



FINDING OF NO SIGNIFICANT IMPACT

Comprehensive Trail System Plan

Catoctin Mountain Park Thurmont, Maryland

The National Park Service (NPS) prepared a Comprehensive Trail System Plan / Environmental Assessment (Plan) to evaluate the potential environmental impacts associated with trail improvements at Catoctin Mountain Park (Park), an administrative unit of the national park system located in Thurmont, Maryland. The purpose of the Park is to provide quality recreational opportunities in the Catoctin Mountains and serve as a setting and buffer for the Presidential Retreat, while protecting and conserving the Park's natural and cultural environments in the spirit of New Deal conservation programs.

The Plan will serve park managers as a framework by which they can manage and maintain existing trails; close/realign existing trails when needed; add new trails and access points where appropriate; and, where feasible, create trails that are universally accessible to meet the Architectural Barriers Act Accessibility Standards (ABAAS). The Plan will also provide comprehensive guidance for enhancing the park's trail system and visitor experience throughout the park in a manner that is sympathetic with the natural and cultural surroundings and balances resource protection with intended trail uses and long-term management. The Plan will address the following concerns and ongoing issues affecting the Park's trail system:

- Over the years, trail segments were added incrementally, without cohesive planning. The resulting trail system has connection issues and is difficult to maintain.
- Many trails have eroded and degraded due to poor design and alignment, resulting in safety and environmental concerns.
- Some features of interest (e.g., rock climbing) and overnight facilities within the park are not connected to the trail system, which forces visitors to drive to trailheads or walk along roadways to access trails.
- The Park does not provide adequate accessible trails to points of interest.
- Visitor use of the Park's trails and parking lots is not evenly distributed throughout the park. A majority of visitors utilize the parking lots in the east side of the park, which lack connections to trails in the west side of the park.
- Trail orientation signage and naming conventions within the park are not standardized.
- The park lacks formal connections to, and integration with, local and regional trail systems.
- Some trail crossings of roadways, including Route 77, are unsafe for pedestrians.

The EA was prepared in accordance with the National Environmental Policy Act (NEPA) (42 United States Code (USC) § 4332) and the Council on Environmental Quality implementing regulations effective September 14, 2020 (40 Code of Federal Regulations (CFR) §§ 1500-1508); US Department of the Interior NEPA regulations (43 CFR 46); NPS Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-Making; and the NPS NEPA Handbook. 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.

PUBLIC AND AGENCY INVOLVEMENT

Public Scoping – As part of the NEPA process and to comply with the requirements of Section 106 of the National Historic Preservation Act, the NPS involved the public in project scoping by holding a 30-day public comment period from March 10 to April 10, 2021. A virtual public meeting was also held on March 10, 2021, using the Teams platform. The scoping period and virtual meeting were announced by sending an email blast to agencies, stakeholders, and other potentially interested parties from a mailing list established for the Project. The presentation used during the virtual public meeting, a recording of the meeting, the scoping flyer, and a scoping information sheet remain available at the NPS Planning, Environment and Public Comment (PEPC) project webpage (<https://parkplanning.nps.gov/projectHome.cfm?projectID=98941>). A total of 31 correspondences were received from the public during the scoping period.

EA Public Review – The EA was made available for public review and comment from January 5 to February 3, 2022, at the NPS PEPC project webpage (<https://parkplanning.nps.gov/document.cfm?parkID=176&projectID=98941&documentID=117384>). The EA public review period was announced on the NPS PEPC project webpage and by news release and email blast. A total of 64 correspondences were received during the EA public review period. Responses to public comments are provided in Attachment B.

National Historic Preservation Act, Section 106 Consultation - Section 106 of the National Historic Preservation Act (543 USC 306101) and its implementing regulations (36 CFR Part 800) requires federal agencies to take into consideration the effects projects have on historic properties. In alignment with Section 106 and the Programmatic Agreement Among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers with Compliance for Section 106 of the National Historic Preservation Act (2008), the Park initiated formal consultation with the Maryland Historic Trust, the State Historic Preservation Office (SHPO) on January 11, 2021. The Park submitted a Section 106 Assessment of Effect package to the SHPO in a letter dated December 15, 2021, along with a letter on January 4, 2022, recommending that this project will have no adverse effect on historic resources. The SHPO concurred with the NPS that this project will have no adverse effect in a document February 14, 2022 (see Attachment C).

Tribal Consultation – Tribal consultation initiation letters were sent to the Delaware Nation, Seneca-Cayuga Nation, and the Tuscarora Nation on February 5, 2021, and a Section 106 Assessment of Effect package was submitted on December 13, 2021. The consultation correspondence to the Tribes is provided in Attachment C. No comments were received from any of the Tribes.

U.S. Fish and Wildlife Service (USFWS) - In accordance with Section 7 of the Endangered Species Act, an official species list was obtained through the US Fish and Wildlife Service's (FWS) Information, Planning, and Consultation (IPaC) System on February 02, 2021, which identified the endangered Indiana Bat (*Myotis sodalists*) and the threatened Northern Long-eared Bat (*Myotis septentrionalis*) as potentially occurring within the Park. No designated critical habitat was identified to occur within the Park's boundary. As such, the Park followed up and sent a consultation letter to USFWS on February 02, 2021. On March 8, 2021, USFWS responded that the federally listed species were are known to occur in the project vicinity, this project, as proposed, would have "no effect" on either species.

ALTERNATIVES CONSIDERED AND SELECTED

The EA analyzed two alternatives: (A) no action, and (B) action alternative (i.e., the Plan). Based on the analysis presented in the EA, the NPS selected Alternative B: Action Alternative (the NPS Preferred Alternative) for implementation. The selected alternative is described on pages 11-19 of the EA. The selected alternative will provide new trails and accessible trails and amenities, realign existing trail sections with design problems, improve trail crossings of Route 77, and provide opportunities for trail connections to local and regional trail systems. The selected alternative will also allow the use of bikes on an administrative road, designate a Fly Fishing Heritage Trail, add two new parking areas, and improve four existing parking areas, which would support connections to the existing and planned trail network. The following summarizes Alternative B.

The alignment of new and realigned trails, as well as the location of new parking areas and improved parking areas, will be carefully sited to avoid archeological sites, avoid areas known to have rare plants, Maryland Natural Heritage Areas, G2 (Imperiled) rare ecosystems, seeps and springs, Wetlands of Special State Concern (WSSC), and slopes greater than 50 percent. New and realigned trails will also be designed, constructed, and maintained according to appropriate trail design standards. All accessible trails will be designed and constructed to comply with the 2015 ABAAS.

New Trails - Approximately 10.3 miles of new trails that allow hiking will be added, which would be a 42.3 percent increase to the park's trail system. New foot bridges will be installed as needed to cross wetlands and streams. New interpretive waysides will be installed to educate visitors about resources along the new trails.

Realigned Trails - Approximately 2.7 miles of existing trails that suffer from moderate or severe erosion or other condition problems will be realigned. Natural groundcover vegetation will be allowed to grow into the closed trail section, but the closed trail section will be maintained to include a trace so that the alignment is legible in the landscape. Ongoing trail maintenance will rehabilitate existing trails not realigned to minimize erosion and reduce drainage issues.

Accessible Trails and Amenities - Approximately 1.3 miles of existing trails will be converted to trails that are universally accessible. Existing parking areas that provide access to these new accessible trails will be updated to comply with ABAAS.

A new accessible trail will be added to connect existing accessible campsites to the existing restrooms at Owens Creek Campground. At the Chestnut Picnic Area, an existing picnic site will be converted to an accessible picnic site and the existing path from the existing accessible picnic site to the restroom facility will be converted to an accessible trail.

Bike Trail - The use of bikes, including mountain bikes and electric bikes (e-bikes), will be permitted on the 0.4-mile administrative road connecting Manahan Road and Foxville Deerfield Road.

Fly Fishing Heritage Trail – Approximately 0.7 miles of the existing Gateway Trail along Big Hunting Creek will be designated as a Fly Fishing Heritage Trail. Interpretive signage will be added along the trail. The five existing small fishing pull-off areas along Route 77 will be improved by adding interpretive signage and formalizing pedestrian access to Big Hunting Creek.

Road Crossing Improvements – The Catoclin National Recreation Trail (CNRT) crossing and the Cunningham Falls Nature Trail crossing between the park and Cunningham Falls State Park on Route 77 will be improved enhance the visitor experience and alleviate unsafe conditions. The NPS will work with the Maryland Department of Transportation State Highway Administration (SHA) and Cunningham Falls State Park to improve the crossings. Potential options include, but are not limited to, realigning the road crossing to a safer location with better vehicle sight distances, working with SHA to control the speed of traffic, install pedestrian crossing signs, and/or install traffic calming devices, and working with Cunningham Falls State Park to install trail directional signage.

Potential Future External Trail Connections – The NPS will coordinate with appropriate entities to connect the park's trail system to the Appalachian Trail, and the Town of Thurmont. Exact trail routes and how the routes are implemented will be dependent on potential agreements with these entities.

Parking - Two new parking areas will be added, and four existing parking areas will be improved. A new parking area on Foxville Deerfield Road will be an unpaved lot that will accommodate up to 20 cars, covering approximately 0.2 acres. The new parking area at Mount Zion Road will be an unpaved lot that will accommodate up to 15 cars and 2 horse trailers, covering approximately 0.4 acres.

The existing Visitor Center parking lot will be expanded approximately 0.2 acres towards Route 77 and restriped to improve vehicle circulation when the lot is full. The expanded parking lot will increase the existing number of parking spaces by six spaces. At the Lewis Area, the parking area will be enlarged approximately 0.1 acres, from 10 to 20 spaces and resurfaced, with pervious materials, to define the parking area more clearly. The entrance lane will be resurfaced, the trailhead will be improved, drainage

issues will be addressed, and NPS park signage will be installed to formalize the area as a park entrance and improve visitor experience and wayfinding. At the Horse Trailer parking lot, the end of the parking lot will be expanded to allow horse trailers to turn around and exit through the existing access point to Park Central Road. At the Sawmill Exhibit parking area, the parking area would be widened approximately 0.02 acres to accommodate two buses parked end to end parallel with Foxville Deerfield Road. The expanded parking area will increase the existing number of parking spaces by five spaces.

Signage – Signage throughout the park will be improved to be consistent with the Catoctin Mountain Park Long Range Interpretive Plan (2008) guidelines. Standardized trail signs will be placed at new trailheads, accessible trailheads, critical trail intersections, bouldering sites, and trailheads that allow equestrians. New park entrance and orientation signage will also be added to the new parking area on Mount Zion Road and improved parking area at the Lewis Area. Metal reflective tags will be installed on trees as blazes to replace existing paint.

Trail Maintenance – Routine trail maintenance activities will be conducted on new, realigned, and existing trails.

RATIONALE FOR DECISION

The NPS selected Alternative B for implementation because it best meets the purpose and need of the Plan, as it provides more connections between existing trails, to features of interest, and local and regional trail systems; improves visitor safety and wayfinding; and addresses park maintenance in a manner that is sympathetic with the natural and cultural surroundings and balances resource protection with intended trail uses and long-term management.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts and effects on cultural resources. Mitigation measures for affected resources are outlined in the EA and are presented as Appendix A.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT IMPACT

As documented in the EA, the selected alternative has the potential for adverse and beneficial impacts on historic resources (see EA pages 25-28); archeological resources (see EA pages 29-30); and visitor use and experience (see EA pages 33-36). The NPS has determined that the selected alternative can be implemented without significant adverse effects, as defined in 40 CFR § 1508.27.

Minor change to historic districts and cultural landscapes will result from the introduction of new, realigned, and accessible trails; the completion of routine trail maintenance; and the creation of new and improved parking areas, which will alter circulation patterns, buildings and structures, small-scale features, archeological sites, vegetation, natural systems and features, spatial organization, and topography within the park. The alternative will minimize adverse impacts on historic resources by designing new features to be compatible with the rustic character of the park landscape by using indigenous materials, muted colors, and a design that is representative of the rustic style and sympathetic and complementary to the surrounding landscape. These design actions will be undertaken in a manner that is consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. While through the Section 106 process the MHT concurred with the Park's assertion of "No Adverse Effect" from the overall Trails Plan, consultation with the MHT and Tribal Partners will also occur as the precise locations of each element of the Plan are developed and designed.

Implementation of the selected alternative may result in adverse impacts on archeological resources. A Phase I archeological survey has not been conducted for the entirety of the project's area of potential effect (APE). Approximately half of the park has not been subject to any form of archeological survey. In order to avoid adverse impacts, the NPS will conduct a Phase I archeological survey in unsurveyed areas and in areas previously subjected only to pedestrian survey in advance of any construction activities. Any such archeological studies and investigations will be carried out where ground disturbance is proposed and evaluated for effect in consultation with the MHT and Tribes. If NRHP-eligible or

potentially eligible archeological resources are found to be present, the NPS will define the appropriate avoidance, minimization, and mitigation measures to be taken in consultation with the MHT and Tribes.

The selected alternative will result in beneficial impacts on visitor use and experience. New trails will increase connectivity to currently disconnected areas and provide opportunities for visitors to experience points of interest and areas of the park currently inaccessible to visitors. Signage improvements throughout the park will improve visitor wayfinding and provide new educational opportunities. The closure and realignment of existing trails with moderate or severe erosion or other problems will reduce safety concerns of trail users and provide trail users with improved trails. New accessible trails will increase access to recreation and points of interest in the park for visitors with physical disabilities. A new accessible trail at Owens Creek Campground, and a new accessible trail and picnic site at the Chestnut Picnic Area will improve access to restrooms for visitors with physical disabilities. The allowance of bikes on the administrative road will provide bicycle access to Owens Creek Campground via Manahan Road, creating an overnight option for longer bicycle trips. The improvement of the CNRT and Cunningham Falls Nature Trail crossings of Route 77 will improve pedestrian safety and connectivity between with Cunningham Falls State Park. New and improved parking lots will increase access to the park and the trail system, improve circulation within existing lots, and accommodate future visitor growth.

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.

RICHARD SLADE Digitally signed by RICHARD SLADE
Date: 2022.03.08 12:56:49 -05'00'

Recommended:

Rick Slade
Superintendent
Catoctin Mountain Park
Region 1 – National Capital Area
Date

Approved:



Kym A. Hall
Regional Director
Region 1 - National Capital Area
Date
March 18, 2022

Documents appended to the FONSI include:

- Appendix A: Mitigation measures
- Appendix B: Non-impairment documentation
- Appendix C: Public comment responses
- Appendix D: Section 106 consultation correspondence

APPENDIX A: MITIGATION MEASURES

Historic Resources

The selected alternative will minimize impacts on the historic resources by designing new features to be compatible with the rustic character of the park landscape by using indigenous materials, muted colors, and a design that is representative of the rustic style and sympathetic and complementary to the surrounding landscape. These design actions would be undertaken in a manner that is consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. Consultation with the MHT and Tribes will occur as the precise locations of each element of the Plan are developed and designed.

Archeological Resources

The NPS will avoid adverse impacts on archeological resources by conducting a Phase I archeological survey for undocumented areas and areas previously subjected only to pedestrian survey without shovel testing where ground disturbance is proposed after exact project footprints are identified and prior to site work. Any such archeological studies and investigations will be carried out and evaluated for effect before construction and in consultation with the MHT and Tribes. If NRHP-eligible or potentially eligible archeological resources are found to be present, the NPS would define the appropriate avoidance, minimization, and mitigation measures to be taken in consultation with the MHT and Tribes.

A protocol for the unanticipated discovery of cemeteries or human remains will be developed for the construction contractor. If any Native American burials, cemeteries, or funerary objects are encountered, the NPS will contact federally recognized Tribes with affiliation in Maryland, in accordance with the Native American Graves Repatriation Act (NAGPRA). The NPS will also avoid disturbing known archeological resources during design and construction to the extent practicable. During the construction phase, the NPS will also minimize ground-disturbing activities to the extent practicable, including using existing vehicle circulation areas and construction methods that minimize land disturbance. If appropriate, archeological monitoring will also take place during construction.

The NPS will also avoid disturbing known archeological resources during design and construction to the extent practicable. During the construction phase, the NPS will also minimize ground-disturbing activities to the extent practicable, including using existing vehicle circulation areas and construction methods that minimize land disturbance. If appropriate, archeological monitoring will also take place during construction.

Visitor Use and Experience

In order to minimize impacts on visitor use and experience during construction, the NPS will perform construction work during off-peak visitor use periods where possible, minimizing construction impacts.

APPENDIX B: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (54 USC 100101).

The NPS has discretion to allow impacts on Park resources and values when necessary and appropriate to fulfill the purposes of a Park (NPS 2006 sec. 1.4.3). However, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006 sec 1.4.3). An action constitutes an impairment when its impacts “*harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values*” (NPS 2006 sec 1.4.5). To determine impairment, the NPS must evaluate “*the particular resources and values that would be affected; the severity, duration, and timing of the impact...and other impacts*” (NPS 2006 sec 1.4.5).

This determination on impairment has been prepared for the selected alternative described in this Finding of No Significant Impact. An impairment determination is made for the resource topics of historic resources and archeological resources. These resources are considered fundamental to Catoctin Mountain Park. An impairment determination is not made for visitor use and experience because 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 and cannot be impaired in the same way that an action can impair park resources and values. This determination on impairment has been prepared for the action alternative described in Chapter 2 of the Catoctin Mountain Park Comprehensive Trail System Plan EA.

HISTORIC RESOURCES - The introduction of new, realigned, and accessible trails; routine trail maintenance; and new and improved parking areas will result in changes to contributing circulation, buildings and structures, small-scale features, archeological sites, vegetation, natural systems and features, spatial organization, and topography within the park. However, implementation of the selected alternative will not diminish the integrity of the historic resources by designing new features to be compatible with the rustic character of the park landscape by using indigenous materials, muted colors, and a design that is representative of the rustic style and sympathetic and complementary to the surrounding landscape. These design actions will be undertaken in a manner that is consistent with *The Secretary of the Interior’s Standards for the Treatment of Historic Properties*. Consultation with the MHT and Tribes will also occur as the precise locations of each element of the Plan are developed and designed. The Plan would be implemented over a period of ten to 15 years as specific projects are implemented. Because the selected alternative will result in no significant impacts on historic resources and the NPS will design new features in a manner that protects and preserves historic resources’ condition and integrity through consultation with the MHT and Tribes, there will be no impairment to the park’s historic resources.

ARCHEOLOGICAL RESOURCES - Proposed actions associated with the selected alternative will have no significant impact on archeological resources. In order to avoid adverse impacts on archeological resources, the NPS will conduct a Phase I archeological survey for undocumented areas and areas previously subjected only to pedestrian survey without shovel testing where ground disturbance is proposed after exact project footprints are identified and prior to site work. Any such archeological studies and investigations will be carried out and evaluated for effect before construction and in consultation with the MHT and Tribes. If NRHP-eligible or potentially eligible archeological resources are found to be present, the NPS will define the appropriate avoidance, minimization, and mitigation measures to be taken in consultation with the MHT and Tribes. A protocol for the unanticipated discovery of cemeteries or human remains will be developed for the construction contractor. If any Native American

burials, cemeteries, or funerary objects are encountered, the NPS will contact federally recognized Tribes with affiliation in Maryland, in accordance with the Native American Graves Repatriation Act (NAGPRA). The NPS will also avoid disturbing known archeological resources during design and construction to the extent practicable. During the construction phase, the NPS will also minimize ground-disturbing activities to the extent practicable, including using existing vehicle circulation areas and construction methods that minimize land disturbance. If appropriate, archeological monitoring will also take place during construction. Because the selected alternative will result in no significant impacts on archeological resources and the NPS will carry out all reasonable measures to protect and preserve their condition and integrity, there will be no impairment to the archeological resources.

CONCLUSION

The NPS has determined that the implementation of the NPS selected alternative will not constitute an impairment of the resources or values of Catoctin Mountain Park. As described above, implementing the selected alternative is not anticipated to impair resources or values that are essential to the purposes identified in the establishing legislation of the park, key to the natural or cultural integrity of the park, or identified as significant in the park's relevant planning documents. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of the NPS Management Policies 2006.

APPENDIX C: PUBLIC COMMENT RESPONSES

Topic	Concern Statement Summarized	Response
Overall Support for Plan	Support the Plan.	Comment noted.
New Trails	Support new trails.	Comment noted.
	Support consideration of natural resources when planning for new trails to bouldering sites.	Comment noted. The NPS considered natural resources in its trail planning. As described on page A-1 of the EA Appendix A: Trails Plan Methodology and Guidance, the NPS avoided areas known to have rare plants, Maryland Natural Heritage Areas, G2 (Imperiled) rare ecosystems, seeps and springs, Wetlands of Special State Concern (WSSC), and slopes greater than 50 percent. The NPS also minimized crossings of water resources and non-WSSC wetlands and avoided floodplains to the extent feasible.
	Oppose all or portions of new trails because they would open up previously unspoiled areas of the park.	<p>Comment noted. The NPS considered the park’s natural and archeological resources in the planning of new trails. As stated on page 11 of the EA, new trails “would be carefully sited to avoid archeological sites, sensitive habitats, and steep and unsustainable slopes, and minimize crossings of water resources and wetlands to the extent feasible.”</p> <p>As described on pages 5-10 of the EA, the NPS would avoid or minimize impacts on wetlands, floodplains, water resources, vegetation, wildlife and wildlife habitat, threatened and endangered species, and geology and soils through the following:</p> <ul style="list-style-type: none"> • Obtain necessary federal and state permits and adhere to the requirements of those permits and applicable NPS Director’s Orders and Procedural Manuals • Use of applicable Best Management Practices (BMPs) during construction to minimize soil erosion, sediment disturbance, and/or turbidity • Re-vegetate or stabilize soils exposed during construction • Avoid the removal of large trees; avoid the removal of other trees to the extent feasible • Construct new trails of permeable materials • Design new trails to be sustainable trails in relation to slopes

Topic	Concern Statement Summarized	Response
		<ul style="list-style-type: none"> • Monitor and remove exotic and invasive plant species • Ongoing consultation with the US Fish and Wildlife Service (and the Maryland Department of Natural Resources Wildlife and Heritage Service as needed) • Adherence to applicable minimization or conservation measures to protect threatened and endangered species • Phase the project over a period of 10 to 15 years
	<p>Oppose all or portions of new trails because they would increase visitor use, thereby altering the solitary experience and disrupt equestrian uses.</p>	<p>Comment noted. As stated on page 1 of the EA, part of the need for the Plan is to address the uneven distribution of visitor use throughout the park. As described on pages 31 and 35 of the EA, the parking areas on the east side of the park frequently and quickly reach capacity on the weekends and cause congestion. New trails connecting the east and west sides of the park's trail system would reduce congestion at parking areas on the east side of the park, provide new trail loop options that vary in length and difficulty, and provide access to additional points of interest and additional areas of the park that are currently inaccessible to visitors.</p>
	<p>Oppose all or portions of new trails because they would require more maintenance resources and the remote location of some trails could make trail maintenance more difficult.</p>	<p>Comment noted. The NPS will continue its maintenance practices throughout the park.</p>
	<p>Oppose new trail in the northern portion of the park and the new trail connecting to the Braestrup property because they could introduce exotic and invasive plant species in these areas and their remote locations and topography could result in</p>	<p>Comment noted.</p> <p>Page 8 of the Plan/EA states "The proposed project's addition of approximately 10.3 miles of new trails could bring seeds of exotic and invasive plant species into areas of the park that are currently inaccessible to visitors. The NPS would monitor and remove exotic and invasive plant species in accordance with the NPS National Capital Region region-wide invasive plant management plan and specific park policies."</p>

Topic	Concern Statement Summarized	Response
	longer emergency-response times.	
	Oppose the new trail in the northern portion of the park because other new east-west connecting trails are proposed, existing long trails on the west side of the park are not well-used, and there are existing long hiking trail options nearby.	Comment noted. As noted on pages 11 and 35 of the EA, the Plan adds loop trail options, including a longer loop to the north, to accommodate a variety of skill levels and interests. New trails would provide access to additional points of interest and additional areas of the park that are currently inaccessible to visitors.
	Add a trail connection to the Boss Hog boulder, located between the Hog Rock Trail and the General Boulder, in order to provide a clear path and minimize vegetation disturbance.	Comment noted. While this proposed trail segment was not included as part of this Trails Plan, it does not preclude it, or other proposed trail segments, from being considered in the future.
	How are the maintenance and patrolling resources needed for new trails factored into budget and other planning considerations?	Construction and maintenance funding for additional trails have been added to the park's financial plan.
Realigned Trails	Support realignment of existing trails.	Comment noted.
	When the Gateway Trail is realigned, realign the trail so that it connects from the north corner of the Crow's Nest campground area directly west to the	Comment noted.

Topic	Concern Statement Summarized	Response
	Chimney Rock Trail.	
Accessible Trails and Amenities	Support accessibility improvements to trails, amenities, and/or parking.	Comment noted.
Bike Trail	Support bike trail.	Comments noted.
	Add more bike trails, including connecting the Frederick Watershed and the Emmitsburg trails and Cunningham Falls Lake to an overlook.	<p>Comment noted.</p> <p>Page 32 of the Plan/EA states "Bicycles are allowed on the park roads. Bicycles are prohibited on the park's trail system." The Plan "would permit the use of bikes, including mountain bikes and electric bikes (e-bikes), on the 0.4-mile administrative road connecting Manahan Road and Foxville Deerfield Road" as stated on page 12 of the EA.</p> <p>Hunting Creek Lake is located in Cunningham Falls State Park, which is outside of the NPS jurisdiction.</p>
	Oppose bike trail because there are existing bike trails in the area.	Comment noted.
	Oppose bike trail because bikes could diminish the visitor experience, alter the quiet experience and wildlife viewing opportunities, and create user conflicts with equestrian uses.	<p>Comment noted. The majority of the park's existing trail system, including those trails on the west side of the park, would continue to provide opportunities for hikers to enjoy the park's quiet setting and view wildlife without interfering with bikes. If the Plan's allowance of bikes on the administrative road is realized, approximately 98.3 percent (or 23.9 miles) of the park's existing 24.3-mile trail system would continue to prohibit the use of bikes. If the Plan is fully realized, approximately 98.8 percent (or 34.2 miles) of the park's total 34.6-mile trail system consisting of existing and new trails would prohibit the use of bikes.</p> <p>Potential bike and horse conflicts would be limited to the approximately 0.2-mile section of Manahan Road that connects the CNRT. This section of Manahan Road currently allows bikes. Bikes are currently allowed on park roads.</p> <p>Page 13 of the Plan/EA states "Signs at shared-use trailheads would provide information about the allowed trail user groups and appropriate trail yielding etiquette."</p>
	Oppose bike trail because bike trails would create new	Comment noted. Pages 13-14 of the Plan/EA states "Alternative B would include routine maintenance on new, realigned, and existing trails. Maintenance activities

Topic	Concern Statement Summarized	Response
	maintenance priorities, including trail erosion and fallen trees that could be a bike safety concern.	would include . . . Install new erosion control and drainage features . . . Cut through fallen trees that are blocking the trail corridor.”
Fly Fishing Heritage Trail	Support the Fly Fishing Heritage Trail and connect beyond park boundaries, noting that it should be prioritized and would result in increased public benefit, natural resource protection, and tourism for the surrounding community.	Comment noted. Designation of a Fly Fishing Heritage Trail beyond Catoctin Mountain Park’s boundary is outside of NPS control and would be dependent on coordination between the Town of Thurmont and private property owners along Big Hunting Creek.
	The trail should highlight the history of fly fishing and contributions of associated groups in the area.	Comment noted. Pages 12-13 of the Plan/EA states “This trail would provide opportunities to learn about the practices and history of fly fishing, including how it relates to Big Hunting Creek. Interpretive signage would be added along the trail. . . . Alternative B would improve signage throughout the park consistent with the Catoctin Mountain Park Long Range Interpretive Plan (2008) guidelines.”
Road Crossing Improvements	Support improvements to trail crossings of Route 77.	Comment noted.
	Improve Route 77 crossings at the Visitor Center and/or Park Headquarters to alleviate unsafe conditions.	Comment noted. Pages 20-21 of the Plan/EA state "An improved road crossing between the Park Headquarters parking area and the Cunningham Falls State Park parking area for the Cat Rock Trailhead on Route 77 was considered. The two parking areas do not align with one another and are separated by Big Hunting Creek, which flows through a culvert under Route 77. The two parking areas are also located along a curve on Route 77 with poor vehicle sight distances. An improved road crossing was also considered to the east of the Visitor Center near the Cunningham Falls State Park parking area along Route 77. During the preparation of the Plan, the NPS met with SHA to discuss options for improvements in these two areas. The road crossing near Park Headquarters was dismissed from further consideration because it would require widening the Route 77 Big Hunting Creek bridge,

Topic	Concern Statement Summarized	Response
		<p>which is not NPS property. The road crossing near the Visitor Center was dismissed from further consideration because the crossing would only be needed during peak visitation periods when visitors park along the shoulder of Route 77 due to lack of parking elsewhere. The NPS and SHA determined that a crossing would not prevent visitors from walking along the road shoulder."</p> <p>The Plan does not preclude potential future safety improvements along Route 77 by SHA.</p>
	<p>Install traffic calming devices or a traffic light and lower speed limits on Route 77.</p>	<p>The installation of traffic calming devices and traffic lights along Route 77 are not controlled by the NPS.</p> <p>Route 77 speed limit is not controlled by the NPS. Page 12 of the Plan/EA states "The NPS would work with the Maryland Department of Transportation State Highway Administration (SHA) . . . to improve the [Catoctin National Recreation Trail and the Cunningham Falls Nature Trail] crossings. Potential options include, but are not limited to, . . . working with SHA to control the speed of traffic."</p> <p>The Plan does not preclude potential future safety improvements along Route 77 by SHA.</p>
<p>Potential Future External Trail Connections</p>	<p>Support potential future external trail connections.</p>	<p>Comment noted.</p>
	<p>Implementation of potential future external trail connections.</p>	<p>Page 13 of the Plan/EA states "The NPS would coordinate with appropriate entities to connect the park's trail system to the Appalachian Trail, and the Town of Thurmont. These entities could include the Potomac Appalachian Trail Club, Appalachian Trail Conservancy, City of Hagerstown Watershed, Town of Thurmont, SHA, South Mountain State Park, Frederick County, Preserve Middletown Valley/Catoctin Watershed, Catoctin Land Trust, Hagerstown & Frederick Trolley Trail Association, and private property owners. Exact trail routes and how the routes are implemented would be dependent on potential agreements with these entities."</p>
	<p>Add a potential future external trail connection from Frank Bentz Memorial Pond to Catoctin Mountain Park.</p>	<p>Comment noted. This proposed trail segment is not being considered at this time. The Lewis parking area and trailhead is close to the Frank Bentz Memorial Pond, negating the need for that added connection.</p>
	<p>The Town of Thurmont will be making multiple</p>	<p>Comment noted.</p>

Topic	Concern Statement Summarized	Response
	trail improvements adjacent to the park.	
Parking	Support new parking areas and/or improvements to existing parking areas.	Comment noted.
	Improve the existing gravel parking area on Mount Zion Road near the CNRT.	The existing gravel parking area on Mount Zion Road near the CNRT is located on private property. Therefore, improvements to this parking area are not within NPS jurisdiction. The Plan would provide a new parking area on Mount Zion Road near the CNRT within the park boundaries. Page 13 of the Plan/EA states "The new parking area at Mount Zion Road would be an unpaved lot that would accommodate up to 15 cars and 2 horse trailers."
	Formalize and improve unofficial existing parking areas along Manahan Road.	At this time, the Park is not considering formalizing parking along Manahan Road. The parking lot expansion near the sawmill will serve this purpose. This does not preclude this action in the future, should the need arise to expand parking in the area.
Signage	Support signage improvements.	Comment noted.
	Include trail rules on signage, including at bouldering sites.	Comments noted. Page 13 of the Plan/EA states "Alternative B would improve signage throughout the park consistent with the Catoctin Mountain Park Long Range Interpretive Plan (2008) guidelines."
	Install signage along Route 77 near the Visitor Center and at Foxville Deerfield Road directing park visitors to the west side of the park to offload park visitation on the east side of the park.	Comment noted. Page 13 of the Plan/EA states "Alternative B would improve signage throughout the park consistent with the Catoctin Mountain Park Long Range Interpretive Plan (2008) guidelines. . . . New signs would provide clear direction for the navigation of new, existing, and realigned trails."
	The Town of Thurmont plans to	Comment noted.

Topic	Concern Statement Summarized	Response
	install Gateway Trail directional.	
Trail Maintenance	Support trail maintenance.	Comment noted.
	Add bridge to the Deerfield Nature Loop Trail where it crosses over the creek.	Comment noted. The Plan includes the repair or replacement of existing foot bridges. Page 14 of the Plan/EA states "Repair or replace, in-kind, existing trail features, such as foot bridge."
	The new water bars installed along the Hog Rock trail in the summer of 2021 seem more abrupt than necessary and create a larger step than seems safe.	Comment noted.
	Volunteered for trail maintenance.	Comment noted. Information about how to volunteer at Catoctin Mountain Park is available on the park's website at https://www.nps.gov/cato/getinvolved/volunteer.htm .
Vegetation Maintenance	Develop a long-term plan and actively manage the regeneration of the oak hickory forest.	Comment noted. Vegetation management not related to the trail system is beyond the scope of this project.
	Remove barberry, instead of trimming, when conducting trail work.	Comment noted. Invasive plant management is beyond the scope of this project. The NPS monitors and removes invasive plant species in accordance with the NPS National Capital Region region-wide invasive plant management plan and specific park policies.
	Perform vegetation maintenance to preserve views and vistas from overlooks.	Comment noted. While not directly mentioned in the description of the Preferred Alternative, the plan does not preclude trimming vegetation to improve views and vistas. As it states in a bulleted list on page 14 of the EAs, "Trim herbaceous and woody vegetation within the trial corridor." Trimming vegetation to improve views and vistas will be considered on a case by case basis.
Other Recommendations	Allow climbing instructors to access Wolf Rock without a permit.	Comment noted. Changes to park climbing rules and regulations are beyond the scope of this project.
	Link the Catoctin Furnace area to Catoctin Mountain Park through	Comment noted. Page 13 of the Plan/EA states "Alternative B would improve signage throughout the park consistent with the Catoctin Mountain Park Long Range Interpretive Plan (2008) guidelines."

Topic	Concern Statement Summarized	Response
	interpretive trails and programming.	
	Preserve the hunting area.	Hunting is not allowed in Catoctin Mountain Park.
	Dredge the pond at the Lewis Area so it doesn't get choked out in the summer.	Comment noted. Pond improvements are beyond the scope of this project.
	Remove the Frank Benz Pond.	The Frank Bentz Pond is not within NPS jurisdiction.
	Designate the area around and downstream of Frank Benz Pond as a youth only, fly fishing area.	Creek designations are regulated by the State of Maryland.
	Restore Big Hunting Creek to a more natural stream bed.	<p>Comment noted. Stream restoration efforts are beyond the scope of this project. The section of Big Hunting Creek starting approximately from the Crow's Nest Campground property and extending to the east (or downstream) is not within NPS jurisdiction.</p> <p>However, the Plan would close and realign the section of the Gateway Trail adjacent to Big Hunting Creek, which would benefit Big Hunting Creek. Page 12 of the Plan/EA states "Alternative B would also close and realign sections of existing trails that suffer from moderate or severe erosion or other condition problems due to heavy use or poor design and alignment. Realigned trails would . . . reduce erosion, which has contributed to streambank failures . . . Ongoing trail maintenance would rehabilitate existing trails not realigned to minimize erosion and reduce drainage issues." Page 7 of the EA also states "realigned trails would be designed to be sustainable in relation to slopes and shed water from the trail before it has a chance to erode, instead allowing it to permeate into surrounding vegetation. Specific BMPs to minimize soil erosion, sediment disturbance, and/or turbidity would be developed as the planning and design state of the proposed project continues. . . . Realigned trails and ongoing trail maintenance would reduce stormwater runoff through improved design, thereby reducing stream sedimentation."</p>

APPENDIX D: SECTION 106 COORDINATION LETTERS

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United States Department of the Interior

NATIONAL PARK SERVICE
CATOCTIN MOUNTAIN PARK
6602 Foxville Road
Thurmont, MD 21788



IN REPLY REFER TO:

CATO-1.A.2 COMPLIANCE

January 4, 2022

Elizabeth Hughes
State Historic Preservation Officer
Attn: Beth Cole, Administrator, Project Review and Compliance
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, MD 21032



Subject: Section 106 Review: **Catoctin Mountain Park Comprehensive Trail System Plan
Frederick and Washington Counties, Maryland
NPS PEPC 98941**

Dear Ms. Hughes:

Thank you for your comments, dated and received by the National Park Service (NPS) on September 16, 2021, on the draft *Phase IA Archeological Assessment, Comprehensive Trail System Plan and Environmental Assessment, Catoctin Mountain Park, Frederick and Washington Counties* (August 2021), which was prepared in association with the above-referenced undertaking pursuant to Section 106 of the National Historic Preservation Act.

AECOM, the contractor who prepared the report, incorporated MHT's comments in the enclosed final *Phase IA Archeological Assessment* (December 2021). They have also prepared the enclosed *Section 106 Assessment of Effects Report, Cultural Resources Technical Memorandum* (December 2021).

Secretary of the Interior-Qualified subject-matter experts (SME) on staff at the National Park Service (NPS) National Capital Area Office (NCA), Resource Stewardship & Science-Cultural Resources, and Catoctin Mountain Park (Park), Resources Division, have reviewed both the *Phase IA Archeological Assessment* and the *Section 106 Assessment of Effects* and recommend that this plan will have no adverse effect on historic properties, with the caveat that as the details of this plan are refined, including identifying the precise locations of new trails and trail features, the NPS will complete separate Section 106 activities in consultation with MHT. Individual SME comments and recommendations include:

Park Architectural Historian: This project, an overall plan for the trail system at Catoctin Mountain Park, will have no adverse effects on historic properties. As the specifics of this plan, such as precise locations for new trails and features, are developed and designed, the NPS will conduct additional Section 106 compliance activities in consultation with the State Historic Preservation Office and Tribal Historic Preservation Offices.

NCA Archeologist: Phase 1a archeological identification efforts have NOT examined all locations for proposed ground disturbance. Shovel testing for historic property identification and evaluation, and subsequent Assessment of Effects required for: 1) all NEW trail construction; 2) all reroutes; and 3) all new parking areas where shovel testing has not been previously performed.

NCA Historic Landscape Architect: The AOE did not examine all locations for historic trails and show



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impacts directly to these trail systems and the larger cultural landscape. For each phase of trail design development and construction, these trail segments will need to be identified and full 106 will be needed before construction can proceed.

We are enclosing the final *Section 106 Assessment of Effects, Phase IA Archeological Assessment*, and NPS Planning, Environment, and Public Comment (PEPC) documentation to assist you in your review of this project.

We respectfully request your concurrence that this proposed Comprehensive Trail Plan, in general, will have no adverse effect on historic properties, provided that, when we define the specifics of this plan, the NPS complete separate Section 106 activities in consultation with MHT.

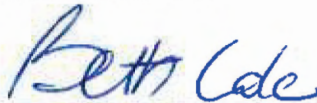
If you have questions or concerns about this project, please do not hesitate to contact Katie Wackrow, Cultural Resources Program Manager, Catoctin Mountain Park, by phone at (229) 815-0051 or by email at kathleen_wackrow@nps.gov and Lindsey Donaldson, Chief of Resource Management, Catoctin Mountain Park, by phone at (301) 712-6761 or by email at lindsey_donaldson@nps.gov.

Sincerely,

**RICHARD
SLADE** Digitally signed by
RICHARD SLADE
Date: 2021.12.13
10:08:28 -05'00'

Rick Slade
Superintendent
Catoctin Mountain Park

I concur that the above-described project will have no adverse effect on historic properties under jurisdiction of Catoctin Mountain Park.



State Historic Preservation Officer



Date

Enclosures: Section 106 Assessment of Effect, Phase IA Archeological Assessment, and NPS PEPC Form
Cc: Catoctin Mountain Park Cultural Resources Program Manager and Chief of Resource Management