

Community Access Draft Plan

Comment Summary Report

Cuyahoga Valley National Park
November 2022

Executive Summary

The National Park Service (NPS) is developing a Community Access Plan (plan) for Cuyahoga Valley National Park (park) to identify actions to improve visitor opportunities and address challenges related to visiting the park. The plan includes strategies that protect and preserve key resources that contribute to the purpose and significance of this national park.

The plan examines options to:

- Provide new and more relevant guidance to manage changing park visitation
- Provide a range of recreational opportunities in a variety of settings to reduce congestion and user conflicts
- Improve wayfinding, circulation, and visitor information
- Address impacts on natural and cultural resources
- Intentionally plan for river access
- Address changing demographics and audience needs

The park released a newsletter and draft plan in July 2022, providing background on the plan, its purpose, and a summary of management actions. The newsletter and plan were published on the NPS Planning, Environment, and Public Comment (PEPC) website at:

<https://parkplanning.nps.gov/document.cfm?parkID=121&projectID=92300&documentID=121708>. The plan provided more detailed information on management strategies and actions under consideration. The newsletter solicited comments and participation from the public pertaining to the plan.

With the release of the newsletter and plan, NPS held a public comment period from July 18, 2022, to September 16, 2022, and held five public meetings during this period. Two meetings were held virtually, and three were hosted in person. One in-person meeting was held in the park, one was held in Cleveland, and the third was held in Akron. Dates, locations, and times of the public meetings are provided below:

- Virtual Meeting
 - Monday, July 18
 - 7:00 pm–8:00 pm EDT
- Virtual Meeting
 - Tuesday, July 19
 - 11:00 am–12:00 pm EDT
- Cleveland, Ohio

- Lakefront Reservation, Upper Edgewater Shelter – East Half Upper Edgewater Drive
- Tuesday, July 19
- 4:00 pm–6:00 pm EDT
- Peninsula, Ohio (in the park)
 - Cuyahoga Valley National Park Happy Days Lodge, 500 West Streetsboro Road
 - Wednesday, July 20
 - 2:00 pm–7:00 pm EDT
- Akron, Ohio
 - Akron-Summit Public Library, Main Branch, Public meeting room, 60 South High Street
 - Thursday, July 21
 - 4:00 pm–6:00 pm EDT

Any comments received (entered into PEPC by the public, emails sent to park staff, and written comments mailed to the park headquarters) were considered and included in the overall project record. A total of 174 pieces of correspondence were received during the public comment period. This Comment Summary Report summarizes the concerns expressed during the public comment period.

Recommendations

The public provided suggestions on management strategies and actions to inform the development of the plan. The top categories identified by commenters were related to trail maintenance and connectivity, the Towpath Trail, coordination with partners and communities, parking, new management actions, and camping opportunities. Commenters also identified additional issues of concern. Recommendations are ordered based on the most common themes or issues that arose, and include, but are not limited to, the following:

1. Research health, safety, and visitor experience issues associated with installing chip-sealed asphalt on the Towpath Trail and determine if the benefits outweigh the detriments.
2. Provide lodging options in addition to camping. Options could include acquiring adjacent land or using existing buildings on park land to create long-term rental buildings or constructing a lodge-type building to provide visitors a place to stay overnight or for extended periods.
3. Coordinate with local towns, cities, farms, schools, and other public or private organizations when determining and implementing future management strategies. The partnerships could include working with local Metroparks to increase trail connectivity and protect resources or working with an organization such as Blossom Music Center to increase and manage camping opportunities.
4. Create new trail connections for more loop trails, easy access to the park, improved visitor experience, and enhanced equitable and inclusive access.

5. Provide more camping opportunities throughout the park, including full or power hook-ups for recreational vehicle (RV) or van camping. Suggested locations for camping included the former location of the Brandywine Golf Course (currently referred to as the Peninsula Land Property), the Coliseum site, Robinson Field, and Howe Meadow.
6. Make the park more accessible to the public, particularly city residents and underserved communities, by working with regional partners to expand transit connections and frequency of services. Increase use of public transportation through the Cuyahoga Valley Scenic Railroad (CVSR) by adding more stops and extending service into Cleveland.
7. Expand amenities at trailheads, including water fountains, restrooms, picnic tables, shade structures, water for horses, bike racks, and benches.
8. Improve safety for cyclists and pedestrians by separating bike and car parking and improving road quality, parking, and sidewalks. Improve cyclist and pedestrian safety by prohibiting electric bikes (e-bikes), confining bicycles to roadways or bicycle-only trails, or posting and enforcing speed limit signs.
9. Install new safety features in the park, including signs that provide ranger information, emergency blue-light phones, pedestrian-activated flashing lights on popular road crossings, and marked crosswalks.
10. Provide new river access points in popular locations or near train stops. Prioritize safety and ease of river access by providing carts, boat racks, and some gravel or paved access points.
11. Consider environmental concerns when implementing strategies such as gravel bar camping, which may discourage land-nesting birds or treating the Towpath Trail with chip-sealed asphalt, which may increase runoff into the river.
12. Provide more designated equestrian parking, especially at bridle trails, equestrian camping at Robinson Field, and more trails or improvements to existing trails for horses.
13. Provide new parking areas to better serve visitor needs and keep parking areas currently slotted for removal in the draft plan.
14. Install additional signs and maps to the park so visitors can easily find restrooms; advertise less-known areas of the park; provide directions to amenities and trails; communicate the rules of the park; provide educational information; and advise visitors about trail difficulty.
15. Designate more trails for mountain and gravel biking and keep old roads such as Stanford Road, Akron Peninsula Road, and Everett Road open for biking.
16. Expand the volunteer program by giving volunteers a more formal role and reaching out to trail running and mountain biking communities for volunteers.

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Comment Analysis

Correspondence Received

The following tables were produced by the National Park Service (NPS) Planning, Environment, and Public Comment (PEPC) database and provide information about the numbers and types of correspondence received, organized by code and by various demographics. Data on the number of correspondences received by correspondence type, organization type, state, and country are presented.

Also included below is a table detailing the number of comments identified by code. A total of 700 individual comments were derived from the 175 correspondences received on the newsletter and draft plan.

TABLE 1. CORRESPONDENCE DISTRIBUTION BY CORRESPONDENCE TYPE

Correspondence Type	Correspondences
Web Form	158
Park Form	12
Other	3
Email	2

TABLE 2. CORRESPONDENCE DISTRIBUTION BY ORGANIZATION TYPE

Organization Type	Correspondences
Unaffiliated Individual	157
Recreational Groups	6
Conservation/Preservation	4
Civic Groups	3
University/Professional Society	2
Business	1
NPS Employee	1
Town or City Government	1

TABLE 3. CORRESPONDENCE DISTRIBUTION BY STATE

State	Correspondences
Ohio	166
Kentucky	2
Colorado	2
Pennsylvania	1
Delaware	1
Arizona	1
Unidentified	1
Michigan	1

TABLE 4. CORRESPONDENCE DISTRIBUTION BY COUNTRY

Country	Correspondences
USA	175

TABLE 5. COMMENT DISTRIBUTION BY CODE

Code	Comments	Percentage
Trails	79	11.3%
Partners and Communities	73	10.4%
Towpath Trail	62	8.8%
Parking	41	5.9%
Suggested Management Strategies and Actions	35	5.0%
Camping Opportunities	35	5.0%
Wayfinding	33	4.7%
General Support	32	4.6%
Commercial Services and Concessions	30	4.3%
Amenities	30	4.3%
Natural Resources	25	3.6%
Visitor and Park Staff Safety	25	3.6%
Equestrian Use	24	3.4%
River Access	24	3.4%
Equitable and Inclusive Access	23	3.3%
Plan Scope and Goals	21	3.0%
Out of Scope	16	2.3%

Code	Comments	Percentage
Bike Use	15	2.1%
References, Edits, Additional Information, Data	14	2.0%
NPS Staffing / Volunteers	11	1.6%
Cultural Resources	10	1.4%
Proposed Management Zones	9	1.3%
General Oppose	7	1.0%
Interpretation and Education Strategies	7	1.0%
Duplicate Comment	6	0.8%
Management Actions Removed from Further Consideration	6	0.9%
Howe Meadow	4	0.6%
Visitor Use and Experience	3	0.4%
TOTAL	700	100%

Definition of Terms

Correspondence: A correspondence is the entire document received from a commenter and includes letters, emails, comments entered directly into the PEPC database, and any other written comments provided either at the public meetings or in person at the park.

Comment: A comment is a portion of text within a correspondence that addresses a single subject such as “Natural Resources.” The comment could also question the accuracy of the information provided in the newsletter and draft plan, question the adequacy of any background information, or present issues other than those presented in the newsletter and draft plan.

Code: A code is a grouping centered on a common subject, such as “Camping Opportunities.” Codes are developed during the public comment process and are used to track major subjects found in the newsletter and draft plan. In cases where no comments are received on an issue, the code is not identified or discussed in this report.

Comment Summary: A grouping that is centered on a common subject. Comment summaries combine similar comments.

Comment Summaries

Prompting Questions and Comment Summary Structure

Three questions were posed to commenters to receive targeted feedback on the Community Access Plan.

1. What are your suggestions to refine these actions?
2. What should we be considering to finalize and implement these actions?
3. Other thoughts you'd like to share with the project team?

Within the comment summary that follows, major concepts and unique perspectives are represented for the comments received during the comment period.

Trails

Trail Connection Requests

Commenters requested various trail connections to provide more loop trails, ease access around the park, and create connections that would improve visitor experience in the park.

Commenters further requested that the plan encourage coordination with organizations within the park's footprint to leverage connections and provide more extensive contiguous trail opportunities. The most commonly requested trail connections commenters noted were (1) the Old Akron-Peninsula Road and Stanford Road, (2) to the Village of Peninsula, and (3) to Buckeye Trail. Additionally, several commenters requested a connection across Cuyahoga River from Old Par 3 at the former Brandywine Golf Course (Peninsula Land Property) to the Towpath Trail and a trail loop between Columbia and Snowville Roads. Additional suggested trail connections included:

- More trails north of State Route 303
- A backpacking loop similar to Zaleski State Forest backpacking loop
- Trails to and from the Boston Mill Visitor Center
- Trail from Peninsula to Virginia Kendall
- Access to Buttermilk Falls via a trail at the visitor center
- Improved Tinker's Creek Road dead end path going west to the river from Towpath Trail
- Improved trail access in the area of Red Lock, such as a trail from Red Lock to the Jaite Paper Mill
- A multiuse trail from Indigo Lake to Howe Meadow
- Trail connecting Camp Mueller to the park
- More entrance connections between the park and the Ohio & Erie National Heritage Corridor, Brecksville, Hampton Hill, O'Neil's Woods, and Cascade Valley Park
- Oak Hill road near Covered Bridge reestablished as a valuable hiking and biking connection between the Covered Bridge and Hale Farm
- Trail on the west side of the railroad tracks to connect the Lock 29 parking lot and trailhead to Main Street/Route 303
- Multiuse trail that reconnects Oak Hill Road south of the covered bridge

One commenter noted that Sagamore Hills Township has changed the plans for a connector from the Towpath Trail to the Hike & Bike Trail and that the Sagamore Connector Trail is no longer being considered.

New Trail Suggestions

Commenters requested additional trails and other improvements at the park, including:

- Creating a safe walking trail along the road to Blue Hen Falls
- Facilitating the development of Veteran's Trail
- Opening the maintenance trail for Buckeye Trail to the public for dark sky viewing over the Columbia Field
- Lengthening the "0.25 mile path with platform" at Coliseum to improve bird watching
- Rerouting upper portions of Perkins Trail off flat, eroding terrain to the eastern hillside facing the Cuyahoga River
- Keeping Valley Bridle Trail permanently rerouted
- Creating a new Bridle Trail in the northern natural zone with the existing Canal Exploration Center as a trailhead
- Considering a future trail expansion to the west of Lamb's Loop or north of Hines Hill Road
- Repurposing the western-most section of Riding Run down to Wheatley Road as a paved, multipurpose trail
- Reopening the recently closed railroad tracks to pedestrians
- Considering new trails in less visited area of the park, such as the Stanford/Brandywine Creek area or near the wetlands south of Station Road
- Restoring Oak Hill Road by the covered bridge

Restoration or Formalization of Visitor-Created Trails

One commenter suggested the park define visitor-created trails that are older and serve as valuable trail connectors as native trails or legacy trails. Another commenter noted that the park should minimize closure time of trails they intend to formalize, or visitors may create more trails. Another commenter questioned how the park would accomplish this objective.

Trail Maintenance Needs

Commenters requested additional trail maintenance on existing trails. Commenters specifically mentioned invasive species control, tree planting, poison ivy removal, and increased trail durability during the wet season. One commenter suggested the park use Google Docs or a similar program to crowdsource trail conditions for visitors to report trail issues.

Towpath Trail

Chip-Sealed Asphalt and Surface Types

Some commenters supported the use of chip-sealed asphalt as a surface treatment to eliminate issues of frozen surfaces, ruts, and mud in winter and spring, and to provide a smoother surface for cyclists.

Other commenters stated opposition to the use of chip-sealed asphalt as a surface treatment. These commenters suggested this management action would affect visitor health and safety by encouraging further motorized use and increasing the chance of a collision. They suggested that a paved surface may also cause increased pressure and damage to joints for runners and walkers. Commenters further suggested that paving the towpath could raise the temperature on the trail from heat radiating off the pavement. One commenter noted that tree roots may eventually spread under the paved trail, break the surface, and create undesirable and unsafe cracks or bumps. Commenters further noted that paving the Towpath Trail could detract from visitor experience because it would remove a natural element from the park experience and boost the trail's popularity when it is already overly crowded. Other commenters stated that there are other paved trails in the area for visitors who want that type of experience. One commenter noted that visitors would be unhappy if the Towpath Trail were closed for construction for long periods. One commenter requested the park provide an explanation for suggesting the chip-sealed asphalt. Another commenter recommended the park retain the crushed limestone surface and requested that any major changes in surface treatment be discussed with adjacent management entities. One commenter suggested the park only pave access points, areas that wash out frequently, and trails accessible to those with disabilities. One commenter noted that the existing trail is hazardous for cyclists, and asphalt fissures damage bicycles. Another commenter noted that frequent transitions between surface types (i.e., pavement to/from packed gravel) is dangerous to cyclists due to bumps and dramatic changes in traction on the path and recommended the park choose one surface material for the entire length of the Towpath Trail to reduce hazardous conditions.

Several commenters discussed the dangers of chip-sealed asphalt for bicyclists. One commenter noted that chip-sealed asphalt sheds gravel, which can be dangerous for cyclists; the commenter suggested the use of regular asphalt instead because it has a longer lifespan, does not shed gravel, and sheds water more readily, all of which create a safer experience for cyclists. Another commenter noted that chip-sealed asphalt is not pleasant to ride on and can cause flat tires.

Towpath Trail Accessibility and Maintenance

Commenters were supportive of paving and widening the Towpath Trail to allow for more equitable access. Furthermore, commenters suggested widening the trail or creating dedicated walking and cycling paths would improve safety. One commenter requested that the park add paved overlooks along the Towpath Trail to enhance the experience for visitors with disabilities. Another commenter requested the trail remain a standard width for the entirety of its length.

One commenter stated that the Towpath Trail needs a separate plan to keep it well-maintained.

Amenities for the Towpath Trail

Commenters requested specific amenities along the Towpath Trail, including more restrooms and benches. One commenter requested more lighting along the trail, while another commenter suggested the park provide shelter facilities every 3 miles along the trail to provide refuge in storms. One commenter suggested adding restaurants in the area.

Partners and Communities

Coordination Suggestions

Commenters recommended NPS coordinate with local towns, cities, municipalities, farms, organizations (e.g., nonprofits, recreational groups, businesses), schools, and libraries when developing and implementing the management strategies proposed in the plan. Organizations that specifically requested partnership or consultation with the park included:

- Cleveland Metro Parks – Future resource reports, trail connectivity planning
- Summit Metro Parks (SMT) – Input on natural and cultural park resources
- Ohio’s Horseman’s Council – Equestrian trail planning
- Bike Portage – Trail connectivity suggestions

Several organizations suggested that other organizations be included:

- Purplebrown Farmstead & Farm Store – Suggested the park partner with local farmers (e.g., Szalay’s Farm, Hale Farm, and other local farms) to increase agricultural land within the park
- Bike Portage – Suggested the park partner with Ohio to Erie Trail regarding long-distance travelers on the Towpath Trail
- Conservancy – Suggested the park partner with Blossom Music Center for group camping management opportunities

Additional organizations that commented included:

- Town of Akron
- Brooklyn Centre District

Additional organizations mentioned during the comment period included:

- Villages of Peninsula and Richfield
- Town of Cuyahoga Falls
- City of Cleveland and surrounding communities
- Peninsula Museum
- Stark Area Regional Transit Authority
- Midwest Railway Preservation Society
- Greater Cleveland Regional Transit Authority
- Vail Resorts
- Facebook groups
- Cleveland Hopkins and Akron Canton Airports
- Ohio to Erie Canalway Coalition
- Linking Employment, Abilities and Potential
- Northeast Ohio Regional Sewer District
- Central Weights and Measures Association
- Water Trail

- Canalway Partners
- TASCforce (Trail Advocates of Summit County)
- International Dark Sky Association
- Ohio Environmental Council
- CVSR
- Ohio Department of Natural Resources
- Native American tribes

In addition to the specific requests for action above, commenters suggested NPS cooperate with these organizations to accomplish the following:

- Reduce encroaching development around the park
- Coordinate river cleaning efforts
- Host events, advertise the park
- Provide reliable access to and from the park through buses or railroad
- Enhance visitor engagement with local farms
- Enhance trail connectivity through properties adjacent to the park
- Create new trails with the help of volunteers
- Coordinate recreational tours
- Create and manage camping areas
- Determine any funding opportunities
- Work to preserve dark night skies
- Enhance education and interpretation
- Collaborate with other projects and plans outside the park (i.e., Crooked River Cooperative Weed Management Area and Merriman Valley Project).

Community Served

One commenter requested the park provide a clear distinction between park visitors and park users as tourists and locals. The commenter requested the park focus on benefits to park users and locals rather than park visitors and tourists. Another commenter requested the opposite, stating the plan is currently focused on surrounding communities but needs to focus on visitor needs from everywhere.

Additional Public Involvement

Commenters requested additional public involvement activities, including public information sessions. One commenter questioned if the public would be allowed to comment in the future if usage or needs changed.

Coordination with Summit Metro Parks

One commenter expressed concern that many of the proposed changes and goals had been determined without consultation with SMP. The commenter requested consultation with SMP regarding any changes that take place on or near their property. Specific actions and areas where the commenter requested collaboration with SMP included:

- Columbia Sensitive Resource Area trail and picnic area restoration
- Connector from the Everett Covered Bridge to Hale Farm
- Changes to the Everett Covered Bridge and the Everett Cultural Area
- Parts of the Towpath Trail that SMP manages
- Promotion of Deep Lock Quarry as alternative parking access
- Interpretation of precontact sites on SMP property, including interpretation of the Everett Knoll Complex site
- Evaluation of connections, any changes in signage, and access to the Bike & Hike Trail
- Development of a cultural landscape plan for Virginia Kendall
- Development of apps, online maps, and other public resources relating to natural and cultural resources

Parking

Existing Parking Improvements

Commenters suggested specific improvements to existing parking areas, including more parking spaces and regular plowing in the winter at the East Rim trailhead. Other commenters asked for additional parking spaces at the Terra Vista parking area. Commenters supported adding more spaces in the lot at Everett, including spaces for RVs and trailers, and suggested redesigning the lot to accommodate pull-through spaces for RVs and trailers.

Suggestions for New or Expanded Parking Areas

Commenters recommended establishing new parking areas to better serve visitor needs. Suggested areas for new parking included:

- A small lot with access to Akron-Peninsula Road
- A lot near Stone Road and Riverview Road for access to Hemlock Creek Trail
- A lot with picnicking at Old Par 3 at the former Brandywine Golf Course (Peninsula Land Property)
- A lot with closer access to the park's waterfalls (in addition to the proposed lot at Blue Hen Falls)
- Smaller pull-offs for access to Wetmore Trail and Everett Covered Bridge
- Informal parking areas at Riverview and Bath Roads in the Cuyahoga Valley Scenic Railroad (CVSR) gravel lot

- Restored parking next to the Boston Store to create a circular traffic pattern to ease congestion

One commenter suggested a lot off Hines Hill instead of the proposed new lot at Stanford Trail and noted that the park could add a trail linking the new lot to the conference center and could add restrooms at the old house on the hill. Another commenter suggested that the park use the Boston Mills Ski Resort parking in the spring, summer, and fall. Some commenters also requested more on-street parking with pull-offs. Commenters also urged the park to avoid creating parking to meet the demand on the busiest days, noting that the lots would be empty for most of the year.

Removal of Parking Lots

Some commenters encouraged the park to remove or limit parking to improve the natural landscape, decrease stormwater runoff, and avoid impacts to sensitive cultural sites. One commenter noted that Little Meadow Parking Lot could be removed, but a connector trail should be built back to the Pine Hollow Lot. Commenters suggested removing the gravel lot on West Bath Road and directing people to Botzum, where features like camping spots, river access, and food trucks could be added. Commenters suggested repurposing lots at Botzum, Crowfoot Gully, and Little Meadow as foundations for picnic shelters.

Other commenters suggested keeping some of the parking lots slated for removal in the plan. Commenters requested that the park not remove or reduce the size of lots at Quick Road, Kendall Hills, Little Meadow, Botzum, and Crowfoot Gully. One commenter asked why the park closed the Boston Store parking lot, noting that it provided important overflow parking for the Boston Mill Visitor Center. Some commenters noted that as the popularity of the park grows (as a result of the beneficial actions mentioned in the plan), more parking would be needed. One commenter was against making several smaller parking lots and worried that three lots could result in overcrowding at less popular sites.

Requests to Manage Parking

Commenters were in favor of repurposing parking lots and charging for parking. One commenter recommended restricting the size of the Everett parking lot to prevent overuse. Another commenter noted that increased parking around Blue Hen Falls could lead to overuse of SMP's Columbia Run Conservation Area and suggested that existing parking spaces be converted to comply with the Americans for Disabilities Act (ADA) and for use by visitors with limited mobility. Charging for parking on high traffic days was proposed to generate revenue for the park and better disperse visitors throughout the park.

Suggested Management Strategies and Actions

Property Acquisition and Use

Commenters suggested NPS acquire specific pieces of land or properties for the reasons outlined below. Suggested acquisitions included:

- Neighboring land to prevent further development in and around the park
- West Creek Confluence property to facilitate trail/bike lane connections to Towpath Trail
- Existing structures/homes on the property to create long-term rentals
- The land that was once the Brandy Brook Farm to provide a location of historical value to park visitors and a hiking trail loop along the creek
- Old Haydite Mine to create an outdoor recreation hub similar to Quarry Park in Minnesota

Several commenters suggested the park use existing structures or homes on park property as rental facilities for visitors. One commenter suggested the park allow individuals to lease that type of property to help provide the upkeep and use it for community events.

Lodging

Commenters requested the creation of a new “national park lodge” or lodging area in the park. Commenters suggested the Jaite Paper Mill site, the former Brandywine Golf Course (Peninsula Land Property), Peninsula, Merriman Valley, and Independence as potential locations for the lodge, while one commenter suggested using the historic house and barn at 3491 Akron Peninsula Road. If constructed at the former golf course property, one commenter suggested it would be close enough to the village to provide additional services such as food, bicycles, shops, and atmosphere. If constructed at Jaite Paper Mill, commenters suggested including the construction of a ski lift to Brandywine Ski Resort, an indoor/outdoor transition area, and lodge-sponsored events such as dances, weddings, parties, and meetings. One commenter further suggested the park provide equipment rental stores as well as a barn and corral for horses near the lodge.

New Forms of Recreation

Commenters requested accommodations for new types of recreation in the park, including golf, disc golf, BMX biking, tobogganing, and cross-country skiing. To accommodate these activities, commenters suggested the park use the former Brandywine Golf Course (Peninsula Land Property) for golf or disc golf, create a BMX pump track, build toboggan shoots for tobogganing, and groom ski tracks on Towpath Trail during winter for cross-country skiing. One commenter suggested the park use the skiing areas in spring, summer, and fall for biking and running purposes.

Additionally, commenters requested new forms of recreation for the river, including constructing whitewater features, free-style kayaking features for surfing, and designating shallow areas for children. One commenter noted that providing whitewater features in a park could increase water quality, fish population, foot traffic, and concession use. One commenter specifically suggested the low head dam at Lock 29 as a location for a free-style kayak feature for surfing.

Improvement and/or Restoration of the Canal

Commenters requested the park either improve the canal or restore it to working condition by clearing and restoring the locks to allow boats to travel along it or by using motorized canal boats in place of donkey-pulled boats. Commenters suggested that a working canal would increase public interest in the park, increase park revenue, and boost the economy in the region. One commenter asked if the park was working on the Canal Management Plan given its significance at the park.

Additionally, one commenter requested the park remove Gorge Dam to create a clear run from Upper Cuyahoga in Kent through to the mouth in Cleveland. In addition to the access this would provide, the commenter suggested this change would improve water quality and wildlife in the area.

Improved Visitor Experience

One commenter suggested the park enforce noise limits on cars and motorcycles to protect natural soundscapes and improve visitor experience. One commenter suggested that providing better separation between the viewing area and the road at the Heron Rookery would improve visitor experience. One commenter asked for the Boston Mill Visitor Center to open earlier in the morning from late spring to early fall to better serve visitors. One commenter asked if the park would consider a reclamation plan for Everett Road, noting that the existing state of the abandoned road affects visitor experience.

Education and Interpretation

Commenters requested several different forms of interpretation and education, including the use of hiking activities and river-focused programs. More specifically, commenters requested:

- Hiking sprees like those offered in SMP to educate park visitors on natural resources and encourage visits to less visited location in the park
- Targeted opportunities for young adults to promote conservation actions in day-to-day life
- Expanded programs on native plants
- Storytelling programs
- River-focused programs for students to learn about water quality testing
- Historic interpretation opportunities at Frazee House

One commenter requested the park not create any special programs.

Signage and Wayfinding

Commenters requested the park add additional signs and maps to the park to help visitors more easily find restrooms; advertise less-known areas of the park; provide directions to amenities and trails; communicate the rules of the park (i.e., fishing rules near the river and pet

expectations on trails); provide educational information; indicate distances, destinations, and the shortest route back to the trailhead; indicate trail difficulty; and advertise entry to and exit from the park on the turnpike. More specifically, commenters requested the park add quick response (QR) codes, “you are here” icons, and Global Positioning System (GPS) coordinates of important locations to the maps in the park.

One commenter suggested adding more frequent mile markers on Towpath Trail, while another commenter recommended adding more trail markers throughout the park. One commenter suggested the park create a mobile application that would provide alternatives to popular areas in the park and emphasize the importance of using the train system.

Commenters suggested the park coordinate wayfinding efforts with nearby cities, such as Akron and Cuyahoga Falls, and establish a consistent design for signs throughout the park. One commenter recommended the creation of a signage plan.

Management Zone Suggestions and Additions

Commenters requested additions or changes to management actions under the proposed management zones, which included:

- Monitor boundary for encroachments by adjacent landowners; include in all zones
- Implement short-term trail closures in wet conditions; focus closures first in the sensitive zones and natural zones
- Decommission or restore trails; focus these actions in sensitive zones first
- Provide nature-based art and play opportunities in high value zones; provide these opportunities in less popular areas to redirect visitation pressure
- Control invasive species; include control of invasive species in the sensitive zone management actions
- Maintain the Cuyahoga River Water Trail; include action in Cuyahoga River corridor zone
- Provide language about enhancing resources (i.e., appropriate culvert sizing, ditch maintenance, prescribed fire, deer management, treatment of forest pests and pathogens, revise permits and rules/regs); include actions across all zones

Commenters requested the park provide the method and rationale used to determine the extent of the proposed management zones.

Camping Opportunities

Camping Benefits and Public Approval

Commenters supported the introduction of camping to the park and noted that the park is not currently suitable for visitors traveling long distances. By adding camping, commenters felt the park would be more complete and would attract more visitors.

Types of Camping / Camping Locations

Commenters suggested various camping locations in the park, including the Coliseum site, Robinson Field, and Howe Meadow. Several commenters specifically requested the park use the Brandywine Golf Course (Peninsula Land Property) for camping purposes. Commenters also suggested different types of camping be established (e.g., primitive tent camping, walk-in and drive-up camping, group tent camping, car camping, van-life camping, and RV camping). Several commenters specifically requested the park offer full hook-up or power hook-ups for camping. One commenter disapproved of allowing gravel bar camping along the Cuyahoga River.

Partnerships for Campground Management

Commenters asked how the partnership aspect of offering diverse camping opportunities would proceed. One commenter asked if the partner would manage the campsite, while another questioned what the park envisioned for these campgrounds. One commenter suggested the park contact Countryside Farms to develop the campsite, including restrooms and parking. One commenter noted that some suggested camping locations are on SMP property and that any camping opportunities on this property would require coordination with SMP and would be under the authority of the SMP Board of Park Commissioners.

Commercial Services and Concessions

Concessions – Shops, Farmers Markets, and Food Trucks

Some commenters supported NPS providing access to local businesses and farmers market vendors to sell within the park and noted that these services would draw more visitors. One commenter proposed adding a farmers market area near the north end of the park with additional parking. Another commenter suggested leasing historic buildings to vendors to sell their goods. Some commenters were against having concessions in the park because they may detract from the natural and pastoral experience of the park or cause overcrowding issues. One commenter was in favor of thoughtful implementation of food trucks in the park.

Commercial Services – River-Related Activities

Some commenters were not in favor of providing kayak and canoe rentals because they were concerned that rentals could lead to overcrowding on the river and detract from visitor experience. Other commenters were in favor of kayak and other boat rentals, noting that they could open up recreation on the river to those who do not own boats and increase access for all. One commenter noted that boat rental and guiding companies could assist in maintaining river access points and keep the river clear. Some commenters asked that the park manage either the number of boat rental businesses or the number of kayaks and canoes allowed on the river to avoid overwhelming the park with littering, large groups or parties, and other activities that could disturb wildlife.

Commercial Services – Bicycle Rentals

Some commenters stated opposition to bike rentals for fear that bicycles would be left abandoned throughout the park. Other commenters suggested implementing a signup rental bike system to allow the park to manage bicycle traffic.

Commercial Services – Public Transit Expansion

Some commenters expressed concerns about expanding public transit in and around the park. Some commenters worried that more public transportation would lead to increased noise, traffic, and crowding. Some commenters believe it is more appropriate for transit organizations to spend resources on improving transportation, rather than the NPS. One commenter worried that extending the CVSR to Cleveland would slow down service and decrease kayak and bicycle use in the park.

Other commenters were in favor of increasing access to the park through public transportation. Several commenters were excited by the prospect of expanded transit service to Cleveland, noting that it could help underserved communities access the park more easily. Commenters also were interested in the park promoting the CVSR and expanding connectivity to other transit options because it could allow people to explore more of the park, reduce congestion, improve air quality, and reduce greenhouse gas emissions. Commenters suggested improvements to the CVSR, including adding multiple stops to the Bike Aboard and Hike Aboard trips, allowing adaptive equipment like trikes and motorcycles on the train, and extending service into downtown Cleveland. One commenter suggested adding a train stop at Botzum. One commenter was interested in adding a ski train to the Boston Mills and Brandywine Ski Resorts to reduce traffic and improve access.

Amenities

Museums and Exhibits

One commenter suggested the park add a center on the history and culture of Native Americans who lived in the park area and requested the park include the exhibit in the development plans for the former Brandywine Golf Course (Peninsula Land Property). Another commenter requested the park restore the historical museum with information on barges and the Towpath Trail. One commenter suggested setting up webcams in sensitive areas and streaming the video in the visitor center.

Observation Decks and Viewing Areas

One commenter asked for a viewing platform or boardwalk in the Kendall recreation area. Commenters also asked the park to prune the shrubs along the Stumpy Basin boardwalk or to create a viewing platform in the area for enhanced views of the river. Commenters supported the idea of an accessible birding platform at the Coliseum site, while one commenter requested a boardwalk and seating area to view the wetland located north of Lock 29 parking lot. One commenter requested adding a covered porch around the Kendall Hills Pine Hollow restroom

building to provide an area to view the landscape and to soften the view of the restroom. One commenter requested improvements to the berm area on the south side of Bath Road. One commenter worried that improvements to viewing areas along Furnace Run would lead to more off-trail access of the stream.

Suggestions for Additional Amenities

Commenters requested expanded amenities at trailheads and popular park sites, including a water fountain, a bike cleaning station, picnic tables, a bathroom, and a pavilion or shade structure at the East Rim trailhead. One commenter suggested involving SMP with the improvements to the East Rim area. Another commenter asked for a bench at the Harvard Road trailhead. One commenter requested the park install bicycle racks at the entrance of Old Carriage Trail and at the entrances of all trails where bicycles are prohibited.

Commenters requested the park consider creating picnic areas like the Columbia picnic area on Riverview Road. Another commenter asked for picnic areas, bathrooms, and a drinking fountain at Oak Hill. Other commenters requested more trash cans and dog waste receptacles, specifically at the parking lot at Kendall Lake. Additional requests included gender-neutral bathrooms at trailheads, signage noting capacity for larger groups, and more lighting in the park after dark. One commenter suggested the park create a mobile application with GPS-enabled maps and information on park amenities.

One commenter was concerned about the upkeep of additional amenities and asked the park to confirm that it had proper funds for staffing and upkeep before adding amenities to the park.

Visitor and Park Staff Safety

Traffic Safety

Commenters requested the park address issues that contribute to vehicle interactions with cyclists and pedestrians. Commenters suggested the park focus on improving road quality, parking areas, and the sidewalks in front of the Boston Mill Visitor Center to improve cyclist and pedestrian safety. One commenter recommended that Szalay's Farm move all bike parking to the north side to eliminate all bicycle and car interaction on Bolanz Road.

Micromobility Transportation Safety

Commenters expressed concerns related to personalized electric transportation (i.e., e-bikes, electric scooters, hoverboards) and visitor safety. Commenters requested the park prohibit the use of e-bikes or provide additional measures to manage or enforce their use, such as posting speed limit signs.

River Safety

One commenter recommended the park create a cooperative plan with volunteers to clear out fallen trees across the river. Another commenter suggested using the old dam bypass in Peninsula as a safer alternative to the current river path. One commenter suggested the inclusion

of QR codes on river-specific brochures and access point signs to communicate safety parameters and inform visitors about the risks involved with difficulty levels, while another commenter suggested setting up a crowdsourced reporting system for strainers (obstructions in the river that catch objects but allow water to pass through) that boaters could use to report hazards.

Trail Safety

One commenter recommended the park consider confining bike use to the roadways and closing the East Rim trails to hikers due to potential hazardous interactions between cyclists and pedestrians. Another commenter suggested establishing “walk your bike zones” in crowded areas like Beaver Marsh. One commenter expressed safety concerns related to bicycle use and the presence of pets on trails. The commenter noted that many visitors do not keep their dogs on leash or do not have suitable control of their dog. The commenter further noted that hikers, particularly small children, could be hurt when sharing a trail with an off-leash dog or an inattentive cyclist and requested prohibiting pets and bicycles from trails. Another commenter noted that the area around Lock 29 is dangerous because of its busy trails and steep drop offs.

New Safety Features

Commenters noted that the plan focuses on collision-related hazards and does not provide any information on general safety issues. Commenters requested the park install new safety features throughout the park, including signs that provide ranger information, emergency blue-light phones, pedestrian-activated flashing lights on popular road crossings, and marked crosswalks.

Equestrian Use

Equestrian Trail Improvements

Commenters expressed concern that equestrians are losing places to ride and requested that the park prioritize bridle trails. Some commenters noted that horses, dogs, and hikers can coexist on trails, while another commenter asked for single-use trails for horses or prohibiting bicycles on horse trails. One commenter requested providing access to water at horse trailheads.

Equestrian Camping

Commenters favored providing more areas for camping with horses. Commenters requested reauthorization of equestrian camping at Robinson Field and noted that equestrian groups have made improvements to the area. One commenter suggested that Robinson Field could be a multiuse campground with a separation between horses and other campers. One commenter noted that equestrians often travel from far away, which makes day trips difficult.

Equestrian Parking

Commenters asked for more designated equestrian parking, especially at bridle trails. Commenters requested the park provide space for trailers to load and unload and design lots to

allow for cars and trailers to pass one another. One commenter requested the park provide enough distance between equestrian parking and regular parking. Commenters expressed appreciation for the Wetmore horse trailer parking improvements and the parking on Quick Road. Areas where commenters requested more horse trailer parking included:

- Covered Bridge (Everett Road)
- Boston
- Stanford House
- Station Road
- Brecksville
- Wheatley Rd
- Perkins Bridle Trail

River Access

New River Access Suggestions

Commenters made several suggestions for providing new river access points for canoeing, kayaking, stand-up paddleboarding, and fishing. Suggested locations for new access included:

- The confluence of Mill Creek and West Creek
- Cuyahoga River Water Trail
- Botzum parking lot
- Former Brandywine Golf Course (Peninsula Land Property)
- At the mouth of Tinkers Creek near Canal Road
- Ira Road
- Station Road
- Canal Visitor Center
- Between Station Bridge Road and Rockside Road

Commenters asked the park to prioritize the safety and ease of access in new access points and suggested paving some access areas. Another commenter noted that having more river access sites would improve safety in an emergency.

Access Improvements

Commenters suggested improvements to specific existing access locations including Lock 29, Station Road, and Boston. Commenters requested improved river access by car, and one commenter requested that the Brecksville access include a gravel drive for easier boat loading and unloading. One commenter asked for boat racks to be provided at the Lock 29 parking lot to avoid congestion in the parking lot. One commenter requested new access to Indigo Lake for fishing.

Coordination of Access with Train Stops

Commenters requested the park coordinate river access with train stops, such as designing put-in sites to minimize the distance visitors would need to carry their equipment from the train. Commenters requested the park accommodate river access on the same side that the train disembarks so visitors do not have to carry boats across bridges, specifically at the Boston, Station Road, and Rockside access locations. One commenter suggested the park provide carts to help transport boats between the train and the river.

Expansion of River Access and Opportunities

Commenters suggested strategies to get more visitors out on the river by providing more marketing and information on river access, offering guided and independent river excursions, and implementing a paddle share system. Additionally, commenters requested the park provide river access close to campgrounds or establish campgrounds geared toward river access.

One commenter was concerned about adding more access to the river and worried that it could detract from wildlife observation on the river and increase the need for river rescues.

Equitable and Inclusive Access

Accessibility Expansion

Some commenters supported expanding accessibility in the park and questioned how the plan supports the needs of visitors with disabilities and elderly visitors. Commenters desired accessible trails and routes in the Ledges area. One commenter expressed concern about providing limited mobility parking at Blue Hen Falls because it would be a large undertaking especially if it would require a paved ADA trail down from the Falls; the commenter noted that Brandywine Falls is already accessible.

Other commenters expressed some concern about the impacts of paving routes and the resources needed to achieve accessibility with the ADA. One commenter asked that the park be cognizant of design choices in making the park more accessible to maintain visitor experiences. One commenter was opposed to accessible parking at Blue Hen and thought that resources could be better used elsewhere, noting that other waterfalls, such as Brandywine Falls, are already accessible.

Access for Underserved Communities

Commenters provided suggestions for making the park more accessible to underserved communities, including expanding transit connections and frequency of service to the park to provide better access from areas such as Akron, Cleveland, and Independence. Bike- and kayak-share programs were proposed to allow people to bike and paddle without owning equipment. Commenters were supportive of multimodal transportation options to provide transit-dependent populations better access to the park and suggested that the park work with regional partners to achieve better connectivity. One commenter noted that reducing fares on the CVSR

would provide more equitable access to the park. Commenters also proposed ideas for more equitable programming in the park. Commenters asked for special programs and education opportunities, including transportation, aimed at city residents and underserved communities.

Accessibility Ideas and Suggestions

Commenters proposed new ideas to make the park more accessible. One commenter asked for benches to be placed every half mile along trails to increase accessibility and allow for breaks. Another commenter suggested the park repurpose the existing golf cart paths at the former Brandywine Golf Course (Peninsula Land Property) as accessible trails. Other commenters had suggestions for elderly visitors, such as easier river access and shorter paddling programs for seniors and creating programming for cognitively impaired seniors. One commenter suggested creating a loop drive with interpretive signage to provide access to the park's natural beauty and historic structures for those with limited mobility. One commenter suggested having wheelchair-accessible boardwalks and overlooks, including mirrors for wheelchair users. Some commenters asked for the new Coliseum site trail to be made ADA accessible.

Natural and Cultural Resources

Potential Impacts on Natural Resources

Commenters noted the impact that gravel bar camping could have on wildlife (e.g., it could discourage bird species from feeding, harm bird and turtle nests, and increase garbage along the river corridor). One commenter questioned if rangers would be assigned to the gravel bar camp sites to monitor potential impacts. Additionally, commenters questioned if surface treating the Towpath Trail with chip-sealed asphalt would cause environmental impacts, such as increased runoff into the river and reduced groundwater recharge. One commenter noted that the goal of "year-round visibility of the river and associated features" could lead to unnecessary removal of important riparian vegetation. A commenter worried about the environmental impacts of formalizing visitor-created trails, particularly those that access sensitive wildflower areas. Another commenter worried about increased traffic through the Blossom Woods Natural Area and the potential impacts to natural resources. Finally, one commenter requested the park conduct any review with the primary goal of promoting, sustaining, and educating the public on the conservation, restoration, and maintenance of natural resources with recreation as a secondary objective.

Suggestions to Improve and Protect Natural Resources

To further protect the environment, commenters suggested (1) increasing conservation efforts by planting milkweed, developing pollinator fields, protecting botanically sensitive areas and native plants, and better documenting rare plant species; (2) protecting open prairie areas at Kendall Hills and Pine Hollow to protect the threatened prairie warbler and other species that depend on early succession grasslands as habitat; (3) determining appropriate cutting schedules (such as at Beaver Marsh Towpath Trail) to avoid mowing wildflowers during bird and butterfly migrations; (4) restricting fishing to areas without dense vegetation to avoid the loss of fishing

lines and lures that are hazardous to wildlife; and (5) using social media to educate visitors about natural resources.

Preservation of Cultural Resources

One commenter felt that the assessment regarding abandoned structures degrading visitor experience is incorrect, and that many visitors come to the park to appreciate them. The commenter requested the park work to preserve these abandoned structures, specifically Abraham Ulyatt House, William H. Knapp House, Stebbens Farm, Packard-Doubler House, and Hammond-Cranz Farm. Another commenter specifically requested the park preserve the Red Linley Barn on Stanford Road. Another commenter asserted that removing sites because they do not meet National Register of Historic Places standards would be drastic, could be detrimental to natural habitats, and would destroy the ability to gather information on the sites in the future.

Archeological Resources

One commenter noted that the entire corridor surrounding the Cuyahoga River is archeologically sensitive and contains many precontact sites, some known and some not yet identified and inventoried. The commenter asked that any planned changes to access consider the vulnerability of archeological sites to looting activity. They also noted that looting and vandalism activity around archeological sites is rarely reported and that the sites are seldom patrolled, leading to greater visitor impacts to cultural resources.

A commenter worried about impacts to archeological sites as a result of planned parking changes at Brandywine Falls and near the Everett Covered Bridge. The commenter noted that improved parking at Brandywine Falls could lead to more foot traffic through Waldo Semon Woods Conservation Area's precontact and historic archeological sites. The commenter expressed concern that increasing traffic in areas throughout the river valley would encourage off-trail use in sensitive archeological areas. The commenter also asked that a cooperative management plan be adopted for areas with archeological sites, including collaboration with SMP.

Plan Scope and Goals

Plan Goals and Objectives

Commenters discussed the presented goals and objectives of the plan and noted that certain actions seem contradictory to the stated goals or the current rural character of the park. As an example, commenters felt the actions to expand parking lots and offer recreational equipment rentals contradicted the goal to reduce congestion in the park because these actions would draw more visitors. Similarly, another commenter noted their confusion at the need to increase picnicking areas while removing picnic areas in other locations. Another commenter noted that certain parts of the plan were pedestrian-focused and excluded cyclists from consideration. One commenter suggested the park review how visitor interest and activities have changed over the

years and cater the plan's goals and objectives for the allocation of resources in the park based on these findings. Another commenter recommended listing property acquisition to support protection of natural and cultural resources as a key action in the plan. One commenter felt that the goals and actions outlined in the plan were too vague and unclear for substantive comments to be made.

Action Priorities and Timeline

Commenters questioned which of the presented changes were considered the most necessary to implement over the next several years to avoid significant impacts to visitors and resources. One commenter requested information on the timeline of the plan.

Editorial Comments

Commenters discussed the difficulties they had reading and comprehending the plan due to its length, organization, and use of acronyms. To better involve readers, commenters suggested NPS refine the plan by using common language, spelling out acronyms throughout the document, focusing on key areas of the park, and providing more background on the research conducted to reach the conclusions and recommendations in the plan.

Bike Use

Gravel and Mountain Biking

Commenters were in favor of more areas and trails for mountain and gravel biking. Commenters requested better trail access between the Towpath Trail and the Hike and Bike Trail for bikers and asked that the current trail connecting Brandywine Falls and the Stanford House be improved. One commenter requested gravel bike trails on historic carriage roads and from Old Akron Peninsula Road to Peninsula. Commenters also asked for a mountain biking trail adjacent to Hemlock Creek Trail, trails in the Virginia Kendall/Kendall Hills area, in the Oak Hill/Everett area, and in the Red Lock/Carriage Trail area. Several commenters asked the park to prioritize mountain biking trails, noting the popularity of the sport. Commenters asked the park to keep old roadbeds, such as Stanford Road, Akron Peninsula Road, and Everett Road, open for mountain biking, noting that the areas are good for training and for the biking community. One commenter expressed frustration over the closure of Everett Road and asked that it be left open for bikers and hikers to use.

Road Biking

Commenters suggested improvements to the road biking infrastructure in the park and proposed adding bike lanes or trails to roads to increase safety and reduce dependence on cars. One commenter specifically requested a separate bicycle path or trail along State Route 303 East for a better bike connection to Peninsula. Another commenter asked the park to consider periodic road closures for better and safer cycling.

NPS Staffing and Volunteers

Expanded Role of Volunteers

Commenters requested the park expand its volunteer programs and opportunities. Further, commenters requested volunteers take on a more formal role at the park to monitor for issues such as resource degradation and invasive species or assist in trail maintenance. Commenters suggested the park reach out to trail running groups and mountain biking communities to support volunteer efforts.

Increased Staffing and Enforcement

Commenters requested the park provide more rangers and funding to better enforce the rules of the park, particularly on the Towpath Trail. One commenter requested rangers remain in the park overnight during the weekends and most often during the fall. Commenters questioned whether there would be funding available for the increase in staff needed to manage the proposed management strategies.

Howe Meadow Redesign

Redesign Suggestions

Commenters requested primitive, electric, and horse camping as types of group camping at Howe Meadow. One commenter requested the park create individual campsites across the park before focusing on the group camping the plan suggests at Howe Meadow. In addition to camping, one commenter requested Howe Meadow provide paved parking, ADA-accessible restrooms, and connector trails to Indigo Lake and Hale Farm.