



Abbreviated Final General Management Plan/  
Environmental Impact Statement  
and  
Foundation Plan for

# New River Gorge National River

West Virginia  
2011



Cover Photo: Diamond Point Sunrise (NPS/Gary Hartley)

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New River Gorge National River encompasses 72,186 acres within a 53-mile corridor along the New River in West Virginia, extending from the city of Hinton on the south to the upstream limits of Hawks Nest State Park on the north. Since its establishment in 1978, the National Park Service (NPS) has acquired 53,580 acres from willing sellers within the park boundary and has secured conservation easements on 164 acres. The NPS is responsible for managing the park to conserve its scenery, natural and historic resources, and wildlife and to provide for its enjoyment in a manner that will leave it unimpaired for the enjoyment of future generations.

The *Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS)* for New River Gorge National River provides management guidance for the park. The draft plan was available for public and agency review from January 13, 2010 through April 16, 2010. The document presents and evaluates five management alternatives:

**Alternative 1** is a continuation of current management and trends. The park's enabling legislation and the existing *General Management Plan* (NPS 1982) would continue to guide park management. The NPS would manage park resources and visitor use as it does today, with no major change in direction. Improvements to visitor facilities and park operations facilities would include only projects that are already approved and fully funded. (Built aspects of this alternative would be included in alternatives 2 to 5).

**Alternative 2** emphasizes the substantial differences among subareas of the gorge, improving them to reflect their differing character, resources, and visitor experiences. Management actions would build upon the cultural resource, interpretive, and recreational opportunities within the north and south ends of the park, while retaining a primitive quality in the middle of the park.

**Alternative 3** would unify the park by providing a north-south through park hike and bike trail that enables visitors to travel the park on singletrack trails at or near the river. Existing scenic roads would be enhanced. New access and facilities in the middle of the park would balance opportunities for visitors throughout the park.

**Alternative 4** recognizes river gateways and the rim to river experiences that take visitors to them as the primary access points and orientation venues in the park. River gateways would be enhanced to tell gorge stories while providing improved river, trail, and recreational access. The NPS and gateway communities would work cooperatively to enhance rim to river experiences.

**Alternative 5** would preserve areas for primitive recreational experiences from end to end of the park. Interspersed with these primitive areas would be cultural and interpretive resource focal areas where visitors could explore communities and other places that once populated the gorge, experience the river, and enjoy a variety of recreational experiences. A north-south through park connector composed of improved scenic roads and trails would enable visitors to travel the length of the park, visiting these areas and accessing the backcountry. Partnerships with gateway communities and improved rim to river experiences would foster links to the park as a whole and to specific cultural and interpretive resource areas within the park. Other connecting trails outside the park – made possible through partnerships – would offer visitors an opportunity to hike or bike from New River Gorge National River to the Bluestone National Scenic River, the Gauley River National Recreation Area, and other attractions in the region.

Environmental impacts resulting from implementation of the alternatives are addressed in the GMP/EIS. Impact topics include: physiography, geology, and soils; floodplains; water quality; vegetation; aquatic wildlife; terrestrial wildlife; rare, threatened, and endangered species; scenic resources; archeological resources; cultural landscapes; historic structures; ethnographic resources; regional and local economy; communities; visitor use and visitor experience; park access; and park operations.

This document is an *Abbreviated Final General Management Plan/Environmental Impact Statement* for New River Gorge National River. It responds to and incorporates the public comments received on the *Draft GMP/EIS*. An abbreviated final GMP/EIS is used because the comments received require only minor responses and editorial changes to the *Draft GMP/EIS*. No changes have been made to the alternatives or to the impact analysis presented in the *Draft GMP/EIS*. Therefore, alternative 5 remains as the NPS preferred alternative. The public release of the *Abbreviated Final GMP/EIS* will be followed by a 30-day no-action period, after which the NPS will prepare a Record of Decision to document the selected alternative and set forth any stipulations for implementation of the GMP. The *Abbreviated Final GMP/EIS* and the *Draft GMP/EIS* constitute the complete and final documentation upon which the Record of Decision will be based.

For further information, please contact: Don Striker, Superintendent, New River Gorge National River, P.O. Box 246, Glen Jean, WV 25846-0246; email – [NERI\\_Superintendent@nps.gov](mailto:NERI_Superintendent@nps.gov)



## United States Department of the Interior



NATIONAL PARK SERVICE  
New River Gorge National River  
104 Main Street, P.O. Box 246  
Glen Jean, West Virginia 25846

Dear Reader:

I am pleased to share with you this *Abbreviated Final General Management Plan/Environmental Impact Statement* (GMP/EIS) for New River Gorge National River. The document includes an analysis of comments received on the *Draft GMP/EIS* with NPS responses, errata sheets detailing editorial corrections to the *Draft GMP/EIS*, and copies of agency and substantive public comments. The plan will guide long-term decisions about the preservation and use of New River Gorge National River.

Over the past few years, the public has participated in the planning process through public meetings, formal and informal consultation, newsletters, and materials posted on the internet. In early 2010, the *Draft GMP/EIS* was available for public review for over 60 days. Approximately 300 interested individuals, agencies, and organizations received either a CD or paper copy of the plan. Copies of the draft plan were also available for review at the park's visitor centers, at local libraries, and on the NPS Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/NERI>). The NPS hosted public open houses on March 9, 10, and 11, 2010. Press releases, email notifications, and messages on the park's nps.gov homepage announced the availability of the document, as well as the public open house dates and times.

The National Park Service (NPS) received 77 pieces of correspondence on the draft plan. This commentary was thoughtful, helpful, and sincere. I would like to thank the people who commented for sharing their insights. I also would like to express our appreciation to the many people – partners, advisors, and members of the public – who provided input throughout the planning process. Your input has confirmed our belief that alternative 5 is the preferred alternative and that the management actions it proposes will best guide long-term stewardship of New River Gorge National River.

The enclosed document is in an abbreviated form because comments received during the public review period required only minor responses and editorial changes to the *Draft GMP/EIS*. There are no changes to the alternatives or the impact analyses presented in the *Draft GMP/EIS*. Alternative 5 remains the NPS preferred alternative. The abbreviated format has allowed us to produce a simple brief document and to avoid costly reprinting of the entire 900-page document.

The public release of the *Abbreviated Final GMP/EIS* will be followed by a 30-day no-action period, after which the NPS will prepare a Record of Decision to document the selected alternative. The *Abbreviated Final GMP/EIS* and the *Draft GMP/EIS* constitute the documentation upon which the Record of Decision will be based.

Sincerely,

Don Striker  
Superintendent



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## 1.0 Introduction

This document is an *Abbreviated Final General Management Plan/Environmental Impact Statement* for New River Gorge National River (NRGMR). It is composed of the NPS responses to public comments, errata detailing editorial changes to the *Draft General Management Plan/Environmental Impact Statement*, and copies of substantive comment letters (appendix A).

Public review of the *Draft General Management Plan/Environmental Impact Statement (GMP/EIS)* occurred from January 13, 2010 through April 16, 2010. Approximately 300 interested individuals, agencies, and organizations received either a CD or paper copy of the plan. An additional 550 individuals, agencies, and organizations received postcards announcing availability of the plan. The NPS made the plan available for review at park headquarters, Canyon Rim Visitor Center, Sandstone Visitor Center, and three local libraries. The NPS Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/NERI>) offered interested parties an opportunity to review and comment on the plan via the internet. On March 9, 10, and 11, 2010, the NPS hosted open house meetings in Hinton, Beckley, and Fayetteville, WV, respectively, where the public had opportunities to review the plan and provide comments. Press releases in three local newspapers and the park's nps.gov homepage announced the availability of the plan, as well as the public open house meeting dates and times.

This *Abbreviated Final GMP/EIS* responds to and incorporates the public and agency comments received on the *Draft GMP/EIS*. An abbreviated final GMP/EIS is used because the comments received require only minor responses and editorial changes to the *Draft GMP/EIS*. NPS Director's Order 12 Handbook, section 4.6(D) defines minor as "making factual corrections, or explaining why comments do not warrant further agency response." No changes have been made to the alternatives or to the impact analyses presented in the *Draft GMP/EIS* as a result of public comments.

Following the public release of this *Abbreviated Final GMP/EIS*, there will be a 30-day no action period, after which the NPS will prepare a record of decision documenting the selected alternative and setting forth any stipulations for implementation of the GMP. This *Abbreviated Final GMP/EIS* and *Draft GMP/EIS* will constitute the complete and final documentation upon which the record of decision will be based.

## 2.0 Comments and Responses Summary

The park superintendent received 77 pieces of correspondence in the form of letters (14), comment sheets from the open houses (1), and electronic comments submitted through the NPS PEPC website (65). Approximately 30 percent of the correspondence was "form letters" or correspondence from different people containing nearly identical content. Form letters that were "personalized" were treated as unique pieces of correspondence, as some were

personalized. Three letters were received in duplicate with the same comments submitted in multiple ways (letters and NPS PEPC website).

The GMP Planning Team carefully reviewed and considered each piece of correspondence received. From the correspondence the GMP Planning Team identified 109 “comments” or statements regarding a particular issue. The team then categorized these comments as substantive or non-substantive, pursuant to the Council on Environmental Quality guidelines. NPS Director’s Order 12 Handbook, section 4.6(A) defines substantive comments as:

*Substantive comments are those that do one or more of the following:*

- *question, with reasonable basis, the accuracy of information in the EIS*
- *question, with reasonable basis, the adequacy of environmental analysis*
- *present reasonable alternatives other than those presented in the EIS*
- *cause changes or revisions in the proposal*

*In other words, they raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.*

Responses are required for all substantive comments. Responses may also be provided for non-substantive comments that warrant clarification of NPS policy or the content of the *Draft GMP/EIS*. In this *Abbreviated Final GMP/EIS*, responses are provided for substantive comments as well as for non-substantive comments that warrant clarification. All agency correspondence and correspondence containing substantive public comments are reprinted in full in appendix A. A full set of the correspondence is available upon request.

Fourteen commenters identified action alternative 5, the preferred alternative, as their preferred alternative. Many commenters stated support for particular components of the preferred alternative. One individual identified alternative 1, the continuation of current management, as his/her preferred alternative.

Topics on which more than three comments were received included:

- significance of the park as a whitewater recreation experience
- BASE jumping as an appropriate activity that should be permitted on a regular basis in the park
- need for safe access for private boaters at Fayette Station
- need for a river gauge at Cunard

## 2.1 Substantive Comments Requiring Responses

The following section summarizes the substantive comments received and presents the corresponding NPS response. The correspondence for each of the substantive comments is reprinted in its entirety in appendix A.

### Topic: Wild and Scenic River Eligibility

**Comment.** One commenter questioned whether the NPS had appropriately considered wild and scenic river status for the New River and its tributaries.

**Representative Quote:** "It has since become common practice for all agencies to document consideration of eligibility for Wild and Scenic designation in planning processes. In our opinion several tributaries of the New River are potentially eligible for wild and scenic designation and thus should be listed in the Nationwide Rivers Inventory and protected as eligible rivers. In addition, some consideration of the suitability of the New River Gorge itself should have been conducted."

**NPS Response.** Congress has previously examined on several occasions the potential for wild and scenic river (WSR) designation for the New River and its tributaries. In 1976 the Bureau of Outdoor Recreation, in response to a Congressional request, recommended that the New River Gorge be designated a component of the National Wild and Scenic River System under overall management of the NPS. In the mid-70s one conservation group supported designation of the New River as a WSR, while another local group supported its designation as a national park. In 1978, Congress considered both designations and instead chose, through Public Law 95-625, to establish the New River Gorge National River. This legislation amended the National Wild and Scenic Rivers Act, adding various river segments to the system and designating rivers for study. It also established, in Title XI section 1101, the New River Gorge National River as a unit of the national park system "for the purpose of conserving and interpreting outstanding natural, scenic, and historic values and objects in and around the New River Gorge and preserving as a free-flowing stream an important segment of the New River...for the benefit and enjoyment of present and future generations...". Furthermore, section 1108 amended section 5(a) of the Act of October 2, 1968 (82 Stat. 910) to provide for study of three principal tributaries of the New River in West Virginia... including the Bluestone, Gauley (including the tributaries of the Meadow and Cranberry), and the Greenbrier." The national river protections extended beyond the New River itself to include an area much larger than the average width of a WSR corridor, with several tributaries extending over five miles. The New River was added to the National River Inventory in 1982, identifying four outstandingly remarkable values – wildlife, recreation, cultural, and geologic.

Congress reexamined potential WSR designations for the New River and its tributaries through Public Law 100-534 known as the "West Virginia National Interest River Conservation Act of 1987." Section 2 Findings and Purpose (a) of the Act states, "The Congress finds that,

(1) the outstanding natural, scenic, cultural and recreational values of the segment of the New River...within the boundaries of the New River Gorge National River have been preserved and enhanced by its inclusion in the national park system; (4) several tributaries of the New River in West Virginia also possess remarkable and outstanding features of national significance; (5) portions of several of the New River tributaries, including segments of the Gauley River, the Meadow River, and the Bluestone River are suitable for inclusion in the National Park System or the National Wild and Scenic Rivers System; and (6) it is in the national interest to preserve the natural conditions of certain segments of the New, Gauley, Meadow, and Bluestone Rivers in West Virginia to enhance recreational opportunities available on the free-flowing segments." Further, Congress in Title I of the West Virginia National Interest Conservation Act of 1987 addressed issues at the New River Gorge National River, in Title II established the Gauley River National Recreation Area, and in Title III designated the Bluestone National Scenic River.

Based on this extensive legislative history, the NPS has concluded that the eligibility and suitability assessments required pursuant to NPS policy have been met and that Congress has acted on the agency's proposal. Further eligibility recommendations for additional tributaries within the authorized boundary of New River Gorge National River are unnecessary due to the much greater protections afforded by the national river designation. Since the NPS does not believe that the management actions included in the GMP alternatives would adversely impact the values that potentially qualify the New River for inclusion in the National Wild and Scenic Rivers System, this topic was dismissed from further analysis.

The *Abbreviated Final GMP/EIS* (pages 1-37 and 1-38) includes via errata (see section 3.0 below) revised text documenting how Congress and the NPS have considered wild and scenic river status for the New River and its tributaries.

**Topic: Park Access – Rail Service within the Gorge**

**Comment.** One commenter suggested creating rail service to move visitors through the gorge.

**Representative Quote.** "I would encourage the Park Service to also consider returning the "South Side Junction" railroad corridor to its turn of the century use of moving people and freight through the gorge. The existing railroad bed on the left side of the river from near Thurmond to Cunard would be the perfect venue for an "alternative intermodal transportation system" which would serve all visitors to the New River Gorge. Unlike the proposed road creating just another put-in above Surprise, the railroad could and would provide access to a larger and more diversified group of park users."

**Response.** The notion of using existing and historic rail lines to move people in the gorge is an interesting one. However, providing rail service on either a branch or the main line within

the gorge requires additional study beyond the scope of this GMP. The NPS currently has funding to conduct a separate planning process that will explore alternative transportation options within the gorge, one of which will be rail access. Existing and historic rail lines offer the possibility for incorporating rail in an alternative transportation system or excursion routes. NPS will consider rail as an option for moving people and boats.

The *Abbreviated Final GMP/EIS* (page 2-147) includes via errata (see section 3.0 below), a summary of how the NPS would consider use of existing and historic rail lines to enhance visitor access to the park.

**Topic: Resource Management – Water Quantity in the Gorge**

**Comment.** Three commenters suggested that the GMP address water quantity.

**Representative Quote.** "We note that neither the GMP nor the Water Resources Management Plan, New River Gorge National River (Purvis et al 2002) addresses the issue of water quantity in the gorge. Increasing withdrawals upstream will continue to impact low gorge flows unless addressed."

**Response.** Public law and NPS policy have previously addressed the water quantity issue at New River Gorge National River. Public Law 95-625, section 1110, requires the Secretary of the Army to cooperate with the Secretary of the Interior concerning the water requirements of the national river, stating that "The Secretary of the Army shall provide for release of water from the Bluestone Lake project consistent with that project's purposes and activities in sufficient quantity and in such manner to facilitate protection of biological resources and recreational use of the national river." Public Law 100-71, section 104, further directs the Secretary of the Army, in conjunction with the Secretary of the Interior, to conduct studies of flow adjustments from the Bluestone Dam..."to improve recreation (including, but not limited to, fishing and whitewater recreation) in the New River Gorge National River." *NPS Management Policies 2006*, section 4.6.2 Water Rights, states, "The Park Service will consider all available authorities on a case-by-case basis and will pursue those that are the most appropriate to protect water-related resources in the parks." The NPS recognizes this important need for cooperation and will add it to the text addressing partnerships in alternative 5 – preferred alternative.

The *Abbreviated Final GMP/EIS* (page 2-152) includes via errata (see section 3.0 below), a revised statement regarding future partnerships with the WV DNR and the Army Corps of Engineers (page 2-152).

**Topic: Visitor Facilities – Surprise River Access Impacts**

**Comment.** Two commenters pointed out the inconsistent description of the river access at Surprise.

**Representative Quote.** "On page 4-237, it is stated that "if a new river access is developed at Surprise (as in alternative 3), some facilities would be located in the floodplain and would impact a mature oak-tulip poplar floodplain forest on Red Ash Island. Impacts on the floodplain forest would be mitigated by limiting visitor use facilities in the floodplain to the minimum possible, including an access road, and access trail, small drop off area, disabled river access, and launch site..." It is unclear how the decision would be made about this location in alternative 5. If this facility is built, additional efforts should be made to avoid and minimize impacts to this area."

**Response.** The GMP incorrectly states that the new river access at Surprise would include development of facilities on Red Ash Island. The proposed site for a new river access at Surprise – if determined to be needed – would be located upstream of Surprise Rapid and downstream of Red Ash Island, not on Red Ash Island. Thus there would be no impacts to the floodplain forest or other natural or cultural resources located on Red Ash Island. The actions to be taken at Cunard and prior to any new development near Surprise are listed on pages 2-147 and 2-148. Efforts would be made to avoid and minimize impacts to the floodplain, vegetation, terrestrial wildlife habitat other resources in the area.

The *Abbreviated Final GMP/EIS* (pages 2-194, 4-133, 4-134, 4-139, 4-140, 4-145, 4-146, 4-236, 4-237, 4-238, 4-243, 4-244, 4-249, and 4-250) includes via errata (see section 3.0 below), revised statements regarding the impacts of development of a new river access near Surprise on floodplains, vegetation, and terrestrial wildlife habitat.

**Topic: Visitor Use – BASE Jumping**

**Comment.** Forty-six commenters supported BASE (i.e., buildings, antennae, spans, earth) jumping (including 20 form letters).

**Representative Quote.** "NERI should state that BASE jumping is an appropriate activity (at certain times) within the park in their GMP.

It is requested that NERI include a provision for permitting certain types of parachute jumps that may occur outside of Bridge Day (legal catwalk BASE jumping, commercials, test jumps, special stunts) without having to consult Washington for a Director's Waiver. Including BASE jumping in the GMP would solve this problem by permitting the NERI Superintendent to approve appropriate parachute jumps.

NERI should also include "Bridge Day BASE Jumping" as part of any NPS stories that are told to park visitors."

**Response.** The NPS agrees that BASE jumping is an appropriate activity from the New River Gorge Bridge during the annual Bridge Day celebration. The NPS will add a statement to this effect in the GMP under the no action alternative. All actions in the no action alternative would be carried forward into all the action alternatives.

The request to provide additional opportunities to BASE jump falls outside the scope of this GMP and would need to be addressed in a separate analysis with appropriate environmental compliance.

Recreational activities and stories would continue to be included in interpretive themes, stories, and informational materials, as appropriate, including Bridge Day BASE jumping.

The *Abbreviated Final GMP/EIS* includes via errata (see section 3.0 below), revised statements regarding BASE jumping in Table 2.5 Alternative 1 – Area-Specific Desired Conditions (page 2-21) and in Table 2.6, Park Development Zone, Activities (page 2-27).

#### **Topic: Wildlife and Wildlife Habitat: Jurisdiction**

**Comment:** The West Virginia Division of Natural Resources (WV DNR) stated multiple times that the ultimate authority to manage the state's fisheries and wildlife within the New River Gorge National River lies solely with WV DNR and that the NPS lacks jurisdiction for management of these resources. They further state that the WV DNR jurisdiction to manage fisheries extends to all management considerations including stocking and eradication, and that the NPS has no authority in these matters.

**Representative Quotes.** Foundation Plan page 21. "The protection and management of all aquatic species lies solely with the WV DNR and it remains our contention that NPS lacks jurisdiction for management or "eradication" of any aquatic species within the New River or its tributaries."

GMP page 2-31, table 2.8, Desired Condition 6, fourth bullet. "This statement is beyond the scope of authority for the national river. The WV DNR has jurisdiction for fishery management and will determine, by application of appropriate research, what species will be stocked or not stocked into the New River and its tributaries; see also section 1106 Paragraph 2 of Public Law 104-333(1996)."

GMP page 2-31, table 2.8, Desired Condition 6, fifth bullet. "This statement is beyond the scope of authority for the National River. The WV DNR has jurisdiction for fishery management and will determine what actions will be implemented or curtailed in the management of the fishery of the New River and its tributaries including stocking of non-native species."

**Response.** The enabling legislation for the park, the NPS' national regulations, and multiple statements of NPS policy reinforce the value of communication, consultation, and coordination between the NPS and state agencies. These expressly include the need for mutual consultation by both the NPS and the state agencies responsible for hunting and fishing activities. NPS recognizes the advantages to both levels of government of working through differences in management of natural resources, and hopes to work closely with the WV DNR to resolve any differences, including those regarding fisheries that may develop. Consultation and coordination will, we hope, always be our first response to any difference in philosophy.

In addition, non-conflicting hunting and fishing regulations of the state are explicitly incorporated into the regulations of the park.

However, we cannot concur that NPS does not have jurisdiction in the cases you mention. While the reasons and legal analysis of federal and state jurisdiction are too complex to present here, we would welcome follow-up meetings with any appropriate state officials in order to develop a common understanding regarding our mutual enforcement authority over wildlife.

Both the park's authorizing legislation and various NPS regulations reinforce the importance of consultation between the NPS and the appropriate state agency, and this will always be our preferred way of working with the state and the WV DNR. However, should there be management concerns regarding adverse impacts from fishing or hunting, the Superintendent is charged with managing these activities consistently with resource and public protection concerns.

## 2.2 Non-Substantive Comments Requiring Clarification

### Topic: Aquatic Wildlife – Trout Species in Tributaries

**Comment.** WV DNR suggested adding species to the list of most common fish within the New River and its tributaries.

**Representative Quote.** GMP, page 3-22, Aquatic Wildlife, Fish, paragraph 2, last sentence. "Only a few of the tributaries actually have brook trout present, however many have fishable brown trout populations which were established through fingerling stockings. Limited brown trout reproduction has been documented from Fat Creek, Piney Creek and possibly Glade Creek. Some tributaries support a put and take trout fishery; therefore, both brown and rainbow trout should be listed here."

**Response.** Brown trout are native to Europe and do not naturally occur in the waters of West Virginia. NPS regulations, at Code of Federal Regulations section 2.1(a)(2), forbid the introduction of any wildlife or fish into park area ecosystems. While fish stocking is allowed by statute and policy, stocking of exotic species is not allowed in order to sustain natural ecological conditions.

The enabling legislation for the park, the NPS' national regulations, and multiple statements of NPS policy reinforce the value of communication, consultation, and coordination between the NPS and state agencies. These expressly include the need for mutual consultation by both the NPS and the state agencies responsible for hunting and fishing activities and incorporate non-conflicting state hunting and fishing regulations. NPS recognizes the advantages to both levels of government of working through differences in management of natural resources, and hopes to work closely with the WV DNR to resolve any differences, including those regarding fisheries, that may develop. Consultation and coordination will, we hope, always be our first response to any difference in philosophy.

Both the park's authorizing legislation and various NPS regulations reinforce the importance of consultation between the NPS and the appropriate state agency, and this will always be our preferred way of working with the state and the WV DNR. However, should there be management concerns regarding adverse impacts from fishing or stocking with exotic species of fish, the Superintendent is charged with managing these activities consistently with resource and public protection concerns.

### **Topic: Aquatic Wildlife – Non-native Gamefish**

**Comment.** WV DNR objected to the use of the term "non-native".

**Representative Quote.** Foundation Plan, page 20, Hydrologic – Aquatic Ecosystems.  
"We reject the continued use of "non-native" when referring to the game fish species of the New River. Most, if not all, were introduced many years ago and the public greatly enjoys them."

Foundation Plan, page 20, Hydrologic – Aquatic Ecosystems, Stakeholder Interest, second bullet. "The statement saying "that a number of anglers ...rely on non-native gamefish" is not totally true because some of the groups listed are trout groups and brook trout are native to most small streams in WV. Additionally, many anglers pursue the two native catfish species and the walleye which is also native."

**Response.** The term "non-native" is an accurate term for introduced fishes that do not naturally occur where they are introduced, as WV DNR notes in their comments. Also, use of this term is consistent with *NPS Management Policies 2006* (section 4.4.1.3, paragraph 1) which explains that the exotic (non-native) species are present directly or indirectly as a result of deliberate or accidental human activities. Such species did not evolve in concert with

the species native to the place and are not a natural component of the natural ecosystem at that place.

The second statement is accurate. The most common target of most anglers in the New River is the non-native smallmouth bass. Except for green sunfish, all of the centrarchids (black basses and other sunfish – the most common warmwater gamefish family) are introduced, as are the musky and the white and striped basses. While it is true that channel and flathead catfish are native to the New River and that the New River supports fisheries for these species as well as for the presumptive native walleye, these fisheries are significantly smaller than for the non-native gamefish.

There is scant evidence that brook trout are native to the New River Gorge region. This statement is supported by (1) "*Fishes of Virginia*" and (2) the map on page 3 of "*Eastern Brook Trout: Roadmap to Restoration*" published by the Eastern Brook Trout Joint Venture (of which NPS and WV DNR are partners) which shows the area of New River Gorge National River as the "Absent, Unclear History" category. While brook trout may be native to some streams in extreme eastern West Virginia and the upper reaches of the New River watershed in North Carolina and Virginia, they would not likely fair well in traversing the waters of the New River that often exceed the lethal thermal maximum for brook trout. Trouts other than brook are decidedly non-native to the New River Gorge area. Brown trout are native to Europe, and rainbow trout are native to the Pacific drainages of North America.

### **Topic: Aquatic Wildlife – Hydropower Threats**

**Comment.** WV DNR suggested that the addition of hydropower at Bluestone Dam would have a potential adverse effect to fisheries.

**Representative Quote.** Foundation Plan, page 20, Hydrologic – Aquatic Ecosystem, Potential Threats, last sentence. "Addition of hydropower at Bluestone Dam has the potential to adversely impact fisheries and other aquatic resources by altering flows and thermal regimes leading to the loss of downstream productivity provided by the surface outflow of the dam."

**Response.** Operation of Bluestone Dam to include hydropower generation has the potential to impact fisheries and other aquatic resources by altering flows and thermal regimes. However, we do not believe that the present state of the plans permit an educated evaluation of what impacts might actually occur. However, NPS will continue to monitor this proposed project carefully, and will work with the WV DNR to ensure that fisheries are not impacted.

### Topic: Cultural Resources - Protection

**Comment.** Three commenters suggested that the park should make a greater effort to protect cultural resources, especially those within view of paddlers from the river.

**Representative Quote.** GMP, page 1-21. "Greater effort should be made to preserve rapidly disintegrating historical resources, especially those facilities within view of the paddlers on the river. A priority example would be the old post office and general store at Lower Kaymoor."

**Response.** We concur, and within available budget, will do our best to preserve these structures. The management strategies shown in table 2.8 (Parkwide Desired Conditions 15 through 20 on pages 2-34 and 2-35) are the actions that the NPS would implement to achieve and maintain over time the park's desired cultural resource conditions. The strategies address the management issues challenging the park relevant to stabilizing and otherwise treating cultural resources. In addition to these specific strategies, resource conservation efforts would be implemented through public outreach and education to better inform the public of the threats to the park's cultural resources and the efforts undertaken to protect them. Further information regarding cultural resource treatment is provided in the GMP under Cultural Resource Treatment Contexts (page 2-49) and under Cultural Resource Management (Alternative 5 – Preferred Alternative) (pages 2-142 and 2-143). The structures at Lower Kaymoor would be managed as discovery sites (as described on pages 2-49 and 2-143). Treatments in the future would be subject to funding availability and resource prioritizations.

### Topic: Cultural Resources - Farming

**Comment.** One commenter suggested allowing farming by permit was inappropriate.

**Representative Quote.** GMP, page 3-6. "No farming should be allowed in the entire park unless on private property. The population of the U.S. did not save this site for farms. It saved it for protection of wildlife and vegetation. Get the damn farms out and let them lease private land and pay for it."

**Response.** The remaining farm landscapes at the national park have been identified as significant, and leasing is a management option proposed as a tool to manage them. Many other national parks utilize leasing as a mechanism to manage farm landscapes. At New River Gorge, maintaining open fields will also benefit open land birds. When farm fields are leased, those farmers pay fair market value for their use of the land.

### **Topic: Miscellaneous Topic - References**

**Comment.** Two commenters questioned the applicability of the references and environmental studies cited.

**Representative Quote.** "The references and environmental studies are over 25-years-old, have nothing to do with the project and have been found to be not applicable to other NPS supported projects in the same "focal area"."

**Response.** The NPS used the most current available information for the park to prepare the GMP. References (as cited on pages References-1 through References-14) include a wide range of studies conducted by the NPS and researchers in recent years, as well as studies and plans that go back to and before the park's inception in 1978. The references provide a valuable historic record of all planning projects conducted in the park, many of which continue to offer information useful to present park managers.

### **Topic: Miscellaneous Topic – GMP Revision Frequency**

**Comment.** One commenter asked for clarification of the GMP planning cycle.

**Representative Quote.** "Why is this plan revised every 3 years? The plan needs to use updated info to set up a plan for 15 years. The expense of revision every 3 years is unbearable for us taxpayers."

**Response.** The NPS prepares GMPs for all units of the national park system on a 15- to 20-year cycle. NPS prepared the last GMP for New River Gorge National River in 1982, or 28 years ago. The "Dear Reader" letter – found at the beginning of the new GMP – states that once reviewed and finalized, the GMP will guide the management of the park for the next 20 years." Page i of the Summary (under Purpose and Need for the General Management Plan) also provides a brief explanation of why and how often the NPS completes GMPs for parks.

### **Topic: NEPA Compliance – Future GMP Implementation**

**Comment.** One commenter stated that additional opportunities to avoid and minimize environmental impacts should be considered and that additional information should be provided regarding future compliance with the National Environmental Policy Act (NEPA) for the various proposed projects included in the GMP.

**Representative Quote.** "While this is a management plan and lacks details about specific impacts, additional information should be provided about next steps and NEPA documentation for various projects. We look forward to working with NPS as the projects move forward. The team should look for additional opportunities to avoid and minimize environmental impacts."

**Response.** The next steps for implementing the GMP are discussed in the Summary – Implementation of the Plan (page xiv). As noted there and on page 5-9 (section 106 consultation), page 5-10 (section 7 consultation), and pages 5-10 and 5-11 (Draft GMP Document Review), if and when specific projects outlined in the GMP are funded and proposed for implementation, the NPS will complete the NEPA compliance process as the scope of the individual project warrants. All attempts to minimize or mitigate potential adverse impacts to wildlife species, plants, cultural resources, and other park resources will be considered and implemented. During the NEPA compliance process, the NPS will consult with appropriate federal, state, and local agencies.

**Topic: Park Access – Planned Improvements and Agency Coordination**

**Comment.** One commenter suggested the need for additional information concerning improvements to area roads.

**Representative Quote.** "Additional information should be included about improvements to area roads and how that will be coordinated with transportation agencies; for example, on page 4-281, "improvements would be made to WV Route 25 from Glen Jean to Southside Junction and to WV Route 25/2 within the town itself"."

**Response.** Additional information about road improvements needed is documented in the GMP table 4.30 (pages 4-282 and 4-283) and in table 4.31 (page 4-284). The GMP text notes that the NPS would continue to work with the WV DOH on several known projects (see table 4.31). A continuous effort will be made to maintain or improve the park's roadways for visitor enjoyment. Any projects with the potential for adverse impacts to park resources and not addressed in the GMP will be further evaluated and appropriate federal and state agencies consulted prior to any work being completed.

**Topic: Park Access – Agency Coordination**

**Comment.** One commenter suggested working closely with the WV DOH to improve access to upper Glade Creek and McKendree Road.

**Representative Quote.** "One suggestion I have is for the management to work closely with the state of WV and get them to make improvements to the upper access to Glade Creek and to McKendree Road."

**Response.** The NPS agrees and is currently working with the Federal Highway Administration and the WV DOH on improvements to these and other roads throughout the park.

**Topic: Park Access – Vehicle Access from Thurmond to Hawks Nest**

**Comment.** Two commenters suggested a need for enhanced vehicular access from Thurmond to Hawks Nest.

**Representative Quote.** "Address the need for increased and improved vehicular access from Thurmond to Hawks Nest."

**Response.** The GMP recommends many different improvements to the road network that would enhance rim to river access from Thurmond to Hawks Nest (see table 4.31 – Alternative 5 – Access Changes Needed to Achieve Desired Conditions in Visitor Use Areas (pages 4-284 and 4-285)).

**Topic: Park Boundary Modification**

**Comment.** Two commenters suggested expanding the park boundary and acquiring all private land within the boundary.

**Representative Quote.** "The most important issue in my mind is to expand the park land to include all private land within the purchase boundary. All land over 3,000 feet should be protected. Also add any additional land that has been recommended in the planning report."

**Response.** NPS will continue to acquire land from willing sellers, as funding is available.

**Topic: Park Significance - Whitewater**

**Comment.** Several commenters suggested that the NPS should add another park significance statement.

**Representative Quote.** Foundation Plan, pages 5 to 6, Park Significance. "Add a 7<sup>th</sup> statement to read, "The New River Gorge provides one of the finest whitewater recreational experiences in the United States"."

**Response.** Park significance statement 6 – referencing the park's exceptional opportunities for exploration, adventure, discovery, solitude, and community – is intended to encompass opportunities for all existing significant recreational uses occurring in the gorge, as well as opportunities for recreational activities that do not presently occur there but that could occur in the future. The fundamental resources and values related to significance statement 6 include "the experience and enjoyment visitors derive from the direct interaction with the outstanding scenic, natural, and cultural resources through a variety of recreational activities" (see table 1.1, statement 6, page 1-13). As noted in the Foundation Plan, Visitor Opportunities, Importance, bullet 3 (page 56) opportunities for whitewater recreation are

among the recreational activities that currently occur within the park that are of national importance.

### **Topic: Park Significance – American Indians**

**Comment.** One commenter expressed concern that none of the park significance statements mention either prehistoric or historic American Indians. The commenter suggests that this neglects a significant component of NERI's collection of historic places and that an additional significance statement be added. The commenter also suggests under primary interpretive themes and the theme title "A Rugged Land, A Rugged People", altering the first bullet to reflect the importance of prehistoric cultures and American Indian cultures to the history of the New River Gorge area.

**Representative Quote.** Foundation Plan, page 14, bullet 3, A Rugged Land A Rugged People. "Revise statement to read, New River Gorge National River contains significant prehistoric archeological features, historic cultural landscape characteristics, and relic plant populations representative of the activities of diverse prehistoric cultures and historic American Indian cultures that drew sustenance from the abundance of natural resources found in the gorge vicinity for at least 13,000 years."

**Response.** The history and stories of Native Americans are important to the park and American Indian sites are protected and Native American stories are told. The history and archeology associated with the park's Native Americans are recognized as one category of Other Important Resources and Values related to park significance statement 4 (see Foundation Plan, page 10 and GMP page 1-13, table 1.1, statement 4, Other Important Resources and Values, bullet 3). The NPS does not believe that Native American resources are fundamental to the reasons for which the park was created. However, they are important and valued resources that are integral to the management of all NPS lands where they occur and the interpretation of them will be included in the park's interpretive programs.

### **Topic: Resource Management – Viewshed Protection**

**Comment.** Three commenters suggested that the park should seek a boundary expansion and additional land acquisition to protect the viewshed.

**Representative Quote.** GMP, page 1-21, Protecting Scenic Resources in and around the gorge. "Development that would affect the viewshed is a continuing threat to the park. As adequate protection is not being provided by Fayette County, the NPS should expand park boundaries and increase land purchases."

**Response.** The NPS has analyzed the need for a boundary adjustment and land acquisition to protect scenic resources in and around the gorge in a separate boundary study conducted

concurrent with preparation of the new GMP. GMP appendix E, Boundary Adjustment Study, presents in detail the findings and recommendations from this analysis. The GMP also summarizes the study's findings in the Summary – Boundary Adjustments (page vi) and in section 1.12 – Park Boundary Adjustment (pages 1-41 and 1-42). Study findings concluded that it would be impracticable – because of community impacts and costs – to adjust the park boundary to protect the scenic resources in and around the gorge that are critical to fulfilling the park's purpose. In lieu of boundary adjustments and land acquisition the NPS will seek to protect the park's scenic resources from impacts of new development on lands in and around the gorge by working with communities and private landowners.

**Topic: Threatened and Endangered Species – Extirpated Species**

**Comment.** WV DNR asked for clarification as to which extirpated species might be restored.

**Representative Quote.** GMP, page 1-20, Maintaining Natural Processes and Restoring Natural Systems, paragraph 2, item 5. "We are interested in knowing which extirpated species the NPS seeks to restore."

**Response.** *NPS Management Policies 2006*, section 4.4.2.2 states, "The Service will strive to restore extirpated native plant and animal species to parks whenever all of the following criteria are met:

- Adequate habitat to support the species either exists or can reasonably be restored in the park and if necessary also on adjacent public lands and waters; once a natural population level is achieved, the population can be self-perpetuating.
- The species does not, based on an effective management plan, pose a serious threat to the safety of people in parks, park resources, or persons or property within or outside park boundaries.
- The genetic type used in restoration most nearly approximates the extirpated genetic type.
- The species disappeared or was substantially diminished as a direct or indirect result of human-induced change to the species population or to the ecosystem.
- Potential impacts upon park management and use have been carefully considered."

This statement is included within the agency's Management Policies 2006 to enable the NPS to restore native species that may become locally extirpated. For example, it is conceivable that if white-nosed syndrome were to locally extirpate one of the park's native species of bats, restoration efforts might be needed.

### Topic: Visitor Facilities – Through Park Trail

**Comment.** Two commenters supported a through the park "trail" free of motor vehicles.

**Representative Quote.** "We feel strongly that a through the park "trail", that is free of motor vehicle traffic, is needed to provide an enjoyable, safe, and primitive recreational experience."

**Response.** The idea for the through the park connector is to provide – at a minimum – a route linking portions of scenic roads and trails along the length of the park. However, in the long-term, the NPS is committed to developing additional segments of trail and maximizing the extent of trail limited to hiking/biking only to create a through the park trail. The feasibility of this concept depends on land ownership, terrain, resource issues, and funding.

### Topic: Visitor Facilities – Loop Trails and Trails to Communities

**Comment.** One commenter suggested that the park develop a system of loop trails and connections to nearby communities.

**Representative Quote.** "...the park should also plan and allow for the construction of complementary trails that as a system are connected so as to encourage park users to complete a loop experience when hiking or biking. This is especially desirable as it relates to the through the park trail experience. Connecting trails should form loops that allow users to hike/bike up one side of the river and back on the other or, to travel along the river and back along the cliff line. In addition, access trails into the park from nearby communities, state/municipal parks and other area attractions are needed."

**Response.** The NPS concurs and the GMP includes a future trail system concept plan that incorporates many of the commenter's recommendations (see figure 2.12 (following page 2-146) and section 2.8.2 – Visitor Use and Visitor Facilities (Alternative 5 – Preferred Alternative), Hiking and Equestrian Use (pages 2-143 to 2-145) and Biking (pages 2-145 and 2-146)). The NPS will begin a study in late 2010 to further develop this idea.

### Topic: Visitor Facilities – Rim to River Trails

**Comment.** One commenter suggested the need for an additional rim-to-river trail near the National Scout Reserve.

**Representative Quote.** "The preferred alternative identifies several rim to river trail experiences throughout the park. Although there is a rim to river trail identified for the area between Mount Hope and Southside Junction, we feel that a rim to river trail is needed that 1) does not rely on CSX abandonment of the rail line to Mount Hope and 2) is located in the vicinity of the National Scout Reserve at Garden Ground."

**Response.** The NPS is currently developing plans for a new stacked loop hiking and biking trail at Craigs Branch and Garden Ground, in the vicinity of the National Scout Reserve. In the future, as noted in section 2.13.1 Trail Management Plan (page 2-177), further development and management of the park's trail system will occur in accordance with a new trail management plan that the NPS will prepare following completion of the GMP/EIS. The new trail plan will address additional potential trails such as the commenter suggests.

**Topic: Visitor Facilities – Glade Creek Trail**

**Comment.** Two comments supported the use of bicycles on the Glade Creek Trail.

**Representative Quote.** "I feel the Glade Creek trail should be opened to mountain biking as soon as possible. I feel that if this trail were opened it would be primarily used by families and recreational mountain bikers."

**Response.** The NPS concurs. As noted in the GMP, the actions needed to achieve desired conditions in the Glade Creek area include opening the Glade Creek Trail to biking (see table 2.32 (page 2-162) under Glade Creek, Examples of Changes Needed, 3rd bullet).

**Topic: Visitor Facilities – Additional Camping**

**Comment.** Two commenters suggested the need for additional camping throughout the park.

**Representative Quote.** "Provide additional camping access from Hinton to Hawks Nest."

**Response.** The NPS agrees that there is a need for additional camping in the park. Alternative 5 (preferred alternative) includes a variety of new camping experiences that will address this need (see Other Visitor Facilities, pages 2-148 and 2-149). Additional camping facilities – subject to available funding – will include: new developed campgrounds at Bass Lake (if and when the site can be acquired from a willing seller), Meadow Creek, Terry Beach (if and when the site can be acquired from a willing seller), and Burnwood; improvements to existing primitive campgrounds at Glade Creek, Mill Creek, Grandview Sandbar, and Army Camp; and, several groups of designated backcountry campsite along the Through Park Connector and along the Dowdy Creek Highland Mountain Trail.

**Topic: Visitor Facilities – Paddle-In Camping**

**Comment.** One commenter suggested a need for paddle-in camping facilities.

**Representative Quote.** "I suggest developing "paddle in camping" that can be situated at different sections of the river where the park service need only to designate areas to camp, provide dry toileting facilities and trash containers where boaters either by raft,

kayak or canoe could have adequate primitive camping facilities, waste products like human excrement and camping trash could be properly disposed of and only the park service would have road/atv/utv access to maintain."

**Response.** In the future, as noted in section 2.13.2 Camping Management Plan (page 2-178), further development and management of camping in the park will occur in accordance with a new camping management plan that the NPS will prepare following completion of the GMP/EIS. The camping management plan will determine the need for and suitability of developing boat-in campsites, such as the commenter suggests. Existing and established riverfront campsites will be evaluated for continued use. Not all boat-in campsites will be vehicle accessible and appropriate methods for trash/waste removal will need to be identified.

### **Topic: Visitor Facilities – River Access in the Prince Area**

**Comment.** One commenter suggested that the NPS should develop a large commercial river access in the Prince area.

**Representative Quote.** "Also build a large commercial access in the Prince area."

**Response.** Development of a commercial river access in the Prince/Quinnimont area (on river right) is not possible due to the location of the CSX Mainline along which frequent freight and coal trains move through the park each day. The need for river access in the Prince vicinity will be met by the existing river access at McCreery (on river left) and by a new major river access at Terry Beach (on river left), just downstream of Prince (see new river access improvements listed on page 2-149, third paragraph). The Terry Beach river access will be developed once funding is available and the site can be acquired by the NPS from a willing seller.

### **Topic: Visitor Facilities – Fayette Station Private Boater River Access**

**Comment.** Six commenters suggested that boaters who park in the upper parking lot at Fayette Station need a safe way to access their vehicles after they get off the river.

**Representative Quote.** GMP, page 1-23, Pedestrian Access across Railroad Rights-of-Way and page 1-43, Fayette Station. "The NPS should pursue means to allow pedestrians to cross the railroad tracks at grade to access parking for boaters at Fayette Station. Landowner liability laws should be researched to develop an appropriate state or federal law. (See VA Code 29-1-509)."

**Response.** The NPS agrees with these comments and is working with the state, private paddlers, outfitters, and the CSX Corporation to secure safe access across railroad rights-of-way at several locations in the park. Priorities for securing legal crossings are where visitors

frequently cross the tracks to get to the river (see page 2-56 under Pedestrian Access across Railroad Rights-of-Way). In addition, in alternative 5 the NPS would seek legal crossings to access land where a campground could be developed at Terry Beach and to access the river from a new rim-to-river trail from GW Carver to Keeney Creek (see page 2-146 under Pedestrian Access across Railroad Rights-of-Way).

**Topic: Visitor Safety – Cunard River Gauge**

**Comment.** Six commenters requested the installation of a river gauge at the Cunard river access.

**Representative Quote.** "A river gauge is needed at the Cunard access area. The gauge would help boaters understand the current level and flow (feet and cfs) of the river when they are launching to run from there to Fayette Station."

**Response.** The NPS is currently working to determine the best solution for this request, independent of the GMP planning process.

**Topic: Visitor Safety – Automated External Defibrillator (AED) Access on the River**

**Comment.** One commenter requested AED access on the river.

**Representative Quote.** "...is there a plan to have AED access on the river? ... at the minimum, have park service boats that already carry first aid equipment carry an AED. Professional guides and park service personnel will only need to get certified for their use, and this can be combined with their CPR certification."

**Response.** The NPS River Rangers carry AEDs on river patrols, along with first aid supplies, oxygen, river rescue gear, backboards, and radios, which ensure quick coordination with local EMS and search and rescue organizations. The EMS and search and rescue organizations that have mutual aid agreements with the NPS also typically carry AEDs when responding to calls (see page 3-99, table 3.45, Emergency Service Providers).

**Topic: Visitor Use – ATVs/Personal Watercraft**

**Comment.** Two commenters suggested that the park should lift restrictions on the use of ATVs and personal watercraft within the park.

**Representative Quote.** "Lift restrictions on ATV use within the park, as well as personal watercraft."

**Response.** 36 CFR section 4.10 specifies that routes and areas for use of off-road motor vehicles may only be designated in national recreation areas, national seashores, national lakeshores, and national preserves. Because it does not specify areas designated as national rivers, it is not possible to permit the use of ATVs at New River Gorge National River.

*NPS Management Policies 2006*, section 8.2.3.3, notes that personal watercraft use is generally prohibited by 36 CFR 3.24. However it may be allowed within a park by special regulation if it has first been determined through park planning to be an appropriate use that will not result in unacceptable impacts. The New River Gorge National River would require additional special studies to determine whether the impacts to visitors and resources would be acceptable and whether to pursue a special regulation.

### **Topic: Wildlife Habitat – Documentation of Maple/Beech/Birch Forest Type**

**Comment.** WV DNR questioned the occurrence of the maple/beech/birch forest types.

**Representative Quote.** GMP, page 1-34, Climate Change. "Climate models suggest that one of the region's major forest types, maple/beech/birch, is very likely to be completely displaced by more southern forest types. The maple/beech/birch forest is more typical of higher elevation than what is found on the NRGNR. We recommend occurrence of the community be documented with a citation."

**Response.** The GMP states that one of the region's major forest types, maple/beech/birch, is very likely to be replaced with southern forest types. Even though, this exact forest type is not present in the park, several close associations are present and all three genus are very common in the park.

### **Topic: Wildlife Habitat – Impacts of Hunting**

**Comment.** WV DNR challenged the findings of a study as reported by the researcher.

**Representative Quote.** GMP, page vii, Hunting in the Park, Paragraph 2. "Hunting in accordance with applicable state regulations has not caused adverse effects on any of the species of mammals or birds that..."

Interestingly, the wildlife populations that existed on the area now known as New River Gorge National River are a direct result of state management. Not only have wildlife species "not been adversely affected," they have thrived under the biologically determined seasons and bag limits. We suggest that, instead of begrudgingly admitting that hunting has not hurt anything, the NPS eliminate the bias and embrace the fact that well regulated hunting is a good thing."

**Response.** The findings of the study are as they were reported by the researcher. Also, please note that the wording used to summarize findings is directly in response to requirements of *NPS Management Policies 2006*. Section 4.4.3, Harvest of Plants and Animals by the Public (paragraph 2) states, "Where harvesting is allowed and subject to NPS control, the Service will allow harvesting only when...(2) the Service has determined that the harvesting will not unacceptably impact park resources or natural processes, including the natural distributions, densities, age-class distributions, and behavior of harvested species, native species that the harvested species use for any purpose, or native species that use the harvested species for any purpose."

**Topic: Wildlife Habitat – Hunting Safety Zones**

**Comment.** WV DNR asked for clarification of figure 1.2 and the areas within the park open to hunting.

**Representative Quote.** GMP, page 1-8, figure 1.2. "This figure indicates that hunting is currently allowed in certain designated areas delineated in purple stippling. Contrary to statements from park staff who indicated most of the park is open for hunting, we find there is a significant amount of NPS-owned land not designated as huntable, seemingly without justification. Concern has been raised that safety zones may eliminate acreage from hunting. We strongly encourage NPS to assess levels of conflict prior to making spontaneous decisions. Some boundaries appear to be arbitrary straight lines that often cross the middle of owned parcels. It appears at least some of those boundaries do not follow roads, streams, etc. and we would be interested in the basis for their delineation."

**Response.** The intent of figure 1.2 is to identify the areas in the park where visitors currently are most likely to experience various activities. The areas delineated in purple show areas where visitors currently hunt most frequently. Figure 1.2 does not identify all areas open to hunting nor does it identify the few safety zones in the park that are closed to hunting.

**Topic: Wildlife – Neotropical Migratory Birds**

**Comment.** WV DNR asked for clarification regarding how canopy gaps for the golden-winged warbler might be created and maintained.

**Representative Quote.** GMP, page 3-29, Neotropical Migratory Birds. "The golden-winged warbler is listed as a bird that occurs in the New River Gorge that is on the Partners in Flight (PIF) watch list. It is mentioned that one hectare (ha) canopy gaps are necessary to maintain the golden-winged warbler. To document the means of achieving long-term positive support of neotropical migrants such as the golden-winged warbler, we recommend NPS describe how one hectare canopy gaps will be created and

maintained in the scrub-shrub stages of succession that the golden-winged warbler needs."

**Response.** The NPS would rely on natural gap dynamics and has no active management plans to maintain canopy gaps.

## 2.3 Non-Substantive Comments Requiring Clarification and Text Change

### Topic: Aquatic Wildlife – Changes to Abundance List

**Comment.** WV DNR suggested adding rock bass to the list of common fish in the New River.

**Representative Quote.** GMP, page 3-22, Aquatic Wildlife, Fish, paragraph 2, line 1.  
 "We are not sure the species specific overall abundance data presented is totally correct. Several game fish species are not listed and should be fairly common, i.e., rock bass which should be more common than either channel or flathead catfish."

**Response.** NPS annual long-term monitoring indicates rock bass (*Ambloplites rupestris*) to be one of the most common fish in the New River. The GMP has been changed via errata (see section 3.0 below) (page 3-22) to correct this oversight.

### Topic: Aquatic Wildlife – Rudd in the New River

**Comment.** WV DNR questioned the presence of Rudd within the New River.

**Representative Quote.** GMP, page 3-23, paragraph 1, last sentence. "We have no documented occurrences of a Rudd (Scandinious spp.) within the New River or within West Virginia that we know of. The citation is based on suspect data from 1991 that has never been verified. Neither the NPS nor the WV DNR have documented Rudd from the New River."

**Response.** Rudd was collected and identified by researchers from Virginia Tech, who published the results in a peer-reviewed journal. The NPS has not collected this fish in our annual long-term monitoring of the same site where the Virginia Tech specimens were collected, so it is likely that the occurrence represented a one-time bait-bucket introduction. Due to the transitory nature of this species in the park, the NPS has deleted this reference in the GMP via errata (see section 3.0 below) (page 3-23).

**Topic: Aquatic Wildlife – Black Bass Catch and Release**

**Comment.** WV DNR pointed out that catch and release regulations also apply to spotted bass.

**Representative Quote.** GMP, page 3-23, paragraph 4, last sentence. "The catch and release regulation applies to all black bass species so spotted bass should be included."

**Response.** The GMP has been changed via errata (see section 3.0 below) (page 3-23) to correct this oversight.

**Topic: Aquatic Wildlife – Brook Trout**

**Comment.** WV DNR suggested that brook trout in Buffalo Creek are self-sustaining.

**Representative Quote.** GMP, page 3-24, paragraph 1, line 6. "The population of brook trout in Buffalo Creek is self-sustaining and not apparently self-sustaining. Mill Creek should also be added to this statement."

**Response.** We do not have data to corroborate the assertion that the Mill Creek and Buffalo Creek brook trout populations are self-sustaining. Given the massive and extensive channel alteration that occurred in Buffalo Creek during the 2001 floods, and the catch-and-release nature of the fly-fishing only regulations, we are concerned about whether the Buffalo Creek population is of a viable size. The GMP has been changed via errata (see section 3.0 below) (page 3-24) to reflect WV DNR's assertion, while including our concerns.

**Topic: Aquatic Wildlife – Brown Trout**

**Comment.** WV DNR pointed out that the brown trout population in Lower Glade Creek is not self-sustaining but instead is maintained by annual stocking.

**Representative Quote.** GMP, page 3-24, paragraph 1, line 8. "It is believed? – The brown trout population within Glade Creek is not self-sustaining and is supported by annual stocking of fingerling brown trout."

GMP, page 3-83, Fishing Overview, paragraph 1, line 3. "The brown trout population in lower Glade Creek should not be considered self-sustaining. It is usually stocked on an annual basis with fingerling brown trout and some trout from the put and take section move downstream into the catch and release area. Additionally, natural reproduction has been verified in Buffalo Creek."

**Response.** The GMP has been corrected via errata (see section 3.0 below) by deleting the last sentence in paragraph 1, page 3-24 and by rewriting the sentence on page 3-83

(replacing "has an apparently self-maintaining population of" with "is usually stocked on an annual basis with fingerling)."

**Topic: Aquatic Wildlife – Walleye**

**Comment.** WV DNR suggested adding walleye to the native fishes list.

**Representative Quote.** Foundation Plan, page 20, Current State and Related Trends.  
"Add Walleye (*Stizostedion vitreum*) to the native fishes list."

GMP, page 3-23, Gamefish, paragraph 1, line 8. "Native game fish species should also include the native strain of walleye as documented by recent studies."

**Response.** Information on status of fish species is based on "The Fishes of Virginia" (see GMP for citation of Jenkins and Burkhead 1994), the most comprehensive work available on the origin of fishes in the New River drainage system. We are aware that recent research has revealed a unique population of walleye in the upper New River in Virginia that some scientists presume may be native. The GMP has been changed via errata (see section 3.0 below) (page 3-23) to reflect this information and appropriate citations have been added to the GMP list of references (see section 3.2 below).

**Topic: Aquatic Wildlife – Non-Native Impacts to Native Species**

**Comment.** WV DNR questioned the effects of non-native fishes on the native fish species.

**Representative Quote.** Foundation Plan, Current State and Related Trends, page 20.  
"There are a number of inferences that non-native fish probably led to decreases in native species diversity, etc. These statements should either be corroborated with data literature or removed from the document as they are anecdotal."

**Response.** The often deleterious impacts of introduced non-native fishes on the native fish fauna are well documented. The Foundation Plan does not contain a bibliography, but appropriate citations have been added to the GMP via errata (see section 3.2 below).

**Topic: Aquatic Wildlife – Impacts of Bait Dumping**

**Comment.** WV DNR requested additional citations to support the concern that the dumping of bait buckets has introduced nonnative crawfish to the New River.

**Representative Quote.** GMP, page 3-26, paragraph 2, line 1. "We know of no bait dealers that buy crayfish from sources significantly outside of the general area and it is our understanding that most, if not all, are caught and sold by local bait dealers. Data

demonstrating that escaped or dumped bait stocked by the river should be identified and cited."

**Response.** Surveys of crayfish in the New River system indicates that a number of non-native species have become established in the last few years. The general consensus among crayfish experts is that these new species became established through bait-bucket introductions, as has been shown in a number of other locales across North America (Taylor et al. 1996; Lodge et al. 2000; Olden et al. 2006). Whether these introductions came from local bait dealers being supplied from out of the area or from anglers returning from other areas is unknown. However, now that the non-natives are established, bait-dealers buying and selling locally-collected specimens are likely contributing to the continuation of the problem. The above citations have been added to the GMP list of references via errata (see section 3.2 below).

#### **Topic: Aquatic Wildlife – Impacts of Non-Native Crayfish**

**Comment.** WV DNR pointed out an incomplete sentence and requested clarification.

**Representative Quote.** GMP, page 3-26, paragraph 2, line 3. "Because this is an incomplete sentence, we are unsure of the intent. Within the discussion of non-native crayfish, we are unaware of the smallmouth bass being discriminatory; however we would be interested in an elaboration of research demonstrating that behavior or quantifying the perceived threats of these non-natives."

**Response.** This sentence has been rewritten for clarity via errata (see section 3.0 below) (page 3-26). It now states, "At this time it is not known what influence the expanded dominance of introduced crayfish is having on fish (including smallmouth bass) diets and other components of the New River ecosystem."

#### **Topic: Aquatic Wildlife – Black Fly Larvae and Bti**

**Comment.** WV DNR was concerned with properly identifying the West Virginia state agency responsible for Bti spraying and clarifying whether black fly larvae serve as a food source.

**Representative Quote.** Foundation Plan, page 20, Hydrologic – Aquatic Ecosystem, Current State and Related Trends, bullet 3. "There is a need to attribute the spraying of Bti to the WV Department of Agriculture to identify the State agency that administers the program and applies the pesticide."

GMP, page 3-25, Black Fly Larvae. "The statement that black fly larvae are an important food source for smallmouth bass should be documented as to the source of this information."

GMP, page 3-25, Bti Application, line 4. "We are unaware of adult smallmouth bass feeding on black fly larva and are unsure if this is a reference to young of the year bass. If it is the former, a citation should be provided documenting the statement. Our data indicate robust populations of smallmouth bass throughout the river and we have no evidence of negative impacts of Bti spraying on the game fish that we monitor."

**Response.** West Virginia's application of Bti is now housed in the Department of Agriculture.

Black fly larvae are important food sources for many aquatic predators. The GMP has been changed via errata (see section 3.0 below) (page 3-25) to reflect this fact.

### **Topic: Aquatic Wildlife – Number of Outfitters**

**Comment.** WV DNR wanted a more specific estimate of the number of outfitters providing services to anglers.

**Representative Quote.** Foundation Plan, page 20, Stakeholder Interests, bullet 4.  
"How many are a handful? This statement needs to be more precise when referring to the number of outfitters."

**Response.** Since the number of outfitters varies as participants in the business merge, quit, and start, an accurate number would only be a "snapshot" in time. According to WV DNR Licensed Hunting and Fishing Guides 2009, fourteen companies are identified, of which eleven seem to be regular operators on the New River within the park, and three do not.

### **Topic: Cultural Resources – Historic Contexts**

**Comment.** One commenter proposed adding a sixth historic context dealing with the 1670-1780 period of American Indian occupation.

**Representative Quote.** GMP, page 3-36, table 3.5. "However, there is one very significant context missing – the 1670 to 1780 period of American Indian occupation. I propose that a sixth historic context be added to the GMP and it could be written something like this:

Historic American Indian Occupation/Struggle for Livelihood Historic Context in the park. During the eastern "Indian Wars" of the early 1600s in the southern English colonies, many American Indian peoples were displaced from traditional lands, westward towards the Allegheny Mountains and beyond...."

**Response.** The historic contexts of the park have been established through historic resources studies. At this time, the NPS has no plans to add a sixth context; however, we

have edited the GMP via errata (see section 3.0 below) (pages 3-34 and 3-35) to clarify and expand the description of contact period American Indian experience.

**Topic: Cultural Resources – Historic Communities**

**Comment.** One commenter pointed out a typographical error on page 3-42 of the GMP.

**Representative Quote.** GMP, page 3-42, Euro-American Settlement/Agriculture Development in the Park, second paragraph, first sentence. "The text states that, "One of the first recorded settlements within the park boundaries was Bowyers Ferry established [sic] in 1978 at the confluence of the New River and Manns Creek [?]".... I question the date."

**Response.** The date has been edited via errata (see section 3.0 below) (page 3-42), replacing 1978 with 1798.

**Topic: Cultural Resources – Ethnographic Resources Gaps in Knowledge**

**Comment.** One commenter suggested changes to the stated focus of additional traditional use studies that are needed to better understand the park's ethnographic resources.

**Representative Quote.** GMP, page 3-59, Ethnographic Resources, Gaps in Knowledge. "I suggest altering one bulleted comment:

- subsistence practices by the traditional American Indian and EuroAmerican populations that continue to harvest natural resources for subsistence purposes

Remember that almost all knowledge of local plant and animal uses, as well as many common practices, were contributed to the mountain culture by the ancestors of the American Indians and métis who are still part of that culture."

**Response.** The GMP has been edited via errata (see section 3.0 below) (page 3-59) to read, "subsistence practices by the traditional American Indian and EuroAmerican populations..."

**Topic: Cultural Resources – Cultural Landscapes**

**Comment.** One commenter suggested the addition of a cultural landscape based on an 18th century American Indian complex.

**Representative Quote.** GMP, page 3-51, Cultural Landscapes. "Surely the cultural complex made up of (1) the American Indian village site just above Sandstone Falls on the east side of the river, (2) the trail that led from the falls westward, (3) the trail that led up Lick Creek, past, (4) the frequently occupied prehistoric Indian camp at Green

Sulphur Springs, (5) the fording places at Sandstone and above the falls, (6) Chestnut Mountain, (7) the Indian meadows of Meadow Creek, (8) the trails from the confluence of Greenbrier and New Rivers westward and eastward, and (9) the Indian fields at Broomstraw Ridge constitute a cultural landscape worthy of further research and interpretation. Although some of these historic landscape features do not lie within the park boundary, their close proximity to and association with those features that do, provide opportunities for interpreting protohistoric and historic Indian experiences within a relatively short stretch of New River accessible on each side of the river by roadway. There may be other similar complexes of 18th century American Indian cultural landscapes worthy of study and interpretation within the park."

**Response.** The GMP has been changed via errata (see section 3.0 below) (page 3-52) to reflect gaps in knowledge regarding American Indian cultural landscapes within the park.

**Topic: Exotic Species – Insects/Disease Impacts on Plants**

**Comment.** WV DNR questioned the effects of the gypsy moth.

**Representative Quote.** GMP, page 3-20, Exotic Insects and/or Diseases, first paragraph. "Oak mortality by gypsy moth is likely to increase oak regeneration because of the increase in sunlight hitting the forest floor. It remains to be seen, however, if initial regeneration will survive to tree stage. Gypsy moth-caused oak mortality has increased in West Virginia in recent years. The WV Division of Forestry could have accurate figures on the number of acres impacted. In addition, we have found gypsy moth egg masses in Beury Mountain WMA, which borders the New River Gorge. The other two major insect threats to the New River Gorge are the emerald ash borer and the hemlock wooly adelgid."

**Response.** The GMP has been changed via errata (see section 3.0 below) (page 3-20) to revise the paragraph describing the gypsy moth and to include a paragraph describing the emerald ash borer.

**Topic: Exotic Species - Kudzu**

**Comment.** WV DNR suggested that the abundance of kudzu is not pervasive but persistent.

**Representative Quote.** GMP, page 3-21, Invasive Plants, fourth sentence. "Kudzu is not pervasive in the park. It is most likely limited to a few disturbed sites where it was introduced for ground stabilization. Kudzu is currently declining at these sites in response to control efforts. It does not appear to invade natural communities in the park, but this could change in the future."

**Response.** The GMP has been changed via errata (see section 3.0 below) (page 3-21) to replace "pervasive" with "persistent" to describe kudzu populations in the park. An additional sentence has been added to address several other non-native species, including honeysuckle, autumn olive, and multiflora rose.

#### **Topic: Miscellaneous Topic – Private Property Acquisition**

**Comment.** One commenter asked for a clarification of the term "friendly condemnation".

**Representative Quote.** "There is no clear definition of "friendly condemnation" and I consider such terminology an oxymoron and most misleading to the public!"

**Response.** The term "friendly condemnation" was used in table A.1 of the GMP and also on page 62 in the Foundation Plan in the summary of park legislation. A "friendly condemnation" occurs when a landowner is willing to sell their property but cannot deliver good title, so a condemnation action is used to clear title. In such situations, the landowner receives their money and the United States assumes the litigation costs and the burden of searching for and notifying any potential claimants. In a private sale, if a landowner has a defect in their title, they have the burden of clearing the title themselves. Specifically, PL 100-446 (see page A-17 of the Foundation Plan) states, "...the Secretary may initiate condemnation with the consent of the owner of property, improved or unimproved, within the boundary or at a currently authorized administrative site of the New River Gorge National River, West Virginia." The text will be clarified and strike the use of "friendly condemnation".

The GMP describes the Land Protection Priorities and Stewardship of Private Land Remaining within the Park Boundary in sections 2.8.6 (pg. 2-150) and 2.4.7 (pages 2-61 to 2-63). The NPS would focus on working with willing sellers while acquiring properties with the highest priorities and working cooperatively with owners of private lands to promote sensitive stewardship.

#### **Topic: Miscellaneous Topic – Correct Citation**

**Comment.** WV DNR identified a typographical error.

**Representative Quote.** "Vanderhorst is misspelled throughout the document."

**Response.** The GMP has been changed via errata (see section 3.0 below) (pages 3-16 through 3-21) to correct the spelling of Vanderhorst. The Foundation Plan has been changed via errata (see section 3.4 below) (page 32) to correct the spelling of Vanderhorst.

### Topic: Park Access – Fish Stocking

**Comment.** WV DNR wanted clarification of the potential for fish stocking along Glade Creek.

**Representative Quotes.** GMP, page 1-49, Glade Creek Area, first paragraph, third sentence. “This (*i.e.*, *elimination of vehicles from the I-64 bridge service road*) will eliminate trout stocking by the Glade Pinch Trout Association using a pick-up truck and a hauling tank. They travel this road approximately seven times each year and cause minimal, if any, impact. The “road” is actually an abandoned railroad grade used during early logging operations. We oppose its elimination.”

GMP, page 1-49, Glade Creek Area, second paragraph, first sentence. “...“Except for WV DNR approved stocking vehicles” should be added to this sentence.”

**Response.** The Glade Creek hiking trail, formerly the I-64 bridge service road, is closed to motor vehicles. However, the upper half of this trail is managed as an administrative road to permit the occasional use by NPS approved fish stocking vehicles. The GMP text has been clarified via errata (see section 3.0 below) (page 1-49).

### Topic: Park Significance – Cultural Resources

**Comment.** One commenter suggested minor text changes within the cultural resources section relating to Native American resources.

**Representative Quote.** Foundation Plan, page 43, Cultural – Places with Traditional Associations, Importance, first statement. “Statement should be altered thus: The park contains standing structures, ruins, landmarks, landforms, place names, and natural resources.”

Foundation Plan, page 43, Cultural – Places with Traditional Associations, Current State and Related Trends. “I suggest adding bullet:

- Historic American Indian occupation/struggle for livelihood”

Foundation Plan, page 43, Cultural – Historic and Archeological Resources, Applicable Laws and Policies, Management Direction. “Management Direction should “foster an appreciation and understanding of the history and archeology associated with the park’s pre-contact [DELETE] Native American resources”.”

**Response.** The Foundation Plan text has been edited via errata (see section 3.0 below) as follows:

- page 43, bullet 1 under Importance now reads, “The park contains standing structures, ruins, landmarks, landforms, place names, and natural resources,...”.

- page 47, while bullet 3 under Importance does reflect a variety of landscape settings, the term "pre-contact" has been deleted as suggested from bullet 3 as well as from the statement listed under Management Direction.

### **Topic: Partnerships – Boy Scouts of America**

**Comment.** One commenter suggested the park should recognize the potential for a significant partnership with the Boy Scouts of America.

**Representative Quote.** GMP, page 2-152, section 2.8.7, Partnerships. "We feel this significant partnership and commitment has tremendous potential and should be recognized in the park's preferred alternative under Partnerships."

**Response.** The NPS recognizes the potential for a significant partnership with the Boy Scouts of America. The GMP text has been edited via errata (see section 3.0 below) (page 2-68) to reflect this suggestion.

### **Topic: Threatened and Endangered Species – Mammals**

**Comment.** WV DNR requested clarification of the status of the Allegheny woodrat.

**Representative Quote.** GMP, page 3-33, Federally Designated Mammal Species, first paragraph. "Allegheny woodrats are probably stable throughout most of West Virginia, not just in NERI. The U.S. FWS eliminated the Species of Special Concern classification."

**Response.** The GMP text has been edited via errata (see section 3.0 below) (page 3-33) to indicate that the Allegheny woodrat is a species that is under review for listing by the U.S. Fish and Wildlife Service.

### **Topic: Threatened and Endangered Species - Squirrel**

**Comment.** WV DNR pointed out the change in status of the northern flying squirrel.

**Representative Quote.** GMP, page 3-34, Federally Designated Mammal Species, second paragraph. "WV northern flying squirrel habitat is high elevation red spruce and northern hardwood forests, which do not occur in the NERI. The scientific name for West Virginia northern flying squirrel is *Glaucomys sabrinus*, subspecies *fuscus*. There is no such thing as a *Glaucomy volans fuscus*. This subspecies has also been delisted by the USFWS."

**Response.** The NPS concurs that the northern flying squirrel is delisted. The GMP text has been edited via errata (see section 3.0 below) (page 3-34) to delete the reference to the WV Gap Analysis Program.

### Topic: Threatened and Endangered Species – Flatrock Rare Plants

**Comment.** WV DNR requested clarification of the species included in the flatrock community.

**Representative Quote.** GMP, page 3-18, Rare or Significant Plant Communities, second paragraph. "There are no rare pines or cedars in this community, however, one state rare sedge is known. There are, however, some rare grasses and forbs: rare plants tracked by West Virginia Natural Heritage Program which have been documented in this community by past surveys include *Aristida purpurascens* var. *purpurascens* (arrowfeather threcawn), *Carex woodii* (pretty sedge), *Commelina erecta* var. *angustifolia* (whitemouth dayflower), *Coreopsis pubescens* var. *robusta* (star tickseed) (in ecotone with mowed field), *Galactia volubulis* (downy milkpea), *Hypericum virgatum* (coppery St. Johnswort), *Melica mutica* (twoflower meliegrass), and *Piptochaetium avenaceum* (blackseed speargrass)."

**Response.** The GMP text has been edited via errata (see section 3.0 below) (page 3-18) to read, "...is composed of cedars, pines, locally rare sedges, and other rare plants."

### Topic: Threatened and Endangered Species – Rare Species

**Comment.** WV DNR requested a clarification and update of the information presented with respect to threatened or endangered species.

**Representative Quote.** GMP, page 3-33, Federally Designated Plant Species, second and third paragraphs. "There are no "state-designated" plant species, although WV DNR does track distribution and status of selected rare species. According to Harman et al (2006), *Cardamine clematitidis* and *Cardamine flagellifera* are synonymous. WV DNR tracks *Cardamine flagellifera* and it is known from several floodplain sites in the park (not just Stone Cliff). According to Harman et al (2006) *Thalictrum steeleanum* is synonymous with *T. coriaceum*, which occurs at NERI, but which WV DNR does not track as rare."

**Response.** The NPS has reviewed several new databases and, following consultation with the WV DNR Heritage Program, has revised the GMP text in appendix F via errata (see section 3.0 below)(page 3-33 and pages F-4 to F-6).

### Topic: Threatened and Endangered Species – Species List

**Comment.** WV DNR provided several factual corrections to appendix F.

**Representative Quotes.** GMP pages F-4 and F-5, appendix F, table F-3, Species of Special Concern in West Virginia Known to Occur in New River Gorge National River Vascular Plants:

- *minima* dwarf anemone G5 S1 - *Anemone quinquefolia* var. *Minima/Eriogonum allenii* yellow buckwheat G4 S2  
Comment – “This is a shale barren endemic which is highly unlikely to occur in NERI (no shale barrens).”
- *Pinus resinosa* red pine G5 S1 -  
Comment – “NERI occurrences are planted and are not tracked as rare plant occurrences”
- *Emersum* water smartweed G5 T5 S2  
Comment – “*Polygonian Amphibium* var *emersum* water smartweed *Sibana virginica* Virginia cress G5 S2”
- *Spirea virginiana* Virginia spiraea S1 G2 threatened  
Comment – “Not known from NERI.”
- *Trifolium stoloniferum* running buffalo cloud S3 G3 endangered  
Comment – “Not known from NERI.”

**Response.** The NPS has reviewed several new databases and, following consultation with the WV DNR Heritage Program, has revised the plant list in GMP appendix F via errata (see section 3.0 below) (pages F-4 to F-6).

#### **Topic: Threatened and Endangered Species – Running Buffalo Clover**

**Comment.** WV DNR asked for clarification of the location of Running buffalo clover.

**Representative Quote.** GMP, page 3-33, Federally Designated Plant Species, first paragraph, last sentence (regarding Running buffalo clover). “This site is not in the park nor is this species known from the park.”

**Response.** The GMP text has been corrected via errata (see section 3.0 below) (page 3-33) to read that the Running buffalo clover located within New River Gorge at Cotton Hill is outside the park boundary.

#### **Topic: Visitor Facilities – New Trail Construction**

**Comment.** One commenter discussed the sustainability of trails.

**Representative Quote.** “We feel that new trails should be built in suitable areas where resource impacts can be minimized, while also providing for needed recreational opportunities as part of a planned and well designed trail system.”

**Response.** The NPS agrees that new trails will use existing routes, if possible, but that new trails must also be sustainable. The GMP text has been clarified via errata (see section 3.0 below) (page 2-144) to reflect this comment.

**Topic: Visitor Use – Endless Wall Area Day Use Only Restriction**

**Comment.** One commenter suggested removing the day use only restriction in the Endless Wall Area.

**Representative Quote.** "In the preferred alternative, visitor use in this area is limited to day use only. We feel this restriction is too limiting and we encourage the NPS to consider allowing additional access to this area to include primitive camping opportunities where safe and appropriate."

**Response.** The intent of the day use only restriction at Endless Wall, as well as the other forest areas identified in table 2.12, is to prevent camping in sensitive cliff areas. However, the Superintendent's Compendium already prohibits camping within 300 feet of the cliffs and makes the area-wide restriction unnecessary. The GMP text has been changed via errata (see section 3.0 below) (pages 2-70 and 2-71, table 2.12) to eliminate the day use restriction in the six forest areas listed in table 2.12.

Additional camping opportunities will be addressed in the Camping Management Plan.

**Topic: Visitor Use – Teays River Access**

**Comment.** One commenter suggested that the NPS acquire Teays River Access.

**Representative Quote.** "Teays Landing has informed the park both in writing and verbally that they would like to sell Teays Landing to the Department of the Interior. It is our belief that the purchase of this property would greatly help these issues. While there are other reasons, we believe the time has come for NRGNR to take over the ownership of Teays that has been in private hands since it was built in 1984."

**Response.** Teays Landing is an important river access located within the park boundary and, with willing sellers, would be a priority for acquisition. A bullet has been added to the GMP text via errata (see section 3.0 below) in table 2.12 (page 2-71) under Brooklyn to Hawks Nest, and Examples of Changes Needed, stating "acquire Teays Landing river access from willing sellers".

**Topic: Wildlife Habitat – Early Successional Habitat**

**Comment.** WV DNR expressed the need to create and restore early successional habitat.

**Representative Quotes.** GMP, page viii, first bullet. “We also support the creation and restoration of early successional habitat, but do not see the necessity of limiting it to “historic resource zones.” Some of the “back country” areas currently have early successional habitat which should be maintained for those species that require it (see comments on PIF species below) and the public who enjoys them.”

GMP, page 2-32, table 2.8, Parkwide Desired Conditions. “We recommend that additional planning attention be given to early-successional stage habitat and management. Currently, this management type is related to a sub-unit within the broader contiguous forest category. While we recognize that the park is predominantly forest and that this categorization makes sense, the decline of early successional habitat and the species that depend on it within this Bird Conservation Region warrants discussion on its own. Although forest fragmentation has had a deleterious effect on forest interior birds, populations of those species that depend on early successional stage habitat are in even worse condition within this region. Therefore we should not waste management opportunity where and when it is available, i.e., managing existing or easily manageable early successional openings, especially those that lie peripheral to the forest. Identification of suitable areas and management strategies could be developed as a stand-alone category.”

**Response.** *NPS Management Policies 2006*, section 4.4.2 Management of Native Plants and Animals, states:

“Whenever possible, natural processes will be relied upon to maintain native plant and animal species and influence natural fluctuations in populations of these species. The Service may intervene to manage populations or individuals of native species only when such intervention will not cause unacceptable impacts to the populations of the species or to other components and processes of the ecosystems that support them. The second is that at least one of the following conditions exists:

Management is necessary

- because a population occurs in an unnaturally high or low concentration as a result of human influences (such as loss of seasonal habitat, the extirpation of predators, the creation of highly productive habitat through agriculture or urban landscapes) and it is not possible to mitigate the effects of the human influences;
- to protect specific cultural resources of parks;
- to accommodate intensive development in portions of parks appropriate for and dedicated to such development;
- to protect rare, threatened, or endangered species;

- to protect human health as advised by the U. S. Public Health Service (which includes the Centers for Disease Control and the NPS public health service program);
- to protect property when it is not possible to change the pattern of human activities; or
- to maintain human safety when it is not possible to change the pattern of human activities.

Or,

Removal of individuals or parts thereof

- is part of an NPS research project described in an approved management plan, or is part of research being conducted by others who have been issued a scientific research and collecting permit;
- is done to provide plants or animals for restoring native populations in parks or cooperating areas without diminishing the viability of the park populations from which the individuals are taken; or
- meets specific park management objectives.

While we appreciate the reasons for which WV DNR is recommending the management of other areas as early successional habitat, this does not fit NPS management policies. To maintain an area as early successional habitat in this park in areas other than cultural resource areas would only be allowed by NPS policy if the agency was taking management action to protect rare, threatened, or endangered species.

The GMP text has been edited via errata (see section 3.0 below) (page 2-32) to delete the last bullet in table 2.8, Parkwide Desired Condition 10.

### **Topic: Wildlife Habitat – Mixed Mesophytic Term**

**Comment.** WV DNR suggested the need to clarify the mixed mesophytic forest description/significance.

**Representative Quote.** GMP, page 1-6, last paragraph, first sentence. "This portion needs editing: the expanse of forest that covers much of the gorge slopes is part of the largest remaining area of mixed mesophytic forest in the world. This would also need a citation (not Vanderhorst et al. 2007)."

**Response.** The NPS agrees that several text corrections are warranted. The GMP text has been corrected via errata (see section 3.0 below) (pages 1-6 and 3-15) and the Foundation Plan text has been edited via errata (page 28) to clarify the description/significance of the unfragmented mixed mesophytic forest within the park.

**Topic: Wildlife Habitat – Deer Overbrowsing**

**Comment.** WV DNR questioned whether deer over-browsing is the cause of the lack of oak regeneration.

**Representative Quote.** GMP, page 3-20, Deer Overbrowsing. "While anecdotally we might agree, there is no evidence cited or presented to indicate that deer over-browsing is causing the lack of oak regeneration in the New River Gorge. Oak is moderately shade tolerant. The lack of oak regeneration can be directly linked to a lack of canopy disturbances that create diffuse shade on the forest floor and the complete elimination of fire. Deer thrive in edge habitat created by forest management and agriculture. With the exception of the old farm areas that have been purchased by NPS, most of the New River Gorge would not be classified as "good" deer habitat."

**Response.** The GMP text has been edited via errata (see section 3.0 below) (page 3-20) to address deer browse impacts by including additional text and a reference citation.

**Topic: Wildlife Habitat – Natural Fire**

**Comment.** WV DNR sought clarification that most fire ignitions in the park are anthropogenic, not natural.

**Representative Quote.** Foundation Plan, page 28, Ecological – Unfragmented Forest, Current State and Related Trends, bullet 3. "There are few "natural" fires in this region of the national river. Ignitions are almost entirely anthropogenic."

**Response.** The NPS agrees that the absence of fire, whether natural or anthropogenic, may likely be negatively impacting rimrock plant communities and oak/hickory forests. The GMP text has been clarified via errata (see section 3.0 below).

**Topic: Wildlife Habitat – Need for Prescribed Fire**

**Comment.** WV DNR challenged the NPS summary of the Vanderhorst 2007 vegetation study.

**Representative Quote.** Foundation Plan, page 32, Ecological – Habitat Mosaic/Plant Communities, Quality and Comprehensiveness of Relevant Existing Information, last bullet. "If this refers to Vanderhorst et al. (2007), it is incorrect. This report did not identify the need for experimental prescribed burns."

**Response.** The Foundation Plan text has been rewritten via errata (see section 3.4 below) (page 32) to more accurately summarize the Vanderhorst (2007) vegetation study.

### **Topic: Wildlife Habitat – Fire-Dependent Ecosystems**

**Comment.** WV DNR requested additional documentation and citation with regard to the need for prescribed fire.

**Representative Quote.** GMP, page 2-46, Wildland Fire Management (alternatives 2 to 5), first paragraph. "Virginia pine is fire sensitive. It is doubtful whether xeric oak forests are fire-dependent – recommend documentation and inclusion of citation. Cliff-top pitch pine may be edaphic, not dependent on fire. Fire also has negative effects on "ecosystem health" including erosion, carbon emissions and other air pollution, etc."

### **Response.**

#### **Rimrock Pine Community**

The NPS is aware that the existing Virginia pine rimrock community is probably an edaphic climax species association as evidenced by the harsh site conditions created by thin soils and orientation of the cliff face. Throughout the Appalachian Mountains, edaphic pine and oak communities have persisted due to site factors. However, a major concern is the threat of decline due to the aging of the 80- to 100-year-old Virginia pines in the canopy, estimated during a recent study to be approaching senescence in about 10-15 years leaving any surviving cohorts to compete with a host of deciduous competitors. Virginia pine requires a disturbance, such as logging or fire, to regenerate. It is possible that other types of disturbances aided in the establishment and maintenance of rimrock pine communities in the New River Gorge. Mining operations and railroad construction occurred throughout the gorge in the 19th and early 20th centuries. However, it is unlikely that large portions of the rimrock forest were cut because of the poor quality of timber. Other events such as windthrow, ice storms, and insect outbreaks may have resulted in pulses of regeneration that coincided with the pine establishment following fires.

#### **Xeric Oak Forests**

There is considerable research into the fire history and fire regime of the oak forest of Appalachia, including studies within West Virginia, suggesting the importance of fire in shaping the forests of our region. One author stated: "Probably no other factor, other than the retreat of the ice age, has had more of an influence on the formation of the central hardwood forest, than Fire", (Hicks 1998).

New River Gorge forest species composition is changing, especially in the dry oak forest types, where the trees regenerating (trees of the future) are not the same species as those found in the overstory. Oak species compose a significant portion of the canopy trees, however, they are underrepresented in the sapling and seedling layers. In contrast, maple species compose a much larger portion of the sapling and seedling layers than is found in the canopy. Given these distributions, the park's dry forests will contain

fewer oaks, and more maples as these forests mature (Perles, et.al., 2010). A number of factors could be responsible for the poor oak regeneration including: dense shade from canopy or subcanopy trees; competition from shrubs, ferns, or grasses; altered disturbance regimes, including fire suppression; browse pressure from white-tailed deer; and/or soil infertility.

There is much uncertainty about the ecological ramifications of reintroducing fire to forests from which it has been absent for 80 years or more. The park's Fire Management Plan recognizes the need to study the fire history and fire regime of the New River Gorge prior to implementing large-scale prescribed burns. The plan recommends initiating no more than 10 experimental prescribed burns in the oak, oak-pine, and oak-hickory communities totaling 70 to 100 acres over the initial 5-year period. Individual burns would seldom exceed 20 acres. If results of research burns during the initial 5-year period confirm that prescribed burning is an appropriate management tool, further prescribed burning may be conducted to perpetuate select oak and pine communities.

**Topic: Wildlife Habitat – Fire-Dependent Ecosystems in River Corridor**

**Comment.** WV DNR questioned the presence of fire-dependent ecosystems in the river corridor zone.

**Representative Quote.** GMP, page 2-26, table 2.6, Management Zone Summary, River Corridor Zone. "There are no fire-dependent ecosystems in the river corridor."

**Response.** The river corridor zone includes the railroad/road running parallel to the river and the area between the railroad/road and the riverbank. Several forest types often characterize the zone, including riparian and upland forest habitats. This area therefore may include some "fire adaptive" species. Table 2.6 in the GMP has been clarified to reflect this via errata (see section 3.0 below) (page 2-26).

**Topic: Wildlife Habitat – Documentation of Palustrine Forested Wetlands**

**Comment.** WV DNR questioned the number of wetland areas in the park.

**Representative Quote.** GMP, page 1-29, fourth bullet (regarding wetlands). "There are more than a few; our records indicate 92 Forest Seep polygons and 28 Beaver Influenced wetland polygons."

**Response.** The GMP text has been edited via errata (see section 3.0 below) (page 1-29) to delete the quantitative reference.

**Topic: Wildlife Habitat – Aquatic Plants**

**Comment.** WV DNR questioned whether the reference to the Elodea plant (in the Aquatic Plants description) should instead reference Hydrilla.

**Representative Quote.** GMP, page 3-18, Aquatic Plants, paragraph 2, last sentence.  
“The plant referred to as Elodea may in fact be hydrilla which is very common in Bluestone Lake and was probably introduced by boaters.”

**Response.** The NPS agrees that what was called the native Elodea, is in fact, the invasive non-native Hydrilla. The GMP text has been corrected via errata (see section 3.0 below) (page 3-18).

**Topic: Water Resources – Remove Obstructions/Man-Made Debris from River**

**Comment.** WV DNR maintained that the removal of man-made obstructions, such as bridge piers, should not be allowed, and that the NPS should specify that only man-made debris, not natural debris, should be removed from the floodplain areas.

**Representative Quotes.** GMP, page 2-29, table 2.8, Parkwide Desired Condition 4, first bullet. “Removal of man-made obstructions such as the bridge piers mentioned in this statement will result in harm to the ecosystem. We are unaware of any method that allows for removal of such obstructions without likely negative impacts to the New River. As such, no in-stream work should be allowed and the obstructions should remain.”

GMP, page 4-31, Natural and Scenic Resource Management Activities, fourth bullet.  
“Only man-made debris should be removed from floodplain areas as natural debris is a natural part of the ecology of these areas.”

GMP, page 4-70, Natural and Scenic Resource Management Activities, sixth bullet. “Only man-made materials should be removed from floodplain areas. Woody debris not only decays and contributes to nutrient cycling, but provides physical cover for a wide variety of wildlife from salamanders and snakes to larger mammals like raccoons.”

GMP, page 4-81, Natural and Scenic Resource Management Activities, paragraph 1, third bullet. “Only man-made materials should be removed from floodplain areas. Woody debris not only decays and contributes to nutrient cycling, but provides physical cover for a wide variety of wildlife from salamanders and snakes to larger mammals like raccoons. This comment applies to alternatives 2 through 5.”

GMP, page 4-70, Natural and Scenic Resource Management Activities, seventh bullet “In order to remove the “old bridge piers” from the river, a WV right of entry permit would

be necessary and if a causeway was going to be constructed to access the pier(s) with heavy equipment, a 404/401 permit would be required as well. From past experience we have seen more environmental impact created from the removal of structures than the old structures were creating themselves. For this reason, due diligence must be used to separate and assess real aesthetic impact from potential environmental impact. At present, we are unaware of old bridge piers posing a danger to the environment or the public. This comment applies throughout alternatives 2 through 5."

**Response.** The NPS is aware of the potential short-term adverse impacts of removing unnecessary non-natural obstructions from streams and rivers. In making decisions on removing these obstructions we will consider the documented long-term adverse impacts of their remaining, including the build-up of sediments upstream of obstructions, channel scour around and downstream of the obstructions, their potential as a hazard to navigation, their risk of failure and consequences of that failure, and the long-term maintenance need of such obstructions.

While an interagency working agreement distinguishes between "debris", which refers to man-made material, and "drift", which refers to natural material, the GMP text has been clarified via errata (see section 3.0 below) (pages 4-23, 4-31, 4-70, 4-81, 4-133, 4-141, 4-183, 4-191, 4-236, and 4-245) by inserting "man-made" before the word debris.

#### **Topic: Wildlife – Black Bear, Fur-Bearing Mammals**

**Comment.** WV DNR questioned the accuracy of the average litter for black bears and another commenter clarified that beaver, mink, muskrat, and river otter were native and had been re-introduced.

**Representative Quote.** GMP, page 3-27, Black Bear. "Based on winter den surveys, average litter size for bears in southern WV is 2.85, not 3.

GMP, page 3-28, Fur-bearing and Other Mammals. "Beaver, mink, muskrat and river otter are all native to the New River. Beavers were reintroduced by the WV DNR."

**Response.** The average litter size of bears will be changed to "2.85". The GMP text has been changed via errata (see section 3.0 below) (pages 3-27 and 3-28) to reflect that the species "are native and were re-introduced."

#### **Topic: Wildlife – Wild Turkey**

**Comment.** WV DNR asked for updated harvest data and voiced the concern that poorly marked boundaries contributed to the low game check numbers in the park.

**Representative Quote.** GMP, page 3-30, Wild Turkey. "The harvest numbers presented are eight years old and should be updated to reflect more timely data. We continue to contend that the poorly delineated boundary lines will significantly contribute to the low number of game animals checked in from the park. Many hunters do not know they are hunting on NPS property and a hunter survey will do nothing to solve this problem."

**Response.** The GMP text has been updated via errata (see section 3.0 below) (page 3-30) to include 2009 game harvest data.

The park continues to survey and clearly mark the park boundary and wishes to work closely with the WV DNR to conduct surveys and publish better information and maps to improve the harvest data reported in the park.

## 2.4 Suggestions for Implementation

The park superintendent received one suggestion from an individual regarding implementation of resource management, administrative, maintenance, and interpretive operations. This stated that NERI should include "Bridge Day BASE Jumping" as part of any NPS stories that are told to park visitors.

Detailed suggestions for implementation of this type are not considered to be substantive under the definition provided by NPS Director's Order 12 Handbook, section 4.6 (A). Detailed operational suggestions for implementation are more appropriately addressed on a day-to-day basis or in implementation plans rather than in a GMP. Therefore, individual responses to such suggestions are not provided. However, the suggestion offered by the commenter is valuable and will be considered by park staff and partners as the GMP is implemented.

## 3.0 Errata

This section contains revisions and corrections to the *Draft GMP/EIS*. Some of these changes provide further clarification as a result of public comment. Others correct errors discovered after publication of the draft. The combination of the *Draft GMP/EIS* and the *Abbreviated Final GMP/EIS*, including these errata, constitutes the complete and final record on which the record of decision will be based.

The revisions and corrections are listed below. Corrections to the text are presented first, followed by additions to the appendices. The corrections are noted by page, paragraph, and sentence or bullet number. Changes are indicated by presenting the revised sentence with deleted text shown in ~~strikeout~~ and added text shown in underline.

### 3.1 General Management Plan (GMP) Text Corrections

- **GMP, page 1-6, last paragraph, first sentence:**

The expanse of mixed mesophytic forest that covers most of the park is part of the largest remaining area of ~~midatlantic~~ midlatitude forest in the ~~world~~ nation.

- **GMP, page 1-6, last paragraph, third sentence:**

These large blocks of unfragmented forest are largely intact natural landscapes and are ~~globally~~ nationally significant because of their combined expanse and because they provide significant critical habitat for neotropical migratory birds, especially for wood warblers.

- **GMP, page 1-29, paragraph 1, bullet 4:**

- ~~a few scattered~~ palustrine forested wetlands, palustrine scrub-shrub deciduous wetlands, and palustrine emergent wetlands in upland areas

- **GMP, pages 1-37 and 1-38, bullet 3, Wild and Scenic River Resources:**

~~The Wild and Scenic Rivers Act establishes a system of rivers that possess outstanding scenic, recreational, geological, cultural, or historic values, and maintains their free-flowing conditions for future generations. The New River was found to possess several characteristics making it eligible for inclusion in the National Wild and Scenic Rivers System, including wildlife, cultural, recreational, and geologically outstandingly remarkable values. The New River, however, has not been recommended as suitable for inclusion in the National Wild and Scenic Rivers System nor designated a Wild and Scenic River. Management actions included in the GMP alternatives would not adversely impact the values that potentially qualify the New River for inclusion in the National Wild and Scenic Rivers System. Congress has previously examined on several occasions the potential for wild and scenic river (WSR) designation for the New River and its tributaries. In 1976 the Bureau of Outdoor Recreation, in response to a Congressional request, recommended that the New River Gorge be designated a component of the National Wild and Scenic River System under overall management of the NPS. In the mid-70s one conservation group supported designation of the New River as a WSR, while another local group supported its designation as a national park. In 1978, Congress considered both designations and instead chose, through Public Law 95-625, to establish the New River Gorge National River. This legislation amended the National Wild and Scenic Rivers Act, adding various river segments to the system and designating rivers for study. It also established, in Title XI section 1101, the New River Gorge National River as a unit of the national park system "for the purpose of conserving and interpreting outstanding natural, scenic, and historic values and objects in and around the New River Gorge and preserving~~

as a free-flowing stream an important segment of the New River...for the benefit and enjoyment of present and future generations...". Furthermore, section 1108 amended section 5(a) of the Act of October 2, 1968 (82 Stat. 910) to provide for study of three principal tributaries of the New River in West Virginia... including the Bluestone, Gauley (including the tributaries of the Meadow and Cranberry), and the Greenbrier." The national river protections extended beyond the New River itself to include an area much larger than the average width of a WSR corridor, with several tributaries extending over five miles. The New River was added to the National River Inventory in 1982, identifying four outstandingly remarkable values – wildlife, recreation, cultural, and geologic.

Congress reexamined potential WSR designations for the New River and its tributaries through Public Law 100-534 known as the "West Virginia National Interest River Conservation Act of 1987." Section 2 Findings and Purpose (a) of the Act states, "The Congress finds that, (1) the outstanding natural, scenic, cultural and recreational values of the segment of the New River...within the boundaries of the New River Gorge National River have been preserved and enhanced by its inclusion in the national park system; (4) several tributaries of the New River in West Virginia also possess remarkable and outstanding features of national significance; (5) portions of several of the New River tributaries, including segments of the Gauley River, the Meadow River, and the Bluestone River are suitable for inclusion in the National Park System or the National Wild and Scenic Rivers System; and (6) it is in the national interest to preserve the natural conditions of certain segments of the New, Gauley, Meadow, and Bluestone Rivers in West Virginia to enhance recreational opportunities available on the free-flowing segments." Further, Congress in Title I of the West Virginia National Interest Conservation Act of 1987 addressed issues at the New River Gorge National River, in Title II established the Gauley River National Recreation Area, and in Title III designated the Bluestone National Scenic River.

Based on this extensive legislative history, the NPS has concluded that the eligibility and suitability assessments required pursuant to NPS policy have been met and that Congress has acted on the agency's proposal. Further eligibility recommendations for additional tributaries within the authorized boundary of New River Gorge National River are unnecessary due to the much greater protections afforded by the national river designation. Since the NPS does not believe that the management actions included in the GMP alternatives would adversely impact the values that potentially qualify the New River for inclusion in the National Wild and Scenic Rivers System, this topic was dismissed from further analysis.

Therefore the wild and scenic river resources impact topic was dismissed from further analysis in this GMP/EIS.

- **GMP, page 1-49, paragraph 2, first sentence:**  
 Currently both the trailheads and parking have been developed on the Glade Creek access road, although neither has a vault toilet; the footbridge has been constructed across Glade Creek; and the lower half of the I-64 bridge service road is closed to motor vehicles (however, the upper half is managed as an administrative road to permit occasional use by NPS-approved fish stocking vehicles).
  
- **GMP, page 2-21, table 2.5, Development Areas, Existing Conditions and Facilities (column 2) and Examples of Changes Needed to Achieve Desired Conditions:**

**Table 2.5 Alternative 1 (Continuation of Current Management) – Area-Specific Desired Conditions and Needed Changes**

Site-Specific Area (upstream to downstream)	Existing Conditions and Facilities	Desired Conditions	Examples of Changes Needed to Achieve Desired Conditions
<b>Development Areas</b>			
<b>Fayette Station</b>	<ul style="list-style-type: none"> <li>▪ Fayette Station Road (high use) (traffic volumes and types of vehicles generally exceed the roadway’s design capacity)</li> <li>▪ river access (high use)</li> <li>▪ day use facilities (parking, picnicking, public restrooms)</li> <li>▪ CSX Main Line (active)</li> <li>▪ visitors (primarily private paddlers) frequently illegally cross the CSX Main Line to reach the river access</li> <li>▪ <u>Bridge Day landing area</u></li> </ul>	<ul style="list-style-type: none"> <li>▪ visitors enjoy a safe and secure experience at the park</li> <li>▪ traffic circulation and parking is managed to reduce impacts on park resources and provide for safe visitor use while mitigating intrusion of auto traffic on the visitor experience</li> </ul>	<ul style="list-style-type: none"> <li>▪ work cooperatively with the CSX Corporation to secure safe pedestrian access to existing visitor parking</li> <li>▪ work cooperatively with WV DOH to facilitate improvements to WV SR 82 (widening and addition of pull-outs – actions to allow two-way traffic)</li> <li>▪ <u>continue to work cooperatively with partners to provide safe opportunities for Bridge Day visitor activities</u></li> </ul>

- **GMP, page 2-26, table 2.6, Backcountry Zone (row 1), Forest (column 2), last bullet:**
  - prescribed fire occurs in fire adaptive dependent ecosystems
  
- **GMP, page 2-26, table 2.6, Frontcountry Zone (row 2), Forest (column 2), last bullet:**
  - prescribed fire occurs in fire adaptive dependent ecosystems
  
- **GMP, page 2-26, table 2.6, River Corridor Zone (row 3), Forest (column 2), last bullet:**
  - prescribed fire occurs in fire adaptive dependent ecosystems
  
- **GMP, page 2-27, table 2.6, Park Development Zone (row 5), Activities (column 2), last bullet:**
  - BASE jumping

■ **GMP, page 2-32, table 2.8, Desired Condition 10, last bullet:**

- ~~Complete a development management plan for the management of early successional habitats on the Hilton Strip and in other large blocks of early successional habitats~~

■ **GMP, page 2-35, table 2.8, Desired Condition 19:**

The park's museum collections appropriately represents ~~the appropriate breadth of collections that represent all interests of the park~~ the significance of New River Gorge National River.

■ **GMP, page 2-35, table 2.8, Desired Condition 19, new bullets:**

- Complete and regularly update the Scope of Collections Statement
- Review the existing collections and ensure they are appropriate to the park
- Collect only items necessary to understand and interpret the park's significance

■ **GMP, page 2-39, table 2.8, Desired Condition 33, new bullets:**

- Consider activities that might be appropriate concessions and develop a commercial services plan
- Using NPS procedures, advertise for and establish appropriate concessions

■ **GMP, page 2-68, add a paragraph at the end of the page:**

Boy Scouts of America. During the development of this GMP, the Boy Scouts of America (BSA) have emerged as a significant partner at the park. The BSA has announced plans to bring the national jamboree to a site adjacent to the park starting in 2013. In addition, the BSA will develop its fourth high adventure camp at the same location, providing boys and girls with the opportunity to experience rafting, climbing, hiking, and biking within the park. As this partnership develops, the NPS would collaborate to provide experiences for these youth.

■ **GMP, pages 2-70 and 2-71, table 2.12, Area-Specific Desired Conditions and Needed Changes, Forest Areas, lines 1 through 6:**

Table 2.12 Alternatives 2 to 5 – Area-Specific Desired Conditions and Needed Changes

Management Zone/ Site-Specific Area (upstream to downstream)	Existing Conditions and Facilities	Desired Conditions	Examples of Changes Needed to Achieve Desired Conditions
<b>Brooklyn to Hawks Nest</b>	<ul style="list-style-type: none"> <li>Brooklyn                             <ul style="list-style-type: none"> <li>undesignated camping (moderate use)</li> <li>river fishing (no day use facilities) (moderate use)</li> </ul> </li> <li>Teays Landing river access (private)</li> <li>CSX Main Line on river right upstream of Cunard and on river right and river left downstream of Cunard (active)</li> <li>visitors frequently illegally cross over CSX Main Line                             <ul style="list-style-type: none"> <li>to reach the lower railroad area (for fishing and boating)</li> <li>to reach Short Creek (for camping and fishing)</li> <li>to reach Kaymoor via the tunnel under the tracks (for hiking)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>visitor services and facilities are appropriately scaled and located, and they facilitate enjoyable and educational visits to the park</li> <li>visitors enjoy a safe and secure experience at the park</li> </ul>	<ul style="list-style-type: none"> <li>acquire Teays Landing river access from willing sellers</li> <li>work cooperatively with the CSX Corporation to secure safe legal public access to the river across the CSX right-of-way in the lower railroad area, at Short Creek, and at Kaymoor</li> <li>work cooperatively with the WV DOT to provide tours of the New River Bridge using the bridge's maintenance catwalk</li> </ul>
<b>Forest Areas</b>			
<b>Rush Run</b>	<ul style="list-style-type: none"> <li>Brooklyn Mine Trail (high use)</li> <li>Southside Trail (high use)</li> <li>Cunard Access Road</li> <li>Cunard Trailhead parking area</li> <li>provides critical habitat for rare mammals</li> </ul>	<ul style="list-style-type: none"> <li>rare animals are protected</li> </ul>	<ul style="list-style-type: none"> <li>limit visitor use to day use only</li> </ul>
<b>Sewell</b>	<ul style="list-style-type: none"> <li>hunting area (plateau above Fire Creek, Ephraim Creek, Mann Creek, and Keeney Creek)</li> <li>no NPS facilities</li> <li>partially included within Babcock State Park (facilities include trails)</li> <li>fish stocking in Glade Creek and Mann Creek by WV DNR (moderate use)</li> <li>provides critical habitat for rare mammals</li> <li>rare pine communities occur on cliffs</li> </ul>	<ul style="list-style-type: none"> <li>rare animals are protected</li> </ul>	<ul style="list-style-type: none"> <li>limit visitor use to day use only</li> </ul>
<b>Beauty Mountain</b>	<ul style="list-style-type: none"> <li>Beauty Mountain climbing area</li> <li>Beauty Mountain overlook (no designated trail)</li> <li>provides critical habitat for rare mammals</li> <li>rare rimrock pine communities occur in cliff areas</li> </ul>	<ul style="list-style-type: none"> <li>rare animals are protected</li> </ul>	<ul style="list-style-type: none"> <li>limit visitor use to day use only</li> </ul>
<b>Endless Wall</b>	<ul style="list-style-type: none"> <li>Fayette Station Road (high use) (traffic volumes and types of vehicles generally exceed the roadway's design capacity)</li> <li>Ambassador Buttress climbing area (low use)</li> <li>Diamond Foot/Cirque climbing area (moderate use)</li> <li>Endless Wall climbing area (high use)</li> <li>Endless Wall Trail and Nuttall Trailhead (high use)</li> <li>Fern Creek Trail and Trailhead (high use)</li> <li>proliferation of undesignated trails accessing Ambassador Buttress and at the base of the Endless Wall</li> <li>provides critical habitat for rare mammals</li> <li>rare pine communities occur on cliffs</li> </ul>	<ul style="list-style-type: none"> <li>rare animals are protected</li> <li>cliff communities are maintained and sustain populations of rare and significant species</li> <li>rimrock pine communities are maintained</li> <li>a variety of trails enable visitors with different physical capabilities to explore the park</li> <li>visitor services and facilities are appropriately scaled and located, and they facilitate enjoyable and educational visits to the park</li> </ul>	<ul style="list-style-type: none"> <li>limit visitor use to day use only</li> <li>prohibit bike use</li> <li>designate a trail at the base of Endless Wall</li> <li>provide a trail to Ambassador Buttress (with trailhead facilities)</li> </ul>
<b>Sunshine Buttress</b>	<ul style="list-style-type: none"> <li>Fayette Station Road (high use) (traffic volumes and types of vehicles generally exceed the roadway's design capacity)</li> <li>New River Bridge Trail (low use)</li> <li>Sunshine Buttress climbing area (low use)</li> <li>no designated trails to climbing routes</li> </ul>	<ul style="list-style-type: none"> <li>rare animals are protected</li> <li>cliff communities are maintained and sustain populations of rare and significant species</li> <li>rimrock pine communities are maintained</li> <li>a variety of trails enable visitors with</li> </ul>	<ul style="list-style-type: none"> <li>limit visitor use to day use only</li> <li>designate a trail at the base of Sunshine Buttress</li> <li>provide a trail to Sunshine Buttress (with trailhead facilities)</li> </ul>

Table 2.12 Alternatives 2 to 5 – Area-Specific Desired Conditions and Needed Changes

Management Zone/ Site-Specific Area (upstream to downstream)	Existing Conditions and Facilities	Desired Conditions	Examples of Changes Needed to Achieve Desired Conditions
	<ul style="list-style-type: none"> <li>at the top or base of Sunshine Buttriss</li> <li>▪ provides critical habitat for rare mammals</li> <li>▪ rare rimrock pine communities occur in cliff areas</li> </ul>	<ul style="list-style-type: none"> <li>different physical capabilities to explore the park</li> <li>▪ visitor services and facilities are appropriately scaled and located, and they facilitate enjoyable and educational visits to the park</li> </ul>	
<b>Ames</b>	<ul style="list-style-type: none"> <li>▪ Fayette Station Road (high use) (traffic volumes and types of vehicles generally exceed the roadway's design capacity)</li> <li>▪ Bridge Buttriss climbing area (high use)</li> <li>▪ Bridge Buttriss parking area</li> <li>▪ Bubba City climbing area (mod use)</li> <li>▪ Junkyard climbing area (moderate use)</li> <li>▪ no designated trails to climbing routes at Bubba City or Junkyard</li> <li>▪ provides critical habitat for rare mammals</li> <li>▪ rare rimrock pine communities occur in cliff areas</li> </ul>	<ul style="list-style-type: none"> <li>▪ <del>rare animals are protected</del></li> <li>▪ cliff communities are maintained and sustain populations of rare and significant species</li> <li>▪ rimrock pine communities are maintained</li> <li>▪ a variety of trails enable visitors with different physical capabilities to explore the park</li> <li>▪ visitor services and facilities are appropriately scaled and located, and they facilitate enjoyable and educational visits to the park</li> </ul>	<ul style="list-style-type: none"> <li>▪ <del>limit visitor use to day use only</del></li> <li>▪ provide a trail to the Junkyard climbing area (with trailhead facilities)</li> <li>▪ designate a trail at the base of the Bubba City climbing area</li> </ul>

- **GMP, page 2-144, paragraph 2, second sentence:**

All new trails would generally use existing unmaintained trails, where possible, or the most sustainable alternative considering terrain and park resources.

- **GMP, page 2-145, paragraph 1, first sentence:**

Possible new trails offering visitors experiences in and around river gateways would include:

- a trail to Fayette Mine
- a trail from Thurmond to Sewell
- a trail along Davis Branch (in the Meadow Creek North area) (with trailhead facilities)
- a trail from Dowdy Creek to Highland Mountain
- a trail from the Stone Cliff coke ovens to Stone Cliff Mine
- a trail to the Beauty Mountain Overlook
- trails to scenic waterfalls, overlooks, and other natural places of interest

- **GMP, page 2-147, Access and Parking (alternative 5 – preferred alternative), add a new paragraph following the fourth paragraph:**

In the future the NPS would complete an alternative transportation study to consider alternative transportation system options in the park. This would include study of a

variety of travel modes, such as enhanced trail and bicycle access, use of visitor shuttles, and use of existing rail lines for visitor excursion trains. Existing rail lines that could be evaluated for reuse by excursion trains as a means of enhancing visitor access to the park possibly include, but are not limited to, the following:

- Mt. Hope to Southside Junction (if and when the CSX Corman line right-of-way is abandoned and acquired by the NPS)
- Meadow Bridge to Meadow Creek (if and when the CSX Meadow Cree spur line is abandoned and acquired by the NPS)
- Stanaford to Prince/Quinnimont (if and when the CSX Piney Creek spur line right-of-way is abandoned and acquired by the NPS)

■ **GMP, page 2-150, paragraph 3, first sentence:**

In the future the NPS land protection program would focus efforts on the highest priority properties still to be protected in the park (see section 2.4.7 2-4-8 above).

■ **GMP, page 2-150, paragraph 4, first and second sentences:**

In the future the NPS would work cooperatively with the owners of private lands remaining within the park boundary to promote sensitive stewardship of privately-owned resources and values that are fundamental to the park (see section 2.4.7 2-4-8 above). In alternative 5 NPS would further focus the stewardship program on the private lands that are of high priority for protection as noted in section 2.4.7 2-4-8 above and in the preceding section (Land Protection Priorities).

■ **GMP, page 2-152, Other Partnerships (Alternative 5 – Preferred Alternative), paragraph 1, second sentence:**

In alternative 5 the NPS would further increase collaborative efforts with the state parks (for trail development), with biking stakeholder groups (for development of stacked loop trails), ~~and~~ with the WV DNR (for development of a cooperative game management plan and harvest monitoring, and with the U.S. Army Corps of Engineers and with the WV DNR (for cooperation concerning the water requirements of the national river).

■ **GMP, page 2-194, table 2.37, Comparison of Impacts of the Alternatives, Floodplains, Alternative 5:**

~~Without a new river access at Surprise:~~

- local long-term minor to major beneficial impacts
- local long-term minor adverse impacts

~~With a new river access at Surprise:~~

- ~~- local long-term minor to major beneficial impacts~~
- ~~- local long-term minor to moderate adverse impacts~~

■ **GMP, page 3-15, paragraph 2, first sentence**

~~New River Gorge National River is located within an~~ The expanse of mixed-mesophytic forest in which New River Gorge is located ~~that~~ is the largest remaining area of ~~midatlantic~~ midlatitude forest in the world, making it a nationally significant resource (Ritters et al. 2000).

■ **GMP, page 3-16, paragraph 2, second sentence:**

Three upland deciduous forest associations dominate, intergrading with one another and generally correlating with soil moisture and fertility gradients affected by topographic position, aspect, and geology (Vanderhorst ~~Vanderhorst~~ 2007).

■ **GMP, page 3-16, paragraph 3, first sentence:**

Three additional deciduous forest associations occur less extensively in the park (Vanderhorst ~~Vanderhorst~~ 2007):

■ **GMP, page 3-16, paragraph 4, first sentence:**

Less abundant than deciduous forests are natural upland forests with a significant conifer component that occur in more specialized habitats (Vanderhorst ~~Vanderhorst~~ 2007):

■ **GMP, page 3-16 (to page 3-17), fifth paragraph, last sentence:**

Probable reasons for high diversity of species and communities in riparian zones include abundant seed sources, abundant moisture and nutrients, and strong environmental gradients created by variation in flooding intensity and periodicity as affected by elevations (Vanderhorst ~~Vanderhorst~~ 2007).

■ **GMP, page 3-17, second paragraph, second sentence:**

Four successional forest types and additional patches of early successional Old Field occur within these areas (Vanderhorst ~~Vanderhorst~~ 2007).

- **GMP, page 3-17, fourth paragraph, first sentence:**

In the absence of fire or other human-caused canopy and ground disturbance the aerial cover of the park's upland forest and woodland associations are likely to change in generally predictable ways (Vanderhorst ~~Vanderhoerst~~ 2007).

- **GMP, page 3-17, fifth paragraph, first sentence:**

Successional dynamics of riparian and headwater wetland communities in the park are quite different from those of upland communities (Vanderhorst ~~Vanderhoerst~~ 2007).

- **GMP, page 3-18, replace paragraph 2 as follows:**

The dominant macrophyte in the park is water star grass (*Heteranthera dubia*), an aquatic grass often associated with mussel beds in the New River (Buhlmann et al. 1987; Jirka et al. 1987; Buhlmann 1990). Aside from its association with mussel beds, water star grass provides habitat for macroinvertebrates and fish in the New River. Pondweed (*Potamogeton* spp.) and Nuttall waterweed (*Elodea* spp.) are also common in the New River and are often present in mussel beds (Buhlmann et al. 1987; Jirka et al. 1987; Buhlmann 1990). The size of *Elodea* beds within the park has increased in recent years, perhaps due to increased eutrophication of the New River (Buhlmann 1990).

The park is host to a number of aquatic plants (Buhlmann et al. 1987; Jirka et al. 1987; Buhlmann 1990) that add another dimension of diversity and complexity to the New River and its tributaries. Important plants include pondweeds (*Potamogeton* spp.), rushes (*Scirpus* spp.), water willow (*Justicia americana*), water star-grass (*Heteranthera dubia*), and riverweed (*Podostemum* sp.). Over the past ten or more years, beds of the invasive non-native *Hydrilla* have greatly expanded in the New River. In many areas *Hydrilla* is now the dominant aquatic plant.

- **GMP, page 3-18, fourth paragraph, first sentence:**

Several vegetation associations in the park are likely to be globally and/or state rare (Vanderhorst ~~Vanderhoerst~~ 2007).

- **GMP, page 3-18, last paragraph, second sentence:**

It is a globally rare ecological community that is composed of ~~locally rare sedges~~, cedars, pines, locally rare sedges, and other rare plants.

- **GMP, page 3-19, table 3.3, last line:**

Source: Vanderhorst ~~Vanderhoerst~~ 2007

- **GMP, page 3-20, paragraph 3, add a sentence at the end:**

Ongoing vegetation monitoring in the park (Perles et al. 2010) indicates that 10 percent of monitored vegetation plots have high deer browse impact on preferred browse species and 54 percent of the plots have moderate deer browse impacts (unpublished, Perles).

- **GMP, page 3-20, paragraph 4:**

**Exotic Insects and/or Diseases.** Several exotic insects have impacted the park's vegetation. Oak mortality by gypsy moths (*Lymantria dispar*) may be partially responsible for decline in oak in the park (Mahan 2004). The forest defoliator, gypsy moth (*Lymantria dispar*), has been known to occur in low numbers within the park for several years, but their populations are expected to increase in the near future. There is potential for the gypsy moth to significantly impact the native oak forests, especially on dry, west-facing slopes. However, defoliation attributed to gypsy moth has declined dramatically in the mid-Atlantic region over the last decade due in part to the spread to the introduction of a fungus that is fatal to the pest and due to the application of a lethal bacteria suppression efforts by state and federal agencies. Occasional outbreaks of gypsy moth populations are still possible. The ridges, south-facing aspects, and dry plateau areas with significant oak component have the potential for being most affected (Mahan 2004).

Emerald ash borer (EAB) is a non-native forest pest threatening all species of ash at New River Gorge National River (NERI). In 2009, the Animal Plant Health Inspection Service (APHIS) documented the occurrence of EAB at NERI. Based on these recent finds, it is likely that ash mortality is already occurring in the park and that EAB populations will be expanding rapidly throughout the park. NERI has an abundant ash resource with 34,400 acres (or 45 percent of the park total acreage) having an ash composition of 10 to 20 percent. This is an extremely high percentage of ash compared to the 4 percent coverage statewide. Ash is a dominant canopy tree in the riparian zone of NERI, where it attains heights of greater than 100 feet and up to 200 years old. The spread of this forest pest has the potential to have widespread impacts on the ash component of NERI forestlands.

- **GMP, page 3-20, paragraph 5, third and fourth sentences:**

Many stands of hemlock are likely to die and survival of individual trees or small stands may depend on human intervention (Vanderhorst Vanderhoorst 2007). Decline of hemlock may represent the single greatest change to vegetation in the park in the near future (Vanderhorst Vanderhoorst 2007).

- **GMP, page 3-21, second paragraph, second sentence:**

These are areas of the park where recreation activities (boating, fishing, rock climbing, and sightseeing) are concentrated and threaten occurrences of potentially rare vegetation communities and their component plant and animal species (Vanderhorst Vanderhoorst 2007).

- **GMP, page 3-21, fourth paragraph, first sentence:**

The spread of exotic plant species poses the greatest threat to the park's native vegetation because of their ability to often outcompete native species (Vanderhorst Vanderhoorst 2007).

- **GMP, page 3-21, fourth paragraph, fourth sentence:**

Weedy exotics have also become established in natural vegetation types, especially in rich forests and riparian communities (Vanderhorst Vanderhoorst 2007).

- **GMP, page 3-21, paragraph 4, fifth sentence:**

Kudzu is a very ~~pervasive~~ persistent nonnative plant in the park that threatens natural communities as well as cultural resources. Several species of nonnative honeysuckle, autumn olive, and multi flora rose are displacing native species and altering the vegetative structure of many riparian plant communities.

- **GMP, page 3-22, paragraph 3, last sentence:**

The most common species within the New River are bigmouth chub (*Nocomis platyrhynchus*), spotfin shiner (*Cyprinella spiloptera*), silver shiner (*Notropis photogenis*), mimic shiner (*Notropis volucellus*), bluntnose minnow (*Pimephales notatus*), channel catfish (*Ictalurus punctatus*), flathead catfish (*Pylodictis olivaris*), ~~and~~ smallmouth bass (*Micropterus dolomieu*), and rock bass (*Ambloplites rupestris*) (Lobb et al. 1987, Purvis et al. 2002).

- **GMP, page 3-23, paragraph 1:**

Delete last sentence: ~~The most recent addition to the New River fauna is the rudd (*Scardinius erythrophthalmus*), a minnow native to Europe (Easton et al. 1991).~~

- **GMP, page 3-23, paragraph 3, line 8:**

Most game fish presently found in the New River were deliberately introduced, and only four game fish, American eel (*Anguilla rostrata*), channel and flathead catfish, and green

sunfish (*Lepomis cyanellus*), are known to be native (Jenkins et al. 1994). Recent evidence suggests that a unique population of walleye in the upper New River in Virginia may be native (Palmer 1999; Palmer et al. 2007).

■ **GMP, page 3-23, paragraph 4, line 7:**

Catch-and-release regulations are in effect for spotted, smallmouth and largemouth bass in the park between I-64 and the takeout at Grandview Sandbar).

■ **GMP, page 3-24, paragraph 1, line 6:**

~~An apparently~~ A self-maintaining population of brook trout has become established in Buffalo Creek, which is designated “fly-fishing only” by the state.

■ **GMP, page 3-24, paragraph 1, line 8:**

Delete last sentence: ~~An apparently self-maintaining population of brown trout has become established in lower Glade Creek, which is designated “catch and release” by the state.~~

■ **GMP, page 3-25, paragraph 4, line 3:**

Black flies are an important food source for a multitude of aquatic predators, including young and adult foraging fish, ~~including smallmouth bass.~~

■ **GMP, page 3-26, paragraph 2, last sentence:**

Replace last sentence: ~~Whether introduced crayfish have continued to expand their dominance in the community is a threat to the food supply for smallmouth bass and a threat to the commercial bait fishery in the area between Bluestone Dam and Sandstone Falls.~~ At this time it is not known what influence the expanded dominance of introduced crayfish is having on fish (including smallmouth bass) diets and other components of the New River ecosystem.

■ **GMP, page 3-27, paragraph 5, third sentence:**

Recent studies in these counties indicate a very healthy bear population with an average litter size of ~~three~~ 2.85 cubs.

- **GMP, page 3-28, paragraph 5, second sentence:**

Beaver (*Castor Canadensis*), mink (*Mustela vison*), muskrat (*Ondatra zebithicus*), and river otter (*Lutra Canadensis*) ~~have been introduced~~ are native and were re-introduced into the New River system (Purvis et al. 2002).

- **GMP, page 3-30, paragraph 2, fourth sentence:**

In ~~2002~~ 2009 there were ~~49~~ 21 turkeys harvested in the spring from the park (WV DNR ~~2003~~ 2009).

- **GMP, page 3-33, paragraph 2, second sentence:**

Species designated extremely rare and critically imperiled in the state of West Virginia include ~~49~~ 28 plant species, 2 mammal species (small-footed myotis and Rafinesque's big-eared bat), and 2 mussel species (purple wartyback and pocketbook mussel).

- **GMP, page 3-33, paragraph 3:**

No federally-designated plant species are known to occur within the park. However ~~two~~ federally-designated plant species (not listed in Appendix F, Table F.3) are suspected although their presence has not yet been confirmed by resource managers. there is a record for one federally-designated plant species. Virginia spirea (*Spiraea virginiana*) is a federally threatened, disturbance-adapted shrub of the riparian zone occurring on steeply slope riparian sites that was found historically along the New River below near Hawks Nest Dam in the 1960s (Mahan 2004). Running buffalo clover (*Trifolium stoloniferum*) is a federally endangered species plant that occurs within New River Gorge at has reportedly been found on the Cotton Hill floodplain in located just outside the park boundary (Mahan 2004). Habitat for both rare plants exists in the park, but repeated attempts to locate populations of the species inside the park have proved negative.

- **GMP, page 3-33, replace paragraphs 4 and 5 with:**

The New River Gorge has served as a migration corridor for plants through the Appalachian Mountains for millennia. Retreat of the northern ice sheets and the consequent amelioration of the climate has resulted in the elimination of many of the northern species from New River Gorge and permitted the southern species to advance, both latitudinally to the north and altitudinally to higher elevations in the mountains. However, micro-habitats exist in a few high elevation wetlands and steep, cool, cove forests that provide refuge for northern plants uncommon in southern West Virginia. For these reasons, several plants are found in the park at the northern or southern extent of their range, resulting in a large number of rare plants, some of which are endemic to the

park. The park is host to sixty-three rare plants that are tracked by the West Virginia Natural Heritage Program. Of these sixty-three rare plants: twenty-eight plants are listed as, S1-extremely rare and critically imperiled, with five or fewer occurrences statewide; while another thirty-five plants are listed as, S2-very rare and imperiled, with six to twenty occurrences statewide.

- **GMP, page 3-33, paragraph 6, third sentence:**

The park contains ~~stable, healthy, globally significant populations of Allegheny woodrats (*Neotoma magister*), a federally designated species of special concern that is in decline throughout the rest of its range in the eastern United States (Balcom et al. 1996)~~ globally significant populations of Allegheny woodrats (*Neotoma magister*), a species that is under review for listing by the US FWS. Though the population is thought to be stable in West Virginia, it is in decline throughout much of its range in the eastern United States (Balcom et al. 1996).

- **GMP, page 3-34, first paragraph:**

The ~~federally endangered~~ northern flying squirrel (*Glaucomy volans fuscus*), is predicted to occur in the park but never documented (~~WV Gap Analysis Program 2003~~).

- **GMP, pages 3-34 and 3-35, section 3.3.1 Prehistoric Archeological Resources:**

Revise text under Prehistoric Archeological Resources bullet:

**3.3.1 Pre-Historic Native American Cultural Resources/Contexts** ~~Prehistoric Archeological Resources~~

Four historic contexts provide a framework for describing and understanding the pre-historic Native American cultural resources within the boundaries of the New River Gorge National River: 1) Paleoindian, 2) Archaic, 3) Woodland, and 4) Late Prehistoric/Protohistoric. Additional information on these contexts can be found the archeological overview assessment done by Pollack and Crothers (2005) and Fuerst (1981).

- **Paleoindian Historic Context** ~~Prehistoric Archeological Resources~~

The first human occupants in the New River Gorge area were Paleo-Indian hunters who arrived about 13,000 years ago. Two features of the gorge area significantly influenced prehistoric use of the region, making it an extremely interesting location archeologically (Pollack and Crothers 2005). Native Americans who inhabited the area in prehistoric times dating back over 13,000 years ago were primarily attracted by the abundance of natural resources in its uplands and riparian areas. Level ground in the uplands on either

side of the New River also provided natural north-south travel corridors connecting prehistoric cultures in the Southeast and Ohio River Valley. Clovis projectile points, which are representative of the early Paleoindian period, have been recovered at the 46SU104 and 46SU107 sites. Late Paleoindian Plano, Hardaway and Hardaway-Dalton spearpoints have also been found at the 46SU113, 46RG70 and other sites in the park.

■ **Archaic Historic Context**

Environmental changes at the end of the glacial era 10,000 years ago led the Native Americans of the New River Gorge area and the rest of eastern North America to adopt a more localized pattern focused on the hunting of deer, turkey, shellfish, and other animals and the gathering of nuts and other wild plant foods. Between 8,000 and 3,000 years ago people began domesticating native plants such as squash, gourd, sunflower, sumpweed, goosefoot, and maygrass. Hunter-gatherer populations also increased in size and became more settled into river drainages. The chronology of the Archaic period is marked by the appearance of a wide variety of notched, bifurcated, broadspear and stemmed spear point types. The 46FA50, 46FA102, 46FA129, 46FA140, 46FA152, 46FA159, 46RG64, and 46SU113 sites are among the many significant Archaic sites in the park.

■ **Woodland Historic Context**

At the start of the Woodland period a 3,000 years ago the Native American people of eastern North America began making pottery and burying their dead in mounds. Adena and Hopewell moundbuilders in the Kanawha and upper Ohio valleys of West Virginia constructed elaborate burial mounds and earthworks. Evidence of their Early to Middle Woodland moundbuilding in the New River Gorge area is limited to the 46FA148, 46SU25, and a few other sites. Early to Middle Woodland sites, however, are fairly common in the park. The subsistence economy of the Adena, Hopewell, and the Late Woodland Buck Garden and Radford peoples, who lived in and around the gorge involved hunting, nut gathering, and the cultivation of domesticated native crops and possibly corn. In addition to their distinctive pottery types and mortuary rituals, Native American Woodland peoples in the area made many different types of stemmed and notched spear points. Late in the period, the bow and arrow replaced the spear. Significant Woodland resources in the park include the 46FA71, 46FA72, 46FA128, 46FA129, 46FA148, 46FA176, 46FA186, 46RG76, and 46SU107 sites.

■ **Late Prehistoric/Protohistoric Historic Context**

Around AD 900 to 1000 Native American peoples in the New River Gorge area became village farmers focused on growing corn in fields on fertile soils along the New River. Intermontane and Dan River Cultures upstream of the gorge included prehistoric cultures of the valley and ridge province of the upper Tennessee River system and the upper reaches of the Roanoke River Valley. A significant Fort Ancient Bluestone phase farming

community was present in the Bluestone Lake area immediately upstream from the gorge. Downstream of the gorge prehistoric groups had more affinities with the Fort Ancient Culture of the Kanawha and Ohio River Valleys. While the cultures represented tribal societies of similar sociopolitical complexity, they were distinguished from one other by differences in material culture, subsistence patterns, and village organization (Pollack and Crothers 2005). Non-local goods found at sites upstream and downstream of the gorge – in the form of marine shell and copper artifacts – suggest that these groups participated in long distance exchange networks, especially after A.D. 1400 (Pollack and Crothers 2005).

In the lower New River region the protohistoric period dates from the late 16<sup>th</sup> to early 17<sup>th</sup> centuries, and marks the undocumented contact between Euro-Americans and the area's indigenous Native American peoples. The glass beads, copper and brass items found at archeological sites in the region are indicators of the proto-historic trade and exchange between Native American and Euro-Americans. During the protohistoric and contact periods Native American societies were profoundly affected by influenza and other diseases that Europeans brought from the Old World. Evidence of the settlements of historical tribes in the region, however, is sparse, and does not warrant the formation of an historic context for the contact period. The most significant Late Prehistoric/Protohistoric resources in and around the park include the 46FA129, 46FA179, 46RG7, 46RG10, 46RG69, 46SU17, 46SU86, and 46MC1 sites.

The presence of historic trails that appear to have some antiquity and that traverse the uplands in the vicinity of the gorge also suggests some level of interaction among groups living to the south and north (Pollack and Crothers, 2005). Primary trails crossed the gorge area, but did not follow the New River itself due to the natural obstacles. Secondary trails also crossed the gorge, fording the river at different places.

■ **GMP, page 3-42, paragraph 3, line 1:**

One of the first recorded settlements within the park boundaries was Bowyers Ferry established in ~~1978~~ 1798 at the confluence of the New River and Manns Creek, which crosses east to west through Babcock State Park.

■ **GMP, page 3-52, Cultural Landscape Management Concerns, bullet 1:**

- **Gaps in Knowledge.** Additional research is needed to document ~~the~~ cultural landscapes in the park, particularly American Indian cultural landscapes.

■ **GMP, page 3-59, paragraph 2, line 5:**

Traditional use studies are needed to analyze traditional resource use and management regimes regarding:

- subsistence practices by the traditional American Indian and Euro-American populations ~~that~~ ~~who~~ continues to harvest natural resources for subsistence purposes

- **GMP, page 3-83, paragraph 1, line 4:**

Lower Glade Creek, including the 3-mile stretch from the pedestrian bridge to the New River, ~~has an apparently self-maintaining population of brown trout and is designated "catch-and-release"~~ is usually stocked on an annual basis with brown trout fingerlings.

- **GMP, page 3-83, paragraph 1, line 4:**

Buffalo Creek, which is designated "fly-fishing only", has ~~an apparently a~~ self-maintaining population of brook trout.

- **GMP, page 4-23, last paragraph, bullet 2:**

- removing man-made debris from floodplains following flooding events

- **GMP, page 4-31, paragraph 3, bullet 4:**

- removing man-made debris from floodplains following flooding events

- **GMP, page 4-70, paragraph 3, bullet 6:**

- removing man-made debris from floodplains following flooding events

- **GMP, page 4-81, paragraph 1, bullet 3:**

- removing man-made debris from floodplains following flooding events

- **GMP, page 4-133, paragraph 1, bullet 6:**

- removing man-made debris from floodplains following flooding events

- **GMP, pages 4-133 to 4-134, Alternative 3 Floodplain Impacts (Public Use, Enjoyment, and Experience Management Actions), Floodplain Impacts, third paragraph:**

~~At Surprise construction of new river access facilities would impact a mature oak-tulip poplar silverbell floodplain forest on Red Ash Island. Impacts on the floodplain forest would be mitigated by limiting visitor use facilities in the floodplain to the minimum possible, including an access road, an access trail, small drop-off area, disabled river~~

~~access, and launch site; the primary drop-off area, parking, staging areas, visitor changing/comfort stations, and picnic facilities would be located above Red Ash Island and outside of the floodplain at the base of the gorge wall. Collectively these new visitor use facilities would moderately affect natural floodplain values and minimally increase the use of the floodplain, resulting in a local long-term moderate adverse impact on floodplains.~~

- **GMP, pages 4-139 to 4-140, Alternative 3, Vegetation Impacts (Public Use, Enjoyment, and Experience Management Actions), fifth and sixth sentences:**

~~However, development of a new river access at Surprise would require limited clearing on Red Ash Island where a significant mature floodplain forest is present (dominant forest on the island is oak-tulip poplar/silverbell, with subdominant sycamore-ash floodplain forest and sycamore-river birch riverscours woodland). Future site planning and construction of new facilities would seek to minimize disturbance to forested land, particularly on Red Ash Island and where existing unmaintained trails are improved to provide official park trails.~~

- **GMP, page 4-141, paragraph 5, bullet 3:**

- removing man-made debris from floodplains following flooding events

- **GMP, pages 4-145 to 4-146, Alternative 3, Terrestrial Wildlife Impacts (Public Use, Enjoyment, and Experience Management Actions), fifth and sixth sentences:**

~~However, development of a new river access at Surprise would require limited clearing on Red Ash Island where a significant mature floodplain forest is present. Field survey prior to treatment actions would determine terrestrial wildlife species present in the vicinity of each visitor use site and the appropriate protection measures needed. Future site planning and construction of new facilities would seek to minimize disturbance to forested land, particularly on Red Ash Island and where existing unmaintained trails are improved to provide official park trails.~~

- **GMP, page 4-183, paragraph 1, bullet 6:**

- removing man-made debris from floodplains following flooding events

- **GMP, page 4-191, paragraph 3, bullet 3:**

- removing man-made debris from floodplains following flooding events

- **GMP, page 4-236, paragraph 1, bullet 6:**

- removing man-made debris from floodplains following flooding events

- **GMP, pages 4-236 to 4-237, Alternative 5, Floodplain Impacts (Public Use, Enjoyment, and Experience Management Actions), third paragraph:**

~~If a new river access is developed at Surprise (as in Alternative 3), some facilities would be located in the floodplain and would impact a mature oak-tulip poplar-silverbell floodplain forest on Red Ash Island. Impacts on the floodplain forest would be mitigated by limiting visitor use facilities in the floodplain to the minimum possible, including an access road, an access trail, small drop-off area, disabled river access, and launch site; the primary drop-off area, parking, staging areas, visitor changing/comfort stations, and picnic facilities would be located above Red Ash Island and outside of the floodplain at the base of the gorge wall. Collectively these new visitor use facilities would minimally to moderately affect natural floodplain values and minimally increase the use of the floodplain, resulting in either a local long-term minor adverse impact on the floodplain (without a new access at Surprise) or in a local long-term moderate adverse impact on the floodplain (with a new river access at Surprise).~~

- **GMP, page 4-238, Alternative 5, Floodplain Impacts, Cumulative Impacts, fourth and fifth sentences:**

~~Without a new river access at Surprise, Alternative 5 would contribute a moderate beneficial impact and an imperceptible adverse impact to the total cumulative long-term moderate adverse impact on floodplains; alternatively, if a new river access is needed at Surprise, then Alternative 5 would contribute a moderate beneficial impact and a minor adverse impact to the total cumulative long-term moderate adverse impact on floodplains.~~

- **GMP, page 4-238, Alternative 5, Floodplain Impacts, Conclusion:**

~~Management actions in Alternative 5 —without a new river access at Surprise— would result in local long-term minor to major beneficial impacts and local long-term minor adverse impacts on floodplains. If a new river access is needed at Cunard, then the management actions in Alternative 5 would result in local long-term minor to major beneficial impacts and local long-term minor to moderate adverse impacts on floodplains. Without a new river access at Surprise, Alternative 5 would contribute a moderate beneficial and an imperceptible adverse impact to the total cumulative long-term moderate adverse impact on floodplains; alternatively, if a new river access is needed at Surprise, then Alternative 5 would contribute a minor beneficial impact and a minor adverse impact to the total cumulative long-term moderate adverse impact on~~

~~floodplains. Regardless of whether a new river access is developed at Surprise, in In~~  
 Alternative 5 there would be no impairment of park resources or values related to floodplains.

- **GMP, pages 4-243 to 244, Alternative 5, Vegetation Impacts (Public Use, Enjoyment, and Experience Management Actions) first paragraph fifth and sixth sentences:**

~~However, development of a new river access at Surprise (if needed to address visitor crowding) would require limited clearing on Red Ash Island where a significant mature floodplain forest currently is present (dominant forest on the island is oak tulip poplar/silverbell, with subdominant sycamore ash floodplain forest and sycamore river birch riverscour woodland). Future site planning and construction of new facilities would seek to minimize disturbance to forested land, particularly on Red Ash Island and where existing unmaintained trails are improved to provide official park trails.~~

- **GMP, page 4-245, paragraph 2, bullet 3:**

- removing man-made debris from floodplains following flooding events

- **GMP, page 4-249 and 250, Alternative 5, Terrestrial Wildlife Impacts (Public Use, Enjoyment, and Experience Management Actions) first paragraph fifth and sixth sentences:**

~~However, development of a new river access at Surprise (if needed to address visitor crowding) would require limited clearing on Red Ash Island where a significant mature floodplain forest currently is present. Field survey prior to treatment actions would determine terrestrial wildlife species present in the vicinity of each visitor use site and the appropriate protection measures needed. Future site planning and construction of new facilities would seek to minimize disturbance to forested land, particularly on Red Ash Island and where existing unmaintained trails are improved to provide official park trails.~~

- **GMP, page A-10, table A.1, Line 4:**

1988	PL 100-466	102 Stat. 1782	<del>Authorizes NPS to undertake friendly condemnation-</del> <u>initiate condemnation with the consent of the owner of property, improved or unimproved, within the boundary or at a currently authorized administrative site.</u>
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- **GMP, pages F-4, F-5 and F-6, Vascular Plants, replace plant list with the following plant list:**

*Anemone quinquefolia* var. *minima* dwarf anemone S1 G5  
*Arabis hirsuta* var. *pycnocarpa* hairy rock-cress S2 G5  
*Arabis patens* spreading rock-cress S2 G3  
*Aristida purpurascens* var. *purpurascens* purple needlegrass S1 G5  
*Baptisia australis* var. *australis* wild false indigo S3 G5  
*Calopogon tuberosus* var. *tuberosus* grass pink S1 G5  
*Cardamine flagellifera* bitter cress S2 G3  
*Carex aestivalis* summer sedge S2 G4  
*Carex careyana* Carey's sedge S1 G4  
*Carex comosa* bearded sedge S2 G5  
*Carex emoryi* Emory's sedge S2 G5  
*Carex interior* inland sedge S1 G5  
*Carex mesochorea* midland sedge S2 G4  
*Carex molesta* troublesome sedge S3 G4  
*Carex nigromarginata* black-edge sedge S3 G5  
*Carex seorsa* weisk stellate sedge S1 G4  
*Carex styloflexa* bent sedge S1 G4  
*Carex suberecta* prairie straw sedge S1 G4  
*Carex typhina* cat-tail sedge S2 G5  
*Carex woodii* pretty sedge S2 G4  
*Commelina erecta* var. *angustifolia* slender day-flower S2 G5  
*Corallorhiza wisteriana* spring coralroot S2 G5  
*Coreopsis pubescens* var. *robusta* star tickseed S2 G5  
*Croton glandulosus* var. *septentrionalis* northern croton S3 G5T5  
*Cuscuta indecora* var. *neuropetala* pretty dodder S1 G5T5  
*Cymophyllus fraserianus* Fraser's sedge S3 G4  
*Cyperus refractus* reflexed flatsedge S3 G5  
*Cyperus squarrosus* awned cyperus S3 G5  
*Desmodium lineatum* sand tick-trefoil S1 G5  
*Desmodium pauciflorum* fewflower tick-trefoil S1 G5  
*Eleocharis compressa* flat-stemmed spike-rush S2 G4  
*Eleocharis intermedia* matted spike-rush S1 G5  
*Eleocharis palustris* creeping spike-rush S3 G5  
*Eriogonum allenii* yellow buckwheat S2 G4  
*Eupatorium pilosum* vervain thoroughwort S2 G5  
*Fibristylis annua* annual fimbry S1 G5  
*Galactia volubilis* downy milkpea S2 G5  
*Gentiana austromontana* Appalachian gentian S1 G3  
*Helianthemum canadense* Canada frostweed S2 G5

*Helianthus laevigatus* smooth sunflower S2 G4  
*Helianthus occidentalis* Occidentalis McDowell sunflower S2 G5T5  
*Hibiscus laevis* halfbred-leaved mallow S2 G5  
*Hypericum virgatum* coppery St. John's-wort S1 G4  
*Juncus dichotomus* forked rush S1 G5  
*Lythrum alatum* var. *alatum* winged-loosestrife S2 G5T5  
*Maianthemum stellatum* starflower false Solomon's-seal S2 G5  
*Melica mutica* two-flower melic grass S2 G5  
*Najas gracillima* slender water nymph S2 G5?  
*Oenothera pilosella* evening-primrose S2 G5  
*Pinus resinosa* red pine S1 G5  
*Piptochaetium avenaceum* blackseed needlegrass S2 G5  
*Platanthera psycodes* small purple-fringe orchid S1 G5  
*Poa saltuensis* drooping bluegrass S1 G5  
*Pogonia ophioglossoides* rose pogonia S2 G5  
*Polygala curtissii* Curtiss' milkwort S2 G5  
*Polygonum amphibium* var. *emersum* water smartweed S2 G5T5  
*Pycnanthemum loomisii* Loomis' mountain-mint S2 G4?  
*Pycnanthemum torrei* Torrey's mountain-mint S1 G2  
*Ranunculus pennsylvanicus* Pennsylvania buttercup S1 G5  
*Ranunculus pusillus* var. *pusillus* low spearwort S1 G5T4?  
*Rhynchospora recognita* globe beaked-rush S2 G5?  
*Salix lucida* ssp *Lucida* shining willow S1 G5  
*Saxifraga careyana* Carey saxifrage S3 G3  
*Schoenoplectus purshianus* weakstalk bulrush S3 G4  
*Scutellaria saxatilis* rock skullcap S2 G3  
*Sibara virginica* Virginia cress S2? G5  
*Sida hermaphrodita* Virginia mallow S3 G3  
*Silene nivea* snowy campion S1 G4  
*Silphium perfoliatum* var. *connatum* Virginia cup-plant S1 G5T3?  
*Solidago simplex* ssp *randii* Rand's goldenrod S1 G5T4  
*Spiranthes tuberosa* little ladies'-tresses S3 G5  
*Spiraea virginiana* Virginia spiraea S1 FT  
*Sporobolus clandestinus* rough dropseed S1 G5  
*Stachys nuttallii* Nuttall's hedge-nettle S3 G5?  
*Stachys tenuifolia* var. *tenuifolia* smooth hedge-nettle S3 G5  
*Thalictrum clavatum* mountain meadow-rue S1 G4  
*Triphora trianthophora* nodding pogonia S2 G3  
*Vitis rupestris* sand grape S2 G3

### 3.2 Additions to GMP References

The following citations should be added to the list of GMP references:

- Abrams, M.D.  
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- Lodge, D.M., C.A. Taylor, D.M. Holdich and J. Skurdal  
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- Maxwell, R.S. and R.R. Hicks.  
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### 3.3 Additions to GMP Appendices

#### Appendix A

Appendix A includes copies of all correspondence containing substantive comments on the Draft GMP/EIS for which responses are provided in section 2.1 above.

#### Appendix B

Appendix B includes copies of all other agency correspondence containing non-substantive comments on the Draft GMP.

### 3.4 Foundation Plan Text Corrections

- **Foundation Plan, page 20, Hydrologic – Aquatic Ecosystems, Current State and Related Trends, bullet 1:**

Only three game fish species (channel catfish, flathead catfish, and green sunfish) are considered native to the New River system in the vicinity of New River Gorge National River. Recent evidence suggests that a unique population of walleye in the upper New River in Virginia may be native (Palmer 1999; Palmer et al. 2007). All other game fish were introduced.

- **Foundation Plan, page 20, Hydrologic – Aquatic Ecosystems, Stakeholder Interest, bullet 4:**

~~A handful of~~ According to DNR Licensed Hunting and Fishing Guides (2009), 14 bait and tackle dealers have an economic interest in selling supplies and equipment to those who angle for non-native fish species.

- **Foundation Plan, page 28, Ecological – Unfragmented Forest, Importance, first bullet:**

NERI is located in the largest remaining example of mid-latitude forest in the world, and the portion of unfragmented forest within New River Gorge National River is a ~~globally~~ nationally significant resource.

- **Foundation Plan, page 32, Ecological – Habitat Mosaic/Plant Communities, Quality and Comprehensiveness of Relevant Existing Information, last bullet:**

The Vegetation Classification and Mapping Project (Vanderhorst 2007), characterized and mapped all 40 plant communities in the park. This study also documented the need for more research within the under-sampled linear plant communities found along riparian zones and cliff outcrops. The report also recommended further study into the fire regime of the oak/ericad and oak/hickory-sugar maple forests: fire suppression or lack of ignition sources may be responsible for the abundance of sugar maple in these forest types and for the current predominance of mesic species on the landscape identified the need for experimental prescribed burns in the xeric oak/ericad forest to retard the conversion into a more mesic cove hardwood forest.

- **Foundation Plan, page 43, Cultural – Places with Traditional Associations, Importance, first bullet:**

The park contains standing structures, ruins, place names, and natural resources, which are representative of traditional associated peoples' connection to it.

- **Foundation Plan, page 47, Cultural – Historic and Archeological Resources, Importance, third bullet, second sentence:**

These sites occur in a variety of upland and lowland settings and provide insights into the nature of ~~pre-contact~~ American Indian settlement, travel routes, and hunting and gathering and agricultural practices.

- **Foundation Plan, page 47, Cultural – Historic and Archeological Resources, Applicable Laws and Policies, Management Direction:**

The NPS will protect, preserve, and foster an appreciation and understanding of the history and archeology associated with the park's lumbering industry, state parks, and ~~pre-contact~~ Native American resources.

- **Foundation Plan, page 62, Summary of Park Legislation and Related Legislative Mandates, Line 4:**

1988 PL 100-466 102 Stat. 1782	Authorizes NPS to <del>undertake friendly condemnation-</del> <u>initiate condemnation with the consent of the owner of property, improved or unimproved, within the boundary or at a currently authorized administrative site.</u>
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## Appendix A

### Agency and Other Correspondence Received that Contains Substantive Comments

- Letter Received from American Whitewater ..... A-1
- Letter Received from Thomas R. Dragan ..... A-3
- Letter Received from West Virginia Wildwater Association  
(April 1, 2010) ..... A-4
- Letter Received from Float Fishermen of Virginia  
(March 2, 2010) ..... A-5
- Letter Received from Friends of the Rivers of Virginia  
(February 20, 2010) ..... A-6
- Letter Received from the U.S. Environmental Protection Agency  
(April 1, 2010) ..... A-7
- Letter Received from the West Virginia Department of Natural Resources,  
Wildlife Resources Section (March 26, 2010) ..... A-9
- Form Letter Received from Jason A. Bell ..... A-28
- Other Comments Received via the NPS Planning, Environment, and Public Comment  
Website ..... A-29



**Dear Superintendent Striker:**

Please accept the following as official comments on your current management plan revision. American Whitewater is a national nonprofit organization with roughly 6,000 members, many of which live in, and recreate in West Virginia and specifically the New River Gorge. Our mission is to protect and restore our nation's whitewater resources while enhancing opportunities to enjoy them safely. We are concerned with the conservation of the New River and its tributaries as well as preservation of the experiences these waterways provide for people exploring them in kayaks, canoes, and rafts. Factors influencing these experiences include viewshed and canopy cover, water quality and quantity, public river access, and ancillary activities like camping, hiking, biking, climbing, and historical appreciation.

The New River Gorge offers thousands of people the chance to experience powerful rapids in a protected natural setting each year, amidst a regional landscape otherwise dominated by human development. Paddlers have formed a close bond with the New River and several of its tributaries and generally desire the wild character of these waterways can be protected and enhanced. Large scale residential development, petroleum extraction, and water quality impacts threaten this bond and the incredible value that the New River Gorge National River provides the American public. We have reviewed the draft management plan for the New River Gorge National River and are generally supportive of the analysis and conclusions. We ask that you consider the following comments on the draft management plan and analysis.

**1. Wild and Scenic River Status**

We were unable to locate the Wild and Scenic River analysis in your planning documents. A 1979 Presidential Directive stipulates:

- Each federal agency shall, as part of its normal planning and environmental review process, take care to avoid or mitigate adverse effects on rivers identified in the Nationwide Inventory, prepared by the Heritage Conservation and Recreation Service in the Department of the Interior.
- Each Federal agency with responsibility for administering public lands shall, as part of its ongoing land use planning and management activities and environmental review process, make an assessment of whether the rivers identified in the Nationwide Inventory and which are on their lands are suitable for inclusion in the Wild and Scenic Rivers System, the agency shall, to the extent of the agency's authority, promptly take such steps as are needed to protect and manage the river and the surrounding area in a fashion comparable to rivers already included in the Wild and Scenic Rivers System.

It has since become common practice for all agencies to document consideration of eligibility for Wild and Scenic designation in planning processes. In our opinion several tributaries of the New River are potentially eligible for Wild and Scenic designation and thus should be listed in the Nationwide Rivers Inventory and protected as eligible rivers. In addition, some consideration of the suitability of the New River Gorge itself should have been conducted.

**2. River Access**

We appreciate the NPS proposal to provide high quality public river access to the New River Gorge, and to continue its support of small-scale backcountry paddling on tributaries. The draft

plan recognizes that the Gorge offers a wide array of high quality paddling opportunities, ranging from Class I floats to Class V adventures, and does a good job of providing for those opportunities.

The approach taken to building limited new river access capacity as needed seems highly appropriate. We also view the prompt addition of enhanced access to easier reaches of the New River as a very positive action in the proposed plan.

It appears that the through-park connector trail would offer paddlers highly desirable opportunities to bike their shuttles. Bike shuttles encourage carpooling and generally can enhance the paddling experience. Like others, we request that the NPS consider ways of providing safe access to the upper parking lot at Fayette Station, and provide a visual stream gage at the Cunard put-in.

### **3. Residential Development**

The selected alternative provides for purchase of private lands from willing sellers to protect the natural resources of the New River Gorge. We are strongly supportive of this component of the plan. We feel that the visual impacts of modern development within the viewshed of the New River itself would be a significant and unfortunate loss for the American people.

### **4. Land-Based Recreation**

The selected alternative provides high quality hiking, biking, camping, climbing and historical exploration opportunities for visitors. Many paddlers and their families engage in these activities when not on the water. The infrastructure proposed for these activities seem fitting for a unit of the National Park Service. As is the case with all development, we encourage the park to plan the infrastructure (ie trails) in a manner that is not visible or at most minimally visible from the river.

### **Conclusion:**

We have reviewed the documents relating to the proposed new General Management Plan for the New River Gorge National River. We are supportive of the National Park Service selected alternative at this time. We look forward to working with NPS staff as they implement this ambitious plan. Thank you for considering and protecting the interests of the thousands of people that each year seek solace and excitement on the New River and its tributaries in kayaks, canoes, and rafts.

Sincerely,

Kevin Colburn  
National Stewardship Director  
American Whitewater  
2725 Highland Drive  
Missoula, MT 59802  
406-543-1802  
[kevin@americanwhitewater.org](mailto:kevin@americanwhitewater.org)

National Park Service

Superintendent Don Striker

New River Gorge National River

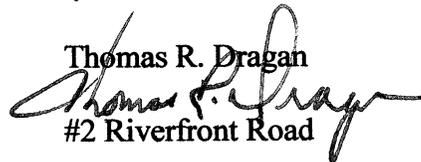
Glen Jean West Virginia

I have been wading through the final draft of the General Management Plan for the New River Gorge National River and read where the NPS mentioned the possibility of continued support for a scenic railroad between Thurmond and Mt. Hope with additional service being provided to other points east and west to include the West Virginia Turnpike and the newly established Boy Scout Facility "The Summit – Bechtel Family Scout Preserve." I applaud the National Park Service in their forward thinking. To utilize alternative forms of transportation while continuing to interpret the rich railroad history is important for the success of the New River Gorge National River.

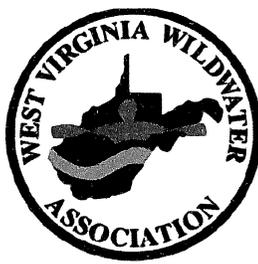
I would encourage the Park Service to also consider returning the "South Side Junction" railroad corridor to its turn of the century use of moving people and freight thru the gorge. The existing railroad bed on the left side of the river from near Thurmond to Cunard would be the perfect venue for an "alternative intermodal transportation system" which would serve all visitors to the New River Gorge. Unlike the proposed road creating just another put-in above surprise, the railroad could and would provide access to a larger and more diversified group of Park users.

Restoring the "South Side Junction" railroad corridor need not be a monumental task. There are many entraneurs who would partner with the Park Service to create such an exciting, innovative and practical solution to a difficult transportation issue. It takes both vision and courage to look into the future; I commend the management team for the New River Gorge National River with having both.

Sincerely,

Thomas R. Dragan  
  
#2 Riverfront Road

Thurmond West Virginia



Scotts \_\_\_\_\_

Don Striker  
Superintendent  
New River Gorge National River  
PO Box 246  
Glen Jean WV 25846

April 1, 2010

Subject: General Management Plan (GMP) for the New River Gorge

Dear Mr. Striker:

The West Virginia Wildwater Association provides the following comments regarding the development of the General Management Plan (GMP) for the New River Gorge.

Topic Question 1:

- FP, page 5-6: Under "Park Significance" we believe a 7<sup>th</sup> statement should be included that "The New River Gorge provides one of the finest whitewater recreation
- al experiences in the United States.

Topic Question 3:

- A river gauge is needed at the Cunard access area. The gauge would help boaters understand the current level and flow (feet and cfs) of the river when they are launching to run from there to Fayette Station
- Boaters who park in the upper parking lot at Fayette Station need a safe way to access their vehicles after they get off the river. Their only option at this time is to carry their watercraft across the active railroad tracks.

Topic Question 5:

- GMP, Part I, page 1-21: Development that would affect the viewshed is a continuing threat to the park. As adequate protection is not being provided by Fayette County, the NPS should expand park boundaries and increase land purchases.
- GMP, Part I, page 1-21: Greater effort should be made to preserve rapidly disintegrating historical resources, especially those facilities within view of the paddlers on the river. A priority example would be the old post office and general store at Lower Kaymoor.
- We note that the GMP nor the Water Resources Management Plan, New River Gorge... (Purvis 2002) addresses the issue of water *quantity* in the Gorge. Increasing withdrawals upstream will continue to impact low Gorge flows unless addressed.

We hope these comments will contribute positively to the dialogue concerning the Gorge GMP. Thank you and your staff for working so hard on the Draft GMP and for all of the work that you do to maintain and improve the New River Gorge National River.

Sincerely,

*Bridget Tincher*

Bridget Tincher

President – West Virginia Wildwater Association (WVWA.net)

PO Box 8413

South Charleston, WV 25303



March 2, 2010

Superintendent  
New River Gorge National River  
PO Box 246  
Glen Jean WV 25846

Dear Park Superintendent:

The Float Fishermen of Virginia (FFV) provides the following comments regarding the development of the General Management Plan (GMP) for the New River Gorge.

Topic Question 2:

We strongly support alternative 5.

Topic Question 3:

- The Cunard access needs a gauge to improve safety and convenience. Many boaters put in unaware of the accurate levels of the river, which increases the risk of injury.
- The Cunard access needs a takeout for private boaters so they do not have to carry canoes up the stairs. This is a dangerous way to take out and is so difficult for many that they do not use the stairs at all.
- GMP, Part I, page 1-23 & 1-43: The NPS should pursue means to allow pedestrians to cross the railroad tracks at grade to access parking for boaters at Fayette Station. Landowner liability laws should be researched to develop an appropriate state or federal law. (See Va Code 29-1-509). We would be glad to help with this matter.

Topic Question 5:

- GMP, Part I, page 1-21: Please preserve critical historical resources, especially those within view of the paddlers on the river. An example would be the old post office and store at Lower Kaymoor at track level.
- The GMP does not address the issue of water *quantity* in the New River. Over time withdrawals upstream will increase the severity and frequency of low Gorge flows unless mitigated.

Thank you for the opportunity to comment on the New River Gorge GMP.

Sincerely,

Don Sims  
President

FFV-Gorge GMP-comments-3-2-10

February 20, 2010

FORVA DIRECTORS

William Tanger, Chair  
*Friends of the Roanoke River*  
Rick Roth, Treasurer  
*Friends of the New River*  
Del. Watkins Abbitt  
*Float Fishermen of Virginia*  
Corbin Dixon  
*Trout Unlimited*  
Karen Firehock  
*FORVA*  
Bobbie Hinkins  
*Friends of the North Fork  
of the Shenandoah*  
Patti Jackson  
*FORVA*  
Randi Lemmon  
*National Committee for  
New River*  
Tom Miller  
*Float Fishermen of Virginia*  
Glenn Rose  
*FORVA*

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Bob Born  
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*Jackson River Defense Fund*  
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*FORVA*  
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*FORVA*  
Jerry Lovelace  
*FORVA*  
Nelson Mackey  
*Float Fishermen of Virginia*  
Erin Miles  
*Citizens for the Preservation  
of the River (CPR)*  
Donnie Mohler  
*Float Fishermen of Virginia*  
Thomas Newcomb  
*Float Fishermen of Virginia*  
Trace Noel  
*Virginia Paddlesports Association*  
Cole Poindexter  
*Staunton River Watch*  
Tom Stutts  
*Friends of the Staunton*  
Steven Tingle  
*Headwaters Watch*  
John Tippet  
*Friends of the Rappahannock*  
Greg Turner  
*Blue Ridge River Runners*  
Charles Vandervoort  
*Friends of the Shenandoah*  
Jeff Wold  
*Float Fishermen of Virginia*

Superintendent  
New River Gorge National River  
PO Box 246  
Glen Jean WV 25846

Dear Park Superintendent:

Friends of the Rivers of Virginia (FORVA) provides the following comments regarding the development of the General Management Plan (GMP) for the New River Gorge.

## Topic Question 1:

FP, page 5-6: Under "Park Significance" we believe a 7<sup>th</sup> statement should be included that "The New River Gorge provides one of the finest whitewater recreational experiences in the United States." This aspect is given short shrift in the Foundation Plan.

## Topic Question 2:

We support alternative 5.

## Topic Question 3:

- The Cunard access needs a gauge for the purposes of safety and convenience. This is where most boaters put in and often they are unaware of the true levels of the river, posing an unnecessary risk.
- GMP, Part I, page 1-23 & 1-43: The NPS should pursue legislation or other means to allow pedestrians to cross the railroad tracks at grade to access parking for boaters at Fayette Station. Analysis of landowner liability laws should be done to develop an appropriate state or federal law. (See Va Code 29-1-509)

## Topic Question 5:

- GMP, Part I, page 1-21: Development that would affect the viewshed is a continuing threat to the park. As adequate protection is not being provided by Fayette County, the NPS should expand park boundaries and increase land purchases.
- GMP, Part I, page 1-21: Greater effort should be made to preserve rapidly disintegrating historical resources, especially those facilities within view of the paddlers on the river. A priority example would be the old post office and general store at Lower Kaymoor.
- We note that neither the GMP nor the Water Resources Management Plan, New River Gorge (Purvis 2002) addresses the issue of water **quantity** in the Gorge. Increasing withdrawals upstream will impact low Gorge flows unless addressed.

We hope these comments will contribute positively to the dialogue concerning the Gorge GMP. Thank you for all the fine work you do in the Gorge.

Sincerely,



Bill Tanger, Chair

PO Box 1750, Roanoke VA 24008 ~ Tel 540-266-0237



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION III  
 1650 Arch Street  
 Philadelphia, Pennsylvania 19103-2029

April 1, 2010

Mr. Don Striker, Superintendent  
 New River Gorge National River  
 104 Main Street  
 P.O. Box 246  
 Glen Jean, WV 25846

Re: Draft General Management Plan and Environmental Impact Statement for New River Gorge National River West Virginia, 2009 CEQ #20100018

Dear Mr. Striker:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the New River Gorge Draft General Management Plan (GMP) and Environmental Impact Statement (EIS). The purpose of this GMP/DEIS is to provide a decision-making framework that ensures that management decisions effectively and efficiently carry out the National Park Service (NPS) mission at the New River Gorge. It will guide management decision making at the park for the next 15 to 20 years. The current park boundary is comprised of 72,189 acres. The existing GMP assigns management zoning to approximately 11,000 acres. Based on our review, we offer the following comments for your consideration. EPA has rated the environmental impacts of the DEIS as EC (Environmental Concerns) and the adequacy of the impact statement as 2 (Insufficient Information). A description of our rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

**Alternatives:**

This document describes five alternatives for future management of New River Gorge National River (Alternative 1-current conditions and four action alternatives). Five broad organizing principals are inherent in each of the action alternatives: visitor experience, natural resource management, cultural resource management, visitor use and visitor facilities, and partnership and cooperative actions.

Alternatives 2 to 5 would have negligible or long-term minor to moderate adverse impacts. The total estimate disturbance area associated with the alternatives range from 180 acres for Alternative 4 to 320 acres for Alternative 5. Best management practices and mitigation measures would be used to reduce the magnitude of anticipated impact to park resources.



Alternative 5 is the preferred alternative. This alternative preserves areas for primitive recreational experiences from end to end of the park. It also includes a north-south thru park connector composed of improved scenic roads and trails that would enable visitors to travel the length of the park; 66.4 % of the park would be managed as back country. Alternative 5 provides the highest degree of protection of park's natural and cultural resources. Approximately 104 miles of new park trails would be developed, mostly by improving existing unmaintained trails, 34 small parking areas to provide trailheads for hikers, climbers, and horseback riders, mostly on existing roads and disturbed areas, two new parking areas would be developed in support of a visitor shuttle system, three new river access and related day use areas would require clearing and alteration of the riparian zone at the river edge, additional campgrounds will be developed/expanded. A new park road on the Highland-Backus Plateau would be developed through expansion of an existing unmaintained road and minor improvements to the existing administrative road to Surprise. Four existing campgrounds in the floodplain would be restored.

**Comments:**

While this is a management plan and lacks details about specific impacts, additional information should be provided about next steps and NEPA documentation for various projects. We look forward to working with NPS as the projects move forward. The team should look for additional opportunities to avoid and minimize environmental impacts.

Additional information should be included about improvements to area roads and how that will be coordinated with transportation agencies; for example, on page 4-281, "improvements would be made to WV Route 25 from Glen Jean to Southside Junction and to WV Route 25/2 within the town itself."

On page 4-237, it is stated that "if a new river access is developed at Surprise (as in Alternative 3), some facilities would be located in the floodplain and would impact a mature oak-tulip poplar floodplain forest on Red Ash Island. Impacts on the floodplain forest would be mitigated by limiting visitor use facilities in the floodplain to the minimum possible, including an access road, an access trail, small drop off area, disabled river access, and launch site..." It is unclear how the decision would be made about this location in Alternative 5. If this facility is built, additional efforts should be made to avoid and minimize impacts to this area.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,



Barbara Rudnick  
NEPA Team Leader





**DIVISION OF NATURAL RESOURCES**  
**Wildlife Resources Section**  
**324 Fourth Avenue**  
**South Charleston WV 25303-1224**  
**Telephone (304) 558-2771**  
**Fax (304) 558-3147**  
**TDD 1-800-354-6087**

**Joe Manchin III**  
**Governor**

**Frank Jezioro**  
**Director**

March 26, 2010

Mr. Don Striker, Superintendent  
 New River Gorge National River  
 P.O. Box 246  
 Glen Jean, WV 25846

Re: New River Gorge National River Draft General Management Plan and  
 Environmental Impact Statement, 2009

Dear Mr. Striker:

Pursuant to your request of February 12, 2010, personnel from my Game Management, Fish Management, Wildlife Diversity and Environmental Coordination Units have reviewed those portions of the referenced document that were pertinent to their fields of expertise and provide the following comments. For ease of understanding, they are listed as page (p) and comment (C).

**Draft Foundational Plan**

p. 20 – Current State and Related trends

- C Add Walleye (*Stizostedion vitreum*) to the native fishes list.
- C There are a number of inferences that non-native fishes probably led to decreases in native species diversity etc. These statements should either be corroborated with data, literature or removed from the document as they are anecdotal.
- C There is a need to attribute the spraying of Bti to the WV Department of Agriculture to identify the State agency that administers the program and applies the pesticide.

Mr. Don Striker, Superintendent  
New River Gorge National River  
March 26, 2010  
Page 2

p.20 – Potential Threats

- C Add in – Addition of hydropower at Bluestone Dam has the potential to adversely impact fisheries and other aquatic resources by altering flows and thermal regimes leading to the loss of downstream productivity provided by the surface outflow of the Dam.

p.20 - Stakeholder Interests

- C We reject the continued use of “non-native” when referring to the game fish species of the New River. Most, if not all, were introduced many, years ago and the public greatly enjoys them.
- C The statement says “...rely on non-native gamefish” is not totally true because some of the groups listed are trout groups and brook trout are native to most small streams in WV. Additionally, many anglers pursue the two native catfish species and the walleye which is also native.
- C How many are a handful? This statement needs to be more precise when referring to the number of outfitters.

p. 21 - Applicable Laws and Policies; “The management of populations of non-native aquatic species, up to and including eradication, is undertaken wherever such species threaten native aquatic species and communities and when control is prudent and feasible.”

- C The protection and management of all aquatic species lies solely with the WVDNR and it remains our contention that NPS lacks jurisdiction for management or “eradication” of any aquatic species within the New River or its tributaries.

p. 28; Absence of natural fire may be negatively impacting rimrock plant communities and oak/hickory forest. It is suggested that the suppression of fires since the 1920s, and increased deer browse, has lead to the encroachment of mesic cove hardwood species into the drier oak/hickory forests which were probably perpetuated by periodic fires.

- C There are few “natural” fires in this region of the National River. Ignitions are almost entirely anthropogenic.

p. 32; The Vegetation Classification and Mapping Project (2007), characterized and mapped all 40 plant communities in the park. This study also documented the need for more research within the under-sampled linear plant communities found along riparian zones and cliff outcrops. The report also identified the need for experimental prescribed

Mr. Don Striker, Superintendent  
 New River Gorge National River  
 March 26, 2010  
 Page 3

burns in the xeric oak/ericad forest to retard the conversion into a more mesic cove hardwood forest.

- C If this refers to Vanderhorst et al. (2007), it is incorrect. This report did not identify the need for experimental prescribed burns.

p. 60 - Public Law 100-71

- C The WVDNR does not control the spraying of Bti; this is done by the Department of Agriculture.

### **General Mangement Plan**

p. vii – Paragraph 3, “hunting in accordance with applicable state regulations has not caused adverse effects on any of the species of mammals or birds that....”

- C Interestingly, the wildlife populations that existed on the area now known as New River Gorge National River are a direct result of state management. Not only have wildlife species “*not been adversely affected*,” they have thrived under the biologically determined seasons and bag limits. We suggest that, instead of begrudgingly admitting that hunting has not hurt anything, the NPS eliminate the bias and embrace the fact that well regulated hunting is a good thing.

p. viii – First bullet, create/restore early successional habitat...

- C We also support the creation and restoration of early successional habitat, but do not see the necessity of limiting it to “historic resource zones.” Some of the “back country” areas currently have early successional habitat which should be maintained for those species that require it (see comments on PIF species below) and the public who enjoys them.

Second and third bullet

- C While we look forward to a collaborative effort as it applies to game and harvest management on the Park, our resources are limited and we may be unable to participate to the degree NPS envisions.

p. 1-6 - The expanse of mixed mesophytic forest that covers most of the park is part of the largest remaining area of mid-Atlantic forest in the world.

- C This portion needs editing: the expanse of forest that covers much of the gorge slopes is part of the largest remaining area of mixed mesophytic forest in the world. This would also need a citation (not Vanderhorst et al. 2007).

Mr. Don Striker, Superintendent  
New River Gorge National River  
March 26, 2010  
Page 4

p. 1- 8, Figure 1.2

C This figure indicates that hunting is currently allowed in certain designated areas delineated in purple stippling. Contrary to statements from Park staff who indicated most of the Park is open for hunting, we find there is a significant amount of NPS owned land not designated as huntable, seemingly without justification. Concern has been raised that safety zones may eliminate acreage from hunting. We strongly encourage NPS to assess levels of conflict prior to making spontaneous decisions. Some boundaries appear to be arbitrary straight lines that often cross the middle of owned parcels. It appears at least some of these boundaries do not follow roads, streams, etc. and we would be interested in the basis for their delineation.

p. 1-20 – “restoring important extirpated species”

C We are interested in knowing which extirpated species the NPS seeks to restore.

p 1-29 - a few scattered Palustrine forested wetlands, Palustrine scrub-shrub deciduous wetlands, and Palustrine emergent wetlands in upland areas.

C There are more than a few; our records indicate 92 Forest Seep polygons and 28 Beaver Influenced wetland polygons.

p. 1-34 - Climate models suggest that one of the region’s major forest types, maple/beechn/birch, is very likely to be completely displaced by more southern forest types.

C The maple/beechn/birch forest is more typical of higher elevations than what is found on the NRGNR. We recommend occurrence of this community be documented with a citation.

p. 1-49 - Glade Creek Area, first paragraph, “elimination of vehicle travel on the I-64 service road is proposed.”

C This will eliminate trout stocking by the Glade Pinch Trout Association using a pickup truck and a hauling tank. They travel this road approximately seven times each year and cause minimal, if any, impact. The “road” is actually an abandoned railroad grade used during early logging operations. We oppose its elimination.

Second paragraph, “I-64 service road is closed to motor vehicles.”

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- C “Except for WVDNR approved stocking vehicles” should be added to this statement.

p. 2-26 – Table 2.6

- River Corridor**  a nearly continuous strip of natural riparian habitat occurs along the river and small stream banks  
 bars in the river are protected  
 cobble and flatrock communities persist  
 prescribed fire occurs in fire dependent Ecosystems

- C There are no fire dependent ecosystems in the river corridor.

p. 2-29 - Table 2.8 - Overall Park Management, Segment 4, first bullet

- C Removal of man-made obstructions such as the bridge piers mentioned in this statement will result in harm to the ecosystem. We are unaware of any method that allows for removal of such obstructions without likely negative impacts to the New River. As such, no in-stream work should be allowed and the obstructions should remain.

p. 2-31 – Table 2.8, Segment 6, fourth bullet

- C This statement is beyond the scope of authority for the National River. The WVDNR has jurisdiction for fishery management and will determine, by application of appropriate research, what species will be stocked or not stocked into the New River and its tributaries; see also Section 1106 Paragraph 2 of Public Law 104-333(1996).

p. 2-31 – Table 2.8, Segment 6, fifth bullet

- C This statement is beyond the scope of authority for the National River. The WVDNR has jurisdiction for fishery management and will determine what actions will be implemented or curtailed in the management of the fishery of the New River and its tributaries including stocking of non-native species.

p. 2-31 – Table 2.8, Segment 7 - wetlands, seeps and vernal pools

- C We are unclear as to what the blanks in the Changes Needed column mean; i.e., is there a lack of knowledge of how to avoid, minimize, restore and mitigate these areas or because the current condition is acceptable? The Desired Condition of wetlands, seeps and vernal pools is directly affected by many of the elements in this table i.e., water quality, trails, chemical treatments, non-native species, roads

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etc. and the impacts of these elements on those aquatic resources should be addressed.

Please note that in all tables that list Glade Creek Back Country, the “changes needed” column states studies will be done to determine impacts of trout stocking. While we encourage fully coordinated research of any kind, we contend that fish management authority lies with the WVDNR and not the NPS.

p 2-32 – Table 2.8

- C We recommend that additional planning attention be given to early-successional stage habitat and management. Currently, this management type is relegated to a sub-unit within the broader contiguous forest category. While we recognize that the Park is predominately forest and that this categorization makes sense, the decline of early successional habitat and the species that depend on it within this Bird Conservation Region warrants discussion on its own. Although forest fragmentation has had a deleterious effect on forest interior birds, populations of those species that depend on early successional stage habitat are in even worse condition within this Region. Therefore we should not waste management opportunity where and when it is available, i.e., managing existing or easily manageable early successional openings, especially those that lie peripheral to the forest. Identification of suitable areas and management strategies could be developed as a stand alone category.

p. 2-37, Table 2.8, third bullet

- C Resources are not available for inclusion of area specific, federal regulations, e.g., National Forest, National Wildlife Refuge or Park Service regulations in our annual hunting and trapping regulations.

P 2-46  **Wildland Fire Management (Alternatives 2 to 5)**

Promotion of ecosystem health could be facilitated by application of prescribed fire as a management action in fire dependent forest communities to promote native vegetation diversity. For example, the following vegetation community types could benefit from the use of prescribed fire:

**Management Guidance and Actions Common to Alternatives 2 to 5**

- rim pine (Virginia pine, pitch pine) communities
- xeric oak forests

- C Virginia pine is fire sensitive. It is doubtful whether xeric oak forests are fire dependent and recommend documentation and inclusion of citation. Clifftop

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pitch pine may be edaphic, not dependent on fire. Fire also has negative effects on “ecosystem health” including erosion, carbon emissions and other air pollution, etc.

p. 2-51-55 Public Safety

- C Public safety has been repeatedly referenced in this section. A quick review of the Hunter Incident Clearinghouse revealed that from 2002 through 2007 West Virginia incurred 54 non-fatal and five fatal hunting incidents, statewide. Examining the incidents reveals that many are self-inflicted; hunters falling out of tree stands and carelessly handling a firearm, while others involved heart attacks or being injured in or around their vehicle or camp. Given that hundreds of thousands of hunters are spending literally millions of hours afield annually, this incident rate is remarkably low and confirms that hunting is of little danger to the public. Should NPS staff desire to address the real risk to non-hunters, this section’s discussion of public/visitor safety should be tempered with verifiable, factual information.

p. 2-54 - Enhanced Hunting Program (in Alternative 5)

- C Increasing upland game bird habitat by creating/restoring early successional habitat in historic resource zones is an action that is compatible with more than Alt 5. We recommend early successional stage habitat creation as a component of Alt 1 and 2 as well. Such would be an appropriate double-use of already impacted habitat.

p. 3-16, 3-17, 3-18, 3-20, etc. (Vanderhoorst 2007)

- C Vanderhorst is misspelled throughout the document.

p. 3-18 - Aquatic Plants; paragraph 2 line 7

- C The plant referenced as Elodea may in fact be hydrilla which is very common in Bluestone Lake and was probably introduced by boaters.

p. 3-18 - Of the park’s rare or significant vegetation communities the juniper-Virginia pine flatrock woodland (high Appalachian flatrock) community is most rare. It is a globally rare ecological community that is composed of locally rare sedges, cedars, pines, and other plants. It occurs in two locations within the park on flat sandstone ledges along the New River and is dependent on the scouring caused by occasional flooding for its long-term integrity (Buhlmann et al. 1987).

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- C There are no rare pines or cedars in this community, however, one state rare sedge is known. There are, however, some rare grasses and forbs: Rare plants tracked by West Virginia Natural Heritage Program which have been documented in this community by past surveys include *Aristida purpurascens* var. *purpurascens* (arrowfeather threeawn), *Carex woodii* (pretty sedge), *Commelina erecta* var. *angustifolia* (whitemouth dayflower), *Coreopsis pubescens* var. *robusta* (star tickseed) (in ecotone with mowed field), *Galactia volubilis* (downy milkpea), *Hypericum virgatum* (coppery St. Johnswort), *Melica mutica* (twoflower melicgrass), and *Piptochaetium avenaceum* (blackseed speargrass).

**p. 3-20 - Fire Management.** A comprehensive fire history for the park needs to be developed to help determine the historic role of fire in maintaining and/or creating selected vegetation communities (Mahan 2004). Forest composition research indicates that oak is not regenerating within the park (Fortney et al. 1995). Oak stands are being replaced by mixed-mesophytic species such as maple, tulip poplar, and black gum; a history of fire suppression probably has limited oak regeneration (Mahan 2004). Virginia pine and pitch pine are declining throughout their range, especially along cliffs and within the Appalachian flatrock communities within the park probably due in part to an absence of fire (Mahan 2004).

- C WV Wildlife Resources Section staff ecologists believe oak is regenerating in the park as evidenced by plot data but agree there is probably less oak regeneration now than in the early 1900s following anthropogenic fires, logging, and mining. While total cover by oak appears to be waning, it still is probably much greater than it was pre-settlement because anthropogenic fire was not part of the natural disturbance regime of the Appalachian flatrock communities.

It is mentioned that forest species composition is changing in the New River Gorge to species that are more mesic in nature. We encourage you to read Abrams 1992,<sup>1</sup> Abrams and Nowacki 2008<sup>2</sup> and Nowacki and Abrams 2008.<sup>3</sup> All three articles discuss the role of fire in shaping and maintaining the forests that we have today. In addition, you should read Brose and Van Lear 1998<sup>4</sup> which discusses the role of fire in regenerating oak forests.

**p. 3-20 - Exotic Insects and/or Diseases.** Several exotic insects have impacted the park's vegetation. Oak mortality by gypsy moths (*Lymantria dispar*) may be partially

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<sup>1</sup> Abrams, M.D. Fire and the development of oak forests. *Bioscience* 42, 346-353.

<sup>2</sup> \_\_\_\_\_ and G.J. Nowacki. 2008. Native Americans as active and passive promoters of mast and fruit trees in the eastern USA. *The Holocene*. 18(7) 1123-1137.

<sup>3</sup> Nowacki, G.J. and M.D. Abrams. 2008. The demise of fire and "mesophication" of forests in the eastern United States. 58(2) 123-138.

<sup>4</sup> Brose, P.H. and D.H. Van Lear. 1998. Responses of hardwood advance regeneration to seasonal prescribed fires in oak-dominated shelterwood stands. *Canadian Journal of Forest Resources*. 28. 331-339.

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responsible for decline in oak in the park (Mahan 2004). Defoliation attributed to gypsy moth has declined dramatically over the last decade due to the introduction of a fungus that is fatal to the pest and due to the application of lethal bacteria. Occasional outbreaks of gypsy moth populations are still possible. The ridges, south-facing aspects, and dry plateau areas with significant oak component have the potential for being most affected (Mahan 2004).

- C Oak mortality by gypsy moth is likely to increase oak regeneration because of the increase in sunlight hitting the forest floor. It remains to be seen, however, if initial regeneration will survive to tree stage. Gypsy moth – caused oak mortality has increased in West Virginia in recent years. The WV Division of Forestry could have accurate figures on the numbers of acres impacted. In addition, we have found gypsy moth egg masses on Beury Mountain WMA, which borders the New River Gorge. The other two major insect threats to the New River Gorge are the emerald ash borer and the hemlock wooly adelgid.

p. 3-20 – Deer Over-browsing

- C While anecdotally we might agree, there is no evidence cited or presented to indicate that deer over-browsing is causing the lack of oak regeneration in the New River Gorge. Oak is moderately shade-tolerant. The lack of oak regeneration can be directly linked to a lack of canopy disturbances that create diffuse shade on the forest floor and the complete elimination of fire. Deer thrive in edge habitat created by forest management and agriculture. With the exception of some of the old farm areas that have been purchased by NPS, most of the New River Gorge would not be classified as “good” deer habitat.

p. 3-21 - Kudzu is a very pervasive nonnative plant in the park that threatens natural communities as well as cultural resources.

- C Kudzu is not pervasive in the park. It is mostly limited to a few disturbed sites where it was introduced for ground stabilization. Kudzu is currently declining at these sites in response to control efforts. It does not appear to invade natural communities in the park, but this could change in the future.

p. 3-22, Aquatic Wildlife, Section – Fish, Paragraph 2 Line 1

- C We are not sure the species specific overall abundance data presented is totally correct. Several game fish species are not listed and should be fairly common, i.e., rock bass which should be more common than either channel or flathead catfish.

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p. 3-22, Aquatic Wildlife, Section – Fish, Paragraph 2 Line 5

- C Only a few of the tributaries actually have brook trout present, however many have fishable brown trout populations which were established through fingerling stockings. Limited brown trout reproduction has been documented from Fat Creek, Piney Creek, and possibly Glade Creek. Some tributaries support a put and take trout fishery; therefore, both brown and rainbow trout should be listed here.

Page 3-23, Paragraph 1 Last line

- C We have no documented occurrences of a Rudd (*Scandinius spp.*) within the New River or within West Virginia that we know of. The citation is based on suspect data from 1991 that has never been verified. Neither the NPS nor the WVDNR have documented Rudd from the New River.

p. 3-23, Gamefish, Paragraph 1 line 8

- C Native game fish species should also include the native strain of walleye as documented by recent studies.

p. 3-23, Paragraph 2 Line 5

- C Proceeding downstream from Bluestone Dam, no data collected by the WVDNR indicates decreasing smallmouth abundance. The NPS statement is based on one citation from 1995. Because of natural population fluctuations within and between years on riverine systems, one discrete survey cannot be used to describe any fishery. Our data indicate bass closer to the dam benefit from the increased productivity of the surface water outflows of the dam. Bass and other species exhibit faster growth rates immediately downstream of the dam. As you proceed downstream and the productivity is depleted, the bass further downstream will be slightly smaller at the same age as those upstream.

p. 3-23, Paragraph 4 Line 7

- C The catch and release regulation applies to all black bass species so spotted bass should be included.

p. 3-24, Paragraph 1 Line 4 – “It is believed....”

- C Our data contradicts the NPS belief. WVDNR tagging studies demonstrated that trout released in put and take streams are not caught out quickly and a certain

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portion will remain within the stream for a significant period of time, typically months not weeks. Trout remain in most of these tributaries year-round.

Paragraph 1 Line 6

- C The population of brook trout in Buffalo Creek is self-sustaining and not apparently self-sustaining. Mill Creek should also be added to this statement.

Paragraph 1 Line 8

- C The brown trout population within Glade Creek is not self-sustaining and is supported by annual stocking of fingerling brown trout.

p. 3-24 – Aquatic Invertebrates, Mussels

- C The WVDNR has a permanent mussel monitoring station at Thurmond which is rich in mussel fauna and mussels have been found in a number of sites on the river. Because Thurmond is downstream of Glade Creek, we are unsure about the Jirka et al. citation which apparently stated they were not. For current data on mussels, contact the WVDNR malacologist Janet Clayton (304) 637-0245.

p. 3-25, Black Fly Larvae

- C The statement that black fly larvae are an important food source for smallmouth bass should be documented as to the source of this information.

p. 3-25, Fishery Management, Paragraph 1 Line 3

- C Not only does the enabling legislation permit the WVDNR to stock fish in consultation with the Secretary of the Interior, but it states “*Nothing in this Act shall be construed as affecting the jurisdiction of the state of West Virginia with respect to fish and wildlife.*” Because ultimate authority to manage the state’s water and wildlife lies statutorily with the WVDNR, this whole paragraph might be better served by rewording it to state that NPS is concerned with stocking non-native fish species and will work with the state to identify, support and implement site specific research that qualifies and quantifies that concern. We question the motivation to manage for only native fish species in a river system that is comprised of 48 percent non-natives. It appears this may be an insurmountable task, however, there may exist certain tributaries where this is not the case and applied research could be conducted.

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p. 3-26, Paragraph 2 Line 1

- C We know of no bait dealers that buy crayfish from sources significantly outside of the general area and it is our understanding that most, if not all, are caught and sold by local bait dealers. Data demonstrating that escaped or dumped bait stocked the river should be identified and cited.

Paragraph 2 Line 3

- C Because this is an incomplete sentence, we are unsure of the intent. Within the discussion of non-native crayfish, we are unaware of smallmouth bass being discriminatory; however we would be interested in an elaboration of research demonstrating that behavior or quantifying the perceived threats of these non-natives.

Paragraph 3, Bti Application, Line 4

- C We are unaware of adult smallmouth bass feeding on black fly larva and are unsure if this is a reference to young of the year bass. If it is the former, a citation should be provided documenting the statement. Our data indicate robust populations of smallmouth bass throughout the river and we have no evidence of negative impacts of Bti spraying on the game fish that we monitor.

p. 3-27 - White-tailed Deer

- C Deer harvest regulations vary based by county (Summers and Raleigh) and location, i.e., Fayette County antlerless deer harvest regulations are different east of the river versus west. WVDNR 2003 is not a useful citation and is listed in the references as our agency web address. The reference would be considerably more valuable if it cited the web page where the information is found. As a rule we do not report deer densities for individual counties.

p. 2-27 - Black Bear

- C Based on winter den surveys, average litter size for bears in southern WV is 2.85, not 3.

p. 3-28 - Fur-bearing and Other Mammals

- C Beaver, mink, muskrat, and river otter are all native to the New River. Beavers and otters were reintroduced by the WVDNR.

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p. 3-29 Birds: While some species are dependent on mature, unfragmented forests, others depend on small (<1 ha {2.47 ac}) forest gaps created by tree falls and other natural and/or human induced disturbances (e.g., logging, land clearing around abandoned mine sites). These forest gaps contain early successional communities and add species and structural diversity to the forest landscape.

C Small gaps are best considered as inclusions within surrounding forests, not as a separate early successional type. They represent opportunities for release of shade intolerant tree species, such as oaks. Older forests will reestablish a gap disturbance regime.

p. 3-29 Neotropical Migratory Birds

C The golden-winged warbler is listed as a bird that occurs in the New River Gorge that is on the Partners In Flight (PIF) watch list. It is mentioned that one ha canopy gaps are necessary to maintain the golden-winged warbler. To document the means of achieving long-term positive support of Neotropical migrants such as the golden-winged warbler, we recommend NPS describe how one ha canopy gaps will be created and maintained in the scrub-shrub stages of succession that the golden-winged warbler needs.

p. 3-30 - Wild Turkey

C The harvest numbers presented are eight years old and should be updated to reflect more timely data. We continue to contend that the poorly delineated boundary lines will significantly contribute to the low number of game animals checked in from the Park. Many hunters do not know they are hunting on NPS property and a hunter survey will do nothing to solve this problem.

p. 3-33 - Running buffalo clover (*Trifolium stoloniferum*) is a federally endangered species that has reportedly been found on the Cotton Hill floodplain in the park (Mahan 2004).

C This site is not in the Park nor is this species known from the Park.

p. 3-33 - Two state-designated plant species are under consideration for federal listing as threatened or endangered. Steele's meadow rue (*Thalictrum steeleanum*) is found in three locations in the park on well-drained slopes with relatively open understory. Bittercress (*Cardamine clematidis*) may be present on the New River floodplain near Stone Cliff, although there is uncertainty as to whether the species present is actually *Cardamine flagellifera*; both *Cardamine* species are southern Appalachian endemics that reach their northern limit in West Virginia and are found only within the park in West Virginia.

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C There are no “state-designated” plant species, although WVDNR does track distribution and status of selected rare species. According to Harman et al. (2006),<sup>5</sup> *Cardamine clematitis* and *Cardamine flagellifera* are synonymous. WVDNR tracks *Cardamine flagellifera* and it is known from several floodplain sites in the park (not just Stone Cliff). According to Harman et al. (2006) *Thalictrum steeleanum* is synonymous with *T. coriaceum*, which occurs at NERI, but which WVDNR does not track as rare.

p. 3-33 -  **Federally Designated Mammal Species** Two mammal species are federally-designated as endangered and one species is federally-designated as a species of special concern. The federally-endangered Indiana bat (*Myotis sodalis*) and the Virginia big-eared bat (*Corynorhinus townsendii*) use abandoned mine portals as roosting sites and cliffs for foraging. The park contains stable, healthy, globally significant populations of Allegheny woodrats (*Neotoma magister*), a federally designated species of special concern that is in decline throughout the rest of its range in the eastern United States (Balcom et al. 1996).

C Allegheny woodrats are probably stable throughout most of West Virginia, not just in NERI. The USFWS eliminated the Species of Special Concern classification.

p. 3-34 - The federally endangered northern flying squirrel (*Glaucomys volans fuscus*), is predicted to occur in the park but never documented (WV Gap Analysis Program 2003).

C WV northern flying squirrel habitat is high elevation red spruce and northern hardwood forests, which do not occur in NERI. The scientific name for West Virginia northern flying squirrel is *Glaucomys sabrinus*, subspecies *fuscus*. There is no such thing as a *Glaucomys volans fuscus*. This subspecies has also been delisted by the USFWS.

p. 3-34 -  **Federally Designated Amphibian Species** The Cheat Mountain salamander (*Plethodon nettingi*), a federally listed threatened species, is predicted to occur in the park (WV GAP 2003). However it has not been documented and the appropriate habitat (boreal forests) is not present in the park.

C WV Cheat Mountain Salamander are restricted to high elevation red spruce forests, which do not occur in NERI. WV red spruce forests on NPS lands are not “boreal.”

p. 3-83, Fishing Overview, Paragraph 1 Line 3

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<sup>5</sup> Harmon, P.J., D. Ford-Werntz, W. Grafton. 2006. Checklist and Atlas of the Vascular Flora of West Virginia. West Virginia Division of Natural Resources, Wildlife Resources Section, Elkins, WV. 318 p.

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- C The brown trout population in lower Glade Creek should not be considered self-sustaining. It is usually stocked on an annual basis with fingerling brown trout and some trout from the put and take section move downstream into the catch and release area. Additionally, natural reproduction has been verified in Buffalo Creek.

p. 3-83, Management Concerns, First bullet point

- C The act of releasing aquatic life is now illegal statewide.

Second bullet point

- C The tributaries to the New River have been stocked with trout for many years, well before the NPS acquired an interest in this area. We contend that fisheries management authority lies with the WVDNR.

Third bullet point

- C NPS cannot attribute all litter at public access sites to anglers. While we agree that some careless fishermen contribute more than their fair share of litter, which we object to as well, the river and all access sites are used by many other users such as kayakers, rafters, picnickers, partiers etc. and, therefore, littering should not be listed only under fishery management.

Fourth bullet

- C We question how much access the public actually needs. It is our belief that the current level of access in this part of the river is adequate and that increasing access often results in overuse and detriment. Also, for any and all future work within the river, the NPS needs to obtain proper State and Federal permits from the WVDNR, WVDEP, and US Corps of Engineers to ensure minimal impact to the environment and to adhere to current permitting standards of these agencies.

p. 4-31- Natural and Scenic Resource Management Activities, Fourth Bullet

- C Only man-made debris should be removed from floodplain areas as natural debris is a natural part of the ecology of these areas.

p. 4-70 - Sixth bullet

- C Only man-made materials should be removed from floodplain areas. Woody debris not only decays and contributes to nutrient cycling, but provides physical

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cover for a wide variety of wildlife from salamanders and snakes to larger mammals like raccoons.

Seventh bullet

- C In order to remove “old bridge piers” from the river, a WV right of entry permit would be necessary and if a causeway was going to be constructed to access the pier(s) with heavy equipment, a 404/401 permit would be required as well. From past experience we have seen more environmental impact created from the removal of structures than the old structures were creating themselves. For this reason, due diligence must be used to separate and assess real aesthetic impact from potential environmental impact. At present, we are unaware of old bridge piers posing a danger to the environment or the public. This comment applies throughout Alternatives 2 through 5.

p. 4-81, Third bullet from top

- C Only man-made materials should be removed from floodplain areas. Woody debris not only decays and contributes to nutrient cycling, but provides physical cover for a wide variety of wildlife from insects, crustaceans, salamanders and snakes to larger mammals like raccoons. This comment applies throughout alternatives 2 through 5.

Tenth and eleventh bullet from top

- C We contend that the fishery in the New River, just like the fishery of the Bluestone National Scenic River, tributaries to the Potomac that flow through the Monongahela National Forest, the Blackwater and Ohio rivers flowing through our two National Wildlife Refuges and all the other fisheries occupying Waters of the State are managed by the WVDNR and that agency will determine what fish species will be stocked or not stocked. This comment applies to Alternatives 2 through 5.

p. 4-248 - Section 4.7.6 Terrestrial Wildlife

- C Given that oak is only sporadically regenerating under current management, we question how the forest-wide oak component will be maintained without active intervention. We believe the statements in this plan are unsupported and are unaware of any successful passive management and maintenance of oak forests. Any supporting documentation should be referenced in this document. Additionally, if the forest is changing to favor more mesophytic plant species, the associated animal species diversity will similarly decline. Impacts on terrestrial

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habitats and dependent species would be significantly beneficial for some species in the long-term and significantly negative for others.

Not mentioned in this document is the number of Neotropical migrant bird species on the PIF watch list which are dependent on early successional habitat, a number far larger than the number of species depending on mature forest. Additionally, species dependent on early successional habitat are declining on a regional and national scale at rates greater than those for the species dependent on mature forest. Examining the forest statistics for West Virginia, there is more mature forest in West Virginia now than there ever has been since forest statistics have been calculated. If one of the goals of the New River Gorge General Management Plan is to have a long-term positive impact on the greatest number of bird species (especially those on the PIF watch list), then greater effort should be expended for creating early successional habitat.

p.4-249 - Public Use, Enjoyment, and Experience Management Actions

- C The construction of a New River access site at Surprise will require the clearing of significant acreage of mature floodplain forest. Earlier in this document, it is mentioned that forest composition is changing to more mesic tree species and the decision to perform no management to maintain and perpetuate current forest conditions is justified by describing the dangers of forest fragmentation. When describing forest fragmentation, there was no mention that fragmentation caused by timber harvesting is a temporary phenomenon, while fragmentation caused by development (like a river access site) is permanent. Animal species composition will change following a timber harvest, yet as that harvested area matures, species composition will gradually revert back to what existed prior to harvest. Forest fragmentation caused by judiciously applied silviculture is not an issue if that particular piece of land is kept as a forest. Development results in permanent species composition change. It seems at best hypocritical to allow the forest composition to change on the rest of the area due to lack of management justified by concerns for forest fragmentation and then propose to clear 90-95 acres of floodplain forest to create a new access site.

**Appendix F p. F-4 - Species of Special Concern in West Virginia Known to Occur in New River Gorge National River Vascular Plants**

*minima* dwarf anemone G5 S1 – *Anemone quinquefolia* var. *minima*  
*Eriogonum allenii* yellow buckwheat G4 S2 –

- C This is a shale barren endemic which is highly unlikely to occur in NERI (no shale barrens).

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*Pinus resinosa* red pine G5 S1 –

C NERI occurrences are planted and are not tracked as rare plant occurrences.

*emersum* water smartweed G5 T5 S2 –

C *Polygonum amphibium* var. *emersum* water smartweed *Sibana virginica* Virginia cress G5 S2? –

C *Sibara*

*Spirea virginiana* Virginia spiraea S1 G2 threatened

C Not known from NERI.

*Trifolium stoloniferum* running buffalo clover S3 G3 endangered

C Not known from NERI.

### **Preferred Alternative Selection**

Selection of a preferred alternative varied amongst my staff. Interestingly, all supported the expanded hunting opportunities afforded within alternative 5 due to their concerns that inadequate deer harvests can impact rare plant communities and impinge upon oak regeneration and inadequate hunter access can exacerbate low harvests and unnecessarily impact hunter recreation and enjoyment of this large tract of publicly owned land. We reject Alternatives 2, 3 and 4 and could support Alternative 1 or 5. Our primary concern with supporting Alternative 5 (NPS preferred alternative) was improved access runs the risk of despoiling areas within the park and seems to conflict with the “remote backcountry” experience the NPS desires to provide. A number of river miles are inaccessible except by water and a great number of people appreciate the experience that provides. Although limited access exists from the CSX railroad grade, the public cannot drive it and the river experience is one of isolation that seemingly won’t exist if this road or another is improved and opened for public vehicular access. This improved access also has the potential to negatively impact the flora and fauna that currently reside along that corridor. Secondly, and perhaps most importantly, significant increases of vehicles and horses through the gorge will facilitate the spread of invasive plants. This concern is so great that we believe invasives should be addressed as a stand alone issue. Provided that a pro-active invasive management plan is developed and it receives adequate funding and priority along the proposed north/south connector, we would concur with the NPS selection of preferred Alternative 5. Without that emphasis however, Alternative 1 with the addition of the enhanced hunting program found in Alternative 5 would be our preference.

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If you have any questions, please feel free to contact me or Keith Krantz of my staff at 304-637-0245, ext. 2034.

Sincerely,

A handwritten signature in black ink, appearing to read "Curtis I. Taylor". The signature is fluid and cursive, with a long horizontal stroke at the end.

Curtis I. Taylor, Chief  
Wildlife Resources Section

CIT/kkj

**(The following letter on this page was submitted by Jason A. Bell.  
It is the form letter submitted largely verbatim by 20 additional commenters.)**

I feel it is critical that the following be addressed in this version of the NERI General Management Plan (GMP):

BASE Jumping - NERI should state that BASE jumping is an appropriate activity (at certain times) within the park in their GMP. Special Use Permits have been issued to BASE jumpers at Bridge Day for decades, clearly indicating that parachuting is not considered "inappropriate". An estimated 22,000+ legal BASE jumps have occurred on NERI property since the mid-1980's. Acknowledgment of BASE jumping as an appropriate activity would also simplify the permit process by negating the need for a director's waiver. From the 2006 NPS Management Policies:

#### 8.2.2.7 Parachuting

Parachuting (or BASE jumping), whether from an aircraft, structure, or natural feature, is generally prohibited by 36 CFR 2.17(a)(3). However, if determined through a park planning process to be an appropriate activity, it may be allowed pursuant to the terms and conditions of a permit.

It is requested that NERI include a provision for permitting certain types of parachute jumps that may occur outside of Bridge Day (legal catwalk BASE jumping, commercials, test jumps, special stunts) without having to consult Washington for a Director's Waiver. Including BASE jumping in the GMP would solve this problem by permitting the NERI Superintendent to approve appropriate parachute jumps.

NERI should also include "Bridge Day BASE Jumping" as part of any NPS stories that are told to park visitors.

BASE jumpers want to work with NERI and the entire NPS to lawfully and safely permit parachuting within the park system on Bridge Day and at other times during the year.

Thank you for the opportunity to provide comments on your GMP. Please don't hesitate to contact me if you have questions, comments, or need assistance with implementation of the above ideas. As a BASE jumper and a park visitor, I have a vested interest in helping to improve the New River Gorge National River.

**Jason A. Bell**  
**Bridgeport, WV 26330**  
[jbell@vertical-visions.com](mailto:jbell@vertical-visions.com)

**OTHER COMMENTS PERTAINING TO BASE JUMPING RECEIVED VIA THE NPS PLANNING, ENVIRONMENT AND PUBLIC COMMENT (PEPC) WEBSITE (not using the preceding form letter):**

**Name:** 36 Withheld by Request

In response to question 2 - Alternative 5 appears to be an excellent approach to managing the park's resources. The facilitation of community groups to assist in the management of Park resources reflects best practice sustainable management.

In response to topic question 3 - the GMP does not make notable mention of an existing use of the park. BASE jumping is a sport that has been accepted as a valid expression of the park's Outstandingly Remarkable Values (i.e. the New River Bridge) in recent years. This sport is booming around the world and participation is only set to increase.

As both a BASE jumper and environmental professional, I am concerned that the omission of this legitimate activity from the management plan leaves considerable risks and opportunities unmanaged.

Take the positive example raised by MOAB for instance - the positive recognition of BASE jumping in Moab, has raised awareness of the sensitivities associated with Cryptogamic soil structures in the region, while at the same time providing a foundation for the management of an activity that brings considerable tourist revenues to the area.

In accordance with one of the Park's three main purposes - existing and future BASE jumping activities 'provide opportunities for public understanding, appreciation, and enjoyment of the park's natural, cultural, scenic, and recreational resources and values' by bringing tourists from all over the USA as well as internationally.

BASE jumping is an existing park activity that should be proactively managed within the GMP.

**Name:** 35 N/A N/A  
**Organization:**  
**Organization Type:** I - Unaffiliated Individual  
**Address:**  
 Lahaina, HI 96761  
 USA

I feel it important to express my thoughts about BASE jumping within the National Parks.

We as BASE jumpers are like every other citizen who use the National Parks every year. We pay taxes, have steady jobs, families, etc.

We are hikers like everyone else in the park, we take pictures, take in the views, pay the fees, and respect the trails. For only 30 seconds we are different. We are hikers like everyone else.

It is sad that for the 30 seconds that we are different we are prosecuted and discriminated against.

Why don't we ban Harley's from the NPS???? They cause more of a noise disturbance in watching and viewing wildlife as well as pollution added to the parks??

I'm sorry but I cannot understand for the life of me why we are disrespected, prosecuted, and discriminated the way we are (BASE jumpers).

Thank you for your time.

**Name:** 47 Withheld by Request

Please open New River Gorge Bridge for year round Fixed Object (BASE) jumping from the catwalk. BASE Jumping has a long history at the NRGB with an excellent safety record. BASE Jumpers are a self-regulating group of safety conscious and environmentally minded outdoorsman, much like any other user of NPS resources, however for 30 years we have been hunted from, rather than welcomed to the National Parks.

As it stands, I regularly spend large amounts of money to travel to Europe, where BASE jumping is allowed freely without any regulation from the large cliffs in Norway, France, Switzerland, Italy & Austria. If the NRGB area were opened for year round jumping, I would make the trip frequently, putting my money into the local economy rather than spending it overseas. The NRGB area sees a huge economic boom from the yearly Bridge Day celebration and the locals desperately want the extra business that year round BASE Jumping would bring to the local economy.

Much thanks,

**Name:** 49 Withheld by Request

I believe my comment best pertains to topic question number 3.

3. Are there any current or future issues important to management of the park which you feel were not adequately addressed?

After reviewing the Draft General Management Plan I was saddened to note that BASE jumping was not identified in writing as an appropriate activity within the park subject to certain time restrictions. This is especially disheartening given that there have been an estimated 22 thousand legal BASE jumps that have occurred in the park since the mid 1980's. Moreover, the experience of seeing jumpers leap from the bridge as part of Bridge Day festivities is arguably the most formative experience of over a million spectators who have been part of that important cultural and economic event.

As a climber, I have been fortunate to be welcomed in the area and during several trips to the park and surrounding areas have made life-long friends in the area that I continue to visit or meet there annually. My exploration of parachute sports happened subsequent to this

introduction and now I have come to feel strongly that parachutists are not given the same ability to enjoy our national park system as are other user groups. The impact of these activities is insignificant in relation to other user groups yet because the technology did not exist to safely pursue these activities until more recently than hiking, climbing, horseback riding, rappelling, cat walk touring, or boating, there is a notable difference in treatment.

Please recognize that BASE jumping is an integral part of many people's experience at your park, that it is practiced safely and responsibly by its participants, and that the small user group who is drawn to the bridge can be a partner in the future.

Thank you. Please feel free to reach out to me with any questions or comments you may have, I'm more than happy to discuss my thoughts with you. And for the record, I have never participated in a BASE jump myself but look forward to jumping a safe object like the New River Gorge Bridge someday.

**Name: 13** Withheld by Request

I have just one general comment to share about the GMP. I would like to see the activity of BASE jumping to be acknowledged as an appropriate activity in New River Gorge. As an avid parachutist, I have attended numerous Bridge Days at the park and enjoyed them very much. Please add BASE jumping as an appropriate activity at the park so we may enjoy our sport without harrasment or unnecessary waivers and permits. Thank you very much, Respectfully, Cpl. Robert S. Morgan, United States Marine Corps

**Name: 16** Withheld by Request

Please consider adding Base jumping to this version of the NERI General Management Plan. I feel it is important to expand the Base jumping scope outside of the Bridge Day limitations. Simply if it were available to jumpers more often many people would visit the area throughout the year and not just one weekend a year. As jumping has been incorporated successfully since the early 1980's, it should be expanded for the future so there are more opportunities throughout the year to enjoy such a wonderful place.

**Name: 19** Withheld by Request

I feel that it is important that BASE jumping should be included in the General Management Plan. BASE jumping is allowed every year from the bridge with special permits, and have been allowed for many years. Now that the catwalk is going to be open to visitors, it seems logical to allow BASE jumping on certain (non bridge day) dates, with special permits. Not only would it bring it a large increase in revenue to the Fayetteville area, but it would also be an exciting event for catwalk tour patrons to watch while on their tour across the river. BASE jumping is a legitimate sport, with many legal objects across the world, including a large bridge in Idaho,

which is legal every day to jump. Being that the New River bridge has had an estimated 22,000 legal jumps off of it, it is hard to have the position that BASE jumping is not an "appropriate activity". Please consider an addition to the general management plan to incorporate legal BASE jumping from the catwalk.

Thank You,

**Name: 21** Withheld by Request

Hello,

I would like to have my sport of BASE jumping addressed in your management plan. I feel the NPS has the wrong idea of our sport. BASE jumping is an established and legitimate sport. We wish to be able to BASE jump in our national parks in a safe and responsible way.

Thank you,

**Keep Private:** No  
**Name: 22** N/A N/A  
**Organization:**  
**Organization Type:** I - Unaffiliated Individual  
**Address:**  
Longmont, CO 80503  
USA

3. I feel the GMP neglected to include BASE jumping as an appropriate activity within the Park. NERI should be allowed to issue permits for BASE jumps occurring outside of Bridge Day. As a Colorado resident, I enjoy jumping at Bridge Day. However, if I were able to procure a permit for BASE jumping, as deemed appropriate by the NERI Superintendent, I would be pleased to perform legal jumps outside of Bridge Day and the community adjacent to the New River Gorge bridge would benefit from my tourist dollars! I dislike having to state it that way, but I think both parties (myself and the local community) would benefit from such a situation and it is worthwhile to consider it. Please include BASE jumping in the GMP and thank you for allowing me an opportunity to comment.

**Name: 27** Withheld by Request

3) I feel that BASE jumping should be included as an appropriate activity within the park in their GMP. BASE jumping is already allowed under the special use permits for bridge day.

**Keep Private:** No  
**Name: 28** N/A N/A  
**Organization:**  
**Organization Type:** I - Unaffiliated Individual  
**Address:**  
 Hanover, NH 03755  
 USA

BASE jumping in National Parks is currently prohibited except by waiver. Perhaps the waivers could be approved at a lower level than Washington, D.C.. I feel that park supervisors should have the authority to approve such activities without having to go to such a high authority level. West Virginia's "Bridge Day" event is an outstanding example of an activity that would benefit from this change. It would save the NPS money and time by streamlining the process and reduce administrative overhead for this event. Thank you for considering my comments.

**Name: 30** Withheld by Request

I feel it is critical that NERI should state that BASE jumping is an appropriate activity within the park in their GMP.

Special Use Permits have been issued to BASE jumpers at Bridge Day for decades, clearly indicating that parachuting is not considered "inappropriate".

An estimated 22,000+ legal BASE jumps have occurred on NERI property since the mid-1980's. Acknowledgment of BASE jumping as an appropriate activity would also simplify the permit process by negating the need for a director's waiver.

As a BASE jumper, myself and thousands of others are constantly traveling around the globe spending out money in international communities to base jump. I would visit the area frequently if the activity of BASE jumping were legal. This has proven to work very well in Idaho (Twin Falls) where BASE jumpers bring a lot of money to the local economy.

Thank you for the opportunity to provide comments on your GMP.

**Name: 33** Withheld by Request

BASE Jumping - NERI should state that BASE jumping is an appropriate activity (at certain times) within the park in their GMP. Special Use Permits have been issued to BASE jumpers at Bridge Day for decades, clearly indicating that parachuting is not considered "inappropriate". An estimated 22,000+ legal BASE jumps have occurred on NERI property since the mid-1980s. Acknowledgment of BASE jumping as an appropriate activity would also simplify the permit process by negating the need for a director's waiver.

It is requested that NERI include a provision for permitting certain types of parachute jumps

that may occur outside of Bridge Day (legal catwalk BASE jumping, commercials, test jumps, special stunts) without having to consult Washington for a Director's Waiver. Including BASE jumping in the GMP would solve this problem by permitting the NERI Superintendent to approve appropriate parachute jumps.

**Name:** 37 Withheld by Request

I believe the NPS should reconsider its current position in regards to BASE Jumping. Base Jumpers have contributed much to the Park System, specifically the New River Gorge. Much like other park visitors, BASE Jumpers have a vested interest in the sustained availability of the National Parks, and nearly every active jumper promotes themselves and their actions in a professional manner. It is time that BASE Jumpers have the privileges that nearly all other outdoor enthusiasts are provided within the National Park System.

**Name:** 40 Withheld by Request

Hello,

I am a base jumper from Michigan. I have spectated and jumped at bridge day in the past and had a great time. About twice a year myself and about 4 others fly out to Idaho to jump the Perrine Bridge (which is legal to jump year round).

If there was year round legal jumping from the new river gorge bridge, we would go there instead not only because it is closer, but as far as bridges go the NRG Bridge is much bigger and much better. I also prefer the scenery in WV.

There are jumpers from abroad that travel all the way to WV to jump at bridge day and they may only get 3 or 4 jumps during the 6 hours the bridge is open for jumping. If the bridge was jumpable year round it would certainly draw a lot more tourists and no doubt bring money into the area.

Thank you,

**Keep Private:** No  
**Name:** 42 Thomas J. Lundergan  
**Organization:** Sky-Frogs  
**Organization Type:** I - Unaffiliated Individual  
**Address:** 919 Blackwood Avenue  
Tallahassee, FL 32303  
USA

I am a citizen, voter, tax payer, college professor, and parachutist who would really appreciate the opportunity to legally use a parachute at more of the beautiful places that are located in of our nation of freedom.

We are the home of the brave yet there are only a few cliffs and bridges that allow BASE jumping in our country (some part time, some year round, examples include Twin Falls, Idaho, Moab, Utah, and the Bride Day event in WV).

I respectfully ask you to please consider allowing temporary permission of BASE jumping at two (2) specific locations as a test run for future use management of our public lands.

1) From the catwalk underneath the New River Gorge Bridge. This beautiful bridge is very tall, has been jumped many times, and tourists to this site bring tax dollars and economic activity with them.

2) El Capitan or Half Dome in Yosemite National Park for just one single "3-day weekend" event per year. Other citizens in our country are allowed to enjoy these uniquely American rock formations in their own special way, example: climbing them. Plenty of jumpers travel to Europe to legally jump from their legal mountains and spend lots of money while they are there. Thank you for your consideration.

Respectfully,  
 ~Tom Lundergan, M.S.  
 Economist & Parachutist

**Keep Private:** No  
**Name: 43** Justin W. Thomas  
**Organization:**  
**Organization Type:** I - Unaffiliated Individual  
**Address:** 222 Glenwood Ave 309  
 Raleigh, NC 27603  
 USA

I am a Senior Software Engineer from NC. I typically fly out to Twin Falls, ID at least once a year for a BASE jumping trip. I typically spend about \$60 per person on average a night for a hotel. I also spend at least \$20 a day on food. I would very much prefer to spend my dollar in WV and would visit a lot more frequently if the bridge was opened year round.

Justin

**Name: 45** Withheld by Request

5. The formal planning and allowance for BASE jumpers in the New River Gorge should have some real impact on the history of this location and should not be continually viewed as a stigma to the National Park System, especially for this location.

I'm an avid National Parks and service lands fan that believes Bridge Day has been a vastly

positive impact on this area. I would like to ask NERI and the NPS to please consider expanding the rules past a waiver to a more open plan. Possibly allowing use via special use permits or even allowing its use without permit would allow more jumpers to experience jumping here and pave the way for continued history and economic prosperity to this area.

Thank you for taking the time to read my comments.

Sincerely,

**Keep Private:** No  
**Name: 48** Whitney N. Garner  
**Organization:**  
**Organization Type:** I - Unaffiliated Individual  
**Address:** 4404 Pickwick Drive  
Raleigh, NC 27613  
USA

I completely support year round BASE jumping at the New River Gorge bridge. This would not only be a great benefit to jumpers in the US but would be a persistent revenue stream for the local economy at no additional cost (all material needs are in place).

**Name: 51** Withheld by Request

3- I think it is important that BASE jumping be addressed in the new plan. Bridge Day has been occurring for over a decade now, showing that BASE jumping is not considered an inappropriate activity in the park.

**Name: 53** Withheld by Request

BASE Jumping should be defined in writing in the Plan to be an appropriate activity. Special Use Permits have been continually issued to BASE jumpers at Bridge Day clearly indicating that parachuting is an appropriate activity. Over 22,000 legal BASE jumps have occurred on NERI property over the past 25 years.

**Name: 54** Withheld by Request

Please consider allowing BASE jumping from the New River Gorge Bridge. I have attended Bridge day since 2006 and look forward to attending every year. I would really enjoy being able to take trips to the New river gorge more often, provided that BASE jumping was permitted year round.

Thank you for your consideration!

**Name: 55** Withheld by Request

Hello, please include BASE jumping and parachuting as an appropriate activity within the park in their GMP. Thank you.

**Keep Private:** No  
**Name: 56** Kevin Collier  
**Organization:** BASE  
**Organization Type:** I - Unaffiliated Individual  
**Address:**  
Hillsdale, NJ 07642  
USA

Let us base jump

**Name: 60** Withheld by Request

If BASE was legal on the New River George Bridge, I would make multiple trips there regularly to jump, and would therefore bring significant amounts of money to the area in the way of groups of jumpers.



## Appendix B

### Other Agency Correspondence Received that Contains Non-Substantive Comments

- Letter Received from the West Virginia Division of Culture and History  
(May 25, 2010)..... B-1
  
- Letter Received from the U.S. Fish and Wildlife Service  
(September 15, 2010) ..... B-3





**The Culture Center**  
1900 Kanawha Blvd., E.  
Charleston, WV 25305-0300

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • www.wvculture.org  
Fax 304.558.2779 • TDD 304.558.3562

EEO/AA Employer

May 25, 2010

Mr. Don Striker  
Superintendent  
National Park Service  
New River Gorge National River  
104 Main Street, PO Box 246  
Glen Jean, WV 25846

RE: Draft General Management Plan (GMP)  
FR# 10-522-FA

Dear Superintendent Striker:

Thank you for providing the West Virginia State Historic Preservation Office (SHPO) a copy of the Draft General Management Plan/Environmental Impact Statement for the New River Gorge National River (GMP.) The GMP is a thoughtful evaluation of future activities and their possible impact to the resources of the New River Gorge National River. The document also reveals consideration of the public who enjoy the river and its natural, cultural and scenic aspects. As you know, the State Historic Preservation Office is a consulting party according to Section 106 of the National Historic Preservation Act of 1966, as amended, in all activities potentially effecting historic resources listed in or eligible to the National Register of Historic Places. Please accept the following comments.

Throughout the New River are located significant resources associated with the history of the industries, transportation and settlement of the region. Our office will continue to work with the National Park Service (NPS) to insure that these resources are protected and preserved. We have no objections at this time to the implementation of the Alternative 5 Concept: Exploration Experiences (Preferred Alternative.)

During our May 12, 2010 meeting with Deborah Darden, Richard Segar and Scott Stonum, several specific items from the text were discussed. These are addressed briefly as follows.

*Traditional Association:* Pages 1-7 and 1-21 of the GMP discuss the people and groups traditionally associated with the lands within the park. On page 1-7, the text states that descendants of the federally recognized Shawnee tribe are associated with the New River Gorge

Page 2

Mr. Don Striker

May 25, 2010

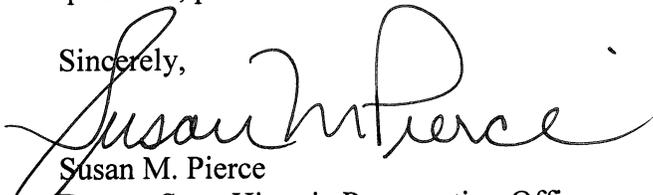
region. However, later in the text on 1-21, it is stated that “there is no documentation of the park resources that traditionally associated people and groups currently use or used historically in the park.” Any future consultation with federally recognized tribes would benefit from further explanation of Native American cultural affiliations to this region. This discussion also revealed that cultural studies currently underway would broaden the understanding of these statements. We request that these studies continue to be shared with our office.

*Partnerships:* The GMP recognizes the importance of partnerships with state agencies. It specifically points out working with Babcock State Park. However, Camp Washington Carver, a site administered by the Division of Culture and History and adjacent to Babcock is not mentioned. The Camp is noted for its construction during the Works Progress Administration and its activities as an African American 4-H camp. Cooperative activities would be beneficial to both our agencies.

*Public Appreciation:* Finally, on page 1-27, there is a typographical error that misleads the reader. “Many park users – from the local area and from the region – *do not* appreciate the NPS mission at the park and *do* understand the mandate that the NPS has to protect the resources and to enforce NPS management policies regarding activities within the park.” (Emphasis added.) These statements are contradictory and Ms. Darden noted that the public actually has difficulty understanding aspects of the NPS mandate.

As you know, the Section 106 consultation process is outlined in a programmatic agreement. As discussed with your staff, we hope to finalize a meeting date for the near future to review the current activities at the park. We look forward to our continued cooperation. If you have any questions, please don't hesitate to contact our office.

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Pierce". The signature is written in black ink and is positioned above the printed name and title.

Susan M. Pierce

Deputy State Historic Preservation Officer



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

West Virginia Field Office  
694 Beverly Pike  
Elkins, West Virginia 26241

September 15, 2010

Mr. Don Striker, Superintendent  
New River Gorge National River  
104 Main Street  
Post Office Box 246  
Glen Jean, West Virginia 25846

Re: Draft General Management Plan and Environmental Impact Statement, New River Gorge National River, Fayette, Raleigh, and Summers counties, West Virginia

Dear Mr. Striker:

The U.S. Fish and Wildlife Service (Service) has reviewed the 2009 Draft General Management Plan and Environmental Impact Statement (GMP/EIS) for the New River Gorge National River (NRG NR) located in Fayette, Raleigh, and Summers counties, West Virginia. You have requested informal consultation on the selection of Alternative 5 from the GMP/EIS as both the National Park Service (NPS) preferred and the environmentally-preferred alternative. These comments are provided pursuant to the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) (ESA).

Two Federally-listed endangered species, the Indiana bat (*Myotis sodalis*) and the Virginia big-eared bat (*Corynorhinus townsendii virginianus*), are known to occur within the boundary of the NRG NR. This area also supports the peregrine falcon (*Falco peregrinus*), a migratory bird species that was previously Federally-listed but has been delisted due to recovery, as well as a number of other state and globally-rare species, and species of concern. The GMP/EIS outlines a number of measures that the NPS proposes to implement to benefit Federally-listed endangered species and other Service trust resources. Examples include the protection and enhancement of riparian zone vegetation, and reduction of human disturbance levels near sensitive species habitat. The Service supports the inclusion of these beneficial conservation measures. In addition, the GMP/EIS states that the NPS will consult with the Service before implementing any project-specific management actions that have the potential to affect Federally-listed species, and as appropriate, will conduct surveys and/or implement conservation and avoidance measures to ensure that future actions are not likely to adversely affect listed species.

Mr. Don Striker, Superintendent

September 15, 2010

The Service concludes that implementation of these programmatic measures as outlined in the GMP/EIS for Alternative 5 may affect, but are not likely to adversely affect any Federally-listed endangered or threatened species. This determination may be reconsidered if: 1) proposed project plans change; or 2) amendments to the GMP/EIS are proposed; or 3) additional information on listed species becomes available that alters the level of potential effects to these species; or 4) new information on candidate species becomes available. The Service will continue to work cooperatively with the NPS on consultations regarding future project-level actions.

Also, for the Final GMP/EIS please note that the West Virginia northern flying squirrel (*Glaucomys sabrinus fuscus*) has been delisted due to recovery. The NRGNR is outside of the known range of this species. Additionally, Steele's meadow rue (*Thalictrum steeleanum*) and bittercress (*Cardamine clematidis*) should not be referred to as currently under consideration for Federal listing.

If you have any questions regarding this letter, please contact Barbara Douglas of my staff, at (304) 636-6586, Ext. 19, or at the letterhead address.

Sincerely,



Deborah Carter  
Field Supervisor

As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

Printed on recycled paper.





New River Gorge National River  
National Park Service  
2011