

**National Park Service
U.S. Department of the Interior**

**Blue Ridge Parkway
North Carolina**



MOSES H. CONE MEMORIAL PARK DEVELOPED AREA MANAGEMENT PLAN

**Finding of No Significant Impact
July 2015**

The selected alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). The selected alternative will not have a significant effect on the human environment. Some long-term adverse environmental impacts will likely occur, but these will be limited in extent and partially offset by management activities designed to minimize impacts. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects or elements of precedent were identified. Implementation of the selected alternative will not violate any Federal, State or local environmental protection laws.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended: *Monik May*
Acting Superintendent, Blue Ridge Parkway

7-28-15
Date

Approved: *Star Cusick*
Regional Director, Southeast Regional Office

7/28/15
Date

INTRODUCTION

The National Park Service (NPS) has prepared an Environmental Assessment (EA) that evaluates the proposed management of the Moses H. Cone Memorial Park along the Blue Ridge Parkway (Parkway). This project will provide a long-term management strategy that will best protect and preserve the extraordinary resources at the site while providing for an enjoyable visitor experience.

After Moses Cone's death in 1908, his wife Bertha assumed ownership of the Moses Cone estate. To ensure the perpetual maintenance of the estate and its opening to the public after her death, Bertha Cone deeded the property to the Moses H. Cone Memorial Hospital in 1911, giving it the name "Moses H. Cone Memorial Park." She retained the right to live at and manage the estate for the remainder of her life.

Following Bertha Cone's death in 1947, the trustees of the hospital agreed that the Blue Ridge Parkway (Parkway) would be better able to manage the estate. A deed filed for registration on January 11, 1950 transferred the Moses H. Cone Memorial Park from the Moses H. Cone Memorial Hospital to the United States of America. Under the terms of the indenture, the National Park Service assumed the obligations of the 1911 settlement and agreed to maintain a system of roads on the estate equal in extent to the system then in operation, and to develop the park in accordance with an agreed master plan, which has never been completed. This planning effort remedies that deficiency and creates a master plan for the Moses H. Cone Memorial park in compliance with the terms of indenture in the deed.

By 1952 the NPS had developed a set of general development and master plan drawings to document where roads, parking areas and utilities were to be constructed. In order to accommodate visitors, the National Park Service developed an access road from the Parkway to a new parking lot behind the Flat Top Manor House, and removed many of the buildings and structures that had formerly supported agricultural uses. Park housing and a maintenance area were constructed. Much later a road to Bass Lake and parking area were constructed and then a comfort station.

Current NPS management planning takes a more comprehensive approach that looks beyond general development to resource and visitor use management. The Parkway's recently completed (2012) General Management Plan (GMP) provides overall Parkway-wide guidance and zoning which creates a long-term vision for how Parkway resources would be managed. This Developed Area Management Plan (DAMP) tiers from the GMP to apply those Parkway-wide concepts and provide management direction at this particular site. An up-to-date management plan is needed to:

- Clearly define resource conditions and visitor experiences to be achieved at the Moses H. Cone Memorial Park.
- Provide a framework for National Park Service managers to use when making decisions about how to best protect Memorial Park resources, how to provide an appropriate range of visitor experience opportunities, how to manage visitor use, and what kinds of facilities, if any, to develop.
- Ensure that this foundation for decision making has been developed in consultation with interested stakeholders and adopted by NPS leadership after an adequate analysis of the benefits, impacts, and economic costs of alternative courses of action.

The NPS has prepared an EA to look at alternatives for management in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code 4321 et seq.), the Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations 1500 through 1508) for implementing NEPA, and the NPS NEPA compliance guidance handbook (Director's Order (DO)-12, *Conservation Planning, Environmental Impact Analysis, and Decision-making*). The EA was released on January 5, 2015, for a 36-day agency review and public comment period.

PREFERRED / SELECTED ALTERNATIVE

Concept

The NPS has selected Alternative One (Enhance What We Have), the NPS Preferred Alternative. The decision to select the preferred alternative is based on NPS analysis of the beneficial and adverse impacts of all alternatives. The results of this analysis, found in chapter 4 of the EA, demonstrate that the Preferred Alternative has the greatest beneficial effect across a range of parkway resources and values, including: natural and cultural resources, visual resources, visitor use and experience, and socioeconomics. The decision is also based on approximately 596 comments on the draft plan that were received from individuals, organizations, and agencies. No significant concerns were raised that could not be addressed by minor modifications to the plan. Most of these comments offered suggestions on ways to improve or strengthen the NPS Preferred Alternative. The alternative elements that were not originally in the Preferred Alternative were assessed within the EA and adding them to the Preferred Alternative did not change the results of the impact analysis. Where appropriate, recommended changes were made to the Preferred Alternative to provide more clarity, expand on proposed management strategies, or provide factual corrections, and are reflected below.

The Preferred Alternative meets the enabling legislative requirements to preserve, conserve, and protect natural and cultural resources while providing for public enjoyment. Also, the selected alternative best balances the need of the National Park Service to provide high-quality visitor experience and protect resources. The selected alternative also addresses public comments and concerns received, as summarized in the section entitled, "Public Involvement" in this record of decision.

Under this alternative, the Parkway will take a comprehensive approach for resource and visitor use management. Specific management zones detailing acceptable resource conditions, visitor experience and use levels, and appropriate activities and development will be applied. Instead of the Memorial Park being managed as a "Learning Center" and focusing on the *extended* Cone Family, this alternative incorporates actions which will focus on the estate's period of significance from 1899 to 1947 and it concentrates on the Cone family and their Country Place Era estate and their life there. A much expanded interpretive and visitor use program will focus the public's understanding and recognition on the historic importance of the Cone estate with its historic structures and designed landscapes.

The primary change in the Memorial Park's infrastructure will be in the expansion of the current parking area behind the Flat Top Manor House. Educational programs, personal services and visitor activities will be supported by adaptively using existing structures rather than constructing new facilities.

Instead of just maintaining only the most intact parts of the historic landscape at current levels this alternative now allows for rehabilitation of portions of the Memorial Park to include preservation of extant resources, rehabilitation of the cultural landscape, and interpretation of the cultural landscape, buildings and features found on the estate from 1899 to 1947. Building and grounds rehabilitation and future construction will be made based upon interpretive and educational needs.

Flexible use of historic structures and cultural landscapes will be encouraged to facilitate increased educational and interpretive services and traditional recreation uses for visitors. Natural resources will be managed to allow natural succession to continue on areas that have gone unattended. Sensitive natural areas will be managed in accordance with NPS policies.

Primary visitor services will continue at the Flat Top Manor House. Structures' interior spaces might be modified to accommodate interpretive exhibits that facilitate visitors overall understanding of the Cone family, the estate and their influence beyond the boundaries of the park. A business opportunity will continue in the lower floor of the Flat Top Manor House to provide a sales area. Park education programs will be conducted both on and off-site with a strong focus on web-based outreach to a global audience.

Bouldering will continue at China Orchard area and a new horse trailer parking area will be created adjacent to the Blowing Rock Charity Horse Show grounds accessed by Laurel Lane and US 221.

Full implementation of this alternative will require some additional capital investment and operations increases that are not programmed at this time. Funding this alternative will also require some private/public partnerships through donations, grants, in-kind services, volunteers, etc.

Cultural Resource Emphasis

Moses H. Cone Memorial Park will be protected and maintained as a National Register Historic District containing one of the finest Country Place era landscapes in the National Park System. An emphasis will be placed on the rehabilitation and interpretation of the cultural landscape and features of the estate (1899-1947) where feasible. This might result in rehabilitation of the Memorial Park to include not only preservation of extant resources, but also rehabilitation of the cultural landscape, and interpretation of the cultural landscape, buildings and features found on the estate from 1899 to 1947.

Flexible use of historic structures and cultural landscapes will be encouraged to facilitate increased educational and interpretive services and traditional recreation uses for visitors. Research and investigation into the physical history of the property will be continued to help fill gaps in understanding and knowledge of the Cone period in support of appropriate resource management.

The shrub plantings established by the Cones, including rhododendrons, mountain laurels, and Pee Gee hydrangeas will be identified and a maintenance plan developed. Limits of the areas to be maintained will be determined to prevent further expansion.

Natural Resource Emphasis

The woodlands that have been released to natural succession since 1947 will continue to be managed in that manner. Sensitive natural areas will be managed in accordance with NPS policies. Natural resource values will be balanced with protection and maintenance of the extant cultural landscape features known to have been established by Moses and Bertha Cone.

Visitor Experience Emphasis

One objective of the interpretive program will be to interpret the historic character of the Memorial Park to enable the public to understand its significance. Maintained visitor access to and within the Memorial Park will be limited to existing roads, paths, and road trails. Primary visitor services and programs will continue at the Flat Top Manor House. Historic structures' interior spaces might be modified to accommodate interpretive exhibits to facilitate visitors overall understanding of the Cone family, the estate, as well as the Southern textile industry and Moses Cone's role in denim manufacturing. Park

education programs will be conducted both on and off-site with a strong focus on web-based outreach to a global audience.

Visitors might experience the historic period of the Cone Estate through rehabilitation of landscapes and structures. The rehabilitated historic setting could provide an illustrative backdrop within which additional information will be provided about the Country Place Era. The designed landscape features established by Moses and Bertha Cone and their efforts to use innovative and progressive technologies, scientific agricultural practices, landscape design, community interface, and philanthropy will be interpreted through pamphlets, wayside exhibits and personnel service programs. Special events will be managed according to NPS policy for all areas of the park. Educational programs, personal services and visitor activities will be supported by adaptively using existing historic structures rather than constructing a visitor center.

Bouldering and hiking recreation will continue at China Orchard. Traditional visitor uses of the carriage road trails will continue. A new horse trailer parking area will be created adjacent to the Blowing Rock Charity Horse Show grounds accessed by Laurel Lane and US 221.

OTHER ALTERNATIVES CONSIDERED

The EA prepared for this project analyzed the NPS Preferred Alternative described above, a No-Action Alternative, and one other action alternative.

No Action Alternative

Under the No-Action Alternative, no further action would be necessary. Under this alternative, the Parkway would continue to manage the Memorial Park as it is currently being managed, but there would not be a comprehensive park-wide resource and visitor use management direction for setting priorities. Resource and visitor use issues and conflicts would continue to be resolved on a case-by-case basis without the guidance of an agreed upon park-wide management strategy.

The Flat Top Manor House would continue to be managed primarily as a craft and book sales shop and the Memorial Park as a recreational area. Managers would continue to adjust daily management practices to respond to current laws and policies, natural and cultural resource management mandates, visitor safety needs, infrastructure deficiencies, fiscal constraints, and changes in visitor use patterns and characteristics.

The extant features of the Memorial Park--the Flat Top Manor House, carriage house, apple barn, carriage trails and Bass and Trout Lakes would continue to be the focus for NPS management and the backdrop for the visitor's use and experience. Visitors would continue to receive current levels of ranger led programs with some potential additions of interpretive wayside exhibits along trails and at Memorial Park buildings. Little would be changed in the current levels of park operations and visitor use support as long as current funding level is maintained and adjusted for inflation.

Both cultural and natural resource management activities would continue to be directed to treat some of the Memorial Park areas as historic/cultural landscapes while other areas would be conserved in their now more natural condition. Existing natural and cultural resources would be managed in accordance with NPS policies while perpetuating traditional recreational uses. The agricultural lease program would continue to be the preferred way in which pastures and the meadows are maintained.

The approximately 24 miles of carriage roads, now managed as trails, would continue to be a primary focus of recreation activities on the estate. No new uses would be allowed. The Flat Top Manor House, carriage roads, Bass and Trout Lakes, and the Flat Top Mountain destinations of the Cone Cemetery and an observation tower comprise the current overall NPS provided visitor experience.

Bouldering would continue at China Orchard area and a new horse trailer parking area would be created adjacent to the Blowing Rock Charity Horse Show grounds accessed by Laurel Lane and US 221.

Alternative Two (Cultural Landscape Rehabilitation)

Alternative Two would also provide a park-wide and comprehensive approach for resource and visitor use management. Specific management zones detailing acceptable resource conditions, visitor experience and use levels and appropriate activities and development would be applied park-wide.

Alternative Two's focus would be on the estate's period of significance from 1899 to 1947 and would concentrate on the Cones and their Country Place Era estate and their life there. A much expanded interpretive and visitor use program would focus the public's understanding and recognition of the historic importance of the Cone estate with its historic structures and designed landscapes. A combination of adaptive use and new construction would be used to provide the necessary infrastructure and facilities to support this concept. This would result in rehabilitation of the Memorial Park to include preservation of extant resources, rehabilitation of the cultural landscape, and interpretation of the cultural landscape, buildings and features found on the estate from 1899 to 1947.

Educational programs, personal services and visitor activities would be supported by utilizing the Flat Top Manor House as a visitor center. No craft concessioner space would be provided in the Flat Top Manor House or on the estate. Special events would be managed according to NPS policy for all areas of the Memorial Park. Building and grounds rehabilitation and construction would be made based upon interpretive and educational needs; special events might be considered in facilities or rehabilitated grounds, however, these must be in accordance with NPS policy. Recreation would focus on the traditional recreational uses envisioned by the Cones; the exceptions being the allowance of bouldering at China Orchard and public fishing at Bass Lake. A new horse trailer parking area would be created adjacent to the Blowing Rock Charity Horse Show grounds accessed by Laurel Lane and US 221.

Full implementation of this alternative would require significant additional capital investment and operations increases that are not programmed at this time. Funding this alternative would require substantial funding and volunteer involvement of private and academic sector partnerships including funding donations, grants, in-kind services, volunteers, etc.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria suggested in NEPA, which is guided by the CEQ. The CEQ provides direction that "the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA (Section 101(b))." The six NEPA goal statements include:

- (1) Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- (2) Assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;

- (3) Attain the widest range of beneficial uses of the environment without degradation, risk to health and safety, or other undesirable and unintended consequences;
- (4) Preserve important historic, cultural, and natural aspects of our national heritage, and maintain wherever possible, an environment which supports diversity and variety of individual choice;
- (5) Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
- (6) Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Following environmental analysis, the environmentally preferred alternative is the alternative that causes the least damage to the biological and physical environment or that best protects and enhances the natural, historic, and cultural resources of the site. As evaluated against the CEQ regulations, Alternative One (Enhance What We Have) is the Environmentally Preferred Alternative.

The No Action Alternative and Alternative One both offer benefits in the areas of conservation, restoration, and interpretation and therefore, these alternatives are consistent with fulfilling the criteria listed under Section 101 of NEPA. The No Action Alternative would have little effect on the biological and physical environment but would have an adverse effect on cultural resources. This alternative would not uphold the NPS mandate to preserve the historic, cultural, and natural aspects of the Park in a manner that leaves these resources unimpaired, while maintaining safe visitor use standards.

It has been determined that Alternative Two would have little effect on the biological and physical environment but would have an adverse effect on concessions and commercial services. The removal of all concessions in the Flat Top Manor House or on the estate could also have potential impacts to local and regional economy and businesses. In addition, full implementation of this alternative would require significant additional capital investment and operations increases that are not programmed at this time.

The Environmentally Preferred Alternative is Alternative One because it surpasses the No Action Alternative and Alternative Two in realizing the full range of national environmental policy goals as stated in §101 of NEPA. A park-wide and comprehensive approach for resource and visitor use management would provide visitors with an in-depth interpretive experience; reduce or eliminate vehicle congestion and subsequent accidents by expanding parking in the area behind the Flat Top Manor House; and provide clear management strategies for maintaining the overall integrity of the cultural landscape and resources. In conclusion, Alternative One provides the highest level of protection of natural and cultural resources while providing for a safe visitor experience.

MITIGATION

For the Preferred Alternative, best management practices and mitigation measures will be used to prevent or minimize potential adverse effects associated with this DAMP. These practices and measures will be incorporated to reduce the magnitude of impacts and ensure that major adverse impacts would not occur. Mitigation measures undertaken during project implementation will include, but will not be limited to, the following:

Natural Resources

Soils

- Existing trails, subject to compaction, erosion and muddiness will be properly maintained by volunteer groups under Memorandum of Agreement according to NPS standards. If trails are not

properly managed and maintained by volunteer groups to NPS standards, the NPS might consider closing and eliminating segments of trails. Existing trails might be relocated or surfaced if soil movement and compaction cannot be maintained to NPS standards.

- If compaction expands at China Orchard trails and bouldering sites beyond acceptable limits, sections might be closed until the soil character can be restored or rejuvenated or the trails might be rerouted to more appropriate locations.
- Carriage trail ditch lines and culverts will be routinely maintained to adequately carry standing water from heavy rains away.
- Projects that include soil disturbance (construction of visitor parking areas and new comfort stations, new trails) will abide by BLRI “*General Erosion and Sediment Control Standards*” for management of erosion and sediment. Agricultural parcels will be managed to park standards for vegetation cover.
- Contaminated soils already identified or newly discovered will be managed according to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) guidelines.
- Gravel that is not easily washed away, yet meets historic standards, will be used on carriage trails.

Water Resources, including Wetlands

- During construction of any new facilities and trails in and around the streams, erosion control measures will be installed to prevent sedimentation into water resources.
- Any increases in impervious surfaces will be minimized to reduce stormwater activities.
- If management of pasture lands, either within the park or from adjacent lands, increases contamination in nearby waters, best management practices will be implemented to resolve.
- If management of carriage trails and horse use results in unacceptable levels of fecal contamination in nearby waters, best management practices will be implemented to resolve this problem.
- Dredging activities that occur within Bass Lake will retain historic levels of lily pads, which are part of the cultural landscape, as well as supporting fish habitat.
- Wetlands will be managed according to NPS policy.

Vegetation

- Rare plants that might be adversely affected by the reestablishment of views, tree removal or other activities might be relocated through seed collection or direct transplant, whichever is determined to be the most successful, and monitored for success.
- Disposal of trees that are felled will follow standards established in Superintendents Order #6 – Solid Waste Disposal or might be used for firewood in campgrounds.
- Reestablishment of apple orchards will be for education and representation and will not be managed for high-volume production that might require restricted use chemicals.
- All new vegetation planted on the estate will be chosen with genetics in mind; where possible all replacement materials will be as close genetically as possible to current stock and might include transplanting local trees from nearby woods; decisions concerning genetics will be made by the park’s resource management staff.
- A number of tools will be used to manage accumulating woody debris (dropped limbs, fallen trees, leaves) to minimize potential for wildfire hazards to the estate and neighbors.
- Lily pads in Bass Lake will be managed when they exceed historic levels, based on fund availability to research these levels and remove. This can include lowering the lake, use of herbicides, and other mechanical methods.

- Cultural and natural resource treatment and maintenance methods will be instituted that are environmentally and culturally sensitive and sustainable over the long term.
- Areas of ground disturbance, earth grading and compaction, and drainage pattern alteration will be minimized.

Wildlife, Including Neotropical Migratory Birds

- Wherever possible throughout the estate, hazardous downed and dying trees will be felled and left adjacent to the trail unless an extenuating circumstance is present. This action will benefit small mammal, amphibians and reptiles. Extenuating circumstances can include but will not be limited to, aesthetic concerns, increased fire fuels loading, or use of the tree by priority species of wildlife. This decision will be made by NPS personnel.
- To protect migratory bird nesting, park staff will cut hazardous trees between August 1 and April 15. If trees need to be cut outside this timeframe, the resource management staff will be consulted. Prior to removal of hazardous trees at other times of the year park employees will inspect the trees to ensure that there is no active nest.
- Wherever possible, snags will be retained to protect Yellow-bellied Sapsucker habitat.
- Bass Lake lowering and dredging will be timed around migrant waterfowl use (October/November and March/April), if possible.
- Though not a current issue, deer populations might need to be managed using prevailing best management practices to prevent over-browsing and eating of historic vegetation or rare plants.
- To protect the federally listed northern long-eared bat (NLEB), park staff will cut trees outside of the period when young bats are unable to fly (June and July).
- Beaver will be managed to best address historic resources while protecting the beaver.

Cultural Resources

Mitigation measures for the selected alternative include, but may not be limited to, the following:

Archeological Resources

- All new construction and ground-disturbing activities, including the grubbing of tree root balls, will require an evaluation to determine if Phase 1 survey of archeological resources is needed prior to disturbance/construction.
- If previously unknown archeological resources are discovered during rerouting or rehabilitation of trails or other minor excavation work, the area shall be closed and use halted until the resources are identified, documented, and an appropriate mitigation strategy developed.

Cultural Landscapes

- All work will be carried out in accordance with pertinent laws and regulations, including the stipulations of the 2008 Programmatic Agreement among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, and meet the Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes.
- All work will be documented so that there are no questions about what steps were taken. Sufficient study and recordation of landscape features that require modification, repair, or replacement will be undertaken before work is performed, to protect research and interpretive values.
- All work will be carried out in compliance with the amended Cultural Landscape Report for this site dated 2013.

- Park staff will develop a plan of action to maintain maple trees that line Bass Lake in perpetuity (e.g., seeds might be reared in greenhouse; several new trees might be planted each year, etc.).
- Where feasible, structures whose materials have been compromised will be returned to near-historic status (e.g., the current observation tower is metal; if possible, it will be returned to chestnut or other natural material that is more closely related to its original fabric).
- Where feasible, historic gardens will use historic varieties and germplasm as close to the original as possible.
- Additions of roadways and pathways will generally be designed to blend with the character of the historic landscape in the use of color and material, but clearly represent a contemporary addition. For paths, surface materials that are of a warm-hued color are better suited to historic landscapes. Materials to consider will include crushed brownstone aggregate screenings, or colorized asphalt or concrete for the surfacing of new walks and paths. The design of new additions will also feature the smallest footprint possible to accommodate anticipated uses, and will blend seamlessly with the adjacent landform and topography.
- Additions or alterations to the landscape will be designed and situated in such a way that they do not destroy the historic materials, features, and spatial relationships that characterize the cultural landscape. The new additions and alterations to the landscape will be designed and situated in such a way that, if removed in the future, the essential form and integrity of the landscape will be unimpaired.
- The introduction of new buildings and structures will be located to facilitate access and interpretation while minimizing adverse impacts on the historic character and features of the landscape.
- New construction will be compatible with existing historic resources in materials, size, scale and proportion, and massing. Work will be differentiated from existing resources.
- Muted, neutral, earth-tone colors and materials that serve to make new facilities compatible with the historic and natural context will be used for new construction.
- The location, design, and construction of new facilities and systems will be subordinate to the surviving cultural and natural landscape. New design and construction will be as visually unobtrusive as possible without sacrificing functionality.
- Siting new buildings and structures in any of the primary viewshed areas will be minimized.

Ethnographic Resources

- Cone heirs and the Cone Hospital System in Greensboro will be kept apprised of proposed modifications to this plan and to activities on site.

Historic Structures

- All work will be carried out in accordance with pertinent laws and regulations, including the stipulations of the 2008 Programmatic Agreement among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers and meet the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing of Historic Buildings.
- All work will be carried out in compliance with the Historic Structures Report for this site dated 1996.
- Conjectural reconstruction of missing historic buildings and structures will be avoided.
- Bats in buildings and other structural pests will be managed using Integrated Pest Management (IPM) and best management practices for historic structures.

Museum Collections

- All work will be carried out in accordance with DO-24, *Museums Collection Management*, Museum Handbook.
- Museum objects will not be used by employees or the public; they will be for display or research purposes only.

Human Remains and Burials

- Dead and dying vegetation around the Cone cemetery will be replaced with similar materials, according to NPS standards.
- The cemetery where the Cones are buried will be maintained to the highest standards.
- If either pre-historic or historic human remains would be located on the estate, NAGPRA and other regulations will be followed.

Visitor Use and Experience, Including Recreational and Visual Resources

Mitigation measures for the selected alternative include, but may not be limited to, the following:

- Efforts will be made to minimize conflict between different user groups through education and monitoring. If visitor use and experience were adversely impacted by the implementation of the plan, adaptive management strategies will be used to identify appropriate solutions and address those impacts. Strategies might include monitoring, closures, educational efforts, or other measures deemed appropriate to reduce impacts.
- Where feasible, overhead power lines and utility lines will be placed underground.
- The visual impact of circulation systems will be minimized by using techniques such as establishing vegetative screens, evaluating the potential for any new roadways, parking areas and trails to be screened from key viewpoints, and minimizing the amount of signage, seating, and other small-scale features associated with these access systems in their design.
- An implementation plan for site furnishings will be developed that identifies the style and products appropriate for use within the park, distinguishing between design styles that are appropriate for historic areas versus those that are to be used within later developed areas. Site furnishings that are compatible with the character of the park in concept and materials and that are uniform throughout the park will be used.
- The number of contemporary small-scale features will be kept to the minimum required for visitor and staff comfort and safety.
- Interpretive information will be conveyed to visitors primarily through pamphlets and other materials that limit the establishment of new features within the landscape.
- An alternative means for interpretation, such as a visitor center exhibit will be provided to interpret those important features located in areas that could not be made universally accessible.
- Special Park Uses will be managed to minimize the interference with visitor activities.

Human Health and Safety

Mitigation measures for the selected alternative include, but may not be limited to, the following:

- Pesticide applications, if approved, will follow NPS Pesticide Use policies and procedures.
- Arsenic contamination of surface and subsurface soils in and around the orchards and in fish at Bass Lake has been detected by Parkway contractors. Levels are such that minimal contact will not result in harm to human health or safety; however, ground disturbance in those areas should be avoided. Signs will be posted in contaminated areas warning staff and visitors of precautions and relevant information. Staff will be trained in appropriate safety procedures for exposure and

handling any contaminated materials or working in areas of contamination. Use restrictions are being developed to protect visitors and employees from contaminated soils in and adjoining the historic orchards, however, existing uses such as walking, hiking and apple picking pose no discernible threat to visitors or employees. There are also existing warnings against ingesting fish caught in Bass and Trout Lakes due to lead contamination; additional guidance on fish consumption related to arsenic contamination are forthcoming.

- If visitor or employee safety were adversely impacted by the implementation of the plan, adaptive management strategies will be used to identify appropriate solutions to address those impacts.
- Regulations stipulated in the Uniform Federal Accessibility Standard (UFAS) and Americans with Disabilities Act Accessibility Guidelines (ADAAG) will be followed for trails and paths when establishing universally accessible circulation. Steep slopes will be avoided, trail widths will meet regulations, and other precautions will be taken.

Park Operations

Mitigation measures for the selected alternative include, but may not be limited to, the following:

- Organized, coordinated trail maintenance and construction will be undertaken through agreement with local trail organizations. This shared maintenance agreement will cut down on maintenance costs and operational costs associated with keeping the trails in satisfactory condition.
- Sources of funding for many new projects will be identified beyond the park base operating funds. Partnerships and donated funds will be identified to assist in completion of these projects and offset impacts to park operations.
- New construction will be designed taking into consideration BMPs established for the park. In particular, new construction design using green building techniques will be used and technologies such as those described by LEED (Leadership in Energy and Environmental Design), a voluntary, consensus-based national standard for developing sustainable building, will be incorporated.
- Life-cycle costing taking into consideration different kinds of materials to assess their long-term wearing and maintenance costs will be taken into consideration. Materials that are non-toxic, durable, long-lived, and low maintenance will be considered.
- Proposals to restore or reconstruct missing features will be carefully considered. Prior to undertaking restoration or reconstruction efforts, the financial costs of both the initial effort, as well as the subsequent maintenance costs, the accuracy with which the feature could be reestablished, and the ultimate benefit to be gained from interpretation will be evaluated.

Solid Waste Materials

- During construction activities, the generation of waste will be minimized, applicable materials recycled, and recycled products and materials used where suitable. Any waste generated that cannot be beneficially reused or recycled will be disposed of at an approved solid waste management facility.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined by 40 CFR 1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse and which on balance may be beneficial, but that may still have significant adverse impacts, which require analysis in an Environmental Impact Statement (EIS).

No major adverse or beneficial impacts were identified that will require analysis in an EIS. Resource topics that were addressed in the EA were soils, water resources, including wetlands, vegetation, wildlife, including neotropical migratory birds, historic structures, cultural landscapes, archeological resources, ethnographic resources, museum collections, human remains and burials, socioeconomics, visitor use and experience, including recreational and visual resources, human health and safety, park operations, concession and commercial services, and transportation. All other resource topics were dismissed from further evaluation in the document because the associated impacts will be negligible or less. Definitions for the thresholds below can be found in Chapter 4 of the EA.

The Preferred Alternative will have negligible, short- and long-term, localized, direct beneficial impacts on soils proposed for revegetation, and negligible, localized, direct adverse impacts on soils for the remaining disturbed lands. There will be minor, short-term, direct adverse impacts on soils from a new parking area for the Manor House. The dredging of Bass Lake will result in moderate long-term, beneficial impacts to water resources, from the reduction in sedimentation. There will be minor, short-term, adverse impacts from any construction activities for remaining water resources. There will be negligible, short- and long-term, localized and regional, beneficial impacts on vegetation, from the restoration of orchards, conifer plantations, and expanding the edges of agricultural fields at the manor house. Clearing of vegetation to restore and maintain historic views and planting native species will have negligible, long-term beneficial and adverse impacts as evasive species and second-growth forests will be removed and native species replanted. There will be negligible to minor, long-term, beneficial or adverse impacts to wildlife, depending on the species, in the area between the Manor and Bass Lake, from the removal of trees to restore the view. Removal of the vegetation will provide nesting habitat and forage food for several species of birds and mammals, while removing habit for others. Direct impacts on archeological resources from the Preferred Alternative will be minimal as archeological sites will be avoided. The archeological survey of the Manor House property will have moderate to major, long-term, beneficial, impacts since the location of these remains will be known and park staff can monitor the conditions of these resources. Minor, long-term, beneficial impacts on the cultural landscape will occur from preserving the scenic quality and cultural landscape. There will be minor to moderate, long-term, beneficial impacts on ethnographic resources on NPS owned lands as activities would be sited to avoid identified ethnographic resources, and Cone heirs and Cone Hospital System will be kept apprised of activities. Minor to moderate, long-term, beneficial impacts on historic structures will occur from implementation of user-capacity strategies and reducing space of the craft outlet/book store. For NPS owned museum collections, there will be moderate, long-term beneficial impacts as the Manor House interpretive exhibit will be used to place original or reproduction artifacts, allowing expansion of the collection. Minor to moderate, long-term, beneficial impacts to human remains and burials will occur as the Cone cemetery will continue to be maintained in good condition. Minor to moderate, short-and long-term, direct and indirect beneficial impacts on the socioeconomic environment will occur from employment opportunities for concessions and commercial use authorizations, local businesses, and expenditures from workers/visitors on the local and regional economy. Impacts on recreational/visual resources will be moderate, long-term, direct and beneficial due to an increase in scenic quality of vistas, as well as increased interpretive and recreational activities, and negligible, short- to long-term, adverse

impacts if views are not maintained. Human health and safety will have negligible, long-term, beneficial, direct impacts due to HVAC or fire suppression improvements, and minor, short-term, adverse impacts to employees, contractors, and visitors during construction activities. There will be moderate, short- and long-term, adverse impacts to park operations from restoration of views and expansion of the parking lot, and minor to major, short- to long-term, cumulative, beneficial impacts to park operations from partnerships and donations. Transportation impacts will be negligible, long-term, and beneficial from expanding the Manor House parking, and there will be negligible, direct and indirect, adverse impacts to local transportation systems from increased visitation. Impacts on concessions and commercial services will be negligible to moderate, short- to long-term, direct and indirect, and adverse from less sales and storage space within the manor house for the concessioner to use, and moderate, short- to long-term, direct and indirect, beneficial impacts as concessions and commercial services will continue to be permitted.

Degree of effect on public health and safety.

The NPS selected alternative will have a beneficial impact on overall public health and safety as a fire suppression system and HVAC system will be installed in the Flat Top Manor House.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

As discussed in the EA, there are no prime farmlands, wild and scenic areas, or ecologically critical areas that will be affected by implementation of the Preferred Alternative.

As the EA states, there is a small wetland at Bass Lake which might be impacted by dredging activities. These findings were confirmed in a response letter from the North Carolina Wildlife Resource Commission (NCWRC) dated February 2, 2015. Mitigation measures to ensure protection of this habitat was also provided by the NCWRC in this letter, and have been incorporated in the proposed project.

As described in the EA, the Moses H. Cone Memorial Park is a designed historic landscape representative of the Country Place era administered by the park. Furthermore, the Memorial Park is listed as a historic district in the National Register of Historic Places. Under the Preferred Alternative, rehabilitation of portions of the Memorial Park to include preservation of extant resources, rehabilitation of the cultural landscape, and interpretation of the cultural landscape, buildings and features found on the estate from 1899 to 1947 will occur. Building and grounds rehabilitation and future construction will be made based upon interpretive and educational needs and will follow the Secretary of the Interior's Standards for the treatment of historic properties.

Flexible use of historic structures and cultural landscapes will be encouraged to facilitate increased educational and interpretive services and traditional recreation uses for visitors. Primary visitor services will continue at the Flat Top Manor House. Structures' interior spaces might be modified to accommodate interpretive exhibits that facilitate visitors overall understanding of the Cone family, the estate and their influence beyond the boundaries of the park. There will not be any impact on eligibility for National Historic Landmark (NHL) designation as the Parkway will still meet the criteria for designation. For purposes of Section 106, the determination of effect will be no adverse effect.

As the EA states, the project area is not considered to be biologically significant; however, the northern long-eared bat (*Myotis septentrionalis*), which was proposed to be federally listed as an endangered species at the time the EA was prepared, is now listed. They have not been seen in Cone Park, but there is evidence of them to the north and south on the Parkway, and it is likely that they inhabit Cone Park

during portions of the year. Park staff will mitigate any adverse impacts to the bats and/or their habitat, and continue to consult with the U.S. Fish and Wildlife Service for any activities that might affect them.

Degree to which effects on the quality of the human environment are likely to be highly controversial.

There were no controversial impacts identified during either preparation of the EA or the public review period. During this review period, 596 comments were received from interested parties. Thirty-five comments pointed out that they agree with implementing the Preferred Alternative, fifteen were in favor of Alternative Two, and sixteen were in favor of the no action alternative. Many comments expressed keeping current activities on the carriage trails and not limiting use. Comments included recommendations for mitigation and some concerns were expressed about impacts on the local /regional economy if the craft center was removed from the manor house.

Degree to which the possible effects on the quality of the human environment are highly uncertain, or involve unique or unknown risks.

There were no highly uncertain or unique or unknown risks identified during preparation of the EA or the public review period.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The Preferred Alternative does not establish a precedent for any future actions that may have significant effects, nor does it represent decisions about future considerations. Future NPS actions will be evaluated through additional, project-specific planning processes that incorporate the requirements of NEPA and NPS policies.

Whether the action is related to other actions with individually insignificant, but cumulatively significant, impacts.

Impacts of the NPS selected alternative to soils, water resources, vegetation, wildlife, neotropical migratory birds, historic structures, cultural landscapes, archeological resources, ethnographic resources, museum collections, human remains and burials, socioeconomics, visitor use and experience, human health and safety, park operations, concession and commercial services, and transportation were identified. As described in the EA, cumulative impacts were determined by combining the impacts of the NPS Preferred Alternative with other present and reasonably foreseeable future actions. The impacts of other present and reasonably foreseeable future actions on resources, in conjunction with the impacts of the NPS Preferred Alternative, will result in both beneficial and adverse cumulative impacts ranging in intensity from negligible to moderate. Therefore, the NPS Selected Alternative will not contribute or result in significant cumulative impacts.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

Nothing proposed in the Preferred Alternative will have a major adverse impact on the Flat Top Estate Historic District listed in the National Register of Historic Places. Direct impacts on archeological resources from the Preferred Alternative will be minimal as archeological sites will be avoided. If avoidance is impossible, such as in the area of the proposed parking expansion, sufficient data recovery will occur to mitigate the adverse effect of ground disturbance. The archeological survey of the Manor House property will have moderate to major, long-term, beneficial, impacts since the location of these remains will be known and park staff can monitor the conditions of these resources. The North Carolina State Historic Preservation Office has concurred with this determination.

Degree to which the action may adversely affect a T&E species or its critical habitat.

The USFWS, the NCWRC, and the North Carolina Natural Heritage Database were consulted regarding potential impacts of the project on natural heritage resources, including rare, threatened, or endangered plant and animal species. Under the Preferred Alternative, park staff will cut hazardous trees during timeframes which will protect migratory bird nesting. The state listed Yellow-bellied Sapsucker might be adversely impacted from tree removal. Mitigation measures to ensure protection of this species was provided by the NCWRC in a letter dated February 2, 2015, and have been incorporated in the proposed project.

The NLEB will not be jeopardized under tree removal activities with the Preferred Alternative. These findings were confirmed in a response letter from the USFWS dated January 26, 2015. Mitigation measures to ensure protection of this species was also provided by the USFWS in this letter, and have been incorporated in the proposed project. Park staff will continue to consult with the U.S. Fish and Wildlife Service for any future activities for potential impacts.

Whether the action threatens a violation of Federal, State, or local environmental protection law.

The implementation of the Preferred Alternative violates no Federal, State, or local environmental protection laws.

IMPAIRMENT

The National Park Service has determined that implementation of the selected alternative will not constitute an impairment to the Parkway's resources and values. See attached Non-impairment Analysis for additional information.

PUBLIC INVOLVEMENT

The NPS conducted public scoping for the proposed action between November 2006 and May 2007. The Parkway's Superintendent mailed a scoping letter announcing the beginning of the planning process to individuals and organization on the Parkway's planning mailing list. A public notice/news release was published in local newspapers requesting public and agency comments. In addition, the scoping letter was posted and available on the Internet at the park's web site. Through scoping and the public review process, the planning process was conducted in consultation with affected Federal agencies, State and local governments, tribal groups, and interested organizations and individuals.

As a result of the scoping effort, 897 comments were received. All comments were reviewed and analyzed to determine agency and public concerns. Based on scoping comments, and applicable Federal law, regulations, and executive orders, the NPS determined that an EA, not an EIS, was the appropriate level of compliance for the Memorial Park developed area management plan. Public scoping comments and issues raised by NPS staff provided input used in the alternative development process and in the analysis presented in the document.

The EA, prepared in accordance with NEPA, CEQ regulations, Section 106 of the National Historic Preservation Act, and DO #12, was made available for a 36-day public review and comment period which began January 5, 2015, and closed February 9, 2015. A press release announcing the document's availability was published in local newspapers and on the park website. Copies of the document were sent to certain agencies and interested parties; made available at the Parkway's visitor center; and posted

on the internet at the NPS Planning, Environment, and Public Comment website (<http://parkplanning.nps.gov/>). Comments were also accepted at an open house public meeting held in Blowing Rock, North Carolina, on January 15, 2015. There were 596 comments received during this review period.

All comments were reviewed and addressed by the project team. Thirty-five comments pointed out that they agree with implementing the Preferred Alternative, fifteen were in favor of Alternative Two, and sixteen were in favor of the no action alternative. Several comments included recommendations for mitigation and these have been incorporated into the proposed action. A summary of issues raised and NPS responses to those comments are included in Attachments B, C and D. These comments offered suggestions on ways to improve or strengthen the Preferred Alternative, and where appropriate, recommended changes were made to Alternative One to provide more clarity, expand on proposed management strategies, or provide factual correction. All comment letters from agencies, organizations, and businesses have been scanned and are included in Attachment E.

ATTACHMENT A NON-IMPAIRMENT ANALYSIS

NPS *Management Policies 2006* provide an explanation of impairment:

Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

The National Park Service has determined that implementation of the selected alternative will not constitute an impairment to the Parkway's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the EA and the professional judgment of the decision maker guided by the direction in NPS management policies. Project implementation will not result in major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation, (2) key to the natural or cultural integrity of the Parkway or to opportunities for enjoyment of the Parkway; or (3) identified as a goal in the Parkway's General Management Plan or other relevant NPS planning document.

A non-impairment analysis was prepared for the selected alternative described in this Finding of No Significant Impact and chapter 2 of the EA. A non-impairment determination was made for all resource impact topics analyzed for the selected alternative. A non-impairment determination was not made for socioeconomics, visitor use and experience, human health and safety, park operations, transportation, and concessions and commercial services because non-impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act.

Soils

Impacts to soils from implementing the selected alternative will be adverse, short-term, and minor. These impacts will result primarily from construction activities, including replacing a paved road with a dirt/gravel carriage road, creating a new parking area for the Manor House, and removal of vegetation to restore the viewshed. There will be some beneficial impact from leaving stumps and roots in place and planting dogwoods or redbuds which will provide long term soil stabilization, and creating an official trail system in China Orchard and thus reducing erosion in this area as it will replace the unofficial trails that are poorly designed and are not maintained. Because these impacts to soils will collectively be negligible to minor, impairment will not result.

Water Resources, Including Wetlands

Implementation of the selected alternative will have short-term adverse impacts on water quality as turbidity will increase as a result of construction activities. However, the dredging of Bass Lake will result in moderate long-term, beneficial impacts from the reduction in sedimentation. Impairment to water resources will not result because any impacts will be minor and short term. Wetlands will benefit from dredging activities and improved hydrology. Because wetland impacts will be beneficial, impairment to wetlands will not result.

Vegetation

Implementing the selected alternative will have short- and long-term, beneficial, negligible impacts on vegetation from the restoration of orchards, conifer plantations, and expanding the edges of agricultural fields at the manor house. Clearing of vegetation to restore and maintain historic views and planting native species will have negligible to minor, long-term beneficial and adverse impacts as evasive species and second-growth forests will be removed and native species replanted. Because these impacts to vegetation will collectively be negligible to minor, impairment will not result.

Wildlife, Including Neotropical Migratory Birds

Impacts to wildlife from implementing the selected alternative will be negligible to minor, long-term, beneficial or adverse, depending on the species, in the area between the Manor and Bass Lake, from the removal of trees to restore the view. Removal of the vegetation will provide nesting habitat and forage food for several species of birds and mammals, while removing habitat for others. Depending on the species being considered, the impacts will be beneficial with the overall effects being positive, therefore, there will be no impairment to wildlife.

Archeological Resources

Direct impacts on archeological resources from implementing the selected alternative will be minimal as archeological sites will be avoided. There will be moderate to major, long-term, beneficial impacts to archeological resources as an archeological survey of the Manor House property will be performed and thus, the location of these remains will be known and park staff can monitor the conditions of these resources. Because archeological resources impacts will be beneficial, impairment to archeological resources will not result.

Cultural Landscapes

Rehabilitation activities, as proposed in the selected alternative, will preserve the scenic quality and cultural landscape. This will not result in impairment to cultural landscapes because the cultural landscape will actually be enhanced by restoring the historic landscape and returning structures whose materials have been compromised to near-historic status.

Ethnographic Resources

Implementing the selected alternative will have minor to moderate, long-term, beneficial impacts on ethnographic resources on NPS owned lands as activities would be sited to avoid identified ethnographic resources, and Cone heirs and Cone Hospital System will be kept apprised of activities. Because ethnographic resources impacts will be beneficial, impairment to ethnographic resources will not result.

Historic Structures and Properties

Impacts to historic structures from implementing the selected alternative will be minor to moderate, long-term, and beneficial from implementation of user-capacity strategies and reducing space of the craft outlet/book store in the Manor House. Because historic structures impacts will be beneficial, impairment to historic structures and properties will not result.

Museum Collections

Impacts to NPS owned museum collections from implementing the selected alternative will be moderate, long-term and beneficial. The Manor House interpretive exhibit will be used to place original or reproduction artifacts, allowing expansion of the collection. Because the museum collection will be enhanced from implementation of the selected alternative there will be no impairment to museum collections.

Human Remains and Burials

Implementing the selected alternative will have minor to moderate, long-term, beneficial impacts to human remains and burials as the Cone cemetery will continue to be maintained in good condition. Because impacts to human remains and burials will be beneficial, there will be no impairment to human remains and burials.

ATTACHMENT B PUBLIC COMMENTS CONTENT ANALYSIS REPORT

Comment Distribution by Status

Status	Number of Comments
Coded	596
Total	596

Comments Distribution by Code

Code	Code Description	Total
AB1000	Purpose, significance or interpretive theme statements	1
AB1002	No Action Alternative (Continue Current Mgmt.): In favor of No Action Alt.	18
AB1003	Alternative 1 (Preferred) Enhance What We Have: In favor of Alt. 1	35
AB1004	Alternative 1 (Preferred): Opposed to Alternative 1	1
AB1005	Alternative 2 (Cultural Landscape Rehab): In favor of Alt. 2	22
AB1006	Alternative 2 (Cultural Landscape Rehab): Opposed to Alt. 2	25
AB1007	Camp Catawba: In favor of restoring and/or adding a new trail to site	1
AE10000	Affected Environment: Rare Or Unusual Vegetation	1
AE1001	Affected Environment: Hazardous Waste (Superfund Sites)	1
AE11000	Affected Environment: Species Of Special Concern	2
AL4000	Alternatives: New Alternatives Or Elements	17
AL5000	Alternatives: Range of Alternatives	1
AR0032	Archeological Resources: Impacts of Proposal and Alternatives	1
BL5001	Bass Lake: In favor of restoration, clean-up, etc.	1
BS002	Bass Lake: In favor of increased parking	1
CC1000	Consultation and Coordination: General Comments	32
CM0010	Mitigations: Cultural Resources	1
CR4000	Cultural Resources: Impact Of Proposal And Alternatives	9
CT001	Carriage Trails: In favor of keeping as current use (hikers, runners, horses, carriages; no bikes) and not limiting use	212
CT002	Carriage Trails: In favor of allowing bikes on trails	6
CT003	Carriage Trails: In favor of installing interpretive exhibits	2
CT006	Parking: Opposed to eliminating US 221 parking and adding parking within park	2
CT007	Restroom Facilities: In favor of adding additional facilities, i.e., comfort stations, port-a-john, restroom	4

ED1000	Editorial	6
FA001	Forests: In favor of preserving	1
GA1000	Impact Analysis: Impact Analyses	1
HB002	Horseback Riding: Opposed to use on trails	4
HM0002	Horse Manure: Need to address amount of horse manure on trails	5
HT0001	Horse Trailer Parking: In favor of new parking area adjacent to Blowing Rock Charity Horse Show	1
HV001	Historic Vistas: In favor of restoring/opening vistas	7
HV002	Historic Vistas: Opposed to restoring/opening vistas	1
IO1000	Alternatives: Internal Methodology For Establishing Alternatives	2
M2000	Mitigations: Nesting birds, waterfowl, etc.	3
MA0001	Park Operations: Increase park maintenance	5
MH001	Interpretation: In favor of expanding interpretation in the Manor House, as well as other areas	16
MH002	Interpretation: Opposed to expanding interpretation in the Manor House, as well as other areas	4
MI1000	Mitigations: Threatened And Endangered Species	4
MI1001	Mitigations: Stormwater, stream runoff, etc.	1
MI1002	Mitigations: Fish, aquatic species habitat, etc.	1
MI1003	Mitigations: Solid Waste, recyclables, etc.	1
MI1004	Mitigations: Hazardous Waste (Superfund Sites)	1
MI1005	Mitigations: Public Water Systems	2
MI1006	Mitigations: Trail Design	1
MT0002	Mountains-to-Sea Trail: In favor of current routing of MST within Cone Park	5
MT001	MTS Trail: In favor of following existing carriage trails	1
MT001	Mountains-to-Sea Trail: Memo of Agreement with MST	2
MT1000	Miscellaneous Topics: General Comments	134
OR001	Orchards: In favor of restoring historic orchards	5
PA001	Partnerships/Volunteers: In favor of using	22
PK001	Parking at Manor House: In favor of expanding parking area	14
PK002	Parking at Manor House: Opposed to expanding parking area	3
PO4000	Park Operations: Impact Of Proposal And Alternatives	5
PS2000	VALUES - Value the partnerships, local communities, etc.	36
RF1000	References: General Comments	10
RO001	Rock climbing: In favor of keeping	42
SD1001	Sunset Drive Carriage Trail: In favor of rehabilitation	7
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	3
SE5000	Socioeconomics: Cumulative Impacts	76

TC100	THREATS - Threats to cultural resources	3
TE1000	Threatened And Endangered Species: Guiding Policies, Regs And Laws	4
TE4000	Threatened And Endangered Species: Impact Of Proposal And Alternatives	3
TL001	Trout Lake: In favor of closing current entrance road/restoring to carriage trail, current exit drive constructed for 2-way traffic	1
TL1001	Trout Lake: In favor of trail around entire lake	2
TN100	THREATS - Threats to natural resources	8
TP100	THREATS - to park operations or general management	11
TR0001	Trails: In favor of adding/rehabilitating existing/new trails	2
TS001	Craft Center: In favor of continuing in Manor House	30
TS002	Craft Center: Opposed to remaining in Manor House and/or in favor of relocating	13
TV100	THREATS - Threats to visitor use or experience	19
VC2001	Visitor Center: In favor of constructing new visitor center	2
VE0001	Visitor Experience: Visitor suggestions to enhance experience	17
VE4000	Visitor Experience: Impact Of Proposal And Alternatives	5
VH100	VALUES - Value the history or cultural resources	24
VN100	VALUES - Value the natural resources or setting (flora, fauna, views, natural quiet, undeveloped areas)	22
VU4000	Visitor Use: Impact Of Proposal And Alternatives	1
VV100	VALUES - Value the visitor opportunities (activities, programs, recreation)	142

Correspondence Distribution by State

State	Percentage	Number of Correspondence
NC	79.7 %	255
FL	4.1 %	13
SC	2.8 %	9
GA	2.5 %	8
VA	2.2 %	7
MD	1.3 %	4
TN	1.3 %	4
CO	0.9 %	3
PA	0.6 %	2
TX	0.6 %	2
WA	0.3 %	1
AZ	0.3 %	1
NY	0.3 %	1
IA	0.3 %	1

UT	0.3 %	1
IL	0.3 %	1
MI	0.3 %	1
MA	0.3 %	1
ND	0.3 %	1
CA	0.3 %	1
KY	0.3 %	1
MN	0.3 %	1
WV	0.3 %	1
Total	—	320

Correspondence Signature Count by Organization Type

Organization Type	Correspondences	Signatures
Business	13—	13—
Civic Groups	3—	3—
Conservation/Preservation	4—	4—
County Government	2—	2—
Federal Government	1—	1—
Recreational Groups	14—	14—
State Government	15—	15—
Unaffiliated Individual	264—	264—
University/Professional Society	4—	4—
Total	320—	320—

Correspondence Distribution by Correspondence Type

Type	Number of Correspondences
Web Form	295—
E-mail	20—
Letter	3—
Park Form	2—
Total	320—

ATTACHMENT C CONCERN RESPONSE REPORT

NPS Responses to Comments

Comments that contain essential points regarding information in the draft developed area management plan / environmental assessment or comments that need clarification are extracted below. A concern statement has been developed to summarize each of these comments or collections of similar comments. Following each concern statement, “representative quotes” are also included from original letters, edited only for style consistency and spelling. Representative quotes are a select subset or sampling of comments taken directly from the correspondence to illustrate the issue, concern, or idea expressed by the comments grouped under that concern statement. An NPS response is then provided for each concern statement.

Concern Statement #1: *Alternatives: New Alternatives or Elements to Alternatives*

Concern ID: 53501

Representative Quote: “We generally support the conclusion of the analysis and the recommendations included in Alternative One. However, we believe, as was done in the overall General Management Plan for the Parkway, that modification and incorporation of a couple of the management actions from Alternative Two into Alternative One would provide an even greater advantage (GMP, p. 37).

The Foundation understands that modifications to the selected alternative in the DAMP (Alternative One) can be made if there is substantial and sound justification for doing so. In fact, The Blue Ridge Parkway modified its own preferred alternative for the General Management Plan when it became clear that “zoning allocation found in alternative C could be incorporated into alternative B to provide even greater advantage” (GMP, p. 37). In addition, just as in the GMP (and both Alternatives in the DAMP), where proposed action costs exceed current budgets, it does not prevent actions from being included in the preferred alternative and acknowledges that “mitigation” by outside partners would assist in implementation costs.”

Concern ID: 53504

Representative Quote: “Recognizing that management alternatives in the DAMP occur along a continuum from doing nothing (No Action) to doing everything (Alternative Two), and since the difference between the on-going operational costs of implementing each alternative is relatively low (\$52,862, Table p.101), we offer the following recommendations for modification and refinement of the selected alternative (Alternative One) to increase substantially the benefits to the cultural landscape, the visitor experience and resource protection while simultaneously keeping implementation costs within reasonable limits and minimizing negative economic impacts.

Incorporate “Landscape rehabilitation in and around the vicinity of Flat Top Manor House and gardens” as identified in Alternative Two (p. 103, Table 9) at a one-time facility cost of \$1,239,781. The addition of this element from Alternative Two would most closely align with the National Historic Preservation Act and the National Level of Significance of the landscape architecture of the estate, meet many of the DAMP’s own recommendations resulting in the greatest benefit for the visitor experience and would likely lead to “new opportunities for local and regional economies...”(p.175). In addition, the inclusion of this element from Alternative Two would most likely result in the “greatest potential for protection and preservation of cultural landscape” (p. 165).

Incorporate "Identification and Care regime for landscape plantings" as identified in Alternative Two (Table 10, p. 104) at a one-time cost of \$87,050. The addition of this element would enable the most appropriate level of care for the restored cultural landscape around Flat Top Manor. Just as the Foundation and the National Park Service have done with the restoration of the hydrangea beds at Bass Lake working with the Garden Clubs and extension agents in Blowing Rock and as indicated in the DAMP, this can be achieved through entering into "partnerships with individuals and organizations to expand garden restoration..." (p. 110)."

Concern ID: 53651

Representative Quote: "Recommendation: The NPSs preferred alternative should be a modified Alternative One. This modified preferred alternative would ensure that all parts of the cultural landscape are managed and those landscape features that are most pertinent to the Cone estate story would be rehabilitated and interpreted. The modified preferred Alternative One should provide both park staff and the public and park partners with a plan they can literally become invested in to assist the park in protecting the cultural landscape and to tell the Cone story, a story that is ready to be told."

Concern ID: 53650

Representative Quote: "Inadequate restroom facility for Alt. One. Alt. One does not propose to increase comfort station capacity near the Manor House while it proposes to expand the existing 45 space visitor parking area by adding 104 car and RV parking spaces. This more than triples the size of existing visitor parking area and consequentially the demand for restroom capacity would increase dramatically. Given that the existing carriage house restroom facility is now inadequate on busy days, it would be totally overwhelmed with increased visitation associated with the larger visitor parking area."

Concern ID: 53668

Representative Quote: "Consider the inclusion of one comfort station (or expansion of the existing one) at or near the Manor House. Any new construction could be done in a similar manner as the facility at Bass Lake (~cost of \$100,000). Any Alternative, besides the No Action Alternative, selected indicates that the result could be increased visitation and use of the site which could prompt the need for increased visitor amenities including a convenience station. If a new convenience station is not included in the modified preferred alternative, remove the language on page 60 that appears to preclude any new construction. Restrictive language could impede progress in the event that funding and needs align in such a way as to dictate the construction of a new facility."

NPS Response: The NPS will implement a modification to the preferred alternative, Alternative One "Enhance What We Have" which will allow for rehabilitation of the cultural landscape around Flat Top Manor to a greater degree and will also provide more opportunity to interpret and share the story of the Cone Family and their life at the estate. Rehabilitation will be consistent with Secretary of the Interior's treatment standards. While the NPS preferred alternative does not specifically identify siting and construction of a new restroom facility, it does not preclude the construction of such a facility. Should an additional restroom facility become a critical need and priority, identification of an appropriate site location would be conducted and evaluated in a separate NEPA document for potential impacts to park resources under the NEPA/DO-12 and other federal laws, such as the National Historic Preservation Act/Section 106. Construction of a new restroom facility, compliant with appropriate NPS law and policy, is not inconsistent with the NPS preferred alternative.

Concern Statement #2: Alternatives: Range of Alternatives**Concern ID: 53649**

Representative Quote: “Manor House cultural landscape rehabilitation and interpretation missing in Alternative One. Alternative One (Enhance What We Have), the NPS preferred alternative does not include any specific proposed actions to rehabilitate or interpret the cultural landscape surrounding the Manor House, while Alternative Two (Cultural Landscape Rehabilitation) includes several rehabilitation and interpretive proposed actions. This doing nothing compared to doing everything disparity between the two action alternatives illustrates a flaw (in my mind) in Alternative Ones Manor House proposals.”

NPS Response: National Park Service planning and compliance staff and subject matter experts have re-examined the preferred alternative in light of comments received and have incorporated elements from action alternative two into the preferred alternative. The modified preferred alternative, Alternative One "Enhance What We Have" will allow for rehabilitation of the cultural landscape around Flat Top Manor to a greater degree, which will also provide more opportunity to interpret and share the story of the Cone Family and their life at the estate. Rehabilitation will be consistent with Secretary of the Interior's treatment standards.

Concern Statement #3: Cultural Resources: Impact of Proposal and Alternatives**Concern ID: 53938**

Representative Quotes: “We understand that Alternative One is NPS' preferred alternative, in part because the approach will not require a restoration approach to Cone-era buildings and landscape features or require construction of new facilities. We concur that rehabilitation, rather than restoration, of existing structures is a viable management approach. We are concerned however, that NPS considers the "enhance what we have," existing building rehabilitation approach to be incompatible with interpretation of the site as a County Place Era estate. We believe that it is possible to take a maintenance or rehabilitation approach to selected components of the buildings and grounds while also interpreting the historic architectural, and landscape significance documented in the recent National Register nomination. Interpretive initiatives might include tours, talks, publications, exhibits, signage, or other materials that explore or illustrate the County Place Era design, use, and evolution of the site-none of which would necessarily require building or landscape restoration. Even with the selection of Alternative One as the preferred management approach, we recommend against interpreting the extended Cone Family to the exclusion of specific Flat Top Manor history that was documented in the National Register nomination. The nomination establishes national significance of the site as a country house and landscape, and we believe that this history must be presented to the public along with information about the broader significance of the Cone family.”

NPS Response: Park staff believes that the addition of Landscape rehabilitation in the vicinity of Flat Top Manor House and Gardens from Alternative Two to the Preferred Alternative is appropriate. The proposed rehabilitation of the surrounding landscape features and structures will follow the Secretary of the Interior's Standards for Rehabilitation of historic properties. These properties include the vegetable and flower gardens to the west of the Flat Top Manor House, croquet and tennis courts near the gardens, laundry, Ice house, carbide plant adjacent to and rear of Flat Top Manor House, bowling alley near the vegetable gardens, and the rose arbor, raspberry beds and gardens below the carriage house and other farm buildings such as the dairy barn and chicken house. The 2014 Cultural Landscape Report Update recommends clearing "the successional growth on the sites of the historic croquet lawn, tennis court, laundry building, and bowling alley" and to mark the and interpret the building foundation locations.(CLR Update, 69). These proposed actions are within the Secretary of the Interior's rehabilitation approach. Replacing or reconstructing former structures will not occur since sufficient

documentation does not exist to accurately portray the property during the period of significance (CLR Update, 45). Changes in the vegetation will be limited to rehabilitation of the existing vegetation within the cultural landscape. Rehabilitation of existing peonies in the garden behind the house and raspberries and roses in the terraced garden below the house could occur.

The preferred alternative will interpret the history of the Flat Top Manor as documented in the recent National Register nomination. This will be accomplished through the use of guided tours, self-guided tours with interpretive signage, publications, and exhibits relating the history of the home, associated outbuildings, and the cultural landscape in the context of the Country Place Era. This information as well as the history of the extended Cone family will be presented to the public.

Concern Statement #4: *Impact Analysis: Impact Analyses*

Concern ID: 53524

Representative Quotes: “Reading the impacts to the environment section, I found no reference to impacts to water quality, erosion, etc. related to increase horse use on carriage trails resulting from increased horse trailer parking. I question that there would be no impacts on water quality to the streams or lakes. The question of further increases in recreational activity is a similar concern.”

NPS Response: The park has had an on-site visit with Dr. Shea Tuberty who teaches ecotoxicology at Appalachian State University, during which horse wastes and potential impacts to park waters was discussed. He felt there was no concern with wastes entering park waters because of the distances between carriage roads and water sources, the relatively low level of horse use over the 25 miles of trails, and the existence of good vegetative cover between the roads and water. In addition, only a very small portion of the carriage road crosses streams, providing minimal entry into the water system. Also, horses are not allowed around Bass Lake where excess excrement could increase nitrification of the lake. Park resource staff does not feel that even with the amount of increase in horse use that would occur under this plan would be enough to cause any problem.

Concern Statement #5: *Socioeconomics: Impact Of Proposal and Alternatives*

Concern ID: 53509

Representative Quote: “Although the Foundation is not advocating for all of the elements within Alternative Two, it is helpful to examine the long-term benefits and adverse impacts of each proposed alternative. After analyzing the differences between the potential major long-term benefits and major long-term adverse impacts of each alternative found in the DAMP (not including those found identically in both alternatives), it is clear that Alternative Two results in the greatest number of long-term benefits with the least long-term adverse impacts. There are no potential major long-term benefits identified in Alternative One that are not also found in Alternative Two. On the other hand, there are four major long-term potential benefits outlined for Alternative Two, including the cultural landscape, historic structures, socio-economics, and the visitor use and experience (DAMP p.151-183). The major impact of Alternative Two would affect concession services with moderate (short-term) adverse impact to revenue for the current concessionaire (until they relocate). Conversely, leaving the Guild intact is the only potentially major adverse impact of Alternative One to Flat Top Manor.”

Concern ID: 53511

Representative Quotes: “In the plan, there is reference to the fact that the concessions contract process is underway and that will determine whether or not a concessions operator will continue on the first floor of the estate. Alternative 1 indicates that there will be one. There is a conflict in my mind. First a "necessary and appropriate" determination must be made as required by the 1998 law. That is followed by the

process of determining the contract requirements and financial viability evaluation. Unless the concessions contract requires sales items to relate to the Estate, I would suggest that the retail sales operation could operate just as well in Blowing Rock.”

Concern ID: 53654

Representative Quote: “Eliminate the concession contract - I think that it is time for park management to begin phasing out concession use of the Manor House both for cultural resource and visitor use management reasons. There have been issues over the years with over loading electrical outlets, food storage and consumption, storage of supplies and inventory stock and use of the historic rooms for sales. The placement of display cases has been maximized to the point that very few of the architectural details of the house interior can be seen in an unobstructed manner. The entrance foyer is a collection of display cases that impact circulation and the sense of entry into a historic house.

The Cone story is complex including several individuals and Memorial Park landscape features and structures. Providing an appropriate level of context and specific details to present the several interpretive themes warrants providing visitors with a facility to orient and educate them about the Cones and their country estate. The minimal income the park receives from the concession fee would need to be offset by maybe charging for room tours and/or by other means, such as partners helping augment the financial requirements.

Visitor feedback about the on-going house tours supports making more of the house interior available for viewing and interpretation and less for concession craft sales.

This would also save the NPS \$100,000 or more required to offer and approve a concession contract.”

NPS Response: A business opportunity has operated at the site for many years without major adverse impact and is consistent with others in the park that sell hand-crafted items representing Appalachian culture. The preferred alternative proposes to continue this activity by initiating the competitive process to secure an operator. An early step in that process will be defining the opportunity, space assignment, and franchise fee that is returned to the park. The preferred alternative provides for decreasing the sales area to accommodate and facilitate additional interpretation. The process also requires the agency to clearly define appropriate sales items that further understanding of the park and its mission of providing visitor experiences of Appalachian culture. Following identification of space and appropriate sales items, a feasibility analysis will be conducted. If the analysis concludes that there is reasonable expectation of profit, the business opportunity will be offered competitively.

ATTACHMENT D ENVIRONMENTAL ASSESSMENT ERRATA SHEETS

Blue Ridge Parkway North Carolina

These errata sheets should be attached to the original environmental assessment to form the complete record of the environmental impact analysis and conservation planning completed for the project. The combination of the EA and these errata, prepared in response to public comments on the EA, form the complete and final record of the Finding of No Significant Impact.

The environmental assessment was available for public review and comment for a 36-day period from January 5 through February 9, 2015. The comments received were analyzed to determine whether any new issues, reasonable alternatives, potential for significant impacts, or mitigation measures were suggested. No significant concerns were raised that could not be addressed by minor modifications to the plan. Most of these comments offered suggestions on ways to improve or strengthen the NPS Preferred Alternative, and the alternative elements that were not originally in the Preferred Alternative were assessed within the EA and adding them to the Preferred Alternative did not change the impact analysis. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with National Park Service policy are not considered substantive. Public comments received resulted in clarification of policy, alternatives, or procedures and did not provide substantive information to change the plan's purpose, goals, objectives, selected alternative, and environmental impact analysis.

Changes to the environmental assessment are outlined below. Language that is changed or added is identified by italics. The page number refers to the draft document that was reviewed by the public.

EA Clarifications and Additions

Summary, No-Action Alternative

Page vi text reads: Bouldering would continue at China Orchard area and a new horse trailer parking area would be created adjacent to the Blowing Rock Charity Horse Show grounds accessed by Laurel Lane and US 221.

Changes made reads: Bouldering (*i.e.: ropeless climbing that concentrates on short, sequential moves on rock usually no more than 15 feet off the ground*) would continue at China Orchard area and a new horse trailer parking area would be created adjacent to the Blowing Rock Charity Horse Show grounds accessed by Laurel Lane and US 221.

Page vii text reads: Full implementation of this alternative would require some modest additional capital investment and operations increases that are not programmed at this time.

Page vii language removed: *modest*

Summary, Alternative Two

Page vii text reads: Recreation would focus on the traditional recreational uses envisioned by the Cones; the exceptions being the allowance of bouldering at China Orchard and public fishing at Bass Lake.

Changes made reads: Recreation would focus on the traditional recreational uses envisioned by the Cones; the exceptions being the allowance of bouldering at China Orchard and public fishing at Bass Lake, *which were not traditional uses*.

Alternatives, Alternative One, Concept

Page 60 text reads: Full implementation of this alternative would require some modest additional capital investment and operations increases that are not programmed at this time.

Page 60 language removed: *modest*

Alternatives, Alternative One, Visitor Experience Emphasis

In the document, language was added to state that compliance with the Secretary's Standards for Preservation and Rehabilitation will be applied to the site regardless of which Alternative is selected.

Page 61 text reads: Primary visitor services and programs would continue at the Flat Top Manor House. Historic structures' interior spaces may be modified to accommodate interpretive exhibits to facilitate visitors overall understanding of the Cone family, the estate as well as the Southern textile industry and Moses Cone's role in denim manufacturing.

Changes made reads: Primary visitor services and programs would continue at the Flat Top Manor House. Historic structures' interior spaces may be modified *according to Secretary's Standards* to accommodate interpretive exhibits to facilitate visitors overall understanding of the Cone family, the estate as well as the Southern textile industry and Moses Cone's role in denim manufacturing.

Alternatives, Alternative One, Historic Building Resource Landscape Units, Flat Top Manor House

Page 63 text reads: The existing parking area would be expanded (see **Figure 10**).

Change made reads: The existing parking area *could* be expanded (see **Figure 10**).

Mitigation Measures Common to the Action Alternatives, Natural Resources, Soils

Page 82 text reads: Existing, subject to compaction, erosion and muddiness would be properly maintained by volunteer groups under Memorandum of Agreement according to NPS standards.

Change made reads: Existing *trails*, subject to compaction, erosion and muddiness would be properly maintained by volunteer groups under Memorandum of Agreement according to NPS standards.

Mitigation Measures Common to the Action Alternatives, Natural Resources, Wildlife

In the document, language was added to show the change in species status and clarify mitigation.

Page 84 text reads: To protect the soon to be listed Northern Long-eared bat, park staff would cut trees during the fall and winter seasons, unless consultation with the U.S. Fish and Wildlife Service provides otherwise.

Change made reads: To protect the *federally* listed Northern Long-eared bat, park staff would cut trees *outside of the period when young bats are unable to fly (June and July)*, unless consultation with the U.S. Fish and Wildlife Service provides otherwise.

ATTACHMENT E

AGENCY/ORGANIZATION COMMENTS



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Asheville Field Office
160 Zillicoa Street
Asheville, North Carolina 28801

January 26, 2015

Blue Ridge Parkway
Attn: Ms. Suzette Molling
199 Hemphill Knob Road
Asheville, NC 28803-8686

Dear Ms. Molling:

Subject: Moses H. Cone Memorial Park Developed Area Management Plan, Watauga County,
North Carolina

We received your letter of January 5, 2015, transmitting and requesting our comments on the subject management plan. The following comments are provided in accordance with the provisions of the Migratory Bird Treaty Act, as amended (16 U.S.C. 703); the National Environmental Policy Act (42 U.S.C. § 4321 et seq.); and section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1543) (Act).

We have no major objections to and support the National Park Service's preferred alternative (Alternative 1) for management of the Moses H. Cone Memorial Park (Park). We agree that there are no federally listed threatened or endangered species currently known from the Park. However, as noted in the Moses H. Cone Memorial Park Developed Area Management Plan (Plan), the northern long-eared bat (*Myotis septentrionalis*) may inhabit the Park during portions of the year.

The likely presence of the northern long-eared bat during at least a portion of the year and the tree felling/removal proposed by the Plan will necessitate consultation under section 7 of the Endangered Species Act (Act) once the listing is finalized (about April 2, 2015). While the species is proposed, Section 7(a)(4) of the Act states that "Each Federal agency shall confer with the Secretary on any agency action which is likely to jeopardize the continued existence of any species proposed to be listed ... or result in the destruction or adverse modification of critical habitat proposed to be designated for such species (please note that, at this time, no designated critical habitat has been proposed for the northern long-eared bat). This paragraph does not require a limitation on the commitment of resources as described in subsection (d)." Section 7(a)(4) was added to the Act to provide a mechanism for identifying and resolving potential conflicts between a proposed action and proposed species or proposed critical habitat at an early planning stage. While consultations are required when the proposed action may affect listed

species, a conference is required only when the proposed action is likely to jeopardize the continued existence of a proposed species or destroy or adversely modify proposed critical habitat. However, Federal action agencies may request a conference on any proposed action that may affect proposed species or proposed critical habitat. The Service also can request a conference after reviewing available information suggesting a proposed action is likely to jeopardize proposed species or destroy or adversely modify proposed critical habitat.

While at this time we have no reason to believe that the proposed tree removal activities will jeopardize the continued existence of the northern long-eared bat (and thus a conference is not necessary), in order to avoid possible direct affects to the northern long-eared bat, tree felling must occur outside of the period when young bats are unable to fly (June and July), else, further consultation will be required for this species when the final rule becomes effective¹. Though the lead federal agency (National Park Service) for this project is not prohibited from jeopardizing the continued existence of a proposed species until the species becomes listed, as soon as the listing becomes effective, the prohibition against jeopardy applies, as does the prohibition against taking a listed species under section 9 of the Endangered Species Act², **regardless of the proposed action's stage of completion** - this could require stopping the project until consultation is completed.

We concur with your assessment that the proposed project will not affect any threatened or endangered species and that the project will not jeopardize (as described in Section 7(a)(4) of the Endangered Species Act of 1973) the northern long-eared bat. Therefore, the requirements under section 7(c) of the Endangered Species Act are fulfilled. However, obligations under section 7 of the Endangered Species Act must be reconsidered if: (1) new information reveals impacts of this identified action that may affect listed species or critical habitat in a manner not previously considered, (2) this action is subsequently modified in a manner that was not considered in this review, or (3) a new species is listed or critical habitat is determined that may be affected by the identified action.

Thank you for allowing us to comment on this project. Please contact Mr. Allen Ratzlaff of our staff at 828/258-3939, Ext. 229, if you have any questions. In any future correspondence concerning this project, please reference our Log Number 4-2-15-124.

E-Copy: Andrea Leslie, North Carolina Wildlife Resources Commission,
andrea.leslie@ncwildlife.org

¹ We expect the final rule for the listing of the northern long-eared bat to be on or about April 2, 2015, and becoming effective on or about May 2, 2015.

² It is possible that the northern long-eared but will be given a threatened status accompanied by a 4(d) rule that exempts some activities from "take".



**North Carolina Department of Cultural Resources
State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Pat McCrory
Secretary Susan Kluttz

Office of Archives and History
Deputy Secretary Kevin Cherry

March 23, 2015

Mark H. Woods
National Park Service
Blue Ridge Parkway
199 Hemphill Knob Road
Asheville, NC 28803

mark_woods@nps.gov

Re: Developed Area Management Plan/Environmental Assessment of the Moses H. Cone Memorial Park,
Watauga County, CH 15-0124

Dear Mr. Woods:

Thank you for your submittal of January 21, 2015, concerning the above-referenced undertaking. We have reviewed the Developed Area Management Plan (DAMP)/Environmental Assessment for the Moses H. Cone Memorial Park and offer the following comments.

We concur with your findings regarding archaeological resources.

We understand that Alternative One is NPS' preferred alternative, in part because the approach will not require a restoration approach to Cone-era buildings and landscape features or require construction of new facilities. We concur that rehabilitation, rather than restoration, of existing structures is a viable management approach. We are concerned however, that NPS considers the "enhance what we have," existing building rehabilitation approach to be incompatible with interpretation of the site as a County Place Era estate. We believe that it is possible to take a maintenance or rehabilitation approach to selected components of the buildings and grounds while also interpreting the historic architectural, and landscape significance documented in the recent National Register nomination. Interpretive initiatives might include tours, talks, publications, exhibits, signage, or other materials that explore or illustrate the County Place Era design, use, and evolution of the site—none of which would necessarily require building or landscape restoration. Even with the selection of Alternative One as the preferred management approach, we recommend against interpreting the extended Cone Family to the exclusion of specific Flat Top Manor history that was documented in the National Register nomination. The nomination establishes national significance of the site as a country house and landscape, and we believe that this history must be presented to the public along with information about the broader significance of the Cone family.

We also note that observance of the Secretary of Interior's Standards for maintenance and building reuse were cited in evaluation of Alternative Two, but not in Alternative One. We assert that compliance of the *Secretary's Standards for Preservation and Rehabilitation* will be applied to the site regardless of which Alternative is selected.

Location: 109 East Jones Street, Raleigh NC 27601 **Mailing Address:** 4617 Mail Service Center, Raleigh NC 27699-4617 **Telephone/Fax:** (919) 807-6570/807-6599

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-807-6579 or environmental.review@nhdcr.gov. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



 Ramona M. Bartos

cc: State Clearinghouse



PO BOX 10431
RALEIGH, NC 27605

919-698-9024
WWW.NCMST.ORG

February 6, 2015

Blue Ridge Parkway
Attn: Suzette Molling
199 Hemphill Knob Road
Asheville, NC 28803

Dear Ms. Molling:

Enclosed are our comments on the draft management plan for the Moses H. Cone Memorial Park Developed Area. We appreciate the opportunity to participate in this process and to assist the Parkway in its work to protect this special place and make it available to the public.

Please let me know if you have additional questions.

Sincerely,

Kate Dixon
Executive Director

**Friends of the Mountains to Sea Trail Review Comments for
MOSES H. CONE MEMORIAL PARK DEVELOPED AREA MANAGEMENT PLAN
Environmental Assessment
January 2015**

Page 9

"Mountains to Sea Trail Memorandum of Agreement

This is an agreement of cooperation among the Parkway; the U.S. Forest Service; the North Carolina Department of Environment, Health, and Natural Resources; and the Friends of the Mountains-to-Sea Trail organization for planning and construction of the Mountains-to-Sea Trail system. Much of this trail is on parkway lands in North Carolina between the Great Smoky Mountains National Park and the Doughton Park recreation area. Trail maintenance is the responsibility of the Friends of the Mountains-to-Sea Trail volunteers."

COMMENT: The State/Federal Memorandum of Agreement for the MST was initially signed on November 27, 1979 and has remained in effect to date. While the FMST is not presently a formal party to the agreement we feel it would be appropriate to be included. As the principal statewide volunteer service organization whose primary role is promoting and maintaining the trail we appreciate that the Cone management plan recognizes our partnership. We are pursuing a possible amendment to the present State/Federal MOA to include FMST.

Page 15

"RELATIONSHIP OF THIS PLAN TO OTHER PLANNING EFFORTS

Moses H. Cone Memorial Park is managed by the Blue Ridge Parkway as part of the Highlands District. The Highlands District encompasses some 89 miles of the Parkway from milepost 217 at the Virginia/North Carolina state line to milepost 306. The Memorial Park is located in Watauga County, North Carolina adjacent to the town of Blowing Rock and some five miles from the town of Boone. A portion of the Park boundary is bordered by Pisgah National Forest. Grandfather Mountain State Park and the lands owned and operated by the nonprofit Grandfather Mountain Stewardship Foundation are located nearby. There is one long distance trail regionally designated trail-the Mountains-to-Sea Trail that traverses the Memorial Park. Parkway staff is currently working with those neighbors and partners to better understand the interrelationship of these planning efforts to the Parkway."

COMMENT: The Friends of the Mountains to Sea Trail (FMST) is presently engaged with the Parkway and the Division of Parks and Recreation in the development of a Highlands District memorandum of agreement for the MST that will address our various roles and responsibilities for planning, building, maintaining and promoting the MST. We appreciate the support of the parkway district and headquarters staff in our efforts to train volunteers, to jointly maintain developed area segments of the trail, to protect sensitive park resources and to provide high quality outdoor recreation experiences in a safe environment. We look forward to growing this productive and mutually beneficial relationship with all our regional trail partners.

Page 53

"Trout Lake Road, Wadkins Road

The Mountains-to-Sea Trail has been routed through the estate using existing carriage road trails (including Rich Mountain road). The trail would remain where currently routed."

COMMENT: We concur with plans to keep the present routing of the MST within Cone Park.

**Friends of the Mountains to Sea Trail Review Comments for
MOSES H. CONE MEMORIAL PARK DEVELOPED AREA MANAGEMENT PLAN
Environmental Assessment
January 2015**

Page 58

"Wadkins Road"

The Mountains to Sea trail has been routed through the estate and the portion on Wadkins Road trail would continue to be used and maintained."

COMMENT: We concur with plans to keep the present routing of the MST within Cone Park.

Page 59

"Figure 9. No Action Alternative"

COMMENT: We concur with continued routing of the MST through the estate using existing carriage trails as depicted in Figure 9. We will work with parkway staff to place and maintain minimal trail markers or blazes at trail junctions to help hikers follow the designated route.

Page 65

"Wadkins Road"

The Mountains to Sea trail has been routed through the estate and the portion on Wadkins Road would continue to be used and maintained."

COMMENT: We concur with plans to keep the present routing of the MST within Cone Park.

Page 67

"Figure 12. Alternative One"

COMMENT: We concur with continued routing of the MST through the estate using existing carriage trails as depicted in Figure 12. We will work with parkway staff to place and maintain minimal trail markers or blazes at trail junctions to help hikers follow the designated route. We will work with the parkway staff to help maintain MST passage during construction of additional Manor House parking or other improvements to the carriage trails.

Page 107

"Table 11. Summary Comparison of the Alternatives"

Trout Lake Road, Wadkins Road - The Mountains-to-Sea Trail has been routed through the estate using existing carriage road trails. The trail would remain where currently routed. Note: A portion of the trail was newly constructed on the backside of Rich Mountain where it does meet carriage roads."

COMMENT: Again, we concur with the plan's provision in all alternatives for continued routing of the MST through the estate using existing carriage trails. It is good to recognize in this table that a portion of the MST is newly constructed footpath connecting the Rich Mountain carriage trail to Shulls Mill Road. The trail intersection with Shulls Mill Road may need consideration for design safety enhancements.



On behalf of the Blue Ridge Parkway Foundation staff and Board of Trustees, I am writing in response to your request for comments on the Moses H. Cone Memorial Park Developed Area Management Plan (DAMP) and Environmental Assessment (EA) dated January 2015. The Blue Ridge Parkway Foundation (BRPF) has long invested in the completion of the DAMP and has financially supported the process, work and creation of supporting documents leading to the DAMP.

Since its inception in 1997, the Foundation has invested almost 1 million dollars in support of Moses H. Cone Memorial Park with projects including the completion of the Historical Furnishings Report, the National Historic Registry Nomination, Phase I and Phase II of the DAMP, oral histories studies, and multiple environmental and cultural resource protection projects on the estate. The Flat Top Estate Historic District, now Moses H. Cone Memorial Park represents a unique and culturally significant site along the Blue Ridge Parkway deserving of a comprehensive, forward-looking plan (DAMP), and we welcome the opportunity to comment on the DAMP.

The BRPF proposes a blended Alternative to the suggested plan and offers the following comments on the DAMP:

1. We would like to thank the Park staff for their work over the last 15 years on the DAMP. We appreciate the collaboration with the Park Service on the completion of this plan and look forward to continuing this relationship. We are pleased to see this long process come to a close and are happy to begin the next Phase and see the actions in the plan come to fruition. We also appreciate the care and consideration taken to ensure the protection and preservation of this unique resource on the Parkway.
2. We generally support the conclusion of the analysis and the recommendations included in Alternative One. However, we believe, as was done in the overall General Management Plan for the Parkway, that modification and incorporation of a couple of the management actions from Alternative Two into Alternative One would provide an even greater advantage (GMP, p. 37).
3. In 2014, the National Register of Historic Places nomination process was completed for Flat Top Estate. Although Flat Top Manor itself and the social stories and history are of state level significance, only the landscape architecture achieved national recognition. "The historic district is nationally significant under the National Register Criterion C in the area of landscape architecture for the planning of the estate, in particular the extensive network of carriage roads and associated plantings designed by Moses Cone" (USDI, National Register, p. 36). Alternative Two (Cultural Landscape Rehabilitation) is the alternative that "has the greatest potential for protection and preservation of the cultural landscape" and thus the best alternative to address the mandated requirements of preservation under the National Historic Preservation Act

(Section 106) (DAMP, p. 165). Not only is Alternative Two the best to protect the nationally significant cultural landscape, but Alternative One may pose a “moderate long-term adverse impact to the visitor experience if the cultural landscape is not able to be maintained or restored in the future” (DAMP, p. 176). The DAMP concludes that “Alternative Two would provide major long-term beneficial impacts to visitor use and experience, including recreational and visual resources” while Alternative One would provide only “moderate long-term beneficial impacts to visitor use and experience, including recreation and visual resources” (p. 177 and P. 176 respectively).

4. The Foundation understands that modifications to the selected alternative in the DAMP (Alternative One) can be made if there is substantial and sound justification for doing so. In fact, The Blue Ridge Parkway modified its own preferred alternative for the General Management Plan when it became clear that “zoning allocation found in alternative C could be incorporated into alternative B to provide even greater advantage” (GMP, p. 37). In addition, just as in the GMP (and both Alternatives in the DAMP), where proposed action costs exceed current budgets, it does not prevent actions from being included in the preferred alternative and acknowledges that “mitigation” by outside partners would assist in implementation costs.
5. Recognizing that management alternatives in the DAMP occur along a continuum from doing nothing (No Action) to doing everything (Alternative Two), and since the difference between the on-going operational costs of implementing each alternative is relatively low (\$52,862, Table p.101), we offer the following recommendations for modification and refinement of the selected alternative (Alternative One) to increase substantially the benefits to the cultural landscape, the visitor experience and resource protection while simultaneously keeping implementation costs within reasonable limits and minimizing negative economic impacts.
 - a. Incorporate “Landscape rehabilitation in and around the vicinity of Flat Top Manor House and gardens” as identified in Alternative Two (p. 103, Table 9) at a one-time facility cost of \$1,239,781. The addition of this element from Alternative Two would most closely align with the National Historic Preservation Act and the National Level of Significance of the landscape architecture of the estate, meet many of the DAMP’s own recommendations resulting in the greatest benefit for the visitor experience and would likely lead to “new opportunities for local and regional economies...”(p.175). In addition, the inclusion of this element from Alternative Two would most likely result in the “greatest potential for protection and preservation of cultural landscape” (p. 165).
 - b. Incorporate “Identification and Care regime for landscape plantings” as identified in Alternative Two (Table 10, p. 104) at a one-time cost of \$87,050. The addition of this element would enable the most appropriate level of care for the restored cultural landscape around Flat Top Manor. Just as the Foundation and the National Park Service have done with the restoration of the hydrangea beds at Bass Lake working with the Garden Clubs and extension agents in Blowing Rock and as

indicated in the DAMP, this can be achieved through entering into “partnerships with individuals and organizations to expand garden restoration...” (p.110).

- c. Consider the inclusion of one comfort station (or expansion of the existing one) at or near the Manor House. Any new construction could be done in a similar manner as the facility at Bass Lake (~cost of \$100,000). Any Alternative, besides the No Action Alternative, selected indicates that the result could be increased visitation and use of the site which could prompt the need for increased visitor amenities including a convenience station. If a new convenience station is not included in the modified preferred alternative, remove the language on page 60 that appears to preclude any new construction. Restrictive language could impede progress in the event that funding and needs align in such a way as to dictate the construction of a new facility.
- d. A final area for consideration is the removal of the concession from the Manor House. “The use of the Manor House as an arts and crafts center presents an adverse, moderate to major, long-term effect to this historic structure” (p.168). In fact, the Historic Structures Report (1996) and the Long Range Interpretive Plan (2002) both call for the removal of the craft store. The impacts of the Craft Guild on the Manor House present the only potentially major negative impact from Alternative One (p. 168). Whether considering the increased load to the electrical systems of lighting the merchandise (in a facility without a fire suppression system), or the more appropriate use of the facility as a much needed Visitor Center called for in two park plans, it seems that removal of the Craft Guild would produce the greatest benefit and remove the only major adverse impact of Alternative One. In addition, any increased cost of the proposed modifications to Alternative One could be mitigated by the reduction of the proposed \$100,000 cost estimate (Table 10, p. 104) of soliciting a new concession contract.
- e. Although the Foundation is not advocating for all of the elements within Alternative Two, it is helpful to examine the long-term benefits and adverse impacts of each proposed alternative. After analyzing the differences between the potential major long-term benefits and major long-term adverse impacts of each alternative found in the DAMP (not including those found identically in both alternatives), it is clear that Alternative Two results in the greatest number of long-term benefits with the least long-term adverse impacts. There are no potential major long-term benefits identified in Alternative One that are not also found in Alternative Two. On the other hand, there are four major long-term potential benefits outlined for Alternative Two, including the cultural landscape, historic structures, socio-economics, and the visitor use and experience (DAMP p.151-183). The major impact of Alternative Two would affect concession services with moderate (short-term) adverse impact to revenue for the current concessionaire (until they relocate). Conversely, leaving the Guild intact is the only potentially major adverse impact of Alternative One to Flat Top Manor.

In conclusion, this process has taken more than 15 years and hundreds of thousands of dollars. It has seen the comings and goings of multiple Superintendents, management team leaders, philosophies and district staff at the site. This Developed Area Management Plan will lay the groundwork and provide the guidelines for development at the Moses H. Cone Memorial Park for many years to come, over the tenures of many NPS staff to come and unknown budgetary ebbs and flows to come. As a result, we encourage the modification of the selected alternative as indicated above to ensure the greatest benefit for the environment, the visitor experience and the cultural landscape while removing the only potentially major adverse impact. We hope that decisions will not be made in this time of austerity that will have lasting impacts for those who follow us. We, at the Blue Ridge Parkway Foundation, believe that we will be successful in generating the revenue to support the completion of the projects outlined in the proposed modified alternative.

We are grateful for the hard work and dedication of the National Park Service in completing the DAMP and are excited by the opportunities that a modified alternative would present for the community, the park and the people who love Moses H. Cone Memorial Park today and those to come tomorrow. If you have any questions, please contact Carolyn Ward at 828-776-4547 cward@brpfoundation.org.

Sincerely,



Carolyn W. Ward, CEO
Blue Ridge Parkway Foundation



Broaddus Fitzpatrick, Chair
Board of Trustees



North Carolina
Department of Administration

Pat McCrory, Governor

Bill Daughtridge, Jr., Secretary

February 16, 2015

Ms. Suzette Molling
U.S. Department of the Interior
National Park Service, Blue Ridge Pkwy.
199 Hemphill Knob Road
Asheville, North Carolina 28803

Re: SCH File # 15-E-0000-0374; EA; Proposed DAMP/EA is for the Moses H. Cone Memorial Park.

Dear Ms. Molling:

The above referenced environmental impact information has been submitted to the State Clearinghouse under the provisions of the National Environmental Policy Act. According to G.S. 113A-10, when a state agency is required to prepare an environmental document under the provisions of federal law, the environmental document meets the provisions of the State Environmental Policy Act. Attached to this letter for your consideration are the comments made by agencies in the course of this review.

If any further environmental review documents are prepared for this project, they should be forwarded to this office for intergovernmental review.

Should you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink that reads "Crystal Best".

Crystal Best
State Environmental Review Clearinghouse

Attachments

cc: Region D

Mailing Address:
1301 Mail Service Center
Raleigh, NC 27699-1301

Telephone: (919)807-2425
Fax (919)733-9571
State Courier #51-01-00
e-mail state.clearinghouse@doa.nc.gov

Location Address:
116 West Jones Street
Raleigh, North Carolina

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North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

MEMORANDUM

TO: Crystal Best
State Clearinghouse

FROM: Lyn Hardison *LH*
Division of Environmental Assistance and Customer Service
Permit Assistance & Project Review Coordinator

RE: 15-0374
Environmental Assessment
Proposed DAMP/EA is for the Moses H. Cone Memorial Park
Watauga County

Date: February 9, 2015

The Department of Environment and Natural Resources has completed its review. Based on the information provided, several agencies have offered specific guidance to aid the applicant to minimize impacts to the natural resources, aquatic and terrestrial wildlife resources within the project site area. They have also provided a list of rare species that nest in and around the Park area. The Department encourages the applicant to continue to communicate with the agencies if any questions or concerns arise throughout the development of the proposed project. The comments are attached for the applicant's consideration.

The Department agencies will continue to be available to assist the applicant through the environmental review and permitting processes.

Thank you for the opportunity to respond.

Attachment

Attachment

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◆ North Carolina Wildlife Resources Commission ◆

Gordon Myers, Executive Director

MEMORANDUM

TO: Lyn Hardison, Environmental Coordinator
Office of Legislative and Intergovernmental Affairs
North Carolina Department of Environment and Natural Resources

FROM: Andrea Leslie, Mountain Region Coordinator *Andrea Leslie*
Habitat Conservation Program

DATE: February 2, 2015

SUBJECT: Environmental Assessment: Moses H. Cone Memorial Park Developed Area
Management Plan
OLIA No. 15-0374

Biologists with the North Carolina Wildlife Resources Commission (NCWRC) reviewed the Environmental Assessment (EA) for the Moses H. Cone Memorial Park Developed Area Management Plan on the Blue Ridge Parkway. Comments from the NCWRC on this are offered for your consideration under provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and the North Carolina Environmental Policy Act (G.S. 113A-1 et seq., as amended; 1 NCAC-25).

The EA discusses three alternatives—a no action alternative, Alternative 1, and Alternative 2. Alternative 1, the preferred alternative, is presented as an “Enhance What We Have” approach. It involves the development of limited new infrastructure to support the visitor’s experience, support of natural succession in a large proportion of the park, clearing of limited woodland patches, and management of Bass and Trout Lakes. Alternative 2 is presented as a “Cultural Landscape Rehabilitation”, involving the development of more extensive new infrastructure, extensive clearing of woodland to restore orchards, gardens, and recreational areas, and management of Bass and Trout Lakes.

Of the two action alternatives, NCWRC prefers Alternative 1, as it would retain more forested habitat and involve a smaller increase in impervious surface than Alternative 2.

Mailing Address: Division of Inland Fisheries • 1721 Mail Service Center • Raleigh, NC 27699-1721
Telephone: (919) 707-0220 • Fax: (919) 707-0028

The Manor House area is on a plateau that drains to headwater streams in the New and Catawba River basins. Increases in parking space at the Manor House are proposed in Alternatives 1 and 2 which will result in increased impervious cover and associated stormwater, which if unmanaged, can destabilize headwater streams, increase stream temperatures, and carry stormwater-driven pollutants to streams. NCWRC recommends that any increases in impervious surface be minimized.

The EA does not describe any stormwater management measures that would be used to reduce impacts of stormwater from this increased impervious surface. NCWRC recommends that Low Impact Development (LID) technology be used to manage stormwater from new parking lots. Using LID techniques such as reduced road widths, grassed swales instead of curb and gutter, rain gardens, and stormwater wetlands will not only help maintain the predevelopment hydrologic regime, but also reduce the temperature of released water in the summer months.

Both Alternatives 1 and 2 describe a plan to dredge Bass Lake in order to increase pond depths and remove water lilies. If the Park does dredge Bass Lake, NCWRC recommends dredging only part of the pond in order to maintain a diversity of habitats in this lake. Fish surveys completed by Blue Ridge Parkway and NCWRC staff in 2012 documented that Bass Lake contains Largemouth Bass and sunfish populations, both of which could support sustainable fisheries for these species (Hining and Rash, 2014). Water lilies provide nursery habitat and cover for adult fish present in this lake, and NCWRC recommends retaining some of this aquatic vegetation. In addition, there is a wetland on the northwest corner of Bass Lake that has the potential to serve as temporary habitat for Bog Turtles; we recommend avoiding this wetland in any dredging project.

According to Audubon North Carolina, there are three rare or state listed bird species that nest in the Moses Cone Memorial Park--Red Cross-bill [NC Special Concern (SC)], Brown Creeper (NC SC), and Yellow-bellied Sapsucker (NC Significantly Rare). In addition, there are a number of birds that occur in the Park (per Audubon NC) that are listed as priority species for conservation in the NC Wildlife Action Plan and/or are listed as conservation priorities in the Partners in Flight Bird Conservation Plan for the Southern Blue Ridge physiographic region. These are the Pine Siskin, Red-breasted Nuthatch, Blackburnian Warbler, Canada Warbler, Winter Wren, and Golden-crowned Kinglet.

NCWRC is concerned with impacts to a nesting population of Yellow-bellied Sapsuckers that occurs in the Park. Alternative 2 would result in greatest loss of habitat for sapsuckers including loss of nesting trees and drumming trees, and degradation of foraging habitat. Snags are particularly important to sapsuckers, and NCWRC would encourage retention of snags wherever possible. Furthermore, NCWRC would support an approach to management of natural resources that maintains sapsucker habitat.

Thank you for the opportunity to review and provide comments on this project. Please call me at (828) 400-4223 if you have any questions about these comments.

Reference:

Hining, K.J. and J.M. Rash. 2014. A Survey of Small Impoundments on the Blue Ridge Parkway, Watauga County, NC. NC Wildlife Resources Commission.

cc: Allen Ratzlaff, US Fish and Wildlife Service
Kevin Hining, Chris Kelly, and Lori Williams, NC Wildlife Resources Commission



North Carolina Department of Environment and Natural Resources
Office of Land and Water Stewardship

Pat McCrory
Governor

Bryan Gossage
Director

Donald R. van der Vaart
Secretary

February 2, 2015

TO: Lyn Hardison, NCDENR State Clearinghouse Coordinator

FROM: Allison (Schwarz) Weakley, North Carolina Natural Heritage Program *Allison Weakley*

SUBJECT: Environmental Assessment – DAMP/EA for Moses H. Cone Memorial Park, Watauga County, North Carolina

REFERENCE: Project No. 15-0374

Thank you for the opportunity to provide information from the North Carolina Natural Heritage Program (NCNHP) database for the proposed project referenced above. The NCNHP database show records for the following rare species within the Moses H. Cone Memorial Park:

SCIENTIFIC NAME	COMMON NAME	ELEMENT OCCURRENCE STATUS	ACCURACY	STATE STATUS	FEDERAL STATUS
<i>Accipiter striatus</i>	Sharp-shinned Hawk	Current	Low	SR	---
<i>Boyeria graflana</i>	Ocellated Darner	Current	Very High	SR	---
<i>Certhia americana</i>	Brown Creeper	Current	Low	SC	---
<i>Glyptemys muhlenbergii</i>	Bog Turtle	Current	Medium	T	T(S/A)
<i>Lilium grayi</i>	Gray's Lily	Current	Medium	T	FSC
<i>Neotoma magister</i>	Allegheny Woodrat	Current	Medium	SC	FSC
<i>Passerculus sandwichensis</i>	Savannah Sparrow	Current	Medium	SR	---
<i>Platanthera shriveri</i>	Shriver's Purple Fringed Orchid	Historical	Medium	SR-T	FSC
<i>Pohlia lescuriana</i>	Spherical Bulb Nodding Moss	Current	Low	SR-T	---
<i>Sphyrapicus varius</i>	Yellow-bellied Sapsucker	Current	High	SR	---

*For status and accuracy definitions, please see the Rare Species Status Definitions and Element Occurrences documents at <https://ncnhde.natureserve.org/consent/help>.

The NCNHP database also shows that there are two natural areas within Moses H. Cone Memorial Park: Moses Cone Park/Rich Mountain and Moses Cone Park/Flat Top Mountain. Additionally, there are records for the following high-quality natural communities within the Moses H. Cone Memorial Park: Acidic Cove Forest (Typic Subtype), Canada Hemlock Forest (Typic Subtype), Northern Hardwood Forest (Typic Subtype), and Rich Cove Forest (Montane Intermediate Subtype). To view the locations of the natural areas, please access our new Natural Heritage Data Explorer via the NCNHP website (www.ncnhp.org) under Data Services.

Feel free to contact me at 919-707-8629 or Allison.Weakley@ncdenr.gov if you have questions or need additional information.

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North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

Don van der Vaart
Secretary

MEMORANDUM

DATE: January 22, 2015

TO: Linda Culpepper, Division Director through Kathleen Lance

FROM: Deb Aja, Western District Supervisor - Solid Waste Section *DLA*

RE: NEPA Review - Project Number 15-0374, Watauga County, N.C.
U.S. Dept. of Interior Moses H. Cone Memorial Park
Developed Area Management Plan

The Solid Waste Section has reviewed the Environmental Assessment document for the U.S. Department of the Interior Moses H. Cone Memorial Park Developed Area Management Plan, Watauga County, North Carolina. The review has been completed and has seen no adverse impact on the surrounding community and likewise knows of no situations in the community, which would affect this project from a solid waste perspective as the plan is proposed.

Should there be any construction associated with the proposal, the U.S. Department of Interior should make every feasible effort to minimize the generation of waste, to recycle materials for which viable markets exist, and to use recycled products and materials in the development of this project where suitable. Any waste generated by this project that cannot be beneficially reused or recycled must be disposed of at a solid waste management facility approved to manage the respective waste type. The Section strongly recommends that any contractors are required to provide proof of proper disposal for all waste generated as part of the project. The nearest permitted facilities to the project are the Watauga County Transfer Facility and Watauga County Land Clearing and Inert Debris Landfill and Treatment and Processing Facility, Boone, Watauga County, North Carolina.

Questions regarding solid waste management should be directed to Deb Aja, Western District Supervisor, Specialist, Solid Waste Section, at (828)-296-4702.

Cc: Jason Watkins, Field Operations Branch Head
Dennis Shackelford, Eastern District Supervisor
Sarah Rice, Compliance Officer

2099 US Highway 70, Swannanoa, North Carolina 28778
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North Carolina Department of Environment and Natural Resources


Pat McCrory
Governor

Donald R. van der Vaart
Secretary

Date: January 30, 2015

To: Linda Culpepper, Director
Division of Waste Management

Through: Jim Bateson, Superfund Section Chief

From: Pete Doorn, Special Remediation Branch Head 

Subj: SEPA Project #15-0374, Proposed Moses H. Cone Memorial Park Development Area Management Plan, Watauga County, North Carolina

A review of the proximity of the Moses H. Cone Memorial Park Development Area Management Plan (DAMP) to CERCLIS and other sites under the jurisdiction of the Superfund Section has been completed. The proposed DAMP is the National Park Service's preferred option for future park management and includes the Memorial Park being managed as a "Learning Center" to promote public understanding and appreciation of the Cone Family, their estate, and the far-reaching influence they had regionally and nationally.

Two sites were identified within a 1-mile radius of the project as listed below and shown on the attached map. In considering future park development, the National Park Service should be aware that the park itself has environmental conditions associated with management of the former China, Flat Top, and Saw Mill Orchards. For reference, Superfund Section site files can be viewed at: <http://portal.ncdenr.org/web/wm/sf-file-records>

Please contact me at 919.707.8369 if you have any questions.

Site Name	ID #	Program	Est. Distance	Dir. from SEPA Proj.	Status
Moses H. Cone Memorial Park	NONCD0001095	PIHSB	0.0 mi	--	Site is an open case on the Inactive Hazardous Sites Inventory
Old John's River Road Dump	NONCD0001112	IHSB	0.8 mi	SW	Site is an open case on the Inactive Hazardous Sites Inventory

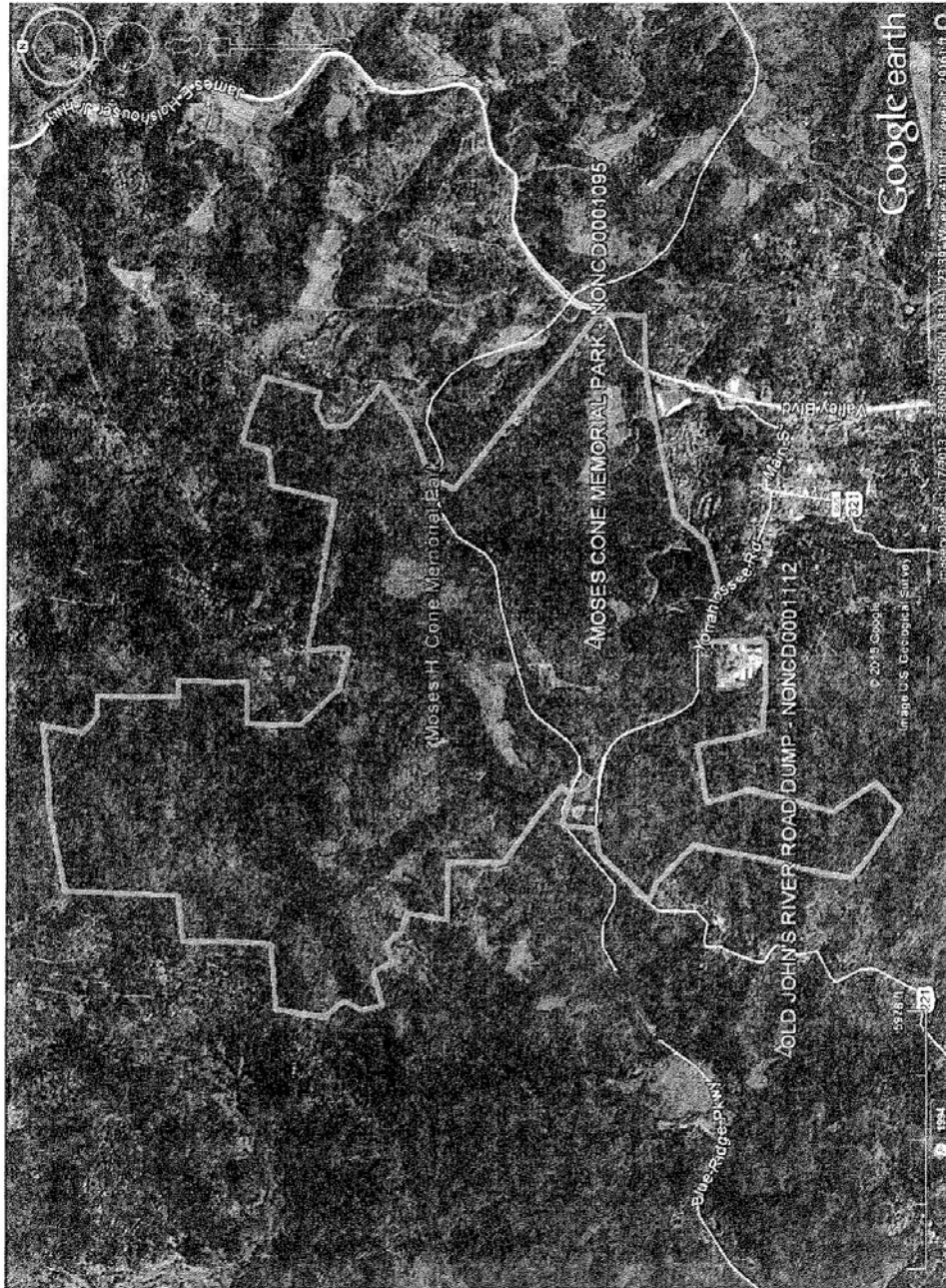
Cc: Jim Bateson

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Map 1: Superfund Sites Identified within 1-Mile Radius of SEPA Project #15-0374, Moses H. Cone Memorial Park Development Area Management Plan, Watauga County, North Carolina.

Note: Site locations are estimated based on the best available information.



State of North Carolina
Department of Environment and Natural Resources
INTERGOVERNMENTAL REVIEW - PROJECT COMMENTS

Reviewing Office: WSRO

Project Number 15-0374 Due Date: 2/2/2015
County Watauga

After review of this project it has been determined that the ENR permit(s) and/or approvals indicated may need to be obtained in order for this project to comply with North Carolina Law. Questions regarding these permits should be addressed to the Regional Office indicated on the reverse of the form. All applications, information and guidelines relative to these plans and permits are available from the same Regional Office.

	PERMITS	SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	Normal Process Time (statutory time limit)
<input type="checkbox"/>	Permit to construct & operate wastewater treatment facilities, sewer system extensions & sewer systems not discharging into state surface waters.	Application 90 days before begin construction or award of construction contracts. On-site inspection. Post-application technical conference usual.	30 days (90 days)
<input type="checkbox"/>	NPDES - permit to discharge into surface water and/or permit to operate and construct wastewater facilities discharging into state surface waters.	Application 180 days before begin activity. On-site inspection. Pre-application conference usual. Additionally, obtain permit to construct wastewater treatment facility-granted after NPDES. Reply time, 30 days after receipt of plans or issue of NPDES permit-whichever is later.	90-120 days (N/A)
<input type="checkbox"/>	Water Use Permit	Pre-application technical conference usually necessary	30 days (N/A)
<input type="checkbox"/>	Well Construction Permit	Complete application must be received and permit issued prior to the installation of a well.	7 days (15 days)
<input type="checkbox"/>	Dredge and Fill Permit	Application copy must be served on each adjacent riparian property owner. On-site inspection. Pre-application conference usual. Filling may require Easement to Fill from N.C. Department of Administration and Federal Dredge and Fill Permit.	55 days (90 days)
<input type="checkbox"/>	Permit to construct & operate Air Pollution Abatement facilities and/or Emission Sources as per 15 A NCAC (2Q.0100 thru 2Q.0300)	Application must be submitted and permit received prior to construction and operation of the source. If a permit is required in an area without local zoning, then there are additional requirements and timelines (2Q.0113).	90 days
<input type="checkbox"/>	Permit to construct & operate Transportation Facility as per 15 A NCAC (2D.0800, 2Q.0601)	Application must be submitted at least 90 days prior to construction or modification of the source.	90 days
<input type="checkbox"/>	Any open burning associated with subject proposal must be in compliance with 15 A NCAC 2D.1900	N/A	60 days (90 days)
<input type="checkbox"/>	Demolition or renovations of structures containing asbestos material must be in compliance with 15 A NCAC 20.1110 (a) (1) which requires notification and removal prior to demolition. Contact Asbestos Control Group 919-707-5950.		
<input type="checkbox"/>	Complex Source Permit required under 15 A NCAC 2D.0800		
<input type="checkbox"/>	The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land disturbing activity. An erosion & sedimentation control plan will be required if one or more acres to be disturbed. Plan filed with proper Regional Office (Land Quality Section) At least 30 days before beginning activity. A fee of \$65 for the first acre or any part of an acre. An express review option is available with additional fees.		20 days (30 days)
<input type="checkbox"/>	Sedimentation and erosion control must be addressed in accordance with NCDOT's approved program. Particular attention should be given to design and installation of appropriate perimeter sediment trapping devices as well as stable stormwater conveyances and outlets.		(30 days)
<input type="checkbox"/>	Mining Permit	On-site inspection usual. Surety bond filed with ENR Bond amount varies with type mine and number of acres of affected land. Any acre mined greater than one acre must be permitted. The appropriate bond must be received before the permit can be issued.	30 days (60 days)
<input type="checkbox"/>	North Carolina Burning permit	On-site inspection by N.C. Division Forest Resources if permit exceeds 4 days	1 day (N/A)
<input type="checkbox"/>	Special Ground Clearance Burning Permit - 22 counties in coastal N.C. with organic soils	On-site inspection by N.C. Division Forest Resources required "if more than five acres of ground clearing activities are involved. Inspections should be requested at least ten days before actual burn is planned."	1 day (N/A)
<input type="checkbox"/>	Oil Refining Facilities	N/A	90-120 days (N/A)
<input type="checkbox"/>	Dam Safety Permit	If permit required, application 60 days before begin construction. Applicant must hire N.C. qualified engineer to: prepare plans, inspect construction, certify construction is according to ENR approved plans. May also require permit under mosquito control program. And a 404 permit from Corps of Engineers. An inspection of site is necessary to verify Hazard Classification. A minimum fee of \$200.00 must accompany the application. An additional processing fee based on a percentage of the total project cost will be required upon completion.	30 days (60 days)

June 16, 2014

Project Number: <u>15-0374</u> Due Date: <u>2/2/2015</u>			Normal Process Time (statutory time limit)
PERMITS		SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	
<input type="checkbox"/>	Permit to drill exploratory oil or gas well	File surety bond of \$5,000 with ENR running to State of NC conditional that any well opened by drill operator shall, upon abandonment, be plugged according to ENR rules and regulations.	10 days N/A
<input type="checkbox"/>	Geophysical Exploration Permit	Application filed with ENR at least 10 days prior to issue of permit. Application by letter. No standard application form.	10 days N/A
<input type="checkbox"/>	State Lakes Construction Permit	Application fee based on structure size is charged. Must include descriptions & drawings of structure & proof of ownership of riparian property.	15-20 days N/A
<input type="checkbox"/>	401 Water Quality Certification	N/A	60 days (130 days)
<input type="checkbox"/>	CAMA Permit for MAJOR development	\$250.00 fee must accompany application	55 days (150 days)
<input type="checkbox"/>	CAMA Permit for MINOR development	\$50.00 fee must accompany application	22 days (25 days)
<input type="checkbox"/>	Several geodetic monuments are located in or near the project area. If any monument needs to be moved or destroyed, please notify: N.C. Geodetic Survey, Box 27687 Raleigh, NC 27611		
<input type="checkbox"/>	Abandonment of any wells, if required must be in accordance with Title 15A, Subchapter 2C.0100.		
<input type="checkbox"/>	Notification of the proper regional office is requested if "orphan" underground storage tanks (USTS) are discovered during any excavation operation.		
<input type="checkbox"/>	Compliance with 15A NCAC 2H 1000 (Coastal Stormwater Rules) is required.		45 days (N/A)
<input type="checkbox"/>	Tar Pamico or Neuse Riparian Buffer Rules required.		
<input checked="" type="checkbox"/>	Plans and specifications for the construction, expansion, or alteration of a public water system must be approved by the Division of Water Resources/Public Water Supply Section prior to the award of a contract or the initiation of construction as per 15A NCAC 18C .0300 et. seq. Plans and specifications should be submitted to 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. All public water supply systems must comply with state and federal drinking water monitoring requirements. For more information, contact the Public Water Supply Section, (919) 707-9100.		30 days
<input checked="" type="checkbox"/>	If existing water lines will be relocated during the construction, plans for the water line relocation must be submitted to the Division of Water Resources/Public Water Supply Section at 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. For more information, contact the Public Water Supply Section, (919) 707-9100.		30 days

Other comments (attach additional pages as necessary, being certain to cite comment authority)

Division	Initials	No comment	Comments	Date Review
DAQ		<input type="checkbox"/>		/ /
DWR-WQROS		<input type="checkbox"/>		/ /
(Aquifer & Surface)		<input type="checkbox"/>		/ /
DWR-PWS	EAH	<input type="checkbox"/>	see comments marked above	2/9/15
DEMLR (LQ & SW)		<input type="checkbox"/>		/ /
DWM - UST		<input type="checkbox"/>		/ /

REGIONAL OFFICES

Questions regarding these permits should be addressed to the Regional Office marked below.

☐ **Asheville Regional Office**
2090 US Highway 70
Swannanoa, NC 28778
(828) 296-4500

☐ **Mooresville Regional Office**
610 East Center Avenue, Suite 301
Mooresville, NC 28115
(704) 663-1699

☐ **Wilmington Regional Office**
127 Cardinal Drive Extension
Wilmington, NC 28405
(910) 796-7215

☐ **Fayetteville Regional Office**
225 North Green Street, Suite 714
Fayetteville, NC 28301-5043
(910) 433-3300

☐ **Raleigh Regional Office**
3800 Barrett Drive, Suite 101
Raleigh, NC 27609
(919) 791-4200

☐ **Winston-Salem Regional Office**
585 Woughtown Street
Winston-Salem, NC 27107
(336) 771-5000

☐ **Washington Regional Office**
943 Washington Square Mall
Washington, NC 27889
(252) 946-6481

June 16, 2014