



National Park Service
U.S. Department of the Interior
Ninety Six National Historic Site
Ninety Six, SC

FINDING OF NO SIGNIFICANT IMPACT
Equestrian Management Plan / EA

Recommended:

Date

A handwritten signature in blue ink, appearing to read "John Slaughter".

2/14/19

John Slaughter
Superintendent
Southern Campaign of the American Revolution Parks

Approved:

Date

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2/27/19

Robert A. Vogel
Regional Director
Southeast Region
National Park Service

INTRODUCTION

In compliance with the National Environmental Policy Act, the National Park Service (NPS) prepared a plan and Environmental Assessment (plan/EA) to examine alternative actions and environmental impacts associated with equestrian use on the trails of Ninety Six National Historic Site (hereafter, the park). The purpose of the plan was to evaluate equestrian use and its impacts on the park's historic and natural landscapes. The plan evaluated the impacts of several alternatives, including the no-action alternative (continuation of the current equestrian trails and management policies), to assist the management team and superintendent in deciding what equestrian opportunities would be restricted or allowed in order to provide visitors with adequate and appropriate use opportunities. The plan contains guidelines and standards to govern equestrian activities within the park.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the plan and associated decision file. To the extent necessary, relevant sections of the plan are incorporated by reference below.

SELECTED ACTION AND RATIONALE FOR THE DECISION

Based on the analysis presented in the plan, the NPS selected alternative B (the NPS preferred alternative). Under the selected action, equestrian users will continue to enjoy riding on sections of the East, North, and West Boundary trails, as well as the park administrative roads, totaling approximately 4.5 miles of available trail mileage.

To manage equestrian use in a way that supports the park's desired conditions, managers will consider certain strategies. For instance, this alternative includes the implementation of a day-use (special use) permit system if the desired conditions of visitor capacity of the trails and / or the number of visitor complaints about trail use were exceeded. If the visitor capacity of the trails exceeds a combined trail capacity of 50 visitors at one time (30 equestrian users and 20 pedestrians) or if the number of complaints from trail users reaches the threshold of three per month, the park will implement a day-use permit system. These permits will allow the park to be proactive in managing and maintaining levels of visitation, ultimately ensuring visitors will have a high-quality, enjoyable experience during their trip in the park.

The park will also install a bulletin board, trash receptacles, and a permanent gate at the equestrian lot. The gate will not be an electronic / automatic one, but will still require park staff to open and close it. Parking will be available during park operating hours. Other improvements to the equestrian lot and trails will occur as staffing and funding allows or upon the formation of a Friends or volunteer group that can devote the time, funding, and people needed to work on trails.

Rationale

Over the last five years, there has been a steady increase in equestrian use within the park. This increase in equestrian use, combined with heavy rain events has resulted in an increase in erosion and other adverse resource impacts. Preventing erosion, effects to water quality, and damage to historic landscapes and trails while providing for a variety of recreational, inspirational, and educational uses are high priorities for park staff.

Of the alternatives considered, the selected alternative will enable the NPS to best meet the purpose of the plan. The selected action will continue to allow equestrian use as a recreational opportunity, while stipulating management strategies that, when employed, will mitigate the effects from such use on the park's resources. The selected action best meets the goals identified in the plan in that it:

- Accommodates equestrian use of the park and enhances the experience of the horse riding community.
- Protects and preserves the cultural and natural resources within the park's boundaries.
- Evaluates equestrian user capacity by developing indicators and thresholds.

The selected action is consistent with NPS management policies and government-wide mandates.

MITIGATION MEASURES

The selected action incorporates a number of mitigation measures intended to protect park resources, by avoiding or reducing impacts from equestrian use. The plan incorporates mitigation measures that will allow the park to best meet the goals and desired conditions. Specific mitigation measures and other information about indicators, thresholds and monitoring are all listed in appendix A.

FINDING OF NO SIGNIFICANT IMPACT

Council on Environmental Quality regulations at 40 CFR section 1508.27 identify 10 criteria for determining whether the selected alternative will have a significant effect on the human environment. The NPS planning team reviewed each of these criteria and determined that there will be no significant direct, indirect, or cumulative impacts under any of the criteria.

Based on the professional judgment of the NPS staff, the selected action will have a minimal effect on park resources resulting from equestrian use within the park. Impact topics that were analyzed in the plan include cultural resources, soils, vegetation, water quality, and visitor use and experience.

Cultural Resources

As described in the plan, the selected action will have a minimal effect on the park's cultural resources. Currently, no archeological resources or historic structures are documented in the vicinity of the trails where equestrian use has or will occur, or within the equestrian lot. Park staff will continue to protect any known cultural resources. Park staff will also continue to mitigate adverse impacts to cultural resources as a result of visitor use through visitor education and trail engineering.

Soils

As with any recreational use, there will be some level of impacts to soils and vegetation. These impacts include erosion, soil compaction, trampling and root exposure. The soils in the park have suffered from severe erosion since European settlement, and the region retains little topsoil. Controlling erosion related to equestrian use on the trails is the main management concern associated with the soils. More soil erosion can lead to temporary increased sedimentation in water resources. Trails located on ridgetops and upper slopes exhibit the greatest erosion. The terrain of the park is relatively flat, averaging approximately 500 feet in elevation, which will lead to less erosion. Other impacts to soils and vegetation

from equestrian use will be mitigated by trail engineering and maintenance, as well as education of users, and enforcement of regulations. Finally, the affected soil types are common across the region, and ongoing impacts would not diminish soil function in the park.

Vegetation

As described in the plan, the selected action will have a minimal effect on the park's native vegetation. The selected action will cause some adverse impacts when trail users leave the designated trail (typically to avoid mud holes or exposed rocks/roots) and trample vegetation, which then leads to plant loss. There is also the possibility that invasive plant species, which already exist in the park, may spread. Furthermore, new invasive species could be introduced into the park by equestrian use. Some additional adverse impacts are anticipated from the installation of a kiosk and trash cans at the equestrian lot under the selected action; however, the installation of these facilities will not substantially affect the spatial extent, integrity or sustainability of native plant species and diversity of species composition. Impacts to vegetation will be adverse but will not likely be significant because there will not be a change in species abundance, distribution, and no population level effects. These effects are expected to be mitigated by the same trail construction and maintenance measures identified under soils.

Water Quality

The selected action will have a minimal effect on the park's water quality. The park's water resources consist of three streams, the Star Fort Pond, and an estimated 14.7 acres of wetlands. Under the selected action, equestrian use occurs on trails away from the majority of wetland areas. As mentioned under the soils, equestrian use can lead to erosion, higher sediment yields, increased turbidity, less aquatic plant photosynthesis as well as less oxygen in the water, reduced food supplies, and impacts on fish gill function. Mitigation measures and management strategies listed in the plan—such as closing the trails after prolonged and / or heavy periods of rain, trail design, repair and rehabilitation—would help to minimize the adverse impacts to water quality from equestrian use. The impacts resulting from erosion are expected to be relatively small when compared to the overall water quality, functions, and values of the waters throughout the park. Furthermore, the primary source of *E. coli* (which commonly exceeds water quality standards following rainfalls) is attributed to agricultural activities that occur upstream of the park. Finally, the impacts from the selected action will not affect the integrity of the resource in a meaningful way because of the natural capacity of the watershed to infiltrate and filter water and because the project area represents a small fraction of the total watershed.

Visitor Use and Experience

Per the selected action, visitors will continue to have access to the 4.5 miles of designated equestrian trails and 9.5 miles of hiking trails within the park. Pedestrian users will continue to enjoy more miles of trails than equestrian users, and there will continue to be adverse impacts to equestrian users by allowing them on fewer miles. The modest improvements to the equestrian lot (bulletin board, trash receptacles, and a permanent gate) will improve not only the equestrian users' experience, but also any visitors who access the lot. If the visitor capacity or number of complaints from trail users reaches the set threshold, and the park implements a day-use permit system, it will have both beneficial and adverse impacts on the visitor experience. Beneficial impacts will include improved visitor experience for pedestrians, reduced impacts to the natural resources by limiting the maximum number of people on trail at one time, and the timing and distribution of riders could be more evenly spread out to reduce congestion during peak rides.

Adverse impacts could include the inconvenience of obtaining a permit, reduced spontaneity for a visit to the park, potential for some to be unable to receive a permit, and the visitor perception that the park is less easy to visit.

CONCLUSION

As described previously, the selected action does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement. The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of the National Environmental Policy Act.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this project and, thus, will not be prepared. Appendix B contains the non-impairment determination for the selected alternative.

APPENDIX A. MITIGATION MEASURES ASSOCIATED WITH THE SELECTED ALTERNATIVE

Indicators translate the broad description of desired conditions into measurable attributes (i.e., equestrian users at one time on the trails, number of visitor-created trails) that can be tracked over time to evaluate change in resources or conditions that relate to visitor experience. They are a critical component of the visitor use management framework. Thresholds that represent the minimum acceptable condition for each indicator were assigned, taking into consideration the qualitative descriptions of the desired conditions, data on existing conditions, relevant research studies, and staff management experience. Although defined as “minimally acceptable,” thresholds still represent acceptable conditions. In addition, establishing thresholds does not imply that no action would be taken prior to reaching the threshold. Thresholds identify when conditions are about to become unacceptable and accordingly serve as a “line in the sand,” letting managers and the public know that corrective action must be taken to keep conditions acceptable so that progress toward desired conditions can be achieved over time.

The following mitigation measures will be applied to avoid or minimize potential adverse impacts associated with the selected action and to ensure Ninety Six National Historic Site’s cultural and natural resources are protected.

Indicator Topic: Archeological and Cultural Resources

Indicator: *Number of reported or discovered damage to archeological sites and cultural features related to equestrian use.*

Thresholds:

- No more than one reported or documented incident of damage to archeological sites related to equestrian use annually.
- No more than one reported or documented incident of damage to cultural features (primary interpretive features (e.g., Gouedy Trading Post Complex, Colonial Village of Ninety Six, Star Fort, Stockade Fort and Related Features, etc.) related to equestrian use annually.

Monitoring: The park will monitor this indicator in a variety of ways. Park personnel such as law enforcement as well as equestrian users will submit incident and case reports. Park staff and/or visitor reports will prompt formal archaeological condition assessments conducted by a professional NPS archeologist. The park is already measuring changes in conditions through condition assessments and the Facility Condition Index (which rates the condition of a facility or asset at a particular point in time using a numeric rating system) from Facility Management Software System on 5-year intervals. Archeological sites are currently inspected at 5- and 10-year intervals depending on the resource.

Management Strategies and Mitigation Measures:

- Continue formal monitoring at 5- and 10-year intervals and have a higher frequency of condition assessments completed in sensitive areas with high visitor use (as recorded by trail cameras).
- At first occurrence of an incident, the park will increase informal monitoring frequency.

- Educate visitors on the sensitivity of resources and the need to protect historical and cultural sites. This could be completed through educational signs or directional signage for visitors to stay on trails.
- Target education to equestrian users that are accessing areas with historical and cultural sites. This could be completed throughout educational pamphlets and/or waysides focusing on historical horse use at the site.
- Increase trail watch by using predominant user group as site stewards.
- Establish more regular communication mechanisms to understand traditional cultural resource locations and activities.
- Conduct an archeological site testing and make recommendations.
- Cultural resource experts conduct damage analysis.
- Prioritize documentation of resources in high visitor use areas. Criteria might include trail location, visibility, current integrity, site boundary, and previous assessments. Trails could have buffer zones from 0-20 meters where resources are considered on trail 20–40 meters, and 40–60 meters where resources are considered off-trail.
- Increase ranger presence or patrol.
- Increase enforcement and documentation.
- Create physical barriers.
- Conduct baseline assessment and survey prior to opening new trails.
- Maintain an updated GIS map of surveys and assessments that occur to enhance monitoring efforts and locate known sites for new trail considerations, signage, public events, and others.
- Reroute trails and examine potential temporary closures. Area closures would only be considered after a range of management strategies have been implemented and have not been effective.

Indicator Topic: Visitor Complaints

Indicator: *Number of complaints related to trail use*

Threshold: No more than three validated complaints per month in the same area.

Monitoring: The park will document complaints from visitors including time, location, and type of complaint. This documentation system could take many forms (e.g., visitor use forms that will provide feedback to park managers about visitor experiences, opportunities, and issues). The park will also explore new ways to seek input from visitors. This monitoring provides feedback that is important for managers to ensure desired conditions are maintained.

Management Strategies and Mitigation Measures:

- Develop a public information effort about the desired conditions for the park, and provide information about the actions the park is taking to achieve those conditions. Information could include appropriate visitor behaviors, including proper trail etiquette and the rationale behind not allowing particular activities or discouraging specific behaviors. This information could be distributed through direct visitor contact, park publications (online and printed), and wayside exhibits.
- Investigate and validate the complaint and determine if it requires further action. If safety related, take action immediately.

- Work with the affected users to understand the root of the conflict; create understanding between users; if possible, change future behavior; and resolve the conflict.
- Create and post trail signs or informational brochures explaining trail etiquette (e.g., who yields to whom).
- Consider limiting a particular type of use on certain trails, segregating uses, or changing the design of existing trails to prevent repeat conflicts.
- Develop a permit system for trails to help minimize user conflicts related to the amount of use.

Indicator Topic: Trail Conditions

Indicator: *Change in trail conditions (ruts, erosion, width, depth, tread)*

Threshold:

- No more than 10% increase in any of the following areas: eroded areas, trail width, and/or trail depth at any place on the trail.
- No more than 1% increase in any of the following areas: eroded areas, trail width, and/or trail depth for historic roadbeds.

Monitoring: Park staff is committed to 100% review of the trails—once a year—to include an inventory and condition assessment. Provided below is the park staff’s outline for monitoring trail conditions. In the future, the park could leverage partnerships and volunteers to document conditions on trails to determine when and where trail condition assessments are completed and needed.

Park Staff Outline:

- Establish baseline conditions (include user-reported incidents).
- Initiate an annual trail assessment and semi-annual trail assessment, if needed, for trails of concern. Document trail condition assessments in spring, and assess areas of concern in fall.
- Conduct periodic patrols of trails.
- Continue to close trails after the precipitation levels noted below and visually inspect trails prior to opening for public use. The visual inspection will guarantee that no further channeling and/or rutting has occurred and that archeological sites have not been exposed.
 - 1” — trails will be closed for 24 hours
 - 1 – 2” — trails will be closed for 48 hours
 - 2+” — trails will be closed for approximately 72 hours or more, depending on ensuing weather events.

Management Strategies and Mitigation Measures:

- Trail construction, repair, and rehab will follow U.S. Forest Service trail standards using volunteer and/or friends groups to assist the park with trail maintenance.
- Strategies to manage trail widening:
- Establish trail borders with rocks, logs, or fencing.
- Advertise areas of muddiness, erosion, and excessive rockiness to contain the lateral spread of traffic along particular areas.
- Encourage visitors to stay to the center of the trail.

- Encourage equestrian users to ride single file in areas where trail widening is occurring.
- Limit equestrian use group sizes, break up groups, or create a one-way flow of use.
- Strategies to manage excessive soil loss:
- Hardening treads through the application of surface amenable to horse use and accounting for archeological resources.
- Outsloped treads (i.e., the tread is lower on the outside or downhill side of the trail to encourage natural water drainage).
- Drainage control structures.
- Sustainable (re)design.
- Installing boardwalks and structures.
- Limit equestrian use temporarily or permanently to alleviate trail degradation.
- Potential temporary or permanent trail or area closures.
- Reroute, close trails, or harden trails to protect sensitive resources or to prevent long term-damage to trails, habitats when excess water is present, and improve visitor safety and experience.

Indicator Topic: Invasive Species

Indicator: *Number of new occurrences of invasive species (new and old) along trails in equestrian areas*

Threshold: No more than one new occurrence of a new species if it is an ecosystem modifying species or species that pose threats to human health and safety on the equestrian trail system.

Monitoring: Currently, the National Park Service is periodically monitoring for invasive species and treating known areas containing privet, kudzu, and wisteria. This will continue on a quarterly basis. The National Park Service will also begin periodically sampling the feed of equestrian users. There is a need to identify the current spread of invasive species so that identifying new occurrences is easier.

Management Strategies and Mitigation Measures:

- Provide education related to invasive species (e.g., identification, on-site impacts) and possible vectors associated with equestrian use (e.g., in the trailer, hay), leverage site stewards.
- Provide early detection workbooks to visitors from Southeast Exotic Plant Management Team. Encourage visitors to report invasive species occurrence to park staff.
- Improve partnerships and collaborative action plans with other entities concerned with invasive species; leverage site stewards.
- Restore disturbed areas and reintroduce native species.
- Remove nonnative species via spraying, cutting, and chemically treating stumps, and any other manual or biological control methods.
- Establish Special Ecological Areas to exclude invasive plan from designated areas.
- Encourage and/or require weed-free feed for all equestrian users.
- Increase trail patrols, inspections, and subsequent maintenance. Encourage on-trail travel.
- Provide wash stations to wash shoes and gear with signs explaining the purpose.
- Temporarily or permanently close areas if invasive species are detected to decrease the risk of further spread.
- Reduce use levels.

Indicator Topic: Parking Lot Congestion

Indicator: *Number of cars in the equestrian parking lot at one time*

Threshold: No more than five vehicles with trailers in the equestrian parking lot at one time.

Monitoring: The park currently has a pneumatic tube counter at the entrance to the parking lot and also tracks the number of reports of vandalism or break-ins. In the near future, the park could install an iron ranger to collect visitor reports. The park could also install trail cameras that date- and time stamp photos or conduct periodic observational monitoring to further understand use at the equestrian lot. Monitoring of this indicator using existing methods and employing new techniques will provide important information to managers about existing use and potential issues.

Management Strategies and Mitigation Measures:

- Enforce parking and access restrictions, as well as site management (signage, delineation of spaces, curbing, paving, revegetation, blockades, fences) to resolve over-parking and visitor-created parking.
- Increase enforcement of endorsed parking only and during after-hours.
- Install permanent gate.
- Consider electronic gate access.
- Require specific-size horse trailers.

APPENDIX B: NON-IMPAIRMENT DETERMINATION

The NPS Organic Act of 1916 and the General Authorities Act of 1970 prohibit impairment of park resources and values. The NPS Management Policies 2006 use the terms "resources and values" to mean the full spectrum of tangible and intangible attributes for which the park is established and managed, including the Organic Act's fundamental purpose and any additional purposes as stated in the park's establishing legislation. The impairment of park resources and values may not be allowed unless directly and specifically provided by statute. The primary responsibility of the National Park Service is to ensure that park resources and values will continue to exist in an unimpaired condition that will allow people to have present and future opportunities to enjoy them.

A determination of impairment is made for each of the resource impact topics carried forward and analyzed in the plan. Impairment is an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. An impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park; or
- identified as a goal in the park's general management plan or other relevant NPS planning documents.

An impact will be less likely to constitute impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated.

The NPS-selected action is the preferred alternative (alternative B) in the plan. A non-impairment determination was completed for this alternative. The resource impact topics analyzed for the selected alternative include cultural resources, soils, vegetation, water quality, and visitor use and experience.

Cultural Resources

The park's purpose, as identified in its enabling legislation, is to preserve and commemorate the area's unique historical significance associated with the settlement of English Colonies, as well as the southern campaign of the American Revolutionary War. As described in the plan, the selected action will have a minimal effect on the park's cultural and historic resources. The Southeast Region Cultural Resource Program completed a pedestrian survey of the equestrian trails as they exist under the selected action and determined that equestrian use on these trails did not significantly impact any archaeological sites. Currently, no archeological resources or historic structures are documented in the vicinity of these trails or the equestrian lot. Park staff will continue to protect any known cultural resources, as well as protect any new resources discovered as a result of the Southeast Region Cultural Resource Program surveys or artifact exposure from equestrian use. Park staff will also continue to mitigate adverse impacts to cultural resources as a result of visitor use by educating visitors about the resources and how to avoid impacting them, engineering trails to avert damage to cultural resources from equestrian and pedestrian use, and enforce regulations related to visitor use and preserving cultural resources. Because the selected action occurs outside of the park's historic zone, and park staff will protect cultural resources through management strategies and mitigation measures, there will be no impairment to cultural resources.

Soils

While the park's natural resources are not identified as fundamental resources or values, it is recognized that the park possesses an array of natural resources such as rare plant and tree species, and an abundance of animal species. The park offers a number of opportunities for visitors to experience both the historic and natural resources.

Decades of recreational use on the existing trails has contributed to impacts to the soil. Equestrian users ride on the administrative roads within the park and will continue to do so per the selected action. Motorized use on these roads causes more adverse impacts to soils, vegetation, and water quality than does equestrian use. The approximately 1-acre area designated as the equestrian parking lot has been improved in the past with gravel limited to the entrance/exit of the park, which had an adverse impact on the soils in this area. Some additional adverse impacts are anticipated from the installation of a kiosk and trash cans at the equestrian lot under the selected action. When the negative impacts of the selected action were combined with those from past, present, and reasonably foreseeable actions, the total cumulative impact on soils will continue to be adverse but will not likely be significant, and therefore there will not be impairment on park soils.

Vegetation

Vegetation that once grew directly in the path of the backcountry trails and parking areas has been obliterated by pedestrian and equestrian use (see note under soils about administrative motorized use of the roads). Loss of and disturbance to vegetation within the park has also occurred as a result of prior agricultural use, logging, fire suppression, and mowing of open fields. Impacts to vegetation will be adverse but will not likely be significant because there will not be a change in species abundance, distribution, and no population level effects. These effects are expected to be mitigated by the same trail construction and maintenance measures identified under soils. Furthermore, the park already monitors and controls invasive exotic species and will work to eradicate any new populations associated with equestrian use. Therefore, there will be no long-term meaningful change to these resources on the equestrian use trails or within the footprint of the equestrian parking lot. Because the selected action would not result in changes to species abundance throughout the park, and mitigation measures will be implemented to prevent the spread of invasive species, no impairment of the vegetation will occur.

Water Quality

The primary source of *E. coli* (which commonly exceeds water quality standards following rainfalls) is attributed to agricultural activities that occur upstream of the park. Furthermore, the impacts from the selected action will not affect the integrity of the resource in a meaningful way because of the natural capacity of the watershed to infiltrate and filter water and because the project area represents a small fraction of the total watershed. Sustainable trail design and trail closures will also help to minimize adverse impacts. Because the adverse impacts, when compared to the impacts as a result of activities outside of the park, are minor and will be minimized through trail design and maintenance, there will be no impairment of the water quality.

Visitor Use and Experience

Per the selected action, visitors will continue to have access to the 4.5 miles of designated equestrian trails and 9.5 miles of hiking trails within the park. Pedestrian users will continue to enjoy more miles of trails than equestrian users, and there will continue to be adverse impacts to equestrian users by allowing them on fewer miles. The modest improvements to the equestrian lot (bulletin board, trash receptacles, and a permanent gate) will improve not only the equestrian users' experience, but also any visitors who access the lot. A special use permit system will have both beneficial and adverse impacts on the visitor experience. Beneficial impacts will include improved visitor experience for pedestrians, reduced impacts to the natural resources by limiting the maximum number of people on trail at one time, and the timing and distribution of riders could be more evenly spread out to reduce congestion during peak rides. Adverse impacts could include the inconvenience of obtaining a permit, reduced spontaneity for a visit to the park, potential for some to be unable to receive a permit, and the visitor perception that the park is less easy to visit. Because the adverse impacts to the visitor experience will be minimal, and because there will be beneficial impacts to visitors under the selected action, there will be no impairment to the visitor experience.

CONCLUSION

In conclusion, as guided by this analysis and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the selected action. The National Park Service has determined that implementation of the selected action will not constitute an impairment of the resources or values of Ninety Six National Historic Site. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the plan, and the professional judgment of the decision maker guided by the direction of NPS Management Policies 2006.

APPENDIX C: RESPONSES TO CONCERNS

No substantive comments or comments that necessitated changes to the plan/EA were received during the public commenting period. This appendix includes a response to one non-substantive comment identified as needing clarification.

- Concern: “At the bottom of page 1 there is a reference to the 2014 Foundation Document. The reader should be told how to obtain a copy of it or to view it online.”
- Response: The 2014 Foundation Document overview can be found online at: https://pubs.etic.nps.gov/Etic/NISI_463_128487_0001_of_0004.pdf or by requesting a copy from the park.