

Executive Council:

- Robert Amberger
- Mary Bradford
- Phil Brueck
- Don Castleberry
- Maureen Finnerty
- Denny Huffman
- Abby Miller
- Becky Mills
- Doug Morris
- Bill Wade



**THE COALITION OF
NATIONAL PARK SERVICE
RETIREES**

Voices of Experience – Advocating Protection of America’s National Parks

SENT VIA FAX

April 29, 2008

The Honorable Dirk Kempthorne
Secretary of the Interior
1849 C Street NW
Washington DC 20242

Dear Secretary Kempthorne:

I am writing on behalf of our members and former Interior officials to express our thanks to you and Director Mary Bomar for what we understand is your recent decision to decline the Memorandum of Understanding offered by the American Revolution Center, and for the Park Service's recent written responses to Representative Todd Tiahrt expressing the National Park Service's opposition to the scope and scale of the ARC development at Valley Forge National Historical Park. We also are writing to express our concern about political pressure we understand has been applied by ARC to the Department and the NPS to accept that ill-advised and damaging development within such a nationally significant park.

During Congressional hearings leading up to the establishment of Valley Forge as a unit of the National Park System in 1976, the National Park Service Director was advised that the Administration's official position did not favor the inclusion as Valley Forge was being adequately managed by the State Park System. The NPS Director, Gary Everhardt opposed testifying in opposition knowing that Valley Forge contained superlative values warranting its establishment as a National Historical Park. After much discussion and negotiation with DOI officials Assistant Secretary Fish, Wildlife and Parks Nathaniel Reed became the official witness representing the Administration at the hearing and testified in support of inclusion of Valley Forge in the National Park System. President Gerald Ford was present at a Ceremony on July 4, 1976 and accepted Valley Forge as a unit of the National Park System.

About the proposed ARC development, Reed and Everhardt recently expressed to us the following: “What a tragedy - yet another proposal that tramps on the significance of the Valley Forge National Historical Park! When will the Congress acquire the inholdings and appropriate the necessary funds and allocate sufficient manpower for the National Park Service to bring to the American people and millions of visitors the importance of Valley Forge in our great struggle for independence.” They, along with former Regional Directors Jim Coleman and Marie Rust, both of whom oversaw VAFO and are intimately familiar with its values, further expressed, “We hope the current Department and NPS leadership unequivocally opposes the damaging aspects of the proposed development on this important piece of land and stand up to political pressures that would allow it to proceed.”

Along with these esteemed former stewards of the National Park System, we believe the proposed ARC development would be very damaging to the park in many ways. Not least is that having a museum where it is proposed would make it nearly impossible for the National Park Service to manage this park effectively for visitor education. ARC would play perhaps even a greater role in controlling the visitor experience than would the NPS. And the existence of such a major

5625 North Wilmot Road, Tucson, Arizona 85750-1216
Phone: 520-615-9417; FAX: 520-615-9474
EMAIL: bill_wade@npsretirees.org
WEBSITE: www.npsretirees.org

set of buildings within the boundaries of the park would obviously interfere with visitor experiences. We enclose a guest editorial by CNPSR Executive Council Chair Bill Wade recently published in the Philadelphia Inquirer.

Moreover, we have just read a guest editorial published in the Harrisburg newspaper by Professor Wayne Bodle, a scholar who we understand has spent 10 years studying original historical documents in the possession of the park. He writes in his editorial about the history of the part of Valley Forge National Historical Park where ARC intends to build its museum, conference center and hotel complex. Bodle's studies clearly dispute ARC's claim that there are no significant cultural resources on the parcel they propose to develop. In the face of this evidence and that in the General Management Plan for VAFO, we are stunned that ARC continues plans to build on such a historically significant site. The site plans show that construction would entail major earth movements, retaining walls, water collection basins, and major areas set aside for bus and automobile parking lots. Desecration of the cultural resources and context of this parcel would be a national outrage.

An interesting aside – possibly because of the growing “pushback” by the county chamber of commerce and its member hoteliers, the ARC no longer refers to a "hotel" it plans to build. However, its plan to build 99 rooms of lodging remains.

We are concerned that to date the National Park Service and the Department of the Interior have not taken more proactive steps to stop this project. We know the NPS expressed its concerns to ARC both privately, then publicly when its concerns remained unaddressed, and to the local township authorities who have the power to stop this project. But we also understand that the ARC and the local township majority have ignored those concerns and are moving ahead. We know that the NPS has the authority, under the NPS Organic Act and the “property clause” of the U.S. Constitution to stop the development, if it comes to that.

We believe you have the responsibility to protect Valley Forge National Historical Park. Congress made that responsibility clear in the 1916 Organic Act, directing the Secretary of the Interior to prevent the impairment of units of the National Park System:

“The Secretary has an absolute duty, which is not to be compromised, to fulfill the mandate of the 1916 Act to take whatever action and seek whatever relief as will safeguard the units of the National Park System.”

We would appreciate your advising us what steps you and the National Park Service plan to take to prevent the major adverse impacts this project will cause to this iconic national treasure.

Sincerely,



J. W. Wade
Chair, Executive Council

cc: Mary Bomar, Director, National Park Service

Attachment

5625 North Wilmot Road, Tucson, Arizona 85750-1216
Phone: 520-615-9417; FAX: 520-615-9474
EMAIL: bill_wade@npsretirees.org
WEBSITE: www.npsretirees.org

Two hundred and thirty years ago, Gen. George Washington and the Continental Army suffered, struggled, and ultimately persevered at Valley Forge in Pennsylvania. At the dedication of Valley Forge National Historical Park (NHP) in 1976, President Gerald R. Ford properly described Valley Forge by saying “Here the vein of iron in our national character was forged.” But now a private organization, the American Revolution Center, has proposed building an oversized, commercialized, museum complex inside the boundaries of the park—threatening the future of this important icon and potentially national parks across the country.

While the proponents are well-intentioned, this proposal merits a national outcry.

On July 4, 1976, on the Bicentennial of the Declaration of Independence, Congress established Valley Forge NHP “to preserve and commemorate for the people of the United States” the area associated with Gen. Washington’s encampment at Valley Forge in 1777-1778. The Continental Army encamped here after leaving their fortifications further to the south and before departing the area in June 1778 to engage and defeat the British Army at Monmouth, New Jersey. Congress properly acknowledged Valley Forge as “one of the major historical resources of our Nation.” In 1980, Congress expanded the park’s boundaries to include the parcel now in question specifically to protect it from development that was encroaching on the park.

Our country needs a museum to tell the story of the American Revolutionary War—but not one built right on top of the very history it seeks to protect and interpret. Many historians believe the land on which the museum complex would be built was part of George Washington’s commissary – an innovation at the time that helped end the troops’ starvation by regulating the dispersion of food and other supplies. Developing on land with great historical significance is simply inappropriate, and puts our national heritage at risk.

Such a development project within the boundaries of a national park, even on privately owned land, is certain to interfere with the National Park Service’s mandated responsibility to manage the park and the experience of visitors. For example, the museum complex as proposed would include a hotel, conference center, campground, and other incompatible development on land that is now enjoyed by park visitors. While nearby trails are used by those seeking solitude, quiet and natural surroundings, a group of buildings just above those trails will forever change the tranquil environment. Many visitors use the surrounding parkland for evening horseback riding and star gazing, but once built the complex will exude light 24-hours-a-day through its glass walls. Still others come to enjoy watching birds and other wildlife that use the wetlands near the parcel in question. Sediment from the large complex will inevitably damage the park’s sensitive wetlands and drive wildlife away.

When the Lower Providence Board of Supervisors voted in September to adopt a new zoning ordinance that would allow this outsized development on private land within Valley Forge, its members made a decision that affects each and every American—because our national parks belong to the nation as a whole. And so, the nation needs to join the local Pennsylvania residents who have been raising concerns about this development proposal.

What happens here will not only harm Valley Forge, it may also change the landscapes of national parks nationwide by sending a message that no place is sacred – not even a national shrine such as Valley Forge. There are approximately 5 million acres inside the boundaries of national parks nationwide that are not yet managed by the National Park Service, which means that similar outsized or poorly sited development projects could potentially be a reality throughout the park system—forever changing the national parks as we know them, and as they were intended to be protected.

I hope you will join hands with me and the Coalition of National Park Service Retirees, more than 640 former National Park Service employees, in urging the American Revolution Center to build its important museum at a location that historians and all Americans, here in Pennsylvania and across the country, can applaud without reservation.

5625 North Wilmot Road, Tucson, Arizona 85750-1216

Phone: 520-615-9417; FAX: 520-615-9474

EMAIL: bill_wade@npsretirees.org

WEBSITE: www.npsretirees.org