

## **APPENDIX A**

### **PUBLIC SCOPING AND AGENCY COORDINATION**

Figure A-1. Scoping Letter



IN REPLY REFER TO:

## United States Department of the Interior

National Park Service  
Blue Ridge Parkway  
199 Hemphill Knob Road  
Asheville, North Carolina 28803



L7617  
PIN 10392

October 23, 2007

Dear Interested Party:

The National Park Service (NPS) proposes to implement a new trail plan (Trail Plan) for the Roanoke Valley section of the Blue Ridge Parkway (Parkway). The Trail Plan, which would be between the Roanoke Valley Greenway Commission (Commission) and the Parkway, would be from Stewarts Knob, Milepost 110.6 to Masons Knob, Milepost 126.2. The intent of this project is to develop a safe and integrated trail system that would provide critical linkages between the Roanoke Valley greenway trail network, Parkway trails, and the community. This trail system would provide the public with a greatly enhanced range of trail opportunities as well as provide Parkway trail planning, mapping and rehabilitation assistance from the Roanoke Valley Greenway Commission.

An Environmental Assessment (EA) will be prepared to describe the affected environment and analyze potential impacts associated with a No Action Alternative and two action alternatives.

The alternatives address unauthorized trail use between the park motor road and sites off of the Parkway, improvement and maintenance of existing trails, new trails and multi-use including mountain biking on the Chestnut Ridge Trail. This EA will analyze alternatives and the resulting decision will establish the future direction for how the NPS would work with the Commission, biking and horse advocacy groups and the community at large. As previously stated, a Trail Plan would be implemented that would provide a safe and integrated trail system linking Parkway trails, the Roanoke Valley Greenway Trail network and the community, as well as close unauthorized trails and designate authorized trail connections.

### Project Background

On November 1, 2001, the Roanoke Valley Greenway Commission and Blue Ridge Parkway signed a General Agreement allowing the Commission to assist with trail planning, mapping and rehabilitation under the direction of Parkway staff. In the spring of 2002, discussions were

initiated between Parkway staff and the Commission to explore options for development of an integrated system that would provide critical linkages between the two systems, providing the public with a greatly enhanced range of trail opportunities.

Inventory and assessment of the Roanoke trail system began in June 2002 in conjunction with an International Mountain Bicycling Association (IMBA) trail building school hosted at Explore Park. During the school many of the trails on and around the Parkway were walked and examined to determine the potential for a valley-wide trail system that connected to the Parkway.

A vision of several loop trails began to emerge, using portions of the Roanoke Greenway system and Blue Ridge Parkway lands. A draft “Roanoke Valley/Blue Ridge Parkway Trail Plan” had been completed by January 2004 and as a result of this the Chestnut Ridge Trail has been improved and the Wolf Creek Greenway connection has been constructed. Condition inventory and mapping on several Parkway trails has also been accomplished.

In fiscal year 2001 the Parkway initiated a general management plan (GMP). One of the components to be addressed in that planning process is trail use and management. As work progressed with the development of alternatives within the GMP, the question on how to proceed with trail planning in the Roanoke Valley had been a point of debate internally. Thus, the January 2004 draft “Roanoke Valley/Blue Ridge Parkway Trail Plan” has not been fully implemented by the NPS. From 2004 to 2006, further progress on the part of NPS management to implement the Roanoke trail planning initiative was delayed while awaiting the outcome of the GMP alternatives selection in regards to recreation and general park-wide trail proposals.

In January 2006, the Parkway decided to move forward with detailed trail planning and environmental compliance for the Roanoke Valley trails due to two specific reasons. First, after public criticism when Parkway staff closed an unauthorized social trail, the NPS decided to fully review the extent of unauthorized trails in the Roanoke Valley. A major problem was revealed as numerous unauthorized access trails connecting with public roads and private property were found to exist along the entire length of the Roanoke Valley section of the Parkway. To fully address the public’s desire for additional access to the Parkway motor road and trails, more in-depth and immediate planning and compliance would be required.

Secondly, NPS management approved the GMP alternative concepts, one of which proposes an integration of Parkway and Greenway trails and the potential for multi-use trails in the Roanoke Valley. The GMP establishes mission, purpose and significance parameters for the more detailed planning and compliance now underway with this proposed Trail Plan.

An initial public meeting was conducted in January 2006 to gather stakeholder’s ideas and issues related to Parkway trails and trail linkages with Greenways and the community. During 2006 Parkway planning staff conducted in-depth inventory and analysis on authorized and unauthorized trails on Parkway land in this area. In January 2007 Parkway staff worked with Roanoke County and Roanoke Valley Greenway Commission staff, and biking and equestrian stakeholder groups in a two-day design charrette. The intent of the charrette was to develop options for how best to proceed with trail planning and the outcome of that work established the preliminary alternatives to be presented and analyzed in the proposed Trail Plan/EA.

#### Preliminary Alternatives

Three preliminary alternatives for the proposed project are currently being considered by BLRI. The issue of unauthorized access trails will be addressed the same in all of the alternatives with the designation of new authorized trail connections being proposed in the two action alternatives.

Unauthorized trails will be closed once this proposed plan and environmental assessment analysis is completed.

The alternatives include:

1. Alternative A (No Action): NPS would continue to maintain with volunteers and present funding existing authorized trails with no new trail construction. There would be no new Roanoke Greenway connections to the Parkway trail system. Bicycle access to the motor road would only be allowed from existing at-grade public road connections to the Parkway.
2. Alternative B: Proposals in this alternative address current and future trail needs along the Roanoke Valley section of the Parkway from Milepost 110.6 to 126.2 in a comprehensive manner. Existing Parkway trails would be brought up to NPS standards utilizing volunteers and outside funding sources. Some abandoned trails on park land would be reestablished. In some locations multiple social trails would be consolidated and unneeded trails would be closed. New loop and connector trails would be constructed at several locations. New bicycle and pedestrian accesses and parking areas would be established at various locations to provide safe access to the motor road and trails. New trailhead parking for hikers and horseback users would be provided at various locations. Several connections between Parkway trails and the Roanoke Greenway trail system would be authorized.
3. Alternative C: Implement the same proposals as presented in Alternative B with the addition of a one-year pilot project. This pilot project would allow mountain bike use on Chestnut Ridge Trail for a period of one year, after which NPS management would decide whether or not to continue multi-use on this trail. The proposed Trail Plan/EA will identify the parameters that will be used to evaluate the affects the project would have on park resources, visitor use conflicts, Parkway staffing requirements to manage the multi-use trail, etc.

*Note:* Three Study Section Maps detailing more specifics of the preliminary alternatives are available online at the address below for public review.

### Public Scoping

Pursuant to the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality (CEQ) NEPA regulations, (40 Code of Federal Regulations (CFR) 1500 to 1508), and the National Park Service (NPS) NEPA compliance guidelines (DO-12), the NPS is presently conducting an Environmental Assessment (EA) for this project. The EA will investigate the potential for effects on any environmental resources resulting from this proposal.

We welcome your comments, suggestions, or other inputs concerning this project to help us identify issues of concern and interest and ensure that the EA thoroughly addresses potential effects of the proposal. Your participation will aid BLRI in making a well-informed decision about whether and how to proceed with this project.

If you would like to provide comments on this project or request a copy of the EA, you may do so using the NPS Planning, Environment, and Public Comment (PEPC) Internet-based system. Persons wishing to provide comments on the proposed project are asked to please submit all comments by **December 1, 2007**. Comments can be made directly online by going to the following link:

<http://parkplanning.nps.gov/projectHome.cfm?parkId=355&projectId=10392>.

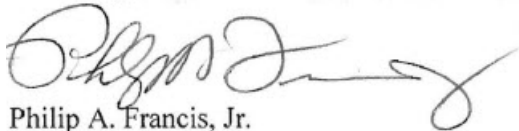
Written comments may also be submitted to:

Blue Ridge Parkway  
**Attn: Suzette Molling**  
199 Hemphill Knob Road  
Asheville, North Carolina 28803-8686

It is the practice of the NPS to make all comments, including the names and addresses of respondents who provide the comments, available for public review following the conclusion of the scoping process. Individuals may request that the NPS withhold their name and/or address from public disclosure. If you wish to do this, you must state this prominently at the beginning of your comment. Commentators using the PEPC website can make such a request by checking the box "keep my contact information private." The NPS will honor such requests to the extent allowable by law, but you should be aware that the NPS may still be required to disclose your name and address pursuant to the Freedom of Information Act.

Comments will also be accepted at an Open House Public Meeting to be held on Thursday, November 15, 2007. The public meeting will be held from 3 p.m. to 8 p.m. at Virginia's Explore Park Visitor Center Auditorium, Milepost 115.1 on the Blue Ridge Parkway. Members of the public may stop by at any time during these hours to meet with Parkway staff and share ideas.

Sincerely,

A handwritten signature in dark ink, appearing to read "Philip A. Francis, Jr.", written over a light gray rectangular background.

Philip A. Francis, Jr.  
Superintendent

Figure A-2. News Release



National Park Service  
U.S. Department of the Interior

Blue Ridge Parkway  
[www.nps.gov/blri](http://www.nps.gov/blri)

199 Hemphill Knob Road  
Asheville, NC 28803

## Blue Ridge Parkway News Release

October 23, 2007

For Immediate Release

Contact: David Anderson (828) 271-4779 ext. 217; email [j\\_david\\_anderson@nps.gov](mailto:j_david_anderson@nps.gov)

### Parkway Seeks Input for Roanoke Valley Trail Plan

(Asheville)—The Blue Ridge Parkway (BLRI) is seeking public input, through December 1, to identify issues and additional study that will be needed to develop an Environmental Assessment for a trail plan for the Roanoke Valley section of BLRI. The trail plan, which would be between the Roanoke Valley Greenway Commission and the BLRI, would be from Stewarts Knob, Milepost 110.6 to Masons Knob, Milepost 126.2. The intent of this project is to develop a safe and integrated trail system that would provide critical linkages between the Roanoke Valley Greenway trail network, Parkway trails and the community. This trail system would provide the public with a greatly enhanced range of trail opportunities as well as provide BLRI trail planning, mapping and rehabilitation assistance from the Roanoke Valley Greenway Commission.

Parkway officials said that “Visitor demands for varied use of trails and for biking access to the motor road is greater in Roanoke right now than anywhere else on the Parkway, so it is imperative that we work jointly with the public to develop a safe and comprehensive trail plan for the Valley.”

The project scoping phase, now underway, is the initial step in the development of an Environmental Assessment that will analyze alternatives and their potential impacts.

For more information and to comment on this project, visit the National Park Service website: <http://parkplanning.nps.gov>. Select Blue Ridge Parkway from the park dropdown menu and then click on project title “Roanoke Valley / Blue Ridge Parkway Trail Plan Environmental Assessment.”

Information is also available, and comments may be made by writing to: Blue Ridge Parkway, ATTN: Suzette Molling, 199 Hemphill Knob Road, Asheville, NC 28803. Comments must be postmarked by December 1.

Comments are typically treated as a public record and made available for public review. Individuals may request that the National Park Service withhold their name and address from disclosure. Such requests will be honored to the extent allowable by law.

Comments will also be accepted at an Open House Public Meeting to be held on Thursday, November 15, 2007. The public meeting will be held from 3 p.m. to 8 p.m. at Virginia’s Explore Park Visitor Center Auditorium, Milepost 115.1 on the Blue Ridge Parkway. Members of the public may stop by at any time during these hours to meet with Parkway staff and share ideas.

#### EXPERIENCE YOUR AMERICA

The National Park Service cares for special places saved by the American people so that all may experience our heritage.



Figure A-3. Mt. Rogers Planning District Commission Comment Letter



	<b>MOUNT ROGERS PLANNING DISTRICT COMMISSION</b>	
	RONALD R. CATRON, Chairman KENNETH O. REYNOLDS, Vice-Chairman	PAUL W. HURLEY, Treasurer DAVID A. BARRETT, Executive Director
<b>1021 Terrace Drive</b>	<b>Marion, Virginia 24354</b>	<b>Phone 276-783-5103    Fax 276-783-6949</b>
November 20, 2007		
Suzette Molling Blue Ridge Parkway 199 Hemphill Knob Road Asheville, NC 28803-8686		
RE: Trail Plan for the Roanoke Valley section of the Blue Ridge Parkway in Virginia		
Dear Ms. Molling:		
The Mount Rogers Planning District Commission has reviewed the information supplied for the Trail Plan for the Roanoke Valley section of the Blue Ridge Parkway in Virginia. To the best of our knowledge the trail plan does not impact the Mount Rogers Planning District.		
We recommend and support the Trail Plan for the Roanoke Valley section of the Blue Ridge Parkway in Virginia.		
Sincerely,		
		
David A. Barrett Executive Director		
DAB/ge		
<p style="text-align: center;">SERVING LOCAL GOVERNMENTS IN BLAND – CARROLL – GRAYSON – SMYTH – WASHINGTON – WYTHE BRISTOL – GALAX</p>		

Figure A-4. Roanoke Valley Greenways Comment Letter



1206 KESSLER MILL ROAD

SALEM, VA 24153

540-387-6060

540-387-6146 (FAX)

[www.greenways.org](http://www.greenways.org)

November 30, 2007

To: Blue Ridge Parkway  
c/o Suzette Molling

Re: Comments on the Blue Ridge Parkway Trail Plan and Maps

Thank you to staff for providing opportunity for the public to review the trail maps at the November 15, 2007 input session. Several Greenway Commission members attended this meeting. The Greenway Commission remains committed to working with the Blue Ridge Parkway on improving the Parkway trail system and providing linkages to greenways. The Commission is also supportive of the comments provided to you in July from the Roanoke Trails Group.

Additional comments based on review of these final maps, starting on the northern end.

1. We agree in concept with the closure of unauthorized trails, but want to be sure that Parkway staff is the party responsible for taking this action. This is a very contentious issue for those people using access points that have existed for years. We understand that people do not want to have to drive to an access point when the Parkway trail is directly adjacent to their property, and thus think it will be difficult for the Parkway to enforce the closures. However, as we work together to improve trail conditions, use will probably increase and illegal activity may thus decrease.
2. As stated previously in the Roanoke Trails Group comments of July 10, 2007, we believe that a paved access point for bicyclists in the Mountain View area is greatly needed. Mountain View road improvements have recently been completed, including bicycle lanes, and this has become even more important to bicyclists as a loop connection back to town. We recommend that the new paved access at the Vinton office be completed prior to closure of the "Deer Trail". While the closure is included in all alternatives, the new access is only in Alternatives B and C. All alternatives need a legal and safe way for bicyclists to exit the Parkway.
3. Between Hardy Road and the river, we consider that this trail exists but needs maintenance and reopening, just as we helped you with maintenance and reopening of the trail between Stewart's Knob and Route 24. This maintenance and reopening should be allowed under Alternative A, as well as B and C.
4. The plan should clearly specify that a trail bridge is needed at the river. We understand that funding



is not currently available, but the bridge should be in the plan for all alternatives.

5. The existing crossing at Rutrough Road is in a dangerous location. When in the field with the group, we considered moving the crossing of Rutrough west of the Parkway. The map indicates assessing the safety of the new social trail crossing of the Parkway, but I would suggest that relooking at Rutrough needs to be included in that assessment.

6. The trail currently exists between Jae Valley Road and Sizemore Road and thus should not be yellow. Alternative A should indicate the trail exists and needs maintenance.

7. The Roanoke Trails Group requested consideration of crossing Jae Valley Road along the edge of the Parkway. This is one of the most dangerous road crossings and needs either safety improvements with VDOT or allowance for staying on the Parkway shoulder.

8. We would like the Parkway to maintain an option of building new pedestrian trails on Roanoke Mountain in the future.

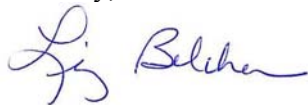
9. On the Mill Mountain end, where greenway connections are shown on each side of Mill Mountain Spur Road, the box points to the wrong trail. (The colors are correct.) We request that this connection be allowed under all alternatives.

10. We request that the access from West Ridge Road behind the campground be developed as authorized access under all alternatives.

11. As noted during the public meeting, the Greenway Plan includes a “Perimeter Trail”, a portion of which is along the Parkway from Adney Gap to Salt Pond Road on the National Forest. Much of this is outside your study area, but some parts – from 220 to Buck Mtn Overlook and from Starlight Lane to Masons Knob Overlook – are within the current study area. Thus these areas could be marked with boxes that indicate future Parkway trail development in conjunction with Roanoke Valley Greenways.

Many thanks to Deirdre and David for their hard work in assessing the conditions and building relationships with local trail users. The Greenway Commission looks forward to continuing our cooperative relationship.

Sincerely,



Liz Belcher  
Roanoke Valley Greenway Coordinator

Figure A-5. VADEQ Comment Letter



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 10009, Richmond, Virginia 23240

Fax (804) 698-4500 TDD (804) 698-4021

www.deq.virginia.gov

L. Preston Bryant, Jr.  
Secretary of Natural  
Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

October 30, 2007

Blue Ridge Parkway  
Attn: Suzette Molling  
199 Hemphill Knob Road  
Asheville, North Carolina 28803

RE: Trail Plan for the Roanoke Valley section of the Blue Ridge Parkway in Virginia.

Dear Ms. Molling:

This is in response to the October 23, 2007 letter from Mr. Phillip A. Francis, Jr. announcing the preparation of an Environmental Assessment for the proposed Trail Plan for the Roanoke Valley section of the Blue Ridge Parkway (Parkway) in Virginia, and soliciting comments on the scope of the document.

According to the letter, the National Park Service (NPS) proposes to develop a Trail Plan for the Roanoke Valley section of the Parkway from Stewarts Knob (Milepost 110.6) to Masons Knob (Milepost 126.2). The intent of this project is for the NPS to work with the Roanoke Valley Greenway Commission, biking and horse advocacy groups, and the community at large in order to develop a safe and integrated trail system that would provide critical linkages between the Roanoke Valley greenway trail network, Parkway trails, and the community. This trail system would provide the public with a greatly enhanced range of trail opportunities as well as provide Parkway trail planning, mapping and rehabilitation assistance from the Roanoke Valley Greenway Commission.

The role of the Virginia Department of Environmental Quality (DEQ) in relation to the project under consideration is that DEQ's Office of Environmental Impact Review (this Office) will coordinate Virginia's review of any environmental document prepared pursuant to the National Environmental Policy Act (NEPA) and comment to the NPS on behalf of the Commonwealth.

Environmental Review and Scoping

We are sharing Mr. Francis' letter with selected state and local Virginia agencies, which include the following:

- Department of Environmental Quality:

Ms. Suzette Molling  
Page 2

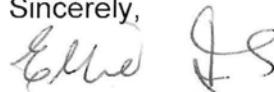
- Office of Environmental Impact Review
- Southwest Regional Office
- West Central Regional Office
- South Central Regional Office
- Valley Regional Office
- Air Division
- Waste Division
- Department of Game and Inland Fisheries
- Department of Conservation and Recreation:
  - Division of Soil and Water Conservation
  - Division of Planning and Recreation Resources
  - Division of Natural Heritage
- Department of Agriculture and Consumer Services
- Department of Transportation
- Marine Resources Commission
- Department of Historic Resources
- Mount Rogers Planning District Commission
- West Piedmont Planning District Commission
- New River Valley Planning District Commission
- Roanoke Valley-Alleghany Regional Commission
- Virginia's Region 2000 Local Government Council
- Central Shenandoah Planning District Commission
- Thomas Jefferson Planning District Commission.

In order to ensure an effective coordinated review of the Environmental Assessment, we will require 24 copies of the document when it is published. The document should include U.S. Geological Survey topographic maps as part of its information. We recommend, as well, that project details unfamiliar to people outside the NPS be adequately described. While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the NEPA document for the proposed project.

If you have questions about the environmental review process, please feel free to call me at (804) 698-4325 or Ernie Aschenbach of this Office at (804) 698-4326.

I hope this information is helpful to you.

Sincerely,



Ellie L. Irons, Manager  
Office of Environmental Impact Review

cc: Michael Overstreet, DEQ-SWRO  
Kevin Harlow, WCRO  
Amanda Gray SCRO  
Ronald Phillips, VRO

Ms. Suzette Molling  
Page 3

Kotur S. Narasimhan, DEQ-Air  
Paul Kohler, DEQ-Waste  
Amy Ewing, DGIF  
Robbie Rhur, DCR  
Tony Watkinson, MRC  
Ethel R. Eaton, DHR  
Keith Tignor, VDACS  
Mary Stanley, VDOT  
David Barrett, Mount Rogers PDC  
Robert Dowd, West Piedmont PDC  
Annette Perking, New River Valley PDC  
Wayne Strickland, Roanoke Valley-Alleghany Regional Commission  
Gary Christie, Virginia's Region 2000 Local Government Council  
A. Ray Griffin Jr., Central Shenandoah Planning District Commission  
Harrison Bright Rue, Thomas Jefferson Planning District Commission



Figure A-6. International Mountain Biking Association Comment Letter



November 30, 2007

Blue Ridge Parkway  
Attn: Suzette Moiling  
199 Hemphill Knob Road  
Asheville, North Carolina 28803-8686

Dear Blue Ridge Parkway:

The International Mountain Bicycling Association (IMBA) submits the following comments on the Roanoke Valley Trail Plan. IMBA requests the National Park Service (NPS) adopt Alternative C and permit mountain bicycling through a one-year pilot project. The final Environmental Assessment (EA) should identify objective, science-based criteria by which mountain bicycling use will be evaluated.

IMBA is a national and international organization dedicated to creating, enhancing, and preserving trail experiences for mountain bikers worldwide. We have 80,000 individual supporters, 750 affiliate clubs, and 300 dealer members.

IMBA and the NPS signed a General Agreement in 2005 to identify appropriate opportunities for responsible mountain bicycling on NPS lands. In the last two and a half years, we have received numerous inquiries from park superintendents interested in mountain bicycling. IMBA is collaborating with three parks on long-term pilot projects and just completed nine informational and trailwork visits in 2007 at NPS units across the country.

Mountain bicycling is a quiet, low-impact, human-powered activity compatible with resource conservation and a healthy lifestyle. In an era when many NPS visits are confined to motor vehicle travel, mountain bicycling provides an appropriate mode of recreation for personal exploration and the formation of emotional connections with our national parks.

At least 44 NPS units allow mountain bicycling on some dirt roads or trails. A full list can be found at: <http://www.imba.com/resources/agencies/nps.html>

#### **The Chestnut Ridge Loop is Appropriate for Mountain Bicycling**

IMBA strongly supports the adoption of Alternative C that would permit bicycling on the Chestnut Ridge Trail via a one-year pilot project. A one-year demonstration period will allow the NPS to collect data and feedback from visitors, facilitating an informed decision regarding long-term use of the trail.

The Blue Ridge Parkway has become a community greenway as the city has grown around it and the park has to adapt its management to accommodate its new role as a multi-modal transportation corridor and frontcountry recreation facility. The Chestnut Ridge Loop is a system that provides neighborhood connectivity to the Blue Ridge Parkway and adjacent trails on other



lands. This trail is well suited for shared-use management and can accommodate bicycling without adverse social and environmental impacts. Chestnut Ridge is surrounded by several successful shared-use loop systems. There are also significant hiking-only opportunities in close proximity that offer superior outdoor experiences.

Together with Roanoke Greenways and the NPS Rivers, Trails and Conservation Assistance (RTCA) program, IMBA has been involved with trails planning at Blue Ridge Parkway since at least 2001. The Chestnut Ridge loop was rebuilt by Trail Solutions and the private trails contractor Trail Dynamics in 2004 to bring the trail up to a sustainable, shared-use standard. Specifically, this process involved rerouting and rehabilitating sections of the trail to meet stringent guidelines for trail design that have been proven in numerous parks around the world and tested in scientific journals.

### **Connecting the Blue Ridge Parkway and Local Trail Systems**

In its decision, the NPS should also consider the importance of mountain bicycling access that connects with adjacent national forest lands. The Blue Ridge Parkway corridor is a critical component of the larger regional trail system, connecting Harrisonburg, Virginia with Asheville, North Carolina. Allowing cyclists to cross NPS land on singletrack would benefit local communities that draw mountain bicyclists and other trail users.

The NPS should also consider the potential and need for additional trails open to bicycling. Throughout the length of the Blue Ridge Parkway, many potential loops are not legal for the sake a few hundred feet of trail. The NPS will need to address this situation at some point and this Trails Plan is a great time to develop a successful precedent. Opening some of these trail segments to bicycle use will greatly enhance the regional trail system and disperse use along multiple trails.

### **Developing Trails Stewardship**

Across the country, and especially at the Blue Ridge Parkway, many visitors never experience their parks from beyond their cars and RVs. The formation of meaningful connections with our nation's unique natural, historic and cultural resources is best facilitated out in the open, through active recreation. Opening the Chestnut Ridge loop to bicycling will encourage more users to enjoy the Blue Ridge Parkway and foster in them a desire to give back to the park.

Mountain bicyclists are prolific volunteers and can help the NPS. Bicycling on the Chestnut Ridge Trail will attract volunteers to maintain the trail and act as stewards of this public land. Users that are deeply involved in the park are most likely to invest time and effort to maintain facilities and lobby for improvements.

### **Environmental Impacts of Mountain Bicycling**

Science has shown that bicycling has similar environmental impacts as hiking and far less than equestrian or OHV use. The most robust and well-designed study to date was conducted by Dr. Jeffrey Marion at Virginia Tech and funded by the National Park Service. Dr. Marion's research



shows bicycle trails at Big South Fork National River and Recreation Area to be the least eroded, narrowest, and have the least amount of muddiness of all trails. Dr. Marion took extensive measurements and observations at 500-foot increments on a large random sample of trails, including hiking, horse, ATV and multi-use trails (Marion, 2006).

Another recent comprehensive study was conducted by recreational ecologists Dave White (Arizona State University) and Pam Foti (Northern Arizona University). They led a three-year research project titled "A Comparative Study of Impacts to Mountain Bike Trails in Five Common Ecological Regions of the Southwestern U.S." Their research, published in the summer 2006 Journal of Park and Recreation Administration (Volume 24, Number 12), measured trail erosion and other impacts on 31 trails used for mountain biking in the southwestern U.S. The study concludes that, "certain impacts to mountain bike trails, especially width, are comparable or less than hiking or multiple-use trails, and significantly less than impacts to equestrian or off-highway vehicle trails" (White et al, 2006).

### **User Conflict Research**

IMBA understands that some stakeholder groups are concerned about the possibility for user conflict on NPS trails. Through our two decades of developing and compiling the best management practices for mountain biking, it is clear that multiple uses can coexist on trails and develop a cohesive community of trail users.

Scientific inquiry into user conflict reveals a disconnect between perception and experience. Gordon Cessford, scientist for the New Zealand Department of Conservation, conducted a survey of 370 hikers on a long-distance trail where mountain biking was allowed on a trial basis. This research was published in the peer-reviewed Journal of Natural Conservation. Dr. Cessford found that hikers' opinions about mountain bikers were quite favorable. Eighty-eight percent of hikers who encountered a mountain biker reported it did not cause them dissatisfaction. Among those who did not encounter a mountain biker, 69 percent reported it would not cause them dissatisfaction. Dr. Cessford's research showed that hikers who encountered a mountain biker were actually *more* favorable to that use than those who didn't. (Cessford, 2002)

Roger Moore, Professor of Parks, Recreation and Tourism Management at North Carolina State University, has compiled the most comprehensive literature review of user conflict studies and distilled from it 12 principles for reducing conflicts. The very first principle begins, "Do not treat conflict as an inherent incompatibility among different trail activities." (Moore, 1994) No principle recommends banning uses as a productive course of action.

Though there may be isolated exceptions, there is little or no need to prohibit mountain biking on the vast majority of trails at the expense of other user groups.

### **Trail Design as a Tool to Mitigate User Conflict**

The key to minimizing potential user conflict is to design trails that minimize speed differential between modes of use: when trail users are moving at similar speeds, reaction times, stopping distances and harmonious interactions can occur. Unfortunately, many of the existing trails on

Blue Ridge Parkway property do not display this level of design integration. Many or most were not designed at all; simply tramped in by visitors. While we would never allow this to be the design principle behind roads (e.g. we design residential roads for a safe speed and passage of vehicles at around 30 mph, not for the potential for 75 mph traffic), we have allowed environmental and social sustainability on trails to be pushed by the wayside in order to allow for the legitimate existence of whatever path has been trod.

The Chestnut Ridge trail design represents the new standard of trail design knowledge that takes these factors into account and should be a precedent—both in design and management—that can serve as a model for all future Blue Ridge Parkway trail system improvements. To not do so would represent a close-minded view typical of 50 years in the past and result in both increased natural resource degradation and minimizing the potential use and enjoyment of the Blue Ridge Parkway for the American public.

### Conclusion

Thank you for the opportunity to submit these comments. IMBA appreciates the agency's willingness to work with our organization and other community stakeholders to explore the possibility of bicycling on narrow dirt trails at the Blue Ridge Parkway. Please do not hesitate to contact us if you have any questions regarding the suggestions outlined in this letter.

Sincerely,



Drew Vankat  
Policy Analyst  
drew@imba.com  
303-545-9011



Rich Edwards  
Trail Specialist – IMBA Trail Solutions  
rich@imba.com  
540-421-6067

**Figure A-7. Roanoke Planning Building & Economic Development Comment Letter**



**PLANNING BUILDING AND ECONOMIC DEVELOPMENT**

Noel C. Taylor Municipal Building  
215 Church Avenue, SW, Room 166  
Roanoke, Virginia 24011  
540.853.1730 fax 540.853.1230  
planning@roanokeva.gov

November 30, 2007

Ms. Suzettte Molling  
Blue Ridge Parkway  
199 Hemphill Knob Road  
Asheville, North Carolina 28803-8686

Dear Ms. Molling:

Subject: Roanoke Valley, Blue Ridge Parkway Trail Plan /  
Environmental Assessment

The Blue Ridge Parkway trails contribute greatly to a high quality of life for Roanoke's residents and visitors, and are critical economic development and tourism assets for our region's future. The City of Roanoke recognizes that these assets are unique, and that the Blue Ridge Parkway Trail Plan gives us a chance to work with the National Park Service to protect our natural environment and promote cultural, social, economic, and recreational opportunities that will encourage present and future generations to choose Roanoke as their home.

The City of Roanoke plans to promote and improve access to trails to link the region's parks, rivers, greenways, creeks, natural areas, business centers, schools and other institutions. In keeping within the spirit and recommendations of the Virginia Outdoors Plan, the Blue Ridge Parkway Trails should be linked and integrated into a comprehensive network of greenways, trails, bikeways and pedestrian facilities throughout the Roanoke Valley to maximize their benefit. The City has recently adopted both the 2007 Comprehensive Parks and Recreation Master Plan and the Mill Mountain Management Plan with express goals of providing connections to trails on Chestnut Ridge, the Blue Ridge Parkway and Explore Park. We believe that these connections will promote a healthier lifestyle and a greater appreciation of our natural heritage for our residents and visitors. Accordingly, we respectfully recommend and make the following comments on the Roanoke Valley, Blue Ridge Parkway Trail Plan/Environmental Assessment.

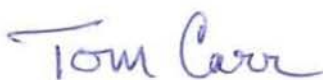
- The City supports approval of Trail Plan Alternative C. The City supports multi-use of the Chestnut Ridge trail and other parkway trails.




- Our Parks and Recreation Department has developed a trail assessment program based upon best management practices from both the International Mountain Bike and U.S.D.A. Forest Service for designing and maintaining sustainable trails for multiple uses in concert with the Roanoke Valley Greenways Commission. Parks and Recreation has and will continue to commit its staff and trail volunteer network to assisting the National Park Service with applying this assessment tool to Chestnut Ridge and other Parkway trails to promote multi-use of these facilities.
- Our Parks and Recreation Department serves as an active member of the Roanoke Valley Greenways Commission and assisted with the coordination and implementation of an existing cooperative trails management agreement with the Blue Ridge Parkway.
- The City recommends that the National Park Service authorize the completion of the Wood Thrush Trail as a multi-use trail from Mill Mountain across property leased to the National Park Service to Yellow Mountain Road, coordinated through our Parks and Recreation Department within this fiscal year. The trail currently terminates on Fishburn Parkway. Allowing the City to complete this link of less than 1000 feet will connect Chestnut Ridge and the Roanoke River Greenway with over two miles of woodland trail and will be a major factor in achieving our goals.
- The City supports improving the wayfinding signage at Chestnut Ridge to provide better directions for users connecting to the City's Fern Park, Ridgeline Trail and Wood Thrush Trails.
- The City supports National Park Service efforts to improve trail mapping, brochures, trail user education and signage to encourage public enjoyment of these resources.
- The City urges the National Park Service to legitimize social trails when feasible within their trails management plan process. Many of these connections have been in existence for years, they enhance networking with other trails, and they represent the healthy desire of citizens for access to enjoy the natural resources that the Parkway offers.

We appreciate the opportunity to make these comments and recommendations and the National Park Service for undertaking this planning effort. Please let us know if you have any questions.

Sincerely,



Thomas N. Carr, AICP, Director  
Planning, Building and Development



Steve Buschor, Director  
Parks and Recreation

pc: Darlene Burcham, City Manager  
Donnie Underwood, Parks and Greenways Planner  
Members, City Planning Commission  
Parks and Recreation Advisory Board

**Figure A-8. Roanoke Valley–Alleghany Regional Commission Comment Letter**

	<b>Shane Sawyer</b> < <a href="mailto:ssawyer@rvarc.org">ssawyer@rvarc.org</a> > 11/30/2007 04:47 PM EST	To: deirdre_hewitt@nps.gov cc: Subject: Roanoke Valley, Blue Ridge Parkway Trail Plan / Environmental Assessment
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**Roanoke Valley, Blue Ridge Parkway Trail Plan / Environmental Assessment  
Comments from the Roanoke Valley-Alleghany Regional Commission**

The Roanoke Valley-Alleghany Regional Commission (RVARC) has and continues to work closely with the Roanoke Valley Greenway Commission and the respective local governments in greenway planning efforts in the region. Most recently the Regional Commission acquired funding for, and assisted with, the *2007 Update to the Roanoke Valley Conceptual Greenway Plan*. As outlined in NPS literature, the intent of the trail plan project is to develop a safe and integrated trail system that would provide critical linkages between the Roanoke Valley greenway trail network, Parkway trails, and the community. The *2007 Update to the Roanoke Valley Conceptual Greenway Plan* documents previous and current efforts and agreements between the Greenway Commission and the Blue Ridge Parkway to provide access and connectivity between area greenways and Blue Ridge Parkway trails, as well as the benefits, challenges, and next steps in doing so. Moreover, the Greenway Commission, Pathfinders for Greenways, and local government staff have provided financial, volunteer, and other assistance in rehabilitating and maintaining trails, providing needed signage, and other trail improvements. To this end, and based on discussion with the Greenway Commission and member governments, the Regional Commission supports **Alternative C** as quoted below:

**Alternative C:** Implement the same proposals as presented in Alternative B with the addition of a one-year pilot project. This pilot project would allow mountain bike use on Chestnut Ridge Trail for a period of one year, after which NPS management would decide whether or not to continue multi-use on this trail. The proposed Trail Plan/EA will identify the parameters that will be used to evaluate the affects the project would have on park resources, visitor use conflicts, Parkway staffing requirements to manage the multiuse trail, etc.

If you have any questions, please contact Shane Sawyer, Regional Planner II, at [ssawyer@rvarc.org](mailto:ssawyer@rvarc.org) or 540.3434417.



Figure A-9. THPO Consultation Letters



IN REPLY REFER TO

United States Department of the Interior

National Park Service  
Blue Ridge Parkway  
199 Hemphill Knob Road  
Asheville, North Carolina 28803



H4217

June 3, 2010

Governor George Blanchard  
Absentee- Shawnee Tribe of Oklahoma  
2025 South Gordon Cooper Drive  
Shawnee, OK 74801 64865

Dear Governor Blanchard:

Federal regulations for the implementation of Section 106 of the National Historic Preservation Act of 1966, as amended, require consultation with federally recognized American Indian tribes (36 CFR 800.2) on a government-to-government basis. The administration of the Blue Ridge Parkway is committed to honoring in full good faith its obligations and responsibilities toward the Absentee-Shawnee Tribe of Oklahoma under all United States laws, regulations, and policies. As part of those responsibilities, I am writing to invite the Absentee-Shawnee Tribe of Oklahoma to participate in developing a programmatic agreement for the Blue Ridge Parkway's proposed Roanoke Valley Greenway Trail project.

Blue Ridge Parkway is seeking the participation of your Nation, the Tuscarora Nation, Eastern Shawnee Tribe of Oklahoma, Catawba Indian Nation, the United Keetoowah Band of Cherokee Indians, Cherokee Nation, Eastern Band of Cherokee Indians, and the Shawnee Tribe. The Virginia State Historic Preservation Office and the Advisory Council of Historic Preservation are also being asked to participate.

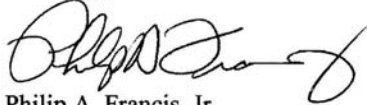
The Parkway proposes development of a multi-use trail network, linking the Parkway and the Roanoke Valley Greenway trail network. The project would include establishing and continuing to maintain approximately 30 miles of pedestrian and horse trails, authorizing several greenway connections which would accommodate pedestrians and provide bicycle access to the Parkway motor road, and authorizing mountain-bike use adjacent to the Roanoke River Parkway. The Roanoke Valley trail system is located between Mileposts (MP) 110.6 and 126.2, Section 1-M, in Roanoke County, Virginia.

The park intends to prepare a Programmatic Agreement (PA) to address potential effects on cultural resources, primarily archeological components, of the proposed project. Preparation of a PA is necessary since effects on historic properties cannot be fully determined before the project is initiated. In addition, the process and documentation required for the preparation of an Environmental Assessment as required by the National



Environmental Protection Act will be used to comply with the requirements of §106 of the National Historic Preservation Act. I have attached a draft scoping letter for the Environmental Assessment. If the Absentee-Shawnee Tribe of Oklahoma wishes to participate in development of the PA, please write to me or contact Cultural Resource Specialist Steven Kidd at 828-271-4779 x264 or [steven\\_kidd@nps.gov](mailto:steven_kidd@nps.gov).

Sincerely,



Philip A. Francis, Jr.  
Superintendent

cc: THPO  
Karen Kaniatobe, ([kkaniatobe@astribe.com](mailto:kkaniatobe@astribe.com))



IN REPLY REFER TO

## United States Department of the Interior

National Park Service  
Blue Ridge Parkway  
199 Hemphill Knob Road  
Asheville, North Carolina 28803



H4217

June 3, 2010

Chief Donald Rogers  
Catawba Indian Nation  
996 Avenue of the Nations  
Rock Hill, SC 29730-7645

Dear Chief Wickliffe:

Federal regulations for the implementation of Section 106 of the National Historic Preservation Act of 1966, as amended, require consultation with federally recognized American Indian tribes (36 CFR 800.2) on a government-to-government basis. The administration of the Blue Ridge Parkway is committed to honoring in full good faith its obligations and responsibilities toward the Catawba Indian Nation under all United States laws, regulations, and policies. As part of those responsibilities, I am writing to invite the Catawba Indian Nation to participate in developing a programmatic agreement for the Blue Ridge Parkway's proposed Roanoke Valley Greenway Trail project.

Blue Ridge Parkway is seeking the participation of your Nation, the Tuscarora Nation, Eastern Shawnee Tribe of Oklahoma, Absentee-Shawnee Tribe of Oklahoma, the United Keetoowah Band of Cherokee Indians, Cherokee Nation, Eastern Band of Cherokee Indians, and the Shawnee Tribe. The Virginia State Historic Preservation Office and the Advisory Council of Historic Preservation are also being asked to participate.

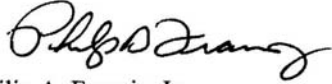
The Parkway proposes development of a multi-use trail network, linking the Parkway and the Roanoke Valley Greenway trail network. The project would include establishing and continuing to maintain approximately 30 miles of pedestrian and horse trails, authorizing several greenway connections which would accommodate pedestrians and provide bicycle access to the Parkway motor road, and authorizing mountain-bike use adjacent to the Roanoke River Parkway. The Roanoke Valley trail system is located between Mileposts (MP) 110.6 and 126.2, Section 1-M, in Roanoke County, Virginia.

The park intends to prepare a Programmatic Agreement (PA) to address potential effects on cultural resources, primarily archeological components, of the proposed project. Preparation of a PA is necessary since effects on historic properties cannot be fully determined before the project is initiated. In addition, the process and documentation required for the preparation of an Environmental Assessment as required by the National Environmental Protection Act will be used to comply with the requirements of §106 of the National Historic Preservation Act. I have attached a draft scoping letter for the Environmental Assessment. If the Catawba Indian Nation wishes to participate in

**TAKE PRIDE<sup>®</sup>**  
**IN AMERICA** 

development of the PA, please write to me or contact Cultural Resource Specialist Steven Kidd at 828-271-4779 x264, or [steven\\_kidd@nps.gov](mailto:steven_kidd@nps.gov)

Sincerely,

A handwritten signature in black ink, appearing to read "Philip A. Francis, Jr.", written in a cursive style.

Philip A. Francis, Jr.  
Superintendent

cc: THPO  
Dr. Wenonah G. Haire, Jr., Director, Cultural Preservation





IN REPLY REFER TO

## United States Department of the Interior

National Park Service  
Blue Ridge Parkway  
199 Hemphill Knob Road  
Asheville, North Carolina 28803



H4217

June 3, 2010

Principal Chief Chad "Corn tassle" Smith  
Cherokee Nation  
17675 South Muskogee Avenue  
Tahlequah, OK 74464

Dear Principal Chief Smith:

Federal regulations for the implementation of Section 106 of the National Historic Preservation Act of 1966, as amended, require consultation with federally recognized American Indian tribes (36 CFR 800.2) on a government-to-government basis. The administration of the Blue Ridge Parkway is committed to honoring in full good faith its obligations and responsibilities toward the Cherokee Nation under all United States laws, regulations, and policies. As part of those responsibilities, I am writing to invite the Cherokee Nation to participate in developing a programmatic agreement for the Blue Ridge Parkway's proposed Roanoke Valley Greenway Trail project.

Blue Ridge Parkway is seeking the participation of your Nation, the Tuscarora Nation, Eastern Shawnee Tribe of Oklahoma, Absentee-Shawnee Tribe of Oklahoma, Catawba Indian Nation, the United Keetoowah Band of Cherokee Indians, Eastern Band of Cherokee Indians, and the Shawnee Tribe. The Virginia State Historic Preservation Office and the Advisory Council of Historic Preservation are also being asked to participate.

The Parkway proposes development of a multi-use trail network, linking the Parkway and the Roanoke Valley Greenway trail network. The project would include establishing and continuing to maintain approximately 30 miles of pedestrian and horse trails, authorizing several greenway connections which would accommodate pedestrians and provide bicycle access to the Parkway motor road, and authorizing mountain-bike use adjacent to the Roanoke River Parkway. The Roanoke Valley trail system is located between Mileposts (MP) 110.6 and 126.2, Section 1-M, in Roanoke County, Virginia.

The park intends to prepare a Programmatic Agreement (PA) to address potential effects on cultural resources, primarily archeological components, of the proposed project. Preparation of a PA is necessary since effects on historic properties cannot be fully determined before the project is initiated. In addition, the process and documentation required for the preparation of an Environmental Assessment as required by the National Environmental Protection Act will be used to comply with the requirements of §106 of the National Historic Preservation Act. I have



attached a draft scoping letter for the Environmental Assessment. If the Cherokee Nation wishes to participate in development of the PA, please write to me or contact Cultural Resource Specialist Steven Kidd at 828-271-4779 x264, or [steven\\_kidd@nps.gov](mailto:steven_kidd@nps.gov).

Sincerely,



Philip A. Francis, Jr.  
Superintendent

cc: Policy Analyst/NAGPRA Representative, Dr. Richard Allen





IN REPLY REFER TO

## United States Department of the Interior

National Park Service  
Blue Ridge Parkway  
199 Hemphill Knob Road  
Asheville, North Carolina 28803



H4217

June 3, 2010

Principal Chief Michelle Hicks  
Eastern Band of Cherokee Indians  
Qualla Boundary Reservation  
88 Council House Loop Road  
Cherokee, NC 28719

Dear Principal Chief Hicks:

Federal regulations for the implementation of Section 106 of the National Historic Preservation Act of 1966, as amended, require consultation with federally recognized American Indian tribes (36 CFR 800.2) on a government-to-government basis. The administration of the Blue Ridge Parkway is committed to honoring in full good faith its obligations and responsibilities toward the Eastern Band of Cherokee Indians under all United States laws, regulations, and policies. As part of those responsibilities, I am writing to invite the Eastern Band of Cherokee Indians to participate in developing a programmatic agreement for the Blue Ridge Parkway's proposed Roanoke Valley Greenway Trail project.

Blue Ridge Parkway is seeking the participation of your Nation, the Tuscarora Nation, Eastern Shawnee Tribe of Oklahoma, Absentee-Shawnee Tribe of Oklahoma, Catawba Indian Nation, United Keetoowah Band of Cherokee Indians, and the Shawnee Tribe. The Virginia State Historic Preservation Office and the Advisory Council of Historic Preservation are also being asked to participate.

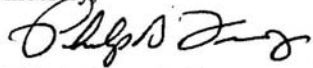
The Parkway proposes development of a multi-use trail network, linking the Parkway and the Roanoke Valley Greenway trail network. The project would include establishing and continuing to maintain approximately 30 miles of pedestrian and horse trails, authorizing several greenway connections which would accommodate pedestrians and provide bicycle access to the Parkway motor road, and authorizing mountain-bike use adjacent to the Roanoke River Parkway. The Roanoke Valley trail system is located between Mileposts (MP) 110.6 and 126.2, Section 1-M, in Roanoke County, Virginia.

The park intends to prepare a Programmatic Agreement (PA) to address potential effects on cultural resources, primarily archeological components, of the proposed project. Preparation of a PA is necessary since effects on historic properties cannot be fully determined before the project is initiated. In addition, the process and documentation



required for the preparation of an Environmental Assessment as required by the National Environmental Protection Act will be used to comply with the requirements of §106 of the National Historic Preservation Act. I have attached a draft scoping letter for the Environmental Assessment. If the Eastern Band of Cherokee Indians wishes to participate in development of the PA, please write to me or contact Cultural Resource Specialist Steven Kidd at 828-271-4779 x264, or [steven\\_kidd@nps.gov](mailto:steven_kidd@nps.gov).

Sincerely,



Philip A. Francis, Jr.  
Superintendent

cc: Russell Townsend, Tribal Historic Preservation Officer



IN REPLY REFER TO

## United States Department of the Interior

National Park Service  
Blue Ridge Parkway  
199 Hemphill Knob Road  
Asheville, North Carolina 28803



H4217

June 3, 2010

Chief Glenna J. Wallace  
Eastern Shawnee Tribe of Oklahoma  
127 W. Oneida Street  
Seneca, MO 64865

Dear Chief Wallace:

Federal regulations for the implementation of Section 106 of the National Historic Preservation Act of 1966, as amended, require consultation with federally recognized American Indian tribes (36 CFR 800.2) on a government-to-government basis. The administration of the Blue Ridge Parkway is committed to honoring in full good faith its obligations and responsibilities toward the Eastern Shawnee Tribe of Oklahoma under all United States laws, regulations, and policies. As part of those responsibilities, I am writing to invite the Eastern Shawnee Tribe of Oklahoma to participate in developing a programmatic agreement for the Blue Ridge Parkway's proposed Roanoke Valley Greenway Trail project.

Blue Ridge Parkway is seeking the participation of your Nation, the Tuscarora Nation, Absentee Shawnee Tribe of Oklahoma, Catawba Indian Nation, the United Keetoowah Band of Cherokee Indians, Cherokee Nation, Eastern Band of Cherokee Indians, and the Shawnee Tribe. The Virginia State Historic Preservation Office and the Advisory Council of Historic Preservation are also being asked to participate.

The Parkway proposes development of a multi-use trail network, linking the Parkway and the Roanoke Valley Greenway trail network. The project would include establishing and continuing to maintain approximately 30 miles of pedestrian and horse trails, authorizing several greenway connections which would accommodate pedestrians and provide bicycle access to the Parkway motor road, and authorizing mountain-bike use adjacent to the Roanoke River Parkway. The Roanoke Valley trail system is located between Mileposts (MP) 110.6 and 126.2, Section 1-M, in Roanoke County, Virginia.

The park intends to prepare a Programmatic Agreement (PA) to address potential effects on cultural resources, primarily archeological components, of the proposed project. Preparation of a PA is necessary since effects on historic properties cannot be fully determined before the project is initiated. In addition, the process and documentation required for the preparation of an Environmental Assessment as required by the National Environmental Protection Act will be used to comply with the requirements of §106 of



the National Historic Preservation Act. I have attached a draft scoping letter for the Environmental Assessment. If the Eastern Shawnee Tribe of Oklahoma wishes to participate in development of the PA, please write to me or contact Cultural Resource Specialist Steven Kidd at 828-271-4779 x264, or [steven\\_kidd@nps.gov](mailto:steven_kidd@nps.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Philip A. Francis, Jr.", written in a cursive style.

Philip A. Francis, Jr.  
Superintendent

cc: Robin Dushane





IN REPLY REFER TO

## United States Department of the Interior

National Park Service  
Blue Ridge Parkway  
199 Hemphill Knob Road  
Asheville, North Carolina 28803



H4217

June 3, 2010

Chief George G. Wickliffe  
United Keetoowah Band of Cherokee Indians  
2450 South Muskogee  
Tahlequah, OK 74464

Dear Chief Wickliffe:

Federal regulations for the implementation of Section 106 of the National Historic Preservation Act of 1966, as amended, require consultation with federally recognized American Indian tribes (36 CFR 800.2) on a government-to-government basis. The administration of the Blue Ridge Parkway is committed to honoring in full good faith its obligations and responsibilities toward the United Keetoowah Band of Cherokee Indians under all United States laws, regulations, and policies. As part of those responsibilities, I am writing to invite the United Keetoowah Band of Cherokee Indians to participate in developing a programmatic agreement for the Blue Ridge Parkway's proposed Roanoke Valley Greenway Trail project.

Blue Ridge Parkway is seeking the participation of your Nation, the Tuscarora Nation, Eastern Shawnee Tribe of Oklahoma, Absentee-Shawnee Tribe of Oklahoma, Catawba Indian Nation, Cherokee Nation, Eastern Band of Cherokee Indians, and the Shawnee Tribe. The Virginia State Historic Preservation Office and the Advisory Council of Historic Preservation are also being asked to participate.

The Parkway proposes development of a multi-use trail network, linking the Parkway and the Roanoke Valley Greenway trail network. The project would include establishing and continuing to maintain approximately 30 miles of pedestrian and horse trails, authorizing several greenway connections which would accommodate pedestrians and provide bicycle access to the Parkway motor road, and authorizing mountain-bike use adjacent to the Roanoke River Parkway. The Roanoke Valley trail system is located between Mileposts (MP) 110.6 and 126.2, Section 1-M, in Roanoke County, Virginia.

The park intends to prepare a Programmatic Agreement (PA) to address potential effects on cultural resources, primarily archeological components, of the proposed project. Preparation of a PA is necessary since effects on historic properties cannot be fully determined before the project is initiated. In addition, the process and documentation required for the preparation of an Environmental Assessment as required by the National



Environmental Protection Act will be used to comply with the requirements of §106 of the National Historic Preservation Act. I have attached a draft scoping letter for the Environmental Assessment. If the United Keetoowah Band of Cherokee Indians wishes to participate in development of the PA, please write to me or contact Cultural Resource Specialist Steven Kidd at 828-271-4779 x264, or [steven\\_kidd@nps.gov](mailto:steven_kidd@nps.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Philip A. Francis, Jr.", written in a cursive style.

Philip A. Francis, Jr.  
Superintendent

cc: NAGPRA Representative, Sequoyah Guess



IN REPLY REFER TO

H4217

June 3, 2010

Chairman Ron Sparkman  
Shawnee Tribe  
29 South Highway 69A  
Miami, OK 74354

Dear Chairman Sparkman:

Federal regulations for the implementation of Section 106 of the National Historic Preservation Act of 1966, as amended, require consultation with federally recognized American Indian tribes (36 CFR 800.2) on a government-to-government basis. The administration of the Blue Ridge Parkway is committed to honoring in full good faith its obligations and responsibilities toward the Shawnee Tribe under all United States laws, regulations, and policies. As part of those responsibilities, I am writing to invite the Shawnee Tribe to participate in developing a programmatic agreement for the Blue Ridge Parkway's proposed Roanoke Valley Greenway Trail project.

Blue Ridge Parkway is seeking the participation of your Nation, the Tuscarora Nation, Eastern Shawnee Tribe of Oklahoma, Absentee-Shawnee Tribe of Oklahoma, Catawba Indian Nation, United Keetoowah Band of Cherokee Indians, and the Eastern Band of Cherokee Indians. The Virginia State Historic Preservation Office (SHPO) and the Advisory Council of Historic Preservation are also being asked to participate.

The Parkway proposes development of a multi-use trail network, linking the Parkway and the Roanoke Valley Greenway trail network. The project would include establishing and continuing to maintain approximately 30 miles of pedestrian and horse trails, authorizing several greenway connections which would accommodate pedestrians and provide bicycle access to the Parkway motor road, and authorizing mountain-bike use adjacent to the Roanoke River Parkway. The Roanoke Valley trail system is located between Mileposts (MP) 110.6 and 126.2, Section 1-M, in Roanoke County, Virginia.

The park intends to prepare a Programmatic Agreement (PA) to address potential effects on cultural resources, primarily archeological components, of the proposed project. Preparation of a PA is necessary since effects on historic properties cannot be fully determined before the project is initiated. In addition, the process and documentation required for the preparation of an Environmental Assessment as required by the National Environmental Protection Act will be used to comply with the requirements of §106 of the



National Historic Preservation Act. I have attached a draft scoping letter for the Environmental Assessment. If the Shawnee Tribe wishes to participate in development of the PA, please write to me or contact Cultural Resource Specialist Steven Kidd at 828-271-4779 x264, or [steven\\_kidd@nps.gov](mailto:steven_kidd@nps.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Philip A. Francis, Jr.", written in a cursive style.

Philip A. Francis, Jr.  
Superintendent

cc: Kim Jumper





IN REPLY REFER TO

## United States Department of the Interior

National Park Service  
Blue Ridge Parkway  
199 Hemphill Knob Road  
Asheville, North Carolina 28803



H4217

June 3, 2010

Chief Leo R. Henry  
Tuscarora Nation  
2006 Mount Hope Road  
Lewistown, NY 14092

Dear Chief Henry:

Federal regulations for the implementation of Section 106 of the National Historic Preservation Act of 1966, as amended, require consultation with federally recognized American Indian tribes (36 CFR 800.2) on a government-to-government basis. The administration of the Blue Ridge Parkway is committed to honoring in full good faith its obligations and responsibilities toward the Tuscarora Nation under all United States laws, regulations, and policies. As part of those responsibilities, I am writing to invite the Tuscarora Nation to participate in developing a programmatic agreement for the Blue Ridge Parkway's proposed Roanoke Valley Greenway Trail project.

Blue Ridge Parkway is seeking the participation of your Nation, as well as the Eastern Shawnee Tribe of Oklahoma, Absentee Shawnee Tribe of Oklahoma, Catawba Indian Nation, United Keetoowah Band of Cherokee Indians, Cherokee Nation, Eastern Band of Cherokee Indians, and the Shawnee Tribe. The Virginia State Historic Preservation Office and the Advisory Council of Historic Preservation are also being asked to participate.

The Parkway proposes development of a multi-use trail network, linking the Parkway and the Roanoke Valley Greenway trail network. The project would include establishing and continuing to maintain approximately 30 miles of pedestrian and horse trails, authorizing several greenway connections which would accommodate pedestrians and provide bicycle access to the Parkway motor road, and authorizing mountain-bike use adjacent to the Roanoke River Parkway. The Roanoke Valley trail system is located between Mileposts (MP) 110.6 and 126.2, Section 1-M, in Roanoke County, Virginia.

The park intends to prepare a Programmatic Agreement (PA) to address potential effects on cultural resources, primarily archeological components, of the proposed project. Preparation of a PA is necessary since effects on historic properties cannot be fully determined before the project is initiated. In addition, the process and documentation required for the preparation of an Environmental Assessment as required by the National Environmental Protection Act will be used to comply with the requirements of §106 of



the National Historic Preservation Act. I have attached a draft scoping letter for the Environmental Assessment. If the Tuscarora Nation wishes to participate in development of the PA, please write to me or contact Cultural Resource Specialist Steven Kidd at 828-271-4779 x264, or [steven\\_kidd@nps.gov](mailto:steven_kidd@nps.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Philip A. Francis, Jr.", written in a cursive style.

Philip A. Francis, Jr.  
Superintendent

cc: Tuscarora THPO

Figure A-10. ACHP Consultation Letter

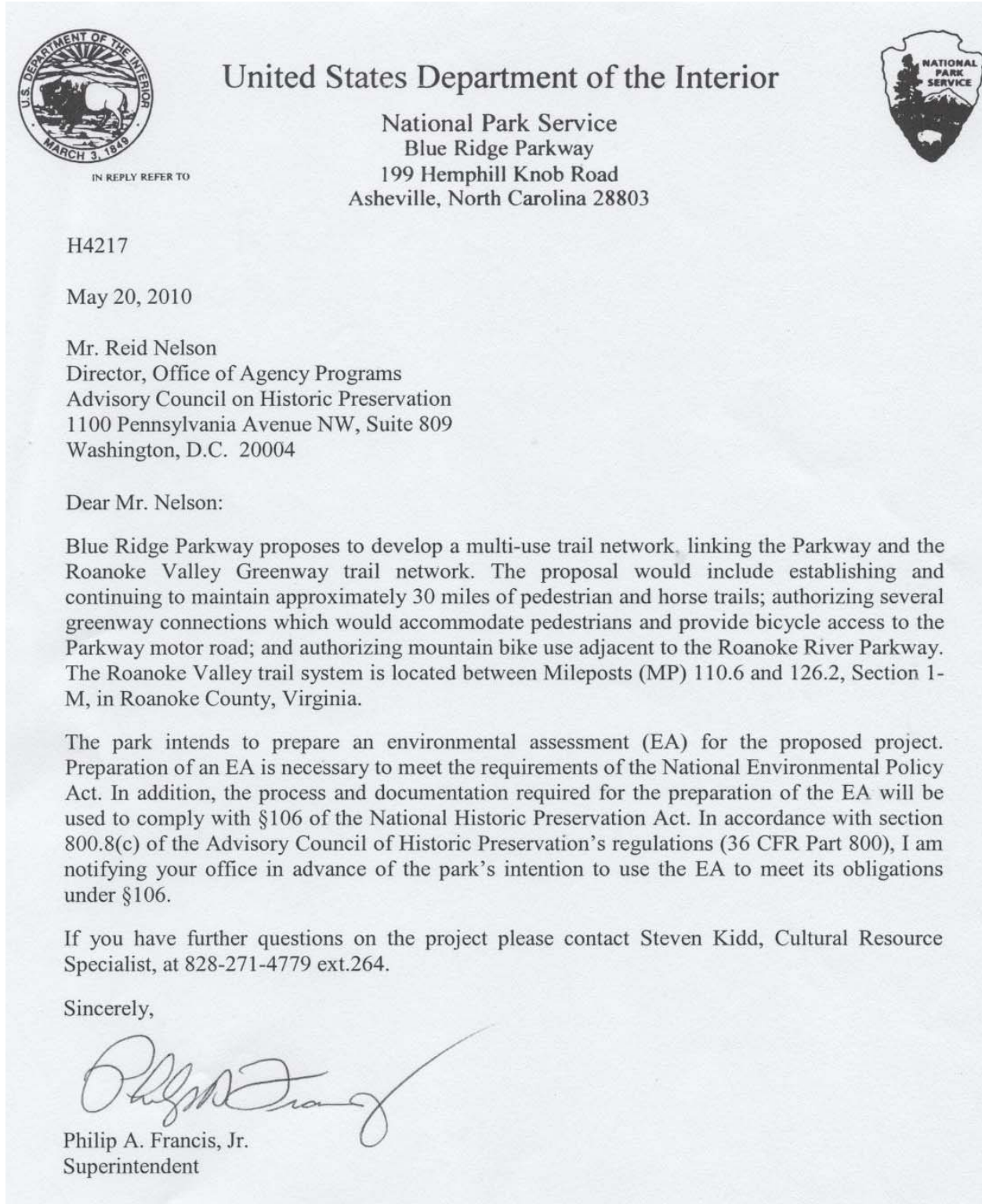


Table A-1. Persons Who Received the Scoping Letter		
Ms. Cathryn Gilliam National Parks Conservation Association Post Office Box 1003 Staunton, Virginia 24402	Mr. Erik Davis USFWS, Ecological Services Virginia Field Office 6669 Short Lane Gloucester, Virginia 23061	U.S. Army Corps of Engineers Norfolk District Office 803 Front Street Norfolk, Virginia 23510-1096
Honorable Bob Goodlatte 10 Franklin Road, SE Suite 540 Roanoke, Virginia 24011	Ms. Susan Mills Executive Director Friends of the Blue Ridge Parkway Salem, Virginia 24153	Ms. Ellie Irons, Program Manager VADEQ Office of Environmental Impact Review 629 East Main Street Richmond, Virginia 23219
S. Rene Hypes Project Review Coordinator VA DCR Natural Heritage Program 217 Governor St., Suite 312 Richmond, Virginia 23219-2094	Brian Moyer VA DGIF Environmental Services Section 4010 West Broad Street Richmond, Virginia 23230	Bud LaRoche VA DGIF 4010 West Broad Street Richmond, Virginia 23230
Elleanore Daub Environmental Program Planner VA DEQ PO Box 1105 Richmond, Virginia 23218	Keith R. Tignor Endangered Species Coordinator VA DACS Office of Plant and Pest Service 2943 Peters Creek Rd, Suite E Roanoke, Virginia 24019	Jeff Madden VA Marine Resources Commission Habitat Management Division 2600 Washington Avenue Newport News, Virginia 23607-0756
Kathleen Kilpatrick State Historic Preservation Officer VA DHR 2801 Kensington Avenue Richmond, Virginia 23221	Dr. Houck Medford Executive Director Blue Ridge Parkway Foundation PO Box 10427 - Salem Station Winston-Salem, North Carolina 27108	Mr. Mark McClain Sierra Club 907 Greenbrier Ct Salem, Virginia 24153



**Table A-2. Public Scoping Content Analysis Report**

**Comment Distribution by Code**

(Note: Each comment may have multiple codes. As a result, the total number of comments may be different than the actual comment totals)

Code	Description	Number of Comments
AA001	Alt A: In favor of Alternative A	8
AA002	Alt B: In favor of Alternative B	31
AA003	Alt C: In favor of Alternative C	111
AA0031	Alt C: Opposed to Alternative C	17
AA010	Alt A: Opposed to Alternative A	2
AE19000	Affected Environment: Other Agencies' Land Use Plans	28
AE22001	Affected Environment: Current trail conditions	12
AL001	In favor of multi-use trail	23
AL002	Against multi-use trail	8
AL003	In favor of access routes and/or social trails.	37
AL004	Opposed to access routes and/or social trails, i.e., agree with closures.	2
AL4000	Alternatives: New Alternatives Or Elements	25
BI001	Bikes on trail: In favor of bicycles on trails	49
BI002	Bikes on trail: opposed to bicycles on trails	50
CC1000	Consultation and Coordination: General Comments	48
CC1001	Consultation and Coordination: Requirements	1
ER0001	Impacts: Erosion to trails	9
HI0001	Highway crossings: In favor of working to VDOT to improve crossings	2
HO001	Horses on trails: in favor of horses on trails	38
IP100	ISSUES - Park management issues	16
MT1000	Miscellaneous Topics: General Comments	92
ON1000	Other NEPA Issues: General Comments	1
PA001	Parking: In favor of additional parking	13
PO4000	Park Operations: Impact Of Proposal And Alternatives	20
RR00001	Roanoke River Pkwy: In favor of connection from RRP to Explore Park	1
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	16
SI001	Signage and education: use of trail signs, trail mapping, brochures, trail user education, etc.	12
UP1000	Short Term/Long Term Use and Productivity: General Comments	9
VE4000	Visitor Experience: Impact Of Proposal And Alternatives	18
VO001	Volunteers: use of volunteers on trails	37
VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives	44

**Comment Distribution by Status**

Status	Number of Comments
Coded	364
<b>Total</b>	<b>364</b>

**Correspondence Distribution by Correspondence Type**

Type	Number of Correspondences
Web Form	107
Other	12
Letter	5
E-mail	6
<b>Total</b>	<b>130</b>

**Correspondence Signature Count by Organization Type**

Organization Type	Number of Correspondences
Town or City Government	1
County Government	6
Business	1
Recreational Groups	24
State Government	1
Non-Governmental	1
Unaffiliated Individual	96
<b>Total</b>	<b>130</b>

**Correspondence Distribution by State**

State	Percentage	Number of Correspondences
WV	0.77%	1
VA	90.77%	118
MD	0.77%	1
TN	1.54%	2
NH	0.77%	1
FL	0.77%	1
NC	1.54%	2
<b>Total</b>		<b>130</b>