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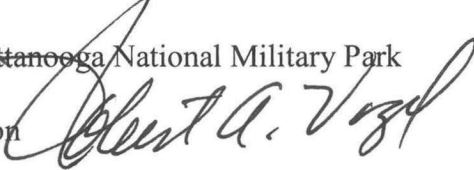
NATIONAL PARK SERVICE

Southeast Regional Office
Atlanta Federal Center
1924 Building
100 Alabama St., SW.
Atlanta, Georgia 30303

SEP 13 2019

Memorandum

To: Superintendent, Chickamauga Chattanooga National Military Park

From: Regional Director, Southeast Region 

Subject: Finding of No Significant Impact (FONSI) for the Proposed Bicycle Use, Jackson Gap and John Smartt Trails Environmental Assessment at Chickamauga Chattanooga National Military Park in Dade County, Georgia

The signed FONSI for the Proposed Bicycle Use on Jackson Gap and John Smartt Trails project is enclosed.

Please contact Ben West, Chief of Planning and Compliance Division at 404-507-5700 if you have any questions.

Attachment



National Park Service
U.S. Department of the Interior

Chickamauga Chattanooga National Military Park
Georgia and Tennessee

FINDING OF NO SIGNIFICANT IMPACT
Proposed Bicycle Use
Jackson Gap and John Smartt Trails

Recommended:



Brad Bennett
Superintendent, Chickamauga Chattanooga National Military Park

8/22/2019

Date

Approved:



Robert A. Vogel
Southeast Region, National Park Service

9/13/19

Date

INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to evaluate the environmental impacts associated with the proposed bicycle use on Jackson Gap and John Smartt Trails. The project is needed to allow mountain bicyclists to connect to the regional multiuse trail system from Cloudland Canyon State Park through Chickamauga Chattanooga National Military Park on Jackson Gap and John Smartt trails to Chattanooga, Tennessee.

The purpose of this proposal is to evaluate whether to allow bicycle use on the Jackson Gap Trail and the upper section of the John Smartt Trail within the park and whether such use can be accommodated without causing harm to park resources or conflicts among users. The Jackson Gap and John Smartt trails are located in the southeast section of Lookout Mountain Battlefield, adjacent to the boundary of the Covenant College Campus. The regional multi-use trail system connects to the Jackson Gap Trail at the southern boundary of the park, which continues approximately 0.90 mile to the three-way intersection of Jackson Gap, Bluff and John Smartt trails. The John Smartt Trail continues for approximately one mile until its intersection with the Upper Truck multi-use trail. The Jackson Gap and John Smartt trails combined are a total of 1.91 miles. The trails are located in Dade County, Georgia, and are part of the Lookout Mountain Battlefield Trail System.

The Jackson Gap and John Smartt trails are existing, well-constructed hiking trails within a natural zone of the park. They are single track with a width of 2-4 feet and have a natural trail surface. These trails have existed for many decades in good condition without a high frequency of maintenance.

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

The EA was available for public review from May 6, 2019 through June 5, 2019. A total of 551 pieces of correspondence were received during the comment period. No substantive comments were received. The proposed action and impact analysis did not change as a result of comments received. Support for the Proposed Action was expressed in 524 pieces of correspondence.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Based on the analysis presented in the EA, and after considering public comments, the NPS selected Alternative B for implementation – *Allow Mountain Bicycle Use on Jackson Gap Trail and upper Section of the John Smartt Trail* (the NPS preferred alternative).

Under the selected alternative, Alternative B, the NPS will pursue a bike rule to allow bicycle use on a portion of Jackson Gap and John Smartt trails (refer to figure 3 in the EA). The NPS will install signs at key locations for safety purposes and to alert users to avoid impacts to natural resources and historic structures. Trail width and trail tread will remain the same as they currently are on both trails: single-track trail with a width ranging from 2-4 feet with natural trail tread. The new trail designation will connect to the existing bike traffic on Upper Truck Trail,

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which has external bicycle access on the Tennessee side of the park, but is currently without a bicycle outlet on the Georgia side.

The International Mountain Bicycling Association's trail difficulty rating system is used to categorize the technical difficulty of recreational trails. The rating system helps trails users to make informed decisions, encourage visitors to use trails that match their skill level, manage risks and minimize injuries, while improving the outdoor experience for a wide variety of visitors. The rating of the Jackson Gap and John Smartt Trails will be "Black Diamond" due to the steep grade and difficulty of these trails.

Signs and educational materials will be made available at trailheads, at the intersection of the John Smartt Trail and Upper Truck Trail, and near switchbacks prior to allowing bicycle use on the trails. See Figure 3 of the EA for a map of the Lookout Mountain Trails and map of locations for proposed sign installation.

The signs and educational materials will provide guidance on proper trail etiquette. The signs and educational materials will proactively address the potential for user conflict and establish user norms. Signs will be installed at trailheads, trail intersections, and along the trails as needed to convey the trail regulatory and safety messages. These messages will inform visitors of route names, trail etiquette, and the designated trail users. The signs will also provide safety information including trail direction and appropriate practices for yielding to others. Trail signs will be small scale, low stature, natural metal, post-mounted with incised letters; scale and placement will minimally affect the natural landscape and installation will be in disturbed locations within the trail bed. Kiosks at trailheads will be based on standard NPS designs that are appropriate for the selected location and will be installed in strategic locations.

Park staff will continue to assess the Jackson Gap Trail and John Smartt Trail during annual condition assessments, on regular patrols, and as reports are received concerning fallen trees or other hazards. Crews will continue to clean all drainages and culverts, remove loose rocks and debris, and trim/prune vegetation as necessary. There will be monthly monitoring by volunteer trail rovers to assist in identifying any additional maintenance that may be required; however, major changes to routine maintenance is not anticipated. Maintenance will continue on an as-needed basis.

Allowing bike use on the Jackson Gap Trail and the upper section of the John Smartt Trail will not set a precedent for allowing future bike use on other trails that are not designated for bicycle use. Any additional considerations for bicycle use on trails or trail sections within the park will be subject to a separate NEPA evaluation by the NPS.

If trail users indicate that conflicts exist among users, the NPS will implement management strategies described below:

Management Strategies

The Selected Alternative will incorporate monitoring and management strategies to address potential visitor use conflicts and resource impacts. Monitoring and evaluation are important in determining whether management actions are achieving objectives to minimize impacts to park

resources and minimize user conflicts. For instance, if results from monitoring indicate that conflicts between bicyclists and hikers are increasing, management actions may be necessary to better educate visitors or to control use. Park management will use information as it becomes available to alter management actions. It is an iterative process that requires selecting and implementing management actions, careful monitoring, comparing results with objectives, and using feedback to make future management decisions. Park management recognizes the importance of continually improving management techniques through flexibility and adaptation instead of adhering rigidly to a standard set of management actions.

The management strategies framework for the Jackson Gap Trail and the upper section of the John Smartt Trail focuses on identifying and managing user conflicts and resource impacts that may arise from bicycle use. Following implementation, indicators of use and resource conditions will be monitored to track changes in conditions. Conditions will be assessed and compared to thresholds, as described below. Thresholds that are exceeded will trigger management changes to restore conditions and the desired state.

The park superintendent will exercise discretion to temporarily close bicycle access to these trails following a rain event to address issues concerning erosion. Temporary trail closures will allow trails to return to sustainable conditions before allowing continued bicycle use.

The following management indicators and related actions are proposed to address any potential visitor use conflicts or resource impacts:

Indicator	Threshold	Management Action
Bicyclist Accident – involving bicyclist only with injuries	1st accident	Initiate an investigation to determine cause of accident, suspend bicycle use until cause determined.
Bicyclist Accident – involving bicyclist only with injuries	2nd accident within a year	Evaluate cause. If a pattern of similar cause, suspend bicycle use until investigation and recommendation can be made regarding appropriate corrective action. Increase education.
Bicyclist Accident – involving bicyclist only with injuries	3rd accident within a year	Evaluate root cause and take appropriate corrective action, which may include elimination of bicycle use.
Visitor Conflicts with Bicyclist – Accident involving bicyclist and hiker	1st accident	Park rangers initiate an investigation to determine the cause of all accidents reported. Depending on the situation, bicycle use may be suspended until cause is determined and investigation is complete.
Visitor Conflicts with Bicyclist – Accident involving bicyclist and hiker	2nd accident in same location of trail within the same year	Evaluate root cause and take appropriate corrective action. Increase education.
Visitor Conflicts with Bicyclist – Accident involving bicyclist and hiker	3rd accident in same location of trail within the same year	Initiate reduction of bicycle use days / alternate days of bicycle use with hiking only days. Recruit bicycle rovers to assist with education.
Visitor Conflicts with Bicyclist – Accident involving bicyclist and hiker	4th accident in the same section of the trail within the same year	Consider elimination of bicycle use.
Fatality to Bicyclist / Hiker	1st fatality	Evaluate root cause and take appropriate corrective action, which may include elimination of bicycle use.
Fatality to Bicyclist / Hiker	2nd fatality	Close trail to bicycle use. Revert to prior designation of hiking- only trail.
Written complaints from trail users about trail use conflicts with bicyclist	1) First verifiable complaint within a year	Each written complaint will be investigated by law enforcement to determine appropriate follow-up action which may include one or more of the following: Increase law enforcement staff presence on trail, request increase in trail rovers for monitoring, and/or increase education.
Written complaints from trail users about trail use conflicts with bicyclist	2) Third complaint occurs regarding same location of trail within a year	Increase law enforcement presence on trail, request for trail rovers presence on trail, and increase education with stakeholders, partners, and neighbors.
Written complaints from trail users about trail use conflicts with bicyclist	3) Five or more verifiable complaints within a year	Increase education, engage partners, and increase monitoring. Increase law enforcement by issuing warning citations, 2nd offense written citation with fee. Place trail advocates to increase presence on trail and increase monitoring.
Written complaints from trail users about trail use conflicts with bicyclist	4) Five or more verifiable complaints within three years	In addition to above education and enforcement actions, implement reduction of bicycle use days.

Rationale

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Proposed Bicycle Use Jackson Gap and John Smartt Trails August 2019Page 5

Alternative B was selected because the NPS determined that mountain bicycle use on Jackson Gap Trail and the upper Section of John Smartt Trail will have a high likelihood of successfully avoiding and minimizing impacts on park resources and visitors, while allowing bicycle use.

The Jackson Gap and John Smartt trails are existing, well-constructed hiking trails within a natural zone of the park. They are single track with a width of 2-4 feet and have a natural trail surface. These trails have existed for many decades in good condition without a high frequency of maintenance. Other than infrequent maintenance to the trails, it is believed by current park staff that there have not been any ground-disturbing activities to this area of the park since the development of the trails in the 1930s.

The park receives ongoing feedback regarding its trail network. The park has received multiple requests to allow biking on park trails and specifically on the Jackson Gap Trail and the upper section of the John Smartt Trail. These requests have been made in person over the past several years. In response to the ongoing feedback and requests from the public, the park initiated this EA to consider opening the Jackson Gap Trail and part of the John Smartt Trail to bicycle use.

The proposed designation is consistent with the Lookout Mountain Battlefield General Management Plan Amendment (GMPA), and the 2016 Jackson Gap Multiuse-Conversion Plan, developed in partnership with the park, the Chattanooga chapter of the Southern Off Road Bicycle Association (SORBA) and Lookout Mountain Conservancy. The stakeholders envision the park as a critical centerpiece in a growing regional trail system that allows mountain bikers to ride from Chattanooga, Tennessee, to Cloudland Canyon State Park in Georgia. Currently only hikers have access to the full length of this two-state trail.

In the past,

- Bicyclists have accessed the Upper Truck Trail from the Guild Trail, which is part of this regional bicycle trail system owned by the Lookout Mountain Conservancy in Chattanooga, Tennessee. However, when they reached the end of the Upper Truck Trail, they had to turn around and exit the park where they entered.
- Mountain bikers starting at Cloudland Canyon State Park on the regional trail system in Georgia rode from that park, along the Cloudland Connector Trail, to Nick-a-jack Road, to Hinkle Road, to Lulu Lake Road, to the Chattanooga Connector Trail that terminated at Covenant College in Walker County, Georgia, on the park boundary.

By allowing mountain bicycle access on the Jackson Gap Trail and the upper portion of the John Smartt Trail, riders will be able to ride the entire 21 miles from Cloudland Canyon State Park to Chattanooga, Tennessee.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. As part of the Proposed Action, Alternative B includes measures to avoid and minimize potential impacts to the Park's resources. These measures include issuing citations for off-trail use, increasing monitoring, increasing education of regulations, enforcing

regulations, re-evaluating trail design and or requesting trail advocates assistance with establishing a defined trail edge by barricading shortcuts, and increasing the number of hours the trail is closed to bicycle use following rain events. The full list of management indicators and related actions to address potential visitor use conflicts or resource impact can be found on pages 13 and 14 of the EA.

FINDING OF NO SIGNIFICANT IMPACT

The potential for significant adverse impacts have been analyzed, taking into account the context and the relevant intensity considerations required by CEQ Regulations at 40 CFR 1508.27(b), including: impacts that may be both beneficial and adverse; whether the action is related to other actions with individually insignificant but cumulatively significant impacts; and the degree to which the proposed action affects public health or safety. As described below, the National Park Service has determined there will be no significant adverse impacts to park resources as a result of implementing the selected action.

Based on the professional judgment of NPS staff, the selected action will have a minimal effect on park resources resulting from bicycle use on the Jackson Gap and John Smartt trails within the park. Impact topics that were analyzed in the plan include cultural resources, soils, and vegetation. The selected action will add approximately 200 bicycle users annually to the total number of recreational visitors on these trails. Park staff anticipates this increased use will not have a measurable impact on historic structures within this area. Although bicycle users may go off-trail, the retaining walls and drainages will be monitored more frequently by park staff to ensure these resources are protected. The park will implement management strategies to minimize resources impacts that include issuing citations for off-trail use, increasing monitoring, increasing education, enforcement of regulations, re-evaluating trail design, and/or requesting trail advocates' assistance with establishing a defined trail edge by barricading shortcuts. The increased impacts to soils from bicycle use on the trails are anticipated to be small and overall the effects on soil for alternative B will be minor erosion due to rain events. Over the long term, effects on soils due to erosion will depend on the frequency of rain events; however, the park will implement management strategies such as temporarily closing the trails for bicycle use following rain events to allow the stormwater to drain and the trail tread to dry out. Temporary trail closures to bicycle users will prevent ruts from developing and will allow the trail to return to sustainable conditions before allowing continued bicycle use. There may be an increased disturbance to vegetation due to bicycle use if bicycle users go off-trail; however, park staff will continue to monitor trail use and condition to ensure minimal effect to vegetation. Although individual plants may be affected if bicycle users go off-trail, there will be no impacts to vegetation at the community level as a result of implementation of the selected alternative. Given the steep and challenging terrain on this 1.9-mile trail section, park staff anticipates a relatively low number (200) of bicycle users on these trails annually and therefore impacts to vegetation are expected to be localized and small.

Alternative B was selected because it accommodates increased recreational use requested by visitors and stakeholders, as well as protects and preserves cultural and natural resources within the boundary of the park.

There will be no significant impacts on public health, public safety, or unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law.

CONCLUSION

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

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

APPENDIX A
NON-IMPAIRMENT DETERMINATION FOR
BICYCLE USE ON JACKSON GAP AND JOHN SMARTT TRAILS

THE PROHIBITION ON IMPAIRMENT OF PARK RESOURCES AND VALUES

National Park Service (NPS) *Management Policies 2006*, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the NPS the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the NPS must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the NPS. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

WHAT IS IMPAIRMENT?

NPS *Management Policies 2006*, Section 1.4.5, *What Constitutes Impairment of Park Resources and Values*, and Section 1.4.6, *What Constitutes Park Resources and Values*, 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.

Section 1.4.5 of *Management Policies 2006* states:

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would 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 to opportunities for enjoyment of the park, or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.

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

Per Section 1.4.6 of *Management Policies 2006*, park resources and values that may be impaired include the following:

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- The park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;
- Appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- The park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- Any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act unless the NPS was in some way responsible for the action.

HOW IS AN IMPAIRMENT DETERMINATION MADE?

Section 1.4.7 of *Management Policies 2006*, states, "[I]n making a determination of whether there would be an impairment, an NPS decision maker must use his or her professional judgment." This means that the decision maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969; consultations required under Section 106 of the National Historic Preservation Act; relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.

Management Policies 2006 further defines "professional judgment" as follows:

...a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities in relation to the decision.

NON-IMPAIRMENT DETERMINATION FOR THE SELECTED ALTERNATIVE

This determination on impairment has been prepared for the selected alternative (Alternative B), described on pages 9 through 14 of the Proposed Bicycle Use – Jackson Gap and John Smartt Trails *Environmental Assessment*, May 2019. A non-impairment determination is made for soils, vegetation, and historic structures, which were analyzed for the preferred alternative.

Finding of No Significant Impact

Non-Impairment Findings for Soils:

Under alternative B, the Jackson Gap and John Smartt trails will continue to allow hiking and will open the two trails to mountain bicycle use. There may be an increase in soils disturbance due to bicycle use and the potential for development of social trails in the area. Soils on trails are susceptible to a variety of impacts.

The effects on soil for alternative B will be minor erosion due to rain events. Over the long term, effects on soils due to erosion will depend on the frequency of rain events. The park will implement management strategies such as temporarily closing the trails for bicycle use following rain events to allow the stormwater to drain and the trail tread to dry out. Temporary trail closures to bicycle users will prevent ruts from developing and will allow the trail to return to sustainable conditions before allowing continued bicycle use.

Soils may be disturbed through the possible development of social trails in the area. Social trails are unofficial trails created by hikers or cyclists traveling off the established trail. Creation and use of social trails will result in erosion and trampling of soils in the general area. Soils associated with the social trails will be adversely impacted as they erode and are carried to lower elevations by wind, storm events, and continued trail use.

The proposed action of allowing mountain bicycles on the Jackson Gap Trail and the upper section of the John Smartt Trail will add approximately 200 bicycle users annually to the total number of recreational visitors on these trails. The increased impacts to soils from bicycle use on the trails are anticipated to be small. Current and future generations of visitors will continue to have opportunities to experience soils at the park that will not be degraded by allowing bicycle use. Therefore, implementation of the selected alternative will not result in impairment to soils.

Non- Impairment Findings for Vegetation:

Under alternative B the Jackson Gap Trail and John Smart Trail will continue to allow hiking and will open the Jackson Gap Trail and the upper section of the John Smartt Trail to mountain bicycle use. There may be an increased disturbance to vegetation due to bicycle use if bicycle users go off-trail; however, park staff will continue to monitor trail use and condition to ensure minimal effect to vegetation. Impacts to vegetation associated with the proposed action will be similar to those described for alternative A, but incrementally greater because of bicycle use of the trail.

Although individual plants may be affected if bicycle users go off-trail, there will be no impacts to vegetation at the community level as a result of implementation of the selected alternative. Given the steep and challenging terrain on this 1.9-mile trail section, park staff anticipates a relatively low increase of approximately 200 bicycle users on these trails annually; as such, a small, localized impact to vegetation is expected within the Lookout Mountain area. Allowing mountain bicycles on Jackson Gap and John Smartt trails will affect a small portion of the park.

The park will continue monitoring and implementing management strategies to minimize impacts that will include: issuing citations for off-trail use, increasing monitoring, increasing education, enforcement of regulations, increased number of hours the trail is closed to bicycle use following rain events. Because impacts will be limited to localized individual plants, there

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will be no impacts to vegetation at the community level, there will be no impairment of vegetation at the park.

Non-Impairment Finding for Historic Structures:

The proposed action of allowing mountain bicycles on the Jackson Gap Trail and the upper section of the John Smartt Trail will add approximately 200 bicycle users annually to the total number of recreational visitors on these trails. However, park staff anticipates this increased use will not have a measurable impact on historic structures within this area. Although bicycle users may go off-trail, the Resource Management Division will monitor the retaining walls and drainages more frequently to ensure these resources are protected. The park will implement management strategies to minimize resources impacts that include: issuing citations for off-trail use, increasing monitoring, increasing education, enforcement of regulations, re-evaluating trail design, and/or requesting trail advocates' assistance with establishing a defined trail edge by barricading shortcuts. Because increased use of the trail is not expected to have a measurable impact on historic structures within this area, there will be no impairment to historic structures within the park.

No impairment of soils, vegetation, or historic structures will occur under the selected alternative because park staff will be monitoring and implementing management strategies to avoid, minimize and mitigate potential impacts.