

FINDING OF NO SIGNIFICANT IMPACT
FOR THE
REHABILITATION OF EAST STATE PARK ROAD
AND MISCELLANEOUS IMPROVMENTS
ENVIRONMENTAL ASSESSMENT

CUYAHOGA VALLEY NATIONAL PARK

ERRATA

The combination of the EA and this errata form the complete and final record on which the FONSI is based. Additionally, the Park's responses to substantive comments on the EA are included. The "Responses to Comments" section addresses those comments that warranted clarification or explanation.

ERRATA

Page 6, First Paragraph: Dover Lake Waterpark should not be listed as one of the Park's areas of significance. It was demolished last year.

RESPONSE TO COMMENTS

1) Comments from Mr. Peter A. Panizzutti:

I recently became aware that the NPS has plans for Fitzwater Road that include renovating or replacing the Fitzwater Truss Bridge. Rather than renovating the bridge, in order to make it structurally sound for motor vehicle traffic, and spending considerable sums of money in the process, I have a better idea.

The NPS currently has on the drawing board another project in the CVNP: the proposed Hemlock Trail that will connect the center of Independence to the Towpath Trail via a pedestrian bridge over the Cuyahoga River at Stone Road. Why not move the Fitzwater Truss Bridge to Stone Road and use it as the pedestrian bridge over the river. The bridge abutments from the former Stone Road Bridge are still in place. Certainly, minimal work would have to be done on the Fitzwater Truss Bridge if it only needed to structurally support pedestrians and bicyclists. After all, pedestrians use that bridge everyday currently.

This solution would seem to be the most practical and make the most economic sense. As a pedestrian bridge, the beauty of the Fitzwater Truss Bridge in its new location could be appreciated by all who use the tow path (as is the truss bridge at Station Road). At the same time, a new Fitzwater Bridge spanning the Cuyahoga River could be designed and built from the ground up to meet the vehicular needs of the CVNP for the Twentieth-First Century.

Park response to Mr. Panizzutti:

Thank you for your comment. The Park will consider the reuse of the Fitzwater Truss structure at Stone Road.

2) Comments from Mr. Gene A. Wimmer:

I believe that the Cuyahoga Valley National Park has a once-in-a-lifetime opportunity to make substantial improvements if it chooses not to replace the Fitzwater Road bridge as concluded in Alternative D Option 1 of the Environmental Assessment. I believe that a better alternative would be an alignment along the rail line, mentioned on page 7, referring to a January 2008 study, but not discussed further that I could find. My understanding is that this alignment would follow the rail line north from the railroad maintenance yard to the new sewer access road and then to Pleasant Valley Road. I believe that this alternative would allow for a number of advantages.

Imagine bicycling the towpath and having to contend with one less at-grade intersection with vehicular traffic. The rail alignment would mean that traffic to the railroad maintenance yard would not need to cross the towpath. Alternative D-1 proposes to actually increase conflicting traffic by adding visitor parking with access crossing the towpath. Hopefully, Fitzwater Road traffic would be signed to stop or yield to towpath traffic. Alternatively, the rail alignment would be much safer, allowing all vehicular traffic to enter the area via Pleasant Valley Road and away from towpath traffic. A visitor parking lot could be built anywhere along this alignment, and a connector trail to the towpath could be built using the old Fitzwater Road and bridge (with repair?). If a new bridge over the Cuyahoga River is required, then one smaller, "pedestrian" bridge would be less invasive and less expensive than the two bridges proposed in Alternative D-1.

Imagine canoeing or kayaking the Cuyahoga and having to contend with one less man-made distraction as you flow downstream. If the Fitzwater bridge (and its increased traffic per Alternative D-1) were to be eliminated, I believe visitors' experience in this section of the park would be enhanced. In addition, eliminating the bridge would improve streamflow characteristics by also removing the unnatural restriction referred to in the EA. I believe CVNP should do more to return the park to its natural state, and should be a leader in promoting minimal and smarter development, if development is necessary at all. If additional parking is necessary, I do not believe that it should interfere with the enjoyment and safety of trail use. Also, the lot and access road should be paved in pervious material. But, my belief is that additional parking is not necessary. Large, under-utilized parking lots already exist 1.2 miles to the north (a 5-10 minute bicycle ride) and 2+ miles to the south (a 10-15 minute bicycle ride). The nearby Frazee trailhead parking is also available, although improvements could be made to make it safer and larger, if absolutely necessary. Few visitors come from the immediate area. And most visitors have easier and safer access at Station Road (from the south), Canal Visitor Center (from the north), and Pleasant Valley Road (from the east or west).

Imagine hiking the towpath and having the chance to view and encounter more wildlife,

rather than less. Wildlife was a topic dismissed from discussion in the EA. CVNP will never be a wilderness area, but I believe that the park should take this opportunity to eliminate this sole-purpose road from the area, and certainly should not develop the road to introduce more traffic into the interior of the park. Other parks have recognized the impact of roads and traffic on wildlife movement and have actually done things to mitigate the man-made barriers for animal movement. An alignment along the railroad would not further deter the traffic of wildlife in the area, but would instead enlarge the area for road-free wildlife movement.

Imagine the next time that the Cuyahoga River threatens to overflow its banks and the CVNP rangers have one less parking lot to clear and insure that all visitors and their cars are safely out of the area before it floods. I believe that the CVNP should be a leader in not encouraging new development in floodplains. The CVNP has moved trails out of floodplains and encourages bordering communities to understand their part in dealing with flooding issues. Here is a chance to practice what the past has taught us, and eliminate another future safety issue for the rangers and repair headache for the maintenance crews.

Imagine the engineers and the maintenance crews of the CVNP not being further burdened by more structures to design and maintain. Building two new bridges and a parking lot and an enhanced road adds to the workload of an already overworked staff. An alignment along the railroad would eliminate the need for the two new bridges (and the associated maintenance) in perpetuity. And, as I have already discussed, the need for another parking lot is questionable. Maintenance time and spending could be better utilized on already existing assets of the CVNP.

Imagine the taxpayers being asked to fund a reasonable approach to solving an existing problem, rather than spending tax monies on what must be one of the most expensive solutions. I believe that an alignment along the rail line would have a significantly lower life-cycle cost than the \$3,645,000 referred to in the EA for Alternative D Option 1. And I believe that the alternative alignment would offer more benefits and fewer detriments, as I hope that I have pointed out in the above arguments for the alternative option. More for less can be a wonderful option.

In summary, I hope that the Cuyahoga Valley National Park can be made a better park in many respects and from many points of view if it chooses an alignment along the rail line over Alternative D Option 1.

Park response to Mr. Wimmer:

The purpose of the project is to provide access to the National Historic Landmark (NHL), the Cuyahoga Valley Scenic Railroad (CVSR) maintenance yard, and the Towpath Trail. The alignment proposed for the access road was identified only as an option to provide access to the maintenance yard, and was analyzed as part of all of the Action Alternatives. The proposed access road is a one lane gravel road with pulloffs, open only to CVSR and Park staff.

The access road could not be constructed to provide access to the NHL, the CVSR maintenance yard, and the Towpath trail without adverse impacts of a much greater scale than the alternatives carried forward in the EA. The proposed access road is one lane. A two lane road constructed to current design standards would impact the large wetland complex in the floodplain. A one lane roadway is able to skirt the edge of the fill placed to construct the rail line. This wetland area has already been partially restored, and has been targeted for future restoration in the Park's Degraded Wetlands Restoration Plan. Permanent impacts to the large wetland complex in this area would be unacceptable to the Park.

The construction of a public roadway adjacent to an active rail line is not preferable. It creates a potential for safety concerns. Public use of the roadway through the maintenance yard is also not preferable, as it creates additional risk for the CVSR due to vandalism of their facilities and equipment. Utility lines run adjacent to the existing rail line, and would run under the proposed access road. The construction of a permanent paved roadway would require the movement of these buried utilities.

The existing sewer access road meets Pleasant Valley Road at less than 45 degree angle. The optimum angle to ensure the adequate sight distance of drivers is a 90 degree angle. Drivers would experience poor sight distance when turning east onto Pleasant Valley Road. Drivers turning from Pleasant Valley Road heading east would have to cross the westbound lane. During rush hour times, this could create a back up of vehicles waiting behind a turning vehicle. This may create additional traffic conflicts and safety concerns, and may eventually require the construction of a turn lane.

The construction of a permanent roadway along the rail line and sewer access road would still require the use of Fitzwater Road or a newly construction connection to the Towpath trail in order to maintain access to the Towpath Trail. As stated in the comment, a pedestrian bridge would still be necessary to cross the Cuyahoga River. Due to the width of the river crossing, a substantial sized structure would still be necessary, and would have similar costs. Park visitors and trail users would be unable to access the NHL, which includes Lock 37 and Alexander's Mill without the construction of a second pedestrian bridge.

The trailhead and parking area was originally called for in the CVNRA Trail Plan of 1985. The location of the trailhead and parking area was changed and downsized to minimize the placement of fill material in the floodplain. The need for additional parking in this area is clearly exhibited today by the number of people who currently park along the Canal Road shoulder to access the Towpath Trail.

The alternative proposed under this comment would not meet the purpose and need of the project without the construction of bridges across the Cuyahoga River, Ohio & Erie Canal, and the Waste Weir. This action would also cause adverse impacts to wetlands (and wildlife habitat) and safety. The preferred alternative would be constructed to

minimize impacts to the extent possible while providing access to historic and recreational areas for visitors to enjoy. Stormwater from the additional impervious area would be treated in accordance with state regulations, and pavement from the abandoned portion of Fitzwater Road would be obliterated and re-vegetated.