

**Errata and Response to Comments
Cuyahoga Valley National Park
Boston Mills Historic District Sanitary Sewer Collection and Treatment System**

These errata should be attached to the Boston Mills Historic District Sanitary Sewer and Treatment System Environmental Assessment (EA) dated January 2010. They are intended to correct or clarify statements in the EA other than typographical and minor editorial errors and to address substantive comments on these documents received during the public review period. These errata and responses to comments together with the Finding of No Significant Impact (FONSI) and the EA describe the final decision of the National Park Service for Boston Mills Historic District Sanitary Sewer Collection and Treatment System.

Plan Errata

In Section 2.2.12- Threatened, Endangered, or Rare Wildlife Species, it was incorrectly stated that in correspondence dated August 20, 2009, the USFWS recommended that if suitable habitat was found within the project area, trees could only be cut between September 30 and April 1. That statement has been removed and replaced with the following: “It was recommended that the habitat and surrounding trees be saved wherever possible. If tree removal becomes necessary, further coordination with USFWS will be required to evaluate potential impacts to Indiana bats and their habitats.” Additionally, the following statement has been added to the section: “The NPS has made a determination of no effect on federally-listed species or critical habitat under the Endangered Species Act of 1973, as amended.”

In Section 3.3 the discussion of Alternative 2- Subsurface Drip Irrigation Treatment System it is stated that the Ohio Environmental Protection Agency (Ohio EPA) would require monitoring of total suspended solids, carbonaceous biological oxygen demand, and fecal coliform three times per week based on draft rules. According to the Ohio EPA, the new regulations for drip irrigation systems do not specify monitoring requirements but they would most likely be on a quarterly basis.

Section 3.5.2 under Alternative Considered But Rejected, states that a package plant is not a viable alternative since the Cuyahoga River is not in attainment of applicable water standards in this reach and therefore the necessary discharge permit could not be obtained. Per the Ohio EPA, additional sampling of the Cuyahoga River was conducted in 2008 and has determined that this reach of river is in partial attainment. This does not change the conclusion that the alternative was rejected since detailed engineering design and analysis would be required prior the Ohio EPA considering a request for a permit. Once the permit was applied for the Ohio EPA would consider it but will not assure its eventual issuance.

Responses to Comments

The NPS received seven comments on the EA, five from private citizens, one from the U.S. Fish and Wildlife Service and one from a commercial manufacturer of products for the action alternative that was not selected. Two comments were about providing utility services to private property owners, however, the scope of the project is limited to NPS owned properties therefore these comments will not be addressed. One commenter provided numerous comments on the

specifics of the constructed wetlands engineering but not the concept. Engineering details will be addressed during the design of the Selected Alternative. Therefore, these comments will not be addressed further in this document. Two comments address the cost of the project which was not included in the EA since the environmental resources are the primary determinants in evaluating the alternatives. Additional comments and responses are as follows.

Comment: Some of the "major" or more popular trails have foul and possibly dangerously deficient drainage and or transmission lines. These are poorly maintained and need upgraded as well as the sewer lines for the dwellings in the valley.

Response: The scope of the project is limited to the wastewater generated in and around the Boston Mills Historic District.

Comment: My family utilizes the trails all over the valley and metro parks. We really believe that the project addressed in the disclosure needs to be reconsidered and expanded to include all public waste water systems in the park system.

Response: The National Park Service is not a public utility provider and therefore cannot address public wastewater systems with this project.

Comment: Root intrusion in Subsurface Drip Irrigation Systems (SSDI) is not necessarily an issue of concern as it seems to have been presented. These systems provide the opportunity for supplemental irrigation as well as other environmental benefits. Lastly, SSDI systems have been used in freezing climates year-round therefore winter storage/hauling should not be a limitation.

Response: The commenter provided input on several aspects of the alternative for the NPS to consider, however, another alternative was still selected due to the following reasons. The EA states that root intrusion is typically not a problem during the first 10-years of operation whereas the Selected Alternative does not have any problems with vegetation control for the life of the system. Utilizing the drip field for supplemental irrigation in this case is not considered a benefit since the proposed location is an existing open meadow which has been identified to remain as open meadow and not to be used for agricultural or other development purposes. The analysis of winter storage requirements is based on the most current requirements by the Ohio EPA which does require storage during winter months.

Comment: Statement that operation of wetland cells would have to wait on plant development is incorrect as a grass or gravel system would be one third effective which would be sufficient as plans call for a 'hook up as needed' for the buildings.

Response: While individual buildings could be tied into the proposed system as needed, the intent is to tie in all buildings at the same time. This will be addressed during the detailed design phase of the project.