The Advisory Group meeting to review the proposed land management plan amendment for the Horn Springs Addition to Natural Bridge Battlefield Historic State Park was held at the Rakestraw House, Natural Bridge Battlefield Historic State Park on Wednesday, August 8, 2018, from 9:00 a.m. to 12:00 p.m.

Brian Lee, Peter Gerrell, Jason O'Donoughue, Kerri Post and Jamie Van Pelt were not in attendance. Andy Johnson represented Chairman Nick Maddox, Loran Anderson represented Scott Davis, Gary Sisco represented Dawn Brown, Thomas Christopher represented Shawn Duggar, Morgan Wilbur represented Billy Sermons, John Crowe represented Tyler MacMillan, Gwen Beatty represented Liz Farmer. All other appointed Advisory Group members were present as well as George Warthen with FWC, Elwood McElhaney with the Florida Trail Association and Robert Trapp with the Natural Bridge Historical Society. Attending staff were Benjamin Faure, Randy Rabon, Mark Stevenson, Arthur Stiles, Joel Albritton and Sine Murray.

Ms. Murray began the meeting by explaining the purpose of the Advisory Group and reviewing the meeting agenda. She provided a brief overview of the Division's planning process and summarized public comments received during the previous evening's public workshop. She then asked each member of the advisory group to express his or her comments on the plans.

During the two-week public comment period following the advisory group meeting, the DRP received no additional comments from members of the public about the proposed land management plan amendment for the Horn Springs Addition to Natural Bridge Battlefield Historic State Park.

#### **Summary of Advisory Group Comments**

## Peter Kleinhenz (Audubon Florida, Apalachee Chapter)

Mr. Kleinhenz stated that the management of this acquisition provides an opportunity to highlight the connectivity between the City of Tallahassee and the use and management of its water to nearby springs through natural resource interpretative signage and programming. He expressed that extreme care should be taken to protect the river shoreline and spring run from degradation by erosion. He commented that law enforcement should be used to protect habitat and the resources of the site and that Florida State Parks have a good track record on protecting park resources. He expressed concerned that the recommended optimum fire return interval identified in the plan is too low. He recognized the challenges to implementing a new prescribed fire program, but encouraged the FPS to quickly implement prescribed fire management due to the benefits to wildlife. He requested that the species list be updated and expanded before publication of the final plan as there are species present on site that are not reflected in the current draft. Mr. Kleinhenz specifically referenced the importance of listing any cave adapted species, present within the park. He stated that Apalachee Audubon will help to raise awareness about the unique resources of the area.

## Loran Anderson (Florida Native Plant Society)

Mr. Anderson also commented that current species list did not appear to be comprehensive. He stated that he has extensive experience in plant identification and offered to help improve the species list. Dr. Anderson also recommended that botanical surveys be conducted along proposed trail routes and prior to trail installation to ensure the identification and protection of any rare plant species or rare plant populations.

# Morgan Wilbur (Florida Freshwater Fish and Conservation Commission)

Mr. Wilbur also expressed some concern with how the proposed fire return interval was presented in the plan. He stated he could eventually determine the fire management recommendations and generally concurred with what was presented in the plan. He recommended a targeted two-year fire return interval for wildlife management. He commented that the required timber assessment was not included and that it would be helpful to review the timber management plan to ensure robust objectives for wildlife management. He recommended that wildlife management prioritize habitat management for gopher tortoise as the plan identifies nearly 200 acres of sandhill as potential gopher tortoise habitat. However, he mentioned that this area would likely be considered a low priority for gopher tortoise reintroduction. Mr. Wilbur also recommended monitoring for additional imperiled species including the Red cockaded woodpecker and the Bachman's sparrow.

# Gary Sisco (Florida Trail Association, Apalachee Chapter)

Mr. Sisco stated that the Florida Trail Association is excited about this new addition to the park and that they are willing to assist with constructing new trails. He proposed a loop trail to Horn Springs and back and that they could plan the trail to be sensitive to the ecological and cultural treasures of the site.

## Gwen Beatty (Apalachee Canoe and Kayak Club)

Ms. Beatty stated that the club was very pleased that Horn Spring would once again be accessible for paddling. She indicated that club members had paddled this area before the access roads were closed. She encouraged the use of simple paddling launch such as a patch of sand or other natural surface area and to design the launch to minimize erosion. Ms. Beatty offered the assistance of the club to maintain the paddling trail along the river once it is established. She also encouraged greater interpretation of the cultural resources at the site.

# Major Donald Duval (Florida Freshwater Fish and Conservation Commission Law Enforcement)

Major Duval stated that the critical need for FWC Law Enforcement is to ensure access. Management for the Horn Springs Addition should maintain the perimeter road along the eastern property boundary to facilitate access to Plank Road State Forest and Wildlife Management Area. He recommended that the state park use signage or other means to notify the public that they are entering a state park boundary. He reiterated the need to maintain the public access along the perimeter. and not close the perimeter access with gates. When asked about the potential for unauthorized motorized access to Horn Springs, Major Duval indicated that they take the responsibility to protect resources very seriously and will work proactively with agency partners to address potential violations. He indicated that this included protection of the area's cultural resources and that in the last five years protection of the cultural resources has been a priority for FWC LE. He expressed that with a new acquisition it will be important to set the tone early to establish the expectations of the public and to work with agency partners to solve issues as they develop.

# Jim Stevenson (Local Property Owner)

Mr. Stevenson though the draft plans looked pretty good and that he was pleased to see that recreational access would be limited. He stated that in the past the Florida Park Service has had a difficult time changing recreational use patterns if they were established prior to state ownership or if proposed recreational uses were not carefully considered. He commented on the need for extra evaluation and analysis of the potential impacts of recreational cave diving should it ever be considered for the park. Due to the presence of sensitive resources like Horn Spring, he expressed the importance of providing sanitary facilities before recreational access is permitted. He indicated that any sanitary facilities should not utilize drain fields due to the potential impact to water quality. Concerning facilities, Mr. Stevenson stressed the importance of facility maintenance and that there is nothing worse than a nice facility that is poorly maintained. Mr. Stevenson stated that regular facility maintenance requires professional staff in addition to volunteers.

## Jason Love (Florida Forest Service)

Mr. Love presented comments for all advisory group members from the Florida Forest Service. Mr. Love made several editorial comments and suggestions. He also suggested that the acreage figure and fire return interval be added to each natural community description. He was concerned about the mapping of the river corridor as Floodplain Forest or Alluvial Forest based on worked conducted by the Florida Natural Areas Inventory. He recommended that best management practices for sinkholes be followed where sinkholes are present in the uplands. He also expressed concern that our target acreage for prescribed fire management was too

low. He would like to review the draft timber assessment and its recommendations for Mesic Flatwoods. He pointed out a potential error in the ownership description of surrounding properties. He stated that he served on several advisory groups for adjacent managed areas and that the public is very interested in connected recreational trails along this corridor. He stated that the Forest Service is seeking funding to rebuild at least one of the existing bridges that cross the river.

# Buzz Gifford (Natural Bridge Historical Society, Inc.)

Mr. Gifford stated that the Natural Bridge Historical Society (the park's Citizen Support Organization [CSO]) contributes lots of volunteer time and helps with many projects at the park. Mr. Gifford supports this acquisition and emphasized the importance of further archaeological studies and continued cultural resource management at the park. Mr. Gifford thought that the plan did not provide enough discussion on the importance of the areas south of Natural Bridge Rd. and that this is the area of greatest interest to the park's CSO. The CSO supports the picnic facilities and other items mentioned in the plan that are located along Natural Bridge Rd. Mr. Gifford inquired about the old ranger residence located along the river, just north of the monument and if it had been removed. Park staff indicated that it had been removed. Mr. Gifford stated that the CSO would certainly help as needed but their primary focus is the protection of the historic battlefield and maintenance of the original park.

## Grant Gelhardt (Sierra Club of the Big Bend)

Mr. Gelhardt suggested that greater discussion of private road easements, outparcels and related issues be included in the plan. He requested that discussion of the proposed paddling trail be modified so that the need to clear out the trail and eliminate portages is clear to the reader. He also expressed the need for appropriate sanitary facilities at Horn Spring and the importance of including seating. He recommended appropriate signage at the proposed boat ramp to director visitors to the parking. He thought that plan should include a commitment to the removal of Hydrilla in the spring run streams present on the property. He suggested that current discussions with partner agencies on hydrilla removal be added to the plan. He also suggested that information concerning recent dye trace studies should be included to demonstrate the interconnection of karst systems in this area. He encouraged further cave exploration by scientific researchers. He suggested that the plan include an objective related to water quality monitoring so that water quality changes could be monitored over time. Mr. Gelhardt thought the current level of recreational amenities should be expanded to include a short nature trail south of Natural Bridge Rd. near Rhodes Springs. Mr. Gelhardt believes that there is strong potential for development of a connected trail system and that discussion of the importance of this property to trail connectivity be expanded.

## Andy Johnson (Leon County Board of County Commissioners)

Mr. Johnson also wanted to emphasize the opportunity for future trail connectivity and coordination with the Leon County Greenways Master Plan. Mr. Johnson suggested that the plan should add the newly opened St. Marks Headwaters Greenway in the discussion about nearby conservation lands. He also requested that the park coordinate with Leon County EMS and the Leon County Sheriff's Office on matters concerning public safety and law enforcement.

# John Crowe (Northwest Florida Water Management District)

Mr. Crowe expressed that he had no specific comments. He stated that the water management district supports the plan and that they had supported the original acquisition with the preliminary site analysis using LIDAR. He mentioned that the they support hydrological restoration projects, as well as flood mapping, and septic to sewer conversions.

## Summary of Public Comments

# Elwood McElhaney (Florida Trail Association, Apalachee Chapter)

Mr. McElhaney stated that he was the unofficial lead for assisting with trail development at the park and that they were eager to get started. He volunteered his services to assist with trail development as soon as the park is ready.

## Robert Trapp (Natural Bridge Historical Society, Inc.)

Mr. Trapp expressed his support for the acquisition and that the CSO is willing to help but reiterated that the primary focus of the CSO was to support the protection and interpretation of the historic battle.

# Summary of Written Comments from Advisory Group Members

## Jason O'Donoughue (Division of Historical Resources)

Mr. O'Donoughue was not able to attend the advisory group meeting but did submit written comments (see attached).

## Jim Stevenson (Local Property Owner)

Mr. Stevenson provided written comments that reflected those he provided at the meeting (see attached).

# Buzz Gifford (Natural Bridge Historical Society, Inc.)

The Natural Bridge Historical Society provided written comments that requested emphasis on the protection of cultural resources as proposed recreation activities

are developed, called for an additional archeological research at the park, and an stated objection to the possible relocation of the Rakestraw House in addition to his comments provided at the meeting (see attached).

# Staff Recommendations

The staff recommends approval of the proposed management plan for the Horn Springs Addition to Natural Bridge Battlefield Historic State Park as presented, with the following modifications:

- Additional language will be added to improve the discussion concerning regional trail and greenway planning efforts and the importance of the park to regional trail connectivity. Inclusion of an additional short nature trail near Rhodes Spring will be considered. The discussion on future recreational uses will be reviewed and updated based on advisory group comments.
- The resource management component will be reviewed and updated based on advisory group comments including updates to fire management objectives and expansion of the discussion on water quality, aquatic vegetation removal, and connectivity to the underlying karst system. Updates will also be made to the list of plant and animal species as appropriate.
- Additional discussion will be included regarding the presence of private easements and outparcels within the park boundary and how they may affect park management and operations.

## Notes on Composition of the Advisory Group

Florida Statutes Chapter 259.032 Paragraph 10(b) establishes a requirement that all state land management plans for properties greater than 160 acres will be reviewed by an advisory group:

"Individual management plans required by s. 253.034(5), for parcels over 160 acres, shall be developed with input from an advisory group. Members of this advisory group shall include, at a minimum, representatives of the lead land managing agency, co-managing entities, local private property owners, the appropriate soil and water conservation district, a local conservation organization, and a local elected official."

Advisory groups that are composed in compliance with these requirements complete the review of State park management plans. Additional members may be appointed to the groups, such as a representative of the park's Citizen Support Organization (if one exists), representatives of the recreational activities that exist in or are planned for the park, or representatives of any agency with an ownership interest in the property. Special issues or conditions that require a broader representation for adequate review of the management plan may require the

appointment of additional members. The Division's intent in making these appointments is to create a group that represents a balanced cross-section of the park's stakeholders. Decisions on appointments are made on a case-by-case basis by Division of Recreation and Parks staff.



# FLORIDA DEPARTMENT Of STATE

RICK SCOTT Governor **KEN DETZNER** Secretary of State

August 13, 2018

Sine Murray Office of Park Planning Division of Recreation and Parks Florida Department of Environmental Protection 3900 Commonwealth Boulevard, MS 525 Tallahassee, FL 32399

Dear Ms. Murray,

Thank you for inviting the Division of Historical Resources (DHR) to participate in the advisory group review of the draft management plan for the Horn Springs Addition to Natural Bridge Battlefield Historic State Park. We have completed our review and have the following comments and recommendations:

- 1. We note several discrepancies between your records and those of the Florida Master Site File (FMSF):
  - a. Table 5 of the management plan (pg. 49) lists nine archaeological sites and two historic structures. However, several resources recorded in the FMSF database are not recorded in the table. These include the Historic Structure 8LE05730;
    Archaeological Sites 8LE00524 and 8WA00091; and Resource Group 8LE05732.
  - b. Archaeological Site 8LE00009 Natural Bridge 1 is incorrectly recorded in Table 5 as 8LE0008.
  - c. 8LE05731 Natural Bridge Road is reported in Table 5 as a Historic Structure, but is recorded in the FMSF as a Resource Group.
  - d. 8LE05792 Natural Bridge Road bridge is reported in Table 5 as a Historic Structure, but is recorded in the FMSF as a Historical Bridge.
  - e. The "Significance" reported for many of the resources does not accurately reflect the assessments of the State Historic Preservation Officer (SHPO). 8LE00188 should be listed as NRL; 8LE05731 as II; 8LE05792 as NS; and the remainder as NE as they have not been evaluated by the SHPO. These discrepancies may have arisen in cases where an assessment was made by the individual that documented the resource (referred to as the "surveyor" in FMSF records), but this does not

constitute an evaluation by the SHPO. Both the surveyor's opinion and the SHPO evaluation are recorded in the FMSF.

- 2. An accurate cultural resources inventory is critically important for effective management. The full listing of cultural resources in the FMSF is enclosed. The total inventory includes 11 archaeological sites, 1 historic structure, 2 resource groups, and 1 historical bridge. Please adjust the management plan to accurately reflect the FMSF inventory.
- 3. With regard to the goal "Protect, preserve and maintain the cultural resources of the park" (pg. 51–52 and Table 8, Goal VI):
  - a. We recommend that you include annual monitoring of all archaeological and historical resources as an action under Objective A.
  - b. We agree that additional survey for cultural resources will likely be necessary on the Horn Springs Addition. Staff from DHR's Public Lands Archaeology program (PLA) are available to conduct a cultural resources reconnaissance survey, assess known sites, and provide management recommendations.

Please let us know if you have any questions or concerns regarding these comments. Thank you again for inviting us to participate and for your diligence in preserving, promoting, and interpreting Florida's cultural heritage.

Sincerely,

Jon Van

Jason O'Donoughue Archaeologist III Public Lands Archaeology Bureau of Archaeological Research Division of Historical Resources Florida Department of State B. Calvin Jones Center for Archaeology 1001 DeSoto Park Drive Tallahassee, Florida 32301

Enclosures: Horn\_Springs\_FMSF\_Records.xlsx

# **Recommendations for Management and Use of Horn Spring**

The Florida Park Service has managed springs since 1949 when Manatee Spring State Park was established. Today, the park service manages over 50 springs in state parks throughout north and central Florida.

Public lands must be managed so as to protect them from abuse. In the absence of protection, they are vandalized, as demonstrated by the recent shameful destruction at Newport Spring. When Cherokee Sink was privately owned it was treated like a dump, and exposed to other destructive activities. Thankfully, it was purchased by the state and added to Wakulla Spring State Park for protection and management. Today, it is a scenic and safe recreation area, thanks to the sensitive management of state park staff. The restoration of Cherokee is a good example to follow for managing Horn Spring.

Decades of management experience demonstrate that public use of Horn Spring should "not" be authorized until the following criteria are accomplished.

- 1. Adequate staff must be available for oversight to avoid damage to the spring and vandalism of future facilities.
- 2. A sanitary facility must be available a distance from the spring for proper disposal of human waste for public health and spring protection. Release of effluent from the facility should not be permitted.
- The existing service road should be improved for staff access from the county road. No off-road use by motorized vehicles will be permitted. Visitor hiking and biking access along the service road is feasible.
- 4. The spring will be limited to low intensity use.
- 5. If swimming is permitted in the future, steps must be installed for access into the spring, and a rustic wooden railing installed along the south side of the spring to avoid erosion of the shoreline caused by trampling.
- 6. When staff is able to provide protection and management, hiking and paddling may be permitted.
- 7. Primitive camping on the river should not be permitted unless a state-ofthe-art sanitary facility is installed.
- 8. Research and monitoring of natural and cultural resources should be encouraged.

After these criteria are in place, the Horn Spring addition will provide wholesome recreation in the form of natural scenery appreciation, nature study, biking, hiking, paddling, and possibly swimming.

Jim A. Stevenson

# Florida springs@comcast.net

former Chief Naturalist, Florida State Parks former Chairman, Florida Springs Task Force former Director, Florida Springs Initiative Florida Springs Institute, Board of Directors Wakulla Springs Alliance, Board of Directors

August 17, 2018

# Natural Bridge Historical Society, Inc.

Citizen Support Organization



Please address all correspondence to: Natural Bridge Historical Society, Inc. c/o Robert L. Trapp, Registered Agent 815 East 7<sup>th</sup> Avenue Tallahassee, Florida 32303 btrapp@nbhscso.com

Board of Directors William Gifford, President 850-574-3792 Chris Ellrich, Vice President 850-321-0950 Robert L. Trapp, Secretary/Treasurer 850-222-6192 Mark Rominger, Director 850-877-1263 John Boger, Director 386-963-3654 Drew Bell, Director 386-647-6946 Carrie Cook, Director 850-728-0115

August 20, 2018

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Steven Cutshaw, Chief Office of Park Planning Florida Department of Environmental Protection Division of Recreation and Parks 3900 Commonwealth Boulevard, MS 525 Tallahassee, Florida 32399-3000

#### Dear Mr. Cutshaw:

Thank you for inviting the Natural Bridge Historical Society, Inc. (NBHS) to participate in the advisory group review of the draft management plan for the Horn Springs Addition to the Natural Bridge Historic State Park. The NBHS was incorporated in 1999 as a Citizen Support Organization for the purpose of preserving and promoting the historical, cultural, and recreational value of the Natural Bridge Historic State Park in cooperation with the Florida Park Service. This revered site marks the location of the second largest Civil War battle in Florida and one of the last battles of the Civil War. The Confederate victory here protected a significant area of North Florida and South Georgia from the severe economic losses suffered by many other regions of the South. The battle preserved Tallahassee as the only Southern capital east of the Mississippi not to succumb to armed conquest during the Civil War. While the majority of the Southern defenders consisted of well-trained Confederate infantry, cavalry, and artillery, they were augmented by local militia and cadets from the West Florida Seminary (Florida State University). Key to their participation in the battle was the defense of their homes and property. Union forces were part of a joint force expedition intent on engaging Confederate troops that had attacked at Cedar Keys and Fort Myers. Elements of the 2<sup>nd</sup> and 99<sup>th</sup> United States Colored Troops were landed at the St Marks lighthouse and marched into the interior. Failing to cross the St Marks River at Newport, they continued north to attempt a crossing at the Natural Bridge. Many of these men were ex-slaves fighting for the union and freedom. In a larger sense, the motives of the combatants on both sides of the battle represent a macrocosm of the complex political, economic, and cultural issues of the time. It is important to honor and preserve the memory of such men and events and learn from the lessons of history.

Since inception, the primary goal of the NBHS has been to encourage the State of Florida to acquire and protect the entire Natural Bridge battlefield. The purchases of the Rakestraw property in 2009 followed by the Gerrell property

in 2016 were milestones in this effort. With the acquisition and placement of the Horn Springs Addition under the management of the Division of Recreation and Parks (DRP), the original battlefield and its approaches are now, with minor out lot exceptions, protected State lands. Overall, the NBHS supports the draft management plan for the Horn Springs Addition. As such, our comments are limited to the following areas:

# Extreme care should be taken to ensure that the development of recreational access to the river run and hiking trails to the Horn Springs system do not adversely impact the historical aspects of the battlefield.

The draft management plan calls for improvements to the existing canoe/kayak launch and a new trail system to the Horn Springs including an interpretive Kiosk and parking for up to six vehicles at the trailhead. Each of these areas are on parts of the battlefield occupied or probed by the 2<sup>nd</sup> and 99<sup>th</sup> Infantry Regiments United States Colored Troops during the battle of Natural Bridge. As noted in the draft management plan (pg. 50), significant artifacts pertaining to the battle were located in the area adjacent to the existing canoe/kayak launch during the 2009-2010 archaeological metal detecting survey sponsored by the NBHS. While no official metal detecting survey has been conducted east of the prior Park boundaries, the literature search and interviews conducted by Arbuthnot et al. (2010) indicate that numerous artifacts relating to the battle have been recovered in the past from the area by private individuals. With Park boundaries now encompassing these areas, an archaeological metal detecting survey should be a high priority. This recommendation is in no way intended to forestall or delay plans for the canoe/kayak launch improvements to have minimal impact by using pervious materials rather concrete or asphalt. Also, we envision and highly recommend that the proposed trailhead kiosk include historical information regarding the movements and role played by the 2<sup>nd</sup> and 99<sup>th</sup> Infantry Regiments United States Colored Troops during the battle.

# Additional Archeological Metal Detecting Surveys

In addition to the positions occupied or probed by the 2<sup>nd</sup> and 99<sup>th</sup> Infantry Regiments United States Colored Troops west of the Natural Bridge, priority should be given to conducting archaeological metal detecting surveys of:

- 1. Confederate positions south of Natural Bridge Road running along the western edge of the Rakestraw chain link fence. Of particular interest is locating the position occupied by the Whitehead artillery battery which defines the extreme right flank of the Confederate defensive line of battle.
- 2. Confederate positions north of Natural Bridge Road included in the Horn Springs addition. Of particular interest is locating the position occupied by the Dunham artillery battery which defines the extreme left flank of the Confederate defensive line of battle.

# The structures on the north end of the original park property (ranger residence, shop, and equipment storage) should be removed and the area used for additional interpretive facilities.

With the Horn Springs addition, the complete Confederate battle line is now under the management of the DRP. The NBHS is in total agreement with elements in the draft management plan calling for additional interpretive signage and kiosks to further educate visitors to the Park. At present, the Park Service structures on the north end of the original park property represent an anachronism that detract from the interpretive experience. The NBHS recommends that these structures be removed and the area be restored to a more natural appearance. Because of its proximity to the Confederate left flank and the river run, the location would ideally support enhanced interpretive displays and additional picnic facilities. Existing utilities (electric, water, septic system) should be retained to support these additions.

## The Rakestraw House should remain in its current location and be made ADA compliant.

The draft management plan makes reference (pg. 71) to the "potential relocation of the Rakestraw House to the Special Event Area to remove it from the boundaries of the actual battlefield site". While implementation is highly unlikely during the period covered by the February 24, 2016 approved management plan due to cost and complexity, the NBHS does not support relocation and recommends removal of this sentence from the draft management plan. Since its acquisition and inclusion in the Park in 2009, the Rakestraw House at its current location has proven to be a valuable resource as a meeting space for park operations and volunteer events (pg. 63). In addition, the overlook of

the battlefield from the house provides an excellent vantage point for interpretive tours which are conducted by the Park Service and the CSO. Rather than relocating the Rakestraw House, long recommended improvements to the existing facility need to be made.

When the Rakestraw property was originally acquired in 2009 there was a big push by Park Management to use the Rakestraw House as a meeting and interpretive center for the expanded Park. As a first step, the NBHS was asked to purchase materials and provide volunteer labor to construct a wooden wheelchair ramp to provide handicap access to the house. When this request was determined to be impractical (a linear ramp providing access to the front porch would have extended the length of the building and a lower ramp to the back door would have extended several feet beyond the garage door), on February 18, 2010 the CSO purchased an electromechanical wheelchair lift from US Medical Supply at the cost of \$3999. Since its delivery, the wheelchair lift has been in storage in the garage of the Rakestraw House awaiting Park Service approval for installation. In an effort to renew attention to this matter, the CSO has recently provided Park Management with plans prepared on a volunteer basis by a professional architect for the internal renovation of the bathroom facilities conforming them to ADA requirements and the installation of the wheelchair lift to provide access at the front of the house. We also recommend the removal of the non-load bearing wall between the master bedroom and living area to provide a more open and accessible area for meetings and the display of interpretive materials pertaining to the battlefield. The NBHS is prepared to go forward with this project at the earliest possible opportunity and has and will continue to be willing to commit funds, labor, and materials for the project. Regardless of whether general public access to the Rakestraw House continues to be limited to meeting space for park operations and special events, ADA accessibility should be made a priority.

In closing, we greatly appreciate the opportunity to participate and provide input into the review of the draft management plan for the Horn Springs Addition to the Natural Bridge Historic State Park. The Natural Bridge Battlefield Historic State Park is very important to us and on behalf of the members and directors of the Natural Bridge Historical Society, Inc. we thank you for your diligent and continuing efforts to protect, manage, and enhance our Park.

Please feel free to contact me should you have any questions.

Sincerely,

William D. Sup

William "Buzz" Gifford, President Natural Bridge Historical Society, Inc.