

National Park Service
U.S. Department of the Interior

Blue Ridge Parkway
Virginia



ROANOKE VALLEY / BLUE RIDGE PARKWAY TRAIL PLAN

Finding of No Significant Impact
September 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:



Superintendent, Blue Ridge Parkway



Date

Approved:



Regional Director, Southeast Regional Office



Date

INTRODUCTION

The National Park Service (NPS) has prepared an Environmental Assessment (EA) that evaluates the proposed development of an integrated trail system that will provide critical linkages between the Roanoke Valley Greenways trail network and the Blue Ridge Parkway (Parkway). This trail system will provide the public with a greatly enhanced range of trail opportunities as well as provide the Parkway with rehabilitation and general maintenance assistance from the Roanoke Valley Greenway Commission (Commission) and associated trail groups.

The Blue Ridge Parkway trails in the Roanoke area were planned with the original design of the Parkway. The trails were intended to follow the Parkway motor road from Stewart's Knob at MP 110.6 to State Route 220 at MP 121.4. The Chestnut Ridge Trail loop surrounding the Roanoke Mountain Campground was added to complete the trail system with the construction of the campground a few years later. Both equestrian and hikers have shared the trail systems since its construction.

In addition to hiking and horseback riding, mountain biking is another rapidly growing outdoor recreation activity in the Roanoke valley. Other challenges include upgrading the existing Blue Ridge Parkway trail system to a sustainable design, rerouting several sections that have become washed out and gullied, controlling user access, accommodating greenway connections, and developing a strategy to address long-term management and maintenance needs.

In 1995, the Roanoke Valley Greenways/Open Space Steering Committee was established to spearhead efforts in the development of a regional greenway system. Coordinated by the Fifth Planning District Commission, and consisting of Roanoke County, the Cities of Roanoke and Salem and the Town of Vinton, the committee went to work at facilitating the efforts of numerous citizens, interest groups and public and private entities in the development of a Roanoke Valley Conceptual Greenway Plan (RVCGP). Adopted in 1997, the plan is providing a framework for the development of an interconnected network of trails and greenway corridors throughout the Roanoke region. In 1997 the Roanoke Valley Greenways Commission was established to oversee implementation of the plan.

The Roanoke Valley CGP has identified 35 specific greenway segments, radiating outward from the urban core of Roanoke, Salem and Vinton, Virginia. In order to realize the Roanoke Greenway vision, the Commission works continuously to explore potential trail linkages, as well as potential new partnerships to complete these segments. Over the past few years attention has been given to the areas south and east of the urban core. In this part of the region, the urban area abuts the Blue Ridge Mountain. Located on the ridge crest is the Blue Ridge Parkway, which is one of the 35 routes in the plan.

The Roanoke Valley Greenways Commission and Blue Ridge Parkway signed a General Agreement in 2001 allowing the Commission to assist with trail planning, mapping and rehabilitation under the direction of Parkway staff. Ensuing discussions followed to explore options for development of an integrated system that would provide a valley-wide trail system connecting to the Parkway.

A planning team was established to determine the feasibility of developing a shared-use trail network, linking Blue Ridge Parkway and the Roanoke Valley trail network. The Parkway is committed to continuing the partnership with the Commission and implementing an adaptive management approach of these trail resources, with the following project goal:

To expand outdoor recreational opportunities for both residents and visitors to the Roanoke region by providing a network of shared use trails that link downtown Roanoke and surrounding neighborhoods to locally and national significant open space resources.

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 August 8, 2011, for a 36-day agency review and public comment period.

PREFERRED / SELECTED ALTERNATIVE

Bicycle use, Equestrian Use, and Trail Use in the national park system is governed specifically by the following regulation and policy:

Code of Federal Regulations (CFR), Title 36, Volume 1, Part 4, Sec 4.3 (a), states, in part:

The use of a bicycle is prohibited except on park roads, in parking areas and on routes designated for bicycle use; provided, however, the superintendent may close any park road or parking area to bicycle use pursuant to the criteria and procedures of Sections 1.5 and 1.7 of this chapter. Routes may only be designated for bicycle use based on a written determination that such use is consistent with the protection of a park area's natural, scenic and aesthetic values, safety considerations and management objectives and will not disturb wildlife or park resources.

NPS Management Policies 2006, Section 9.2.2.4 Bicycle Trails, quotes CFR language and states:

The designation of bicycle routes is allowed in developed areas and in special use zones based on a written determination that such use is (1) consistent with the protection of a park's natural, cultural, scenic, and esthetic values; (2) consistent with safety considerations; (3) consistent with management objectives; and (4) will not disturb wildlife or other park resources. A similar determination may be made to designate routes outside developed areas and special use zones; however, the designation must be made by promulgating a special regulation.

NPS Management Policies 2006, Section 9.2.2 Trails and Walks, states that trails and walks will serve as management tools to help control the distribution and intensity of use. All trails and walks would be carefully situated, designed, and managed to:

- 1) *reduce conflicts with automobiles and incompatible uses;*
- 2) *allow for a satisfying park experience;*
- 3) *allow accessibility by the greatest number of people; and*
- 4) *protect park resources.*

Section 9.2.2 further states:

In addition, trail planning will take into account NPS interest in cooperating with Federal, State, local, and tribal governments, as well as individuals and organizations, to advance the goal of a seamless network of parks. These partnership activities are intended to establish corridors that link together, both physically and with a common sense of purpose, open spaces such as those found in parks, other protected areas, and compatibly managed private lands.

Section 9.2.2.4 Equestrian Trails, states, in part:

Equestrian trails and related support facilities, such as feed boxes and hitch rails, may be provided when they are consistent with park objectives and when site conditions are suitable. Horse camps should be designed with user interest in mind and consistency with NPS policy. Photovoltaic systems should be evaluated to power any necessary water systems. Ramps for mounting the animals must be provided for persons with disabilities.

After review of the alternatives and consideration of comments received from the public, various agencies, and interested stakeholders, the NPS has identified Alternative C (Expand Trail System with Connections and Mountain Biking), as the selected alternative (selected alternative). Alternative C was the preferred alternative in the EA. Under the selected alternative, the NPS will construct a separate mountain biking and pedestrian trail system at the Roanoke River Parkway. The vast majority of the mountain bike trails that are proposed to be constructed at Explore Park are on land held in easement by three parties: the Blue Ridge Parkway, Roanoke County, and Roanoke Valley Resource Authority – the fee owner of the property. To complete the connection to Explore Park will require approximately 0.25 miles of bicycle trail on NPS land near Mayflower Overlook. In addition, approximately 42 unauthorized trails totaling 4.1 miles within the greater Roanoke area Parkway lands from MP 110.6 to 126.2, Section 1-M, will be eliminated. The Parkway will pursue a bicycle regulation prior to any bike use occurring on park trails, following the regulations outlined in 36 CFR Part 4.30(e).

Some of the methods which might be used to eliminate unauthorized trails under the selected alternative are described below. NPS boundaries will be marked at trail access points. Exceptions to closure are specifically described in the alternatives section of the EA and the implementation maps (Appendix A); these trails will be brought up to NPS standards and designated and maintained as official trails.

Methods of Unauthorized Trail Elimination:

- Brushing the trail in
- Possibly felling hazard trees across the trail
- Revegetation and/or recontouring
- Signage and fencing at some locations

Additional Elements

The following additional elements are part of the selected alternative. (They are also part of the preferred alternative in the EA.)

Designation of Roanoke River Parkway Trails

During the planning of the Roanoke River Parkway, which was constructed to provide a vehicular connection between the Blue Ridge Parkway and Explore Park, 3.50 miles of trails, road crossings and parking areas were designed to be constructed on easement and fee simple lands. Under the selected alternative, construction of these trails will provide mountain bike and pedestrian trails and future linkages between the Roanoke River Greenway and the Parkway motor road. Providing separate facilities for mountain biking and not mixing user groups (bikes and horses) at the Chestnut Ridge Loop Trail will limit user conflicts.

The Blue Ridge Parkway has adopted standards for trail construction and public access points to the park's authorized trail system. The following standards will apply to the selected alternative:

Criteria for Trails

- Located to assure minimal impacts to natural resources (i.e. avoid switchbacks and wetlands).
- Limit access to the Blue Ridge Parkway trail system to trails from the Roanoke Valley Greenway system, and/or other public owned lands or right-of-ways (ROW).
- Constructed to sustainable NPS trail standards.
- Ability to maintain and manage.
- Use appropriate to Blue Ridge Parkway and NPS policies.
- Positive user group interaction.

Criteria for Access Points

- Safe - with adequate signage, signed road crossings, and good visibility between users and motorists.
- Inconspicuous - located where users will be visible but trail will not be readily visible to the Parkway motorist.
- Stabilized - well designed and maintained with no unacceptable impacts to resources.
- Connections only to public right-of-ways or parks (i.e. state or city maintained roads).
- Available for use by the general public.

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.

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, 17.4 miles of existing trail would remain for pedestrian and horse use. There would be no new trails constructed. There would be no connections between the Roanoke Greenway systems and Blue Ridge Parkway motor road or Parkway trails. No bicycle access would be allowed from the Roanoke Greenway system across park lands.

In addition, unauthorized trails within the greater Roanoke area Parkway lands from MP 110.6 to 126.2, Section 1-M, would be eliminated. NPS boundaries would be marked at trail access points. Exceptions to closure are specifically described in the alternatives section of the EA and the implementation maps; these trails would be brought up to NPS standards and designated and maintained as official trails.

Alternative B (Expanded Trail Systems with Connections)

Under Alternative B, current and future trail needs along the Roanoke Valley section of the Parkway (MP 110.6 to 126.2) would be addressed in a comprehensive manner. The existing 17.4 miles of park trails would be brought up to NPS standards utilizing volunteer and outside funding sources. Some abandoned trails on park land would be reestablished; in some locations, multiple social trails would be consolidated and unneeded trails would be eliminated. New loop and connector trails would be constructed at several locations. New bicycle and pedestrian accesses and parking areas would be established at various locations to provide safe access to motor road and trails. New trailhead parking for hikers and horseback users would be provided at various locations. Several connections between Parkway trails and Roanoke Valley Greenways trail system would be authorized. All new construction (estimated at 6.25 miles) would be done by Roanoke Valley Greenways volunteers or with grant or private funding sources.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The CEQ provides direction that the environmentally preferable alternative is “the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources.” (Q6a) (516 DM 6 4.10(A)(5))

Subsequently, Alternative B is the environmentally preferred alternative as it more adequately resolves visitor use patterns against current conditions while providing the least damage to the biological and physical environment. In addition, the risk to health and safety is reduced by not allowing mountain biking.

The no action alternative does not adequately resolve the continued need for authorized trail connections to and from the Parkway trail system, or connections between park lands and the greenway trail system, or the need to stabilize and reestablish existing and abandoned trails.

Alternative C, like Alternative B, would resolve all issues but also add mountain bike use which might adversely impact park operations and public health and safety.

MITIGATION

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

Natural Resources

Soils and Geology

- Existing pedestrian trails, subject to compaction, erosion and muddiness, will be properly maintained by volunteer groups under a Memorandum of Agreement (MOA) according to NPS standards.
- Horse trails will be maintained to NPS standards by horse riding clubs under a MOA.
- If trails are not properly managed and maintained by volunteer groups to NPS standards, the NPS will 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.
- Any land-disturbing activities equal to or greater than 10,000 square feet shall comply with the Virginia Erosion and Sediment Control Law and Regulations and Virginia Stormwater Management Law and Regulations. The NPS shall prepare and implement an erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan will be submitted to the Department of Conservation and Recreation, Christiansburg Regional Office.

Water Resources

- Construction of new trails in and around the Roanoke River OL, the entrance to Explore Park (MP 115 –116), and on Roanoke River Parkway lands will be completed after consultation with the Roanoke Valley Resource Authority (RVRA) to assure that monitoring equipment is not disturbed, that any “caps” that might occur on the landfill will not be compromised by trail activity, and that contaminants known to occur in the area will not be exposed during construction, use, or maintenance of the trail.
- Stream crossings will be constructed and sized so as not to obstruct natural flow of water.
- Construction of stream crossings might require Section 404 USACE permits and the park will obtain all necessary permits before any construction activities began.
- For land-disturbing activities equal to or greater than 1 acre, the NPS will register for coverage under the General Permit for Discharges of Stormwater from Construction

Activities and develop a project specific stormwater pollution prevention plan in accordance with the Virginia Stormwater Management Program Permit Regulations.

Vegetation/Wildlife

- Throughout the life of the trail, 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 might include, but will not be limited to, aesthetic concerns or increased fire fuels loading. This decision will be made by NPS personnel.

Threatened and Endangered Species

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

- The NPS shall coordinate with the U. S. Fish and Wildlife Service and the Virginia Department of Game and Inland Fisheries to ensure compliance with protected species legislation.
- If it is determined that the federally listed northern long-eared bat (NLEB) is in the project area, park staff will cut trees outside of the period when young bats are unable to fly.

Cultural Resources

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

Archeological Resources

In order to mitigate any adverse impacts to cultural resources and comply with Section 106 of the NHPA, the NPS negotiated a programmatic agreement (PA) with the Virginia State Historic Preservation Officer (SHPO). The PA recorded the terms and conditions agreed upon to resolve and mitigate the potential adverse effects associated with the proposed action and is presented in **Appendix B**.

When specific locations for trail work have been determined, the NPS will fulfill compliance requirements for each site-specific trail. Examples of these additional requirements might include:

- If previously unknown archeological resources were discovered in existing trails, areas of minor rerouting and/or areas of minor rehabilitation, the trail will be closed and use will be halted until the resources are identified, documented, and an appropriate mitigation strategy developed. All work will be carried out in accordance with pertinent laws and regulations, including the stipulations of the 2010 Programmatic Agreement entered into by the Blue Ridge Parkway, the Advisory Council on Historic Preservation, the Virginia State Historic Preservation Office, and the affected American Indian Tribes.
- If the BLRI determined in consultation with the SHPO that further efforts are needed to identify archeological sites, the BLRI will develop an archeological testing program of sufficient intensity to support evaluation of the sites' eligibility for listing in the National Register of Historic Places, following the regulations outlined in 36 CFR Part 800.4(c).
- If as a result of the testing program, archeological sites are identified that are eligible for the NRHP, the BLRI will develop a plan for each site for the avoidance and protection

of, or for recovery of information, or destruction without data recovery. The plan will be submitted to the SHPO for review and approval prior to implementation of the plan.

- All data recovery plans prepared under the terms of the 2010 PA will include the following elements:
 - Information including site maps, boundaries, nature, and time period of the archeological property or properties where data recovery will be carried out, and the context in which such properties will be eligible for the National Register.
 - Information on any property, properties, or portions of properties that will be destroyed without data recovery and the context in which such properties will be eligible for the National Register.
 - Discussion of the research questions to be addressed through the data recovery with an explanation/ justification of their relevance and importance.
 - Description of the recovery methods to be used, with an explanation of their pertinence to the research questions.
 - Information on any regular progress reports or meetings to keep the NPS and the SHPO up to date on the course of the work. The plan will contain the expected timetable for excavation, analysis and preparation of the final report.
- Existing trail segments will be surveyed for archeological resources, as funding becomes available.
- Consistent with the provisions of the 2008 PA among the NPS, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, the BLRI will prepare assessments of effect for the actions in consultation with the appropriate cultural resource advisors in the fields of archeology, history, historic landscape architecture, and historic architecture who meet the professional qualifications set forth in the Secretary of the Interior's, "*Standards and Guidelines for Archeology and Historic Preservation*."
- Actions that meet the criteria for streamlined review as specified in Stipulation III.C of the 2008 PA will require no further review by the SHPO. For those actions that will not meet the criteria for streamlined review, the BLRI will submit the assessment of affect and all necessary supporting documentation to the SHPO for review and comment.

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 to be adversely impacted by the implementation of the trail plan, i.e., overcrowding, accidents or incidents related to increased visitor use, recurring complaints about noise and/or crowding, or other adverse impacts, adaptive management strategies will be implemented based upon the severity of the impact. These strategies will range from those associated with lesser impacts, such as increased educational campaigns aimed at making visitors more aware of use issues and impacts to increased enforcement which will ensure compliance with use regulations. For more severe impacts, adaptive management strategies might include

selective or limited use of a particular area through permitting, separation of horse and mountain bike uses, or closure of an area if health and safety hazards are occurring.

Human Health and Safety

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

- Trails, trail connections and road crossings will be designed so that medical and law enforcement personnel have adequate access to the trail system in the event that they must respond to a health or safety concern. The Parkway does not currently, and does not anticipate in the future, having capability to provide emergency services beyond Level I response; the Parkway relies upon local jurisdictions to carry out rescue and medical emergency response. All trail plan implementation decisions will be made in conjunction with partner emergency service providers based upon thorough consideration of potential human health and safety concerns.
- Safety at road crossings will be improved with the implementation of the trail plan; mitigation as described above. If visitor safety were to be adversely impacted by the implementation of the trail plan, adaptive management strategies will be used to identify appropriate solutions and address those impacts.

Solid Waste Materials

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

- All solid waste, hazardous waste and hazardous materials will be managed in accordance with all applicable federal, state and local environmental regulations.
- Any soil that is suspected of contamination or wastes that are generated during construction-related activities will be tested and disposed of in accordance with applicable federal, state and local laws and regulations.

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 new trails and other new construction will be identified beyond the park ONPS funds. Partnerships and donated funds will be identified to assist in completion of new construction projects and offset impacts to park operations.

Transportation Systems

- Coordination with Virginia Department of Transportation regarding potential impacts to the transportation system shall occur prior to implementation of the project.

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 and geology, water resources, including wetlands, vegetation, wildlife, archeological resources, socioeconomics, visitor use and experience, including recreational and visual resources, human health and safety, and park operations. 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 the Affected Environment/Environmental Consequences section of the EA.

The preferred alternative will provide the greatest protection of soil and geological features with the introduction of user groups providing trail maintenance on a routine basis, as needs arise. Some additional ground exposure might occur with the introduction of mountain bikes on Roanoke River Parkway, but this impact will be minor for the long-term. Unauthorized trails will be eliminated, reducing erosion potential, or rehabilitated to meet NPS standards and will become part of the total trail system. This will have a moderate, long-term positive impact on soil loss.

Degradation of water resources will be minimized as trails will be adequately maintained by user groups through MOA, thus reducing the amount of erosion that could reach streams and creeks. Construction of additional mountain bike trails will be to strict specifications limiting cut and fill slopes and will meet RVRC approved standards and guidelines. Adverse impacts to water resources will be negligible for the long-term under the selected alternative.

The construction of 3.5 miles of mountain bike trails adjacent to the Roanoke River Parkway will not significantly add to the loss of vegetation for the site which is immature trees and agricultural fields. Construction will provide the opportunity to reduce evasive species infiltration. Thus, adverse impacts to vegetation under the selected alternative will be negligible to minor for the long-term and beneficial impacts will be minor in the short-term.

Under the selected alternative, management of the trail system vegetation may include forest and open fields increasing habitat diversity, providing long-term, negligible to minor beneficial impacts to wildlife. There will be long-term, beneficial impacts for salamanders as trees will be left along the trail corridor.

Adverse effects to archeological resources under the selected alternative will be negligible for the short- and long-term since Phase I investigations will be undertaken before new trails sections or parking are constructed, and before additional use will be permitted.

Under the selected alternative, the development of new trails, reestablishment of abandoned trails, new greenway connections, additional visitor parking, improved horse facilities, bike access to the

motor road and the introduction of mountain biking will provide quality of life benefits to local residents and increases in tourism, as well as potential business and economic opportunities related to trail use. These impacts will be long-term and beneficial.

Actions under the selected alternative, i.e., development of new trails, reestablishment of abandoned trails, new greenway connections, additional visitor parking, improved horse facilities, bike access to the motor road and the introduction of mountain biking might provide long-term, beneficial impacts to visitor use and experience. There might also be a potential short to long-term, beneficial impact from the addition of mountain biking to Roanoke River Parkway Trails.

Expanding the trail system, introducing a new use, and providing connections and access to and over the motor road might result in more accidents/incidents or at the least a need for more enforcement, monitoring and additional safety and outreach activities. Working with volunteer groups will necessitate increased time in training, oversight and coordination. New facilities will increase lifecycle maintenance costs. Implementation, given existing staffing levels assumed for the foreseeable future, might cause long-term, minor to moderate and adverse impacts to district and park-wide operations under the selected alternative.

Degree of effect on public health and safety.

The NPS selected alternative will have a beneficial impact on overall public health and safety due to improvements to trail system and existing crossings. However, increased use and creation of more access to and across the motor road for users might result in long-term, minor to moderate, adverse impacts on health and safety as the likelihood of accidents/incidents increases. The addition of a new use-mountain bicycling-might have the potential to increase incidents/accidents as there will be more users, users travelling at different rates of speed, and all users learning to adjust to new trail use and conditions. Increased potential for accidents/incidents will result in short to long-term, minor to moderate, adverse impacts on health and safety. These impacts will be mitigated through enforcement and educational activities or use restrictions.

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 historic or cultural resources, prime farmlands, wetlands, or wild and scenic areas that will be affected by implementation of the preferred alternative. In addition, the project area is not considered to be biologically significant.

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

Department of the Interior regulations implementing NEPA provide that the term “controversial” refers to “circumstances where a substantial dispute exists as to the environmental consequences of the proposed action and does not refer to the existence of opposition to a proposed action, the effect of which is relatively undisputed.” 46 CFR § 46.30.

During the public review period, 1,054 comments were received from interested parties. Two-hundred eighty-two comments pointed out that they were in favor of multi-use trails, 231 comments addressed unauthorized social trails, 173 comments agreed with using volunteers, 32 comments opposed bikes on trails, 10 were in favor of Alternative C, and three were in favor of Alternative B. Many comments expressed establishing a one-year pilot project to evaluate shared trail use. Comments included recommendations for mitigation and some concerns were expressed about impacts on the local /regional economy if biking was not allowed on the trails. Therefore, the effects from the selected alternative are not likely to be highly controversial within the meaning of applicable regulations.

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

Assuming that NPS has the resources to implement the actions called for in the selected alternative, possible effects of the selected alternative should be straightforward and not involve unique or unknown risks. Therefore, the NPS has determined that with respect to the selected alternative, the extent and degree of uncertainty regarding impacts or unique or unknown risks is not significant.

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 and geology, water resources, vegetation, wildlife, archeological resources, socioeconomics, visitor use and experience, human health and safety, and park operations 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.

Under Section 110 of the NHPA, the NPS, as a Federal land-holding agency, is required to identify, inventory, and nominate properties to the National Register of Historic Places, and to exercise caution to protect such properties (16 U.S.C. § 470). Section 106 of the NHPA requires the agency to consider the effects of its actions on National Register-listed or eligible properties.

As discussed in the EA, there are no historic structures or cultural landscapes that will be affected by implementation of the selected alternative. Adverse effects to archeological resources will be negligible for the short-and long-term since Phase I investigations will be undertaken before new trail sections or parking areas are constructed and before additional use will be permitted. The archeological survey of existing trail segments will have minor to moderate, long-term, beneficial, impacts since the location of these sites will be known and park staff can monitor the conditions of these resources. When specific locations for trail work have been determined, the NPS will fulfill compliance requirements for each site-specific trail per the November 10, 2010 Programmatic Agreement with the Virginia State Historic Preservation Officer (Appendix B).

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

The USFWS, the VDGIF, the VMRC, and the DCR Division of Natural Heritage 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 northern long-eared bat (*Myotis septentrionalis*), which was not federally listed as an endangered species at the time the EA was prepared, is now a listed species. NLEB have not been seen in the Roanoke area, but there is evidence of them to the north and south on the Parkway. NLEB should not be jeopardized from activities under the selected alternative as mitigations will be in place to negate adverse impacts. Park staff will consult with the U.S. Fish and Wildlife Service before any tree cutting activities occur, but as discussed above, the NPS has determined that there should be no significant impacts to these species.

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

The selected alternative does not threaten a violation of any Federal, State, or local law or requirement imposed for the protection of the environment.

PUBLIC INVOLVEMENT

The NPS conducted public scoping for the proposed action between October 2007 and December 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, 364 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 Roanoke Valley/BLRI trail plan. Public scoping comments

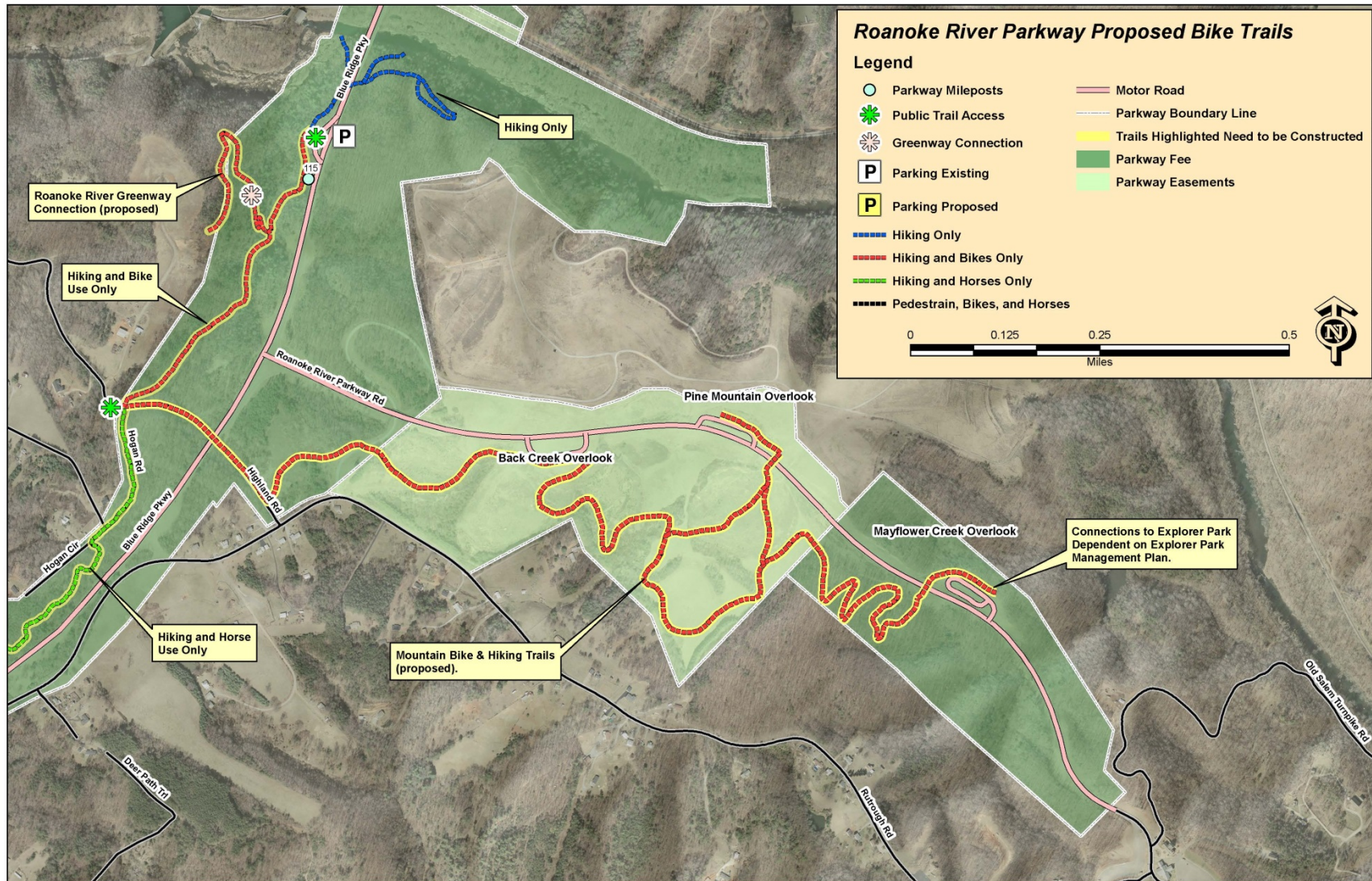
and issues raised by NPS staff provided input used in the alternative development process and in the analysis presented in the document.

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 August 8, 2011, and closed September 12, 2011. 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 a public meeting held at the Explore Park visitor Center in Roanoke, Virginia, on September 1, 2011.

There were 1,054 comments received during this review period, of which three were substantive. A summary of comments are included in Appendix D. A variety of views were expressed by commenters, ranging from support for multi-use trails, to qualified support for the selected alternative (the NPS preferred alternative), to suggestions that NPS establish a greenway connection to the Roanoke River Greenway in addition to the selected alternative. The majority of comments were from individual citizens, but comments were also submitted by organizations and government agencies. Letters from the VADEQ, the VADGIF, the VADCR, VDH, and the VAMRC are attached in Appendix E.

Substantive comments consisted of questions about or challenges to the selected alternative and suggestions for improving the cooperative relationship with local agencies. Responses to substantive comments are found in Appendix F.

APPENDIX A Implementation Map



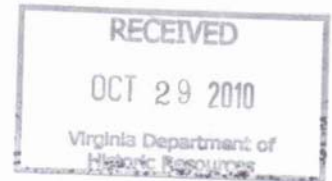
APPENDIX B
Programmatic Agreement between the NPS and the VA SHPO

**PROGRAMMATIC AGREEMENT BETWEEN THE NATIONAL PARK SERVICE AND THE
VIRGINIA STATE HISTORIC PRESERVATION OFFICE**

FOR

ROANOKE VALLEY / BLUE RIDGE PARKWAY TRAIL PLAN

October 2010



WHEREAS the Blue Ridge Parkway (BLRI) (P.L. 74-848) is a unit of the National Park Service (NPS) and is charged to meet the directives of the NPS Organic Act of 1916 (P.L. 64-235, 39 Stat. 535) to "conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations,"; and

WHEREAS the BLRI is also charged to meet the directives as a recreational motor road connecting Shenandoah and Great Smoky Mountains National Parks, specifically: "to conserve, interpret, and exhibit the unique natural and cultural resources of the central and southern Appalachian Mountains, as well as provide for leisure motor travel through a variety of environments", approved by an Act of Congress on August 25, 1916 (39 Stat. 535); and

WHEREAS the Roanoke Valley Greenways Commission and BLRI signed a General Agreement in 2001 allowing the Commission to assist with trail planning, mapping and rehabilitation under the direction of Parkway staff; and

WHEREAS a planning team was established to determine the feasibility of developing a shared-use trail network, linking BLRI and the Roanoke Valley trail network with the project goal specifically: to expand outdoor recreational opportunities for both residents and visitors to the Roanoke region by providing a network of shared use trails that link downtown Roanoke and surrounding neighborhoods to locally and national significant open space resources; and

WHEREAS the proposed BLRI trails in the Roanoke area were part of the original design of the Parkway, and were intended to follow the Parkway motor road from Stewart's Knob at MP 110.6 to State Route 220 at MP 121.4 with the addition of the Chestnut Ridge Trail loop surrounding the Roanoke Mountain Campground added to complete the trail system when the campground was constructed a few years later; and

WHEREAS in accordance with 36 CFR Part 800.4, the BLRI proposes to phase implementation of trail construction by implementing these actions over a period of one to two years depending upon funding and other factors; and

WHEREAS, the Park Superintendent is the responsible agency official for purposes of compliance with Section 106 of the NHPA as defined in 36 CFR 800.2 and is accountable for full performance of Section 106 compliance through the NPS Management Policies, and procedures for performance and program evaluation; and

WHEREAS the BLRI has determined that these undertakings may have an effect upon properties included in or eligible for inclusion in the National Register of Historic Places (NRHP) and has consulted with the

Virginia State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800. 14(a) of the regulations implementing Section 106 of the National Historic Preservation Act (NHPA; 16 U.S.C. 470); and

WHEREAS, the BLRI has invited the participation of the Advisory Council on Historic Preservation (ACHP) in this consultation, and the ACHP has declined to participate; and

WHEREAS, the BLRI has invited the participation of the Tuscarora Nation, Eastern Shawnee Tribe of Oklahoma, Absentee Tribe of Oklahoma, Catawba Indian Nation, United Keetoowah Band of Cherokee Indians, Cherokee Nation, Eastern Band of Cherokee Indians, and the Shawnee Tribe in this consultation and none of the Tribes chose to participate; and

WHEREAS the 2008 Programmatic Agreement (2008 PA) executed by the NPS, the ACHP, and The National Conference of State Historic Preservation Officers (NCSHPO) encourages the development of park and project specific programmatic agreements that may be independent of or supplemental to the 2008 Programmatic Agreement.

NOW, THEREFORE, the BLRI and the SHPO agree to proceed with the undertaking provided that the BLRI shall ensure that the following stipulations are implemented and that these stipulations shall govern the Project and all of its parts as long as this agreement remains in force.

Stipulations

The BLRI will ensure that the following measures are carried out:

I. Consultation

BLRI shall consult with the SHPO in carrying out the terms of this agreement. Such consultation may include but not be limited to:

Written correspondence

Conference calls

Face-to-face meetings

Field visits.

II. Planning and Compliance Preparation

A. BLRI

1. Consistent with the provisions of the 2008 PA, the BLRI will prepare assessments of effect for the actions in consultation with the appropriate cultural resource advisors in the fields of archeology, history, historic landscape architecture, and historic architecture who meet the professional qualifications set forth in the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation.

2. Actions that meet the criteria for streamlined review as specified in Stipulation III.C of the 2008 PA will require no further review by the SHPO. For actions that do not meet the criteria for streamlined review, the BLRI will submit the assessment of affect and all necessary supporting documentation to the SHPO for review and comment.

B. Identification, Evaluation and Treatment of Archaeological Sites

1. If the BLRI determines in consultation with the SHPO that further efforts are needed to identify archeological sites, the BLRI shall develop an archeological testing program in consultation with the SHPO of sufficient intensity to support evaluation of the sites' eligibility for listing in the National Register of Historic Places following the regulations outlined in 36 CFR Part 800.4(c).
2. If as a result of the testing program, archeological sites are identified that are eligible for the NRHP, the BLRI shall in consultation with the SHPO develop a plan for each site for the avoidance and protection or for recovery of information or destruction without data recovery. The plan shall be submitted to the SHPO for review and approval prior to implementation of the plan.
3. All data recovery plans prepared under the terms of this PA shall include the following elements:
 - a) Information including; site maps, boundaries, nature, and time period of the archeological property or properties where data recovery is to be carried out, and the context in which such properties are eligible for the National Register;
 - b) Information on any property, properties, or portions of properties that will be destroyed without data recovery and the context in which such properties are eligible for the National Register;
 - c) Discussion of the research questions to be addressed through the data recovery with an explanation/ justification of their relevance and importance;
 - d) Description of the recovery methods to be used, with an explanation of their pertinence to the research questions;
 - e) Information on any regular progress reports or meetings to keep the NPS and the SHPO up to date on the course of the work. The plan should contain the expected timetable for excavation, analysis and preparation of the final report.

C. Review of Documentation

The BLRI shall submit two copies of the draft of all technical reports bound in a spiral binding and on acid free paper to the SHPO for review and comment. The BLRI shall ensure that all comments received within thirty (30) days of report receipt shall be addressed in the final technical reports. Two copies of all final technical reports and one electronic copy in Adobe® Portable Document Format (.pdf) shall be provided to the SHPO.

D. Curation

Curation of all archeological materials and appropriate field and research notes, maps, drawings and photographic records collected as part of this PA will be cared for in accordance with the requirements of 36 CFR Part 79, *Curation of Federally Owned and Administered Archeological Collections* and the *National Park Service Museum Handbook*.

E. Professional Qualifications

All archeological work will be conducted by or under the direct supervision of a qualified archeologist who meets, at a minimum, the qualifications set forth in the Secretary of the Interior's *Professional Qualifications Standards* (48 FR 44738-9).

F. Reporting Standard

All archeological studies, resulting from this PA, including data recovery plans, shall be consistent with the *Secretary of the Interior's Standards and Guidelines for Archeological Documentation* (48 FR 4434-37), the Director's Order 28, Technical Guidelines, and the SHPO's *Guidelines for Conducting Cultural Resource Survey in Virginia: Additional Guidance for the Implementation of the Federal Standards Entitled Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines* (48 FR 44742, September 29, 1983) rev. 2003, and shall take into account the ACHP's *Section 106 Archaeology Guidance* (June 2007) and *Recommended Approach for Consultation on Recovery of Significant Information from Archeological Sites* (1999; updated 2002) or subsequent revision or replacements thereof.

III. Project Coordination and Implementation

The BLRI will coordinate the Section 106 review activities of all federal agencies or other partners using federal funding or permits that participate in the actions associated with the BLRI on NPS property

IV. Report Requirements

The BLRI shall ensure that decisions regarding the dissemination of information generated as a result of carrying out the terms of this agreement are made in accordance with Section 304 of the NHPA and the National Register Bulletin 29, entitled *Guidelines for Restricting Information About Historic and Prehistoric Resources* (February 15, 2000). When the information in question has been developed in the course of an agency's compliance with Section 106 or 110(f), the Secretary shall consult with the ACHP in reaching

determinations under subsections (a) and (b).

V. Monitoring of Performance under the Agreement

The SHPO may monitor activities carried out pursuant to this PA, and the ACHP may review such activities if so requested. The BLRI will cooperate with the SHPO in carrying out their monitoring and review responsibilities.

VI. Post Review Discoveries

- A. In the event that a previously unidentified archeological resource is discovered during ground disturbing activities, the BLRI shall immediately notify the SHPO. All construction work involving subsurface disturbance will be halted in the area of the resource and in the surrounding area where further subsurface resources can reasonably be expected to occur. The BLRI and the SHPO, or an archeologist approved by them, immediately will inspect the work site and determine the area and the nature of the affected archeological property. With SHPO concurrence, construction work may then continue in those portions of the project area where archeological resources will not be impacted. The BLRI in consultation with the SHPO will determine the National Register eligibility of the resource.
- B. If the resource is determined to meet National Register Criteria (36 CFR Part 60.6), the NPS will ensure compliance with Section 800.13 of the ACHP's regulations. Work in the affected area shall not proceed until either (a) the development or implementation of appropriate data recovery or other recommended mitigation procedures, or (b) the determination is made that the located resources are not eligible for inclusion on the National Register.
- C. Treatment of any inadvertent discoveries that might be subject to the provisions of the Native American Grave Protection and Repatriation Act (NAGPRA) is not a part of this PA and will be governed by NAGPRA.

VII. Dispute Resolution

- A. Should either party to this PA object to any action carried out or proposed under the terms of this PA, the parties will consult to resolve the objection.
- B. If after such consultation the dispute cannot be resolved, Section X, "Dispute Resolution" of the 2008 PA shall govern.
- C. At any time during implementation of the measures stipulated in this agreement, should an objection pertaining to this agreement be raised by a member of the public, the party to this agreement receiving the objection shall notify the other parties to this agreement and the BLRI will take the objection into account, consulting with the objector and, should the objector so request, with any of the parties to this agreement to resolve the objection.

VIII. Amending the Agreement

Any party to this PA may propose that the PA be amended, whereupon the parties to this PA will consider such an amendment. Both signatories to the PA must agree to the proposed amendment in accordance with 800.5(e) (5). The amendment will be effective on the date it is signed by both of the signatories and filed with the ACHP.

IX. Terminating the Agreement


- A. If the BLRI determines that it cannot implement the terms of this PA, or if the SHPO determines that the agreement is not being properly implemented, the BLRI or the SHPO may propose to the other party that it be terminated.
- B. Termination shall include the submission of any outstanding technical reports on any work done up to and including the date of termination.
- C. A party proposing to terminate this agreement shall so notify all parties to the agreement, explaining the reasons for termination and affording them at least thirty (30) days to consult and seek alternatives to termination. The parties shall then consult.
- D. Should such consultation fail and the agreement be terminated, the BLRI will comply with the 2008 PA and 36 CFR Part 800.3 through Part 800.6 with regard to individual actions covered by this PA.

X. Duration of the Agreement

This PA will continue in full force and effect until five years after the date of the last signature. At any time in the sixth-month period prior to such date, the NPS may request the SHPO to consider an extension or modification of this agreement. No extension or modification will be effective unless all parties to the PA have agreed with it in writing.


Signatures

NATIONAL PARK SERVICE

By: 
Phillip A. Francis Jr., Superintendent Blue Ridge Parkway

Date: 10/25/10

VIRGINIA STATE HISTORIC PRESERVATION OFFICER

By: 
Kathleen S. Kilpatrick Director, Department of Historic Resources

Date: 11/8/10

APPENDIX C

Non-Impairment Determination

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 environmental consequences chapter 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, and park operations 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 and Geology

Impacts to soils from implementing the selected alternative will provide the greatest protection of soil and geological features with the introduction of user groups providing trail maintenance on a routine basis, as needs arise. Some additional ground exposure might occur with the introduction of mountain bikes on Roanoke River Parkway, but this impact will be minor. The protection measures set forth in the selected alternative will ensure that there will be no impairment to soils and geology.

Water Resources

Implementation of the selected alternative will have negligible adverse impacts on water quality as eroded soils enter streams and creeks adjacent to the trails. However, trails will be adequately maintained by user groups and construction of additional mountain bike trails will be to strict specifications limiting cut and fill slopes. Therefore, there will be no impairment to water resources as a result of implementation of the selected alternative.

Vegetation

Adverse impacts under the selected alternative to vegetation from horse or pedestrian use will be minor in intensity for the most part. These impacts will be mitigated routinely through use of volunteer labor (volunteer agreements to maintain trails) and the direct loss of exotic vegetation to construction of the trail will be beneficial. Therefore, there is no reason to suspect that actions under the selected alternative will pose a risk of impairment to the park's vegetation.

Wildlife

Impacts to wildlife from implementing the selected alternative will be negligible to minor. Leaving trees along the trail corridor will successfully maximize salamander habitat. Education of mountain bikers will reduce some excessive displays of challenging maneuvers. Management of the trail system vegetation might include forest and open fields increasing habitat diversity. Therefore, no wildlife will be impaired as a result of implementation of the selected alternative.

Archeological Resources

Under the selected alternative, no perceptible impacts to archeological resources are expected. Phase I investigations will be undertaken to determine if archeological deposits are present and to establish their locations and boundaries before the trail or parking areas will be constructed. This will allow rerouting of the trail or relocation of parking areas to avoid disturbance of these sites. If sites cannot be avoided, Phase III mitigations will occur after consultation with the SHPO, as per the 2010 PA. Therefore, there will be no impairment to archeological resources under the selected alternative.

APPENDIX D

Public Comments Content Analysis Report

Comment Distribution by Status

Status	Number of Comments
Coded	1,054
Total	1,054

Comment Distribution by Code

(Note: Each comment may have multiple codes. As a result, the total number of comments may be different than the actual comment totals)

Code	Description	Number of Comments
AA002	Environmentally Preferred Alternative: In favor of Alternative B	3
AA003	Preferred Alternative: In Favor of Alternative C	10
AA0031	Preferred Alternative: Opposed to Alternative C	16
AA0032	One-year Pilot Project: Include a one-year pilot project to evaluate shared use of the Chestnut Ridge Loop for hikers, equestrians and mountain bikers	144
AA0033	One-year Pilot Project: Opposed to trial period on Chestnut Ridge for bikes	1
AE10002	Additional Alternatives: Additional bike lanes, modified use, etc.	18
AE11000	Affected Environment: Species Of Special Concern	3
AE22001	Affected Environment: Current trail conditions	1
AE7000	Affected Environment: Air Quality	1
AE9001	Affected Environment: Water Quality & Wetlands	1
AF10001	Access/Social Trails: assess a yearly access fee	3
AL001	In Favor of Multi-Use Trails (hikers, bikers, horses)	282
AL002	Opposed to bikes on trails (hikers and horses only)	44
AL003	Social Trails: Leave the unauthorized social trails open to provide public access to roads until such time that resources are available to provide alternative access points	231
AL004	Social Trails: Agree with closing unauthorized accesses	5
AL2000	Alternatives: Alternatives Eliminated	21
AQ1000	Air Quality: Guiding Policies, Regs, Laws	4
AQ1001	Air Quality: Mitigations	1
CA3000	Cooperative Agreement: Renew the Greenway Commissions CA	5
CC1000	Consultation and Coordination: General Comments	213
CC1001	Consultation and Coordination: Requirements	32
CR1000	Cultural Resources: Guiding Policies, Regs And Laws	3

CU2001	Commercial Use: Stop horseback riders using trails for personal financial gain	1
DT00001	Deer Trail: Prior to closure of the unauthorized social trail (Deer Trail), construct a paved connection for bicyclists through the ranger station and allow hikers to continue using the Deer Trail connection from Mountain View Road to the horse trail	2
ER0001	Impacts: Erosion to Trails	8
ES1000	Erosion & Sediment Control & Stormwater Mgmt: Guiding Policies, Regs And Laws	5
ES1002	Erosion & Sediment Control & Stormwater Mgmt: Mitigations	2
FI00001	Roanoke River Trail: In favor of leaving access to the river for fishing open	1
GA3000	Impact Analysis: General Methodology For Establishing Impacts/Effects	13
HA1001	Cultural Resources: Agency Recommendations	1
HA2000	Cultural Resources: Mitigations	1
HI0001	Highway crossings: In favor of working with VDOT to improve crossings	2
HL1000	Healthy Lifestyle: Biking Provides Proven Health Benefits	28
HO0002	Horse Trailer Parking: Provide parking for horse trailers	6
HO001	In Favor of Horses on Trails	2
IA2101	Impact Analysis: Analysis and site location of bicycle access on Blue Ridge Parkway trails	1
IP100	ISSUES - Park management issues	14
LE3000	Road Connectivity: Define legal ingress/egress at trail crossings of Rt 116, Bandy Rd., and Yellow Mtn. Rd.	1
LR1000	Local and Regional Cooperation: Guiding Policies, Regs And Laws	1
MI001	Roanoke Valley Greenway Commission: Mitigations	4
MO20000	Modified Preferred Alternative: In favor of preferred alternative with modifications	126
MT1000	Miscellaneous Topics: General Comments	157
NH0001	Affected Environment: Natural Heritage Resources	4
NH1000	Natural Heritage Resources: Guiding Policies, Regs And Laws	2
NH1001	Natural Heritage Resources: Agency Recommendations	6
NH1002	Natural Heritage Resources: Mitigations	2
OA1000	Alternatives: Impacts to Other Agencies' Land Use Plans	41
ON1000	Other NEPA Issues: General Comments	54
PA001	Parking: In favor of additional parking	4
PH1000	Pesticides & Herbicides: Agency Recommendations	1
PO4000	Park Operations: Impact Of Proposal And Alternatives	24

PP1000	Pollution Prevention: Agency Recommendations	1
PT10001	Paved Trails: no need for paved trails on Parkway	7
PT1002	Paved Trails: in favor of paved access trails	20
RE091311	RESOLUTION 091311-1: County of Roanoke resolution expressing support for the Roanoke Valley/BLRI Trail Plan EA with modifications	10
RE39195	RESOLUTION 39195-090611: City of Roanoke resolution requesting NPS amend the Trail Plan/EA to address City concerns	8
RER1000	Recreational Resources: Guiding Policies, Regs And Laws	1
RER1001	Recreational Resources: Agency Recommendations	6
RER1002	Recreational Resources: Mitigations	3
RF1000	References: General Comments	5
RR00001	Eastern Extension of the Roanoke River Greenway: Provide extension of the Roanoke River Greenway along the Roanoke River from BLRI to Explore Park	172
RR00002	Roanoke River: Include bike/pedestrian bridge over the Roanoke River	18
RR0003	Rutrough Road: Explore additional options for access and crossings at Rutrough Rd., as current location shown on maps has limited sight distance	4
RT10001	Ranger Interaction: Park Rangers treatment of bicyclists	5
SE1001	Socioeconomics: Expanding trail use to allow mountain bikes would benefit local and regional community, attract more visitors, increase commerce, etc.	29
SHW1000	Solid & Hazardous Wastes & Hazardous Materials: Guiding Policies, Regs And Laws	4
SHW1001	Solid & Hazardous Wastes & Hazardous Materials: Agency Recommendations	1
SHW1002	Solid & Hazardous Wastes & Hazardous Materials: Mitigations	5
SHW1003	Affected Environment: Solid & Hazardous Wastes & Hazardous Materials	6
SI001	Signage and education: use of trail signs, trail mapping, brochures, trail user education, etc.	8
SL1001	Speed Limit: Reduce to 35 MPH Between Routes 24 and US 220 on BLRI	3
SL1002	Speed Limit: Reduce to 35 MPH Between Routes 460 and US 220 on BLRI	2
ST3001	Visual Impacts: Negligible visual impacts from social trails	11
SU0001	Subaqueous Lands: Guiding Policies, Regs And Laws	4
SU0002	Subaqueous Lands: Mitigations	1
TC10001	Commuter Traffic: Reduce commuter traffic	7
TE4000	Threatened And Endangered Species: Impact Of Proposal And Alternatives	1

TE7000	Threatened And Endangered Species: Mitigations	4
TP1000	Tree Protection: Guiding Policies, Regs And Laws	1
TP1001	Tree Protection: Agency Recommendations	1
TR1000	Transportation System: Mitigations	1
VE4000	Visitor Experience: Impact Of Proposal And Alternatives	12
VO001	Volunteers: Use of Volunteers	173
VS00001	Visitor Safety: If social trails are closed, there will be unsafe access to trails	28
VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives	19
WA20001	Bike Access: Bike access from Pitzer Rd. (VSR 617) and Bandy Road (VSR 666) to Parkway	1
WH1000	Wildlife And Wildlife Habitat: Guiding Policies, Regs And Laws	4
WH3000	Wildlife And Wildlife Habitat: Agency Recommendations	14
WH4001	Wildlife And Wildlife Habitat: Mitigations	1
WQW1000	Water Quality & Wetlands: Guiding Policies, Regs And Laws	1
WQW1001	Water Quality & Wetlands: Agency Recommendations	2
WQW1002	Water Quality & Wetlands: Mitigations	1
WS1000	Water Supply: Guiding Policies, Regs And Laws	3
WS1001	Water Supply: Mitigations	1
WS1002	Water Supply: Impact Of Proposal And Alternatives	2
WS1003	Affected Environment: Water Supply	1

Correspondence Signature Count by Organization Type

Organization Type	Number of Correspondences
Town or City Government	11
Business	5
County Government	3
Federal Government	1
University/Professional Society	1
State Government	2
Conservation/Preservation	3
Recreational Groups	80
Civic Groups	3
Unaffiliated Individual	196
Total	305

Correspondence Distribution by State

State	Percentage	Number of Correspondence
VA	80.3 %	245
NC	12.8 %	39
GA	1.6 %	5
CO	1.3 %	4
SC	0.7 %	2
WV	0.7 %	2
LA	0.3 %	1
WI	0.3 %	1
AL	0.3 %	1
VT	0.3 %	1
ID	0.3 %	1
MO	0.3 %	1
OH	0.3 %	1
NE	0.3 %	1
Total	—	305

Correspondence Distribution by Correspondence Type

Type	Number of Correspondences
Web Form	247
Park Form	29
Letter	15
E-mail	14
Total	305

APPENDIX E

Agency/Organization Comments



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

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TDD (804) 698-4021

www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

September 8, 2011

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

RE: Draft Environmental Assessment: Roanoke Valley/Blue Ridge Parkway Trail
Plan, Department of the Interior, National Park Service (DEQ # 11-147F)

Dear Ms. Molling:

The Commonwealth of Virginia has completed its review of the above-referenced draft environmental assessment (EA). The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies joined in this review:

Department of Environmental Quality
Department of Game and Inland Fisheries
Department of Conservation and Recreation
Department of Health
Marine Resources Commission

The Department of Transportation, Department of Historic Resources, Roanoke Valley-Alleghany Regional Commission, City of Roanoke and Roanoke County also were invited to comment.

PROPOSED FEDERAL ACTION

The National Park Service (NPS) developed an environmental assessment (EA) to implement improvements for the Roanoke Valley Trail System within the lands administered by the Blue Ridge Parkway. The Roanoke Valley/Blue Ridge Parkway Trail Plan EA describes the affected environment and analyzes potential impacts associated with a no action alternative and two other alternatives. The plan explores the potential for development of a multi-jurisdictional and multi-use trail, considers upgrades to the existing trail system and addresses issues raised by the public regarding access and recreational use. The purpose of the proposed action is to develop a trail network that would link the Blue Ridge Parkway and the Roanoke Valley Greenway trail network in Roanoke County. The project includes establishing and continuing to maintain approximately 30 miles of pedestrian and horse trails, authorizing several greenway connections and authorizing mountain bike use adjacent to the Roanoke River Parkway. The EA states that additional impact analysis may be needed for site-specific actions that are not described in the plan. Implementation of the plan is dependent upon future funding.

Within the greater Roanoke area, there are approximately 42 unauthorized trails totaling 4.1 miles. All alternatives include the closure of unauthorized trails. The No Action Alternative primarily focuses on closing unauthorized trails. Alternative B is identified by the NPS as the environmentally preferred alternative as determined by NPS. Under this alternative, current and future trail needs along the Roanoke Valley section of the park would be addressed. New loop and connector trails, bicycle and pedestrian access, and new trailhead parking would be constructed. Alternative C is the NPS Preferred Alternative. This alternative would include action in the previously identified alternatives as well as the construction of a separate mountain biking and pedestrian trail system (for approximately 3.5 miles) on the Roanoke River Parkway.

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Water Quality and Wetlands. The EA (page 10) states that the proposed trail system would cross or access 11 tributaries that flow into Back Creek, Woof Creek and the Roanoke River.

1(a) Agency Jurisdiction. The State Water Control Board promulgates Virginia's water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System Permit (VPDES), Virginia Pollution Abatement Permit, Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit. The VWP Permit is a state permit which governs wetlands, surface water and surface water withdrawals/impoundments. It also serves as § 401 certification of the federal Clean Water Act § 404 permits for dredge and fill activities in waters of the United States. The VWP Permit Program is under the Office of Wetlands and Water Protection and Compliance within the DEQ Division of Water Quality Programs. In addition to central office staff who review and issue VWP Permits for transportation and water withdrawal

projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities.

1(b) Requirements. Impacts to surface water or wetlands may require authorization by DEQ prior to any land disturbance.

1(c) Agency Recommendations. In general, DEQ recommends that stream and wetland impacts be avoided to the maximum extent practicable. To minimize unavoidable impacts to wetlands and waterways when planning for land-disturbing activities, DEQ recommends the following practices:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable.
- Preserve the top 12 inches of material removed from wetlands for use as wetland seed and root-stock in the excavated area.
- Design erosion and sedimentation controls in accordance with the most current edition of the *Virginia Erosion and Sediment Control Handbook*. These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to state waters. The controls should remain in place until the area is stabilized.
- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.
- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub or forested). The applicant should take all appropriate measures to promote revegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.
- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats or geotextile fabric in order to prevent entry in state waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.
- Clearly flag all non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading or filling activities and mark them for the life of the construction activity within that area. The project proponent should notify all contractors that these marked areas are surface waters where no activities are to occur.
- Employ measures to prevent spills of fuels or lubricants into state waters.

1(d) Agency Recommendation. Contact DEQ BRRO (Kip Foster at 540-562-6782) regarding impacts to surface water or wetlands prior to land disturbance to ensure compliance with the Virginia Water Protection (VWP) Program.

2. Subaqueous Lands. The EA (page 21) states that stream crossings would require a permit from the U.S. Army Corps of Engineers (Corps).

2(a) Agency Jurisdiction. The Virginia Marine Resources Commission (VMRC) regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to § 28.2-1200 through 1400 of the *Code of Virginia*.

The VMRC serves as the clearinghouse for the Joint Permit Application (JPA) used by the:

- Corps for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;
- DEQ for issuance of a VWP permit;
- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands; and
- local wetlands board for impacts to wetlands.

The VMRC will distribute the completed JPA to the appropriate agencies. Each agency will conduct its review and respond.

2(b) Agency Comments. Pursuant to Section 28.2-1200 *et seq.* of the *Code of Virginia*, VMRC has jurisdiction over any encroachments in, on or over the beds of the bays, ocean, rivers, streams or creeks which are the property of the Commonwealth. Accordingly, if any portion of the project involves any encroachments channelward of ordinary high water along natural rivers and streams above the fall line or mean low water below the fall line, a permit may be required from VMRC. Any jurisdictional impacts and permitting will be reviewed by VMRC during the JPA process.

2(c) Agency Recommendation. Contact Dan Bacon with the VMRC at (757) 247-2256 to determine if a JPA is needed prior to any land-disturbing activities.

3. Erosion and Sediment Control, and Stormwater Management. The EA (page 34) states that alternatives B and C would protect soils better than the no action alternative.

3(a) Agency Jurisdiction. The Department of Conservation and Recreation (DCR) Division of Stormwater Management administers the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and Virginia Stormwater Management Law and Regulations (VSWML&R).

3(b) Erosion and Sediment Control, and Stormwater Management. The NPS and its authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with the VESCL&R and VSWML&R, including coverage under the General Permit for Discharges of Stormwater from Construction

Activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act Section 313). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles and related land-disturbance activities that result in the land disturbance of 10,000 square feet would be regulated by VESCL&R.

Accordingly, the NPS must prepare and implement an erosion and sediment control plan (ESC) to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR regional office that serves the area where the project is located for review for compliance. The NPS is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites and other mechanisms consistent with agency policy.

3(c) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. According to DCR, the operator or owner of construction activities involving land-disturbing activities equal to or greater than 1 acre are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific SWPPP. Construction activities requiring registration also includes the land-disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit, and it must address water quality and quantity in accordance with the VSMP Permit Regulations. General information and registration forms for the General Permit for Discharges of Stormwater from Construction Activities are available on DCR's website at www.dcr.virginia.gov/soil_and_water/vsmp.shtml.

4. Air Quality Impacts. The EA (page 11) states that impacts to air quality during the construction of the project would be temporary. Best management practices would be implemented.

4(a) Agency Jurisdiction. The DEQ Air Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations that become Virginia's Air Pollution Control Law. DEQ is charged with carrying out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

4(b) Ozone Status. According to the DEQ Air Division, the project location is in an ozone attainment area.

4(c) Open Burning. If the project includes the burning of vegetative debris, this activity must meet the requirements under 9VAC5-130 *et seq.* of the regulations for open burning, and it may require a permit. The regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. Contact officials with the appropriate locality to determine what local requirements, if any, exist.

4(d) Fugitive Dust. During construction and operation, fugitive dust must be kept to a minimum by using control methods outlined in 9VAC5-50-60 *et seq.* of the Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

Contact DEQ BRRO (Jed Brown at 434-582-6210) for additional information if necessary.

5. Solid and Hazardous Wastes, and Hazardous Materials. The EA does not address waste management.

5(a) Agency Jurisdiction. Solid and hazardous wastes in Virginia are regulated by DEQ, the Virginia Waste Management Board and EPA. They administer programs created by the federal Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act, commonly called Superfund, and the Virginia Waste Management Act. DEQ administers regulations established by the Virginia Waste Management Board and reviews permit applications for completeness and conformance with facility standards and financial assurance requirements. All Virginia localities are required, under the Solid Waste Management Planning Regulations, to identify the strategies they will follow on the management of their solid wastes to include items such as facility siting, long-term (20-year) use, and alternative programs such as materials recycling and composting.

5(b) Database and Data File Search. The DEQ Division of Land Protection and Revitalization (formally the Waste Division) (DLPR) states that the EA did not address potential solid and/or hazardous waste issues or indicate that DEQ's databases were searched or that information was obtained from DEQ's databases. The DLPR conducted a cursory review of its database files, including a Geographic Information System database search, of the project site and determined that a few facility waste sites of concern were located within the same zip code of the proposed project or a half-

mile radius; however, the proximities of identified potential waste sites of concern to the project sites and/or potential impact to the project should be further evaluated, if not done already.

Hazardous Waste Facilities

A search of the RCRAInfo database found the following facility information under large quantity generators (LQGs) and permitted treatment, storage, disposal (TSD) facilities under the Resource Conservation and Recovery Act (RCRA):

- Safety-Kleen Systems, Inc., 16090 Stewartsville Road, Vinton, VA, EPA ID No. VAD000737361, Listed as a Full Enforcement Facility under RCRA, and a TSD (Active) Permitted Facility, a LQG Facility, and subject to RCRA Corrective Action. (Todd Blake, Safety-Kleen Systems, at 336-644-0332 and Ryan Kelly, DEQ Corrective Action, at 804-698-4045). Additional information is available online at http://iaspub.epa.gov/apex/cimc/f?p=255:48:1951902602608893::::P48_REGISTRY_ID:110000585563.
- Custom Wood Products, Inc., Aerial Way Drive, Roanoke, VA, 24018, EPA ID No. VAR000016360, Listed as a LQG Facility (Sheri Sloss, Facility contact, at 540-342-0363, ext. 142).

Solid Waste Facilities

A search of the DEQ's Solid Waste Sites Inventory found the following facilities:

- Permit-by-Rule (PBR) 080, Transfer Station Safety Kleen systems, Inc., Route 24 and O'Neal Drive, 16090 Stewartsville Road, Vinton, VA, 24179, Solid Waste Unit Status – Closed, Solid Waste Permit Status – Permit Revoked.
- PBR 375, Regulated Medical Waste Incinerator, Carilion Roanoke Memorial Hospital, Bellview at Jefferson, Roanoke, VA, 24014, Solid Waste Unit Status – Closed, Solid Waste Permit Status – Permitted.

CERCLA Sites

The following Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) facilities were found on the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database:

- Cycle Systems, 338 Walnut Avenue, Roanoke, VA, 24014, EPA ID No. VA0000801050, Not on the National Priorities List (NPL), Not a Federal Facility, Removal Only Site (No Site Assessment Work Needed).
- Starlight Lane Tire Fire, 7000 Starkey Road, Roanoke, VA, 24014, EPA ID No. VAN000305871, Not on the NPL, Not a Federal Facility, Removal Only Site (No Site Assessment Work Needed).

- Yellow Mountain Road, 5188 Yellow Mountain Road, Roanoke, VA, 24014-6734, EPA ID No. VAN000306187, Not on the NPL, Not a Federal Facility, Removal Only Site (No Site Assessment Work Needed).
- Roanoke Water Chemical, Aerial Way and Peters Creek Road, Roanoke, VA, 24018, EPA ID No. VAN000306674, Not on the NPL, Not a Federal Facility, Removal Only Site (No Site Assessment Work Needed).

If any of the above identified sites are found to be in close proximity to the proposed project, then further information regarding the sites may be necessary.

FUDS Sites

No Formally Used Defense Sites (FUDS) were found on DEQ's FUDs Sites Inventory under zip code 24523 and/or within 0.5 miles of the project sites.

VRP Sites

The following DEQ Voluntary Remediation Program (VRP) facility site was found on DEQ's VRP Sites Inventory under zip codes 24531, 24590, 20109, 20120, and 20121, and/or within a half-mile of the project site:

- Vinton Dry Cleaner, Vinton, VA, 24179, VRP No. VRP00486, Status – Enrolled in VRP.
- Professional Cleaners of Roanoke, Roanoke, VA, 24014, VRP No. VRP00309, Status – VPR Certificate Issued.
- Outpatient Surgery Center Facility, Roanoke, VA, 24018, VRP No. VRP00358, Status – VRP Certificate Issued.

These VRP cases should be further evaluated by the project engineer or manager to establish the exact location of the release and the nature and extent of the release and the potential to impact the proposed project.

Petroleum Release Sites

The following petroleum release sites were found in DEQ's inventory within zip code 24523 and within a half-mile of the project site:

- Bulk Storage Facility, 2516 Mountain View Avenue, Stewartsville, VA, 24179, DEQ PC No. 19911420, 2/28/2008, Status – Confirmed, Case Closed.
- Bulk Storage Facility, 2516 Mountain View Avenue, Stewartsville, VA, 24179, DEQ PC No. 20002070, 1/26/2006, Status – Confirmed, Case Closed.
- Former Buck Mountain Grill Property, 5002 Franklin Road, Roanoke, VA, 24014, DEQ PC No. 20032059, 9/27/2006, Status – Confirmed, Case Closed.
- Virginia Asphalt Paving Company, Inc. – Shop, Eagle Crest Drive, Roanoke, VA, 24014, 2/23/2011, Status – Confirmed, Case Closed.

These cases should be evaluated by the project engineer or manager to establish the exact location of the release and the nature and extent of the petroleum release and the potential to impact the proposed project. The facility representative should contact the DEQ VRP and DEQ BRRO for further information and the administrative records of the cases.

5(c) Agency Recommendations.

- DEQ encourages all construction projects and facilities to implement pollution prevention principles, including:
 - the reduction, reuse and recycling of all solid wastes generated; and
 - the minimization and proper handling of generated hazardous wastes.
- Further evaluate identified potential waste sites of concern to the project sites and/or potential impact to the project, if not done so already.
- Evaluate the location of the identified CERCLA sites, and if they are in close proximity to the proposed project site, contact the EPA Office of Solid Waste and Emergency Response (OSWER) (202-566-0200, www.epa.gov/aboutepa/oswer.html#OSRTI) or the DEQ Office of Remediation Programs (Durwood Willis at 804-698-4192).
- Evaluate petroleum releases to establish the exact location, nature and extent of the release and the potential to impact the proposed project.
- Contact the DEQ BRRO Tank Program (David Miles at David.Miles@deq.virginia.gov) for further information and the administrative records of the petroleum release cases which are in close proximity to the proposed project.
- Further evaluate identified VRP cases to establish the exact location, nature and extent of the release and the potential to impact the proposed project.
- Contact DEQ VRP (Kevin Greene at 804-698-4236) and/or the DEQ BRRO (David Miles at David.Miles@deq.virginia.gov) for further information and the administrative records of the VRP cases.

5(d) Requirements. Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable federal, state and local laws and regulations.

6. Natural Heritage Resources. The EA (pages 39 and 40) states that vegetation resources would not be impaired.

6(a) Agency Jurisdiction. The mission of DCR is to conserve Virginia's natural and recreational resources. The DCR Division of Natural Heritage's (DNH) mission is

conserving Virginia's biodiversity through inventory, protection and stewardship. The Virginia Natural Area Preserves Act, 10.1-209 through 217 of the Code of Virginia, was passed in 1989 and codified DCR's powers and duties related to statewide biological inventory: maintaining a statewide database for conservation planning and project review, land protection for the conservation of biodiversity, and the protection and ecological management of natural heritage resources (the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features).

6(b) Agency Findings. DCR has the following findings:

Hardy Quad: According to the information currently in DCR's files, Roanoke River 2, which has been designated by the Virginia Department of Game and Inland Fisheries (DGIF) as a Threatened and Endangered Species Water, is within the project site. The associated species is the Roanoke logperch (*Percina rex*, G1G2/S1S2/LE/LE) and Orange-fin madtom (*Noturus gilberti*, G2/S2/SOC/LT).

Stewartsville Quad: According to the information currently in DCR's files, Glade Creek, which has been designated by the Department of Game and Inland Fisheries (DGIF) as a Threatened and Endangered Species Water, is downstream from the project site. The associated species is the Roanoke logperch. The Roanoke River 2 Threatened and Endangered Species Water is also within the project site.

Garden City Quad: The project area west of Rt. 663 is situated on karst-forming carbonate rock and can be characterized by sinkholes, caves, disappearing streams, and large springs. Karst features include sinkholes, caves, disappearing streams, and large springs. Discharge of runoff to sinkholes or sinking streams, filling of sinkholes, and alteration of cave entrances can lead to surface collapse, flooding, erosion and sedimentation, groundwater contamination, and degradation of subterranean habitat for natural heritage resources.

6(c) Threatened and Endangered Plant and Insect Species. Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and DCR, DCR has the authority to report for VDACS on state-listed plant and insect species. DCR states that the current activity will not affect any documented state-listed plants or insects.

6(d) Natural Area Preserves. DCR states that there are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

6(e) Agency Recommendations.

- Contact the DCR DNH at (804) 786-7951 for an update on this natural heritage information if a significant amount of time passes before it is utilized since new and updated information is continually added to the Biotics Data System.
- Coordinate with DCR (Wil Orndorff at 540-394-2552 or at Wil.Orndorff@dcr.virginia.gov) to document and minimize adverse impacts if karst features,

including sinkholes, caves, disappearing streams and large springs, are encountered during the project.

- Due to the legal status of the Roanoke logperch and Orange-fin madtom, coordinate with the U.S. Fish and Wildlife Service (FWS) (804-693-6694) and DGIF (Ernie Aschenbach at Ernie.Aschenbach@dgif.virginia.gov) to ensure compliance with protected species legislation.

7. Wildlife Resources. The EA (page 42) states that long-term effects to wildlife would be negligible. In addition, the EA (page 12) states that there are no federally-listed threatened or endangered animals in the vicinity, so threatened and endangered species were dismissed from further consideration.

7(a) Agency Jurisdiction. DGIF, as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state- or federally-listed endangered or threatened species, but excluding listed insects (Virginia Code Title 29.1). DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 *et seq.*) and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce or compensate for those impacts. For more information, see the DGIF website at www.dgif.virginia.gov.

7(b) Agency Comments. DGIF supports the environmentally preferred alternative (Alternative B), which proposes maintenance of existing authorized trails and improved safety signage, closure of unsafe and unauthorized trails, creation of safe trailheads and access points for multi-modal users (e.g., hikers, mountain bikers, horse riders), and coordination with the Virginia Department of Transportation (VDOT) to create safe road crossings with appropriate trailhead parking and appurtenances. DGIF supports retaining native-vegetative cover for wildlife habitat and as a means of controlling erosion and stream sedimentation, as proposed, and the removal and control of non-native invasive plant and insect species, as proposed.

7(c) Agency Findings. According to DGIF's records, the Roanoke River is a designated Threatened and Endangered species water for the federally-listed endangered and state-listed endangered Roanoke logperch and state-listed threatened orange-fin madtom.

7(d) Agency Recommendations. DGIF has the following recommendations:

- If the use of herbicides or pesticides becomes necessary, coordinate with DGIF (Ernie Achenbach at Ernie.Achenbach@dgif.virginia.gov or Amy Ewing at Amy.Ewing@dgif.virginia.gov) prior to chemical treatment. DGIF states that it will strive to review chemical treatment proposals and provide site-specific comments on a case-by-case basis. Sensitive areas of concern include but are not limited to aquatic habitat (e.g., streams, and wetlands) and surrounding riparian areas.

- If a bridge across the Roanoke River is proposed, avoid in-stream work and use of a clear-span crossing structure, if practicable.
- If streambank stabilization becomes necessary, stabilize streambanks and help minimize erosion and sedimentation of aquatic habitat. Stage work from the top of the streambank or from the existing roads or trails, if possible.
- If instream work becomes necessary, conduct any instream activities during low or no-flow conditions, using non-erodible cofferdams to isolate the construction area, blocking no more than 50% of the stream flow at any given time, stockpiling excavated material in a manner that prevents reentry into the stream, restoring original streambed and streambank contours, revegetating barren areas with native vegetation, and implementing strict erosion and sediment control measures.
- In general, DGIF recommends and supports using natural streambank stabilization methods, rather than hardened structure such as riprap and/or gabions whenever practicable. Contact DGIF for natural streambank stabilization guidance. Contact DGIF (Justin Laughlin, DGIF Region III Stream Restoration Biologist at 276-783-4860 or Louise Finger, DGIF Region IV Stream Restoration Biologist at 540-248-9360) for natural streambank stabilization guidance.
- Strictly adhere to erosion and sediment controls.
- If instream work becomes necessary, coordinate with DGIF, prior to all instream work, so that we can provide site-specific guidance. (Depending on the proposed scope, location, duration and timing of instream work, DGIF states that it may recommend a time-of-year restriction prohibiting instream work during a time period to protect listed species. When additional information becomes available, DGIF will provide further guidance as appropriate.
- Contact the FWS (804-693-6694) regarding all federally-listed species.
- Contact DCR (Rene' Hypes at Rene.Hypes@dcr.virginia.gov) and VDACS (Keith Tignor at Keith.Tignor@vdacs.virginia.gov) for guidance regarding all state-listed plant and insect species known from the area.

To minimize overall impacts to wildlife and natural resources, DGIF offers the following comments about development activities:

- Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable. Avoidance and minimization may include relocating stream channels as opposed to filling or channelizing as well as using, and incorporating into the development plan, a natural stream channel design and wooded buffers.

- Maintain undisturbed wooded buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams.
- Maintain wooded lots to the fullest extent possible.
- Design stormwater controls to replicate and maintain the hydrographic condition of the site prior to the change in landscape, if practicable. This should include, but not be limited to, utilizing bioretention areas, and minimizing the use of curb and gutter in favor of grassed swales. Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.
- Construct trails and sidewalks of pervious surfaces.

8. Historic and Architectural Resources. The EA (page 46) states that NPS would need to perform Phase I archeological surveys prior to construction activities as per the 2010 Programmatic Agreement with the Virginia Department of Historic Resources (DHR).

8(a) Agency Jurisdiction. DHR conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulation at 36 CFR Part 800. The preservation act requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals or funding. DHR also provides comments to DEQ through the state environmental impact report review process.

8(b) Agency Comments. DHR did not respond to DEQ's request for comment.

8(c) Agency Recommendation. Coordinate the project or any portion thereof with DHR (Roger Kirchen at Roger.Kirchen@dhr.virginia.gov), as the designated Virginia SHPO, to ensure compliance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations at 36 CFR 800.

9. Recreational Resources.

9(a) Agency Jurisdiction. DCR's Division of Planning and Recreational Resources (DPRR) administers the Virginia Scenic Rivers, Virginia Byways, and state trails programs and is responsible for developing the Virginia Outdoors Plan (VOP), the state's comprehensive outdoor recreation and open space plan. The VOP recognizes the importance of scenery to Virginians and many of the top ten activities are water based.

9(b) Agency Comments. DCR concurs that Alternative C is the preferred option.

9(c) Agency Recommendations. After consulting with Roanoke County, DCR offers the following recommendations:

- Page 10 states that the Roanoke River Bridge is not included in this analysis; however, the maps show it as a potential for future crossing. The plan should clearly specify that a trail bridge is needed at the river.
- Build the paved connection for bicyclists through the Ranger Station at Deer Trail before any closure and to allow hikers to use the trail from Mountain View Road to the horse trail.
- Consider a crossing at Rutrough Road since the current location has limited site distances.
- The NPS did not analyze the previous Alternative C (2007 public meeting) which proposed mountain biking on Chestnut Ridge Loop Trail. Assessment of that alternative might have helped users understand why it was ruled out without further consideration. The Greenway Commission and volunteers expended substantial funding and labor rebuilding that trail to the standards requested by NPS staff to make Alternative C a viable option. Include an explanation in the final EA of why this alternative was not analyzed.
- The EA (page 33) states that horse trails would be maintained by horse riding clubs and that the Blue Ridge Parkway would consider eliminating horse use if trails are not maintained. Most trails have had minimal maintenance since the Greenway Commission agreement expired. Include information in the final EA about when horse closure would occur.
- Add parking for horses at Highland Road and add NPS trails standards to the bibliography in the final EA.
- In the final EA include the positive impacts to human health and safety that these additional active recreation resources will provide.

Contract DCR (Jennifer Wampler at Jennifer.Wampler@dcv.virginia.gov) for additional information about these comments and recommendations.

10. Water Supply. The EA (page 37) states that adverse impacts to water resources would be negligible. The EA does not specifically address long-term resources.

10(a) Agency Jurisdiction. The Virginia Department of Health (VDH) Office of Drinking Water (ODW) reviews projects for the potential to impact public drinking water sources (groundwater wells, springs and surface water intakes).

10(b) Agency Findings. VDH ODW states that there are no apparent impacts to public drinking water sources due to this project. Three groundwater wells are within a 1-mile radius of the proposed trail project between mile markers 112 and 113:

- Town of Vinton/Well 7/Route 24, approximately 1,630 feet from the existing trail,
- Parkway mile marker 116, Delaney Court Well, approximately 1,010 feet from a portion of trail alignment needing construction, and
- Between parkway mile markers 118 and 119, Garden City/Well 1, approximately 500 feet from the existing trail.

One surface water intake is located within a 5-mile radius of the project site. West Virginia Water Authority's Falling Creek Reservoir is up gradient of the trail portion located at Stewarts Knob. The project does not fall within Zone 1 (up to 5 miles into the watershed) or Zone 2 (greater than 5 miles into the watershed) of any public surface water sources.

10(c) Requirements. In addition, VDH states that potential impacts to public water distribution systems must be verified by the local utility. All utility work involving installation of new waterlines and appurtenances must comply with the Commonwealth's waterworks regulations and all applicable standards of the locality. VDH administers both federal and state laws governing waterworks operation.

Contact VDH (Barry E. Matthews at 804-864-7515) for additional information on water supply sources.

11. Tree Protection.

11(a) Agency Jurisdiction. The mission of the Virginia Department of Forestry (DOF) is to protect and develop healthy, sustainable forest resources for Virginians. DOF was established in 1914 to prevent and suppress forest fires and reforest bare lands. Since the Department's inception, it has grown and evolved to encompass other protection and management duties including: protecting Virginia's forests from wildfire, protecting Virginia's waters, managing and conserving Virginia's forests, managing state-owned lands and nurseries, and managing regulated incentive programs for forest landowners.

11(b) Recommendations. In general, the DOF recommends that, to the extent feasible, trees should be left in groupings or clusters to provide aesthetic and environmental benefits, as well as reducing costs associated with maintaining open space. The following measures are recommended during construction to protect trees not slated for removal:

- Trees should be marked and fenced at least to the drip line or the end of the root system, whichever extends farther from the stem. Marking should be done with highly visible ribbon so that equipment operators see the protected areas easily.

- Parking and stacking of heavy equipment and construction materials near trees can damage root systems by compacting the soil. Soil compaction, from weight or vibration, affects root growth, water and nutrient uptake, and gas exchange. The protection measures suggested above should be used for parking and stacking as well as for moving of equipment and materials. If parking and stacking are unavoidable, the contractors should use temporary crossing bridges or mats to minimize soil compaction and mechanical injury to plants.
- Any stockpiling of soil should take place away from trees. Piling soil at a tree stem can kill the root system of the tree. Soil stockpiles should be covered, as well, to prevent soil erosion and fugitive dust.

Questions concerning the protection of trees may be addressed to DOF (Todd Groh, Assistant Director of the DOF Forest Resource Management Division, at 434-220-9044 or at todd.groh@dof.virginia.gov).

12. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning and on-site best management practices will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design and operational procedures that will facilitate the reduction of wastes at the source.

12(a) Agency Recommendations. We have several pollution prevention recommendations that may be helpful during the construction:

- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure and building construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.

The DEQ Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques. If interested, please contact DEQ (Sharon Baxter at 804-698-4344) for more information.

13. Pesticides and Herbicides. In general, when pesticides or herbicides must be used, their use should be strictly in accordance with manufacturers' recommendations. In addition, to the extent feasible, DEQ recommends that the responsible agent for the project use the least toxic pesticides or herbicides effective in controlling the target

species. For more information on pesticide or herbicide use, please contact the Virginia Department of Agriculture and Consumer Services at (804) 786-3501.

14. Local and Regional Comments. As customary, DEQ invited the Roanoke Valley-Alleghany Regional Commission, the City of Roanoke and Roanoke County to comment.

14(a) Jurisdiction. In accordance with the Code of Virginia, Section 15.2-4207, planning district commissions encourage and facilitate local government cooperation and state-local cooperation in addressing, on a regional basis, problems of greater than local significance. The cooperation resulting from this is intended to facilitate the recognition and analysis of regional opportunities and take account of regional influences in planning and implementing public policies and services. Planning district commissions promote the orderly and efficient development of the physical, social and economic elements of the districts by planning, and encouraging and assisting localities to plan for the future.

14(b) Response. The Roanoke Valley-Alleghany Regional Commission, the City of Roanoke and Roanoke County did not respond to DEQ's request for comment.

REGULATORY AND COORDINATION NEEDS

1. Water Quality and Wetlands. Surface water or wetland impacts may require authorization by DEQ. Contact DEQ BRRO (Kip Foster at 540-562-6782) regarding impacts to surface water or wetlands prior to land disturbance to ensure compliance with the Virginia Water Protection (VWP) Program. If applicable, permitting action commences with the receipt of a complete Joint Permit Application (JPA).

2. Subaqueous Lands. Pursuant to § 28.2-1200 through 1400 of the Code of Virginia, the VMRC has jurisdiction over any encroachments in, on or over any state-owned rivers, streams or creeks in the Commonwealth. For additional information, contact VMRC (Dan Bacon at Dan.Bacon@mrc.virginia.gov or 757-247-2256) for information on submitting a JPA prior to land disturbance.

3. Erosion and Sediment Control, and Stormwater Management.

3(a) Erosion and Sediment Control. The NPS and its authorized agents conducting regulated land-disturbing activities equal to or greater than 10,000 square feet must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and Virginia Stormwater Management Law and Regulations (VSWML&R). The NPS also must prepare and implement an erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan should be submitted to the DCR Christiansburg Regional Office at (540) 394-2580 (Reference: VESCL §10.1-567).

3(b) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. For land-disturbing activities equal to or greater than 1 acre, the owner or operation of construction activities are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit, and it must address water quality and quantity in accordance with the VSMP Permit Regulations. Specific questions regarding the Stormwater Management Program requirements should be directed to DCR (Holly Sepety at 804-225-2613) (Reference: VSMA §10.1-603.1 *et seq.*; VSMP §4VAC-50 *et seq.*).

4. Air Quality Regulations. The following state air pollution regulations may apply to construction activities:

- fugitive dust and emissions control (9VAC5-50-60 *et seq.*); and
- open burning restrictions (9VAC5-130 *et seq.*).

For information on any local requirements pertaining to open burning, contact officials with the appropriate locality.

5. Solid and Hazardous Wastes. All solid waste, hazardous waste and hazardous materials must be managed in accordance with all applicable federal, state and local environmental regulations. Some of the state laws and regulations that may apply are:

- Virginia Waste Management Act (Code of Virginia Section 10.1-1400 *et seq.*);
- Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC20-60);
- Virginia Solid Waste Management Regulations (VSWMR) (9VAC20-81); and
- Virginia Regulations for the Transportation of Hazardous Materials (9VAC20-110).

Some of the applicable federal laws and regulations are:

- Resource Conservation and Recovery Act (RCRA) (42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations); and
- U.S. Department of Transportation Rules for Transportation of Hazardous materials (49 Code of Federal Regulations Part 107).

5(a) Coordination.

- Contact the EPA Office of Solid Waste and Emergency Response (OSWER) (202-566-0200, www.epa.gov/aboutepa/oswer.html#OSRTI) or the DEQ Office of Remediation Programs (Durwood Willis at 804-698-4192) regarding CERCLA sites in close proximity to the proposed project site.

- Contact DEQ BRRO Tank Program (David Miles at *David.Miles@deq.virginia.gov*) for further information and the administrative records of the petroleum release cases in close proximity to the proposed project.
- Contact DEQ VRP (Kevin Greene at 804698-4236) and/or the DEQ BRRO (David Miles at *David.Miles@deq.virginia.gov*) for further information and the administrative records of the VRP cases.

6. Natural Heritage Resources.

6(a) Biotics Data System. Contact the DCR DNH at (804)371-2708 for an update on natural heritage information if a significant amount of time passes before the project is implemented.

6(b) Karst. If the project involves filling or improvement of sinkholes or cave openings, submit detailed location information and copies of the design specifications to DCR. In cases where sinkhole improvement is for stormwater discharge, copies of Virginia Department of Transportation Form EQ-120 will suffice. For additional information and if karst features are encountered during the project, contact DCR (Wil Orndorff at 540-394-2552 or *Wil.Orndorff@dcr.virginia.gov*) to document and minimize adverse impacts.

7. Wildlife Resources and Protected Species.

- Contact DGIF (Justin Laughlin, DGIF Region III Stream Restoration Biologist at 276-783-4860 or Louise Finger, DGIF Region IV Stream Restoration Biologist at 540-248-9360) for natural streambank stabilization guidance.
- Coordinate with DGIF (Ernie Achenbach at *Ernie.Achenbach@dgif.virginia.gov* or Amy Ewing at *Amy.Ewing@dgif.virginia.gov*) if the use of herbicides or pesticides or instream work becomes necessary.
- Coordinate with the DGIF (Ernie Achenbach at *Ernie.Achenbach@dgif.virginia.gov* or Amy Ewing at *Amy.Ewing@dgif.virginia.gov*) and FWS (804-693-6694) to ensure compliance with protected species legislation.
- Contact DCR (Rene' Hypes at *Rene.Hypes@dcr.virginia.gov*) and VDACS (Keith Tignor at *Keith.Tignor@vdacs.virginia.gov*) for guidance regarding all state-listed plant and insect species known from the area.

8. Waterworks.

- All utility work involving installation of new waterlines and appurtenances must comply with the Commonwealth's waterworks regulations and all applicable standards of the locality.
- Coordinate with the local utility to verify potential impacts to public water distribution systems.

9. Historic Resources. Coordinate the project or any portion thereof with DHR (Roger Kirchen at *Roger.Kirchen@dhr.virginia.gov*), as the designated Virginia SHPO, to

ensure compliance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations at 36 CFR 800.

10. Transportation Impacts. Coordinate with VDOT (Chris Adkins at Chris.Adkins@vdot.virginia.gov) regarding potential impacts to the transportation system prior to implementation of the project.

CONCLUSION

Thank you for the opportunity to review the draft EA. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4325 or Julia Wellman at (804) 698-4326 for clarification of these comments.

Sincerely,



Ellie L. Irons, Program Manager
Environmental Impact Review

Enclosures

cc: Wayne Strickland, Roanoke Valley-Alleghany
Christopher Morrill, City of Roanoke
B. Clayton Goodman, Roanoke County

ec: Ernie Aschenbach, DGIF
Keith Tignor, VDACS
Robbie Rhur, DCR
Barry Matthews, VDH
Richard Criqui, DEQ ORP
Kotur S. Narasimhan, DEQ DAPC
Kevin Harlow, DEQ BRRO
Roger Kirchen, DHR
Chris Adkins, VDOT
Dan Bacon, MRC

APPENDIX F

Response to Comments

As required by the National Park Service (NPS) Director's Order No. 12, the NPS has responded to all substantive comments submitted on the document entitled "Roanoke Valley / Blue Ridge Parkway Trail Plan/Environmental Assessment" for the Blue Ridge Parkway (the Park, the Parkway or BLRI).

Director's Order No. 12 defines a "substantive" comment as one that does one or more of the following:

- Question, with reasonable basis, the accuracy of the information in the EA.
- Question, with reasonable basis, the adequacy of the environmental analysis in the EA.
- Present reasonable alternatives other than those presented in the EA.
- Cause changes or revisions in the proposal.

Substantive comments from various individuals and organizations are addressed in this document. Where the same or similar comment has been raised by multiple commenters, NPS has consolidated and paraphrased the comments for brevity, and responded only once. The comments, with NPS' response, are set forth below.

1. *The Greenway Commission is interested in renewing the General Agreement it previously had with the Parkway and willing to help coordinate volunteer training, maintenance, and trail construction.*

The Blue Ridge Parkway would also like to see a signed General Agreement with the Roanoke Valley Greenway Commission to foster a spirit of cooperation and collaboration on issues of mutual benefit. Volunteer training, maintenance, and trail construction will be conducted in partnership with the Roanoke Valley Greenway Commission and we look forward to drafting an agreement that provides a framework for that partnership.

2. *Completion of the Roanoke River Greenway is our area's number one amenity and recreational goal. We were extremely disappointed to learn of the elimination of the Greenway extension and to find out that it occurred without consulting the Greenway Commission or local governments. The Roanoke River Greenway is planned, built and maintained with local resources. The Parkway provides no justification for this change, which effectively prohibits the Greenway Commission from pursuing grant funding to complete the Greenway.*

There has been no discussion of eliminating the Roanoke River Greenway and the National Park Service has no jurisdiction in matters of local funding, ownership, planning or development of greenways. Much of the land between the Roanoke River and Explore Park is not owned by the National Park Service; we do not have authority to construct or grant approval of a trail on property outside of our ownership or control. We have worked with the RVRA, and Roanoke County to identify the most appropriate route through that area.

3. *The Board of Supervisors of Roanoke County and the Council of the City of Roanoke, expresses its support for Alternative "C" of the Environmental Assessment for the Roanoke Valley/Blue Ridge Parkway Trail Plan with the following modifications:*

- a. Provide extension of the Roanoke River Greenway along the Roanoke River from the Parkway to Explore Park; exact route to be determined upon coordination with the National Park Service/Blue Ridge Parkway, the Roanoke Valley Resource Authority (RVRA), Explore Park/Virginia Recreational Facilities Authority and Roanoke County;*
- b. Include a one-year pilot project to evaluate shared use of the Chestnut Ridge Loop for hikers, equestrians and mountain bikers;*
- c. That unauthorized social trails providing public access to roads shall remain open until such time that resources are available to provide alternative access points for the citizens of the Roanoke Valley; further, that prior to the closure of Deer Trail, an unauthorized social trail, a paved connection for bicyclists be constructed through the ranger station and that hikers be permitted to continue use of the Deer Trail connection from Mountain View Road to the horse trail;*
- d. Include a trail crossing (bridge) of the Roanoke River;*
- e. Consider parking accommodations for horse trailers at Highland Road; and*
- f. Explore additional options for access and crossings at Rutrough Road due to the limited sight distances at current locations shown on maps.*

The National Park Service thanks Roanoke County and City for support of the Preferred Alternative, Alternative C. With regards to the specific proposals:

- a. Much of the land between the Roanoke River and Explore Park is not owned by the National Park Service; we do not have authority to construct or grant approval of a trail on property outside of our ownership or control. We have worked with the RVRA, and Roanoke County to identify the most appropriate route through that area.
- b. NPS staff spent much time studying and evaluating the effects of existing use (including unauthorized mountain bicycle use) on Chestnut Ridge Trail. In the professional opinion of staff the existing uses of equestrian and pedestrian (hiking) are enough for that trail system. Adding and additional new use on a system that was not designed or constructed for that use has resource and safety concerns. For that reason, the NPS has identified mountain bicycle only trails to be constructed near Explore Park.
- c. Unauthorized social trails are those trails which are creating resource damage, safety issues, and in some cases providing private restricted access to lands owned by the United States Government. The National Park Service has the authority to identify and remediate such trail damage wherever it occurs on federal property. This trail plan identifies safe, appropriate access to the Blue Ridge Parkway and its trail systems and proposes to close those trails which do not meet specified criteria. Individuals continue to be allowed to access the Blue Ridge Parkway wherever they choose; the National Park Service has an obligation to eliminate and/or rehabilitate those entry points that are unsafe or cause resource damage to park resources or become unauthorized trails. Criteria for trails and trail connections/access points are outlined in the EA.
- d. The National Park Service does not have ownership or authority of the Roanoke River. We have worked in partnership with Roanoke County and the Roanoke Valley Resource

Authority on the most safe, appropriate crossings in the area of Explore Park that are under our jurisdiction.

- e. We are working in partnership with Roanoke County and the Roanoke Valley Resource Authority on trailhead and parking options in the area of Highland Road.
- f. We are working in partnership with Roanoke County and the Roanoke Valley Resource Authority on the most safe, appropriate crossings in the area of Explore Park.