

## Appendix A: Summary of Scoping and Public Participation

### A. Formal Public Participation Activities.

The following scoping activities related to the Trail Management Plan and EIS have occurred.

September, 2009	<b>Environmental Impact Statement process begins.</b> NPS initiates Environmental Impact Statement (EIS) through Notice of Intent in Federal Register.
September, 2009	<b>Stakeholder Letters.</b> Scoping letters with requesting input on issues and ideas for the EIS are mailed to approximately 60 agencies, governmental entities and organizations.
January, 2010	<b>Newsletter 1</b> is distributed to stakeholders, media and interested individuals. Provides information on public scoping process and scheduled workshops.
February, 2010	<b>Public Scoping Meetings.</b> Three meetings in an Open House format were held at the Happy Days Lodge, Peninsula, Ohio. The Open House format provided a brief presentation on the planning process and invited to the public to provide ideas at Topic Stations in the meeting facility. Press coverage included an article in the Akron Beacon Journal and Cleveland Plain Dealer. Approximately 150 people attended the meetings. Ideas were also accepted through Plan's PEPC website and in letter format.
April, 2010	<b>Newsletter 2</b> is distributed to stakeholders, media and interested individuals. An email list is assembled from public scoping participants and interested parties for distribution. The newsletter provides a summary of the issues and ideas generated during the public scoping meetings.
September, 2010	<b>Trail Management Plan Workbook.</b> An interim Workbook introducing initial conceptual Alternatives based upon public scoping input. Workbook is provided to general public through the PEPC project website and printed copies. Press release and distribution of notice of availability for public comment occurred.
September, 2010	<b>Conceptual Alternatives Public Meetings.</b> Three public meetings were conducted at Happy Days Lodge to invite the public to learn about the Conceptual Alternatives developed. Approximately 122 people attended the meetings. Comments were received by written correspondence or through the PEPC project website.
January, 2011	<b>Public Scoping Period Closed.</b> Public input was accepted until January, 2011.
May, 2011	<b>Newsletter 3</b> is distributed to stakeholders, media and interested individuals by mail, direct email distribution and available on the project's PEPC website. Information is provided on input received during public scoping and review of Conceptual Alternatives.
October, 2011	<b>Newsletter 4</b> is distributed to stakeholders, media and interested individuals by mail, direct email distribution and available on the project's PEPC website. The newsletter provided an update on the status of the Planning process and updated schedule for Draft Plan.

June, 2012

**DEIS Notice of Availability.** The U.S. EPA Notice of Availability of the Draft EIS is published for the 60-day public review and comment period.

July, 2012

**DEIS Public Meetings.** Three public meetings are conducted to present the Draft EIS to the public, answer questions to clarify content of the plan, and for the public to submit written comments.

## **B. Groups Contacted During Public Scoping Activities**

Akron Metroparks Hiking Club  
Akron Metropolitan Area Transportation Study  
American Whitewater  
Appalachian Outfitters  
Army Corps of Engineers  
Bath Township  
Blossom Music Center  
Boston Mills/Brandywine Ski Resorts  
Boston Township  
Botzum Farm  
Blimp City Bikes  
Buckeye Trail Association  
Camp Manatoc, Boy Scouts of America  
Carriage Trade Farm  
Century Cycles  
City of Akron  
City of Bedford  
City of Brecksville  
City of Cleveland  
City of Cuyahoga Falls  
City of Fairlawn  
City of Hudson  
City of Independence  
City of Valley View  
Cleveland Area Mountain Bike Association  
Cleveland Audubon  
Cleveland Hiking Club  
Cleveland Metroparks  
Cleveland Museum of Natural History  
Cleveland Sight Center  
Conservancy for Cuyahoga Valley National Park  
Cornell University  
County of Cuyahoga  
County of Summit  
Crown Point Ecology Center  
Cuyahoga River RAP (CRCPO)  
Cuyahoga Soil & Water Conservation District  
Cuyahoga Valley Communities Council  
Cuyahoga Valley Countryside Conservancy

Cuyahoga Valley Trails Council  
Cuyahoga Valley Adopt-A-Trail  
Delaware Tribe of Western Oklahoma  
Eastern Shawnee Tribe of Oklahoma  
Echo Hills Neighborhood Association  
Friends of Crooked River  
Girl Scouts of Northeast Ohio  
(Camp Ledgeswood)  
Green City Blue Lake Institute  
Greenwood Village Community Association  
Greater Akron Audubon Society  
Inn at Brandywine Falls  
International Mountain Bike Association  
Keelhaulers Canoe Club  
Kent State University  
Metro Parks, Serving Summit County  
Miami Tribe of Oklahoma  
National Parks Conservation Association  
NPS- Water Resources Division  
Northeast Ohio Areawide Coordinating Agency  
Northeast Ohio Hiking Club  
Northfield Center Township  
Ohio and Erie Canal Corridor Coalition  
Ohio and Erie Canalway Coalition  
Ohio Canal Corridor  
Ohio Department of Agriculture  
Ohio Department of Natural Resources  
Ohio EPA  
Ohio Historical Society  
Ohio Horseman's Council, Cuyahoga, Medina  
and Summit Chapters  
Old Trail School  
Ottawa Tribe of Oklahoma  
Phyllis Wheatley Association  
Public Employees for Environmental  
Responsibility  
Rails to Trails Conservancy  
Richfield Township  
Sagamore Hills Township

Second Sole  
Seneca Nation  
Seneca –Cayuga Tribe of Oklahoma  
Sierra Club – Portage Trail Group  
Shawnee Tribe of Oklahoma  
Spicy Lamb Farm  
Summit Athletic Running Club  
Summit Soil & Water Conservation Group  
The Nature Conservancy  
Tri-County Independent Living  
U.S. EPA  
U.S. Fish and Wildlife Service  
United Disability Services  
U.S. Senator Portman  
U.S. Senator Brown  
U.S. Representative Marcia Fudge  
U.S. Representative Dennis Kucinich  
U.S. Representative Steve LaTourette  
U.S. Representative Jim Renacci  
U.S. Representative Tim Ryan  
U.S. Representative Betty Sutton  
Vertical Runner  
Village of Boston Heights  
Village of Peninsula  
Village of Richfield  
Village of Walton Hills  
West Creek Preservation Committee  
Western Cuyahoga Audubon Society  
Western Reserve Land Conservancy  
Western Reserve Historical Society  
Western Reserve Resource Conservation and  
Development

## **Appendix B. Resource Issues Identified During Public Scoping**

### **Resource Issues**

Erosion and drainage problems are recurring issues on some trails.  
Current trails bisect seasonal or recurring sensitive habitat areas.  
Consider trail design standards that minimize resource impacts.  
Invasive plant proliferation on disturbed sites exist in the Park.  
Existing trails are located in floodplains and wetland areas.

### **Visitor Use Issues**

User conflicts between user types and level of experience are a recurring issue on particular trails.  
New uses, including designated mountain bike trails and water trails are suggested.  
Trail connections within and outside of park are limited both off road and on-road.  
Accessibility and degrees of trail user experience level do not meet wide variety of current trail users.  
Non-designated social trails are being used by visitors and unauthorized recreation users in the Park.  
Develop policies and trail designs for multi-use on existing or new trails.  
Trail user etiquette and multi-use education has diminished and needs to be enhanced.  
Disperse trail use to less congested trails.  
Existing trails loops are limited in distance.  
Existing trails are limited in standards of difficulty.  
Some trails in the 1985 Trail Plan have not been implemented.

### **Facilities Use Issues**

Parking in high use areas is inadequate.  
Larger horse trailer parking needs are unmet in high use areas.  
Trail support uses including camping, picnic areas and horse posts, are desired.  
Signage and visitor information could be enhanced to assist the trail user.  
Support facilities for water trail are desired such as portage paths, boat launches or canoe livery for river access and operation.  
Expanded trail head facilities for trail user needs.

### **Maintenance Issues**

Current NPS staffing and operating budget cannot fulfill existing trail maintenance.  
Trail and trail support facilities infrastructure continues to age.  
Bridge infrastructure on some park trails is deteriorating.

### **Administrative Issues**

Trail information to visitors is not adequate.  
Utilize and expand existing trail stewardship partners.  
Utilize new technology to inform trail users and provide interaction of trail conditions.  
Expand the opportunities for trail network to enhance economic vitality of the region and local communities.  
Current trail improvement projects are backlogged for funding.  
Annual and recurring maintenance is inhibited due to workload of park maintenance and park budget limitations.

## **Appendix C. Sustainable Trail Guidelines.**

**(Detached: Sustainable Trail Guidelines)**

## **Appendix D. Responses to Comments on the Draft Plan/EIS**

The NPS has compiled substantive comments and responses to those comments received during the public comment period for the Draft Trail Management Plan and EIS as outlined in section 5.1.3 of the Final Trail Plan and Environmental Impact Statement. If multiple comments were received that were commenting on similar topic issues in the Plan, the NPS established a concern statement to respond to those issues collectively. The comment and response section begins with any correspondence received from local, state or federal government agencies or jurisdictions, and follows with comments received from organizations and the general public. The comments and responses are organized by subject areas in the order they occur within the Plan's format.

## Correspondence from Agencies and Tribes



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

AUG 15 2012

REPLY TO THE ATTENTION OF:

E-19J

Lynn Garrity  
Cuyahoga Valley National Park  
15610 Vaughn Road  
Brecksville, Ohio 44141

**Re: Draft Environmental Impact Statement for the Trail Management Plan for Cuyahoga Valley National Park, Brecksville, Ohio – CEQ # 20120196**

Dear Ms. Garrity:

The United States Environmental Protection Agency has reviewed the above-referenced document provided by the National Park Service (NPS). Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

Cuyahoga Valley National Park (Park) is a 33,000-acre park between the metropolitan areas of Cleveland and Akron, Ohio. Over 3 million people reside within 25 miles of the park. As a designated urban gateway park, the Park provides visitors the opportunity to experience the cultural, scenic, natural, historical, and recreational resources of the Cuyahoga River Valley and the Ohio and Erie Canal Corridor.

NPS is proposing to update their Trail Management Plan (Plan) to guide the expansion, restoration, management, operations, and use of the Park's trail system and its associated amenities over the next 15 years. The current Plan is outdated. Trails are no longer in desired configuration. Goals and objectives used to develop the updated Trail Management Plan are:

- Goal 1: A trail network that provides experiences for a variety of trail users.
- Goal 2: A trail network that shares the historic, scenic, natural, and recreational significance of the Park.
- Goal 3: A trail network that minimizes its footprint on the Park's historical, scenic, natural, and recreational resources.
- Goal 4: A trail network that can be sustained.
- Goal 5: Cooperative partnerships that contribute to the success of the Park trail network.

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The Draft EIS states that the preferred alternative is Alternative #5 (ReUse, Recreation, and Destination), which includes an increase of 37 miles of trails from existing conditions, including 10 miles designated for mountain bikes, new and expanded parking facilities, new launch sites for water trail access, and expansion of hike-in and paddle-in campsites.

Based on our review of this document, EPA has assigned the Draft EIS a rating of **"Lack of Objections" (LO)**. However, we note several measures we believe would further reduce impacts to human health and the environment over the term of the Plan and improve the quality of the document. These measures should be committed to in the Record of Decision (ROD). Please see the enclosed summary of the rating system used in the evaluation of the document.

#### Low-Impact Design

Alternative #5 includes approximately 7.45 acres of new or expanded parking lot area and new paddle launch sites and campsites. EPA recommends that all new or expanded facilities, including but not limited to parking lots, shelters, buildings, and roads, are constructed following low-impact design standards, including programs such as Leadership in Energy and Environmental Design (LEED), Energy Star appliances, EPA's WaterSense Program, or other similar programs. New parking lots and other paved surfaces should use permeable or porous pavement technology to ensure increased stormwater infiltration and reduced runoff to adjacent waterbodies. EPA also recommends vegetated buffers and inlets around and in paved areas to further increase infiltration. Any such efforts should be outlined in the Final EIS. For additional information on green infrastructure, please visit: <http://water.epa.gov/infrastructure/greeninfrastructure/index.cfm>.

#### Aquatic Resources

Please be aware that the Cuyahoga River is an EPA-designated Great Lakes Area of Concern based on degraded fish populations, eutrophication, and heavily polluted sediments (restrictions on dredging). Therefore, any actions taken in the Cuyahoga River watershed should not exacerbate existing environmental issues, nor detract from remediation efforts as pursued by EPA or other governmental resource agencies. All mitigation measures detailed in this letter are intended to minimize potential impacts to the Cuyahoga River watershed.

The forthcoming wetland delineation (page 165 of the Draft EIS) should take place during the growing season, and not during drought conditions. Please include the delineation in the Final EIS and any jurisdictional determination correspondence from the U.S. Army Corps of Engineers.

Alternative #5 includes construction activity within the 100-year floodplain of the Cuyahoga River, within 25 to 125 feet of wetlands, and includes 84 new stream crossings. Some boardwalks are already included as part of this alternative. EPA strongly encourages boardwalk trail systems be pursued, as opposed to fill or culverting, at all stream crossings and in wetlands. Boardwalk crossings should span the channel of the stream and any boardwalk posts or fill should be kept above the ordinary high water mark of stream channels. Please note that trail design resulting in fill could be subject to Clean Water Act Section 404 permitting as well as the Clean Water Act



404(b)(1) Guidelines. Finally, EPA recommends a protected buffer of 50 feet around wetlands and streams; no new campsites, parking facilities, or other structures should be sited within 50 feet of wetlands or streams.

During construction of new trails or removal of existing trails, EPA encourages that work not be done in wetlands, including equipment staging. If any work needs to be done in or near wetlands or streams, EPA recommends the following measures to minimize impacts to aquatic resources:

- Construct during winter, if feasible.
- Minimize width of temporary access roads for construction access.
- Use easily-removed materials for construction of temporary access roads (e.g., swamp/timber mats) in lieu of materials that sink (e.g., stone, rip-rap, wood chips).
- Use swamp/timber mats or other alternative matting to distribute the weight of the construction equipment. This will minimize soil rutting and compaction.
- Use vehicles and construction equipment with wider-tired or rubberized tracks or use of low ground pressure equipment to further minimize impacts during construction access and staging.
- Use long-reach excavators, where appropriate, to avoid driving, traversing, or staging in wetlands.
- Place mats under construction equipment to contain any spills or leaks.

#### Diesel Emissions

Per the National Ambient Air Quality Standards for criteria pollutants, the Park is within counties or areas that are in non-attainment (8-hour ozone, annual  $PM_{2.5}$ , and 24-hour  $PM_{2.5}$ ) and in maintenance (1-hour ozone,  $PM_{10}$ , and  $SO_2$ ). Further, the National Institute for Occupational Safety and Health (NIOSH) has determined that diesel exhaust is a potential occupational carcinogen, based on a combination of chemical, genotoxicity, and carcinogenicity data. Acute exposures to diesel exhaust have been linked to health problems such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Based on this information, EPA recommends the following measures are implemented by NPS and its contractors to further reduced impacts to human health from diesel emissions during construction or removal of trails and other facilities.

- Use ultra low-sulfur diesel fuel.
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, thereby reducing the exposure of personnel to concentrated fumes.
- Use catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Attach a hose to the tailpipe of diesel vehicles running indoors and exhaust the fumes outside, where they cannot reenter the workplace. Inspect hoses regularly for defects and damage.

- Use enclosed, climate-controlled cabs pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Regularly maintain diesel engines, which is essential to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Purchase new vehicles that are equipped with the most advanced emission control systems available.
- With older vehicles, use electric starting aids such as block heaters to warm the engine reduce diesel emissions.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a NIOSH approval number.

In the Final EIS, please indicate whether recommended mitigation measures were included in the analysis. Again, any mitigation measures should be committed to in the ROD.

Thank you in advance for your consideration of our comments. If you have any questions, please contact Elizabeth Poole of my staff at (312) 353-2087 or [poole.elizabeth@epa.gov](mailto:poole.elizabeth@epa.gov).

Sincerely,

*Kathleen Kowal*

*for* Kenneth A. Westlake  
Chief, NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

Enclosure: Summary of Ratings Definitions

cc: Melissa Tarasiewicz, U.S. Army Corps of Engineers  
Bill Zawiski, Ohio Environmental Protection Agency  
Ed Wilk, Ohio Environmental Protection Agency

U.S. Environmental Protection Agency

Low Impact Design

**Concern Statement:** Best management practices are recommended to minimize the impacts of parking lot development and expansions.

**Response:** These recommendations have been included in the FEIS Sustainable Trail Guidelines (Appendix C, p.32) as they relate to best management practices for design and construction of newly developed or expanded parking areas within the Park.

Aquatic Resources

**Concern Statement:** Any actions taken in the Cuyahoga River watershed should not exacerbate existing environmental issues nor detract from remediation efforts. The forthcoming wetland delineation should take place during the growing season and not during drought conditions. Please include the delineation in the FEIS and any jurisdictional determination correspondence from the U.S. Army Corps of Engineers.

**Response:** The FEIS includes recommendations for wetland delineation on p. 28 of the Sustainable Trail Guidelines. Because of the conceptual and park-wide scale of the Plan, no specific delineations were conducted. Each trail project will undergo the delineation process if wetlands are within the proximity of the proposed trail. Therefore, no jurisdictional determination correspondence from U.S. Army Corps of Engineers was received as part of the FEIS.

**Concern Statement:** Best management practices are recommended for trails within proximity of water resources.

**Response:** We have included additional recommendations for trails within proximity of water resources in the FEIS Sustainable Trail Guidelines on p. 31. The Sustainable Trail Guidelines will set forth best practices throughout the trail development process.

Diesel Emissions

**Concern Statement:** The Park is within counties or areas that are in non-attainment for Ambient Air Quality. Recommendations are set forth to further reduce diesel emissions during construction or removal of trails and other trail facilities.

**Response:** We have included these recommendations in the FEIS on p. 39 of the Sustainable Trail Guidelines.

**Concern Statement:** Indicate whether recommended mitigation measures were included in the analysis. Any mitigation measures should be committed to in the ROD.

**Response:** Mitigation measures are set forth within the Sustainable Trail Guidelines, Appendix C of the Plan and within Chapter 4, for each resource issue. The Record of Decision will include any mitigation measures set forth in the Final EIS.





## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Ecological Services  
4625 Morse Road, Suite 104  
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July 17, 2012

Lynn Garrity  
Cuyahoga Valley National Park  
15610 Vaughn Road  
Brecksville, OH 44141

TAILS: 03E15000-2012-TA-1009  
03E15000-2012-CPA-0631

Dear Ms. Garrity:

This letter is in response to the Cuyahoga Valley National Park Draft Comprehensive Trail Management Plan and Environmental Impact Statement (Plan). The purpose of the Plan is to guide the expansion, restoration, management, operations, and use of the trail system for the next 15 years. Cuyahoga Valley National Park (Park) is located between Cleveland and Akron in Cuyahoga and Summit Counties, Ohio and consists of over 33,000 acres of bottomland forests, upland forests, open areas, wetlands, and riparian habitat along the Cuyahoga River. Implementation of the Plan will include restoration of the existing trail network such as rehabilitation of trails, relocating or realigning trails, or removal and closure of trails. It will also include construction of new trails and trail facilities such as parking lots, benches, and campsites.

The goals of the Plan include a trail network that minimizes impacts to park resources and can be sustained for future generations. Sustainable trail guidelines will be established by the National Park Service and will be adopted under all proposed alternatives. Site planning and design of the trail are important to avoiding impacts to natural resources and the Service supports appropriate siting to reduce impacts to wildlife and the habitats they depend on.

The Plan includes five different alternatives. Alternative 1 is the no action alternative. Alternatives 2, 3 and 4 each include an option A and an option B. All alternatives with option A do not include mountain bike use. All alternatives with option B do include mountain bike use. Alternative 5 includes components of all the alternatives and mountain bike use and has been identified as the preferred alternative.

There are no Federal wildlife refuges, wilderness areas, or Critical Habitat within the vicinity of this site.

Sustainable trail guidelines will be established by the National Park Service. Site planning and design of the trail are important to avoiding impacts to natural resources. The Service supports the use of neighborhood connectors to encourage local residents to access the Park without the use of an automobile.

The Plan considers impacts to water resources including water quality wetlands, floodplains and riparian areas. The plan will include stream crossings as well as canoe launch areas along the Cuyahoga River. The Service recommends that impacts to streams and wetlands be avoided, and buffers surrounding these systems be preserved. Streams and wetlands provide valuable habitat for fish and wildlife resources, and the filtering capacity of wetlands helps to improve water quality. Buffers of native vegetation surrounding these systems are also important in preserving their wildlife-habitat and water quality-enhancement properties. The Park has established a minimum buffer around wetlands of at least 25 feet with greater buffers for higher quality wetlands.

Stream crossings will be located at riffle areas as these areas are relatively stable. The Plan indicates that trails sited near wetlands or within floodplains may utilize a boardwalk system. The Service supports the use of boardwalks to avoid impacts to aquatic resources. We recommend that cadmium chromium arsenate and creosote treated lumber not be used for segments of boardwalk structures that are in contact with water. The Sustainable Trail Guidelines indicate that elevated crossings are preferred over culverts. The Service recommends that if culverts are used they are designed and placed to adequately simulate the natural stream morphology and substrate. This will help to maintain connectivity for organisms that use the streams to move between vital habitat types.

The Plan includes the expansion of parking lots to accommodate areas of high visitor use. Additional trails and parking lots often involve the addition of a significant amount of impervious surfaces which can lead to increased runoff. Increased runoff levels create higher temperatures in receiving streams, greater downstream flooding and erosion, and reduce the recharge of aquifers. The plan addressed concerns about the potential increase in impervious surfaces. The Service recommends that the use of asphalt be minimized as much as possible for both trails and parking lots. The Service supports the use of limestone gravel material as a trail surface instead of other impervious surfaces such as asphalt.

Runoff can be reduced through the use of permeable pavement or by reducing the amount of impervious surface by clustering development and decreasing the area of parking lots, roads, and sidewalks. Increased infiltration through the reduction of ground disturbance, especially in forested areas, will also reduce levels of runoff. Increased detention time through the increased length of conveyance will also reduce runoff flows. While the main objective should be to reduce runoff as much as possible, protection and enhancement of riparian buffers can mitigate some impacts from the runoff that does occur. The Service recommends that the project should fully address impacts to stormwater quantity and quality. The Plan indicates that the total amount of impervious structures does not significantly affect the overall percentage of impervious surfaces of the Park's tributary watersheds. In addition, the Sustainable Use Guidelines will minimize the disturbance of natural areas.

The Plan identifies concerns about soil suitability and slope gradient. The Plan indicates that the visitor use carrying capacity will be established for each designated trail. Seasonal closures can be implemented to reduce impacts to park resources and minimize the risk of tread widening. We recommend that any proposed projects use best construction techniques to minimize erosion. The Plan addresses impacts to vegetation such as trampling, fragmentation, and proliferation of exotic species. Prevention of non-native, invasive plant establishment is critical in maintaining



quality habitats. The Plan addresses the increased threat of invasive species due to the development of trails in primitive areas. It indicates that exotic plant management activities and habitat restoration actions that are focused on disturbed areas will have long-term beneficial impacts. The restoration of trails through the consolidation of duplicate trail segments and the elimination of non-designated or 'social' trails will result in improved impacts to native vegetation. The potential threat of exotic aquatic species should also be considered. The Plan includes ten sites which are being considered as paddle access sites. Paddle launch sites and riverside campsites have the potential to become introduction sites for aquatic invasive species as equipment that may have been used in other impacted streams could carry seeds or larvae of exotic species. These areas of access should be considered high priority areas for monitoring so that invasive species can be addressed before they become well established.

The Plan considers impacts to wildlife through habitat fragmentation and disturbance by human noise. The Horseshoe Pond perimeter loop trail at Tree Farm Unit will be located around Horseshoe Pond. A trail directly along the entire perimeter of the pond would make wildlife using this resource highly susceptible to human disturbance. The pond should not be completely enclosed by trails or the trails should be located some distance from the pond so that aquatic wildlife is not continuously disturbed by visitors on the trail. The Sustainable Trail Guidelines indicate that tree clearing will be minimized as much as possible and that native vegetation will be retained as much as possible, thus limiting impacts to wildlife habitat.

#### MIGRATORY BIRD COMMENTS:

The Park has been designated as an Important Bird Area and contains significant habitat for a diversity of bird species. The Park contains many large blocks of contiguous forest habitat. These areas provide suitable habitat for a variety of forest interior nesting birds. Three trails are near known bird nesting areas. In addition, there are several great blue heron rookeries located within the area. Previously the Service recommended establishing a buffer of 200 meters from Great Blue Heron rookeries. This recommendation remains valid. The Coliseum Trail is sited along the perimeter of the grassland to minimize impacts to grassland birds nesting at the site.

The project lies within the range of the **bald eagle** (*Haliaeetus leucocephalus*). Bald eagles are protected under the Migratory Bird Treaty Act (16 U.S.C. 703-712; MBTA), and are afforded additional legal protection under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d, BGEPA). BGEPA is the primary federal law protecting bald eagles and prohibits, among other things, the killing and disturbance of eagles. "Disturb" is defined by regulation (50 CFR 22.3) as, "to agitate or bother a bald or golden eagle to a degree that causes...injury to an eagle, a decrease in productivity, or nest abandonment." The Service recently issued a final rule that authorizes issuance of eagle take permits, where the take to be authorized is associated with otherwise lawful activities. Further information on eagle take permits and assessing your project's potential effect on bald eagles can be found at: <http://www.fws.gov/midwest/MidwestBird/EaglePermits/index.html>.

A bald eagle nest is located in the Pinery Narrows area of the Park. The plan indicates that portions of the Towpath Trail are closed seasonally to avoid impacts to this species. In order to avoid take of bald eagles, we recommend that no tree clearing occur within 660 feet of the nest or within the woodlot supporting the nest tree. Further we request that work within 660 feet of the nest or within the direct line-of-sight of the nest be restricted from mid-January through July. This will prevent



disturbance of the eagles from the egg-laying period until the young fledge, which encompasses their most vulnerable times. We ask that you consult with this office if any tree removal is required within the buffer area to confirm that the eagles have left the nest.

If these recommendations cannot be implemented and take of bald eagles is likely, based on the best information available, a bald eagle take permit for this project will be necessary. As noted earlier, under 50 CFR § 22.26, bald eagle take permits can be issued where the taking is associated with but not the purpose of an otherwise lawful activity and cannot practicably be avoided. Eagle take permits may require monitoring (pre, during, and post construction), avoidance and minimization to the fullest extent practicable, as well as mitigation. If you would like to pursue this option or discuss it in more detail, please contact Matt Stuber, in the Service's East Lansing Field Office, at 517-351-8469, or at [Matthew\\_Stuber@fws.gov](mailto:Matthew_Stuber@fws.gov). Additional information on eagle take permits is also available at: <http://www.fws.gov/midwest/MidwestBird/EaglePermits/index.html>.

#### ENDANGERED SPECIES COMMENTS:

The proposed project lies within the range of the **Indiana bat** (*Myotis sodalis*), a Federally-listed endangered species. Since first listed as endangered in 1967, their population has declined by nearly 60%. Several factors have contributed to the decline of the Indiana bat, including the loss and degradation of suitable hibernacula, human disturbance during hibernation, pesticides, and the loss and degradation of forested habitat, particularly stands of large, mature trees. Fragmentation of forest habitat may also contribute to declines. Summer habitat requirements for the species are not well defined but the following are considered important:

- (1) dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas;
- (2) live trees (such as shagbark hickory and oaks) which have exfoliating bark;
- (3) stream corridors, riparian areas, and upland woodlots which provide forage sites.

With the significant amount of forested habitat and the multitude of streams and wetlands the Park appears to provide a significant amount of potential habitat for this species. The Indiana bat, along with six other bat species, has been detected within the Park. At this time no hibernacula or maternity roosts for the Indiana bat have been identified. The Sustainable Trail Guidelines indicate that all healthy trees with a DBH of 12 inches should remain. The Plan indicates that site-specific evaluation will occur for campsites, trails, water trail facilities, parking areas, and trail shelters. Due to the length of the proposed Plan and the lack of site specific information on tree clearing available at this time, the Service recommends that coordination occur between the National Park Service and the U.S. Fish and Wildlife Service on any projects that require tree clearing when site specific plans are finalized. No tree removal should be scheduled during the summer roost season of April 1 to September 30.

Please be aware that the northern long-eared bat (*Myotis septentrionalis*) and the eastern small-footed bat (*Myotis leibii*) have been petitioned for listing under the Endangered Species Act. These species may be proposed for listing within the next few years. Once such a proposal has been published in the Federal Register, conferencing with the Service may be required under section 7 of the ESA for projects that may affect these species. The status of the little brown bat (*Myotis*

*lucifugus*) is currently being reviewed by the Service. Both the northern long-eared bat and the little brown bat have been documented within the Park.

The proposed project lies within the range of the **Kirtland's warbler** (*Setophaga kirtlandii*), a federally listed endangered species. The Kirtland's warbler is a small blue-gray songbird with a bright yellow breast. This species migrates through Ohio in the spring and fall, traveling between its breeding grounds in Michigan, Wisconsin, and Ontario and its wintering grounds in the Bahamas. While migration occurs in a broad front across the entire state, approximately half of all observations in Ohio have occurred within 3 miles of the shore of Lake Erie. During migration, individual birds usually forage in shrub/scrub or forested habitat and may stay in one area for a few days. Due to the project type, location, and onsite habitat, this project is not expected to result in impacts to Kirtland's warbler. Relative to this species, this precludes the need for additional consultation at this time.

The project lies within the range of the **piping plover** (*Charadrius melodus*), a federally listed endangered species. Due to the project type, location, and onsite habitat, this species would not be expected within the project area, and no impacts to this species are expected. Relative to this species, this precludes the need for further action on this project as required by the 1973 Endangered Species Act.

The proposed project lies within the range of **northern monkshood** (*Aconitum noveboracense*), a federally listed threatened species. The plant is found on cool, moist, talus slopes or shaded cliff faces in wooded ravines. The Sustainable Trail Guidelines require the avoidance and setbacks from endangered, rare, and special status plant species. The Plan indicates that no appropriate habitat for this species has been found.

This technical assistance letter is submitted in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C.661 et seq.), the Endangered Species Act of 1973, as amended, and is consistent with the intent of the National Environmental Policy Act of 1969, and the U.S. Fish and Wildlife Service's Mitigation Policy.

If you have any questions regarding our response or if you need additional information, please contact Jennifer Finfera at extension 13.

Sincerely,



Mary Knapp, Ph.D.  
Field Supervisor

cc: ODNR, DOW, SCEA Unit, Columbus, OH

U.S. Fish and Wildlife Service

**Concern Statement:** The Service recommends that impacts to streams and wetlands be avoided and buffers surrounding these systems be preserved. The Service recommends additional practices be included within the Sustainable Trail Guidelines of the Trail Plan related to boardwalk systems and culverts. (pg2, paragraphs 1 and 2)

**Response:** We have established guidance to protect and minimize impacts to wetlands and streams through the lifecycle of a trail. NPS has incorporated the USFWS recommendations for boardwalks and culverts into the Sustainable Trail Guidelines (Appendix C; p 31).

**Concern Statement:** The Service recommends additional best management practices for parking lot design and construction, and stormwater quantity and quality. (pg 2, paragraphs 3 and 4)

**Response:** The Sustainable Trail Guidelines set forth parking lot design best management practices and will continue to identify design solutions to minimize any impervious surface expansion for parking facilities within the Park. Additionally, NPS will identify and prioritize parking lot expansion based upon park user patterns to limit overdevelopment of facilities where visitor use demands are not present, as described on p.32 of the Sustainable Trail Guidelines.

**Concern Statement:** The Service recommends best construction techniques to minimize erosion. (pg 2, paragraph 5)

**Response:** We identify minimizing erosion as a primary design goal of future trails and provide best practices within the Sustainable Trail Guidelines.

**Concern Statement:** The potential threat of exotic aquatic species should be considered in relation to the expansion of facilities for canoes and kayaks on the Cuyahoga River. (pg 3, paragraph 1)

**Response:** We have included development of best management practices and monitoring of exotic aquatic species in the FEIS on p. 56 as part of the Park's operating procedures for future river use.

**Concern Statement:** The Horseshoe Pond perimeter loop trail at the Tree Farm unit should consider the disturbance of aquatic wildlife by visitors on the proposed trail. (pg 3, paragraph 2)

**Response:** We will consider existing and potential future aquatic wildlife in the final layout and design of the Horseshoe Pond perimeter trail to minimize its impacts. The Trail is considered a low use trail during the summer months and high use for cross-country skiing during the winter months. Visitor use will continue to be monitored to address disturbance potential. NPS will utilize its Sustainable Trail Guidelines to minimize clearing of native vegetation for the trail design.

**Concern Statement:** The Service recommends buffer distances for tree clearing for bald eagle habitat. (Migratory Bird Comments)

**Response:** We currently have a policy for bald eagle protection during nesting based upon recommendations set forth by U.S. Fish and Wildlife Service for non-motorized recreation and human entry. Since the first bald eagle nest attempt within the Park in 2008, NPS has instituted an area closure at a radius of 330 feet from the nest between approximately February 1 (at observation of mating/ egg-

laying) and July 15 (post-fledging) annually. The Park will adhere to the Service's recommended buffer distances to the extent that land ownership permits. Tree clearing during nesting and fledgling periods within the 330' buffer area only occur under hazardous or emergency conditions pertaining to the active railroad and Towpath Trail. These recommendations have been updated in the Sustainable Trail Guidelines on p. 27.

**Concern Statement:** Consultation with USFWS for Indiana bat impacts for each trail project site during implementation is recommended. (Endangered Species Comments)

**Response:** We have revised the Sustainable Trail Guidelines (Appendix C p. 28) to include this recommendation as part of the trail development process.

#### Ohio State Historic Preservation Office

The Draft Trail Plan and EIS were submitted to the Ohio State Historic Preservation Office (SHPO) on August 6, 2012. NPS received SHPO comments on November 21, 2012. A letter of concurrence of no adverse effect pertaining to the guidance measures set forth within the Trail Management Plan and guidance for future consultation between NPS and SHPO on all individual projects of this Plan during implementation was received from SHPO on January 22, 2013. The SHPO's comments and NPS responses are included.





November 8, 2012

Superintendent  
Cuyahoga Valley National Park  
National Park Service  
ATTN: Paulette Cossel, Lynn Garrity  
15610 Vaughn Road  
Brecksville, OH 44141

Re: Trail Management Plan: Draft EIS (PEPC 27315  
Cuyahoga and Summit Counties, Ohio

Dear Paulette Cossel, Lynn Garrity,

This is in response to correspondence from your office received June 22, 2012 (documentation made available on web site), and August 8, 2012 (bound, hard copy, of Plan with Assessment of Actions Having An Effect On Cultural Resources form), regarding the above referenced project. The comments of the Ohio Historic Preservation Office (OHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]).

Our comments present a critique of the EIS document as part of a formal review process. We recommend reinforcing the document to give more emphasis to planning principles. We recommend a more direct presentation of real world alternatives with less emphasis on the somewhat academic distinctions between the somewhat abstract and theoretical alternatives. For instance, in our opinion there is too much emphasis on the number of miles of trails. It is almost as though the alternatives are quota based. It is difficult for most readers to readily grasp the differences between the total miles. We recommend incorporation of specific applications in describing the planning process. And, we recommend basing analysis on empirical data.

I have hiked and biked on CUVA trails. I have greatly enjoyed my experiences. There have been a couple of days when it was cold, windy, and rainy, but I guess any such complaints should be directed to a different federal agency. The trails offer a range of experiences, destinations, and opportunities. Adding to my favorable experiences, I found signage with interesting information.

The EIS documents present a trail management plan. We are not sure how conclusions were reached. For instance, we are told that the implementation of the trail management plan will result in negligible impacts, or no more than minor impacts, to cultural resources. How much damage has occurred in the past 10 years? How much damage is expected during the next 10 years under the trail management plan? In sum, we are left with the impression that the conclusions are already set and we don't have a sense that information is logically analyzed to reach and support conclusions. Clearly we see that there are sections within the documents where the analysis of information is presented. We recommend that much more emphasis needs to be placed on generating information specific to meaningful analysis.

The EIS includes the CUVA Sustainable Trail Management Guide. This guide contains valuable information. The guide includes forms to record situations and conditions along trails. Although we see the guide as a valuable and useful document, we are not sure that we understand how the use of the guide will be integrated into planning and consultation.

We will try not to overwork the analogies for management plans. In one sense management plans are like roadmaps in that they guide us from where we are to where we are going along established routes. The trail management plan seems to take pieces and parts from many different maps. Our overall impression is that we aren't sure of the route. That is, as decision points are reached it isn't clear to us how the National Park Service will determine which route it is following. It isn't clear to us how decisions will be made to prioritize trail expansion projects. For instance, how will the National Park Service balance increasing need for maintenance of a surface good for biking along the tow path trail with the need for extending miles of upland hiking trails?

We do not understand how the National Park Service reached the conclusion that Alternative 5 is the preferred alternative. In part this is because we are not sure we understand what Alternative 5 is. We do not understand how Alternative 5 is integrated into a single trail management plan.

In the analysis of the use of a place by people it can be useful to distinguish nodes from connections. One of the consequences of adding more trails will be the construction of more trailheads with parking lots and facilities. However, when compared to Alternatives 3 and 3A, it seems to us that although Alternatives 4 and 4A result in more access points that each of these nodes will be smaller than the development and expansion of mostly existing nodes under Alternatives 3 and 3A. It isn't clear to us if the cumulative impacts from more trail expansion and more, but smaller, trailhead additions would be greater than the cumulative impacts from the larger scale developments at existing nodes with less added trails and increased emphasis on maintaining existing trails. We believe that it is vitally important for the management plan to provide clear direction in obtaining meaningful data and analysis to allow informed decision making.

We believe that there are real world benefits in making distinctions among different kinds of trails within an integrated planning process. In planning the appearance and design of trails and parking lots, it's clear that they will be read by visitors as being "Park" if they follow a standard design aesthetic. Is it possible to clarify whether another acceptable design scheme can be established and followed in the less natural settings of the park, in proximity to above ground resources? The need for consistent visual cues is understood, but the more natural areas of the park will not require the same level of intensive hardscape as might ultimately be selected to reduce impacts that might occur from more rustic amenities placed in proximity to historic resources. In summary, we recommend less emphasis on creating numbered alternatives and more emphasis on establishing the utilitarian basis for the preferred management plan.

Turning to considerations of cultural resources, we have questions about the goals of the trail management plan and about how the conclusions of negligible impacts were reached. There are several distinctly different kinds of cultural resources and distinctly different kinds of archaeological sites within the Park. There are some cultural resources that are already considered destinations



Paulette Cossel, Lynn Garity  
November 8, 2012  
Page 3

and there are other kinds of cultural resources that we seek to protect. However, the sole criterion for analysis seems to be whether the property is already listed in the National Register of Historic Places. The trail management plan provides for a comprehensive review of new trails but it doesn't tell us how decisions about the starting and ending points and the route will be decided. The plan seems to presume that all trails will always avoid important archaeological sites. We agree that a good deal of weight should be given to avoiding effects at important archaeological sites. But there are important archaeological sites that should be shown to the public. How will the National Park Service make decisions about which cultural resources are destinations, which cultural resources should be accessible along paths, and which cultural resources should be avoided?

As one example, we are concerned that some of the known projects (like the trail at Virginia Kendall SP Historic District) rely heavily on National Register data regarding the status of individual landscape elements (like the "social trail"). Transportation networks are typically incrementally designed and constructed as specific local resources are accessed or as human activities occur that are related to certain features of a site. Is it the expectation that trails currently used, but deemed unnecessary to the park's visitors, will all be of modern origin and not be related to previous occupational patterns of use? Many NR nominations do not provide a sufficient level of analysis to support that assumption. In our opinion the process of selecting individual future trail segments needs to have a deliberative step that assesses the likely age and significance of existing pathways, before they are selected for elimination or replacement.

Planning should be based on real time data. What is the current status? How many different kinds of situations requiring trail maintenance have been reported in the past 10 years? Does the Park systematically and systemically record these kinds of situations? What difference does the Park expect over the next 10 years with the implementation of the trail management plan? Will there be fewer situations? Will situations be more rapidly recognized and thus more quickly contained?

It isn't clear to us how the trail management plan will assess effectiveness, use, and condition. The Sustainability guide includes a form for reporting trail conditions. This is a good first step but doesn't provide clear responsibility for analyzing this information. It would be helpful to establish standardized measurements so that the assessment of effectiveness is more transparent. It would be helpful to separate analysis of effects by different kinds of trails and different kinds of effects. For instance, erosion along the tow path trail should be evaluated differently from erosion along an upland hiking trail or along an upland mountain bike trail. Erosion along the tow path trail affects a cultural resource, but it would seem to us that it would take a great deal more erosion along the tow path trail to result in an adverse effect to a cultural resource than erosion in an upland setting near an important archaeological site.

It isn't clear to us how the plan will connect with the requirements for conducting and completing consultation for undertakings. The Advisory Council emphasizes the need for early consultation, but consultation early in project development needs to involve discussions that broadly consider preservation concerns and are not narrowly restricted to the presentation of findings of eligibility and effect. These findings will come near the end of the consultation process.

Paulette Cossel, Lynn Garity  
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Page 4

Too often, National Park Service consultation is too narrowly restricted to a blanket finding of "no adverse effect." Making a "no adverse effect" finding with no clear conditions listed for coordination with OHPO and other consulting parties, even in the event that historic properties are known to be present and will be affected by trail development, is too often out of step with Advisory Council guidance and too often not helpful. From the standpoint of following the standard 106 consultation process, which is described in the Plan, concurrence is facilitated when a NAE finding is conditioned with a clear statement specifying exactly how coordination necessary to fulfilling the condition would occur.

Also we too often find that the timing of coordination during consultation is at odds with the overall objectives of the planning process we see as necessary for trail development and management. For instance, while MAC is available to assist with any necessary surveys, that practice of calling on MAC has already been problematic in regards to the timing of the submission of their research data with the concomitant submission of individual projects to OHPO for review. Reports come after consultation is already assumed to have concluded. From our perspective, it would seem practical that a set planning process be followed allowing possible trail segments for a particular area to be systematically studied by MAC, then that data be made available to CUVA and OHPO early enough that it is clearly supportive of their apparent intent to practice avoidance. If the intent is to reach concurrence on avoidance prior to creating a commitment to a specific trail segment, then CUVA needs to better link the Plan with the consultation process. At this time we can't tell what they're going to do.

Finally, regarding the Assessment Of Actions Having An Effect On Cultural Resources form attached to the August 6, 2012, correspondence, especially under Part 5, we do not understand the basis for checking yes or no for several of the fields. For instance, in the ninth field "Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archaeological or ethnographic resources, in our view this should be checked as "yes" rather than "no" and needs to be consistent with other fields. Moreover, it is simply not possible to determine that no deterioration of historic features will begin or be exacerbated from the trail planning activities. That's just not a supported conclusion, given the types of resources that are already present within the environment that are proximal to existing trails, as well as the fact that new trails will be located in proximity to known historic properties and districts.

Perhaps we are reading too much into this. But, from our perspective it well illustrates a fundamental discord. Section 106 consultation procedures are founded on an assessment of effect. When planning for changes in proximity to cultural resources we recommend that early coordination and planning documents should at least convey a noted concern for the protection of significant cultural resources and leaving open the possibility of adverse effects. Throughout the Plan we find explicit assertions that trail planning and trail management cannot consider adverse effects. Thus it becomes impossible for the National Park Service to complete an analysis that it is required by its own policies to complete. We recommend revising the Plan to establish standards for planning, acquisition of data, analysis, and consultation, and to logically keep open the possibility that trail management can result in adverse effects.

Paulette Cossel, Lynn Garity  
November 8, 2012  
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Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "David Snyder".

David Snyder, Ph.D., RPA, Archaeology Reviews Manager  
Resource Protection and Review

DMS/ds (OHPO Serial Number 1044818, 1045478)





## United States Department of the Interior

NATIONAL PARK SERVICE

Cuyahoga Valley National Park

15610 Vaughn Road

Brecksville, Ohio 44141-3097

IN REPLY REFER TO:

H4217

January 16, 2013

Mark J. Epstein  
Resource Protection and Review  
Ohio Historic Preservation Office  
800 East 17<sup>th</sup> Avenue  
Columbus, Ohio 43211-2474

Project Name: Trail Management Plan [PEPC 27315]  
OHPO Serial Number 1044818, 1045478

Dear Mr. Epstein:

This is in response to correspondence from your office dated November 8, 2012 regarding Cuyahoga Valley National Park's draft Trail Management Plan and Environmental Impact Statement (Draft EIS) received by your office on August 8, 2012. The intent of this plan is to guide the expansion, restoration, management, operations, and use of the trail system and the associated amenities over the next 15 years. The Draft EIS is a lengthy and complex planning document and we truly appreciate the time and effort of your staff to review this submittal. We have synthesized the comments received and have provided a response to each concern.

As this document is a conceptual plan, it is understood that as individual elements are designed NHPA Section 106 will be completed for each undertaking which has the potential to impact resources listed in or eligible for listing in the National Register of Historic Places. This includes formal consultation with OHPO – Standard 36 CFR PART 800 – when appropriate. The goal of the National Park Service is to implement this plan in a manner which will have no adverse effects on cultural resources. While we acknowledge, as with every project, that there may be unforeseen developments which could result in an adverse action, this definitely is not the intent. If this were to happen the appropriate official process would be followed. If implemented as planned, however, we find that the proposal will have no adverse effect on cultural resources. If you concur with this determination please sign below and return a copy of this document to my office.

Thank you for your office's comprehensive review of our planning document. As always your knowledge and insight is appreciated.

Sincerely,

Paulette Cossel  
Historical Architect

If implemented as planned, I concur with the finding of no adverse effect.

Mark Epstein, Resource Protection and Review Department Head

1.22.13  
Date

**SHPO Comment:** In our opinion, there is too much emphasis on the number of trails. It is almost as though the alternatives are quota based. We recommend incorporation of specific applications in describing the planning process.

**Response:** The alternatives are not quota based. The alternatives were developed to explore the impacts at varying levels of trail development and location of trails. We found that through the impact analysis process that when trail miles of any alternative exceeded 135 miles within the Park, there were unacceptably higher adverse impacts. The methodology for the planning process and determination of trails included in the Alternatives is described in Chapter 2, 2.1, Development of Alternatives (Methodology).

**SHPO Comment:** We are told that the implementation of the trail management plan will result in negligible impacts, or no more than minor impacts to cultural resources. How much damage has occurred in the past 10 years? How much damage is expected during the next 10 years under the trail management plan? How is information logically analyzed to reach and support conclusions.

**Response:** NPS evaluated existing trails and their use through past condition assessments, information from park staff and level of use collected through trail and parking use count data. NPS conducted research on best practices for sustainable trails to minimize impacts in the future. As part of the Trail Management Plan Sustainable Trail Guidelines, NPS recommends the use of future condition assessments and carrying capacity evaluations in establishing evaluation and monitoring methods to identify thresholds for changes, adverse or beneficial, that may occur.

**SHPO Comment:** How will the use of the Sustainable Trails Guidelines be integrated into planning and consultation?

**Response:** The utilization of the Sustainable Trail Guidelines for planning and consultation are described in the Plan, 2.4.1, Sustainable Trail Guidelines and within Appendix C. The Guidelines are intended to be incorporated as the Park's Standard Operating Procedures for trail management.

**SHPO Comment:** How will the National Park Service decisions be made to prioritize trail expansion projects and also balance the increasing need for maintenance of the various types of trails?

**Response:** The Plan outlines the development of tasks for implementation in section 2.2.9, Implementation. A Trail Implementation Committee that include all divisions of the Park will work together to identify and prioritize projects and their balance with ongoing maintenance.

**SHPO Comment:** How was the conclusion that Alternative 5 is the preferred alternative? How is Alternative 5 integrated into a single trail management plan?

**Response:** The methodology for the development of Alternative 5 is included in section 2.5.8, Alternative 5 within the FEIS. Alternative 5 is integrated with Actions Common to All Alternatives and Actions Common to All Action Alternatives described in Chapter 2 to establish a Trail Management Plan for the Park to implement.

**SHPO Comment:** It is not clear if the cumulative impacts are greater from more trail expansion and more, but smaller, trailhead additions or from the larger scale developments at existing nodes with less added trails and increased emphasis on maintaining existing trails.

**Response:** The cumulative impacts are dependent on a variety of variables including location, proximity to sensitive resources, level of use and trail development levels including both trail miles and trail facilities.

**SHPO Comment:** It is recommended that less emphasis on creating numbered alternatives and more emphasis on establishing a utilitarian basis for the preferred management plan occurs, regarding the appearance and design of trails and parking areas depending on their setting within the park. The need for more visual cues is understood, but the more natural areas of the park will not require the same level of intensive hardscape as might ultimately be selected to reduce impact that might occur from more rustic amenities placed in proximity to historic resources.

**Response:** As a result of the findings of public scoping and goals established for the Plan, the Alternatives were developed. Specific placement and any particular trail features or trail facility will be determined during project specific planning and design, of which its physical setting will be considered in its placement and design.

**SHPO Comment:** How will the National Park Service make decisions about which cultural resources are destinations, which cultural resources should be accessible along paths, and which cultural resources should be avoided?

**Response:** The Sustainable Trail Guidelines include procedures for cultural resource assessment in section 3.1.3 of Appendix C, Sustainable Trail Guidelines, during all phases of the trail planning and design process to determine a trail's relationship to a cultural resource and the associated local conditions.

**SHPO Comment:** The process of selecting individual future trail segments needs to have a deliberate step that assesses the likely age and significance of existing pathways before they are selected for elimination or replacement.

**Response:** Section 3.1.3 Cultural Resources of the Sustainable Trail Guidelines, Appendix C will adhere to the evaluation of the trails identified for restoration within the Preferred Alternative and their associated cultural resources significance.

**SHPO Comment:** It would be helpful to establish standardized measurements so that the assessment of effectiveness is more transparent. It would be helpful to separate analysis of effects by different kinds of trails and different kinds of effects.

**Response:** The recommendations set forth within the Sustainable Trail Guidelines, Appendix C include the development and application of standardized measurements including condition assessments (Appendices J & K) and carrying capacity guidance measures (Appendix H). Additionally, Appendix G of the Sustainable Trail Guidelines outline a Trail Condition Management System to set forth guidance on park decision-making regarding trail management within the Park based upon the effects of each individual trail's setting and level of use.



**SHPO Comment:** Concurrence is facilitated when a No Adverse Effect finding is conditioned with a clear statement specifying exactly how coordination necessary to fulfilling the condition would occur.

**Response:** The Trail Management Plan outlines the actions common to all proposed actions for coordination to achieve no adverse effects in section 4.6.4.1, Impacts Common to All Alternatives. In addition, the Sustainable Trail Guidelines, Appendix C, provide procedures to meet these conditions for each trail project (3.1.3, Cultural Resources). The NPS has completed further consultation and concurrence with SHPO on how coordination and consultation will occur. The correspondence is provided within this section on page 307.

**SHPO Comment:** It would seem practical that a set planning process be followed allowing possible trail segments for a particular area to be systemically studied by the Midwest Archeological Center. The Park needs to better link the Plan with the consultation process. It is unclear to SHPO on the consultation process.

**Response:** The consultation for cultural resources is outlined in section 3.1.3, Cultural Resources within the Sustainable Trail Guidelines, Appendix C. Furthermore, compliance consultation is described in Section 4.6.4.1, Impacts Common to All Alternatives for cultural resources.

**SHPO Comment:** The Form attached to the August 6, 2012 correspondence "Assessment of Actions Having an Effect on Cultural Resources" is recommended to check "no" for the ninth field "begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources. It is simply not possible to determine that no deterioration of historic features will be or be exacerbated from the trail planning activities, given the types of resources present within the environment that are proximal to existing trails, as well as the fact that new trails will be located in proximity to known historic properties and districts.

**Response:** The analysis conducted for the Trail Management Plan and described in Section 4.6, Cultural Resources identifies the proximity of cultural resources to existing and proposed trails in the Preferred Alternative. With this general information and through trail specific planning, cultural resource evaluation and design, and the steps set forth within the Sustainable Trail Guidelines, Appendix C, the proposed actions will not contribute to the deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources.

**SHPO Comment:** When planning for changes in proximity to cultural resources we recommend that early coordination and planning documents should at least convey a noted concern for the protection of significant cultural resources and leave open the possibility of adverse effects.

**Response:** Chapter 4, section 4.6 outlines the conditions and compliance actions that will be implemented under the actions of the Trail Management Plan. A review of cultural resources and their proximity and potential effects from proposed actions under the preferred alternative were analyzed and described in this section of the Plan to provide a basis for further review and study for each trail project. As noted in Chapter 4, Section 4.6 and under the overall goals (1.1.3 Goals and Objectives) of the Plan, to minimize impacts on the Park's cultural resources will occur in all actions set forth in the Preferred Alternative of the Trail Management Plan/FEIS.

Ohio Department of Transportation  
Email correspondence received 7/26/2012  
Heather Bowden, Bike and Pedestrian Planner

**Concern Statement:** The Trail Plan should consider the current legislation for transportation enhancements funding, MAP 21, regarding bike lane improvements and federal land ownership. MAP 21 may set restrictions and use of funds if roadways are under federal jurisdiction.

**Response:** None of the roads recommended for bike lane improvements are under federal jurisdiction. Each bike lane project will be evaluated, in full cooperation with local jurisdictions, in regard to any new federal legislation, policy or law prior to implementation. NPS has included a statement on p.69 identifying evaluation of federal transportation legislation.

**Concern Statement:** The new 2012 AASHTO (American Association of State Highway and Transportation Officials) Guidance for Development of Bike Facilities may assist to determine the bike facility that is appropriate for road conditions.

**Response:** The Plan, on page 69 identifies the utilization of AASHTO guidance, when working with local jurisdictions and the proposed multi-use connectors recommended in the preferred alternative of the Trail Plan. The Plan has included the reference of the 2012 Edition of the AASHTO guidance on p. 69.



**ALAN BRUBAKER, P.E., P.S.**  
**SUMMIT COUNTY ENGINEER**

August 10, 2012

Superintendent  
Cuyahoga Valley National Park  
15610 Vaughn Road  
Brecksville, Ohio 44141

Attn: Lynn Garrity

**Re: Cuyahoga Valley National Park DRAFT Trail Management Plan  
and Environmental Impact Statement 2012.**

Dear Ms. Garrity:

The Summit County Engineer's office appreciates the opportunity to review the Cuyahoga Valley National Park DRAFT Trail Management Plan and Environmental Impact Statement 2012. We do not feel that it is proper for our office to recommend which of the eight alternatives should be implemented.

We do want to note that our office is pursuing a long-term goal of providing a more user-friendly environment for pedestrians and cyclists along the Summit County maintained roadway facilities. To that end in recent years, we have added paved shoulders to Kendal Park Road, and portions of Everett Road and Akron Peninsula Road. We will continue to provide paved shoulders with construction to start soon on a second section of Akron Peninsula Road and a portion of Riverview Road south of the Village of Peninsula. Additional sections of Riverview Road are on the five-year plan to receive paved shoulders.

Our office continues in our desire to cooperate with the CVNP to further define future trail access points and to provide a proper degree of highway user access to reach these destinations. If there are any questions regarding this matter, please contact our office.

Sincerely,

**Alan Brubaker, P.E., P.S.**  
**Summit County Engineer**

cc: file

538 E. South Street ♦ Akron, Ohio 44311-1843 ♦ Tel: 330-643-2850 ♦ Fax: 330-762-7829

Website: [www.summitengineer.net](http://www.summitengineer.net)

## NPS RESPONSE TO SUBSTANTIVE COMMENTS

**General:** The term mountain bike in the Draft EIS was changed to off-road single-track bicycle use to be consistent with the Code of Federal regulations (36 CFR Part 4) on bicycle use within the National Park Service.

### Purpose and Need: Park Purpose and Significance

**Concern Statement:** Public Law 93-555 cited in the Plan as the “legislative mandate” governing recreational use in Cuyahoga Valley National Park, is an unwise basis for the Plan. Part of the update to trail use in 2012 should be the recognition that Cuyahoga Valley is now a national park. Natural and scenic values should now be given the highest priority, with “maintenance of recreational open space” relegated to a much lower management activity.

**Response:** The changing of the park designation to a “National Park” did not change the underlying mission of this park unit, which is built on the 1974 law creating the unit. The Trail Plan’s preferred alternative meets the purpose of the Park as established by its founding legislation as discussed on p. 31 of the FEIS. Impacts to park resources and their values were taken into account for all proposed actions and included in Chapter 4, Environmental Consequences, of the FEIS, as required under NEPA.

**Concern Statement:** Land should be saved for its original purpose.

**Response:** We believe the Trail Plan’s Preferred Alternative meets the purpose of the Park as established by its founding legislation as discussed on p. 30 of the FEIS.

**Concern Statement:** The sharing of trails between equestrian users and hikers as a result of the removal of duplicate trails is in conflict with Goal 4 of the Trail Plan.

**Response:** The trails that are proposed for consolidation are low use, primitive trails with minimal user conflict risks that, when combined would provide a more effective and sustainable trail system by reducing the miles of primitive trail for management and maintenance, therefore meeting Goal 4. The Plan has been updated on p.52 to reflect that proposed duplicate trail removals are priority target areas for field evaluation to determine whether maintaining the specified trails will have no adverse impact to Park resources.

**Concern Statement:** The utilization of trails for mountain bike use on hiking trails appears to be in conflict of the objectives of Goals 1, 2 and 3 of the Trail Plan.

**Response:** After our environmental impact analysis, we believe that off-road bike trails do not provide any more impact on park resources than existing trail uses and in some cases fewer impacts. The park considered visitor use conflict, congestion and current and future visitor use patterns to determine a trail system for off-road bicycle use to meet the Trail Plan Goal 1 of providing experience for a variety of trail users. The proposed location also meets Goals 2 and 3 of the Trail Plan by providing the entire proposed trail system in the appropriate locations, without diminishing the park significance and utilizing the Sustainable Design Guidelines to minimize the trail network’s footprint of all trail uses, which includes the proposed off-road bike trails.

**Concern Statement:** Park operations needed to provide law enforcement and safe environments for trail use with the addition of mountain bike use is in conflict with Goals, 3 and 4 of the Trail Plan.

**Response:** The proposed location of the off-road bike trail in the preferred alternative is located in a new area with the utilization of the Bike & Hike trail as its primary access point. The proposed location and its nearby trail uses currently have low visitor use and will have vehicular access to the area for park operations. The proposed location and the utilization and expansion of volunteer trail patrol user groups will limit its contribution to Park operations needs and therefore not in conflict with Goals 3 and 4 of the Trail Plan.

**Concern Statement:** It is unclear how the park determined that it did not need to increase equestrian trail miles within the Park.

**Response:** This determination is outlined on p. 80 of the FEIS, Section 2.5.9. Given current use, limitations of land ownership and resource conditions, and current, planned or projected regional trail systems available to these user groups, significant expansions were not included in the final alternatives. This conclusion was developed as a result of the public scoping process and through the consensus of the Interdisciplinary Team for the Plan, including the Park's regional partners, Cleveland Metroparks and Metro Parks, Serving Summit County.

## Affected Environment

### Visitor Experience

**Concern Statement:** In the Plan, Table 23. Special Use Permits, does not reflect the equestrian events that hold a Special Use Permit.

**Response:** The Plan identifies the seven Equestrian events held in 2010 on p. 136. We have revised the FEIS to also include this information on p.128 associated with Trail Special Use Permits of the FEIS.

**Concern Statement:** The trail counts for equestrian trail use do not reflect actual use due to the counting locations, seasons and times of day.

**Response:** The purpose of our trail counts was to provide a snapshot of trail use during peak visitor use of the Park based upon 2010 monthly visitor data collected by NPS. We recognize seasonal use may differ, especially with no data collected for cross-country ski users. The Valley Bridle Trail counters were electronic infra-red counters that collected data 24-hrs for the counting period, hence the data collection period is much larger than the manual counts conducted which were limited to 2-hour periods on designated days of the week. The electronic counters were an additional data set that was not utilized for other trail uses, hence more data was collected for equestrian trails than for other uses during the counting periods. The Park will continue to monitor use on a wide variety of trails through a variety of counting methodologies and seasons to gauge trail use within the Park.

**Concern Statement:** The inclusion or exclusion of equestrians in the 2005 Visitor Use Study on p. 136 should be identified in the Plan.

**Response:** The 2005 Visitor Use Study was a survey at particular trail locations within the Park that had some locations where equestrian access occurs (Station Road, Boston Mills Parking Lot, Hunt Farm) but limited. NPS has included a statement to clarify equestrian inclusion in the Visitor Use Study on p.134 of the FEIS.

**Concern Statement:** Description of available equestrian trails within State Parks without similar information for all trail use types (hiking, cross-country skiing, mountain biking, multi-use) is discriminatory.

**Response:** We do not believe that collecting more information on specific topics is discriminatory. Since equestrians requested additional miles of trail for their use during public scoping but equestrian use is observably lower than hiking/walking, bicycling and running uses (Table 37, p.138), additional information was collected on available trails in Ohio's State Parks and the regional park systems within 20 miles of the Park to provide a regional context to these requests. We also provide the same analysis of trail miles within State Parks for mountain bike use on p. 139 of the Plan to evaluate similar requests for new trail mileage and to characterize the regional context.

## **Common to All Alternatives**

**Concern Statement:** The bridges on the Old Carriage Trail should be replaced and should be a high priority for the Park.

**Response:** The Park identifies the restoration of the Old Carriage Trail for visitor use within the Trail Plan and a park priority for FY2013. The Park continues to seek funding for the design, engineering and construction work required for this restoration.

**Concern Statement:** Updates to the public should be more often than five years as stated in the Draft Plan.

**Response:** We have included a statement on p.51 to include park review to consider additional interim updates to the Public on the progress of the Trail Plan implementation. The format and frequency of those interim updates will be determined as part of the implementation strategy of the Trail Plan.

**Concern Statement:** The layout of individual trails is unclear and may have issues pertaining to local conditions.

**Response:** The alignment of trails proposed in the Trail Plan are conceptual and provides only a general location for them as described on p. 64 of the Plan. The Plan identifies general park resources within 50' of the proposed trail. The Sustainable Trail Guidelines set forth procedures we will follow to ensure the best design is brought forward, adverse impacts to park resources are minimized, and trail user group expertise is involved where necessary.



**Concern Statement:** What will happen if funding to implement the Trail Plan is not available?

**Response:** The Trail Plan is intended to set a vision for implementation for the next 15 years. Implementation will be conducted as funding becomes available and projects are prioritized. This Plan will require us to seek a new approach for funding than traditional NPS base and capital budgets. The creation of a portfolio of funding sources is necessary to accomplish the recommendations set forth in the Trail Plan and will be part of the Implementation Strategy identified on p. 50 of the Plan.

## **Common to All Action Alternatives**

**Concern Statement:** Do not allow street motor bikes into the park system.

**Response:** Street motor bikes are not permitted on current or proposed park trails. We indicate this on p.80 of the FEIS. Off-road bike trails are proposed for non-motorized bicycles.

### **Sustainable Trail Guidelines**

**Concern Statement:** The public and trail user groups should be included in the trail development process as many have trail use expertise that would be valuable to trail implementation.

**Response:** We have included a statement regarding public and trail user groups in the FEIS on p. 7 of the Sustainable Trail Guidelines and on p. 50 of the FEIS under Implementation.

**Concern Statement:** Definitions and concepts used in the Sustainable Trail Guidelines should be included.

**Response:** We have included definitions as part of the Sustainable Trail Guidelines within the FEIS.

**Concern Statement:** Mountain bike trails in current trail-less areas should adhere to the Sustainable Trail Guidelines, given the unknown severity of their impacts.

**Response:** The Sustainable Trail Guidelines will apply to all trails and trail uses with the understanding that best management practices may differ for each trail use, level of trail use activity and specific location attributes. Impacts of off-road, single-tract bike use on park resources were evaluated in Chapter 4 of the FEIS.

**Concern Statement:** The Sustainable Trail Guidelines should include an established schedule for Guideline updates, a review of additional compliance prior to construction, visitor use evaluations, and an outlined protocol for taking action on user issues and conflicts.

**Response:** We have included additional statements in the Sustainable Trail Guidelines, under General Site Assessment (p. 7), regarding additional compliance needs. Monitoring visitor use will be part of the development of User Carrying Capacity guidance set forth in Appendix H of the Guidelines. We have also included a statement in the Trail Guidelines on p. 5 providing for a review of the utilization of the Trail Guidelines within five years and to determine the need for updates and future schedule for updates as deemed necessary.

**Concern Statement:** Water Trails are not represented in the Sustainable Trail Guidelines to the degree necessary to guide water trail design and use within the Park.

**Response:** We have included a statement on p. 12 of the FEIS Sustainable Trail Guidelines to identify the need for further expansion of sustainable design practices for water trails and have provided references to current available resources. We have updated Appendix B of the Guidelines to include Water Trails as a designated trail type.

**Concern Statement:** Avoiding bank hardening of river and riparian areas during Trail Plan implementation is not specifically addressed within the Sustainable Trail Guidelines.

**Response:** The Programmatic Riverbank Management Environmental Assessment addresses riverbank erosion which threatens historic and cultural resources including the Valley Railway, Towpath Trail and archeology sites. It defines techniques which limit hydromodification to the greatest extent possible through the use of natural materials, vegetation and the minimization of hardening. It also provides for the relocation of sections of the Towpath Trail if feasible. While some downstream erosion can be expected from hardening, the park's projects focus on incorporating bank "roughness" into the design with the inclusion vegetation and in-stream features which slow the flows and captures debris and sediments. The Park does not undertake bank hardening projects to protect infrastructure which are not historically or culturally significant resources such as trails or roads. Other entities such as utilities or road authorities do construct such projects and we actively work with them to encourage design similar to those used by the National Park Service. We have included a statement in the FEIS Sustainable Trail Guidelines in section 3.1.2 Natural Resources, p. 27 that trail planning will include utilization of the Park's Streambank Stabilization Plan guidance as part of the design and construction process.

**Concern Statement:** Clarification is requested regarding reference to Carrying Capacity Guidance, regarding its application for implementation.

**Response:** NPS has included additional statements on p. 49 of the FEIS regarding reference to carrying capacity guidance and its application during implementation of the Trail Plan.

**Concern Statement:** Past policies regarding trail sustainability have been that if a trail is in existence and crosses a stream, it stays. Trails identified for removal or restoration in these cases should remain and not subject to the CVNP Sustainable Trail Guidelines or riparian rules. It has been utilized for almost 20 years without damage to the landscape from the usage.

**Response:** The goal of the Sustainable Trail Guidelines and the Trail Plan is to provide an update to how to best sustain the trails within the Park. Trail design, construction techniques and trail use has evolved since the last Trail Plan. NPS will utilize the Sustainable Trail Guidelines on all trails within NPS lands and will work with both Metroparks on partner lands within the CVNP boundary to determine best design practices for individual trail conditions. NPS will utilize field evaluations to determine the best management approach to ensure adverse impacts are minimized or do not occur.

**Concern Statement:** Equestrian facility design measures such as mounting blocks and water access need to be considered in the design of equestrian trails within the Park.

**Response:** We have added a statement in the Sustainable Trail Guidelines, p. 16 of the FEIS regarding additional facility design measures for equestrian trails.

### **Restoration**

**Concern Statement:** Clarification of definitions for social trails and duplicate trails is requested

**Response:** We have clarified and added definitions for these terms within the Glossary 5.5.3 of the FEIS.

**Concern Statement:** The removal of duplicate parallel and/or social trails should be reconsidered. The proposed trail removals will affect visitor experience of hikers and equestrian users causing potential for increased conflict between trail user groups. Trails are in good condition or best management practices can be applied to improve them.

**Response:** The Trail Plan process included general evaluation of existing trails and their conditions related to sensitive park resources and the best management practices proposed in the Trail Plan's Sustainable Trail Guidelines. These conditions included proximity to known rare plant species, wetlands, and slopes greater than 15%. Additionally, trails that currently possess low trail use that when combined would assist in meeting the Trail Plan goal of the trail network minimizing impacts on park resources were considered.

We have added a statement on p. 52 of the FEIS that the areas identified for restoration, including the proposed trail removals, are priority areas for field evaluation. The field evaluation will follow the Sustainable Trail Guideline procedures to assess the condition of the trail and its future use. If the field evaluations identify that these trails (if allowed to remain), will contribute no new impacts to the trail system, then the NPS can consider foregoing closures or reroutes.

**Concern Statement:** The removal of trails, particularly on the Buckeye Trail and Perkins/Riding Run Trail system, will diminish visitor experiences and some areas identified may have alternative design approaches to examine prior to removal.

**Response:** A goal for the Trail Plan is to create a trail system that can be sustainable for future generations. As part of the Trail Planning evaluation process, trails were identified where landscape scale conditions exist that do not meet this goal of the Trail Plan. Conditions include slopes greater than 15%, wetlands, floodplains, and sensitive and rare plant species. Additionally, areas where parallel trails exist and low visitor use were identified for restoration or evaluation for removal to meet the goals of the Trail Plan. The Plan has been updated on p.52 that identified restoration areas as priority target areas for field evaluation to determine whether maintaining or realignment of the specified trails will have no new adverse impact to Park resources. The park will utilize the Sustainable Trail Guidelines to fully evaluate conditions and determination of trail restoration management actions.

## **Trail Facilities – Camping**

**Concern Statement:** Some proposed camp sites and parking lots could impose “unacceptable impacts” on park resources, as defined by NPS Management Policies (2006).

**Response:** Our impact analysis does not find campsites to have unacceptable impacts to park resources. Generally, the analysis finds some minimal impact possible on vegetation and soils due to increased trampling in remote areas of the Park. The campsites will be implemented incrementally, utilizing sustainable best design practices, to further determine visitor use patterns and any management actions necessary to avoid or mitigate unacceptable impacts on park resources from proposed campsites.

**Concern Statement:** More equestrian campsites should be evaluated and include consideration of the proposed Old Orchard site.

**Response:** The Trail Plan focuses on hike-in, paddle-in, bike-in or ride-in campsites, where motorized vehicles are not permitted. Equestrian camping requiring additional facilities that may include parking and use of motor vehicles for overnight use (e.g., full service campgrounds) is beyond the scope of this document. We may further evaluate other camping needs in a separate comprehensive planning document.

**Concern Statement:** Multiple comments were received regarding the level of development of campsites. Some comments discussed more developed campsites with less primitive conditions including water and sewer and others discussed campsites with limited development to retain the “serene” setting of the Park.

**Response:** The campsites proposed are primitive with no facilities associated with them. Our intention was to retain a more “remote” visitor experience and limit development. Other primitive campsites with some added facilities (toilets and water) are available at Stanford House and are proposed for expansion in the Boston Mills Area Conceptual Development Plan and Environmental Assessment.

**Concern Statement:** Operations procedures and conditions for campsites including fires, registration and fees, and human waste management are not characterized in the EIS.

**Response:** Prescriptive guidance for campsite operations will be developed as described under Guidelines for Campsites, General Campsite Regulations, on pp. 58-59 of the FEIS as part of the implementation of the Trail Plan. Guidance for use of fire pits, fees and human waste management are identified within the Plan to be included in those operating procedures

**Concern Statement:** Location of campsites should accommodate access for new trail use of mountain bike.

**Response:** Three of the proposed campsites (Buckeye-Dugway, Towpath-Red Lock, Towpath-Frazee) will be accessible by bicycle via the new proposed off-road bike trail and the Towpath Trail.



## **Trail Facilities - Paddle Launch Sites**

**Concern Statement:** Siting of the Ira Paddle Launch Site did not consider the physical and socioeconomic impacts to the fullest extent, including increased noise by river use to adjacent neighborhoods, proximity to potential prime agricultural lands and access to existing park facilities.

**Response:** The Ira paddle site was selected due to its location and access to the river and evaluated conceptually. It does not include agricultural lands for its use or facilities and is greater than 1,800 feet from residential areas of concern. Additionally the use of the river is limited to non-motorized vessels, which cause negligible noise pollution. NPS will identify the general area between Ira Road and Bath Road for a paddle launch site and determine the best site during detailed site design work for the site and have revised the FEIS to reflect this broader general area for the paddle launch site. Additionally, NPS will establish carrying capacity use limits and management actions for river use as part of its management program, including collecting river use data as paddle launch sites are implemented as outlined on p. 64 of the Sustainable Trail Guidelines to minimize adverse impacts of this facility.

**Concern Statement:** Does the Park intend to specifically address low head dams in this plan?

**Response:** The Park identifies the impacts of low head dams in Chapter 4, Visitor Use and Experience, p. 225. The FEIS has included additional statements on low head dams and how the NPS will address the issues associated with them on p. 56, under Guidelines for Water Trails.

**Concern Statement:** Skill classification for the Cuyahoga River has been identified as Class I with additional measures such as moving water for its use. Management of hazards, facilities and signage are significant safety issues which the Plan does not identify.

**Response:** We have included additional statements on p. 56 in the FEIS to identify an updated River Hazard Evaluation as part of the implementation strategy for river use.

**Concern Statement:** Does the Park intend to consult with paddling experts when implementing site plans?

**Response:** We have included an additional statement in 2.2.9 Implementation of the FEIS to include user groups in the site planning where applicable.

**Concern Statement:** Does the Park intend to develop a River Use Management Plan as a prerequisite to water trail implementation? Prior correspondence with the Park indicated that a water trail could be implemented through the Trail Plan and not require a River Use Management Plan.

**Response:** A River Use Management Plan will be necessary to identify the needs and opportunities required to institute park operations and management with regards to managed river use within the Park. The River Use Management Plan will establish the Standard Operating Procedures for water trail use within CVNP which are identified on FEIS pp. 55-56, (Guidance for Water Trails). The paddle launch sites under the Trail Plan establish general planning locations which can be prioritized as part of the Implementation Strategy of the Trail Plan. NPS has identified the initiation of a River Use Management Plan as a FY 2013 priority.

**Concern Statement:** The Plan does not identify specific statements regarding portages around dams in the Park.

**Response:** We have revised the FEIS to include recommendations on p. 56 and 57 for portages where are necessary due to existing dams.

**Concern Statement:** Distances between primary access sites for paddling access (pages 57-58) are greater than 10 miles in some locations which does not follow ODNR guidelines and the practices of current liveries on the Cuyahoga River. We recommend Boston Mills be added as a Primary Access Site.

**Response:** Implementation of all access sites will include consideration of distance between launch sites in conjunction with visitor safety and experience. We have included statements on p. 56 of the FEIS that identify that distance between access points and current conditions in other locations on the Cuyahoga River outside of park boundaries will be a consideration in the implementation phasing of the access sites. The Boston Mills access site will remain as a Secondary Site, subject to it becoming a Primary Access Site, if evaluation of detailed site conditions and the goals of the water trail system within the Park and beyond park boundaries will be accomplished. ODNR Water Trail Guidelines are identified within the Sustainable Trail Guidelines on p. 27.

## **Parking**

**Concern Statement:** Equestrian trailer size should be considered for new equestrian parking facilities.

**Response:** NPS has included a statement on p. 33 of the FEIS Sustainable Trail Guidelines that relates to equestrian parking design which includes trailer size considerations.

**Concern Statement:** The expanded parking lot development will contribute to congestion and pollution and may cause unacceptable impacts.

**Response:** The Trail Plan provides a framework for the next 15 years of the Park. The Sustainable Trail Guidelines (Appendix C; p. 32) outlines the NPS policy on parking area development and recommends that monitoring of user demand and the utilization of best management practices be part of any parking area improvements to minimize adverse impacts. The development footprint of the parking areas and associated impacts are described in Chapter 4, Environmental Consequences. The Trail Plan further introduces non-motorized access through connector trails and access to Scenic Railroad stations to provide alternative transportation options for park visitors.

**Concern Statement:** Clarification is needed for Table 4, p. 71 Additional Parking Areas 3A regarding inclusion or exclusion of equestrian parking areas for Alternatives.

**Response:** We have revised information for Table 4 on p. 70 of the FEIS.

**Concern Statement:** Clarification and additional statement is needed regarding Old Orchard Parking area replacing the Everett Covered Bridge Equestrian parking to emphasize that Old Orchard will replace Everett as the Equestrian parking area for this Trail Unit Area.

**Response:** A statement regarding this replacement is on p. 61 of the FEIS.

**Concern Statement:** The expanded parking area at Cancasi for the Mudcatcher Trail should not be considered since the intersection is dangerous with accidents frequently occurring there.

**Response:** Vehicle accidents at the intersection of Chaffee and Route 82 occurred with a frequency of 3 in 2010, 6 in 2011 and 2 in 2012 (Sagamore Hills Township Police Department, 2012). This parking area and associated trail has been revised as a conditional trail upon additional public involvement and community planning. A statement has been included noting this conditional status on p. 76 of the FEIS.

## Alternatives

### Individual Trails

**Concern Statement:** Some individual trails that were included in one or more Alternatives, but were not included in the Preferred Alternative should be added to the final Selected Alternative. (Suggestions included: West Rim, Tree Farm Extension, Boston Run Reroute, Riding Run Extension, Northern Trails, and Sagamore Hike Trail).

**Response:** As required under NEPA and NPS policies for implementing NEPA, we evaluated a wide range of different alternatives to consider and evaluate, and acknowledge that there are innumerable numbers of alternatives that could be considered in this type of plan. Trails included in the final selected alternative are a result of evaluating how trails helped meet the Plan's goals and objectives, the result of environmental impact analysis in Chapter 4 (Environmental Consequences), and input from the public during the preparation and review of this document. We believe the Selected Alternative focuses on the trail system best suited for the Park and its resources. Some proposed trails are located on lands under regional park jurisdiction and would require approval and their agency design process for implementation.

**Concern Statement:** The Plan is unclear on why a few specific trails are included in the Preferred Alternative and their overall benefits (i.e., Columbia Hiking Trail, Mudcatcher, Howe-Everett Connector).

**Response:** The NPS evaluated over 100 trail elements within the Environmental Impact Statement. Based upon the Environmental Impact Statement, the Preferred Alternative and the trail elements included within it best fits the Park's mission and resources and the specific goals and objectives of the Trail Plan.

### Alternatives Eliminated

**Concern Statement:** The NPS should reconsider the expansion of equestrian trails, including the proposed routes identified during public scoping that included from Pine Lane along Route 303 to Hike and Bike trailhead, heading south east of the Virginia Kendall trail system and linking back into the Wetmore equestrian trail system.

**Response:** The expansion of equestrian trails was dismissed for further analysis and consideration as described on p. 80 of the FEIS.

**Concern Statement:** The NPS should consider land acquisition for future trail development of individual trails that were not included in the Preferred Alternative.

**Response:** We discuss land acquisition for trails on p.80 of the FEIS under 2.5.9 Alternatives Considered but Dismissed, Property Ownership. We considered trails that required significant acquisitions to be non-viable, but that we did consider some trails with limited private land acquisition needs in the Plan. Specifically in the Preferred Alternative, the East Rim trail has potential private land acquisition requirements.

### **Alternatives New Individual Elements**

**Concern Statement:** Introduction of mountain bike use on additional existing trails is recommended to expand trail miles available for this recreational use and enhance visitor experience for this user group.

**Response:** Expansion of off-road bike use on existing park trails in various trail systems of the park was examined. The utilization of additional existing trails from the Preferred Alternative will not be a viable option within the Park, due to high visitor use, the types of users and the current trail use patterns. As trail use continues to be evaluated and monitored, the Park will continue to evaluate feasibility and perform any additional compliance requirements for shared use trails regarding off-road bicycle use on existing trails.

### **Alternatives: New Hybrid Alternative**

**Concern Statement:** The Preferred Alternative proposes mountain bike trails but does not exhibit the fullest potential in design and visitor experience for this use. The NPS should create a new hybrid alternative that would include establishing the 2B mountain bike trail on the Buckeye Trail as unconditional, include the South Carriage, Five Falls and the Highland Connector, maintaining the proposed loops in Alternative 5, and include the southern route to Little Meadow trailhead identified in Alternative 4B. Additionally, the South Carriage Trail should be included specifically because it is currently has “unofficial” mountain bike use.

**Response:** Each of these possible additions to the Preferred Alternative was evaluated during the impact analysis process. We concluded that 10-miles for off-road, single-track bike trails was an acceptable mileage based on scoping and examples in the regional trail network.

South Carriage Trail and Five Falls Trail will not be included as off-road bike trails in the Preferred Alternative due to unacceptable impacts on adjacent private property owners, minimal access for facilities such as parking, and trail design sightlines crossing at Highland Road.

While these social trails may already be present and utilized illegally today, our analysis on a variety of topics indicate that these locations do not provide the best off-road bike trail experience for the off-road bike user and create environmental impacts.

The extension of the off-road bike trail identified in Alternative 4B will not be considered as this proposed trail would have adverse impacts to park resources and increased potential for trail user conflicts as outlined in Chapter 4.



## **Trail Development**

**Concern Statement:** No new trails should be developed and future development should be limited. Such development has potential adverse effects.

**Response:** As stated in Section 1.1.2 Need for Action, the Park has experienced significant changes in visitation, programs and operations since the establishment of a trail system and initial Trail Plan in 1985. Additionally, outdoor recreation trends have continued to evolve the past 25 years on how visitors use or would like to use the Park. The additional development of trails and trail facilities will assist in meeting the needs of current and future visitation to the Park's trails. The majority (57%) of trail expansion exists in already developed areas of the park or adjacent to existing facilities. Three newly developed areas, High Meadow, East Rim and Mudcatcher, where no trails currently exist, are identified and an analysis of wildlife and habitat disturbance was conducted. Due to the proposed locations and siting of the trails, and the ecological conditions within these locations, any adverse impacts are expected to be minimal. The analysis of potential adverse effects of trail elements is provided in Chapter 4 of the document. Additionally, the use of the Plan's Sustainable Trail Guidelines will utilize best practices to minimize the adverse impacts of new trail development.

## **Impacts to Park Resources**

### **Concerns about Water Resources**

**Concern Statement:** The paddle site near Ira Road is located within 100-yr floodplain.

**Response:** All proposed paddle launch sites are proposed within the Cuyahoga River 100-yr floodplain as described on p. 166 of the Plan since such facilities are functionally dependent upon access to the water. The Plan and Sustainable Trail Guidelines (Appendix C) outline best management practices to minimize impacts to floodplain functions. As indicated in section 4.2.3, full compliance with DO 77-2: Floodplain Management will be completed prior to implementing any development in floodplain areas. This may include the preparation and public review of a Statement of Findings to evaluate floodplain impacts.

**Concern Statement:** Water quality will continue to pose a threat to river use within the Park, due to upstream pollution sources.

**Response:** We agree that water quality improvements need to continue to be pursued outside of park boundaries. Currently water quality monitoring is described in Section 3.6.7.3 of the Plan. We recommend within the Trail Plan on p. 55 expanding monitoring of river conditions within the Park to provide additional information to inform decisions on river uses.

### **Vegetation**

**Concern Statement:** All trails and specifically mountain bike trails will contribute to habitat fragmentation, wildlife disturbance, negative impacts to rural landscapes, degradation of landscape values and interruption of scenic views.

**Response:** The impact analysis results for these subject areas regarding off-road bike trail use is provided in Chapter 4 of the FEIS. The preferred alternative will best meet the purpose, need, and goals of the plan while minimizing resource impacts.

**Concern Statement:** The Buckeye Trail section proposed for mountain bike use is a high quality forest with a high population of bird species.

**Response:** NPS agrees and identified the high quality habitat conditions in Chapter 3, Wildlife section of the FEIS.

### **Wildlife and Wildlife Habitat Impacts**

**Concern Statement:** Habitat fragmentation and its relationship to trails are unclear.

**Response:** Habitat fragmentation is a consequence of adding trails to forested areas and is discussed in the Trail Plan in Chapter 4 on pp. 177 and 189. The specific methodology and impacts for all trail uses is described in these sections of the Plan. Each Alternative causes some habitat fragmentation, but the Preferred Alternative was found to best meet goals of the plan while not posing unacceptable levels of impact.

**Concern Statement:** New and expanded trails will increase disturbance to wildlife and diminish the available areas for habitat within the Park.

**Response:** We evaluated the impacts on wildlife and habitat, in relation to disturbance and habitat conditions within Chapter 4, Environmental Consequences. While some impacts may occur, the locations of the proposed trails, current habitat conditions and level of use on primitive trails are not likely to have major adverse impacts on park resources.

### **Threatened and Endangered Species: Impact of Proposal and Alternatives**

*Also see comments received and response from U.S. Fish and Wildlife on this topic.*

**Concern Statement:** Endangered pileated woodpeckers are present in areas proposed for new trails.

**Response:** The pileated woodpecker (*Dryocopus pileatus*) is not a species of concern listed under the Federal or State lists of threatened or endangered animal species. We evaluated wildlife impacts in Chapter 4. The Sustainable Trail Guidelines also consider wildlife impacts in the final layout and design of proposed trails.

### **Concerns about Soils**

**Concern Statement:** The introduction of mountain bike use on CVNP trails may impact soils and slopes and cause degradation of the resource.

**Response:** The Plan identified soils as an issue for all trail uses proposed in the Trail Plan. The impact analysis conducted included data and research on the impacts of all trail uses and any comparative differences. The analysis is presented on p. 199 of the Plan. The Sustainable Trail Guidelines have set

forth additional planning, design and construction measures to minimize adverse impacts to soil resources in the Park.

**Concern Statement:** Without provisions in place for best management practices for dispersed trailside campsites, these additions will increase soil erosion, unnecessarily disturb park flora and fauna and diminish the “remoteness” values of the Buckeye Trail. Additionally, utilization of “green pavement” to minimize soil compaction and erosion for parking areas is recommended.

**Response:** Our preferred alternative identifies designated trailside campsites (p. 78) and not dispersed campsites, due to the potentially greater impact of dispersed campsites on park resources. The Sustainable Trail Guidelines identify best management practices for parking areas and the continuation of incorporating emerging sustainable practices to minimize impacts to soil resources for these facilities.

## **Visitor Experience**

### **Trail Uses - Bike Lanes**

**Concern Statement:** Bike lane improvements on Riverview and Akron-Peninsula Road should be a priority.

**Response:** The NPS does not own the roadways identified in the Trail Plan for bicycle use improvements and only provides recommendations within its plan for bike improvements on local roads within the Park boundary. We will work with local and state government agencies to build cooperative efforts in prioritizing and implementing road improvements for bicycle use.

### **Trail Uses - Connections**

**Concern Statement:** Connectors between Towpath Trail and Hike and Bike Trail are not clear in the Plan and loops between the two trails should be included.

**Response:** Each connector between the Towpath Trail and Hike and Bike Trail is identified in the plan as multi-use connectors. The NPS identifies four multi-use connectors between these two regional trails. Loops between these two primary trails are created through the proposed multi-use connector trails and existing trails. In its implementation, the Park will introduce route options for visitors and various visitor experiences.

**Concern Statement:** The Preferred Alternative reduces neighborhood connector trails that will limit opportunities for residents of adjacent neighborhoods to the Park to have less non-motorized options for access to Park trails.

**Response:** The Trail Plan does not eliminate neighborhood connectors and actually increases opportunities for neighborhood connectors through the increase of multi-use connectors, improvements of roads entering the park for short-distance bicycle access and three neighborhood connector hiking trails as described on p. 78 of the Plan. Two of the proposed neighborhood connectors are located on Cleveland Metroparks and Metroparks, Serving Summit County lands. Those entities will determine the implementation of these proposed neighborhood connectors on their lands.

**Concern Statement:** Create connections to adjacent Metroparks and make them a high priority.

**Response:** The Trail Plan identifies connections to both Metroparks trail systems to assist in creating a wider trail network and continue to build the cooperative partnerships between both Metroparks and NPS. Prioritization of these connections will be part of the implementation strategy development of the Trail Plan.

**Concern Statement:** The Plan does not include enough long-distance trails and instead adds more short distance trails thereby diminishing visitor experiences.

**Response:** Because we provide three long-distance trails currently, (Towpath Trail, Buckeye Trail, Valley Bridle Trail), our design approach for expanding long-distance trails within the Park was to not just create new long-distance trails but instead to focus on connecting existing trails systems to create new long-distance trail opportunities. This approach meets the Trail Plan goal to minimize the footprint of the trail system in the Park. The long-distance expansion includes connections in the southern portion of the Park between the Towpath near Howe Meadow and Plateau-Oak Hill System and the introduction of the South Carriage and Five Falls trails for hiking creating linkages to the Towpath and other Park features north and south. It is our understanding that park visitors seek a variety of experiences that includes both short and long distance experiences.

**Concern Statement:** The preservation of the Original Boy Scout Trail should occur.

**Response:** We agree and have continued to work in partnership with the Great Trail Council Boy Scouts to provide signage markers along the trails within NPS that follow the original Boy Scout trail.

**Concern Statement:** Increasing mountain bike trail miles over 20 miles will increase the opportunities to make the Park a destination, increase visitors, and benefit the local economy.

**Response:** The NPS intent for the Trail Plan is not to increase visitation, but to provide valuable visitor experience to a variety of trail users. While 20 miles of off-road bike trails may expand opportunities for the local economy and increase the Park as a mountain bike destination, the Park intent is to provide a quality off-road bike trail experience, with the necessary mileage to meet the variety of goals set forth for the Plan. Page 139 of the Trail Plan outlines some of the information collected related to distance traveled to use a trail and the distance of the trail the user travels to enjoy.

**Concern Statement:** Increase access for the public to view the beauty of the Cuyahoga River on foot.

**Response:** We believe the Preferred Alternative provides for increased access to the Cuyahoga River on foot for viewing the river. The Cuyahoga River is the centerpiece of the Park and the NPS agrees access to the river is important. Hiking-only trails that provide access to the river include the CVC Boardwalk Trail, Hunt Farm Trail and the Ira River Trail. Additionally, the Park will introduce paddle launch sites and riverside campsites to explore the river through a variety of outdoor recreation experiences.

**Concern Statement:** The Buckeye Trail is a state-wide recognized trail system and the segment between Boston Mills Road and Station Road provide a unique visitor experience. This experience should be preserved. Introducing new uses on the trail would adversely affect this value.



**Response:** The Park will retain the segment of the Buckeye Trail between Boston Mills Road and Station Road for future off-road bicycle use with conditions as stated as part of the Preferred Alternative. Conditions under which implementation could occur upon evaluation of conditions described on p. 78 of the Plan. The Park will continue to work in full cooperation with the trail stakeholders groups in partnership with the Ohio Trails Partnership throughout the planning and design process for all trails within CVNP.

**Concern Statement:** Comments were received supporting the use of the Buckeye Trail for mountain bike use citing high visitor experience value for that particular use.

**Response:** The Park will evaluate the use of the Buckeye Trail between Boston Mills Road and Station Road for off-road bicycle use upon actions described in p. 78 of the Plan.

### **Equestrian Trail Design**

**Concern Statement:** An equestrian trail system must consider the length due to the riding speed of an equestrian trail rider, therefore requiring more trail miles than hiking trails. Typically equestrian trail rides have the duration of 1 to 5 hours at a rate of 3-4 miles per hour. If the removal of equestrian trail miles proposed in the Trail Plan occurs, new bridle trails will need to be considered to meet the demand for equestrian trail use.

**Response:** The information provided in Chapter 3, Sections 3.6.3 and 3.6.4 outlines the estimated trail use by the variety of trail user groups and the network of trails available beyond CVNP boundaries for each use. Based upon local, state and national data, equestrian use is lower than other trail uses. The rate of travel for trail users of 3-4 miles per hour for 1 to 5 five hours is also typical of an active hiker, which is typically the most frequent user group on trail systems. The Park utilized the available data to establish the proposed trails and their uses. The Park will continue to evaluate and monitor trails to consider the use of trails and the needs of trail user groups.

**Concern Statement:** Clarification of equestrian trail miles defined as new or rerouted in Actions Common to All Alternatives is needed.

**Response:** The Plan has been revised for the Perkins/Riding Run reroutes as Common to All Action Alternatives since they are included in all Action Alternatives (p.53). The trail areas identified are conceptual. Specific trail miles for rerouting and/or removal will need to be field evaluated. The Perkins and Riding Run reroute trails may not be the same amount of trail miles as removed, due to new alignments, therefore, there may not be a no-net change in trail miles for these trails. The proposed reroutes for equestrian trails will remain in the Plan as proposed new trails. Removal of trails does not necessarily require replacement of reroutes, hence, removal and reroute are two separate actions of the proposed alternatives.

**Concern Statement:** The Plan is unclear on the design of proposed equestrian trails and the use of a loop system.

**Response:** The Trail Plan is conceptually identifying general areas for trails and their designated uses. Layout and design of trails, including the loop systems, will be further developed during implementation of the Trail Plan for each trail element through the utilization of the Sustainable Trail Guidelines and any

additional best practices for equestrian trail design. The Park will work with user groups and trail design professionals to ensure a trail is designed to provide a desirable visitor experience while protecting park resources.

**Concern Statement:** The proposed mileage for mountain bike trails within the Park is not sufficient. Equestrians have more mileage and fewer users. Mountain bike user groups should get more miles than equestrian users.

**Response:** The Park utilized the information provided during public scoping and evaluated all trail uses as part of the impact analysis of Chapter 4 of the FEIS in conjunction with the goals of the Trail Plan. The preferred alternative limits increase of new trail miles for equestrian use and consolidates some equestrian trails with a compatible use, hiking. Trail mileage for off-road bicycle use was developed as part of the overall visitor experience for all visitors to the Park and the land available for a well-designed off-road, single-track trail for bicycle use.

### **Off-Road Bicycle Trail Design**

**Concern Statement:** There are four main concerns regarding the design of the proposed mountain bike trail system in the Trail Plan's Preferred Alternative, Alternative 5; length, layout, location and connections. These concerns will diminish visitor use experience for mountain bike use.

**Response:** The layout of off-road, single track bicycle trails drawn on the Alternatives maps are intended as conceptual, and only identify general areas for off-road bike trails. Detailed site evaluation, layout and design will be conducted for the designated area, in accordance with the recommendations of the Sustainable Trail Guidelines, NPS Sustainable Guidelines and guidance of the International Mountain Bike Association (IMBA). Expertise from IMBA and local and regional mountain bike users and trail designers will be utilized as part of the implementation process. Best design practices for off-road bike trails with consideration of present site conditions will be implemented to create a valuable visitor experience while minimizing adverse impacts on park resources.

The Trail Planning process evaluated numerous options for off-road bike trails within the Park during public scoping. Due to a variety of issues identified and evaluated during the impact analysis including, property ownership, other trail uses, natural and cultural park resources, current park use trends, and visitor use conflicts, a 10-mile trail designated specifically for off-road bike use with availability for use by hikers and runners, in the location proposed was included in the Preferred Alternative. The proposed location of the off-road bike trail within the Preferred Alternative was part of the recommendations submitted by Cleveland Area Mountain Bike Association (CAMBA) during public scoping. The location of the trail will also provide the opportunity to provide a physical link, via the Hike and Bike trail, to other emerging off-road bike trails in both Metroparks systems to establish a regional off-road bike trail system that is larger than what NPS can provide while still meeting its mission.

**Concern Statement:** The proposed mountain bike in the Preferred Alternative is located on the Krejci Dump site. Because of its environmental conditions, it is not a good location for a mountain bike trail and limit visitor experience due to poor conditions to implement a well-designed system.

**Response:** Placing trails near the former Krejci dump site on Hines Hill Road in Boston Township will not have an adverse impact on the off-road bike experience or public health and safety. The site was recently (August 2012) declared clean of toxins and is in the process of being restored. There is minimal

siting of new trail on the site. The remote location of the trail will assist the Park in meeting the goals of the Trail Plan associated with visitor experience for all park users.

### **Visitor Use Conflicts**

**Concern Statement:** Some commenters indicated that the sharing of trails between user groups will increase visitor conflicts and diminish visitor experiences. Alternatively, comments were received indicating the desire for more shared trails among trail user groups and that visitor conflicts were overblown in the document.

**Response:** Public scoping provided a variety of ideas regarding trail sharing among different user groups. The Park utilized data and research available on a variety of trail systems to evaluate visitor experience of trail uses, as outlined in Chapter 4. The information indicated that some trail uses are more compatible with each other than others. The Preferred Alternative provides opportunities for increased trail sharing among compatible trail uses and limits sharing between less compatible trail user groups. The sharing of trails among compatible user groups will assist the Park in meeting goals of the Trail Plan to minimize the footprint of trails within the Park to protect its resources.

**Concern Statement:** Equestrian and mountain bike trails cross each other and will cause visitor safety concerns.

**Response:** The Trail Plan presents a separate trail system between the equestrian and off-road bike trail uses. There is a limited instance where off-road bike trails and equestrian trails may cross paths, near the Dugway Trail and its connection with the Akron-Peninsula Connector Trail. The use on Valley Bridle Trail is projected to be low for equestrian users and visitor use conflict will therefore have minimal adverse impacts.

### **Socioeconomic**

**Concern Statement:** Some trails are close to private residential or institutional areas and that may impact private properties, particularly near Mudcatcher Trail and the Highland Road Connector Trail.

**Response:** The Park evaluated each trail element and its proximity to private property in addition to other adverse and beneficial impacts that trails may have on the Park and resources outside of the Park. For trail elements identified in the preferred alternative with adjacent private property concerns, we will conduct additional public outreach to adjacent property owners in coordination with the local jurisdictions as part of additional planning described on pp. 76 of the FEIS. This coordination will help determine if the trail can be designed and implemented without adverse impacts to adjacent private property owners. If this planning effort concludes that a trail cannot be realized without undesirable impacts, the trail element will not be implemented.

**Concern Statement:** The Park should not be concerned about business opportunities available in regards to the Alternatives of the Trail Plan.

**Response:** The effects of trails and trail users on local businesses were identified as an issue during public scoping. The Park's location within multiple jurisdictions clearly indicates a potential for impacts and therefore this topic was considered in the analysis.

## **Park Operations**

**Concern Statement:** Inadequate mountain bike trails do little to reduce operations, law enforcement problems or user conflict. This is particularly true in the South Carriage Trail areas where mountain bike use has been an ongoing activity prior to the parks creation. Because of that, and it's location near a large user base, this activity is likely to continue. Any resource impacts would be greatly offset by a reduction in operations and law enforcement impacts. Since the adverse effects have already been considered as minimal in option 3B it is highly recommended area be included in whatever plan is eventually selected.

**Response:** The Trail Plan considered a variety of issues for proposed off-road bike trails within the Park as outlined in Chapter 4, Environmental Consequences of the Plan. Previous unauthorized use as a substantial reason to permit use was not considered a viable justification to consider as part of the Plan. Issues considered included access, adjacent private property, trail mileage available for a desired off-road bike trail experience and park resource conditions.

**Concern Statement:** Designation of a stewardship coordinator and groups and individuals to enhance the use of volunteers for the implementation of the Trail Plan is recommended.

**Response:** We agree that staffing to coordinate and engage groups and individuals for the implementation of the Trail Plan is essential. This action is identified on p. 50 of the FEIS, Use of Volunteers.

**Concern Statement:** Please provide clarification on designation of hiking anywhere in the park and the guidance to stay on established trails.

**Response:** Park policy generally permits open use of its lands by the public (except where closures have been designated by the Superintendent). In keeping with the goals of the Trail Plan and the mission of the NPS and Park, to minimize human impact to park resources, the Park recommends the use of designated park trails for visitor use.

**Concern Statement:** Mountain bike riding should be available during the night to disperse use and expand visitor experience opportunities.

**Response:** Determination of off-road bike trail use hours will be part of the implementation of the Trail Plan.

**Concern Statement:** To enhance the visitor experience of hikers, the park should consider alternative use days on mountain bike trails that would include designated hike-only days to hike mountain bike trails without bikers.

**Response:** Hiking is permitted on all existing and proposed trails within the Park. Off-road bike use will be permitted on a particular trail system within the Park, therefore, less mileage for off-road bike use will be available than to hikers. Since hikers have numerous options for trail use within the park and off-road bike use will be limited in designated areas, further restrictions of off-road bike use is unlikely due to these conditions. However, operations and regulations for trail use on new use trails will be fully determined during implementation of the Trail Plan.



## Coordination & Consultation

**Concern Statement:** One of the equestrian stakeholder groups involved in the public scoping of the Plan was not identified in Section B of Appendix A.

**Response:** We have revised Section B of Appendix A to include all equestrian stakeholder groups that were involved in the public scoping of the Plan.

**Concern Statement:** The comment period was not widely known. More direct mailings or publicity on its availability would provide more time to review and comment on the Plan.

**Response:** We believe we were diligent in letting the public know this document was available for review. We followed all federal requirements for public notice and involvement of the public throughout the two-year planning process. A notice of the Draft EIS availability for public review and comment was provided through the two major regional newspapers (Cleveland Plain Dealer and Akron Beacon Journal) and also carried in several other local newspapers. Additionally a notice was published in the Federal Register, letters were sent to all local jurisdictions, agencies and organizations, and emails were sent to over 250 individual stakeholders and interested parties. All notices included an invitation to three public meetings during the 60-day comment period.