Comments from Consulting Parties

Comments

on

DOE

Hayman 1

Braswell, Aaron (FAA)

From: Michael <mhayman@iglou.com>
Sent: Friday, June 17, 2016 3:22 PM
To: Braswell, Aaron (FAA)
Subject: Comment on Bowman Field 106

Aaron,

Please acknowledge reception of this email.

The loss of 300 mature trees around Bowman Field is a permanent loss of canopy in a city that has the fastest growing heat island in the US according to Dr. Brian Stone, Georgia Tech University. Two for one smaller trees replaces about 1 percent of the canopy lost in the short term.

Long term, most replacement trees will not survive 50 years to maturity. Some homeowners opt not to take both replacement trees. The result is a severe and permanent loss that should be mitigated in neighborhoods and in Bowman Field itself.

Michael Hayman

Hayman 2

Braswell, Aaron (FAA)

From: Michael Hayman <mhayman@iglou.com>
Sent: Tuesday, June 21, 2016 1:24 PM
To: Braswell, Aaron (FAA)
Subject: Re: Comment on Bowman Field 106

Aaron, just to be clear, please add this to my comment. Thank you.

Bowman Field, the historic garden suburbs, and Olmsted-designed Seneca Park all have historic standing. All suffer loss that should be mitigated.

Consider this a formal objection to FAA's no adverse effects determination.

On Jun 21, 2016, at 10:16 AM, <Aaron.Braswell@faa.gov> <Aaron.Braswell@faa.gov> wrote:

Mr. Hayman,

Your comments have been received.

Thank you,

Aaron Braswell
Environmental Protection Specialist
Federal Aviation Administration
Memphis Airports District Office
2600 Thousand Oaks Boulevard
Suite 2250
Memphis, TN 38118
Phone: 901-322-8192

-----Original Message-----
From: Michael [mailto:mhayman@iglou.com]
Sent: Friday, June 17, 2016 3:22 PM
To: Braswell, Aaron (FAA)
Subject: Comment on Bowman Field 106

Aaron,

Please acknowledge reception of this email.

The loss of 300 mature trees around Bowman Field is a permanent loss of canopy in a city that has the fastest growing heat island in the US according to Dr. Brian Stone, Georgia Tech University. Two for one smaller trees replaces about 1 percent of the canopy lost in the short term.

KRC 1

Braswell, Aaron (FAA)

From:	Ky Resources Council <fitzkrc@aol.com>
Sent:	Monday, June 27, 2016 12:31 PM
To:	Braswell, Aaron (FAA)
Cc:	lebarras@gmail.com
Subject:	106 Review

Dear Aaron:

Regarding objections to the 106 review process for the Bowman Field Safety Program, KRC has previously endorsed the comments submitted by Angela Burton regarding inadequacies in the scope and analysis conducted. By this letter, I respectfully request that KRC be listed as endorsing as our own comments, those objections previously submitted by Plea For The Trees, Phyllis Hawkins, J. Chris McCoy, Michael Hayman, Angela Burton, Mimi Zinniel, President and CEO, Olmsted Parks Conservancy, Earl Jones, Chair, Olmsted Parks Conservancy Board (on behalf of the Board),and Seve Ghose, Metro Park.

Thank you very much.

Fitz

Tom FitzGerald
Director
Kentucky Resources Council, Inc.

Hawkins 1

Braswell, Aaron (FAA)

From:	Phyllis Hawkins <drphawkins28@gmail.com>
Sent:	Wednesday, June 22, 2016 5:04 PM
To:	Phillip Branden
Cc:	Braswell, Aaron (FAA); craig.potts@ky.gov
Subject:	Section 106 Comments due by 4 p.m.

June 22,2016

Aaron Braswell:

I disagree with and object to the FAA's determination of "no adverse effect" in the Section 106 process for the properties within the Area of Potential Effect. As I have stated before, the landscape has historic significance and the loss of hundreds of trees is an adverse effect to the setting.

Phyllis A Hawkins
2611 Kings Hwy
Louisville, KY 40205

McCoy 1

Braswell, Aaron (FAA)

From: Chris McCoy <j.chris.mccoy@gmail.com>
Sent: Thursday, June 23, 2016 3:34 PM
To: Braden, Phillip (FAA)
Cc: craig.potts@ky.gov; Braswell, Aaron (FAA)
Subject: Bowman Field - Section 106

Dear Mr. Braden:

Please accept this email as a formal objection to the FAA's "Determination of No Adverse Effect" under Section 106 of the National Historic Preservation Act for the undertaking at Bowman Field. Please find below a summary of my objections:

The finding fails to acknowledge that changes to the tree canopy of any of the neighborhoods near Bowman Field will adversely affect all nearby neighborhoods, irrespective of whether or not they are in the approach surfaces APE. Unacknowledged impacts include: a.) negative effect on the esthetic of the community at large, most of which is comprised of garden suburbs; b.) negative contribution to air quality from an increase in air traffic that will likely follow from Bowman Field's compliance with FAA standards; c.) an increase in noise that will accompany any increase in air traffic; d.) reduction in benefit of temperature amelioration provided by an existing tree canopy that will not be replicated by fulfillment of the proposed tree replanting program; e.) negative impact on property values from cumulative consequences of impacts above.

The finding fails to reflect the contribution to the Section 106 process of Dr. David Ames, whose expertise in the process is indisputable.

The finding has been achieved without legitimate consideration of any of the comments presented by consulting parties to the Section 106 process. Per the FAA's count, 76 separate comments were received from the consulting parties. Of these 76 comments, not a single one was considered of sufficient merit to effect any change to the CRE.

It is likely that the vast majority of residents in the neighborhoods surrounding Bowman Field would not want to see conditions imposed on the airport so detrimental to its operations that its viability would be in jeopardy, but those same residents do not want to see changes to the airport or its environs that would diminish property values or their quality of life. A determination of "No Adverse Effect" represents an unfortunate abandonment of the opportunity to find a balance between the interests of the airport and the interests of the surrounding communities.

Please acknowledge your receipt of this email.

Chris McCoy

Barras 1

Braswell, Aaron (FAA)

From:	Leslie Barras <lebarras@gmail.com>
Sent:	Friday, June 24, 2016 3:52 PM
To:	Braden, Phillip (FAA)
Cc:	Jennifer Ryall, KHC; Potts, Craig A. (Heritage Council); Braswell, Aaron (FAA); Dupree, Tommy (FAA)
Subject:	PFTT - Bowman Field NAE Disagreement Submittal
Attachments:	PFTT Objection to BFSP NAE determination_062416.pdf

Mr. Braden -

I have attached Plea For The Trees formal written disagreement with the FAA's no adverse effect findings in the Bowman Field Safety Program Section 106 consultation. These are also being sent via certified mail.

Would you acknowledge your receipt of this email?

Thank you,
Leslie Barras

Barras 2

PLEA for the TREES

June 24, 2016

Sent via email to Phillip.Braden@faa.gov and certified mail 7016 0910 0000 7559 4532

Mr. Phillip Braden
Manager, Memphis Airports District Office
Federal Aviation Administration
2600 Thousand Oaks Blvd., Suite 2250
Memphis, TN 38118-2482

RE: Bowman Field Safety Program; Louisville, KY
Written Disagreement with "No Adverse Effect" Determination; 36 CFR § 800.5(c)(2)(ii)

Dear Mr. Braden:

Plea For The Trees (PFTT) submits this written disagreement with the Federal Aviation Administration's (FAA) proposed finding of "no adverse effect" with respect to the Bowman Field Safety Program, for the reasons described below. This submittal constitutes a formal "disagreement with finding" pursuant to the regulations of the Advisory Council on Historic Preservation (Advisory Council) that implement Section 106 of the National Historic Preservation Act. In particular, this written submittal is provided pursuant to 36 Code of Federal Regulations (CFR) § 800.5(c)(2)(ii).

Summary

Plea For The Trees submits this written disagreement with the FAA's proposed no adverse effect findings for: **Seneca Park** (including the Golf Course and parkland along Pee Wee Reese Road), **Seneca Vista Historic District, McCoy Manor Historic District, Seneca Manor Historic District** (within the unevaluated City of Seneca Gardens), **Kingsley Historic District, Seneca Village Historic District**, and **Seneca Village No. 2 Historic District.**

Overview – Adverse Effects are Associated with the Type and Function of Trees Removed and Targeted for Removal

The FAA and LRAA fail to understand that the adverse effects to the historic landscapes are associated primarily with the types and function of trees lost and targeted for removal, and not the absolute number of trees lost in relation to the absolute number of trees in each affected area in the Bowman Field environs. This lack of understanding is particularly revealed in the FAA's "Section 106 Effects Determination," which states that "Replacement trees would provide coverage similar to trees being replaced." (p. 4.)

PFTT has compiled specific information on 176 trees permanently removed and planned for removal in the Bowman Field Safety Program through Open Records Act and Freedom of Information Act requests. This is an incomplete list because the LRAA has not provided the complete inventory of trees removed in the first quarter of 2016. Of the 176 trees for which we have data, **84 percent** are high-value native hardwoods and evergreens that have reached **90 feet or more in height or that, in maturity, would reach 90 feet or more in height.** These canopy trees include pin oak, red oak, willow oak, red maple, silver maple, sugar maple, black cherry, black walnut, American elm, ash, tulip poplar, yellow poplar, honey locust, gingko, hackberry, spruce, hemlock, and baldcypress. As explained in the report of Dr. David L. Ames submitted to you by Plea For The Trees in October 2015, these canopy native trees have ecological, social, and cultural functions unique to their species and size. Their loss will **never** be replaced or mitigated by plantings of low-canopy trees.

Representative photos of these trees are provided below. They include trees removed in the first quarter of 2016 from Seneca Vista, and examples of trees targeted for removal in Seneca Village, Seneca Manor, and Seneca Park. The statement that "Replacement trees would provide coverage similar to trees being replaced" is dispelled by the realities of the removal program; two dogwoods will never "provide coverage" similar to the trees below. Adverse effects ***will*** occur from the permanent removal of the mature tree canopy in these garden suburbs and Seneca Park.

In addition, seven (7) percent of the 176 trees are native hardwoods and evergreens that have a maturity height of between 50 and 90 feet, e.g., Southern magnolia, sweet-bay magnolia, linden, boxelder, black locust, American yellowwood, catalpa, and eastern white pine, or are native understory trees (less than 50 feet in height at maturity), e.g., dogwood, redbud, crabapple. Only six (6) percent of the 176 trees represent non-native or cultivar species, none of which reach canopy heights of 90 feet or more, e.g., arborvitae, Foster holly, Siberian elm, mulberry, and one Bradford pear.

Clearly, the trees permanently lost from these historic landscapes are high-value, high-canopy native hardwoods and evergreens and their loss is a permanent adverse effect. The loss of the mid-story native trees also contributes to the adverse effects.

Contested Determinations of Eligibility

The FAA's proposed findings of no adverse effect are based upon the agency's determinations regarding whether a number of properties within the limited Area of Potential Effect (APE) are eligible for listing in the National Register of Historic Places and the specific criteria and qualifying characteristics regarding eligibility. The report titled "Historic Architectural Survey for the Bowman Field Airport Area Safety Program," (Brockington, December 2014) is relied upon by FAA in its "Section 106 Effects Determination," and, consistent with your reference, is hereafter referred to as the "CRE" (Cultural Resource Evaluation).

As stated in your May 24, 2016 Determinations of Effect cover letter to the State Historic Preservation Officer (SHPO), the no adverse effects determination is "predicated" on the FAA's assessment that the trees are not a contributing element to the historic resources within the APE. We want to be clear that PFTT's and other consulting parties' opposition to the scope of FAA's Determinations of Eligibility remain, based upon the CRE's:

- Failure to recognize the ***landscapes and landscape design*** as a contributing element to eligibility under Criteria A and C for Seneca Park, Seneca Vista, McCoy Manor (a part of

the unevaluated City of Seneca Gardens), Seneca Manor, Kingsley, Seneca Village, and Seneca Village No. 2.

- Incorrect time periods of significance and failure to address levels of significance.
- Failure to include outparcels as contributing infill in the historic districts in which they were built.

In the absence of achieving a consensus on the Determinations of Eligibility in the Section 106 consultation process, the FAA should submit all contested determinations to the Keeper of the National Register of Historic Places pursuant to the procedures outlined in 36 CFR Part 63. PFTT, and any other consulting party, also has the option of bringing these contested determinations to the Keeper's attention (*see* 36 CFR § 63.2(c)), as well as the Advisory Council's (*see* 36 CFR §§ 800.9 and 800.11).

Specific Districts for which there are Contested No Adverse Effect Findings

As described in the Advisory Council regulations,

> [A]n adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. . . . Adverse effects may include reasonably foreseeable effects caused by the undertaking, be farther removed in distance or be cumulative.
>
> 36 CFR § 800.5(a)(1).

The regulation includes as an example of an adverse effect changes in a property's physical features within the property's setting that contribute to its historic significance. *Id.* at § 800.5(a)(2)(iv). The definition and examples form the basis for our position that the loss of mature tree canopies within the settings of Seneca Park and the historic residential districts are direct adverse effects and also cause visual adverse effects within each property and to surrounding historic districts.

The specific properties and districts upon which we disagree with your agency's proposed findings of no adverse effect are as follows and in the order they appear in the CRE:

(1) **Seneca Park** – The CRE addresses this resource in Section 3.4 (pp. 55-67), beginning with the following summary:

"Property Type: Golf Course
Period of Significance: 1933-1964 (pre re-design)
Architecture: Casual, organic landscape
General Integrity: Medium NRHP
Status: Eligible (Criteria A) Safety
Program Effect: No Adverse Effect"

Objections to the failure to evaluate Seneca Park in its entirety, and documentation regarding the National Register eligibility of the Park in its entirety (with an expanded period of significance) including its landscape, have been thoroughly documented in the administrative record previously. These submittals include, but are not limited to, Section 106 consulting party comments of PFTT (July 10, 2015), Metro Parks (July 9, 2015), the Olmsted Parks Conservancy (July 6, 2015), and Dr. David L. Ames (October 21, 2015), co-author of *National Register Bulletin, Historic Residential Suburbs: Guidelines for Evaluation and Documentation for the National Register of Historic Places*. (2002) Washington D.C.: U.S. Department of the Interior, National Park Service National Register History and Education.

The CRE concludes that "approximately 34 trees" would be removed, although it is not clear if this number includes the trees along Pee Wee Reese Road, the original "automotive concourse" of the Olmsted firm's plan. In addition to the direct loss, adverse visual effects will be experienced in Seneca Vista Historic District and Kingsley Historic District. Additionally, the LRAA has removed mature trees within the Park since at least the early 1990s and no Section 106 consultation was conducted whatsoever. The cumulative effects of these removals have not been addressed in the proposed no adverse effects finding.

(2) **Seneca Vista Neighborhood** - The CRE addresses this district in Section 3.5 (pp. 68-79), beginning with the following summary:

"Property Type: Early Automobile Suburb
Period of Significance: 1937-1950
Architecture: Mid-Twentieth Century (Largely Minimal Traditional; examples of Cape Cod and Colonial Revival)
General Integrity: Moderate
NRHP Status: Eligible (Criteria A, B, and C)
Safety Program Effect: No Adverse Effect"

Objections to the failure to recognize that the landscape contributes to the historic setting have been thoroughly documented in the administrative record previously, including comments submitted to your agency in July 2015 by PFTT, Angela Burton, Michael Hayman, Phyllis Hawkins, and Chris McCoy, as well as Dr. Ames' report referenced above.

Seneca Vista has borne the brunt of the Bowman Field Safety Program, both in terms of the tree removals already conducted in the first quarter of 2016 (and those planned following acquisition of avigation easements (an additional ten [10]) and the seven (7) trees along Pee Wee Reese Road/Seneca Park, essentially in the back yards of the Drayton Drive residents. No evaluation of effects has been made for the fourteen (14) or so avigation easements to be purchased or condemned. Additionally, the LRAA has removed mature trees within the Seneca Vista Historic District since acquiring 51 easements in the early 1990s, and removed trees and demolished homes when it purchased several tracts in Seneca Vista at that time. No Section 106 consultation was conducted whatsoever for any of these federally funded actions. The cumulative effects of these removals, which are visually striking within and outside the district, have not been addressed in the proposed no adverse effects finding.

(3) **McCoy Manor** - The CRE addresses this district in Section 3.6 (pp. 80-86), beginning with the following summary:

"Property Type: Post-War Suburb
Period of Significance: 1949-1957
Architecture: Mid-Twentieth Century Single and Multi-Family Residences (Examples of Ranch, Minimal Traditional, Cape Cod, and Colonial Revival)
General Integrity: High
NRHP Status: Eligible (Criteria A and C)
Safety Program Effect: No Adverse Effect"

Objections to the failure to recognize that the landscape contributes to the historic setting of McCoy Manor have been thoroughly documented in the administrative record previously, including comments submitted to your agency in July 2015 by PFTT and Dr. Ames' report.

The CRE claims that there will be no adverse effects to McCoy Manor Historic District because no avigation easements will be acquired and no trees will be removed. However, there will be adverse effects to the larger garden suburb setting of which this development is a component, as well as adverse visual effects from the loss of mature tree canopy in the individual neighborhood historic districts adjacent to McCoy Manor.

(4) **Seneca Manor Neighborhood (within the unevaluated City of Seneca Gardens, historically Seneca Gardens neighborhood)** - The CRE addresses this district in Section 3.7 (pp. 87-93), beginning with the following summary:

"Property Type: Post-War Suburb
Period of Significance: 1937-1958
Architecture: Mid-Twentieth Century (Largely Colonial Revival, with historic infill with Ranch and Split Level)
General Integrity: High
NRHP Status: Eligible (Criteria A and C)
Safety Program Effect: No Adverse Effect"

Objections to the failure to recognize that the landscape contributes to the historic setting of Seneca Manor, which should be evaluated within the City of Seneca Gardens, have been thoroughly documented in the administrative record previously, including comments submitted to your agency in July 2015 by PFTT, Angela Burton, Michael Hayman, Phyllis Hawkins, and Chris McCoy, as well as Dr. Ames' report referenced above.

At present, the CRE claims that one (1) tree, at 2625 Valletta, will be removed (depicted at the bottom of p. 3 of this submittal). An avigation easement is also proposed for acquisition by purchase or condemnation, and has not been addressed at all in the no adverse effect finding. Additionally, the LRAA may have removed mature trees within the Seneca Manor Historic District since at least the early 1990s and no Section 106 consultation was conducted whatsoever. The cumulative effects of any such removals have not been addressed in the proposed no adverse effect finding.

(5) **Kingsley** - The CRE addresses this district in Section 3.8 (pp. 94-104), beginning with the following summary:

"Property Type: Early Automobile Suburb
Period of Significance: 1926-1964
Architecture: Early to Mid-Twentieth Century (Cape Cod, Craftsman, Tudor Revival, Colonial Revival, Dutch Colonial Revival; limited Ranch)
General Integrity: High
NRHP Status: Eligible (Criteria A, B, and C)
Safety Program Effect: No Adverse Effect"

The draft CRE concluded that the landscape of Kingsley contributed to and was part of the historic district. The final CRE appears less clear in this regard and, to the extent, the text has been modified to remove or minimize the landscape elements, PFTT hereby objects.

The CRE claims that there will be no adverse effects to the Kingsley Historic District because no avigation easements will be acquired and no trees will be removed. However, there will be adverse effects to the larger garden suburb setting of which this development is a component—the earliest one—as well as adverse visual effects from the loss of mature tree canopy in Seneca Vista Historic District and Seneca Park, both adjacent to Kingsley.

(6) **Seneca Village Neighborhood** - The CRE addresses this district in Section 3.9 (pp. 105-111), beginning with the following summary:

"Property Type: Post-War Suburb
Period of Significance: 1947-1954
Architecture: Minimal Traditional
General Integrity: High
NRHP Status: Eligible (Criteria A and C)
Safety Program Effect: No Adverse Effect"

Objections to the failure to recognize that the landscape contributes to the historic setting of Seneca Village have been thoroughly documented in the administrative record previously, including comments submitted to your agency by PFTT and Dr. Ames.

At present, the CRE identifies twenty-nine (29) trees targeted for removal. This is a relatively small neighborhood and the visual impacts of trees already removed is striking, including the completely bare land now owned by the LRAA along Taylorsville Road, which is almost all of the frontage of the historic district. Twenty-three (23) avigation easements are also proposed for acquisition by purchase or condemnation, and have not been addressed at all in the no adverse effects finding. Additionally, LRAA has demolished homes after land acquisition and then removed mature trees within Seneca Village Historic District since at least the early 1990s, with no Section 106 consultation whatsoever. LRAA removed mature trees on its property and homes where it has avigation easements as recently as the first quarter of 2016 during the pending consultation. LRAA has not disclosed or released the number and types of trees affected, although

PFTT has sought this information in an Open Records Act request. The cumulative effects of these removals have not been addressed in the proposed no adverse effects finding.

(7) **Seneca Village No. 2 Neighborhood** - The CRE addresses this district in Section 3.10 (pp. 112-123), beginning with the following summary:

"Property Type: Post-War Suburb
Period of Significance: 1951-1960
Architecture: Pre-Fabricated Housing; Multi-family Housing
General Integrity: Moderate
NRHP Status: Eligible (Criteria A and C)
Safety Program Effect: No Adverse Effect"

Objections to the failure to recognize that the landscape contributes to the historic setting of Seneca Village No. 2 have been thoroughly documented in the administrative record previously, including comments submitted to your agency by PFTT and Dr. Ames.

At present, the CRE identifies nine (9) trees targeted for removal, including the tree depicted at the top of p. 3 of this submittal. This is a relatively small neighborhood. The visual impacts of these removed trees will be striking within the confined boundaries of the original development, and also because Seneca Village No. 2 and Seneca Village essentially appear as one "neighborhood" between Taylorsville Rd. and the Watterson (I-264). Nine (9) avigation easements are also proposed for acquisition by purchase or condemnation, and have not been addressed at all in the no adverse effects finding.

Documentation Relied Upon in this Disagreement Submittal

PFTT's formal disagreements are based upon the following documentation relating to your agency's proposed no adverse effect finding:

- May 24, 2016 email from Phillip Braden to consulting parties providing three attachments described as "FAA's Section 106 Determination of Effect Cover letter to Kentucky Heritage Council (KY SHPO), Section 106 determination, and associated documentation (APE exhibit). The final CRE and supplement will be forwarded to you in a separate email from Hanson . . ."
- May 25, 2016 email (8:53 a.m.) from Shawn Gibbs, Hanson, to consulting parties providing a file-sharing link to access "the final CRE and supplement."
- May 25, 2016 email (10:19 a.m.) from Shawn Gibbs, Hanson, to consulting parties providing a "new link to access the CRE and [s]upplement."

If your agency is also relying upon any other documentation, required by 36 CFR § 800.11 "to enable any reviewing parties to understand its basis" in support of the FAA's proposed no adverse effect findings, please let us know immediately. We find it necessary to seek this clarification since your letter of May 24, 2016 to the SHPO states that all of the consulting parties "will soon be receiving a hard copy of documents related to the proposed project," which did not occur.

In closing, it is unfortunate that the FAA has not consulted within either the spirit or requirements of Section 106. We believe a meaningful consultation, as we encouraged beginning in January 2012, would have resulted in early, consensus-based agreements on the scope of eligibility determinations and resolution of adverse effects that would have facilitated the implementation of the Bowman Field Safety Program. We remain willing to dialogue with your agency, as the federal funding and approval agency, to resolve our differences.

We anticipate that the FAA will now proceed with the notices and processes required by the Advisory Council's regulations regarding written objections of consulting parties to the no adverse effect proposed findings, and we will evaluate our options regarding the contested eligibility determinations.

Sincerely,

Leslie E. Barras

Leslie E. Barras
221 N. Clifton Avenue #19
Louisville, KY 40206
lebarras@gmail.com

c:
Craig Potts, State Historic Preservation Officer and Executive Director, Kentucky Heritage Council
Jennifer Ryall, Environmental Review Coordinator, Kentucky Heritage Council
Aaron Braswell, Environmental Specialist, FAA ADO Memphis

Zinniel 1

Braswell, Aaron (FAA)

From:	Zinniel, Mimi M <Mimi.Zinniel@olmstedparks.org>
Sent:	Thursday, June 23, 2016 9:37 AM
To:	Braden, Phillip (FAA)
Cc:	craig.potts@ky.gov; Braswell, Aaron (FAA)
Subject:	Bowman Field Section 106 comments

Dear Mr. Braden:

As Consulting Party in the Section 106 Consultation process, I have the following comments to make regarding the Historic Architectural Survey for the Bowman Field Airport Area Safety Program.

I concur that safety is of great concern, and I agree that the removal of the necessary obstructions to safe approaches and departures from Bowman Field is paramount.

However, I have concerns about several items, which I believe can be easily addressed:

1. I object to the FAA's determination that there will be no Adverse Effects on Seneca Park. It is known that removal of trees adversely affects air temperature, air quality, water quality and many socio-economic factors. Moreover, the loss of trees is an adverse effect to the landscape setting of Seneca Park. I stated this in earlier comments during the Section 106 process.
2. I disagree with the FAA's determination that the Areas of Potential Effect do not include the entirety of Seneca Park. Seneca Park as a whole is impacted when any element of it is impacted. Just as a playground or ball field or water fountain in Seneca Park is not an entity unto itself, separate from the Park, neither is the Golf Course. Please adjust the Areas of Potential Impact to include Seneca Park as a whole.
3. I disagree with and object to the FAA's determinations of ineligibility for Seneca Park based on its landscape. Seneca Park as a whole is eligible for listing in the National Register of Historic Places based on its landscape elements. This includes the Golf Course, an element of the original Olmsted design.
4. I assert that the Historic Architectural Survey commissioned by the LRAA via its hired consultant Hanson Professional Services, and produced by Brockington and Associates, is inadequate, and request it not be allowed to stand as written. Brockington lists only one Seneca Park-related document in the Reference Listing: *Program for the 25th Amateur Public Links Championship of the United States Golf Association.* A review of the original Olmsted design for the Park, and subsequent recent landscape work in the Park planned and executed by Olmsted design experts, would have revealed much more historic context based on landscape elements. Brockington either disregarded or did not consult the in-depth and informative volumes of information easily accessible in Louisville Metro Parks and Recreation Department's files; the Filson Historic Society's files; the Olmsted National Historic Site in Brookline MA; and the Library of Congress in Washington DC. All these sources were and are available for research.

In summary:

- I request that the FAA revise its determination to acknowledge that the removal of trees will have adverse effects on Seneca Park.

- I request that Seneca Park be considered as a whole within the context of a broad look at its history and historical landscape.

- I request that Seneca Park be recognized as eligible for Historic Registry based on, among other things, its landscape.

- I request that the Brockington document not be accepted until it is revised to more accurately reflect the historic nature of the subject properties.

Finally, while I acknowledge that the removal of certain magnificent, century old canopy trees cannot in this case be avoided, I sincerely hope agreement can be reached on generous mitigation to offset, at least in small part, the negative economic, environmental and emotional impacts of the loss of these important public and private assets.

Mimi Zinniel
Section 106 Consulting Party
President/CEO Olmsted Parks Conservancy

Burton 1

Braswell, Aaron (FAA)

From:	angela burton <angelakburton@hotmail.com>
Sent:	Thursday, June 23, 2016 11:13 AM
To:	Braden, Phillip (FAA)
Cc:	Braswell, Aaron (FAA); craig.potts@ky.gov
Subject:	Bowman Field Airport Area Safety Program Section 106 Consulting Party Comments

Dear Mr. Braden,

As a Consulting Party in the Section 106 Consultation process, I submit to you the following comments regarding the Historic Architectural Survey for the Bowman Field Airport Area Safety Program.

Safety is undoubtedly a top priority for everyone impacted by this program, and I understand that the removal of certain obstructions to safe approaches and departures from Bowman Field is necessary.

It cannot go without saying, however, that I have reservations about the following points, which I hope will be taken into wholehearted consideration:

I object to the FAA's determination that there will be no Adverse Effects on the surrounding neighborhoods or Seneca Park. The removal of trees, specifically large canopy trees, causes an unnecessary and adverse effect on existing wildlife, air temperature, air quality, water quality (drainage issues) and various socio-economic factors. Further, the loss of trees is an adverse effect to the landscape setting of our neighborhoods, namely Seneca Gardens, Seneca Vista and Kingsley to mention a few. Seneca Park itself is greatly impacted too for the same reasons.

I disagree with the FAA's determination that the Areas of Potential Effect do not include the entirety of surrounding neighbors and Seneca Park. When one area is affected, it is impossible that adjacent areas are not impacted as well. The neighborhoods are not boxed, as if in cubicles. Any act that directly affects certain homes and portions of neighborhoods, as well as Seneca Park will undoubtedly impact, even indirectly, the totality of its surroundings. Please include the Areas of Potential Impact to encompass Seneca Park as a whole and the surrounding neighborhood areas.

I disagree with and object to the FAA's determinations of ineligibility for Seneca Park and the Seneca Gardens, Seneca Vista and Kingsley based on its landscape. It is known that Seneca Park as a whole is eligible for listing in the National Register of Historic Places simply based on its landscape elements. This includes the Golf Course, an element of the original Olmsted design.

Further, I question whether the Historic Architectural Survey commissioned by the LRAA via its hired consultant Hanson Professional Services, and produced by Brockington and Associates, is adequate, and formally ask that it be revisited and rewritten thoroughly. It appears there are numerous elements that have been omitted wrongfully, some of which are details that should have been included and could have been cited via Louisville Metro Parks files, the Olmstead National Historic Site, the Filson Historic Society, etc. Many of these sources were and are available for research.

In summary:

I request that the FAA revise its determination to acknowledge that the removal of trees will have adverse effects on both the designated neighborhoods and Seneca Park.

I request that surrounding neighborhoods and Seneca Park be considered as a whole within the broad context regarding historical landscape.

I request that affected neighborhoods and Seneca Park be recognized as eligible for Historic Registry based certainly on landscape.

I request that the Brockington report not be accepted unless it is revised to be more inclusive of the historical facts of the properties being affected.

To conclude, though I am disheartened by the dramatic removal of particular impressive, old-growth canopy trees, I remain hopeful that all parties will reach a fair mitigation to balance the negative environmental, historical, economic and emotional impacts of the loss of this valued tree canopy.

Sincerely,
Angela Burton

Angela Burton
Founder/Chief Writing Motivator
Feet to the Fire Writers' Workshops
502.299.5861

http://www.feettothefirewriters.com/message
Facebook: https://www.facebook.com/pages/Feet-to-the-Fire-Writers-Workshops/1501453800112033?fref=nf&pnref=story
Twitter@onfirewriters

D Jones 1

Braswell, Aaron (FAA)

From:	Jones, Earl F (GE Appliances) <EARL.JONES@GE.COM>
Sent:	Friday, June 24, 2016 9:47 PM
To:	Braden, Phillip (FAA)
Cc:	craig.potts@ky.gov; Braswell, Aaron (FAA); Mimi.Zinniel@olmstedparks.org; Beth Peabody; Bill Juckett; Brett Jeffreys; Brian Cahoe; Caroline Seay Borgman; Charlie Marsh; Chris Reid; Chuck Schnatter; Craig, Sherri; David Brown; David Dunn; David Power; Drew Perkins; Geoff White; Ghose, Seve; Gwen Tilton; John Bajandas; John Hollenbach; John Thomas; Jonathan Henney; Keith Jones; Kennedy Simpson; LouAnn Atlas; Mark Preston; Mary Anne Thornton; Mike Mays; Morgan Ward; Nancy Bush; Nancy Woodcock; Rob Auerbach; Rob Townsend; Robert Conroy; Robert Fulk; Tony Deye; Mary Ellen Wiederwohl; DeHart, Liz J; Perkins, Amanda; Wilhelmus, Anne; Roth, Frances; Ward, Susan G.; Wolff, Sarah C; Waltman, Major
Subject:	Bowman Field 106 Comments

Dear Mr. Braden:

The Louisville Olmsted Parks Conservancy ("Conservancy") is a 501(c)(3) corporation that was founded in 1989 as a public private partnership with the City of Louisville. The conservancy's mission is to restore, enhance and forever protect the city's Frederick Law Olmsted-designed parks and parkways. Since 1989 the Conservancy has raised over $30 million to fund capital investments in our Olmsted-designed parks.

Olmsted, known as the father of American landscape architecture, had designed New York's Central Park, Boston's Emerald Necklace, the grounds of the U.S, Capitol and other historical landscapes before he was prevailed upon by Louisville's city fathers to come to their city to design the city's parks. He combined the best of what he had learned in his previous efforts to design Louisville's system of parks and parkways, which comprise his most complete park system. Seneca Park, which was dedicated in 1928, was the last of the parks designed by the Olmsted firm.

On behalf of the Conservancy and its board of directors, I am submitting the following comments regarding the Historic Architectural Survey for the Bowman Field Airport Area Safety Program.[1]

At the outset, the board wished to affirm its support for the continued operation of Bowman Field and the safety program's objective to improve operational safety of the airport. Safe operation of the airport is critical not only for the pilots and aviation users but also for neighbors and Seneca Park users. If improved safety requires removal of park trees that have intruded into flight paths, we do not object to their being lit, topped, or removed to ensure safe approaches and departures.

Having acknowledged that safety concerns require the removal of many native canopy trees, our responsibility as stewards of the park requires that we insist that adverse impacts to the park be recognized and minimized, that appropriate remediation be implemented and that the historical nature of the park be recognized and protected. Our more specific concerns are set forth below:

I. The Historic Architectural Survey produced by Brockington and Associates as it relates to Seneca Park is inadequate, is not informed by professional standards of historical preservation assessment and landscape design and must be revised.

Brockington lists only one Seneca Park-related document in the Reference Listing: *Program for the 25th Amateur Public Links Championship of the United States Golf Association*. More appropriate and relevant information regarding the park's historic landscape elements would have been provided by

the original Olmsted design for the Park and by recent landscape work done in the Park and planned by experts schooled in Olmsted's design.

If Brockington ignored this information, which is easily accessible in files in Louisville Metro Parks and Recreation Department; the Filson Historical Society; the Olmsted National Historic Site in Brookline MA; and the Library of Congress in Washington D.C., Brockington's professional dereliction is evident. If Brockington rejected the information, the basis for the rejection should have been discussed. Not having done so is additional evidence of failing to meet professional standards.

Seneca Park as a whole is eligible for listing in the National Register of Historic Places based on its landscape elements. This includes the Golf Course, an element of the original Olmsted design, and the original automobile concourse corridor, today Pee Wee Reese Road and park land on the west. The Brockington report's determination of ineligibility of the landscape and omission of the park as a whole are not supported by the evidence.

The Brockington report as it relates to Seneca Park does not meet required professional standards of historical preservation and historic landscape design assessment. For these reasons, it must be rejected.

II. The determination that there will be no Adverse Effects on Seneca Park as an entity defies common sense and is not supported by the weight of the evidence.

Removal of trees adversely affects air temperature, air quality, water quality and, as a result, park enjoyment and usability. Moreover, the loss of trees adversely affects the Seneca Park landscape. Seneca Park as a whole is impacted when any element of it is. As an example, any single feature of a park-- a playground or ball field or water fountain-- is not just a stand-alone entity or separate from the Park itself. And, neither is the Golf Course or original automotive corridor. All areas, facilities and elements of the park together comprise the park and the Area of Potential Effect to be assessed is Seneca Park as a whole.

The determination that the Areas of Potential Effect do not include the entirety of Seneca Park must be reversed. The Board formally objects to the No Adverse Effect finding.

III. Conclusion

The Conservancy demands that the FAA acknowledge that the removal of trees will have adverse effects on Seneca Park and revise the determination to so find. In revising the determination, the agency must assess Seneca Park as a single, whole entity with an historical landscape as justified by its design and history. And, for this reason, the FAA must eschew any effort to deprive Seneca Park of eligibility for the National Register of Historic Places based on, among other things, omission of its landscape.

The Brockington report should not be accepted until it is revised to more accurately reflect the historic nature of the park.

The Conservancy is committed to working with the Louisville Regional Airport Authority, Louisville Metro Parks & Recreation, Bowman Field neighbors and other stakeholders to reach agreement on appropriate mitigation to offset as much as possible the negative historic, economic and environmental impacts on the park.

Sincerely,

Earl F. Jones,
Board Chair

Louisville Olmsted Parks Conservancy

SHPO 1

TOURISM, ARTS AND HERITAGE CABINET
KENTUCKY HERITAGE COUNCIL

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THE STATE HISTORIC PRESERVATION OFFICE
300 WASHINGTON STREET
FRANKFORT, KENTUCKY 40601
PHONE (502) 564-7005
FAX (502) 564-5820
www.heritage.ky.gov

June 27, 2016

Phillip J. Braden
Manager
Memphis Airports District Office
Federal Aviation Administration
2862 Business Park Drive, Bldg G
Memphis, TN 38118-1555

RE: Determination of Effects; Bowman Field Airport Area Safety Program, Louisville KY

Dear Mr. Braden:

The Kentucky Heritage Council, State Historic Preservation Office has received for review and comment, the above referenced Determination of Effects evaluation for the Bowman Field Area Safety Program in Louisville, Kentucky. The purpose of this undertaking is to reduce tree heights so that nighttime instrument approach capabilities would be restored to the Bowman Field Airport. More than 100 mature trees in neighborhoods/areas adjacent to Bowman Field will be trimmed or removed entirely as part of this undertaking, in order to comply with safety requirements.

In accordance with 36 CFR §800, the FAA identified this project as an "undertaking" due to its potential to affect historic properties. Participants in the process were defined as the lead federal agency (FAA), the applicant (Louisville Regional Airport Authority (LRAA)), the Kentucky State Historic Preservation Officer (KYSHPO), Louisville Metro Government, and invited consulting parties (§800.3). A listing of those consulting parties is attached with this letter.

Through consultation under 36 CFR §800.4, the undertaking's Area of Potential Effect (APE) was defined, refined, and concurred upon, and the applicants' consultants (Brockington Cultural Resources Consultants and Hansen Professional Services, Inc.) submitted a Historic Architectural Survey, a Cultural Resource Evaluation report (CRE), and a supplemental CRE report. Due to certain inadequacies contained within the various reports (such as boundary demarcations for eligible historic properties and districts), KYSHPO and the consulting parties did not concur with the final determination of eligibility. While general agreement on the nature and location of eligible and listed historic properties was reached, a finalized CRE document containing all historic properties, with defined boundaries located within (or partially within) the APE, has yet to be received.

In accordance with 36 CFR §800.5 (Assessment of adverse effects), The FAA provided a Determination of Effects letter that was received on May 27, 2016. In that letter, the FAA determined that the following sites are eligible for or listed on the National Register of Historic Places:

- Bowman Field Historic District;
- Seneca Park;
- Seneca Vista Historic District;
- Seneca Manor Historic District;
- McCoy Manor Historic District;
- Kingsley Historic District;
- Seneca Village Historic District; and
- Seneca Village No. 2 Historic District.

The FAA recommended that the removal of mature trees from within the undefined boundaries of certain historic districts mentioned above would have no adverse effect because, "…the vegetative plantings are not a contributing element to eligibility of any of the resources."

In the regulations found at 36CFR§800.5 (a)(1), it is stated that, "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, ***setting*** [emphasis added], materials, workmanship, feeling or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative." It is further stated in 36 CFR §800.5(a)(2)(iv) that, "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance" is an example of an adverse effect.

The removal or alteration of more than 100 mature trees within historic districts such as the Olmstead designed Seneca Park has a particularly clear impact on integrity of setting. That said, it seems clear that certain safety program enhancements already proposed by the applicant could significantly reduce the overall impact. After reviewing the consulting party comments that were received in reply to the FAA's "Determination of Effects" letter, it appears that incorporation of the following conditions into the project will streamline the process and resolve disagreement between parties included through 36 CFR §800.3. Those conditions are as follows:

1. The applicant (LRAA) will compel its cultural resource management consultants to complete the CRE document as requested by the KYSHPO and consulting parties by September 30, 2016. This includes compiling all of the various elements of historic property evaluation into one comprehensive document and providing defensible boundaries for all eligible historic districts and a full evaluation of the Olmstead designed Seneca Park;

2. Trees will be assessed by a professional arborist as to whether they can be trimmed or should be removed;

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3. All trees that are removed will be replaced with an appropriately diverse selection of low canopy trees at a ratio of two to one (2:1) within the above referenced historic districts. Homeowners may select less than two trees for each existing tree that is removed from their property, but the overall replanting ratio of two to one (2:1) will be maintained project-wide, regardless of homeowner preferences;

4. If a tree is removed in a landscaped area of the yard, the homeowner will be eligible for a re-landscaping allowance up to $2,500.00. The landscaping allowance will be over and above the cost of replacement trees;

5. The LRAA will pay for all tree trimming and/or removal, stump removal and yard restoration directly related to this project;

6. All new landscape planting, including shrubs, perennials, ornamental grasses, and ground covers, will carry a one (1) year warranty; replacement trees will carry a two (2) year warranty by the LRAA; and

7. The aforementioned conditions, provisions numbered one (1) through six (6) above, will be added to the project's Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) as planned components of the project/undertaking.

So long as the referenced measures, provisions one (1) through seven (7) above, are adopted, implemented, and carried out, it is the determination of this office that the undertaking would avoid adverse effects. This undertaking is therefore provided a ***conditional*** **No Adverse Effect finding**. Please respond with your decision regarding the adoption of provisions one (1) through seven (7) above into the project design.

Should you have any questions, please contact me at 502-564-7005 x 111.

Sincerely,

Craig A. Potts
Executive Director
Kentucky Heritage Council and
State Historic Preservation Officer

Attachments: Invited consulting parties list, pursuant to 36 CFR §800.3

CC: Don Parkinson, Secretary, Tourism, Arts, and Heritage Cabinet
Leigh Powers, General Counsel, Tourism, Arts, and Heritage Cabinet
Skip Miller, Executive Director, Louisville Regional Airport Authority
Invited consulting parties

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Invitation List – Bowman Field Safety Program

1. Skip Miller, Executive Director, LRAA
2. Craig Potts, Executive Director, Kentucky SHPO

Government representatives:

3. Mayor Greg Fischer
   Louisville/Jefferson County Metro Government
   Metro Hall / 4th Floor
   527 W. Jefferson St.
   Louisville, KY 40202

4. Louisville/Jefferson County Metro Government
   Historic Preservation Officer
   Planning & Design Services
   444 S. 5th St.
   Louisville, KY 40202
   (502) 574-5210

5. Louisville/Jefferson County Metro Government
   Michael J. Heitz, AIA, Director of Parks
   Administration Building
   1297 Trevilian Way
   Louisville, KY 40213
   (502) 456-8100
   michael.heitz@louisvilleky.gov

6. City of Seneca Gardens
   David Brown, Mayor
   2547 Dell Road
   Louisville, KY 40205-2309
   david.brown@bbandt.com

7. City of Kingsley
   Rebecca Beld, Mayor
   P.O. Box 5515
   Louisville, KY 40255-0515
   Mayor: (502) 452-6478
   City Clerk: Marilyn Whistler, info@cityof kingsley.org; (502) 458-7398

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Affected Metro Louisville Council Members:

Mailing address: City Hall, 3rd floor, 601 W. Jefferson St., Louisville, KY 40202-2741

8. Tom Owen, 8th District
   (502) 574-3455
   Tom.owen@louisvilleky.gov
   Legislative aide: Terra Long, terra.long@louisvilleky.gov

9. Bill Hollander, 9th District
   (502) 574-1109
   Bill.hollander@louisvilleky.gov
   Legislative aide: Ms. Kyle Ethridge, kyle.ethridge@louisvilleky.gov

10. Brent Ackerson, 26th District
    (502) 574-1126
    Brent.ackerson@louisvilleky.gov
    Legislative aide: Jeff Noble, jeff.noble@louisvilleky.gov

Organizations:

11. Big Spring Country Club
    Mr. Kelly Maxwell, General Manager
    5901 Dutchmans Lane
    Louisville, Kentucky 40205-3275
    (502) 459-2622 Work
    (502) 693-3837 Cell
    (502) 451-2988 Fax
    kmaxwell@bigspringcc.com
    www.bigspringcc.com

12. Olmsted Conservancy
    Mimi Zinniel, Executive Director
    1299 Trevilian Way
    Louisville, KY 40213
    (502) 456-8125 Work
    Mimi.Zinniel@olmstedparks.org

13. Plea for The Trees
    c/o Leslie Barras
    2337 Frankfort Avenue, #350
    Louisville, KY 40206
    (502) 298-1505
    lebarras@gmail.com

14. Kentucky Resources Council
    Tom Fitzgerald, Director
    PO Box 1070
    Frankfort, KY 40602
    fitzkrc@aol.com

SHPO 6.

Individuals (Submitted written requests)

15. Phyllis Hawkins (Close Proximity to APE)
    2611 Kings Hwy.
    Louisville, KY 40205

16. J. Chris McCoy (In APE)
    2540 Kings Hwy.
    Louisville, KY 40205

17. Angela Burton (In APE)
    2629 Drayton Dr.
    Louisville, KY 40205

Ghose 1

Braswell, Aaron (FAA)

From: Ghose, Seve <Seve.Ghose@louisvilleky.gov>
Sent: Friday, June 24, 2016 3:22 PM
To: Braden, Phillip (FAA)
Cc: Braswell, Aaron (FAA)
Subject: Seneca Park, Louisville, KY
Attachments: Louisville Metro Parks and Recreation Letter(s).pdf

Hello Mr. Braden,

Attached are two items related to the continuing work at Seneca Park and Bowman Field in Louisville.

In conversation with Mr. Braswell today, we agreed that Metro Parks and Recreation as the property owner of Seneca Park looks forward to working closely with you and other partners in moving the project forward. We also understand that the current NEPA findings do not preclude Seneca Park from ever being dropped from the process for historic designation.

If there are direct questions of me please contact me at the address below. Have a great weekend!

Regards,
Seve

Seve Ghose, CPRE/MOL
Director,
Louisville Metro Parks and Recreation
1297 Trevilian Way
Louisville, KY 40213.
502-574-PARK (7275)
Seve.Ghose@louisvilleky.gov

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AND RECREATION

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Ghose 2

DEPARTMENT OF METRO PARKS
LOUISVILLE, KENTUCKY

GREG FISCHER
MAYOR

SEVE GHOSE, CPRE
DIRECTOR

June 24, 2016

Sent via U.S. Mail and to Phillip.Braden@faa.gov

Mr. Phillip Braden
Manager, Memphis Airports District Office
Federal Aviation Administration
2600 Thousand Oaks Blvd., Suite 2250
Memphis, TN 38118 2482

Re: Bowman Field Safety Program; Louisville, KY

Dear Mr. Braden:

Metro Parks received your email communication of May 24, 2016 regarding the FAA's Section 106 Determination of Effect cover letter and Section 106 determination document for the above-referenced project.

Metro Parks appreciates that the Bowman Field Safety Program is needed to ensure the functionality of the airport and meet FAA standards. We continue in our willingness to work with the FAA and LRAA in a constructive manner to accomplish these objectives.

Our views on the eligibility of Seneca Park in its entirety, and the impact of the Program on the park was stated in the enclosed letter of July 9, 2015 to your office, and remain the views of the department.

If you have any questions, please do not hesitate to contact me at Seve.Ghose@louisvilleky.gov or 502-574-6186.

Sincerely,

Seve Ghose, CPRE/MOL
Director, Louisville Metro Parks and Recreation

Enclosure

Chase 3

METRO Parks

Michael J. Heitz, AIA
Director

Post Office Box 37280
Louisville, Kentucky
40233-7280

tel 502/456-8100
fax 502/456-3269
tdd 502/456-8183

web www.metro-parks.org
email parks@louisvilleky.gov

Date: July 9, 2015

To: Mr. Stephen Wilson (stephen.wilson@faa.gov)

From: John A. Swintosky, Louisville Metro Parks Landscape Architect
on behalf of Lisa Hite, Louisville Metro Parks Senior Planner

RE: Bowman Field Safety Program; Louisville, KY
Section 106 of the National Historic Preservation Act

Dear Mr. Wilson:

On June 24, 2015 I participated in the Section 106 Consultation Meeting related to the Bowman Field Program. At that meeting, comments were made regarding Seneca Park. Here are Louisville Metro Parks' positions regarding the Bowman Field Safety Program and the current draft of the Cultural Resource Evaluation report.

While Seneca Park has not been evaluated for eligibility or listing in the National Register of Historic Places, it is considered eligible by age (designed in 1928) and by association with the Olmsted design firm, which also designed the National Registered listed parks and parkways in Louisville. It is important that that Cultural Resource Evaluation for the Bowman Field Safety Program evaluate the Seneca Park resource as a whole – not just a portion of one designed element within the park. When this broader view is taken and national guidelines are followed, Metro Parks believes that Seneca Park will be determined to be eligible - including its landscape elements.

The golf course in Seneca Park is just one component of this historic park. It is not appropriate to isolate one designed element to determine value or integrity of an historic site. The golf course has retained its integrity as a designed landscape within the overall Seneca Park site. Any changes to the golf course – such as a significant number of tree removals and permanent alteration of the designed living landscape – will impact all park users and usage, and thus will be an adverse effect to the park as a whole.

The park property along Pee Wee Reese Road (that includes the American Cancer Society Living Grove of Memorial Trees) is an integral part of the park entry experience in the original 1928 Olmsted firm general plan for Seneca Park. This area of potential impact needs to be included in the identification and evaluation in the Cultural Resource Evaluation report. Removal of mature trees along the "automobile course" corridor will be a permanent change to the designed living landscape and an adverse effect to the park as a whole.

Thank you for your attention.

Sincerely,

John A. Swintosky

John A. Swintosky, RLA
Louisville Metro Parks Landscape Architect