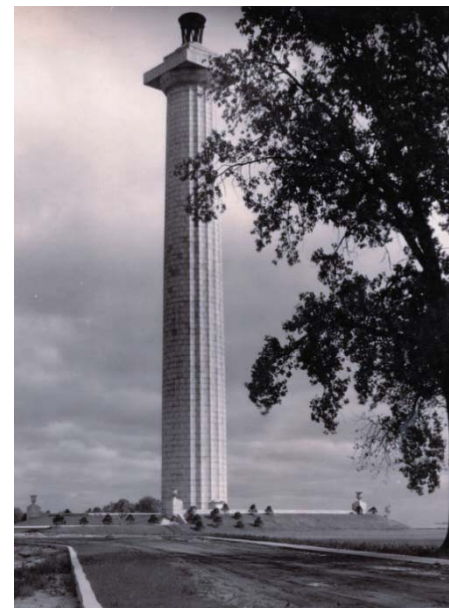
Battle Monument at the U.S. Military Academy, West Point, New York, completed 1896. (Source: Library of Congress, image dated 1895)



Chalmette Monument, Jean Lafitte National Historic Park and Preserve, Louisiana, completed 1908. (Source: Library of Congress, image circa 1910)



Prison Ship Martyrs Monument, Brooklyn, New York, completed 1908. (Source: The New York Public Library Digital Collections, image circa 1940s)



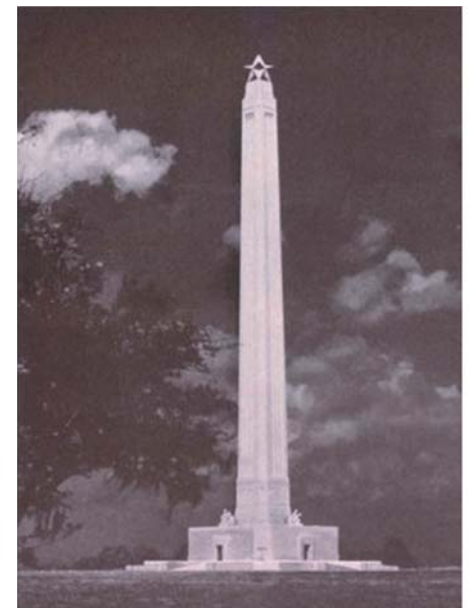
Perry's Victory Monument, Put-in-Bay, South Bass Island, Ohio, completed 1915. (Source: PEVI archives, file 17-4-43, PEVI-MON, negative no. PV166, image circa 1940s)



Lincoln Memorial, completed 1923. (Source: National Archives, image dated 1912)



Montfaucon Monument, near Montfaucon-d'Argonne, France, completed 1933. (Source: National Archives, image dated 1926.)



San Jacinto Monument, completed 1939. (Source: San Jacinto Museum of History, image dated 1939)

