



Chisha-Foka Multi-Use Trail Extension Project

Environmental Assessment
January 2024



Photo: National Park Service

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Acronyms and Abbreviations

AASHTO	American Association of Highway and Transportation Officials
BCE	Before Common Era
BMP	best management practice
CFR	Code of Federal Regulations
EA	Environmental Assessment
FONSI	Finding of No Significant Impact
GHG	greenhouse gas
IPaC	Information for Planning and Consultation
MDAH	Mississippi Department of Archives and History
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NST	National Scenic Trail
Parkway	Natchez Trace Parkway
PEPC	Planning, Environment, and Public Comment
Trail	Chisha-Foka Multi-Use Trail
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
WSOF	Wetlands Statement of Findings

CHAPTER 1: PURPOSE AND NEED FOR ACTION

Introduction

The Natchez Trace Parkway (Parkway) is a national park with a designed landscape providing visitors with a 444-mile recreational and scenic drive through Mississippi, Alabama, and Tennessee. It was established as a unit of the National Park Service (NPS) by an act of Congress in 1938 to commemorate the Old Natchez Trace, an overland route connecting Nashville, Tennessee, and Natchez, Mississippi. As one of the oldest transportation routes in North America, its human use dates to 8,000 BCE (Before Common Era).

The Chisha Foka Multi-Use Trail (Trail) is an approximately 10-mile paved path on Parkway lands from milepost 95.8 to 105.6 in the Jackson, Mississippi, metropolitan area. The Trail was originally analyzed in a September 1995 Multi-Use Trail Study Environmental Assessment (EA). In a 1996 Finding of No Significant Impact (FONSI), the NPS approved the preferred alternative for building the Trail and anticipated that it would be constructed in phases. To date, approximately 10 miles of Trail have been constructed (see Figure 2 on the following page). The proposed 2.5-mile Trail extension is a portion of the Trail route analyzed in the 1995 EA, but nearly 30 years have passed since that analysis was conducted. In that time, there have been changes in existing conditions, trends, and corresponding environmental consequences related to the proposed Trail extension. Accordingly, this EA considers the proposed construction and operation of the 2.5-mile Trail extension.

The NPS, in cooperation with the Federal Highway Administration (FHWA), is preparing this EA. In accordance with Council on Environmental Quality (CEQ) regulations at 40 CFR § 1501.7 and § 1501.8, the NPS is the lead agency and the FHWA is participating as a cooperating agency. The FHWA has provided technical expertise in designing the proposed Trail extension and assisted with preparation of this EA. As a cooperating agency, the FHWA intends to rely on and adopt this EA for its decision.

This EA was prepared to meet the NEPA requirements of both the NPS and FHWA. The EA is prepared in accordance with the Department of the Interior NEPA regulations as Part 516 of its Departmental Manual (516 DM; Department of the Interior 2020), the NPS Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making (National Park Service 2011) and the accompanying NPS Handbook 12 (National Park Service 2015). The FHWA's NEPA regulations are codified at 23 CFR Part 771.

Purpose and Need

The purpose of the proposed 2.5-mile extension is to continue construction of the Chisha Foka Multi-Use Trail near Jackson, Mississippi, as described in the 1995 EA. Implementation of the proposed Trail extension would improve recreational experiences for non-motorized users and enhance interpretation opportunities along this section of the Parkway.



Figure 1. Existing Chisha-Foka Multi-Use Trail terminus.

The needs for the proposed Trail extension include developing a logical terminus to the Trail corridor and providing access and improved connectivity to the southern end of the Trail. The current Trail alignment terminates at a dead-end in a field without amenities or supporting facilities (see Figure 1). Access to this part of the Trail is limited; users must currently park several miles to the north of the proposed Trail segment. The proposed new Trail segment improves access by connecting to the existing Osburn Stand Information Display parking lot at milepost 93.5.

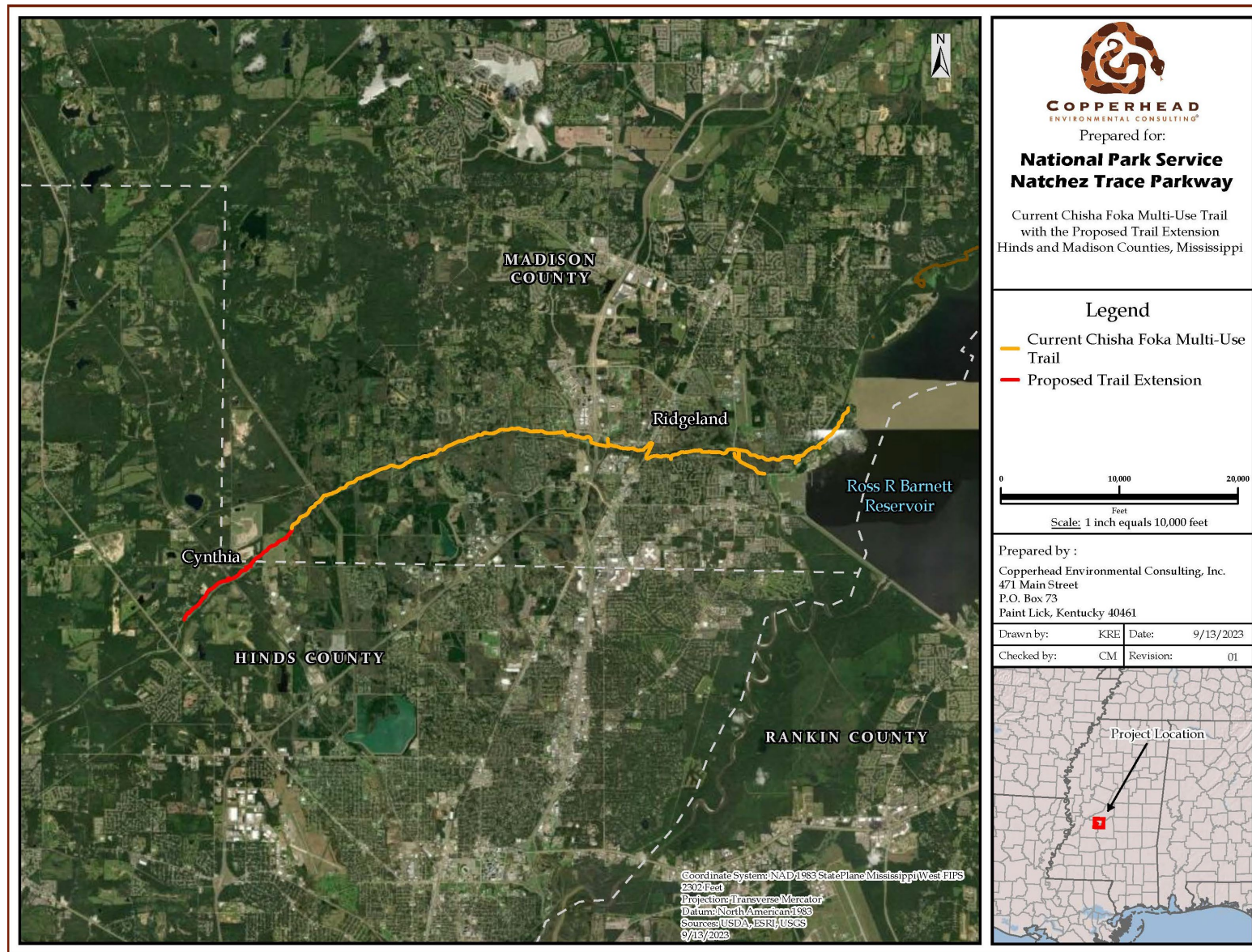


Figure 2. Location of existing and proposed Chisha-Foka Multi-Use Trail segments.

Impact Topics Retained for Further Analysis

Impact topics are derived from issues identified during internal and public scoping. They represent resources that could be affected, either beneficially or adversely, by implementing any of the proposed alternatives. When determining whether to retain an issue for more detailed analysis in this EA, the interdisciplinary team considered, among other things, whether:

- The environmental impacts associated with the issue are central to the development of the proposed Trail extension or of critical importance;
- A detailed analysis of environmental impacts related to the issue is necessary to make a reasoned choice between alternatives;
- The environmental impacts associated with the issue are a big point of contention among the public or other agencies; or
- There are potentially significant impacts to resources associated with the issue.

The NPS used an interdisciplinary review process, existing studies and data, and public comments to determine which resources would likely be affected by this project. The following topics are carried forward for further analysis:

- Soils
- Wetlands
- Vegetation
- Visitor Use, Safety, and Experience

Impact Topics Dismissed from Further Analysis

The following presents an overview of impact topics that were considered for full analysis but were ultimately dismissed from further analysis in this EA.

Air Quality

Hinds and Madison counties are in attainment for primary air quality standards established by the US Environmental Protection Agency. Air quality impacts from construction of the Trail extension and vehicle emissions from users traveling to Trail parking areas would not measurably impact air quality standards and, therefore, this impact topic was dismissed.

Archeology, Cultural Landscapes, and Ethnographic Resources

Section 106 of the National Historic Preservation Act (NHPA) (36 CFR, Part 800) requires federal agencies to take into account the possible effects of their proposed actions (or undertakings) on historic properties. Throughout the Section 106 process, the agency must consult with the appropriate SHPO, federally recognized tribes that have an interest in the undertaking, and any other party with a vested interest in the undertaking. TVA is coordinating its Section 106 compliance with NEPA's requirement to assess adverse impacts on cultural or historical resources.

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The NPS prepared an assessment of effect to comply with the requirements of Section 106 of the NHPA as amended (54 USC 306108), and its implementing regulations (36 CFR 800). In summary, the report found archeological and cultural resources present, however, no adverse effects were identified.

The Parkway is considered National Register of Historic Places (NRHP) eligible by the NPS and the SHPO under Criterion A for its association with a number of events that have made significant contributions to the broad patterns of American history, and for its designed cultural landscape (MDAH 2016).

An archeological survey of the Trail extension corridor completed in 2022 by the Southeast Archaeological Center identified no archeological sites eligible for the NRHP. Three sites discovered during a previous survey are in the project area, but were determined to be not eligible for listing on the NRHP based on severe disturbance and lack of historical significance (NPS 2022). The proposed project would not adversely alter the cultural landscape which includes the historic integrity, setting, and feeling of the Parkway. No ethnographic resources are present in the project area. For these reasons, archaeology and ethnographic resources were not carried forward for further analysis.

The 1995 EA (pp. 44-45), assessed impacts on the Parkway's cultural landscape design and visual quality. Several measures were identified to minimize visual impacts. These include partially screening or softening sections of the Trail and views of Trail bridges with vegetation, not striping the Trail surface, using appropriate materials and colors to help blend manmade elements into the natural surroundings of the park lands, limiting rails to a maximum height of 42 inches, and avoiding caging of the Trail bridges. The proposed Trail extension analyzed in this EA includes similar design features to minimize adverse impacts. For these reasons, cultural landscapes was not carried forward for further analysis.

Agency consultation was initiated with the Mississippi Department of Archives and History (MDAH; Mississippi's State Historic Preservation Office) to comply with Section 106 of the NHPA. A February 3, 2023, letter was mailed requesting MDAH concurrence that there would be no adverse effect from implementation of the proposed project. In a letter dated March 2, 2023, MDAH concurred with the no adverse effect determination (Appendix C).

Climate Change

Climate change refers to the long-term shifts in temperature and weather patterns in Earth's local, regional, and global climates whether from natural or man-made drivers. Differing from normal weather variability, climate change looks at the long-term trends and data versus the short-term day-to-day or year-to-year weather changes. Natural weather patterns, such as El Nino, volcanic activity, and variations in Earth's orbit can drive and contribute to climate change. However, since the early 1900s human activity has been the main contributor to climate change due to fossil fuel emissions increasing the amount of greenhouse gas (GHG) in the atmosphere. Elevated heat trapping GHG levels in the atmosphere have led to a global temperature increase of about 1.1°C degrees from 1901 to 2020 (NOAA 2021).

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Climate change impacts can include changes in rainfall resulting in flooding or droughts, heat waves, ocean warming and acidification, melting of the polar ice caps, and a rise in sea level. These impacts can lead to reduced air and water quality, changing geographic ranges of ecosystems as well as plant and wildlife life cycles, displacement of coastal communities, and agricultural availability and production. Impacts from climate change disproportionately affect socially and economically disadvantaged groups of people and is also considered an environmental justice issue.

The US Environmental Protection Agency predicts that in the future Mississippi will become warmer with more severe droughts and floods and its coastline will be subject to the effects of sea level rise. The changing climate could also lead to an increase in damage from tropical storms, a reduction in crop yields, and an increase in heat-related illnesses (EPA 2016).

The proposed Trail extension would be designed to withstand extreme weather events and projected climate change impacts such as an increase in tropical storm frequency and intensity. This includes appropriately designed culverts to manage water flow and soil erosion.

Construction activities associated with implementation of the proposed action would contribute to increased GHG emissions, but such emissions would be short-term. The use of a bicycle or an e-bike as an alternative to driving a passenger car has the potential to reduce carbon dioxide, a GHG emission, but the volume of such use on the Trail extension is not anticipated to result in quantifiable impacts on GHG emissions or regional or global climatic patterns. As such, any effects on climate change would not be discernible at a regional scale. Therefore, the proposed action's contribution to climate change was dismissed from further analysis.

Environmental Justice

Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (1998) requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities.

Portions of Hinds and Madison counties contain both minority and low-income populations (EPA 2023); however, environmental justice was dismissed as an impact topic for the following reasons:

- The NPS will actively solicit public participation as part of the planning process and give equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.
- Implementation of any alternative would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse effects on any minority or low-income population.
- The environmental impacts associated with implementation of any alternatives would not disproportionately affect any minority or low-income population or community.
- Implementation of any alternatives would not result in any identified environmental effects that would be specific to any minority or low-income community.

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- The economic impacts resulting from implementation of any of the alternatives would not disproportionately affect minority or low-income populations. In addition, the park staff and planning team do not anticipate that the impacts on the socioeconomic environment would alter the physical and social structure of nearby communities.

Floodplains

Executive Order 11988 “Floodplain Management” (1977) requires all federal agencies to avoid construction within the 100-year floodplain unless no other practicable alternative exists. The NPS 2006 Management Policies and Director’s Order 77-2 Floodplain Management strive to preserve floodplain values and minimize hazardous floodplain conditions. Because the proposed Trail extension would not be located within a 100-year floodplain, this impact topic was dismissed from further consideration.

Indian Trust Resources

Secretarial Order 3175 mandates any anticipated impacts to Indian trust resources from proposed projects or actions by the Department of Interior agencies be explicitly addressed in environmental documents. The federal Indian trust responsibility is a legally enforceable fiduciary obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal law with respect to American Indian and Alaska Native tribes.

The lands in proximity to the Parkway and proposed action are not held in trust by the Secretary of the Interior. Therefore, Indian Trust Resources was not analyzed further.

Land Use

The proposed Trail is consistent with NPS management of Parkway lands. The NPS coordinated with easement holders including the Canadian National Railway and Mississippi Department of Transportation to avoid impacts to existing infrastructure including railroads, utilities, and public roads.

Construction and operation of the proposed Trail would reduce the amount of land available for agricultural permits on NPS property but is not anticipated to preclude this use from the surrounding area. One lessee has deeded access to move their livestock through the Trail extension corridor and cross under the Parkway to their leased pasture on the other side of the Parkway. This lessee’s access would be unaffected. The amount of land available for agricultural practices within the Trail extension corridor would be reduced and existing fencing would need to be adjusted to account for the Trail extension. The NPS would coordinate with the lessee to revise their permit conditions accordingly. Leased land use would remain largely agricultural. For these reasons, land use was not carried forward for detailed analysis.

Prime Farmland

Prime farmland soils are defined as land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops (USDA NSSH Part

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622.03). Impacts to prime farmland were dismissed as an issue because coordination with the USDA NRCS during preparation of the 1995 EA determined that since the NPS lands were acquired for the Parkway with dedicated use, the land is not considered prime farmland under the Farmland Protection Policy Act (NPS 1995 pg. 53).

Night Skies

Trail use would be limited to daytime hours. Night skies was dismissed because no lighting along the Trail extension is proposed and there would be no nighttime construction activities that would affect the night sky.

Soundscapes

Natural sounds (e.g., wind blowing through trees, birds calling) and vehicle traffic are the predominate contributors to the existing soundscape near the proposed Trail extension. This portion of the Parkway has an average of 5,500 vehicles daily. Once construction is complete, the existing and proposed Trail would be limited to non-motorized uses and, therefore, the proposed Trail extension is not expected to significantly impact current soundscapes.

Species of Special Concern

The United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool identified three federally listed or proposed species with potential to occur in the project area: the northern long-eared bat (*Myotis septentrionalis*), ringed sawback turtle (*Graptemys oculifera*), and alligator snapping turtle (*Macrochelys temminckii*)(Appendix C). Due to the expected listing, the federally proposed endangered tricolored bat (*Perimyotis subflavus*) was also considered.

A records search for federally listed species occurrence records within two miles of the project area was requested from the Mississippi Natural Heritage Program (MNHP). No federally listed species occurrences were identified in the records request. Although there are no occurrence records for federally listed species, trees in the project area could provide suitable roosting habitat for the federally endangered northern long-eared bat and federally proposed endangered tricolored bat. To minimize impacts on these species, trees would be cleared during the inactive season (November 15 – March 31). Based on the USFWS Northern Long-eared Bat Rangewide Determination Key, the Project is not located within 0.5 miles of a known hibernacula or within 150-ft of a known maternity roost for the northern long-eared bat. Habitat for the federally threatened ringed sawback turtle (wide rivers with moderate to strong currents) is not present within the project area. Habitat for the proposed threatened alligator snapping turtle (large rivers and major tributaries, but also small streams, bayous, canals, swamps, lakes, reservoirs, and ponds) is present in linear wetlands in the project area. The USFWS has proposed but not yet finalized an Endangered Species Act Section 4(d) rule for the alligator snapping turtle that would prohibit harvest and promote the conservation of the species. Because linear wetlands would be crossed with bridges, impacts on habitat would be minimized. The NPS submitted a letter to the USFWS on November 16, 2023, with additional project information and a request for concurrence with the NPS's effects determinations of "may affect, not likely to adversely affect" for the northern long-eared bat and alligator snapping turtle and "no effect" for the ringed sawback turtle. The NPS

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also assessed the potential for effects on state-listed species. The MNHP identified five state-listed species known to occur within two miles of the project area: southeastern myotis (*Myotis austroriparius*), purple fringeless orchid (*Platanthera peramoena*), Webster's salamander (*Plethodon websteri*), American bladdernut (*Staphylea trifolia*), and Louisiana trillium (*Trillium ludovicianum*). These five species are commonly associated with floodplains, nutrient rich bottomlands, and marshes/swamps. Minimization measures and best management practices (BMPs) outlined in Chapter 2 will be followed to reduce impacts to these habitat and species. Riverine wetlands within the project area are assessed separately under the "Wetlands" impact topic in Chapter 3.

Because adverse effects are not likely to occur under the proposed action, species of special concern is not carried forward for detailed analysis.

Visual Resources

The Parkway has been designated an "All American Road" scenic byway. A scenic byway is considered to have roadsides and viewsheds with scenic, natural, cultural, historic, archaeological, and/or recreational value worthy of preservation, restoration, protection, and enhancement. The Parkway has all of these values. Scenic views are valued both for their beauty and as a way to connect people with culture and history. The NPS Organic Act (16 U.S.C. §§ 1, 2, 3 and 4) makes the NPS responsible for preserving important natural, cultural, and historic views into the future.

The 2.5-mile Trail extension would have minor visual impacts on the Parkway. Much of the Trail would be visible from the Parkway, including where elevated grading is used to cross over roads and the railroad, and where raised features such as bridge railings are used over stream crossings. However, the elevated grading would also reduce Parkway views of the roads and railroad along with neighboring land uses that may not be consistent with the Parkway's designed landscape. In addition, the Trail extension design follows BMPs for visual consideration to conserve the beauty and integrity of the Parkway. Because the Trail extension fits with surrounding elements and adds to an existing trail, it would not detract from the existing scenic atmosphere. Therefore, visual resources are not carried forward for detailed analysis.

Water Resources and Water Quality

The project corridor includes several water features, including streams and wetlands. The proposed Trail extension would cross five of these features. The Clean Water Act of 1972 was established to regulate discharges of pollutants into US waters and regulate quality standards for surface waters. The development of an additional 2.5 miles of Trail would not contribute to long-term impacts on water quality at the park. Erosion control methods would be used during ground disturbing construction, which would minimize the amount of sediment. Riverine wetlands within the project area are assessed separately under the "Wetlands" impact topic in Chapter 3. Water quality could be affected by stormwater runoff if there was an increase in vehicles visiting the Parkway, where contaminants such as grease, oil, and antifreeze could be flushed into waterways by rainfall events. Mitigation measures and BMPs outlined in Chapter 2 would reduce overall impacts to stormwater. Examples include the use of erosion and sediment controls such as silt fencing, temporary diversion channels, and sediment filter bags to reduce runoff into flowing

waters. As a result, impacts would be negligible, and water resources and water quality is not carried forward for detailed analysis.

Wildlife and Habitat

The NPS strives to maintain all components and processes of naturally evolving park unit ecosystems, including the natural abundance, diversity, and ecological integrity of animals (NPS 2006). General wildlife habitat is present within the project corridor. Species observed through the wildlife monitoring program by the Mississippi State University Urban Wildlife Information Network include white-tailed deer, eastern gray squirrel, eastern cottontail rabbit, gray fox, Virginia opossum, raccoon, and birds.



Figure 3. Representative photograph of forested area along the proposed Chisha-Foka Multi-Use Trail extension.

The Trail extension would occur in an area that experiences frequent human visitation from Parkway visitors and users on the nearby existing Trail segment. Typically, wildlife avoid these areas during the daylight hours to avoid humans. Public use of the Trail extension could increase the risks of impacts to wildlife, but there would likely be a low incidence rate of interactions due to wildlife avoiding the Trail extension.

Trail construction and operation would result in vegetation disturbance, including removal of vegetation and disturbance to soils. However, only a minor amount of vegetation removal would occur and the effect on wildlife is anticipated to be insignificant.

Trail construction and operation would introduce additional noise, which has the potential to disturb wildlife in the general area. However, construction-related noise would be temporary and

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sporadic, and the Project Area currently experiences frequent vehicle noise from Parkway traffic during daytime hours. Existing sound conditions would resume following construction activities. As a result, wildlife are not anticipated to avoid the area over the long term. Therefore, long term effects from construction would be imperceptible on wildlife and wildlife habitat and this resource is not carried forward for detailed analysis.

CHAPTER 2: ALTERNATIVES

This EA analyzes the potential environmental consequences of two alternatives. The elements of these alternatives are described in detail in this chapter. Impacts associated with the actions proposed under each alternative are outlined in the “Affected Environment and Environmental Consequences” chapter of this EA. In addition, several other approaches to enhance the Trail and non-motorized visitor experience were dismissed from further consideration. These concepts are described in this chapter under “Alternatives Considered but Dismissed.”

Alternative 1: No Action

Under Alternative 1, no action would be taken and the Trail extension would not be constructed. The current Trail alignment would continue to terminate in a field without amenities or facilities. Non-motorized use of the existing Trail would continue.

Alternative 2: Proposed Action / Preferred Alternative

The NPS, in cooperation with the FHWA, is proposing construction of a 2.5-mile extension to the existing Trail along the Natchez Trace Parkway in Hinds and Madison counties, Mississippi.

The proposed action includes construction and operation of a 2.5-mile long and 10-foot-wide paved Trail parallel to and within the Parkway boundary from approximately milepost 93.5 to milepost 95.9 near Jackson, Mississippi. This 2.5-mile portion of the Trail would follow the alignment identified in the 1995 EA (see Figure 4).

The Trail would be constructed using asphalt pavement. The maximum width of the paved surface would be 10 feet (see typical cross sections in Appendix A). The Trail is designed to comply with accessibility requirements under the Architectural Barriers Act (1968) and the Americans with Disabilities Act (1990) to provide access for all visitors, regardless of mobility limitations.

Construction Process

The Trail would be constructed with methods designed to limit the construction footprint/potential impact area. In total, construction is anticipated to last approximately 540 days.

Land disturbing activities would include several phases, including clearing and grubbing, embankment, grading, and placement of culverts. Prior to initiating surface disturbing activities, crews would install perimeter erosion and sedimentation controls (e.g., silt fence) adjacent to all wetlands and flowing waters. Surface vegetation would be removed and uneven ground surfaces leveled within the construction corridor. The total width of the graded subbase would be approximately 18 feet, comprised of aggregate (rock). On top of the subbase there would be a 14-foot-wide base of cement treated aggregate. For the Trail surface, hot mix asphalt would be overlaid on the aggregate to a depth of 3 inches to create the 10-foot-wide Trail. All removed materials would be reused within the construction corridor where applicable.

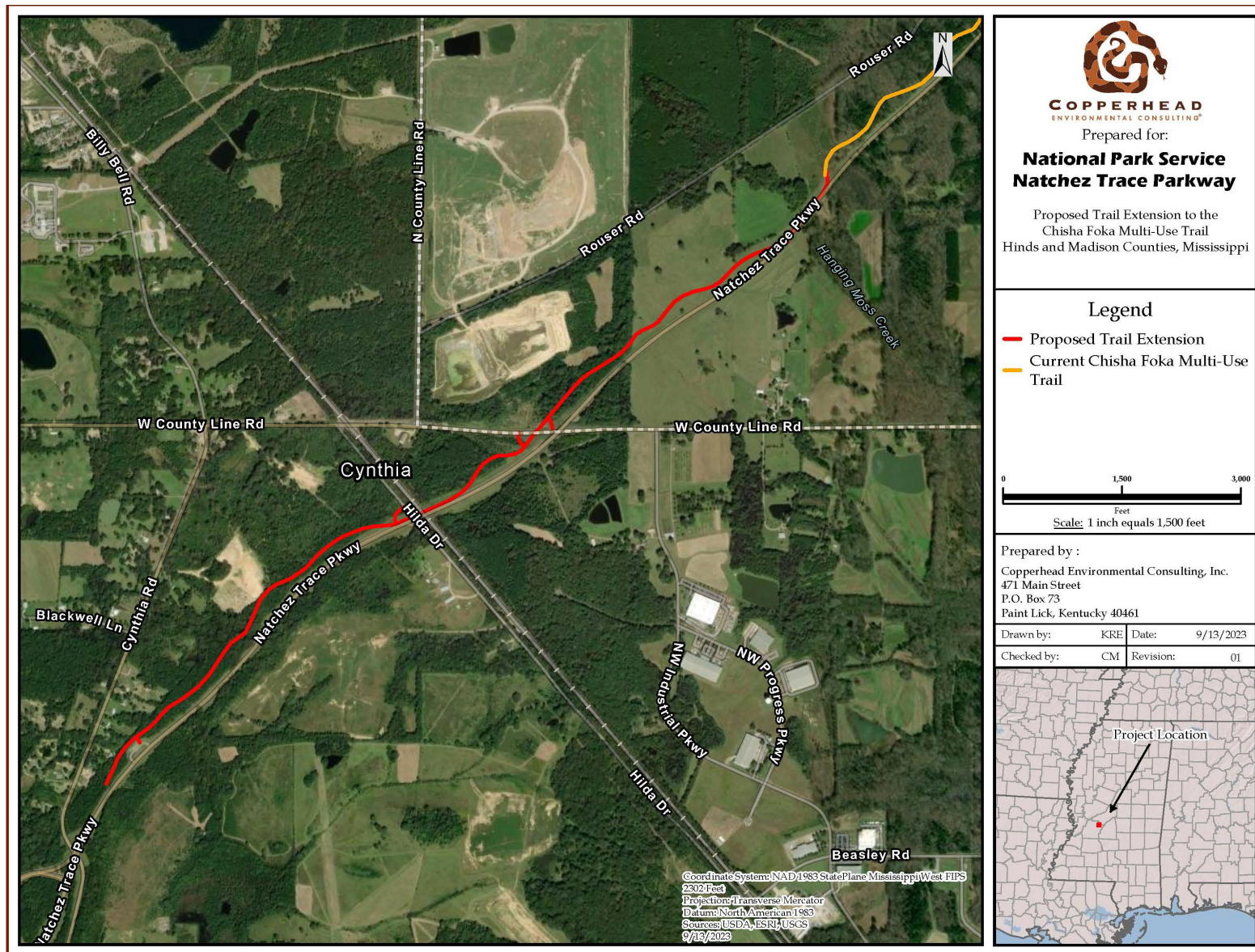


Figure 4. Location of the proposed Chisha-Foka Multi-Use Trail extension.

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The width of the construction footprint would vary according to the terrain and Trail feature. For example, a wider footprint would be required to build up the Trail surface where it would cross existing roads or the Canadian National/Illinois Central railroad. Because of this variability, this EA conservatively assumes that there could be surface disturbance associated with Trail construction up to 65 feet (approximately 20 meters) in either direction from the Trail centerline, an area that totals 33.2 acres. The Trail extension would cross up to five riverine wetlands and two ditches.

Construction vehicles would access the project area from public roads as specified in the design plans, including Livingston Road and Agency Lane. Staging areas on NPS lands would be limited to existing paved parking areas and previously disturbed areas. All staging areas must be approved by the NPS and no new disturbed areas would be established for staging.

Allowable Uses

Allowable uses on the proposed Trail extension would be consistent with those on the existing Trail, which are designated in the Superintendent's Compendium of Regulations and include cycling, walking, jogging, skating, skateboards, and non-motorized (non-gasoline powered) scooters. As discussed in the NPS Bicycle Rule Compliance section of this EA, bicycle use would be consistent with regulations at 36 CFR 4.30 (the Bicycle Rule).

No equestrian use would be allowed on the Trail. Some electric assisted modes of transportation would be permitted, such as motorized wheelchairs. Electric bicycles, known as e-bikes, would be allowed. NPS regulations defines an electric bicycle as a two to three wheeled cycle with an electric motor of not more than 750 watts and fully operable pedals that meets the requirements of one of three defined classes. The three known classes of electric bikes are presented below.

- Class 1: Electric bicycle equipped with a motor that provides assistance only when the rider is pedaling and ceases assistance when the bicycle reaches the speed of 20 miles per hour.
- Class 2: Electric bicycle equipped with a motor that may be used exclusively (throttle) to propel the bicycle and ceases assistance when the bicycle reaches the speed of 20 miles per hour.
- Class 3: Electrical bicycle equipped with a motor that provides assistance only when the rider is pedaling and ceases assistance when the bicycle reaches the speed of 28 miles per hour.

Bicycles with electric motors of more than 750 watts do not meet the definition of an electric bicycle under 36 Code of Federal Regulations (CFR) 4.10 and are managed as motor vehicles. They would not be allowed on the Trail extension.

Mitigation Measures

The NPS identified the following mitigation and best management practices (BMP) measures to avoid, minimize, or mitigate adverse impacts associated with Trail construction and operation.

Table 1. Mitigation measures and best management practices.

Project Phase	Mitigation Measures and Best Management Practices (BMP)
General (applies to all phases of the project)	<ul style="list-style-type: none"> • All equipment and vehicle washing operations would occur off-site. • To protect night sky resources, preserve the existing viewshed, and because the Trail would be open only during daylight hours, no lighting would be installed. • Parking personal vehicles would be within designated areas only. • The project shall include a pre-construction meeting and a final inspection meeting, in addition to the construction contractor's environmental monitoring and regularly scheduled project meetings and site visits. • To minimize the amount of ground disturbance, staging and stockpiling areas shall be in previously disturbed sites, away from visitor use areas to the greatest extent possible • Visitors would be notified of temporary closures, delays, and road hazards during construction to convey appropriate messages and mitigate potential impacts of visitor expectation and experience. • A project schedule would be provided to the public as soon as it is known.
Pre-Construction	<ul style="list-style-type: none"> • United States Army Corps of Engineers (USACE) may issue a 401/404 permit for project actions. A pre-construction notification submitted to the USACE district engineer may be required prior to commencing construction. • Measures would be employed to prevent or control spills of fuels, lubricants, or other contaminants from entering the waterway or wetlands. • The park's Public Information Officer shall be notified at least two weeks in advance of scheduled work and/or when the start date has been established by contract, so that a news release may be sent to the public. • All utilities would be properly marked prior to construction activities by local utility companies. If any utility shutdowns are expected, the contractor would notify park management and district staff. • The project administrator shall inspect all off-road equipment prior to entering NPS lands to ensure that they are free of soil, seeds, vegetative material, or other debris that could contain or hold noxious weed seeds. "Off-road equipment" includes all construction machinery, except for trucks, service vehicles, water trucks, pickup trucks, cars, and similar vehicles.

Project Phase	Mitigation Measures and Best Management Practices (BMP)
	<ul style="list-style-type: none"> • To minimize impacts on listed bats, migratory birds, and rare plants, tree clearing would be limited to November 15 – March 31. • Construction crews would install and maintain BMPs such as the use of wooden construction pallets or timber matting and installation of perimeter erosion and sedimentation controls (e.g., silt fence) adjacent to all wetlands and flowing waters.
During Construction	<ul style="list-style-type: none"> • An environmental monitor would perform regularly scheduled monitoring to ensure any undocumented threatened, endangered, proposed, or candidate species; or nesting species; or milkweed plants are noted and avoided within the project area prior to and during construction. • Erosion control measures such as silt fencing, temporary diversion channels, and check dams would be used to minimize potential soil erosion. They would be removed upon project completion when appropriate. • Wetland mitigation would involve tree planting and seeding of native hydrophytic plants. • During construction, wetlands would be avoided using bridge crossings or retaining walls wherever possible. Increased caution would be exercised to protect these resources from damage caused by construction equipment, erosion, siltation, and other activities with the potential to affect wetlands. Measures would be taken to keep construction materials from escaping work areas, especially near streams or natural drainages. • Runoff from stockpiled materials must be controlled with silt fencing, filter cloth, coir wattles, or other appropriate means to prevent reentry into waterways or wetlands. • Wooden construction pallets would be required to protect wetlands from vehicle impacts. • Sediment filter bags would be used for dewatering operations. Unfiltered discharge must not flow directly into wetlands. • Contractor would be required to maintain silt fence lines once they have been installed and/or repaired. • Construction activities would be halted while the ground is saturated following large rain events to avoid damage to soils and vegetation. • Care would be taken to avoid any rutting caused by vehicles or equipment during construction activities. • Heavy equipment use in wetlands would be avoided if possible. Heavy equipment used in wetlands would be placed on mats, or other measures must be taken to minimize soil and

Project Phase	Mitigation Measures and Best Management Practices (BMP)
	<p>plant root disturbance and to preserve preconstruction elevations.</p> <ul style="list-style-type: none"> • Should construction unearth previously undiscovered archeological resources, work would be stopped in the area of any discovery and the Parkway would consult with the state historic preservation officer/tribal historic preservation officer and the Advisory Council on Historic Preservation, as necessary, according to 36 CFR 800.13, Post Review Discoveries. In the unlikely event that human remains are discovered during construction and if the remains appear to be Native American in origin, the NPS will treat any such remains or objects in accordance with provisions outlined in the Native American Graves Protection and Repatriation Act (1990). In the event that any human remains or associated funerary objects cannot be associated with Native Americans, the NPS will need to coordinate with local law enforcement/coroner as appropriate (ACHP 2023). • Stumps in the Trail extension corridor would be cut as low as possible to the ground to avoid safety hazards. • All construction activities would be confined to daylight hours, excluding emergencies. • Construction materials staging areas would be restricted to previously disturbed sites in upland areas. • Equipment must be free of any fluid leaks (fuel, oil, hydraulic fluid, etc..) upon arrival to the work site and would be inspected at the beginning of each shift for leaks. Leaking equipment would be removed off site for necessary repairs before the commencement of work. • All hazardous waste materials such as oil filters, petroleum products, and equipment maintenance fluids would be stored in structurally sound and sealed containers in the hazardous materials storage area and segregated from the other non-waste materials. Additionally, all hazardous materials would be disposed of in accordance with federal, tribal, and state regulations. • Any waste generated would be properly disposed of in a contract-provided trash bin located at an approved site and hauled off promptly at project completion. • Construction equipment and maintenance materials would be stored at approved staging areas. • All major equipment and vehicle fueling, and maintenance would be performed offsite or on non-pervious surfaces such as concrete or asphalt or deploy a spill containment pad. Absorbent, spill cleanup materials and spill kits would be

Project Phase	Mitigation Measures and Best Management Practices (BMP)
	<p>located at the staging area. All equipment receiving maintenance and vehicles and equipment parked overnight would have drip pans placed beneath them.</p> <ul style="list-style-type: none"> • No work would occur outside of the limits of disturbance without NPS approval.
Post Construction	<ul style="list-style-type: none"> • Ground surface treatment would include grading to natural contours, topsoil and topsoil mantle replacement, seeding, and planting. Pathway edges would be promptly revegetated with NPS approved seed mixes upon completion of pathway construction. All mulch used in re-vegetation efforts shall be certified to be free of weed species. This work would occur as soon after the completion of construction as possible. Soil and fill material must be weed-free and from a source approved by the National Park Service. • Vegetation adjacent to the Trail would be managed to ensure that woody vegetation does not become established. Woody vegetation has contributed to the poor condition of the existing Trail, interfering with drainage, and deforming the Trail surface. Vegetation management could include mechanical or chemical means (e.g., mowing, herbicide, brush removal), in accordance with NPS policies. • Disturbed areas would be reseeded with a native seed mix. To facilitate successful reseeding, seed mixes would consider sun exposure, soil types, and other characteristics. • Downed woody debris resulting from construction activities should not be left in place in a pile due to concerns about fuel loading and potential for wildfire impacts. Woody debris should be cut up and scattered or mulched and applied on site. • Invasive vegetation shall not be mulched and spread when it is in seed. • Remove all flagging and fencing and soil erosion structures (after vegetation is established). • All staging and stockpiling areas would be returned to pre-construction conditions following construction. • All pathway segments would have appropriate signage to inform users of permitted activities and prevent user conflicts. • Annual pathway maintenance would include monitoring and maintenance of drainage features, as necessary. Monitoring of these features shall also occur during construction to ensure that impacts are minimized, and drainage management is implemented.

Project Phase	Mitigation Measures and Best Management Practices (BMP)
	<ul style="list-style-type: none"> Restoration of wetland areas and monitoring requirements would be defined by the mitigation plan documented in the Wetland Statement of Findings.

Alternatives Considered but Dismissed

Reasonable alternatives are those alternatives that meet the purpose and need for action and are technically and economically feasible (46.420(b)). Reasonable alternatives must be rigorously explored and objectively evaluated during the decision-making process (1505.1(e); 46.420(c)). During internal scoping and civic engagement, several alternatives were identified that were considered but ultimately dismissed from further consideration. Descriptions of the alternatives considered but dismissed are provided below with reasons for dismissal.

Natural Surface Trail Extension

Under this alternative, the Trail extension would not be paved and would instead have a natural (e.g., gravel, dirt) surface. Natural surfacing would reduce costs but would limit the type of activities possible. For example, narrow-tire road bicycles, roller blades, and some types of strollers would be difficult and/or unsafe to use on a natural-surface trail. These are all popular activities on the existing Trail; precluding them from use on the extension would not meet the purpose and need for action.

Extension of the Natchez Trace National Scenic Trail

Under this alternative, the Trail extension would be designated as part of the Natchez Trace National Scenic Trail (NST). The NST is currently a 60-mile natural surface hiking trail comprised of five sections along the Parkway. This alternative was dismissed from further consideration because a paved, multi-use Trail extension would be inconsistent with existing sections of the NST.

Connections to Local Greenways

Multiple civic engagement comments requested that the proposed Trail extension include connectivity with existing and planned local greenways. In general, the NPS supports connections with greenways and paths on neighboring public lands. For example, through cooperative agreements with the City of Ridgeland, the existing Trail features connections to greenways in Ridgeland. However, this alternative element was dismissed from further consideration because it would not resolve the purpose and need for action.

Future connections could be considered under a separate environmental review. Cooperative agreements governing these connections would need to account for maintenance of connecting trails, consistency with NPS and municipal planning documents, and the cost of construction.

Connections to trails on private land are not authorized because the Parkway is public land and the establishment of exclusive access conflicts with management of a national park unit.

Completing the Entire Chisha-Foka Multi-Use Trail Route

Several comments expressed in civic engagement requested full completion of the remaining 6 miles of Trail envisioned in the 1995 EA. This alternative was not carried forward for detailed analysis because it is economically unfeasible and funding is not foreseeable: funding projections through 2029 only allow for the proposed 2.5-mile extension.

Use of Elevated Boardwalks to Minimize Wetland Impacts

During the project design phase, the use of elevated wooden boardwalks was considered as a method to reduce impacts on wetlands. This alternative was not carried forward because it would not be consistent with the existing Trail construction methods and surfacing, would not be durable over the long term given the frequent use (including motorized administrative use for maintenance) the Trail receives, and would not facilitate emergency vehicle access (e.g., ambulances).

NPS Bicycle Rule Compliance

Regulations at 36 CFR 4.30 (the Bicycle Rule), provide the administrative pathway to allow bicycle use in non-developed areas on NPS lands. The Bicycle Rule requires a special regulation to authorize bicycle use on new trails outside of developed areas. Prior to doing so, a planning document must evaluate the suitability of existing trail surfaces and soil conditions for accommodating bicycle use, including any maintenance, minor rehabilitation, or armoring that would be necessary to upgrade the trail to sustainable condition.

This EA serves as the planning document for the new Trail segment and analyzes lifecycle maintenance costs, safety considerations, strategies to prevent or minimize user conflict, and methods to protect natural and cultural resources and mitigate impacts. If there is determinations that there is no potential for significant impact, the Superintendent must then provide a written determination that the addition of bicycle use on the Trail extension would be consistent with the protection of the park's natural, scenic and aesthetic values, safety considerations, and management objectives and would not disturb wildlife or park resources, as well as obtain written approval from the Regional Director.

As a requirement to the Bike Rule, the NPS must provide an assessment of impacts from bicycle use to park resources. In Chapter 3: Affected Environment and Environmental Consequences, the NPS describes the impacts to Soils; Wetlands; and Visitor Use, Safety, and Experience associated with the proposed Trail extension allowing for bicycle. The Trail extension was evaluated based on suitability of the Trail surface and soil conditions; lifecycle maintenance costs; safety considerations; strategies to prevent or minimize user conflicts; and methods of protecting natural and cultural resources.

Alternative 2 would allow bicycle and electric bicycle use. The NPS considered the proposed Trail extension's consistency with the parameters of the Bicycle Rule in this EA. The Superintendent has determined that construction of the Trail extension is consistent with the Bicycle Rule and

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would have important benefits for recreation and visitor experience, and localized, minor impacts on natural resources in the park.

According to the Bicycle Rule, the NPS must evaluate the suitability of the Trail surface and soil conditions for accommodating bicycle use. This EA incorporates a sustainable trail design for the proposed Trail extension under Alternative 2. It includes shallower grades and wider turns to support user safety, reduce water pooling and erosion, and minimize the overall maintenance costs.

CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes current environmental conditions in the project area and the potential environmental consequences of implementing each alternative. The issues analyzed here correspond to the impact topics described in Chapter 1 of this EA. Unless otherwise noted, the geographic scope of analysis is a 33.2-acre project area that includes a 40-meter-wide buffer around the proposed Trail centerline. In some places, the project area is less than 40 meters in width because it does not extend across the Parkway itself or onto adjacent private lands. Short-term impacts are those occurring during the anticipated 540-day construction period while long-term impacts would occur or continue to occur after construction and would include those associated with Trail operation and maintenance.

In accordance with the Council on Environmental Quality regulations, impacts of the alternatives are described under each impact topic (40 CFR 1502.16). Where appropriate, mitigating measures for adverse impacts are described and their effect on the severity of the impact is noted. The methods used to assess impacts vary depending on the resource but are generally based on a review of pertinent literature and park studies, information provided by on-site experts and other agencies, professional judgment, and park staff knowledge and insight.

Cumulative Impacts

Cumulative impacts are defined as the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions (40 CFR 1508.7). Cumulative impacts are addressed in this EA for each resource topic. To determine the cumulative impacts, the NPS identified past, current, and reasonably foreseeable future projects in and near the project area. Actions identified for the cumulative impact analyses include the following:

- 1996: Trail approval and subsequent construction of 10 miles of the Trail
- 2010 to 2020: Hinds County's population declined 7% (245,285 to 227,742) and Madison County's population increased 15% (95,203 to 109,145)
- Ongoing: The Parkway regularly receives requests from local municipalities and private neighborhoods to connect to the existing Trail
- Ongoing: The NPS conducts Parkway maintenance and rehabilitation activities (e.g., repaving, restriping, etc.)
- Ongoing: NPS conducts Trail maintenance activities including vegetation management and crack and fog sealing
- Future: Reasonably foreseeable wetland mitigation actions would occur elsewhere on Parkway lands as described in the *Wetlands* section in Chapter 3

Soils

Soils conditions and impacts were assessed within a 40-meter-wide corridor with the proposed Trail extension centerline in the middle. The corridor does not extend across the Parkway itself or

onto adjacent private lands. This corridor encompasses approximately 33.2 acres. According to a query of the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, soil types in the Trail extension corridor include Loring silt loam, 2 to 5 percent slopes, moderately eroded, central (14.9 acres); and Loring silt loam, 5 to 8 percent slopes, moderately eroded central (10.8 acres); followed by Oaklimer silt loam, 0 to 2 percent slopes, occasionally flooded, north (3.4 acres); Grenada silt loam, 2 to 5 percent slopes, eroded (2.3 acres); Riedtown silt loam, 0 to 2 percent slopes, occasionally flooded (1.7 acres), and Grenada silt loam, 2 to 5 percent slopes (0.1 acres; USDA NRCS 2023a). Hydric soils are present in 5.1 acres (15 percent) of the Trail extension corridor.

These soil types are well-drained to somewhat poorly drained silty and loamy soils. They are typically found on uplands and stream terraces (Madison County) and areas dominated by silty soils that are subject to flooding (Hinds County). The 1995 EA identified construction limitations associated with these soil types, including steep slopes, wetness and high shrink-swell potential, flooding, and erosion hazard (NPS 1995 pp. 25-26). Approximately 28 acres (85 percent) of the Trail extension corridor has a moderate soil erosion hazard (road, trail) rating, and 5.1 acres (16 percent) of the Trail extension corridor has a slight soil erosion hazard rating (USDA NRCS 2023b). There has been little change to soil conditions in the Trail extension corridor since the 1995 EA was written: there has been no conversion of undeveloped land, and historical land uses and land cover (e.g., grazing, forested wetlands) has not changed.

The current condition of the existing Trail reflects some of the construction limitations identified in the 1995 EA. As shown below in Figure 5, several sections of the existing Trail suffer from pavement cracking and an uneven surface likely or in part due to the underlying soils.



Figure 5. Differing pavement heights on the existing Chisha-Foka Multi-Use Trail due to problematic soil conditions.

Impacts of Alternative A – No Action Alternative

Under this alternative, the Trail extension would not be constructed. There would be no changes to soil resources implementing the no-action alternative. Past, present, and reasonably foreseeable future actions within the proposed Trail extension corridor are not anticipated to contribute to changes in soil conditions, as these actions would be confined to areas of existing disturbance.

Impacts of Alternative B – Proposed Action Alternative

Construction and operation of the Trail extension would result in short- and long-term, minor, adverse impacts to soils. Excavation and the elimination of current vegetation and leaf litter communities on top of the soil in forested areas would result in soil disturbance and exposure during the clearing and construction phases of the proposed action. These impacts would not result in long-term (extending to a period longer than construction activities may occur) increases in soil loss. Soil loss from runoff from the smooth surfaces (i.e., paved or graded) during the operation of the proposed action would be expected, as well as the erosion of disturbed soils while plant regrowth occurs on the Trail extension corridor after construction. Placement of aggregate for the subbase and paving of the Trail would also result in long-term impacts on soil moisture and the biochemical process of decomposition, nutrient cycling/chemistry, and soil microbiology. However, these impacts would be minor because they would be localized to the construction area and a majority of the soil in the project area would remain intact.

Mitigation measures would be implemented to minimize adverse impacts on soils (see Chapter 2) such as installation of silt fencing to minimize erosion and runoff. In addition, planting native vegetation along the Trail extension corridor after construction would improve long-term soil stability.

Because project area soils have a high shrink-swell potential and a moderate to slight erosion hazard, it is expected that, over time, the Trail extension's asphalt surface would likely experience cracking and heaving problems similar to those along the existing Trail. While this is unlikely to affect soil conditions in the Trail corridor, it is a long-term, adverse impact on the proposed project due to the project area's soil characteristics.

Over the long term, bicycles and other non-motorized uses of the Trail are not expected to adversely affect soil resources because these uses would be confined to paved surfaces. Unauthorized user-created social trails would be closed, but could cause a localized loss of vegetation and soil and potential user safety impacts. In conclusion, there would be minor impacts on soils from soil disturbance and exposure associated with Trail construction and the potential for unauthorized user-created social trails.

The proposed Trail would contribute to the trend of increased soil disturbance in the Trail extension corridor. NPS maintenance activities along the Parkway and the Trail itself could result in additional temporary soil disturbance. However, because the Trail extension corridor is comprised of NPS land, other actions occurring in this area would be conducted by the NPS and adhere to mitigation measures and BMPs similar to those proposed in Chapter 2. Indirect effects from actions on nearby private lands would also be minimized through BMPs required by

stormwater construction permits. Therefore, implementation of the proposed action in combination with other past, present, and reasonably foreseeable future actions within the Trail extension corridor would result in the contribution of minor soil disturbances to the existing cumulative impacts.

Wetlands

Executive Order 11990 "Protection of Wetlands" (1977) directs, "each agency shall provide leadership and shall take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities for (1) acquiring, managing, and disposing of Federal lands and facilities; and (2) providing Federally undertaken, financed, or assisted construction and improvements; and (3) conducting Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulating, and licensing activities."

Wetlands are defined under the Clean Water Act Section 404 and the USACE as "areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."

A Wetlands Statement of Finding (WSOF; NPS 2023a) was prepared and is available as Appendix B to this EA. The WSOF details the results of a wetland delineation that was conducted consistent with NPS Director's Order 71 in March 2023. The delineation identified 15 palustrine wetlands totaling 3.39 acres within the 40-meter-wide Trail extension corridor encompassing the proposed Trail extension, as well as five riverine wetlands totalling 0.05 acres.



Figure 6. Example of a wetland feature within the proposed Chisha-Foka Multi-Use Trail extension corridor

Of the 15 individual wetland features, four palustrine wetland types were found in the Trail extension corridor during the wetland delineation and are grouped by type below. Palustrine wetlands include inland, non-tidal, wetlands dominated by trees, shrubs, persistent emergent, emergent mosses or lichens (USACE). It can also include wetlands lacking vegetation however it must be less than 20 acres in size, not have active wave-formed or bedrock shoreline features, a water depth of less than 2 meters at low water, and salinity less than 0.5 percent (USACE).

Wetland function within the proposed Trail extension corridor is low, with palustrine emergent wetlands bordering agricultural lands and frequently maintained roadsides amassing 1.31 acres (39%) of impacted features. The remaining 2.08 acres (61%) consist of palustrine scrub-shrub and palustrine forested wetlands with young (less than 50 years old) woody stems, an abundance of non-native vegetation, and consequently low ecological value.

Table 2. Summary of delineated wetland resources.

Cowardin Classification Code¹	Description	Preliminary Jurisdictional Determination²	Acres	Percent of total wetlands³
PEM	Emergent, Palustrine	Jurisdictional	1.03	30%
PEM/PSS	Emergent, Palustrine/Scrub-Shrub, Palustrine	Jurisdictional	0.49	14%
PFO	Forested, Palustrine	Jurisdictional	1.83	54%
PEM	Emergent, Palustrine	Isolated	0.04	1%
Riverine	Riverine	Jurisdictional	0.05	1%
Total Acreage of Jurisdictional Wetland Features	--	--	3.39	--
Total Acreage of all Wetland Features	--	--	3.44	--

¹ Classifications are based on professional judgment of actual field conditions. PEM = palustrine emergent; PSS = palustrine scrub-shrub; PFO = palustrine forested.

² Jurisdictional determinations and boundaries when presented are preliminary and are subject to final verification by the USACE.

³ Sums totals of percentages might not equal 100 percent due to rounding errors.

Based on a review of aerial imagery and the results of the 2023 wetland delineation, the location and extent of wetlands in the Trail extension corridor has not changed since the 1995 EA was written. Over time, actions on private lands such as the conversion of wetlands to other uses (e.g.,

agriculture) has likely contributed to the low function and low ecological values of wetlands on NPS lands via erosion, pesticide and fertilizer application, and other pathways.

Impacts of Alternative A – No Action Alternative

Under this alternative, the Trail extension would not be constructed. There would be no changes to wetlands implementing the no-action alternative. Other past, present, and reasonably foreseeable future actions within the proposed Trail extension corridor could contribute to changes in wetlands, particularly any Parkway maintenance or repair actions that overlap existing wetlands. Impacts would be minimized through use of BMPs and NPS-required mitigation.

Impacts of Alternative B – Proposed Action Alternative

Given the prevalence and location of wetlands within the study area and the confinement of potential Trail designs to the corridor of NPS lands between the Parkway and private lands, some filling of wetlands would be required.

Efforts to minimize and provide protective mitigation measures to limit adverse effects on wetlands would be adopted consistent with Director's Order #77-1 and Executive Order 11990 and are documented in Table 1. Staging areas during construction would be relegated entirely to upland portions of the proposed study area to limit the acreage of features impacted by construction. Ultimately, impacts to wetlands under the preferred alternative would be minimized to the maximum practicable extent.

Wetland mitigation would be performed as part of the Proposed Action. Specifically, two areas totaling approximately 14.16 acres have been identified for restoration. These areas are on NPS lands northeast of the intersection of the Natchez Trace Parkway and Highway 363 in Saltillo, MS, approximately four miles north of the Visitor Center. The areas have recently been removed from the Parkway's agricultural lease program and are within the floodplain of the adjacent McDonald Branch and Brock Creek. This location is desirable for mitigation because it has degraded wetland areas that would benefit from restoration of wetland function, is located on Parkway land, and because its removal from the agricultural lease program would not affect the Parkway's designed landscape. Removal also allows the NPS to convert these areas to native vegetation.

Per Director's Order #77-1, mitigation of wetland impacts using the methods proposed in the WSOF and outlined here corresponds to a ratio of 4:1. The proposed restoration of 14 acres would satisfy the NPS policy requiring no-net loss of wetlands within NPS lands. Compensating for impacts to low quality wetland by removing agricultural practices, grading to restore hydrology, and replanting with native vegetation requires a ratio of at least 4:1 (4 acres of enhancement for every acre of impact).

The WSOF contains a detailed description of proposed mitigation activities. In summary, mitigation would involve tree planting and seeding of native hydrophytic plants. Restoration would be completed in three stages: site preparation, planting, and monitoring. The initial site preparation would entail the removal of non-native vegetation and seeding of native seed and/or groundcover species for soil stabilization. Planting of trees would then be conducted during either the spring or fall months to maximize the likelihood of meeting survival criteria for tree planting. A

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planting palette of recommended species based on documentation of surrounding wetlands is provided in the WSOF to assist in replacement of hydrophytic plant communities expected to occur in natural wetlands in the region based on vegetation data collected during on-site surveys. The treatment of non-native vegetation and re-seeding of treated areas could be performed repeatedly during the growing season for two consecutive years following tree planting, and then on an as-needed basis guided by collected monitoring data. If restoration of the compensatory wetland areas follows guidelines listed above then the anticipated timeframe for fully functioning compensatory wetlands is approximately five years. Monitoring would be performed in each of those five years to track the survival of planted trees and native herbaceous plant communities.

In conclusion, implementation of the proposed action would result in long-term adverse impacts on up to 3.44 acres of existing wetlands. Because construction would result in the placement of fill and tree clearing in these wetlands, these impacts would be long-term, occurring over the life of the project. Construction-related impacts would be minimized through use of mitigation measures and BMPs as described in Chapter 2 and the mitigation process outlined in the preceding paragraphs. Mitigation measures and BMPs include the use of silt fencing to minimize runoff into wetlands and sediment filter bags for dewatering to avoid the discharge of untreated water into wetlands.

During operation, recreational activities including bicycling are not anticipated to adversely affect wetlands because these activities would be confined to paved surfaces. Similarly, routine maintenance such as mowing, brush clearing, and asphalt crack sealing is not anticipated to adversely affect wetlands because these actions would not alter wetland values or functions. In conclusion, implementing the proposed action including the proposed mitigation measures would not result in significant loss of wetlands or wetland function and values. The impacted wetlands have been identified as exhibiting low function and low ecological values (see Appendix B) and, with implementation of BMPs, restoration of the 14.16-acre off-site area would compensate for all wetlands impacted by the proposed project. Restoration of the off-site area would enhance the ecological value of the wetlands and surrounding landscape due to the restoration of native habitat and addition of hydrologic storage capacity.

Implementation of the proposed action in combination with other past, present, and reasonably foreseeable future actions within the Trail extension corridor would result in diminished wetland values in the Trail extension corridor. Wetlands within the project area have been modified from construction of the Parkway including installation of culverts on Parkway lands and adjacent private lands. The changing climate with more frequent storms would continue to impact wetland environments and modify vegetation. The proposed Trail extension would contribute to this trend within the Trail extension corridor by permanently converting wetlands to a developed land use (i.e., paved Trail surface), though its effects would be offset by implementing mitigation elsewhere along the Parkway as described above. Cumulative impacts would be minimized because projects on NPS lands would adhere to mitigation measures similar to those proposed in Chapter 2, and indirect effects from actions on nearby private lands would similarly be minimized through BMPs required by state general construction permits. In addition, any other NPS actions affecting wetlands would be offset by the implementation of mitigation requirements in Director's Order #77-1. As a result, the contribution to cumulative impacts on wetlands would be minor.

Vegetation

The NPS Management Policies (2006) and other NPS and park policies provide general direction for the protection of vegetation. The NPS strives to maintain all components and processes of naturally evolving park unit ecosystems, including the natural abundance, diversity, and ecological integrity of plants (NPS 2006).

A review of the Parkway's Vegetation Mapping Inventory Project (NPS 2016) identified nine vegetation communities in the 33.2-acre Trail extension corridor (see Table 4).

Table 3. Vegetation communities in the Trail extension corridor.

Vegetation Community	Acres
Ruderal Mixed Grassland	11.2
Ruderal Pine - (Hardwood) Forest	10.2
Ruderal Groundsel-tree Shrubland	3.1
Southern Oak - (Hardwood) Forest	2.4
Ruderal Sweetgum - (Oak) Forest	1.8
Developed Area	1.5
Ruderal Water Oak Forest	1.4
Ruderal Mixed Hardwood Forest	1.3
Ruderal Blackberry - Greenbrier Shrub Thicket	0.1
Barren Land	0.1
Row & Close Grain Crop	0.1
Total	33.2

Ruderal Mixed Grassland

This community is represented by a highly variable set of community types, all mainly being composed of managed graminoids (grass-like herbaceous plants) and forbs. This community includes actively mowed fields and road edges, as well as abandoned agricultural fields and similar areas.

Ruderal Pine - (Hardwood) Forest

This community type represents a wide variety of specific community types that are all dominated or co-dominated by loblolly pine (*Pinus taeda*). Examples of this community include stands of young loblolly pine and abandoned mature loblolly pine plantations.

Ruderal Groundsel-tree Shrubland

This community is strongly dominated by groundsel-tree (*Baccharis halimifolia*). Terrain in this area is generally flat to gently sloping, with well to moderately drained soils. The tall shrub layers are moderately dense, with fairly sparse short shrub layers, and an unvegetated surface primarily covered by leaf litter and duff or bare soil. Other common woody species include loblolly pine, Sawtooth blackberry (*Rubus argutus*), American elderberry (*Sambucus canadensis*) and

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American elm (*Ulmus americana*). Common herbaceous species include Bushy Bluestem (*Andropogon glomeratus*), broomsedge (*Andropogon virginicus*), and dogfennel (*Eupatorium capillifolium*).

Southern Oak - (Hardwood) Forest

This community type represents areas where the dominant canopy trees are a mixture of cherrybark oak (*Quercus pagoda*), water oak (*Quercus nigra*), and a mixture of non-oak hardwood species, primarily sweetgum (*Liquidambar styraciflua*) or pecan (*Carya illinoensis*), with occasional loblolly pine. The overall composition of these communities is of a mixed-age to mature forest, and they tend to occur in relatively undisturbed settings.

Ruderal Sweetgum - (Oak) Forest

This community type represents forests that are dominated or co-dominated by sweetgum. Due to the successional nature of sweetgum, these forest stands are generally younger to even-aged, although some mature examples exist.

Ruderal Water Oak Forest

This community type represents successional upland forests dominated by water oak. In these areas water oak is generally the only dominant canopy tree, with only occasional instances of cherrybark oak and willow oak (*Quercus phellos*). These communities generally show significant signs of disturbance, and tend to occur on the boundary between wetlands and uplands.

Ruderal Mixed Hardwood Forest

This community type represents a mix of specific communities that have begun to regenerate from past disturbances but still show signs of recent disturbance. These areas are generally dominated by early successional hardwood trees, primarily sugarberry (*Celtis laevigata*) and elm species (*Ulmus* sp.), with occasional sweetgum. The canopy in these areas is generally more open or patchy than that of a closed-canopy mature forest due to the successional nature of the overall vegetation.

Ruderal Blackberry - Greenbrier Shrub Thicket

This community type is represented by vegetation that has begun to succeed from an upland field into one dominated by native shrubs and vines. These areas are strongly dominated by blackberry (*Rubus* sp.) and greenbrier (*Smilax* sp.) growing in dense thickets.

No rare or unique wetland vegetation communities were identified within the Trail extension corridor during a March 2023 wetland delineation.

Current and ongoing vegetation management activities in the Trail extension corridor include mowing along the Parkway, agricultural grazing, and hazard tree removal. Vegetation cover and composition in the Trail extension corridor remain similar to that described in the 1995 EA.

Impacts of Alternative A – No Action Alternative

Under this alternative, the Trail extension would not be constructed and there would be no changes to vegetation community conditions. Other past, present, and reasonably foreseeable future actions within the proposed Trail extension corridor could continue to contribute to changes to vegetation communities, including mowing, non-native invasive species control, and hay pasture cutting. Mowing would continue for permitted hay cutting and maintenance of the designed cultural landscape.

Impacts of Alternative B – Proposed Action Alternative

Construction and operation of the Trail extension would result in short- and long-term adverse impacts on vegetation. During construction, surface-disturbing activities are conservatively estimated to affect the entire Trail corridor. There would be short-term impacts on up to 33.2 acres of vegetation from construction activities (e.g., tree clearing and grading) outside of the Trail's 18-foot-wide subbase. Over the long-term, these impacts would be minimized by reseeding areas of temporary disturbance with an approved native seed mix.

Construction would result in the permanent conversion of approximately 5.5 acres of vegetation to a paved Trail surface and aggregate subbase. In addition, Trail maintenance activities would result in long-term, ongoing adverse impacts on vegetation along the Trail corridor. For example, Trail shoulders would be maintained free of woody vegetation via mowing, herbicide, or other methods. And there would be a second, wider buffer where trees and shrubs would be periodically disturbed to stop trees from being established to keep branches out of the Trail corridor. Other ongoing impacts would include regular removal of hazard trees that pose a threat to visitor safety. Together, these maintenance activities would cause long-term disturbances to vegetation communities including lack of re-establishment of native species, conversion of forested areas to herbaceous vegetation, and a loss of trees and associated wildlife habitat. The need for the Parkway to screen adjacent land development has shifted Parkway vegetation to more forested vegetation, which helps lessen the impacts of forest loss within the park. These changes and the small size of the project area lessen the intensity of impacts.

The NPS would manage and remove exotic and invasive plant species in accordance with the invasive plant management plan and specific Parkway policies. This would help to maintain native vegetation communities and species over the long term. However, having an established trail system within natural forests and grasslands will serve as a long-term vector for non-native species establishment as humans and equipment carry seeds and the open edge and frequently disturbed habitat provide optimal conditions for non-native species.

During operation, recreational activities including bicycling are not anticipated to adversely affect vegetation because these activities would occur primarily on paved surfaces. However, long-term impacts from social trails connections and off-Trail use are common along the current Trail and would be a long-term impact to vegetation.

In summary, Trail construction and maintenance would result in a conversion of existing vegetation to pavement and maintained herbaceous vegetation and would increase the potential for the spread of non-native species along the Trail corridor.

Implementation of the proposed action in combination with other past, present, and reasonably foreseeable future actions would result in long-term changes to vegetation communities within the Trail extension corridor. For example, forested areas have been converted to other uses for the existing Trail and Parkway. In addition, ongoing Parkway and Trail maintenance activities include mowing herbaceous vegetation to prevent re-establishment of woody vegetation. The proposed action would contribute to the existing cumulative impacts to vegetation by expanding the area of herbaceous vegetation and further fragmenting existing forested vegetation communities.

Visitor Use, Safety, and Experience

The park and existing Trail are managed according to the *NPS Management Policies 2006*, which states that park resources and values are to be enjoyed presently and in the future by the people, and the NPS is committed to providing appropriate high-quality opportunities for all visitors (NPS 2006).

The existing Trail is a valued recreational asset for Parkway visitors. Popular recreational activities include walking, running, bicycling, and bird watching. During the 30-day civic engagement comment period that preceded the development of this EA, a total of 123 public comments were received, the vast majority of which were supportive of the proposed Trail extension for reasons of improved visitor experience.

The existing Trail is challenging to maintain due to atypical and extensive repair needs and Parkway staffing and budget shortages. The presence of problematic soils has resulted in a Trail surface that is cracked or uneven in many places, presenting safety concerns. On the existing Trail, both cyclist and hiker accidents have occurred due to deteriorated asphalt conditions. Additionally, the current Trail parallels the busiest section of the entire Parkway (up to 14,000 vehicles daily), and vehicle/cyclist accidents have occurred.

The NPS incurs annual and other costs to maintain the existing Trail. Routine maintenance is estimated to cost approximately \$25,000 per year. In addition, every five to seven years, contractors are hired to perform crack and fog sealing at a cost of approximately \$50,000 per mile. In 2024, the NPS anticipates initiating a \$4,100,000 project for repair of failed areas along 4 miles of existing Trail.

Visitor trends include increasing Parkway visitation, increasing use of the existing Trail, and community requests for connections to the Trail from private neighborhoods and municipalities. NPS data shows that annual Parkway recreation visits increased over the past 10 years from 6,012,740 in 2013 to 6,543,533 in 2022 and that recreation visits typically peak in the spring and fall (NPS 2023b). Although the NPS does not conduct visitor counts on the existing Trail, NPS staff have generally observed a trend of increasing use over the past 10 years. This trend is consistent with a corresponding increase in requests for connectivity with local neighborhoods and municipal greenway systems.

Impacts of Alternative A – No Action Alternative

Under this alternative, there would be no construction and operation of a 2.5-mile extension to the existing Trail. Impacts on visitor use and experience would remain the same, as described in the affected environment section. Maintenance on the current Trail would take place as funding and staffing allow.

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on visitor use and experience within the study area. Nationwide trends towards the development of commercial and residential properties could be foreseeable in the future and may contribute to additional usage of the Trail along with additional requests for more access points to the Trail. Without the 2.5-mile extension and additional access points, the user may experience imperceptible adverse impacts on their overall experience. No change in maintenance costs are anticipated.

Impacts of Alternative B – Proposed Action Alternative

Over the short and long term, construction of the Trail extension would benefit visitor use and experience by providing additional Trail mileage for recreation.

Under the proposed action, short-term adverse impacts to visitor use and experience would be expected due to temporary Trail closures where the extension would meet the existing Trail. However, these impacts would cease with the completion of construction. After construction of the extension, the proposed action alternative would have long-term, beneficial impacts on visitor use and experience from the Trail extension and increased accessibility.

Allowing multiple non-motorized uses on the Trail extension could present opportunities for user conflict, but the width (10 feet) of the Trail would provide sufficient space between users to avoid excessive conflicts. The Trail extension width follows the Federal Highway Administration and the American Association of Highway and Transportation Officials shared use path recommended width for a two-directional shared use path (AASHTO 2012). Additionally, the Parkway has not received reports of unnecessary user conflict on the existing Trail. While there is a perception that e-bikes can be unsafe due to their higher speed, a study of speed data showed that people using e-bikes generally travel at similar speeds as traditional bicycles on roadways, off-street paths, and natural surface trails (Nielsen 2019). Allowing e-bikes on the Trail extension would make the Trail more accessible to older visitors and others who may not visit the Trail with a traditional bicycle or on foot.

The use of Architectural Barriers Act standards to improve accessibility of the Trail would benefit visitors of differing abilities and improve the overall quality of their experience in the project area.

The proposed Trail extension would take visitors near the Little Dixie Landfill, located on private land north and west of the Parkway. Odors from the landfill may negatively affect visitor experiences during certain weather conditions. NPS law enforcement has also observed illegal dumping along non-NPS roadways near this section of the Parkway; if visible from the Trail extension, this could detract from visitor experiences.

Bicycle use on the Trail extension would benefit visitor use and enjoyment by providing an additional location where this activity would be permitted. Lifecycle maintenance costs would be unaffected by bicycle use, as bicycles would not disproportionately contribute to wear and tear of the paved Trail surface. Safety considerations include the potential for accidents with other users and the possibility of accidents resulting from degraded pavement. These impacts would be minimized by signage and outreach encouraging responsible Trail use and by conducting ongoing maintenance over the lifespan of the Trail extension.

Extending the Trail consistent with the proposed action would require the Parkway to maintain more mileage without dedicated funds to do so. Because the Trail extension would be paved, it is likely that the surface would remain in good condition for several years, as it would be more resilient to various usages, and it would reduce potential soil loss from erosion. However, over the long term, cracking and uneven pavement would begin to develop, consistent with the existing Trail. To avoid the potential for safety issues, the Parkway would need to devote additional resources to Trail maintenance; however, doing so may limit staffing available for managing other Parkway resources. Without dedication to Trail maintenance, Trail users would expect long-term moderate impacts as the Trail conditions deteriorate and user safety issues would develop. With sufficient dedication to Trail maintenance, the user would expect long-term beneficial impacts to the proposed action.



Figure 7. Example of crack sealing along the existing Chisha-Foka Multi-Use Trail.

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impact on visitor use and experience within the study area. Similar to the no-action alternative, trends towards the development of commercial and residential properties could be foreseeable in the future and may contribute to additional usage of the Trail along with additional

Chapter 3: Affected Environment and Environmental Consequences

requests for more access points to the Trail. Additionally, visitor trends across the NPS as whole have increased in recent years as more visitors come to recreate and use NPS lands.

As previously described, adverse direct and indirect impacts affecting visitor use and experience from implementation of the proposed action (noise, fugitive dust, and closures of parking areas or overlooks for laydown areas) would likely be temporary in nature. However, the proposed action would result overall in long-term beneficial impacts on visitor user experience. Visitors and recreators would perceive a noticeable beneficial increase to the health and safety aspects of the visitor, the visual and natural environment of the resources, and the functionality of the park from the proposed action.

Overall, the proposed action in combination with past, present, and reasonably foreseeable future actions would contribute to increasing visitation on NPS lands and the associated desire for trail-based recreation. It would likely result in an increased interest in connections to nearby private and municipal lands. And the combination of additional Trail mileage and increasing use would result in greater maintenance needs in an area where the existing Trail suffers from deteriorating conditions and associated safety issues. Without adequate maintenance funding, there may be a longer-term cumulative effect of trail users not feeling that their experiences and safety consideration needs are adequately addressed, however, the implementation of the trail does not contribute significantly to a diminished visitor experience.

CHAPTER 4: CONSULTATION AND COORDINATION

The NPS conducted consultation and coordination with federal and state agencies and other interested parties to identify issues and/or concerns related to park resources. This section summarizes the public involvement and agency consultation and coordination that occurred before and during the preparation of this EA.

Public Involvement

Prior to initiating the NEPA process, the NPS held a 30-day civic engagement comment period requesting public feedback about important issues related to the proposed Trail extension. The 30-day civic engagement comment period was advertised on the NPS PEPC website, on Parkway social media accounts, and through the Parkway's mailing list. The comment period occurred from June 1 – 31, 2023, and a total of 123 submissions were received. Key topics identified in the submissions included benefits of the Trail regarding visitor use and enjoyment, a desire for connectivity with local communities, and consideration of Trail maintenance. No comments were received in opposition to the proposed Trail extension.

The NPS also coordinated with easement holders including the Canadian National/Illinois Central railroad and Mississippi Department of Transportation to avoid impacts to existing infrastructure including railroads, utilities, and public roads.

This EA will be available for public and agency review and comment for a period of 30 days on the NPS Planning, Environment, and Public Comment website.

Agency and Tribal Consultation

Section 106 of the National Historic Preservation Act

Section 106 of the NHPA (36 CFR, Part 800) requires federal agencies to take into account the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment.

Agency consultation was initiated with the Mississippi Department of Archives and History (MDAH; Mississippi's State Historic Preservation Office) to comply with Section 106 of the NHPA. A February 3, 2023, letter was mailed requesting MDAH concurrence that there would be no adverse effect from implementation of the proposed project. In a letter dated March 2, 2023, MDAH concurred with the no adverse effect determination (Appendix C).

All consulting agencies and the public will have an opportunity to further comment on the EA during the public review period.

Separately, the NPS additionally prepared an assessment of effect to comply with the requirements of Section 106 of the NHPA as amended (54 USC 306108), and its implementing regulations (36 CFR 800). In summary, the report found archeological and cultural resources present, however, no adverse effects were identified.

Chapter 4: Consultation and Coordination

During the planning process for this EA, the Parkway contacted the following Tribes to initiate consultation (see Appendix C):

- Alabama-Coushatta Tribe of Texas
- Alabama-Quassarte Tribal Town
- Chickasaw Nation
- Chitimacha Tribe of Louisiana
- Jena Band of Choctaw Indians
- Kialegee Tribal Town
- Mississippi Band of Choctaw Indians
- Muscogee (Creek) Nation
- Poarch Band of Creek Indians
- Thlopthlocco Tribal Town
- Tunica-Biloxi Tribe

Two responses were received: the Chickasaw Nation had no objections to the Project and the Muscogee (Creek) Nation requested a copy of the archaeological survey report for review. The NPS also informed the Tribes of the availability of the EA for review.

Natural Resources Conservation Service

The 1995 EA determined that there would be no effect on prime or unique farmland because the parklands were acquired for the Parkway with dedicated use as such and therefore, the site does not contain prime, unique, statewide, or local important farmland (NPS 1995 pg. 53-54). The NPS has not re-initiated consultation with NRCS because there has been no change in dedicated use or prime farmland.

U.S. Fish and Wildlife Service

The NPS initiated the Endangered Species Act Section 7 consultation process via the USFWS IPaC online tool on August 28, 2023. The NPS submitted a letter to the USFWS on November 16, 2023, with additional project information and a request for concurrence with the NPS's effects determinations of "may affect, not likely to adversely affect" for the northern long-eared bat and alligator snapping turtle, "no effect" for the ringed sawback turtle, and "not likely to jeopardize the continued existence" for the tricolored bat. In a letter dated December 13, 2023, the USFWS provided concurrence with these effects determinations, thus concluding the Section 7 consultation process.

U.S. Army Corps. Of Engineers

Section 404 of the Clean Water Act establishes a program to regulate the discharge of dredged and fill materials into waters of the United States, including wetlands. The USACE establishes permit regulations that specify the procedures and criteria for the issuance of Section 404 permits. The proposed action requires a Section 404 permit for the filling of jurisdictional wetlands and will require compensatory mitigation. The Parkway will obtain the applicable Section 404 permit before construction.

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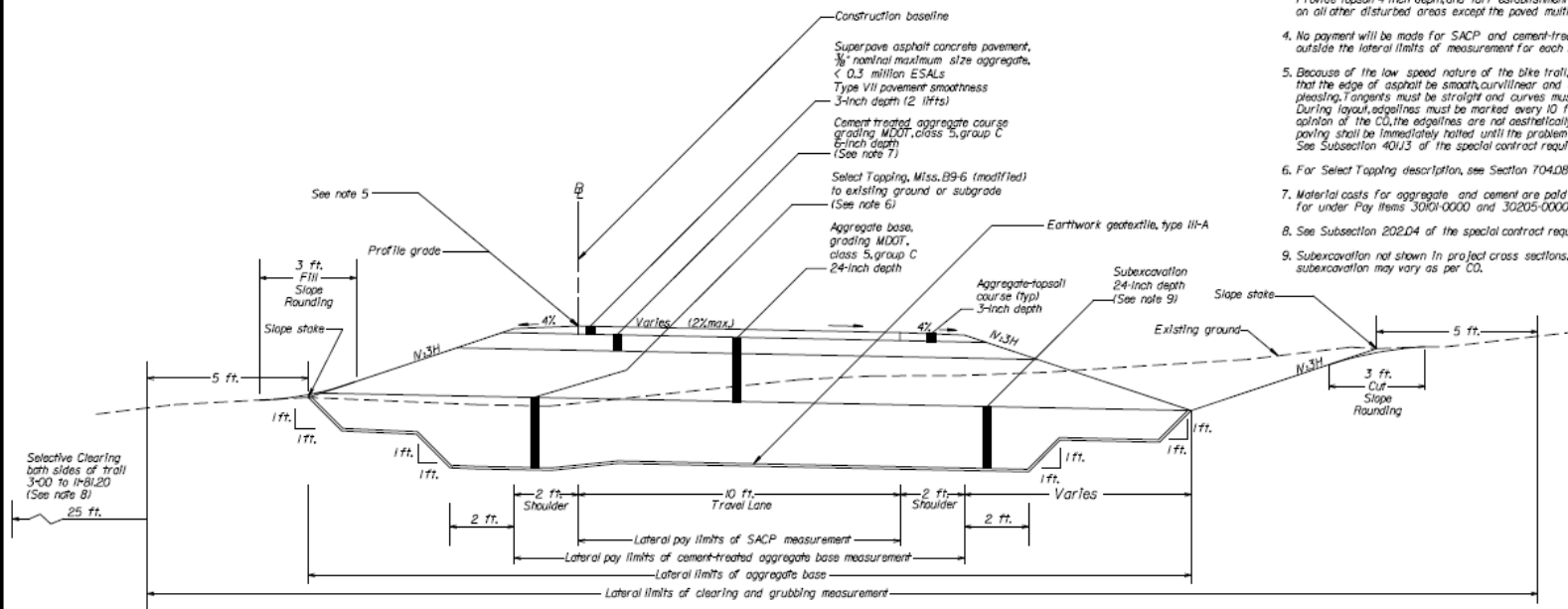
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Appendix A: Trail Design Typical Cross Sections

PHIS NO.	WPS NO.	REG.	STATE	PROJECT	SHEET NO.
55868	604 12995	SE	MS	PRA-NATR 3P17.18	A7

Notes:

1. Cement-treated base shall consist of 4% by weight of ordinary portland cement.
2. Minimum ditch grades are 0.5%. Adjust ditches to provide for proper drainage as directed by the CO.
3. Provide turf establishment on the shoulders. Provide topsoil 4-inch depth, and turf establishment on all other disturbed areas except the paved multi-use trail.
4. No payment will be made for SACP and cement-treated base outside the lateral limits of measurement for each item.
5. Because of the low speed nature of the bike trail, it is critical that the edge of asphalt be smooth, curvilinear and aesthetically pleasing. Tangents must be straight and curves must be uniform. During layout, edgelines must be marked every 10 feet. If, in the opinion of the CO, the edgelines are not aesthetically pleasing, paving shall be immediately halted until the problem is corrected. See Subsection 40U.3 of the special contract requirements.
6. For Select Topping description, see Section 704.08.
7. Material costs for aggregate and cement are paid for under Pay Items 30101-0000 and 30205-0000, respectively.
8. See Subsection 202.04 of the special contract requirements.
9. Subexcavation not shown in project cross sections. Depth of subexcavation may vary as per CO.



MULTI-USE TRAIL
(1+00 to 11+87.42)

0 2 4
SCALE IN FEET

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
EASTERN FEDERAL LANDS HIGHWAY DIVISION
STERLING, VIRGINIA

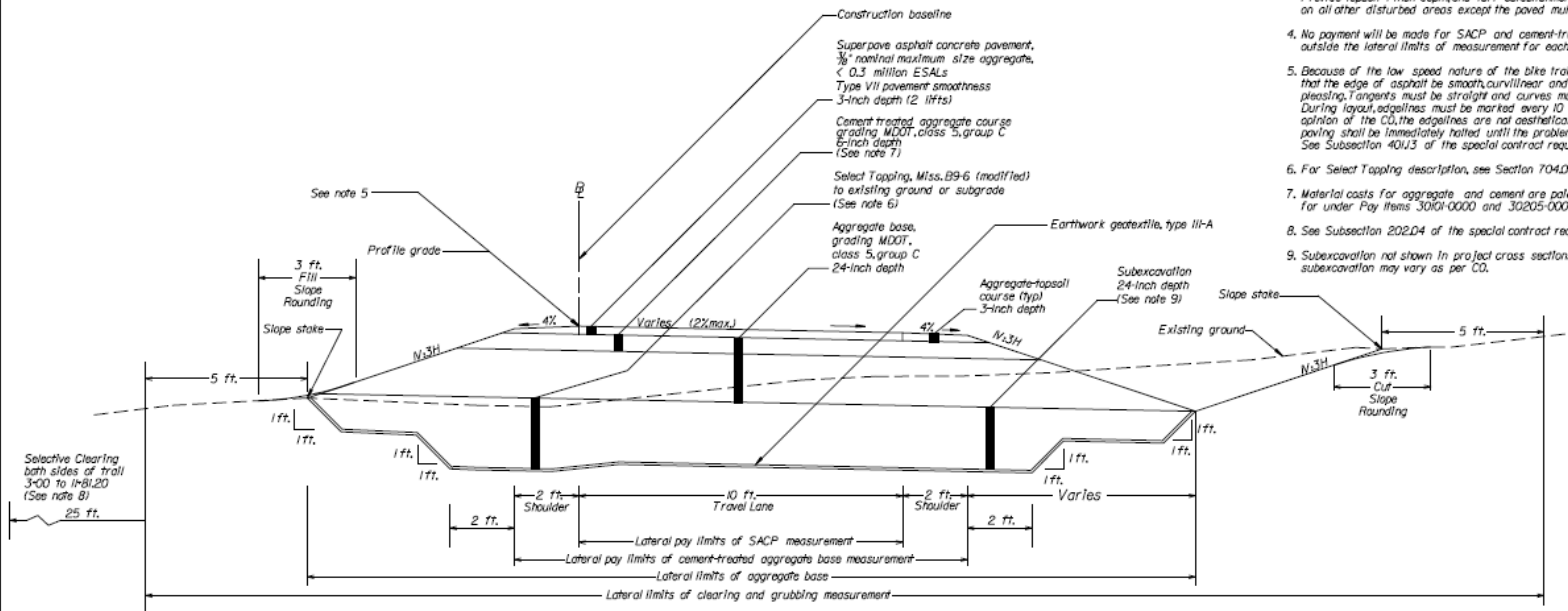
NATCHEZ TRACE PARKWAY

**TYPICAL SECTION
(OPTION 1)
(Livingston road)**

PHIS NO.	NPS NO.	REG	STATE	PROJECT	SHEET NO.
SS808	11-87.42	SE	MS	PRA-NATR 3P17.18	A7

Notes:

1. Cement-treated base shall consist of 4% by weight of ordinary portland cement.
2. Minimum ditch grades are 0.5%. Adjust ditches to provide for proper drainage as directed by the CO.
3. Provide turf establishment on the shoulders. Provide topsoil 4-inch depth and turf establishment on all other disturbed areas except the paved multi-use trail.
4. No payment will be made for SACP and cement-treated base outside the lateral limits of measurement for each item.
5. Because of the low speed nature of the bike trail, it is critical that the edge of asphalt be smooth, curvilinear and aesthetically pleasing. Tangents must be straight and curves must be uniform. During layout, edgelines must be marked every 10 feet. If, in the opinion of the CO, the edgelines are not aesthetically pleasing, paving shall be immediately halted until the problem is corrected. See Subsection 40U.3 of the special contract requirements.
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8. See Subsection 202.04 of the special contract requirements.
9. Subexcavation not shown in project cross sections. Depth of subexcavation may vary as per CO.



MULTI-USE TRAIL
(1-00 to 11-87.42)

0 2 4
SCALE IN FEET

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
EASTERN FEDERAL LANDS HIGHWAY DIVISION
STERLING, VIRGINIA

NATCHEZ TRACE PARKWAY

**TYPICAL SECTION
(OPTION 1)
(livingston road)**

Appendix B: Wetland Statement of Findings

**WETLAND STATEMENT OF FINDINGS FOR
CONSTRUCTION OF CHISHA-FOKA MULTI-USE
TRAIL EXTENSION AT NATCHEZ TRACE
PARKWAY**

January 2024

Recommended:

Superintendent, Natchez Trace Parkway

Concurred:

Chief, Water Resources Division

Approved:

Regional Director, Interior Region 2, South Atlantic-Gulf

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INTRODUCTION

Copperhead Environmental Consulting (Copperhead) has prepared this Statement of Findings for Wetlands (WSOF) in compliance with Executive Order (EO) 1190 *Protection of Wetlands*. NPS would undertake the construction of a 2.5-mile extension to the Chisha Foka Multi-Use Trail within the legislated boundary of Natchez Trace Parkway (Parkway), in Hinds and Madison Counties, Mississippi (Figure 1: Project Location).

The purpose of the proposed project is to improve recreational experiences for non-motorized users. The needs for the proposed trail extension include developing a logical terminus to the trail corridor and improving access at the southern end of the trail. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities. Access to this part of the trail is limited; trail users must currently park several miles to the north of the proposed trail segment. The proposed new trail segment would improve access by connecting to the existing Osburn Stand Information Display parking lot at milepost 93.5.

The NPS has prepared an Environmental Assessment (EA) to compare the proposed project to a “no action” alternative. Wetlands are included among the topics evaluated in the EA, and the extent of potential short-term and long-term adverse effects are evaluated in compliance with EO 1190 requirements. This statement of findings follows a complete wetland delineation and report completed in accordance with Director’s Order (DO) #77-1: *Wetland Protection* and associated materials, which provide guidance on the evaluation of wetlands within NPS lands.

PROPOSED ACTION

The NPS is proposing construction of a 2.5-mile extension to the existing Trail along the Natchez Trace Parkway in Hinds and Madison counties, Mississippi.

The proposed action includes construction and operation of a 2.5-mile long and 10-foot-wide paved Trail parallel to and within the Parkway boundary from approximately milepost 93.5 to milepost 95.9 near Jackson, Mississippi. This 2.5-mile portion of the Trail would follow the alignment identified in the 1995 EA (see Figure 1).

The Trail would be constructed using asphalt pavement. The maximum width of the paved surface would be 10 feet (see typical cross sections in Figures 2, 3, and 4). The Trail is designed to comply with accessibility requirements under the Architectural Barriers Act (1968) and the Americans with Disabilities Act (1990) to provide access for all visitors, regardless of mobility limitations.

Construction Process

The Trail would be constructed using means and methods that reduce impacts to Parkway resources. In total, construction is anticipated to last approximately 540 days.

Land disturbing activities would include several phases, including clearing and grubbing, embankment, grading, and placement of culverts. Prior to initiating surface disturbing activities, crews would install perimeter erosion and sedimentation controls (e.g., silt fence) adjacent to all wetlands and flowing waters. Surface vegetation will be removed and uneven ground surfaces will be leveled within the construction corridor. The total width of the graded subbase would be approximately 18 feet, comprised of aggregate (rock). On top of the subbase there would be a 14-foot-wide base of cement treated aggregate. For the Trail surface, hot mix asphalt would be overlayed on the aggregate to a depth of 3 inches to create the 10-foot-wide Trail. All removed materials will be reused within the construction corridor where applicable.

The width of the construction footprint would vary according to the terrain and Trail feature. For example, a wider footprint would be required to build up the Trail surface where it would cross existing roads or the Canadian National/Illinois Central railroad. Because of this variability, this EA conservatively assumes that there could be surface disturbance associated with Trail construction up to 65 feet (approximately 20 meters) in either direction from the Trail centerline.

Construction vehicles would access the project area from public roads as specified on the design plans, including Livingston Road and Agency Lane. Staging areas within the Parkway property would be limited to existing paved parking areas and previously disturbed areas, such as mowed fields. No new disturbed areas would be established for staging.

Surrounding land is predominantly agricultural and park land adjacent to the Parkway motor road. Portions of the proposed trail consist of hardwood forests and forested wetlands which are described further under "Site Descriptions."

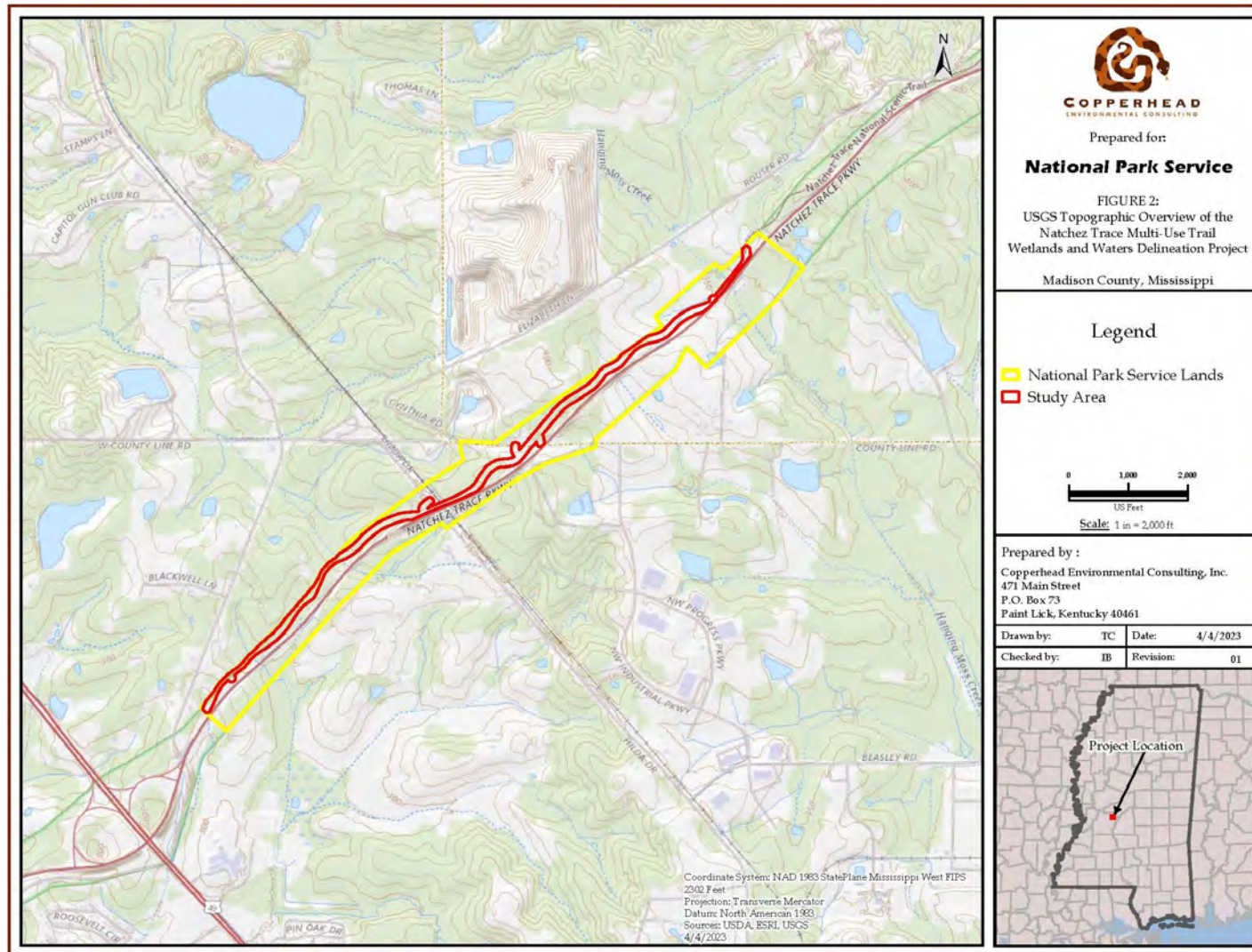
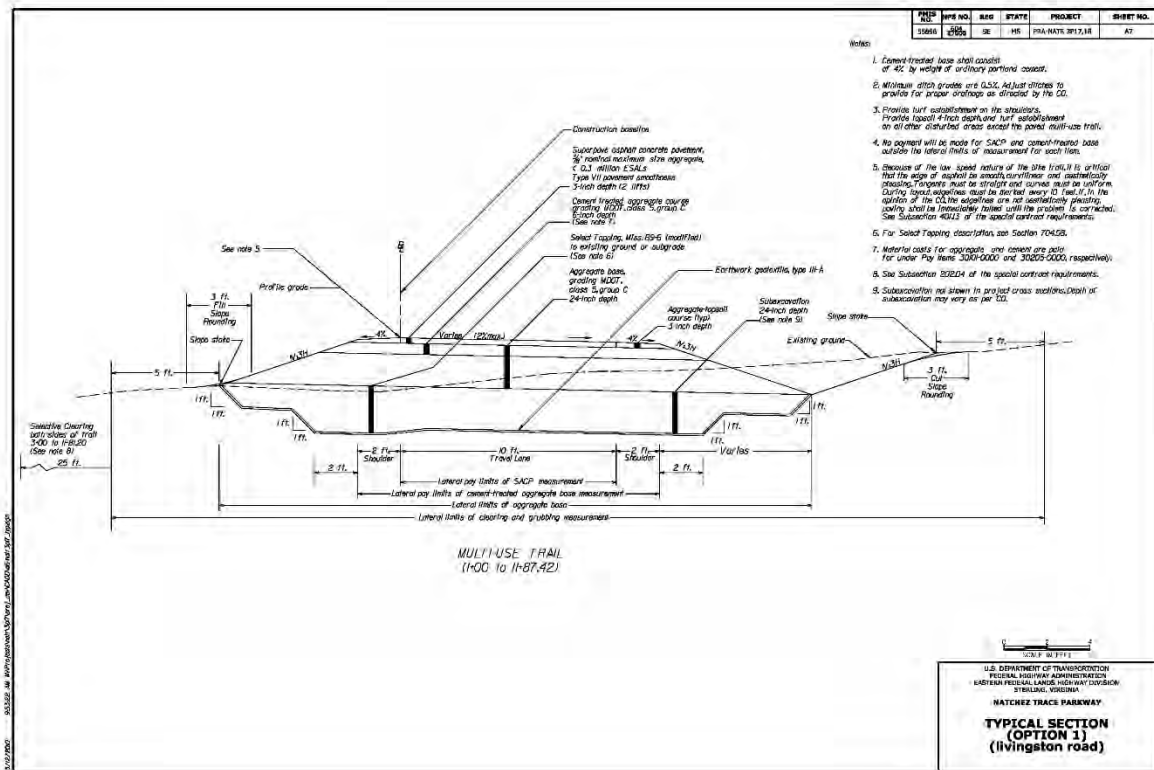
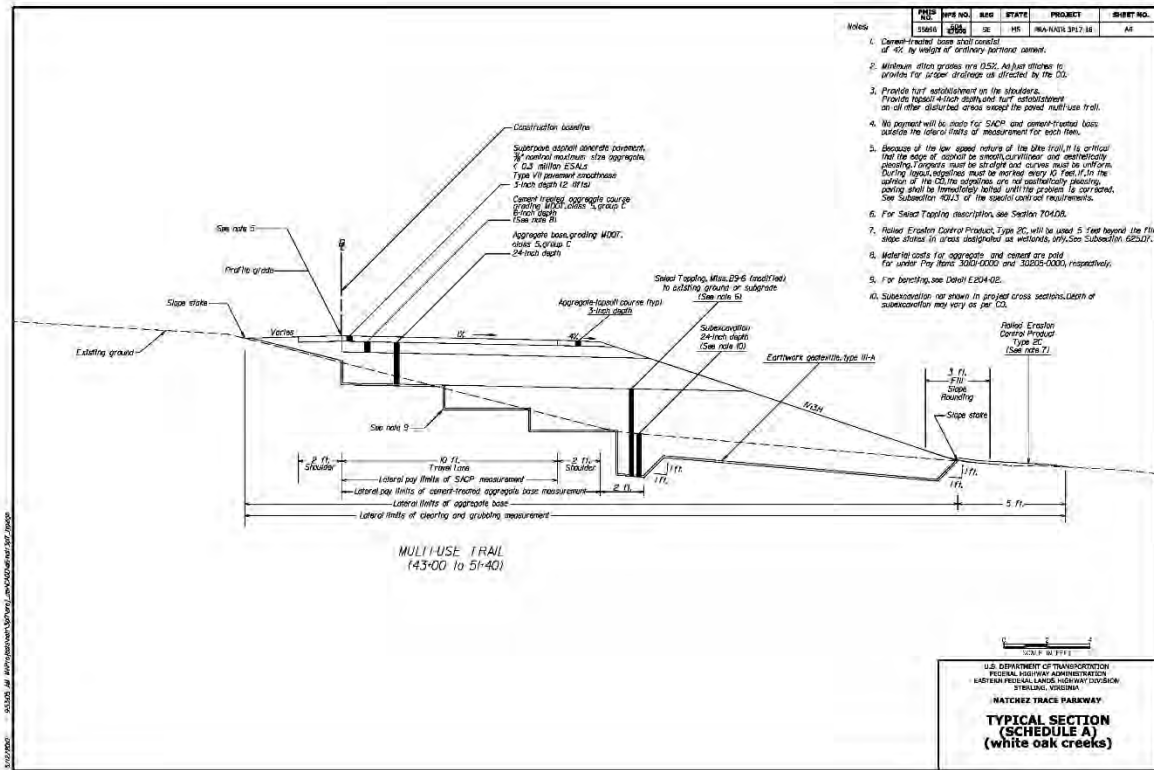
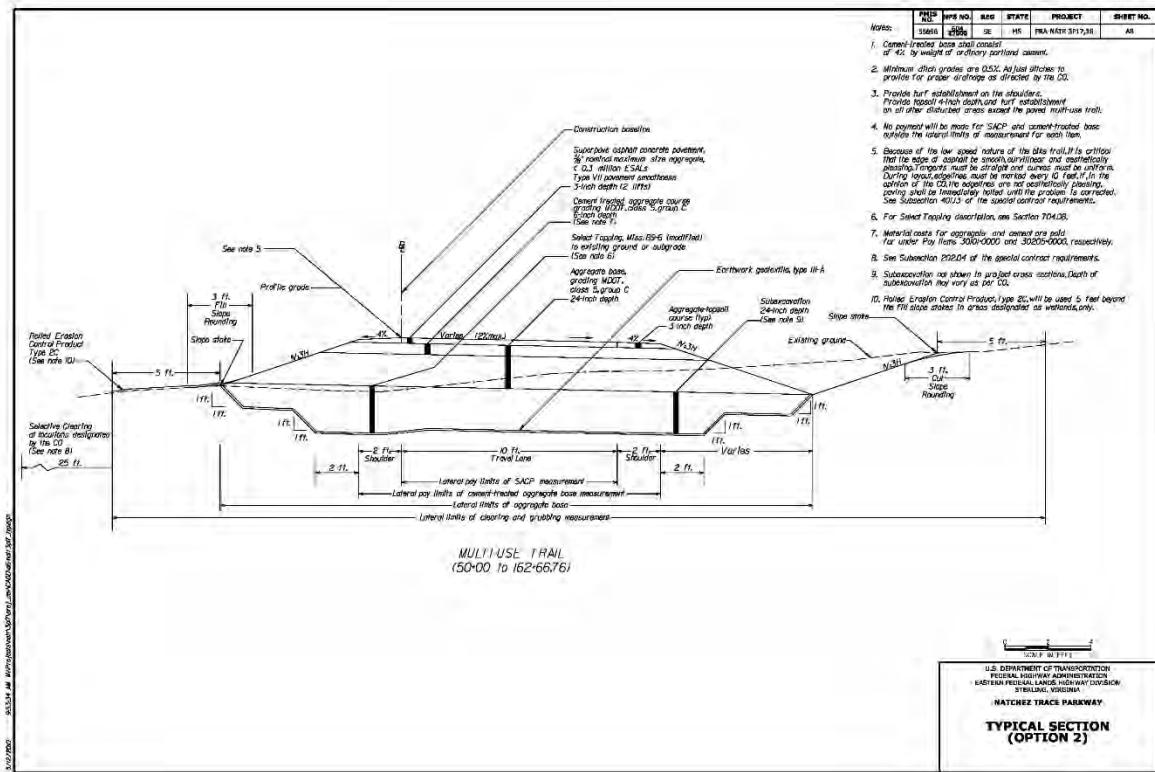


Figure 1: Project Location





Figures 2, 3, and 4: 95% cross-sectional designs of the Proposed Action

INVESTIGATION OF ALTERNATIVES

Several alternatives in addition to the preferred alternative and No Action Alternative were considered but dismissed from further analysis and are summarized below.

No Action Alternative

Under the No-Action Alternative, no action would be taken and the trail extension would not be constructed. The current trail alignment would continue to terminate in a field without amenities or facilities. Non-motorized use of the existing trail would continue.

Natural Surface Trail Extension

Under this alternative, the Trail extension would not be paved and would instead have a natural (e.g., gravel, dirt) surface. Natural surfacing would reduce costs but would limit the type of activities possible. For example, narrow-tire road bicycles, roller blades, and some types of strollers would be difficult and/or unsafe to use on a natural-surface trail. These are all popular activities on the existing Trail; precluding them from use on the extension would not meet the purpose and need for action.

Extension of the Natchez Trace National Scenic Trail

Under this alternative, the Trail extension would be designated as part of the Natchez Trace National Scenic Trail (NST). The NST is currently a 60-mile natural surface hiking trail comprised of five sections along the Parkway. This alternative was dismissed from further consideration because a paved, multi-use Trail extension would be inconsistent with existing sections of the NST.

Connections to Local Greenways

Multiple civic engagement comments requested that the proposed Trail extension include connectivity with existing and planned local greenways. In general, the NPS supports connections with greenways and paths on neighboring public lands. For example, through cooperative agreements with the City of Ridgeland, the existing Trail features connections to greenways in Ridgeland. However, this alternative element was dismissed from further consideration because it would not resolve the purpose and need for action.

Future connections could be considered under a separate environmental review. Cooperative agreements governing these connections would need to account for maintenance of connecting trails, consistency with NPS and municipal planning documents, and the cost of construction. Connections to trails on private land are not authorized because the Parkway is public land and the establishment of exclusive access conflicts with management of a national park unit.

Completing the Entire Chisha-Foka Multi-Use Trail Route

Several civic engagement comments requested full completion of the remaining 6 miles of Trail envisioned in the 1995 EA. This alternative was dismissed from further consideration because it is economically unfeasible and funding is not foreseeable: funding has been secured only for the proposed 2.5-mile extension.

Use of Elevated Boardwalks to Minimize Wetland Impacts

During the project design phase, the use of elevated wooden boardwalks was considered as a method to reduce impacts on wetlands. This alternative was not carried forward because it would not be consistent with the existing Trail construction methods and surfacing, would not be durable over the long term given the frequent use (including motorized administrative use for maintenance) the Trail receives, and would not facilitate emergency vehicle access (e.g., ambulances).

SITE DESCRIPTION - WETLANDS

Wetlands were observed, flagged, and mapped in accordance with guidance from the 1987 United States Army Corps of Engineers (USACE) *Wetland Delineation Manual* (USACE 1987) and DO #77-1 to ensure adherence to guidelines enforced by both regulatory authorities. The study area was created by buffering the centerline, as well as entrance and exit points for the proposed project by 20m (approximately 65.6 feet) on each side (40m, approximately 131.2 feet total width). Locations where the buffer overlapped the existing Natchez trace trail or extended outside of NPS land were removed from the study area resulting in a 33.5-acre study area. On March 29, 2023 Copperhead wetland scientists Isaac Bentley and Jake Murphy performed a site visit and field delineation.

The field survey resulted in the identification of 14 palustrine wetlands and 5 riverine wetlands totaling 3.44 acres within the study area (Appendix A).

Wetlands were described using the Cowardin classification system (Cowardin *et al.* 1979). National Wetlands Inventory (NWI) and National Hydrography Dataset (NHD) mapped wetlands were referenced prior to field delineation and are shown in Figure 5. No NWI wetlands, three NHD waterways, and two NHD waterbodies were previously mapped within the study area. Of the 19 wetlands identified, 5 were classified as palustrine emergent (PEM), 2 were classified as palustrine scrub shrub/palustrine emergent complexes (PSS/PEM), 7 were classified as palustrine forested (PFO), 1 was classified as lower perennial riverine (R2), and 4 were classified as intermittent riverine (R4).

The study area consists of rolling hills with waterways surrounded by palustrine wetlands at lower elevations. Habitats were classified using the NPS Vegetation Mapping Inventory Program's Vegetation Map of Natchez Trace Parkway (NPS 2016). The northeastern portion of the study area is primarily cultural agriculture, and ruderal herbaceous land, with highly disturbed vegetation that has been subjected to regular mowing or grazing. Portions of this area show signs of drainage via man-made ditches, but several areas hold water at lower elevations. Wetlands classified as PEM or PEM/PSS are characterized by disturbed vegetation and sandy/loamy soils. These wetlands frequently border man-made ditches and riverine features. Dominant vegetation species consist of tall fescue (*Schedonorus arundinaceous*), meadow buttercup (*Ranunculus acris*), Cherokee sedge (*Carex cherokeensis*), soft rush (*Juncus effusus*), and path rush (*Juncus tenuis*).

The remainder of the study area consists of southern hardwood forest, ruderal conifer (hardwood) forest, and ruderal hardwood forests interspersed by occasional ruderal shrublands and ruderal herbaceous areas where cultural developments such as road crossings, a railroad, and the maintained shoulder for the Natchez Trace Parkway intersect the study area. Vegetation within ruderal herbaceous and shrublands mirrors the conditions described for the northeastern section, with the addition of common woody and sub-woody shrubs such as Chinese privet

(*Ligustrum sinense*) and Pennsylvania blackberry (*Rubus pensylvanicus*) appearing within shrublands. Herbaceous vegetation within forested wetlands in the study area is sparse and consists primarily of shade-tolerant grasses and herbs including meadow garlic (*Allium canadense*) and sedges (*Carex sp.*). Dominant species in the canopy and understory consist of loblolly pine (*Pinus taeda*), slippery elm (*Ulmus rubra*), and Chinese privet (*Ligustrum sinense*). Multiple PFO wetlands and one PEM/PSS wetland were delineated in or adjacent to the forested portion of the study area. Most of the wetlands feed off-site drainage features or intermittent streams on-site.

The field survey resulted in the identification and delineation of 5 riverine wetlands based on field observation at the time of the survey. One perennial riverine wetland/named water body, SAB (an unnamed tributary [UNT] to Hanging Moss Creek), was identified within the proposed project area. The remaining four riverine wetlands have an intermittent flow regime. All of these wetlands have been degraded severely by surrounding land uses, and only 2 of the 5 possess a riparian buffer zone of woody or herbaceous hydrophytic vegetation.

PROPOSED IMPACTS TO WETLAND FUNCTIONS AND VALUES

This chapter describes current environmental conditions in the project area and the environmental consequences of implementing each alternative. The issues analyzed here correspond to the impact topics described in Chapter 1 of this EA. Unless otherwise noted, the geographic scope of analysis is a 33.2-acre project area that includes a 40-meter-wide buffer around the proposed Trail centerline. In some places, the project area is less than 40 meters in width because it does not extend across the Parkway itself or onto adjacent private lands. Short-term impacts are those occurring during the anticipated 540-day construction period while long-term impacts are associated with Trail operation and maintenance.

In accordance with the Council on Environmental Quality regulations, impacts of the alternatives are described under each impact topic (40 CFR 1502.16). Where appropriate, mitigating measures for adverse impacts are described and their effect on the severity of the impact is noted. The methods used to assess impacts vary depending on the resource but are generally based on a review of pertinent literature and park studies, information provided by on-site experts and other agencies, professional judgment, and park staff knowledge and insight.

Under the preferred alternative total land disturbance would be up to approximately 33.5 acres. Construction of the new trail would adversely impact up to approximately 3.4 acres of palustrine wetlands and 0.05 acres of riverine wetlands within the project area. These impacts include both 0.539 acres of temporary impacts within the construction limit of disturbance and 2.901 acres of permanent impacts from fill and paving. Mitigation measures and best management practices would be implemented during construction to reduce the temporary and permanent adverse impacts on wetlands.

Table 1: Proposed Mitigation Measures and Best Management Practices for the Chisha Foka Multi-Use Trail Extension.

Project Phase	Mitigation Measures and Best Management Practices (BMP)
General (applies to all phases of the project)	<ul style="list-style-type: none"> • All equipment and vehicle washing operations would occur off-site. • To protect night sky resources, preserve the existing viewshed, and because the Trail would be open only during daylight hours, no lighting would be installed. • Parking personal vehicles would be within designated areas only. • The project shall include a pre-construction meeting and a final inspection meeting, in addition to the construction contractor's environmental monitoring and regularly scheduled project meetings and site visits. • To minimize the amount of ground disturbance, staging and stockpiling areas shall be in previously disturbed sites, away from visitor use areas to the greatest extent possible • Visitors would be notified of temporary closures, delays, and road hazards during construction to convey appropriate messages and mitigate potential impacts of visitor expectation and experience. • A project schedule would be provided to the public as soon as it is known.
Pre-Construction	<ul style="list-style-type: none"> • United States Army Corps of Engineers (USACE) may issue a 401/404 permit for project actions. A pre-construction notification submitted to the USACE district engineer may be required prior to commencing construction. • Measures would be employed to prevent or control spills of fuels, lubricants, or other contaminants from entering the waterway or wetlands • The park's Public Information Officer shall be notified at least two weeks in advance of scheduled work and/or when the start date has been established by contract, so that a news release may be sent to the public. • All utilities would be properly marked prior to construction activities by local utility companies. If any utility shutdowns

Project Phase	Mitigation Measures and Best Management Practices (BMP)
	<p>are expected, the contractor would notify park management and district staff.</p> <ul style="list-style-type: none"> • The project administrator shall inspect all off-road equipment prior to entering NPS lands to ensure that they are free of soil, seeds, vegetative material, or other debris that could contain or hold noxious weed seeds. "Off-road equipment" includes all construction machinery, except for trucks, service vehicles, water trucks, pickup trucks, cars, and similar vehicles. • To minimize impacts on listed bats, migratory birds, and rare plants, tree clearing would be limited to November 15 - March 31. • Construction crews would install and maintain BMPs such as the use of wooden construction pallets or timber matting and installation of perimeter erosion and sedimentation controls (e.g., silt fence) adjacent to all wetlands and flowing waters.
During Construction	<ul style="list-style-type: none"> • An environmental monitor would perform regularly scheduled monitoring to ensure any undocumented threatened, endangered, proposed, or candidate species; or nesting species; or milkweed plants are noted and avoided within the project area prior to and during construction. • Erosion control measures such as silt fencing, temporary diversion channels, and check dams would be used to minimize potential soil erosion. They would be removed upon project completion when appropriate. • Wetland mitigation would involve tree planting and seeding of native hydrophytic plants. • During construction, wetlands would be avoided using bridge crossings or retaining walls wherever possible. Increased caution would be exercised to protect these resources from damage caused by construction equipment, erosion, siltation, and other activities with the potential to affect wetlands. Measures would be taken to keep construction materials from escaping work areas, especially near streams or natural drainages. • Runoff from stockpiled materials must be controlled with silt fencing, filter cloth, coir wattles, or other appropriate means to prevent reentry into waterways or wetlands.

Project Phase	Mitigation Measures and Best Management Practices (BMP)
	<ul style="list-style-type: none"> • Wooden construction pallets would be required to protect wetlands from vehicle impacts. • Sediment filter bags would be used for dewatering operations. Unfiltered discharge must not flow directly into wetlands. • Contractor would be required to maintain silt fence lines once they have been installed and/or repaired. • Construction activities would be halted while the ground is saturated following large rain events to avoid damage to soils and vegetation. • Care would be taken to avoid any rutting caused by vehicles or equipment during construction activities. • Heavy equipment use in wetlands would be avoided if possible. Heavy equipment used in wetlands would be placed on mats, or other measures must be taken to minimize soil and plant root disturbance and to preserve preconstruction elevations. • Should construction unearth previously undiscovered archeological resources, work would be stopped in the area of any discovery and the Parkway would consult with the state historic preservation officer/tribal historic preservation officer and the Advisory Council on Historic Preservation, as necessary, according to 36 CFR 800.13, Post Review Discoveries. In the unlikely event that human remains are discovered during construction and if the remains appear to be Native American in origin, the Forest Service will treat any such remains or objects in accordance with provisions outlined in the Native American Graves Protection and Repatriation Act (1990). In the event that any human remains or associated funerary objects cannot be associated with Native Americans, the Forest Service will need to coordinate with local law enforcement/coroner as appropriate (ACHP 2023). • Stumps in the Trail extension corridor would be cut as low as possible to the ground to avoid safety hazards. • All construction activities would be confined to daylight hours, excluding emergencies. • Construction materials staging areas would be restricted to previously disturbed sites in upland areas.

Project Phase	Mitigation Measures and Best Management Practices (BMP)
	<ul style="list-style-type: none"> • Equipment must be free of any fluid leaks (fuel, oil, hydraulic fluid, etc..) upon arrival to the work site and would be inspected at the beginning of each shift for leaks. Leaking equipment would be removed off site for necessary repairs before the commencement of work. • All hazardous waste materials such as oil filters, petroleum products, and equipment maintenance fluids would be stored in structurally sound and sealed containers in the hazardous materials storage area and segregated from the other non-waste materials. Additionally, all hazardous materials would be disposed of in accordance with federal, tribal, and state regulations. • Any waste generated would be properly disposed of in a contract-provided trash bin located at an approved site and hauled off promptly at project completion. • Construction equipment and maintenance materials would be stored at approved staging areas. • All major equipment and vehicle fueling, and maintenance would be performed offsite or on non-pervious surfaces such as concrete or asphalt or deploy a spill containment pad. Absorbent, spill cleanup materials and spill kits would be located at the staging area. All equipment receiving maintenance and vehicles and equipment parked overnight would have drip pans placed beneath them. • No work would occur outside of the limits of disturbance without NPS approval.
Post Construction	<ul style="list-style-type: none"> • Ground surface treatment would include grading to natural contours, topsoil and topsoil mantle replacement, seeding, and planting. Pathway edges would be promptly revegetated with NPS approved seed mixes upon completion of pathway construction. All mulch used in re-vegetation efforts shall be certified to be free of weed species. This work would occur as soon after the completion of construction as possible. Soil and fill material must be weed-free and from a source approved by the National Park Service. • Vegetation adjacent to the Trail would be managed to ensure that woody vegetation does not become established. Woody vegetation has contributed to the poor condition of the

Project Phase	Mitigation Measures and Best Management Practices (BMP)
	<p>existing Trail, interfering with drainage and deforming the Trail surface. Vegetation management could include mechanical or chemical means (e.g., mowing, herbicide, brush removal), in accordance with NPS policies.</p> <ul style="list-style-type: none"> • Disturbed areas would be reseeded with a native seed mix. To facilitate successful reseeding, seed mixes would consider sun exposure, soil types, and other characteristics. • Downed woody debris resulting from construction activities should not be left in place in a pile due to concerns about fuel loading and potential for wildfire impacts. Woody debris should be cut up and scattered or mulched and applied on site. • Invasive vegetation shall not be mulched and spread when it is in seed. • Remove all flagging and fencing and soil erosion structures (after vegetation is established). • All staging and stockpiling areas would be returned to pre-construction conditions following construction. • All pathway segments would have appropriate signage to inform users of permitted activities and prevent user conflicts. • Annual pathway maintenance would include monitoring and maintenance of drainage features, as necessary. Monitoring of these features shall also occur during construction to ensure that impacts are minimized, and drainage management is implemented. • Restoration of wetland areas and monitoring requirements would be defined by the mitigation plan documented in the Wetland Statement of Findings.

Upon completion of the screening process, the following resources were identified for detailed consideration in this WSOF: biotic functions, hydrologic functions, cultural values, research and scientific values, and economic values through recreation/visitor experience. Wetlands functions for features within the study area are evaluated and described below.

BIOTIC FUNCTIONS

The biotic functions of wetlands are related to the ability of the wetland to support a variety of life. Examples of this include the presence of fish and wildlife habitat, floral and faunal productivity, native species and habitat diversity, and the presence of threatened and endangered

species. Despite efforts to minimize impacts to wetlands through siting and BMPs, some impacts within the study area would be unavoidable under the proposed action. Approximately 0.539 acres of permanent filling of wetlands would occur under the proposed action, additionally 2.901 acres of temporary impacts such as tree clearing, and disturbance of other wetland vegetation would result in alteration of biotic functions of wetlands on site.

The preferred alternative would result only in minor alterations to biotic functions of wetlands within the study area. Tree clearing would be minimized and timed appropriately to avoid interference with rare, threatened and endangered (RTE) species, appropriately sized bridges and culverts would be constructed where appropriate to retain hydrologic and biological connectivity to downstream waters.

Federally listed and proposed bat species including northern long-eared bats (*Myotis septentrionalis*) and tricolored bat (*Perimyotis subflavus*) may use the forested habitat within the study area. At the time of writing, the tricolored bats are proposed endangered by USFWS, and may be listed by the time of construction activities. Alligator snapping turtles (*Macrochelys temminckii*) and ringed sawback turtles (*Graptemys oculifera*) are known to occur in the vicinity of the study area. No suitable habitat for alligator snapping turtle was located within the study area during field surveys, and appropriate bridge/culvert sizing would minimize effects on the species by the proposed action. Ultimately no adverse effects to protected or special status species are expected to occur as a result of implementing the proposed action. The USFWS provided concurrence with effects determinations that the proposed action is unlikely to adversely affect northern long-eared bat and alligator snapping turtle, and that project activities would have no effect on the ringed sawback turtle.

HYDROLOGIC FUNCTIONS

The hydrologic functions of wetlands help to improve overall water quality and reduce damage that may be caused by flooding. Hydrologic functions include flood attenuation, streamflow maintenance, ground water discharge/recharge, erosion/sedimentation control, water purification, toxin/nutrient retention, and nutrient transformation. No significant changes to wetland hydrology are proposed. Grading and installation of impermeable asphalt may result in some short and long-term effects on drainage patterns. However, the anthropogenically modified nature of much of the study area (presence of mowed/cleared land and drainage ditches) would be unlikely to suffer adverse effects from minor alterations in sheet flow resulting from the proposed action. The installation and maintenance of BMPs would minimize the likelihood of erosion and sedimentation of existing palustrine and riverine features and minimize the short and long-term effects on their hydrologic functions.

CULTURAL VALUES

The cultural value of wetlands is derived from the qualitative value presented by these ecosystems to communities. Cultural values include visual quality, education, historic/archaeological values, and recreational values. Agency consultation was initiated with the Mississippi Department of Archives and History (MDAH; Mississippi's State Historic Preservation Office) to comply with Section 106 of the NHPA. A February 3, 2023, letter was mailed requesting MDAH concurrence that there would be no adverse effect from implementation of the proposed project. In a letter dated March 2, 2023, MDAH concurred with the no adverse effect determination (Appendix C of the Environmental Assessment).

Separately, the NPS additionally prepared an assessment of effect to comply with the requirements of Section 106 of the NHPA as amended (54 USC 306108), and its implementing regulations (36 CFR 800). In summary, the report found archeological and cultural resources present, however, no adverse effects were identified.

During the planning process for this EA, the Parkway contacted the following Tribes to initiate consultation (see Appendix C of the Environmental Assessment):

- Alabama-Coushatta Tribe of Texas
- Alabama-Quassarte Tribal Town
- Chickasaw Nation
- Chitimacha Tribe of Louisiana
- Jena Band of Choctaw Indians
- Kialegee Tribal Town
- Mississippi Band of Choctaw Indians
- Muscogee (Creek) Nation
- Poarch Band of Creek Indians
- Thlopthlocco Tribal Town
- Tunica-Biloxi Tribe

Two responses were received: the Chickasaw Nation had no objections to the Project and the Muscogee (Creek) Nation requested a copy of the archaeological survey report for review. The NPS also informed the Tribes of the availability of the EA for review.

RESEARCH/SCIENTIFIC VALUES

Undisturbed wetlands or wetlands with unique characteristics can play an important role in furthering our understanding of wetland systems. These wetlands may be used as reference sites for insight into unimpacted wetland systems, provide educational value, or have unique biotic or hydrologic functions that make them noteworthy. There are currently no known scientific and research projects occurring within or adjacent to the study area, and wetlands within the study

area are unlikely to be considered reference sites due to the abundance of existing anthropogenic disturbance and non-native vegetation within each feature. Additionally, the permanent loss or alteration of wetlands within the study area would be minimal. The proposed project is therefore unlikely to adversely affect research and scientific values for wetlands within the study area.

ECONOMIC VALUES AND RECREATION/VISITOR EXPERIENCE

Wetlands can provide economic value to communities. The hydrologic functions of wetlands can prevent significant economic damage as a result of flooding, offer fisheries habitat, and present tourism opportunities.

The existing trail is a valued recreational asset for local community members and visitors alike. Popular activities include walking, running, bicycling, and bird watching. During the 30-day civic engagement comment period that preceded development of the EA, a total of 123 public comments were received, the vast majority of which were supportive of the multi-use trail extension for reasons of visitor use and experience. The 30-day comment period occurred from June 1 – 30, 2023, and a total of 123 submissions were received. Key topics identified in the submissions included visitor use and enjoyment, connectivity with local communities, and multi-use trail maintenance.

Over the short and long terms, implementation of the proposed action would benefit visitor use and experience by providing additional multi-use trail segments for recreation. Continued use of the trail would contribute to local economies by increasing avenues for local tourism and supporting jobs for agency employees and local businesses. As user experience and recreational values are enhanced by the addition of the proposed action, economic values would subsequently benefit from continued and increased use of the area.

ITERATIVE PROCESS FOR WETLAND PROTECTIONS

Avoidance

Given the prevalence and location of wetlands within the study area, the goal of increasing connectivity between existing segments of the multi-use trail, and the confinement of potential designs between the existing Natchez Trace Parkway and private lands, some filling of wetlands would be required for the completion of the Preferred Alternative. Due to reasons described under the investigation of alternatives, the No Action Alternative, which would not result in wetland impacts, is not consistent with short and long-term goals of increased accessibility and safety for pedestrians and cyclists within the Natchez Trace Parkway. Efforts to minimize and provide protective measures to limit adverse effects on wetlands would be adopted consistent with DO #77-1 and EO 11990.

Minimization

To minimize ground disturbance and adverse effects to wetlands, construction would use means and methods to reduce impacts to Parkway resources. All removed materials would be reused within the construction corridor where applicable. Additionally, at several locations throughout the proposed project area, the trail runs immediately adjacent to the Natchez Trace Parkway, thereby limiting potential adverse effects to wetlands at those locations. Staging areas during construction would be confined entirely to paved surfaces and previously disturbed upland portions of the proposed study area to limit the acreage impacted by construction. Ultimately, impacts to wetlands under the preferred alternative would be minimized to the maximum practicable extent.

Protection Measures

Prior to initiating surface disturbing activities, crews would install and maintain Best Management Practices (BMPs) such as the use of wooden construction pallets or timber matting and installation of perimeter erosion and sedimentation controls (e.g., silt fence) adjacent to all wetlands and flowing waters (Table 1).

COMPENSATORY MITIGATION PLAN

Five (5) riverine wetlands totaling 0.05 acres and 14 palustrine wetlands totaling 3.39 acres (3.44 acres combined) would be impacted by construction of the preferred alternative. Figures displaying the location of each wetland are provided in Appendix A.

The amount of wetland permanently and temporarily impacted during proposed construction would be 3.44 acres. Wetland function within proposed impact areas is low, with palustrine emergent wetlands bordering agricultural lands and frequently maintained roadsides amassing 1.31 acres (39%) of impacted features. Riverine wetlands totaling 0.05 acres were located within similar environments and showed signs of siltation and erosion that are typical in anthropogenically-altered landscapes. The remaining 2.08 acres (61%) consist of palustrine scrub-shrub and palustrine forested wetlands with young (less than 50 years old) woody stems, an abundance of non-native vegetation, and consequently low ecological value. Compensating for impacts to low quality wetland by removing agricultural practices, grading to restore hydrology, and replanting with native vegetation requires a ratio of at least 4:1 (4 acres of enhancement for every acre of impact). The proposed restoration of 14 acres would satisfy the NPS policy requiring no-net loss of wetlands within NPS lands.

Within the Natchez Trace Parkway property, NPS staff identified two areas suitable for wetland restoration based on field observations and aerial imagery. The areas are located near Saltillo, MS near milepost 271 along the parkway. The larger area totals 9.30 acres and the smaller area totals 4.86 acres for a total of 14.17 acres of land available for wetland restoration. Agricultural practices such as haying and tilling within the proposed mitigation areas have disturbed the vegetation,

soils and hydrology of the two areas and reduced the functions and values of the wetlands that previously lay within each area. Specifically, the two parcels proposed for restoration have been altered hydrologically due to furrows created by agriculture machinery. Water pools in those furrows and there is no natural flow. The land currently does not support hydrophytes due to the haying and tilling.

Because the areas are no longer functioning as wetlands, ending the agricultural activities within these areas and re-introducing native vegetation communities will allow for natural hydrologic conditions to return, and promote the formation of hydric soils within the two areas. Ultimately the restoration will reintroduce wetland functions where they have been degraded or eliminated by current land-use practices.

The potential benefits of restoring the two areas are reinforced by the persistence of riparian forests adjacent to the potential restoration areas. The two areas lie within the watershed of Brock Creek, and initial observations indicate that the two areas share hydrologic connectivity beneath MS Rt 363. Restoration of these two areas would benefit the downstream waters including Brock Creek through filtration and storage of runoff from adjacent development. The restoration will also result in the creation of wildlife habitat, improvement to nutrient cycling, and increased groundwater recharge. A large-scale map that clearly identifies the location and boundaries of potential compensation sites have been provided in Figure 5: Mitigation Area.

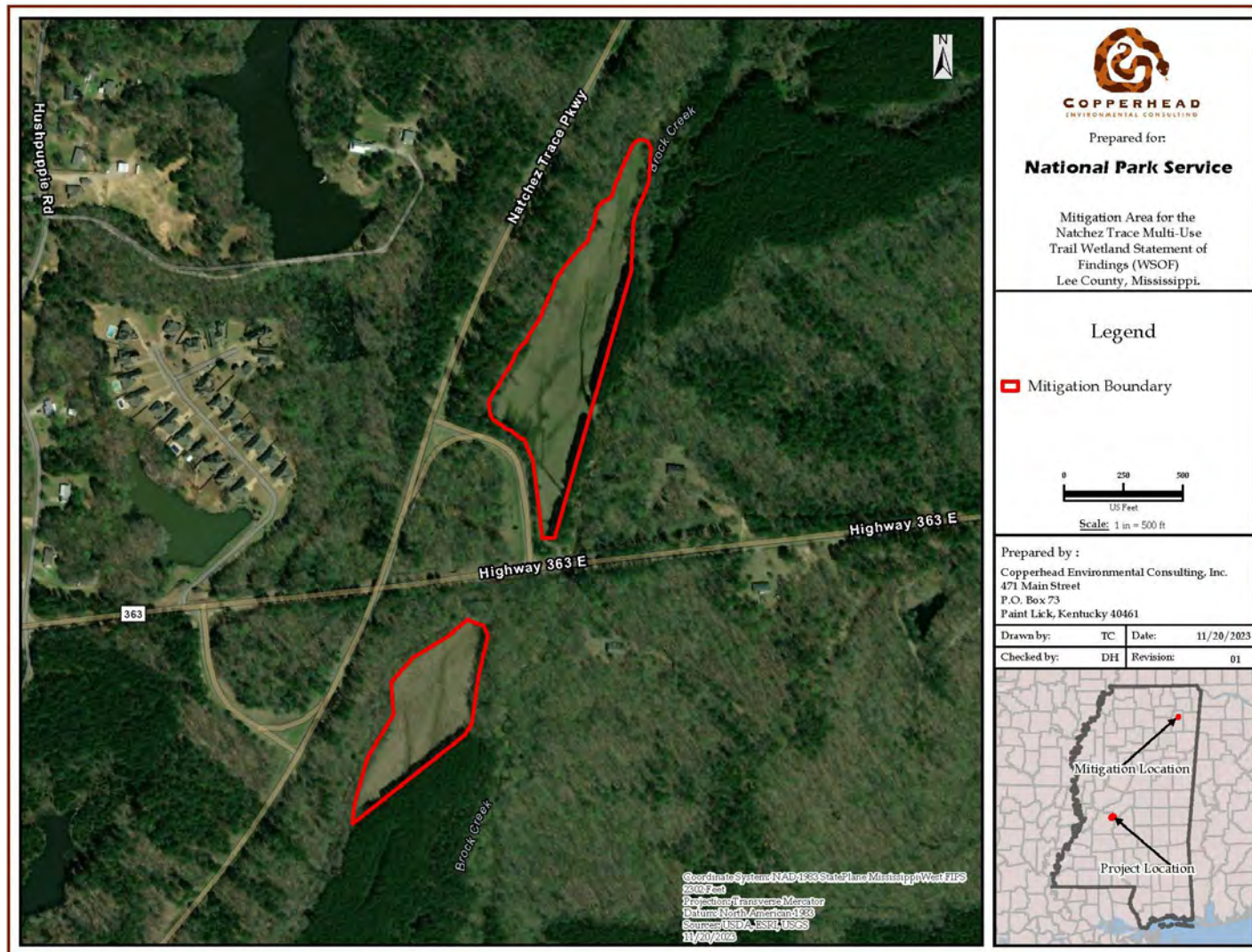


Figure 5. Mitigation Area

While restoration of only 3.44 acres would be sufficient to fulfill the NPS policy for no net loss of wetlands on Park Service lands, restoration of the entire 14.17 acres could result in improved wetland functions, buffering for adjacent streams via creation of riparian zones, and ultimately produce an 8.68-acre surplus of restored wetland within Natchez Trace Parkway land. An additional mitigation area was initially identified during the delineation of wetlands and waterbodies in the spring of 2023. This area was dismissed from further consideration due to concerns regarding changes to the Parkway's viewshed resulting from tree planting, and other factors decreasing the feasibility of restoring the area.

Restoration of the suitable 14.17-acres (mitigation area) would be completed in three stages: site preparation, planting, and monitoring. Site preparation would include shallow tilling/discing (at a depth not to exceed 6 inches) to remove the furrows near wetlands and drainages and to prepare for planting. This would allow for a more natural water flow that matches the surrounding area. Once shallow tilling has been completed, NPS would conduct a pedestrian survey to identify any archeological resources brought to the surface. The last step in site preparation would be seeding of native seed and/or groundcover species for soil stabilization.

Tree planting would be conducted during either the spring or fall months to maximize the likelihood of meeting survival criteria for tree planting. A planting palette of recommended species based on documentation of surrounding wetlands is provided in Figure 6 to assist in replacement of hydrophytic plant communities that would be expected to occur in natural wetlands in the region based on vegetation data collected during on-site surveys. The re-seeding of treated areas could be performed repeatedly during the growing season for two consecutive years following tree planting, and then on an as-needed basis guided by collected monitoring data. If restoration of the compensatory wetland areas follows guidelines listed above then the anticipated timeframe for fully functioning compensatory wetlands is approximately five years.

Monitoring would be performed in each of those 5 years to track the survival of planted trees and native herbaceous plant communities.

Recommended Planting Palette for Natchez Trace MUT Wetland Mitigation				
Type	Scientific Name	Common Name	Light Requirement	Moisture Requirement
Flowering Herb	<i>Asclepias incarnata</i> var. <i>pulchra</i>	Swamp Milkweed	Sun,Part	Water,Wet,Moist
Flowering Herb	<i>Chamaecrista fasciculata</i> var. <i>fasciculata</i>	Common Partridge-pea	Sun,Part	Moist,Dry
Flowering Herb	<i>Clematis virginiana</i>	Virgin's-bower	Sun,Part,Shade	Moist,Dry
Flowering Herb	<i>Conoclinium coelestinum</i>	Mistflower, Ageratum	Sun,Part	Wet,Moist,Dry
Flowering Herb	<i>Coreopsis tripteris</i>	Tall Coreopsis	Sun,Part,Shade	Moist,Dry
Flowering Herb	<i>Eupatorium perfoliatum</i>	Boneset, Common Boneset	Sun,Part	Wet,Moist
Flowering Herb	<i>Eutrochium fistulosum</i>	Hollow Joe-pye-weed	Sun,Part,Shade	Wet,Moist
Flowering Herb	<i>Helianthus autumnale</i>	Common Sneezeweed	Sun,Part,Shade	Wet,Moist,Dry
Flowering Herb	<i>Hibiscus moscheutos</i>	Swamp Rose-mallow	Sun,Part	Wet,Moist,Dry
Flowering Herb	<i>Lobelia cardinalis</i>	Cardinal Flower	Sun,Part,Shade	Wet,Moist
Flowering Herb	<i>Lobelia siphilitica</i>	Great Blue Lobelia	Sun,Part,Shade	Wet,Moist,Dry
Flowering Herb	<i>Mimulus alatus</i>	Winged Monkeyflower	Sun,Part,Shade	Wet,Moist
Flowering Herb	<i>Phlox divaricata</i>	Wild Blue Phlox	Part,Shade	Moist,Dry
Flowering Herb	<i>Rhexia virginica</i>	Virginia Meadow Beauty	Sun,Part	Wet,Moist,Dry
Flowering Herb	<i>Saururus cernuus</i>	Lizard's-tail, Water-dragon	Sun,Part,Shade	Wet,Moist
Flowering Herb	<i>Solidago rugosa</i>	Rough-stemmed Goldenrod	Sun,Part,Shade	Wet,Moist,Dry
Flowering Herb	<i>Symphotrichum novae-angliae</i>	New England Aster	Sun,Part	Water,Wet,Moist,Dry
Flowering Herb	<i>Verbena hastata</i>	Blue Vervain, Common Vervain	Sun,Part	Wet,Moist,Dry
Flowering Herb	<i>Veronica gigantea</i>	Tall Ironweed	Sun,Part,Shade	Water,Wet,Moist
Grass/sedge/rush	<i>Agrostis perennans</i>	Autumn Bentgrass	Sun,Part,Shade	Wet,Moist,Dry
Grass/sedge/rush	<i>Andropogon gerardii</i>	Big Blueslem, Turkeyfoot	Sun,Part	Moist,Dry
Grass/sedge/rush	<i>Andropogon glomeratus</i>	Bushy Bluestem	Sun,Part	Wet,Moist
Grass/sedge/rush	<i>Arundinaria tecta</i>	Switch Cane	Sun,Part,Shade	Wet,Moist
Grass/sedge/rush	<i>Carex crinita</i> var. <i>crinita</i>	Long-fringed Sedge	Sun,Part,Shade	Wet,Moist
Grass/sedge/rush	<i>Carex lurida</i>	Sallow Sedge	Sun,Part,Shade	Wet,Moist
Grass/sedge/rush	<i>Chasmanthium latifolium</i>	River Oats	Sun,Part,Shade	Wet,Moist
Grass/sedge/rush	<i>Dichanthelium clandestinum</i>	Deer-Tongue Grass	Sun,Part,Shade	Wet,Moist,Dry
Grass/sedge/rush	<i>Elymus hystrix</i> var. <i>hystrix</i>	Bottlebrush Grass	Sun,Part,Shade	Moist,Dry
Grass/sedge/rush	<i>Elymus virginicus</i>	Virginia Wild Rye	Sun,Part,Shade	Wet,Moist,Dry
Grass/sedge/rush	<i>Juncus canadensis</i>	Canadian Rush	Sun,Part	Water,Wet,Moist
Grass/sedge/rush	<i>Juncus effusus</i> ssp. <i>Solutus</i>	Common Rush, Soft Rush	Sun,Part,Shade	Water,Wet,Moist
Grass/sedge/rush	<i>Leersia oryzoides</i>	Rice Cutgrass	Sun,Part,Shade	Water,Wet,Moist
Grass/sedge/rush	<i>Panicum virgatum</i> var. <i>virgatum</i>	Switchgrass	Sun,Part,Shade	Wet,Moist,Dry
Grass/sedge/rush	<i>Scirpus cyperinus</i>	Woolgrass	Sun,Part	Water,Wet
Tree	<i>Acer rubrum</i>	Red Maple	Sun,Part,Shade	Wet,Moist,Dry
Tree	<i>Betula nigra</i>	River Birch	Sun,Part,Shade	Wet,Moist
Tree	<i>Liquidambar styraciflua</i>	Sweetgum	Sun,Part,Shade	Wet,Moist,Dry
Tree	<i>Platanus occidentalis</i>	American Sycamore	Sun,Part	Wet,Moist,Dry
Tree	<i>Quercus lyrata</i>	Overcup Oak	Sun,Part,Shade	Wet,Moist
Tree	<i>Quercus michauxii</i>	Swamp Chestnut Oak	Sun,Part,Shade	Wet,Moist
Tree	<i>Quercus nigra</i>	Water Oak	Sun,Part	Wet,Moist,Dry
Tree	<i>Quercus phellos</i>	Willow Oak	Sun,Part	Wet,Moist,Dry
Tree	<i>Quercus texana</i>	Nuttall Oak	Sun,Part,Shade	Wet,Moist
Tree	<i>Ulmus rubra</i>	Slippery Elm	Sun,Part,Shade	Wet,Moist,Dry
Woody Shrub	<i>Alnus serrulata</i>	Tag Alder	Sun,Part,Shade	Wet,Moist
Woody Shrub	<i>Baccharis halimifolia</i>	Groundsel tree	Sun,Part	Wet,Moist,Dry
Woody Shrub	<i>Cephalanthus occidentalis</i>	Buttonbush	Sun,Part,Shade	Water,Wet,Moist
Woody Shrub	<i>Cornus amomum</i>	Silky Dogwood	Sun,Part,Shade	Wet,Moist
Woody Shrub	<i>Ilex verticillata</i>	Winterberry	Sun,Part,Shade	Wet,Moist,Dry
Woody Shrub	<i>Lindera benzoin</i>	Spicebush	Sun,Part	Wet,Moist,Dry

Modified for specific site conditions and requirements from Virginia Department of Recreation (DCR) Virginia Native Plant finder at <https://www.dcr.virginia.gov/natural-heritage/native-plants-finder> and Mississippi Native Plant Society in-state Native Plant Resources at <https://www.msnativeplantsociety.org/native-plant-resources.html>

Figure 6. Recommended Planting Palette

Periodic monitoring to ensure successful establishment of wetland plant communities that support an ecosystem performing the desired functions floodwater storage, filtration, groundwater recharge, and wildlife habitat could be conducted via periodic monitoring practices. Photographic documentation, vegetation community data collection, and woody stem counts could be performed at permanent monitoring stations within the restoration area. Approximately 1 plot per acre (or 14-15 plots) each with a radius of 30 ft and distributed randomly within the mitigation area would sufficiently document on-site conditions and ensure tree survival goals are

achieved (USACE 1995). Within 30ft plots, each woody stem present should be recorded, and the approximate cover of non-native invasive vegetation should be documented.

Following the collection of vegetation data some basic analyses should be performed to determine if mitigation standards are met following each monitoring season. Tree data should be assessed to ensure that a minimum of a 90% survival rate of planted woody stems is achieved after year 5, and that a woody stem density of approximately 300-400 stems per acre will be achieved. Invasive vegetation should be removed wherever found throughout the monitoring period, with a goal of maintaining a maximum of 10% overall invasive vegetation cover throughout the mitigation area (DeBerry and Hunter, 2021). Re-planting/seeding, and removal of non-native invasive plants could be conducted until monitoring data demonstrate that the mitigation area performs the desired functions and satisfies requirements outlined in DO #77-1.

JUSTIFICATION FOR THE USE OF WETLANDS

The purpose of the proposed project is to improve recreational experiences for non-motorized users along this section of the Parkway. The needs are to develop a logical terminus to the trail corridor and improve accessibility at the southern end of the trail.

The NPS has determined that implementing the proposed action in conjunction with the proposed mitigation measures would not result in significant loss of wetlands or wetland function and values. Following the implementation of best management practices, restoration of the entire 14.17-acre area identified within NPS lands as a potential mitigation site would therefore result in compensation for all wetlands impacted by the proposed project and result in a surplus of 10.73 acres of restored wetlands. Restoration of this area would enhance the ecological value of the wetlands and surrounding landscape due to the restoration of native habitat and addition of hydrologic storage capacity.

LITERATURE CITED

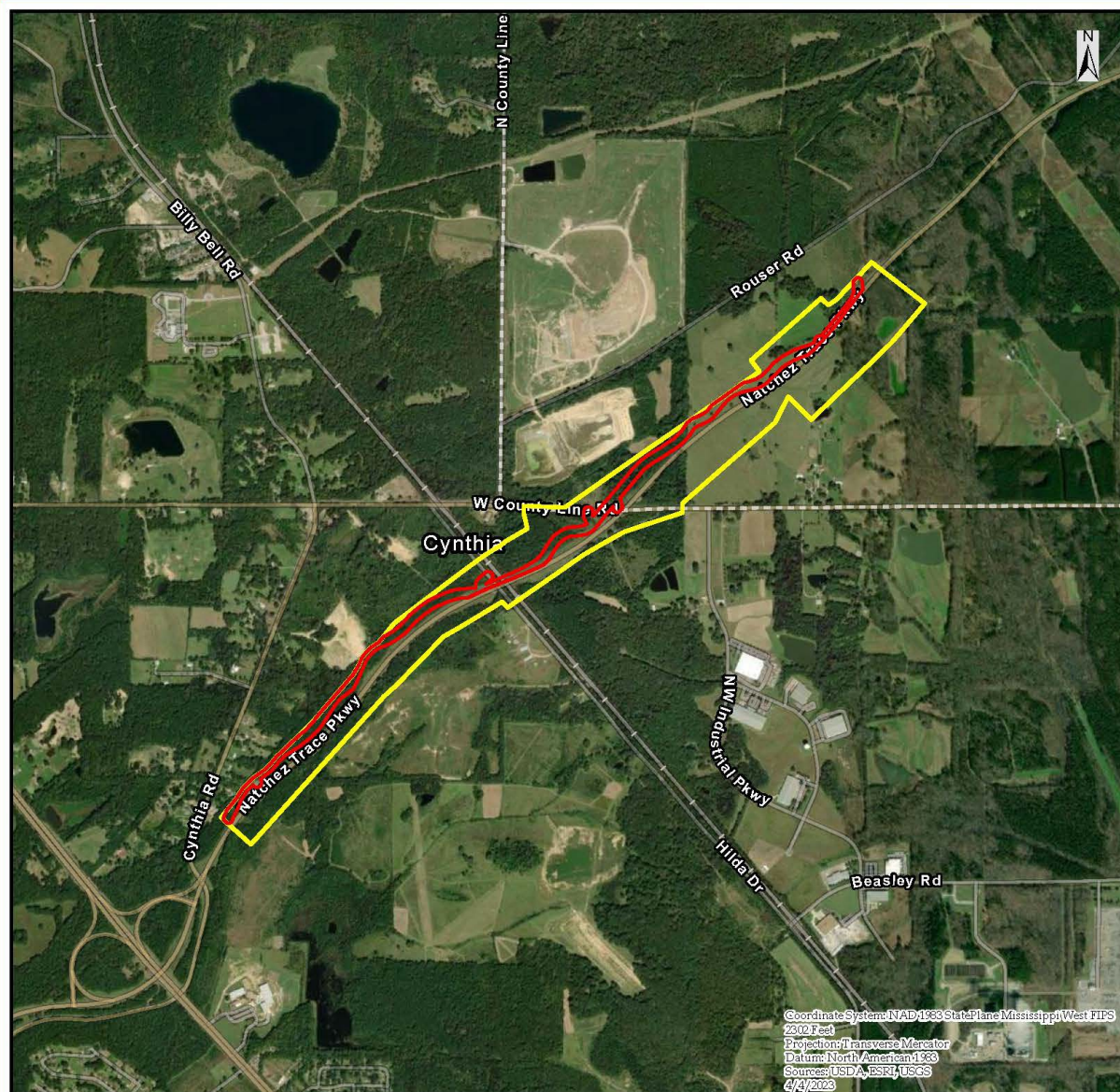
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Appendix A: Figures



Prepared for:

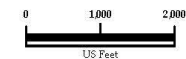
National Park Service

FIGURE 1:
 Aerial Overview of the
 Natchez Trace Multi-Use Trail
 Wetlands and Waters Delineation Project

Madison County, Mississippi

Legend

- National Park Service Lands
- Study Area



Scale: 1 in = 2,000 ft

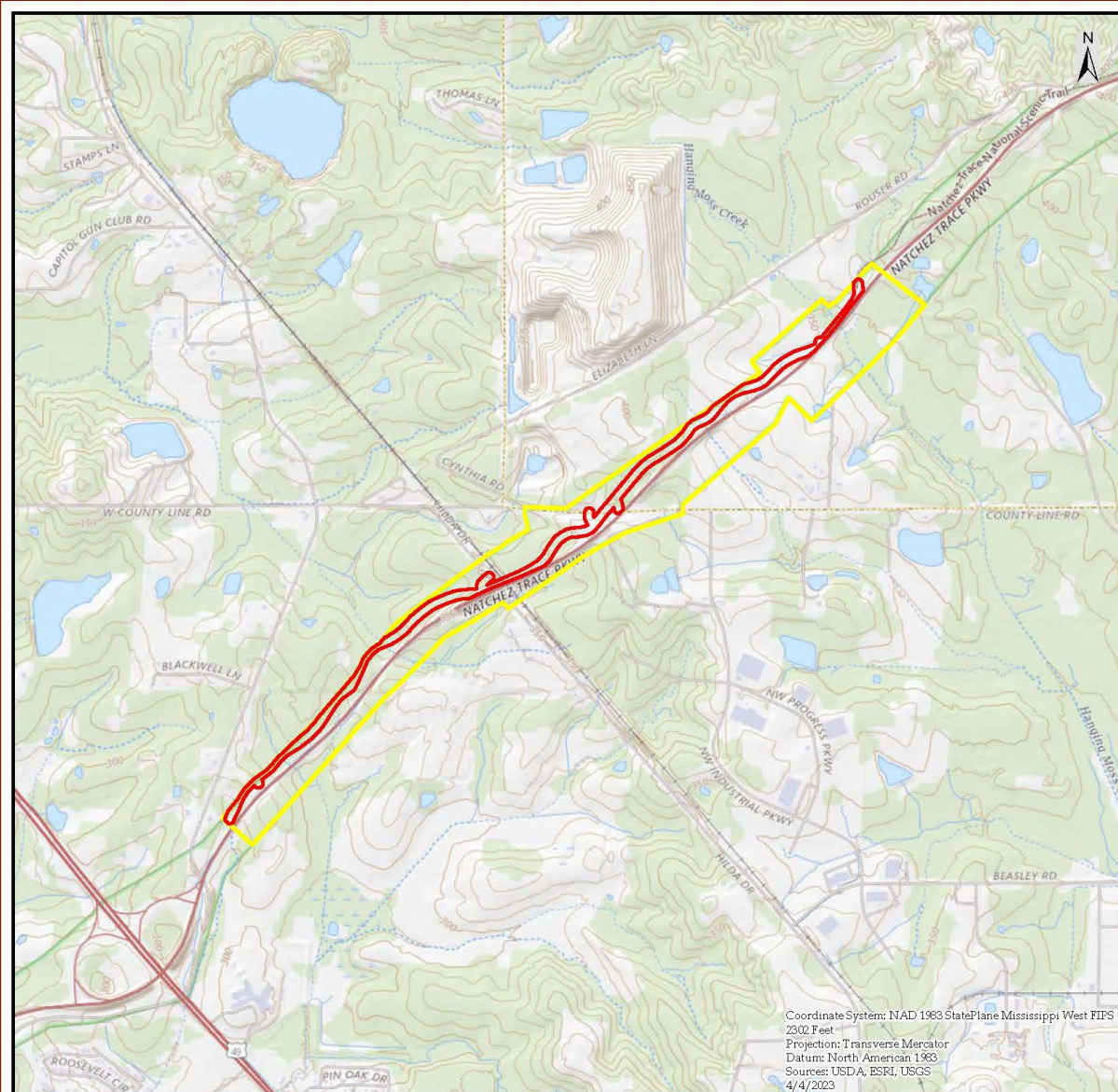
Prepared by :

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 P.O. Box 73
 Paint Lick, Kentucky 40461

Drawn by: TC Date: 4/4/2023

Checked by: IB Revision: 01





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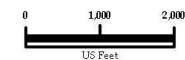
National Park Service

FIGURE 2:
USGS Topographic Overview of the
Natchez Trace Multi-Use Trail
Wetlands and Waters Delineation Project

Madison County, Mississippi

Legend

- National Park Service Lands
- Study Area



Scale: 1 in = 2,000 ft

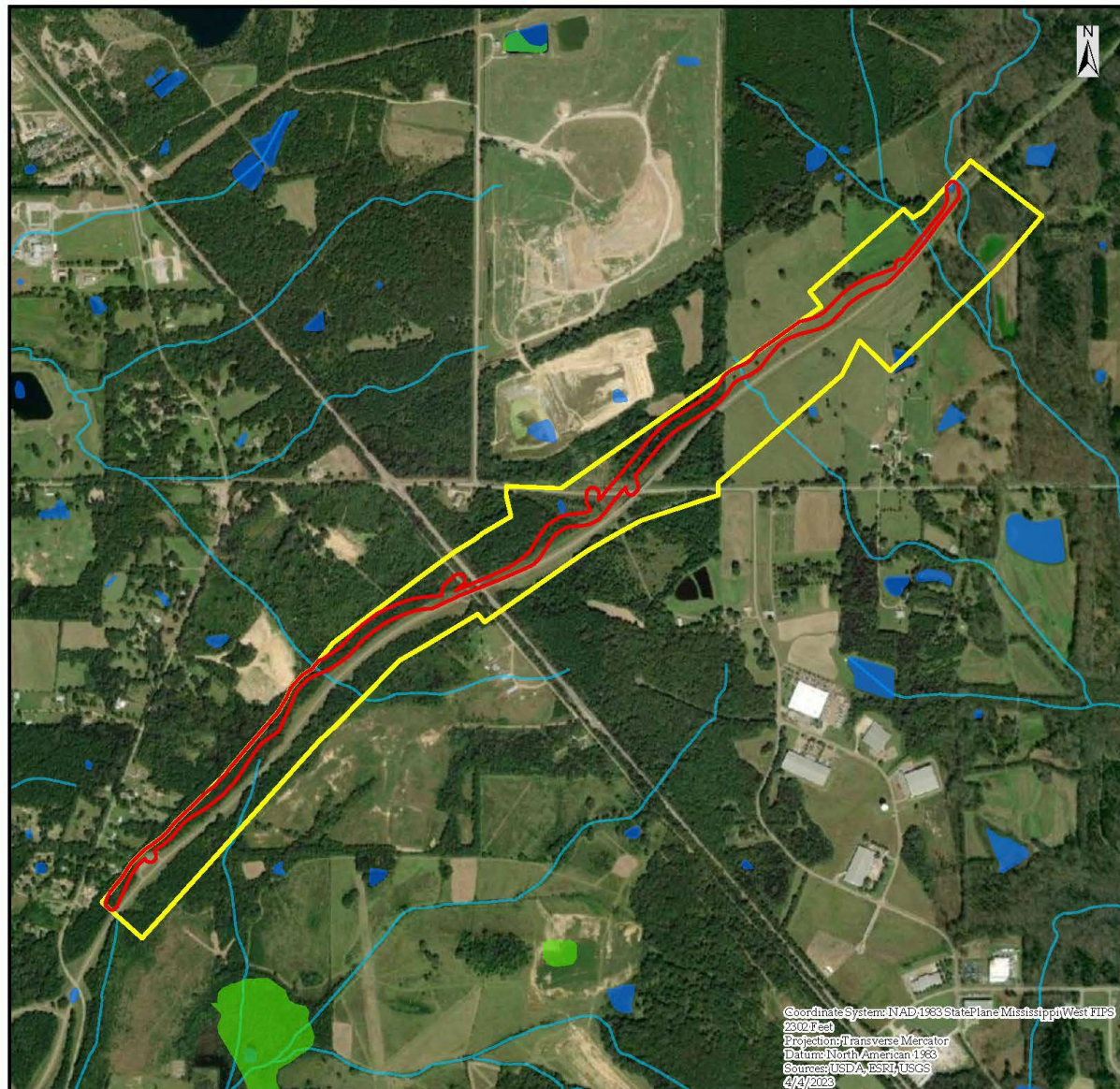
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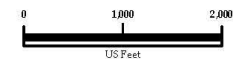
National Park Service

FIGURE 3:
Existing Hydrology for the Natchez
Trace Multi-Use Trail Wetlands and
Waters Delineation Study Area

Madison County, Mississippi

Legend

- NHD Waterway
- NHD Waterbody
- NWI Wetland
- National Park Service Lands
- Study Area



Scale: 1 in = 1,500 ft

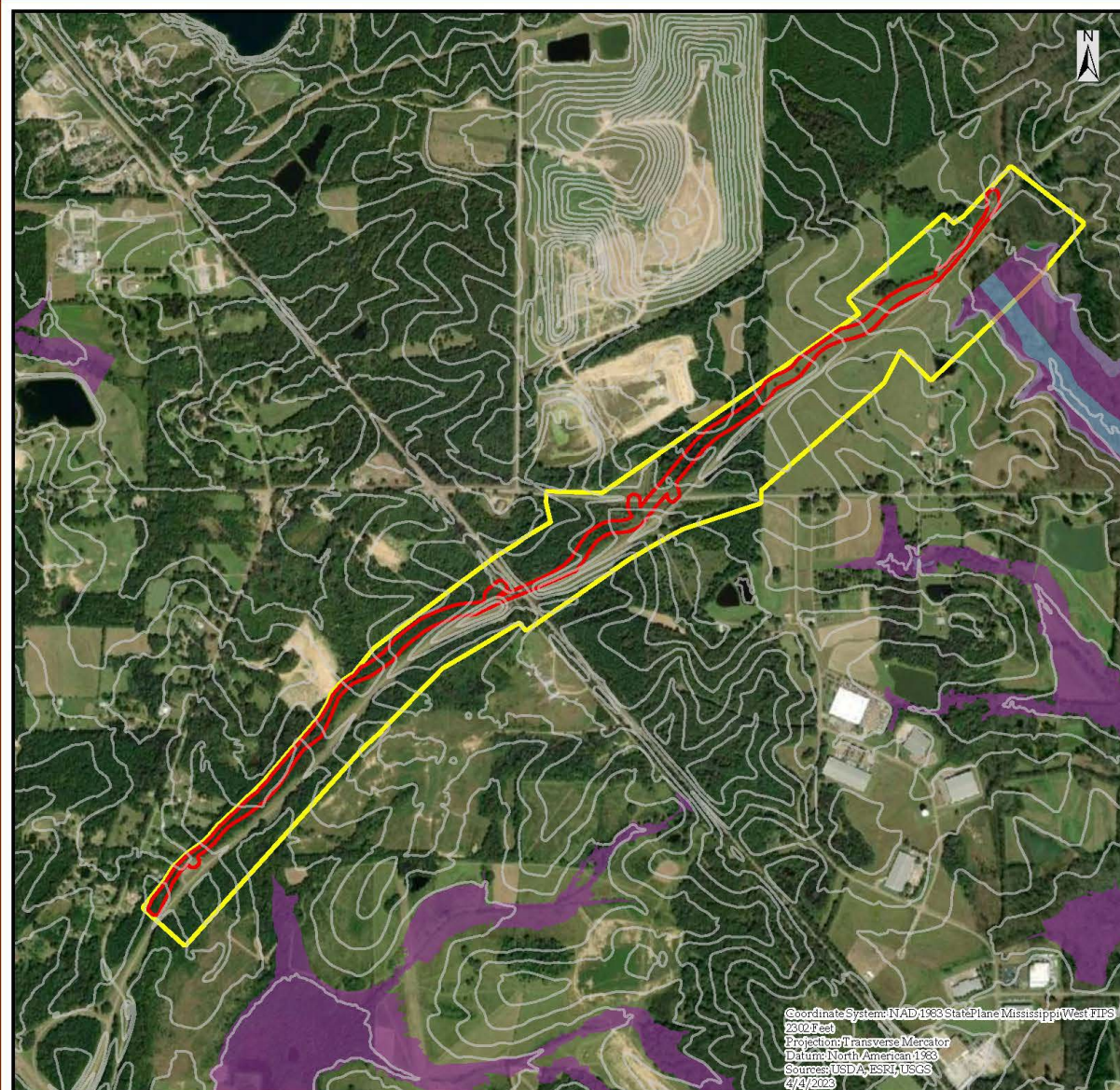
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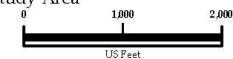
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National Park Service

FIGURE 4:
FEMA Flood Zone And Contours for the
Natchez Trace Multi-Use
Trail Wetlands and Waters
Delineation Project
Madison County, Mississippi

Legend

- Topographic Contour Line
- 0.2% Annual Chance Flood Hazard
- 1% Annual Chance Flood Hazard
- Regulatory Floodway
- National Park Service Lands
- Study Area



Scale: 1 in = 1,500 ft

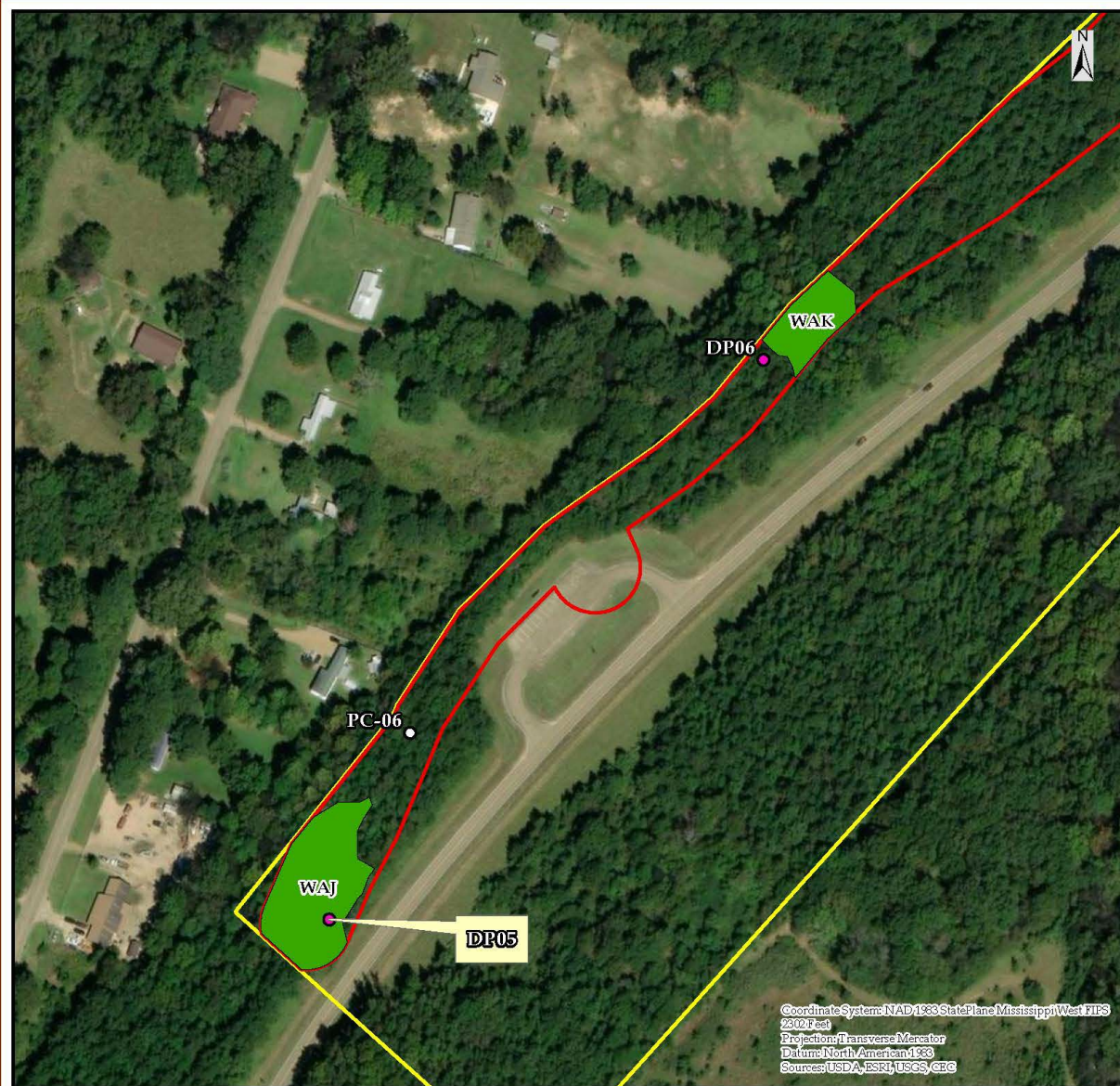
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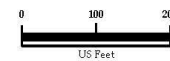
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FIGURE 5.1:
 Wetland Delineation for the
 Natchez Trace Multi-Use
 Trail Wetlands and Waters
 Delineation Project
 Madison County, Mississippi

Legend

- Culvert
- Photo
- Wetland Data Point
- R2 (Lower Perennial)
- R4 (Intermittent)
- Ditch
- UDF
- PFO
- PSS
- PEM
- National Park Service Lands
- Study Area

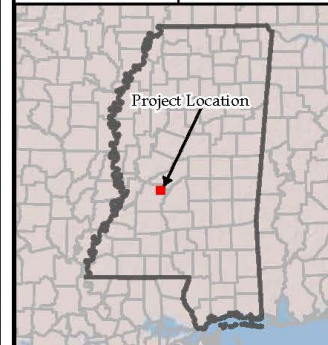


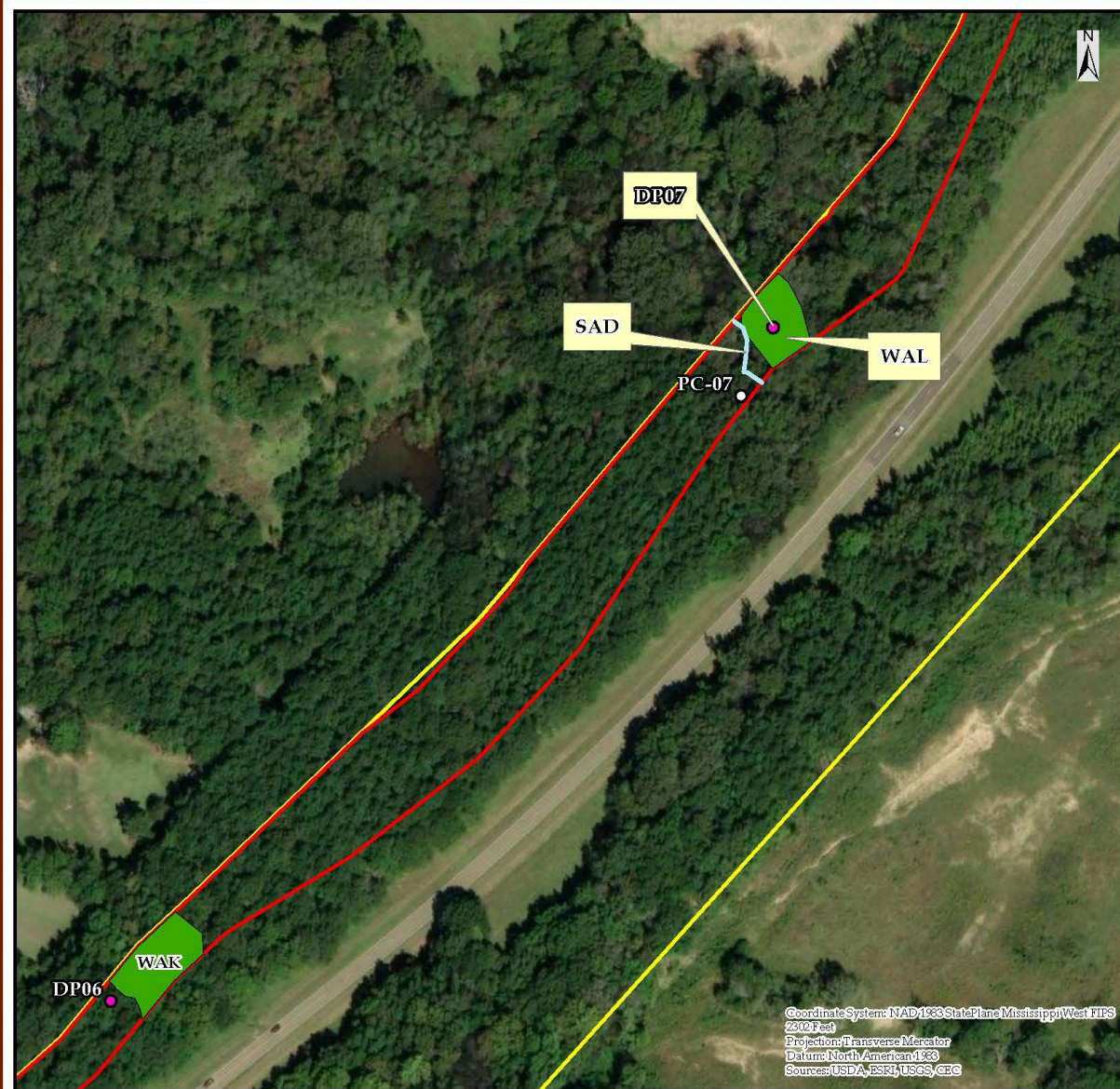
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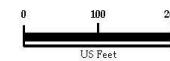
Prepared for:

National Park Service

FIGURE 5.2:
 Wetland Delineation for the
 Natchez Trace Multi-Use
 Trail Wetlands and Waters
 Delineation Project
 Madison County, Mississippi

Legend

- Culvert
- Photo
- Wetland Data Point
- R2 (Lower Perennial)
- R4 (Intermittent)
- Ditch
- UDF
- PFO
- PSS
- PEM
- National Park Service Lands
- Study Area



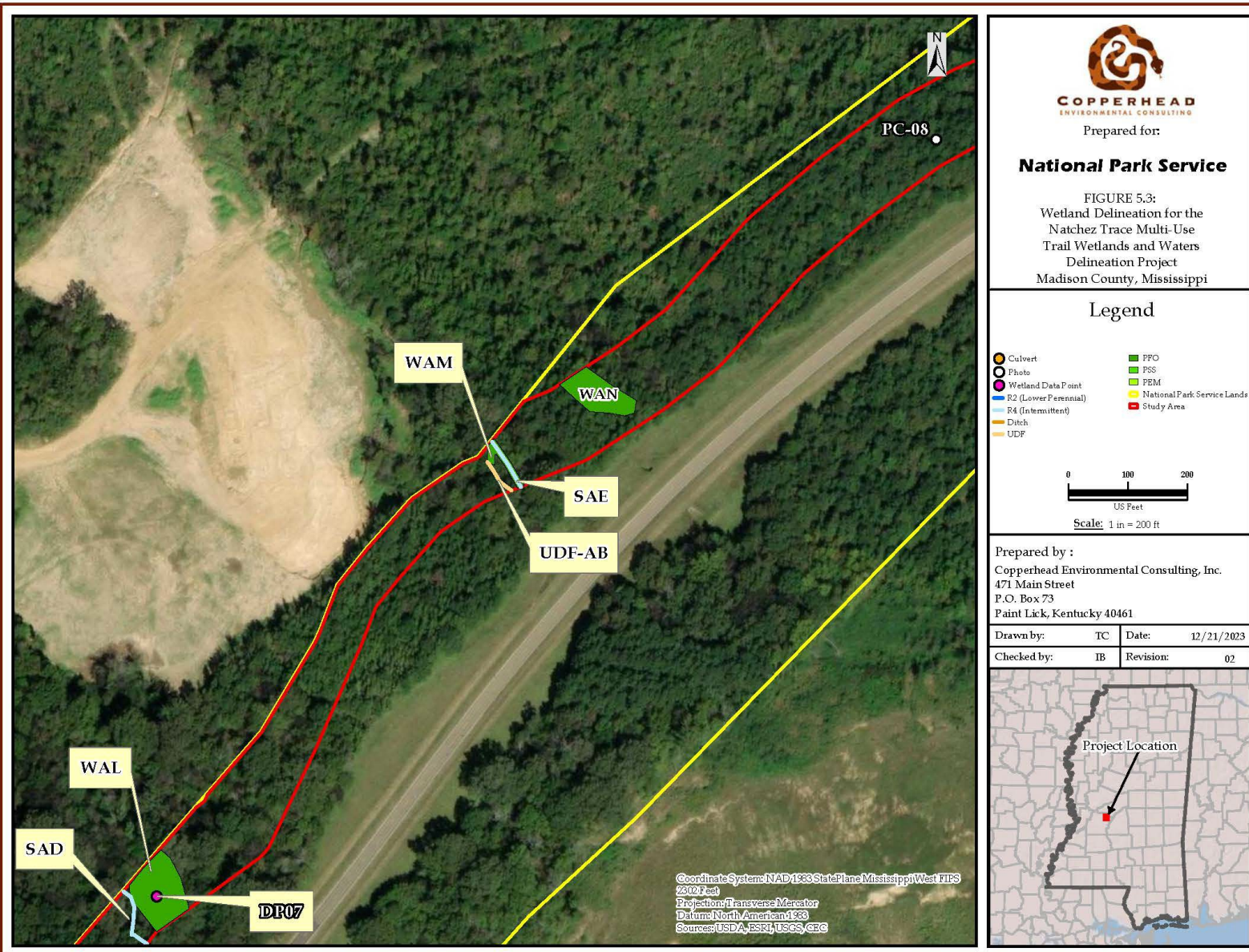
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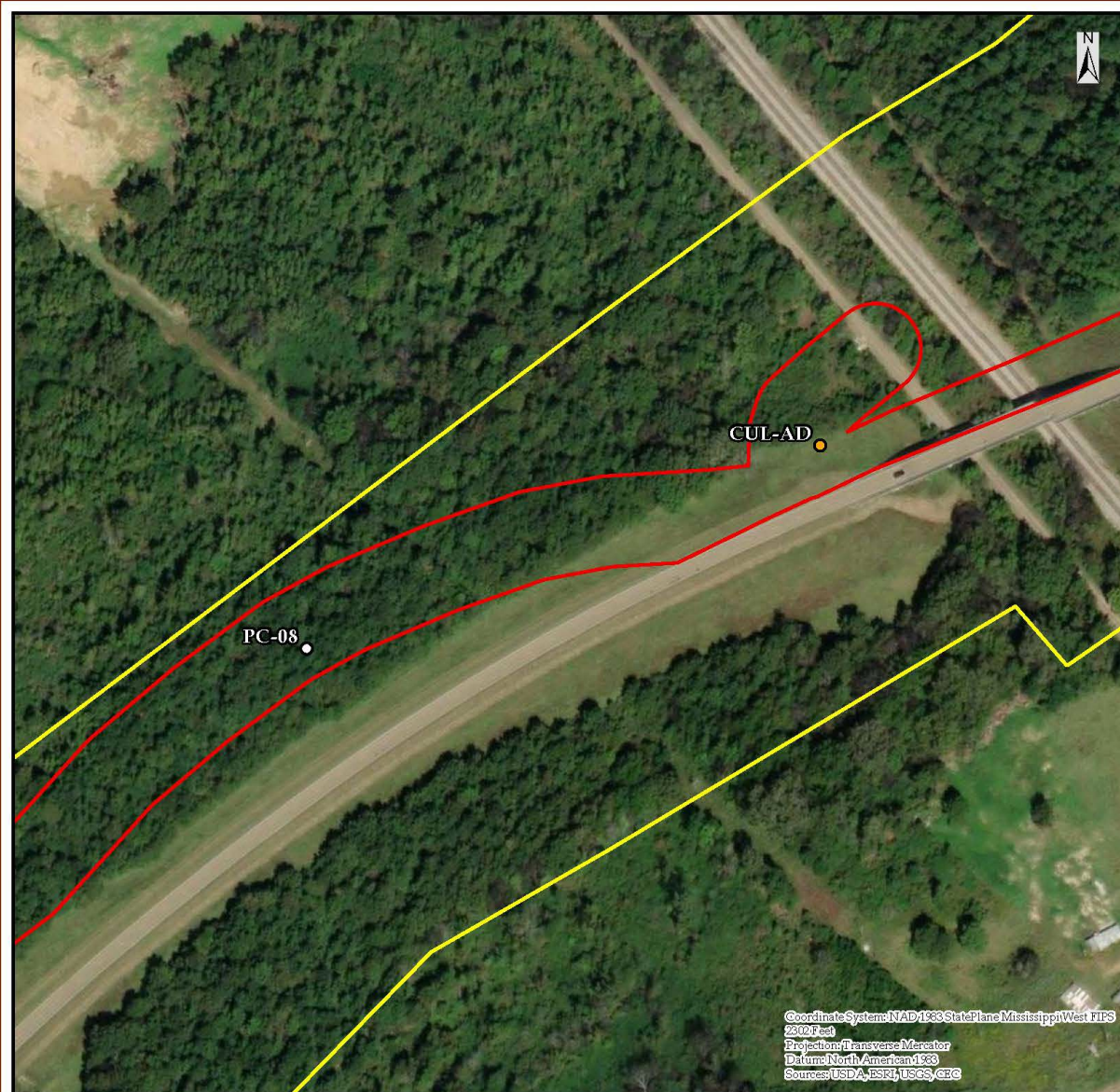
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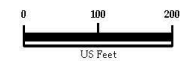
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FIGURE 5.4:
 Wetland Delineation for the
 Natchez Trace Multi-Use
 Trail Wetlands and Waters
 Delineation Project
 Madison County, Mississippi

Legend

- Culvert
- Photo
- Wetland Data Point
- R2 (Lower Perennial)
- R4 (Intermittent)
- Ditch
- UDF
- PFO
- PSS
- PEM
- National Park Service Lands
- Study Area



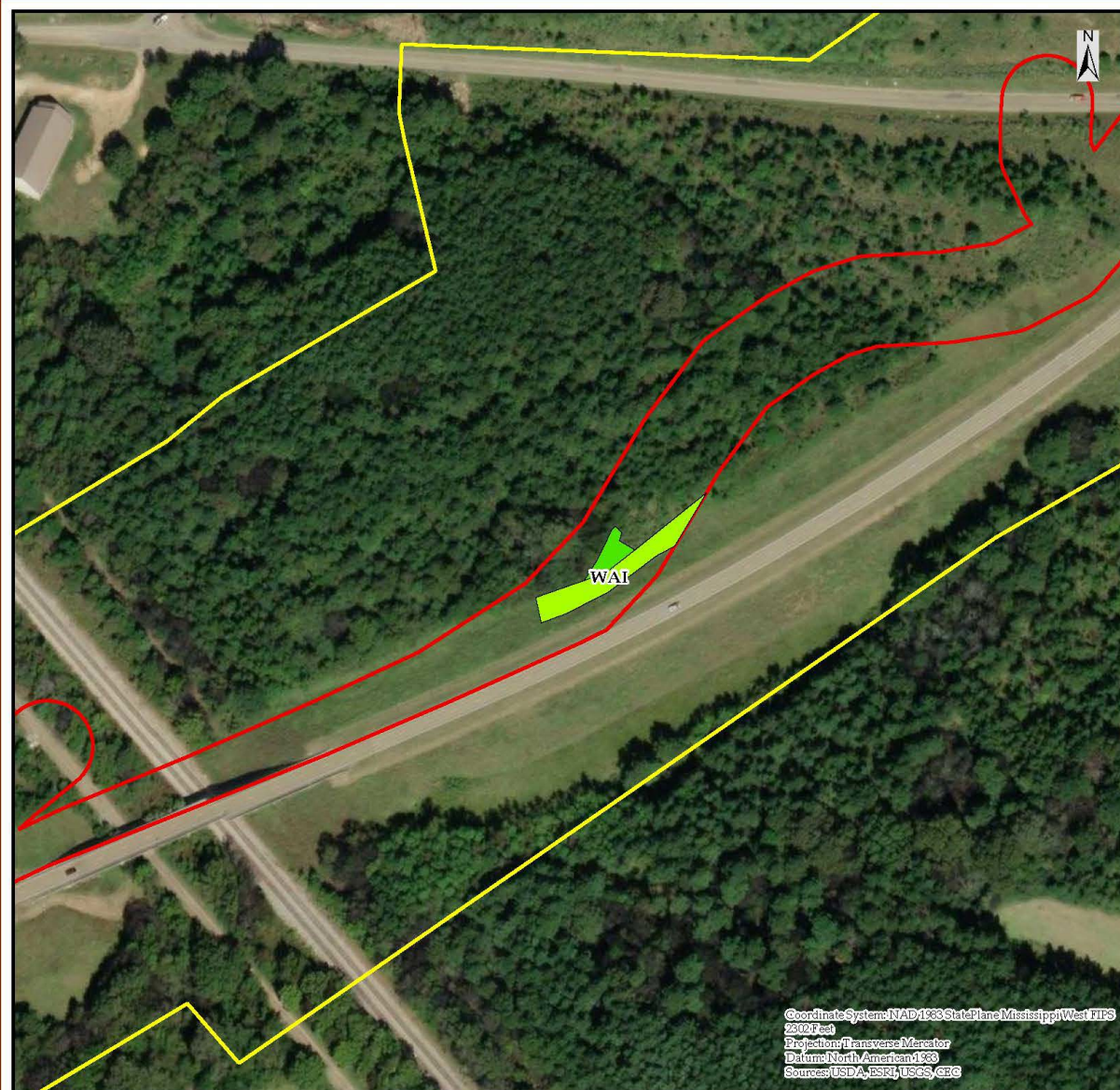
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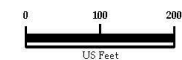
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FIGURE 5.5:
 Wetland Delineation for the
 Natchez Trace Multi-Use
 Trail Wetlands and Waters
 Delineation Project
 Madison County, Mississippi

Legend

- Culvert
- Photo
- Wetland Data Point
- R2 (Lower Perennial)
- R4 (Intermittent)
- Ditch
- UDF
- PFO
- PSS
- PEM
- National Park Service Lands
- Study Area



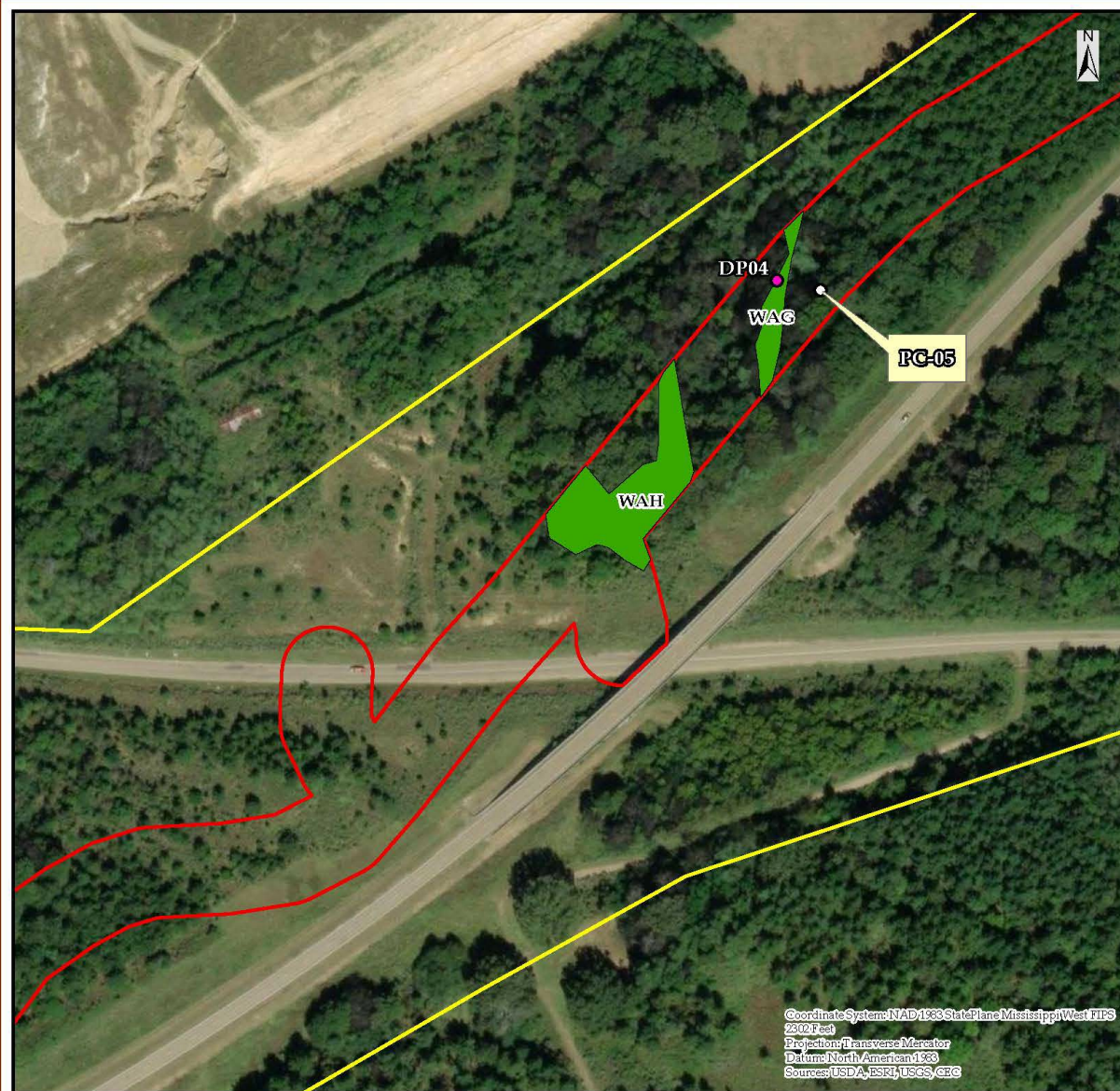
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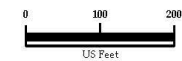
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FIGURE 5.6:
Wetland Delineation for the
Natchez Trace Multi-Use
Trail Wetlands and Waters
Delineation Project
Madison County, Mississippi

Legend

- Culvert
- Photo
- Wetland Data Point
- R2 (Lower Perennial)
- R4 (Intermittent)
- Ditch
- UDF
- PFO
- PSS
- PEM
- National Park Service Lands
- Study Area



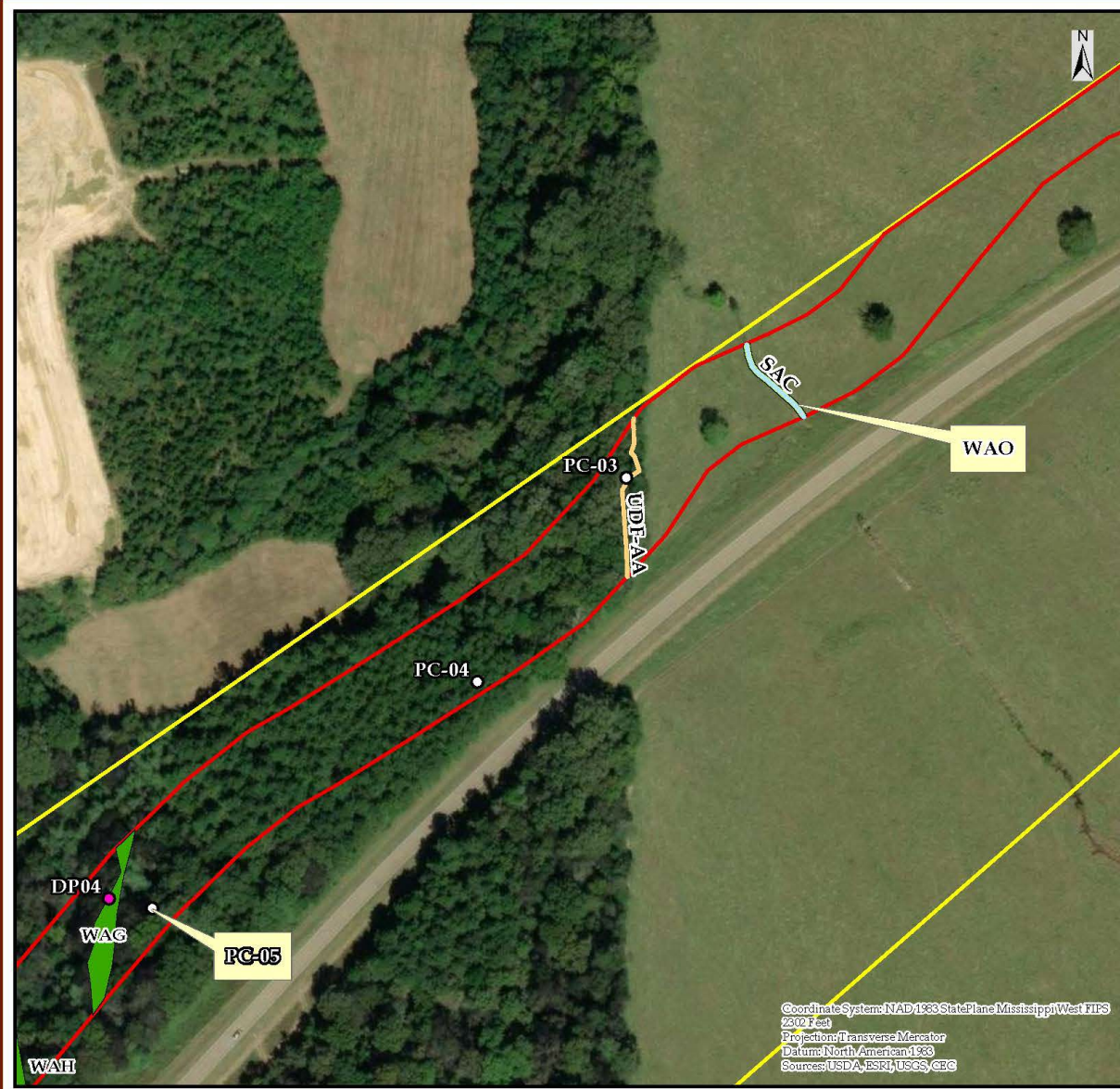
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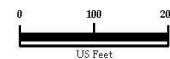
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FIGURE 5.7:
Wetland Delineation for the
Natchez Trace Multi-Use
Trail Wetlands and Waters
Delineation Project
Madison County, Mississippi

Legend

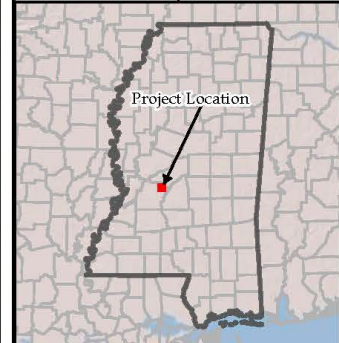
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- Photo
- Wetland Data Point
- R2 (Lower Perennial)
- R4 (Intermittent)
- Ditch
- UDF
- PFO
- PSS
- PEM
- National Park Service Lands
- Study Area



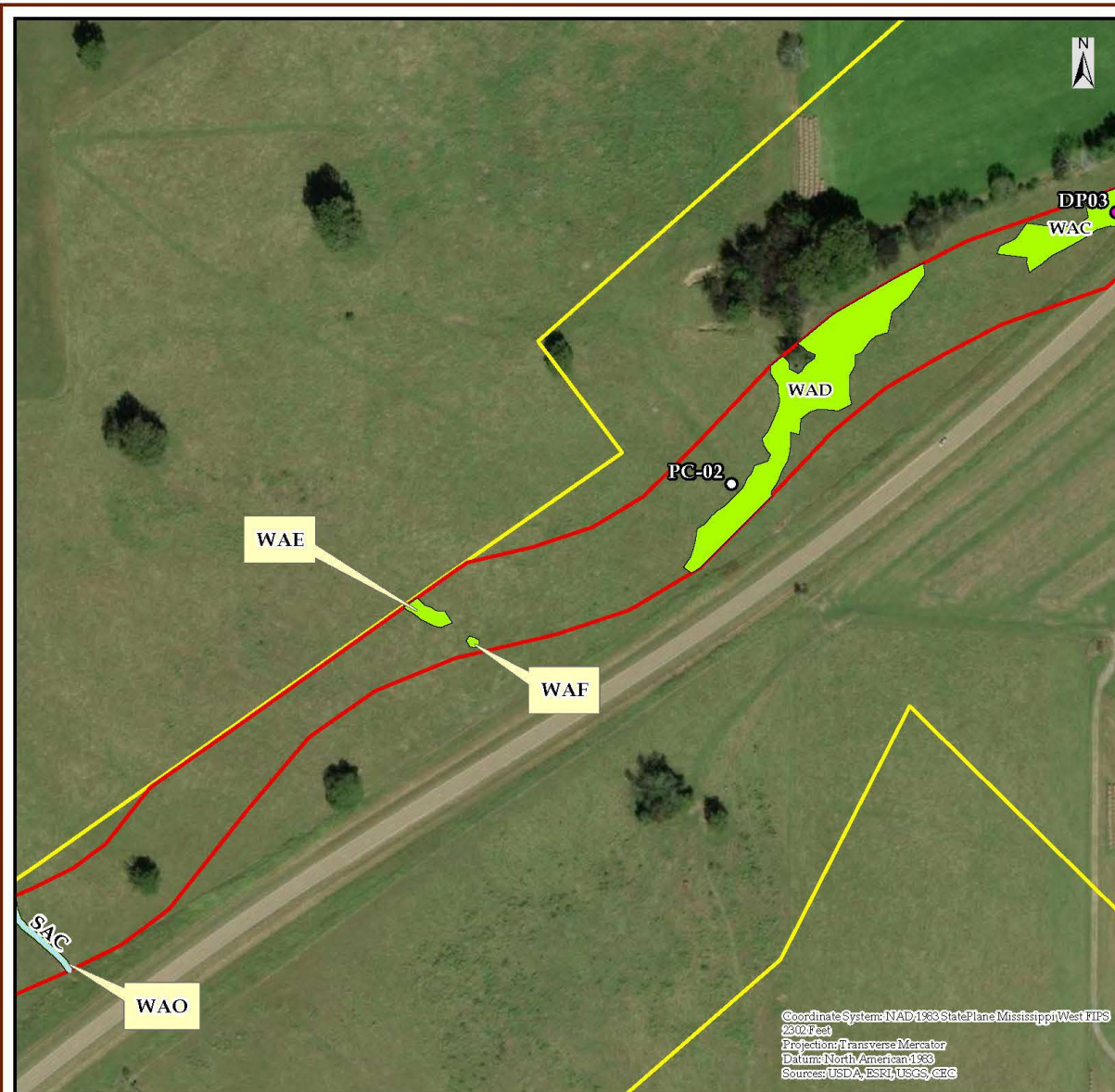
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Checked by:	IB	Revision:	02



Coordinate System: NAD1983 StatePlane Mississippi West FIPS
2600 Feet
Projection: Transverse Mercator
Datum: North American 1983
Source: USDA, ESRI, USGS, CEC



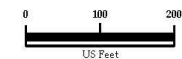
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FIGURE 5.8:
 Wetland Delineation for the
 Natchez Trace Multi-Use
 Trail Wetlands and Waters
 Delineation Project
 Madison County, Mississippi

Legend

- Culvert
- Photo
- Wetland Data Point
- R2 (Lower Perennial)
- R4 (Intermittent)
- Ditch
- UDF
- PFO
- PSS
- FEM
- National Park Service Lands
- Study Area



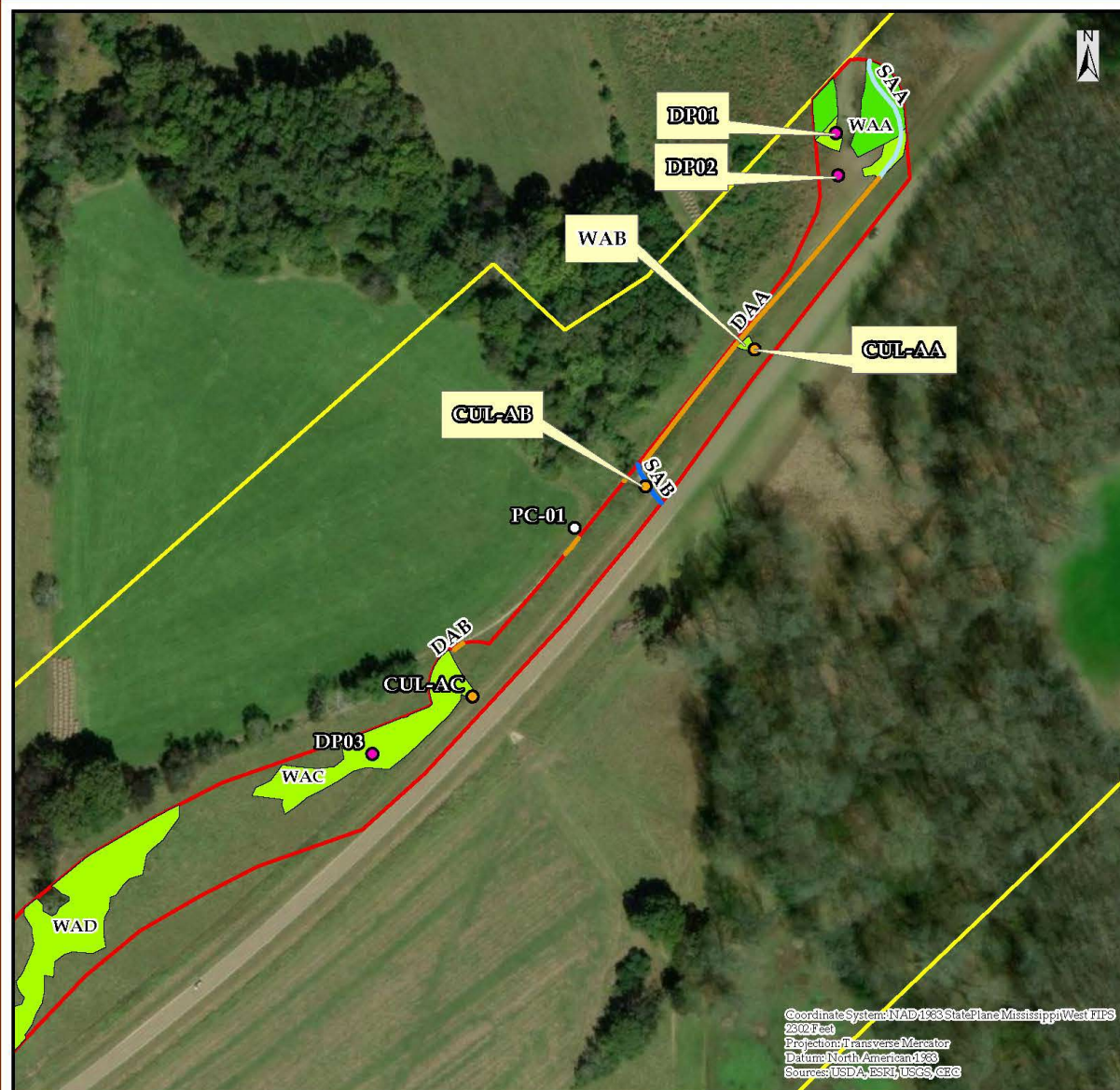
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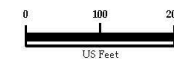
Prepared for:

National Park Service

FIGURE 5.9:
Wetland Delineation for the
Natchez Trace Multi-Use
Trail Wetlands and Waters
Delineation Project
Madison County, Mississippi

Legend

- Culvert
- Photo
- Wetland Data Point
- R2 (Lower Perennial)
- R4 (Intermittent)
- Ditch
- UDF
- PFO
- PSS
- FEM
- National Park Service Lands
- Study Area



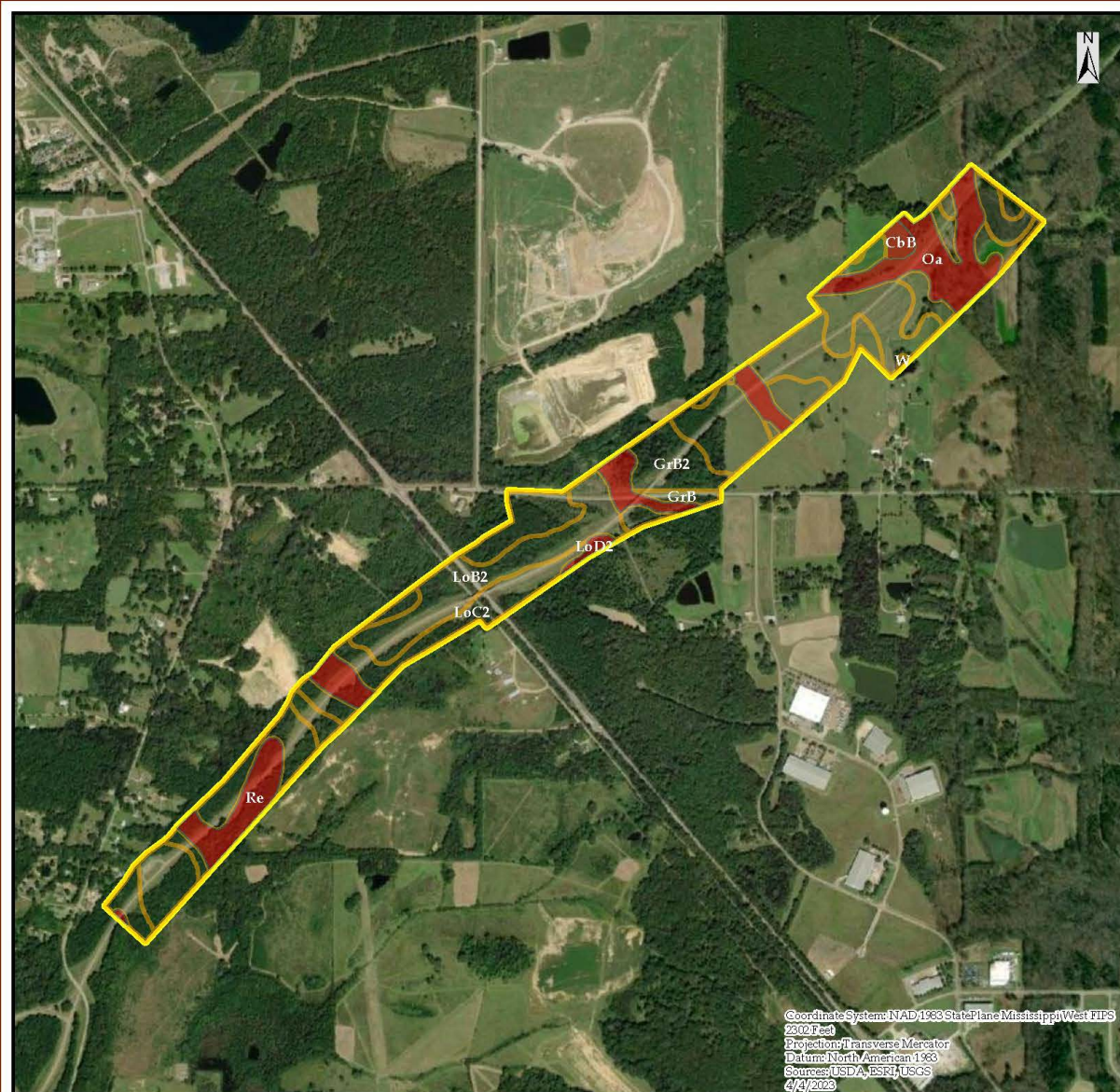
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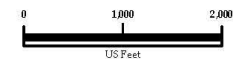
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FIGURE 6:
 USDA SSURGO Soil Types for the
 Natchez Trace Multi-Use
 Trail Wetlands and Waters
 Delineation Project
 Madison County, Mississippi

Legend

- Hydric Soil
- Non-Hydric Soil
- National Park Service Lands



Scale: 1 in = 1,500 ft

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Drawn by: TC Date: 4/4/2023

Checked by: IB Revision: 01



Appendix C: Consultation and Coordination



United States Department of the Interior



NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804

November 16, 2023

SENT VIA ELECTRONIC CORRESPONDENCE

Ms. Alison McCartney
Acting Section 7 Supervisor
U.S. Fish and Wildlife Service
6578 Dogwood View Parkway Suite A
Jackson, Mississippi 39213

Subject: Section 7 Informal Consultation Letter
Project Code: 2023-0122177
Chisa-Foka Multi-Use Trail Extension Madison and Hinds County, Mississippi

Dear Ms. McCartney:

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), is proposing to carry out the Chisa-Foka Multi-Use Trail Extension Project (Project) as described below. This letter is to request Endangered Species Act (ESA) concurrence from your office for the northern long-eared bat (*Myotis septentrionalis*), tricolored bat (*Perimyotis subflavus*), alligator snapping turtle (*Macrochelys temminckii*), and ringed map turtle (*Graptemys oculifera*). We have made the determination that the proposed activity may affect, but is not likely to adversely affect, or will have no effect on any species listed as threatened or endangered by the USFWS under the ESA of 1973, as amended. It was also determined the project would not likely jeopardize the continued existence of the alligator snapping turtle, a federally proposed threatened species, or the tricolored bat, a federally proposed endangered species. Supporting information is provided below.

The proposed Project includes construction and operation of a 2.5-mile long and 10-foot-wide paved shared-use trail parallel to and within the Natchez Trace Parkway boundary from approximately milepost 93.5 to milepost 95.9 near Jackson, Mississippi (Figure attached). This 2.5-mile portion of the trail would follow the alignment identified in the September 1995 Multi-Use Trail Study Environmental Assessment.

A records search for state and federally listed species within two miles of the project area was requested from the Mississippi Natural Heritage Program. No federally listed species were identified in the records request. Trees in the project area provide suitable roosting habitat for the federally threatened northern long-eared bat and proposed endangered tricolored bat. To minimize impacts on these species, trees would be cleared during the winter season (November 15 – March 31) when bats are considered inactive. Based on the lack of records and proposed minimization measures, the project is “**not likely to jeopardize the continued existence**” of the tricolored bat. The Project is not located within 0.5 miles of a known hibernacula or within 150-ft of a known maternity roost for the northern long-eared bat. Based on the Interim Consultation Framework published by USFWS on March 6, 2023, for projects consistent with the former 4(d) rule, the project “**may affect, [but is] not likely to adversely affect**” the northern long-eared bat. The USFWS Concurrence Letter from the Northern Long-eared Bat Rangewide Determination Key is provided as an attachment.

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

Habitat for the proposed threatened alligator snapping turtle (large rivers and major tributaries, but also small streams, bayous, canals, swamps, lakes, reservoirs, and ponds) is present in linear wetlands in the project area. The USFWS has proposed but not yet finalized an ESA Section 4(d) rule for the alligator snapping turtle that would prohibit harvest and promote the conservation of the species. Because linear wetlands would be crossed with bridges and Best Management Practices would be used, impacts on habitat would be minimized. As a result, the project is “**not likely to jeopardize the continued existence**” of the alligator snapping turtle. Habitat for the federally threatened ringed map turtle (wide rivers with moderate to strong currents) is not present within the project area and there would be **no effect** on this species.

The NPS respectfully request your review and concurrence regarding the proposed Project.

Sincerely,

Deanna Boensch
Natural Resource Program Manager
Natchez Trace Parkway
2680 Natchez Trace Pkwy.
Tupelo, MS 38804

X

Alison McCartney
Acting Section 7 Supervisor

Attachments:
PDF Project Figure
USFWS NLEB Concurrence letter

cc:
Dr. Christina Smith, Chief of Resource Management, Natchez Trace Parkway, NPS



ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

A. DESCRIPTION OF UNDERTAKING

1. **Park:** Natchez Trace Parkway

2. Project Description:

Project Name: Construct 3P19 and 3P20 Multi-Use Trail Sections

Prepared by: Christina Smith **Date Prepared:** 11/28/2022 **Telephone:** 662.840.7560

PEPC Project Number: 108516

Locations: County, State: Hinds, MS **County, State:** Madison, MS **Geographic Marker:** 93.5 - 95.9 (Milepost)

Describe project:

In 1995, the NPS developed an Environmental Assessment (EA) to analyze alternatives for a paved multi-use trail in the Jackson, MS area to be constructed parallel to and within the Parkway boundary. To date, approximately 12 miles have been constructed from Parkway milepost 108 to 95.9. The NPS proposes to move forward with constructing two more sections (3P19 and 3P20) between milepost 95.9 to 93.5. The two sections combined would total 2.5-miles in length and be 8 ft. wide. We have yet to determine if the trail surface will be paved or not.

Since the original assessment is now 28 years old, NPS hired a contract firm to develop a new assessment to analyze resource impacts. Southeast Archeological Center conducted the archeological survey. No National Register of Historic Places eligible properties were uncovered. Report is pending as of 2/3/2023.

Area of potential effects (as defined in 36 CFR 800.16[d])

The APE is located between mileposts 93.05 and 95.9 in Madison and Hinds counties in Mississippi on the northwest side of the Parkway. Please see the attached location map.

3. Has the area of potential effects been surveyed to identify historic properties?

☐ No
☒ Yes

Source or reference: Halchin, Jill. "Natchez Trace Parkway Archeological Overview and Assessment;" draft, 2005.

Thomason and Associates. "National Register Eligibility Assessment, the Natchez Trace Parkway," 2004

4. Potentially Affected Resource(s):

Archeological Resources Present: Yes

Archeological Resources Notes: NATR00230 (Unassigned State Number) 19th Century, NATR00231 (Unassigned State Number) 19th Century, NATR00337 (Unassigned State Number) 19th Century

Sites are not eligible for the National Register of Historic Places due to extensive disturbance and lack of historical significance. Report is forthcoming from SEAC and will be provided to SHPO and THPO's upon receipt.

Historical Structures/Resources Present: No

Cultural Landscapes Present: Yes

Cultural Landscapes Notes: The Parkway's designed historic landscape is present and is eligible for the National Register of Historic Places.

The Parkway was established as a unit of the NPS by an act of Congress in 1938 to commemorate the Old Natchez Trace, an overland route connecting Nashville, Tennessee and Natchez, Mississippi. As one of the oldest transportation routes in North American, its human use dates to 8000 Before the Common Era (BCE). The modern Parkway bisects the state of Mississippi, passes through northwest Alabama, and terminates south of Nashville.

The Parkway was conceived and developed as a designed landscape that integrates a traditional rural, agrarian, southern landscape experience; facilitates leisurely and scenic travel; and links scenic, cultural, and natural features of interest. The entire Parkway is eligible for listing in the National Register of Historic Places. It is eligible under Criterion A of the National Register Criteria for Evaluation since it is "associated with events that have made a significant contribution to the broad patterns of our history." It is also eligible under Criterion C since it embodies "the distinctive characteristics of a type, period, or method of construction."

This designed landscape was part of a larger NPS initiative. With the authorization of the Blue Ridge Parkway and Natchez Trace Parkway in the 1930s, the NPS began designing a new type of park unit. The NPS viewed the two projects as "pioneers in their respective fields of national recreational and historical motor travel."

Ethnographic Resources Present: No

5. The proposed action will: (check as many as apply)

- ☐ No Destroy, remove, or alter features/elements from a historic structure
- ☐ No Replace historic features/elements in kind
- ☐ No Add non-historic features/elements to a historic structure
- ☐ No Alter or remove features/elements of a historic setting or environment (inc. terrain)
- ☐ Yes Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape
- ☐ No Disturb, destroy, or make archeological resources inaccessible
- ☐ No Disturb, destroy, or make ethnographic resources inaccessible
- ☐ Yes Potentially affect presently unidentified cultural resources
- ☐ No Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources
- ☐ No Involve a real property transaction (exchange, sale, or lease of land or structures)
- ☐ Other (please specify): _____

6. Supporting Study Data:

(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

[X] Anthropologist

Name: Amanda Griffis

Date: 12/16/2022

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Standard 4-Step Process

[X] Archeologist

Name: Christina Smith

Date: 11/30/2022

Comments: SEAC conducted an archeological survey in 2022 and discovered no sites eligible for the National Register of Historic Places. Three sites discovered during a previous survey are in the APE but were determined to be not eligible based on severe disturbance and lack of historical significance. Report is forthcoming and will be provided to consulting parties upon receipt.

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations: Monitoring recommended. Monitoring required during construction.

Doc Method: Standard 4-Step Process

[X] Historical Landscape Architect

Name: Susan Hitchcock

Date: 12/27/2022

Comments: The NATR has been determined eligible for the NRHP (Thomason and Associates,2004). Mgt Category is Should Be Preserved and Maintained. Default Treatment is Preservation.

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations: The original 1995 EA covering this multi-use trail addressed the Parkway's landscape design and visual quality. The same mitigations mentioned in the excerpt below will be implemented: "Introducing a concrete or asphalt surfaced multi-use trail and numerous bridge structures into the park lands would depart from the overall visual continuity of the Natchez Trace Parkway. Yet, because the Natchez Trace Parkway will skirt the metropolitan Jackson area and residential subdivisions and commercial activities are many times either adjacent to the boundaries of the park lands or within sight of the park lands, motorists may not perceive the cumulative visual effect of the multi-use trail as detrimental to their overall parkway experience.

Steps would be taken, however, to mitigate the visual effects of the multi-use trail and its attendant features on both the parkway motorist and the trail user. Many sections of the multi-use trail and views of trail bridges would be partially screened by landscaping or softened by vegetation. The trail surface would not be striped and appropriate materials and colors would be used to help blend manmade elements, e.g. site furnishings and signs, into the natural surroundings of the park lands. Rails would be kept to a maximum height of 42" and caging of the trail bridges would be avoided, if possible."

Doc Method: Standard 4-Step Process

No Reviews From: Curator, Historical Architect, Historian, 106 Advisor, Other Advisor

C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS

1. Assessment of Effect:

☐ No Potential to Cause Effects
☐ No Historic Properties Affected
☒ No Adverse Effect
☐ Adverse Effect

2. Documentation Method:

[X] A. Standard 36 CFR Part 800 Consultation

Further consultation under 36 CFR Part 800 is needed.

[] B. Streamlined Review Under the 2008 Servicewide Programmatic Agreement (PA)

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

Applicable Streamlined Review Criteria

(Specify 1-16 of the list of streamlined review criteria.)

[] C. Undertaking Related to Park Specific or Another Agreement

The proposed undertaking is covered for Section 106 purposes under another document such as a park, region or statewide agreement established in accord with 36 CFR 800.7 or 36 CFR 800.14.

[] D. Combined NEPA/NHPA Process

Process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 is in accord with 36 CFR 800.8.c.

[] E. Memo to Project File

3. Consultation Information

SHPO Required: Yes

THPO Required: Yes

4. Stipulations and Conditions: Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

5. Mitigations/Treatment Measures: Measures to prevent or minimize loss or impairment of historic/prehistoric properties: (Remember that setting, location, and use may be relevant.)

Archeological monitoring required during construction. For cultural landscape mitigations, see notes below in Step 6.

6. Assessment of Effect Notes:

Archeological Resources: SEAC conducted an archeological survey of the proposed alignment. No new archeological sites were discovered and the three previously identified sites are not eligible for the National Register of Historic Places due to

extensive disturbance and lack of historical significance.

Cultural landscapes: The original 1995 EA covering this multi-use trail addressed the Parkway's landscape design and visual quality. The same mitigations mentioned in the excerpt below will be implemented:

"Introducing a concrete or asphalt surfaced multi-use trail and numerous bridge structures into the park lands would depart from the overall visual continuity of the Natchez Trace Parkway. Yet, because the Natchez Trace Parkway will skirt the metropolitan Jackson area and residential subdivisions and commercial activities are many times either adjacent to the boundaries of the park lands or within sight of the park lands, motorists may not perceive the cumulative visual effect of the multi-use trail as detrimental to their overall parkway experience.

Steps would be taken, however, to mitigate the visual effects of the multi-use trail and its attendant features on both the parkway motorist and the trail user. Many sections of the multi-use trail and views of trail bridges would be partially screened by landscaping or softened by vegetation. The trail surface would not be striped and appropriate materials and colors would be used to help blend manmade elements, e.g. site furnishings and signs, into the natural surroundings of the park lands. Rails would be kept to a maximum height of 42" and caging of the trail bridges would be avoided, if possible."

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

Compliance Specialist:

NHPA Specialist

Christina Smith _____ **Date:** _____

E. SUPERINTENDENT'S APPROVAL

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Superintendent: _____ **Date:** _____

Douglas Neighbor



United States Department of the Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Chairman Herbert G. Johnson, Sr.
Alabama-Coushatta Tribe of Texas
571 State Park Road 56
Livingston, TX 77351

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Chairman Johnson:

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

The NPS and FHWA propose to extend the trail by approximately 2.5 miles, beginning at the current southern terminus (milepost 95.9) and ending at the Osburn Stand Information Display parking lot (milepost 93.5). The area of potential effect (APE) is a 40-foot-wide corridor and 2.5 miles long as shown on the attached map. In Fall 2022, the NPS' Southeast Archeological Center conducted a Phase I archeological survey along the proposed route with a survey report forthcoming.

In accordance with §106 of the National Historic Preservation Act of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, we invite you to consult with us regarding the above-referenced undertaking. If you have any questions, please contact Christina Smith, Resource Management Chief, at (662) 840-7560.

Sincerely,

**DOUGLAS
NEIGHBOR**

Douglas Neighbor
Superintendent

Digitally signed by
DOUGLAS NEIGHBOR
Date: 2023.02.04 14:46:10
+06'00'

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Principal Chief Tarpie Yargee
Alabama-Quassarte Tribal Town
P.O. Box 187
Wetumka, OK 74883-0187

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Chief Yargee:

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

The NPS and FHWA propose to extend the trail by approximately 2.5 miles, beginning at the current southern terminus (milepost 95.9) and ending at the Osburn Stand Information Display parking lot (milepost 93.5). The area of potential effect (APE) is a 40-foot-wide corridor and 2.5 miles long as shown on the attached map. In Fall 2022, the NPS' Southeast Archeological Center conducted a Phase I archeological survey along the proposed route with a survey report forthcoming.

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Sincerely,

**DOUGLAS
NEIGHBOR**

Digitally signed by
DOUGLAS NEIGHBOR
Date: 2023.02.04 15:04:54
+06'00'

Douglas Neighbor
Superintendent

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

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United States Department of the Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Chairman Melissa Darden
Chitimacha Tribe of Louisiana
P.O. Box 661
Charenton, LA 70523

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Chairman Darden:

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

The NPS and FHWA propose to extend the trail by approximately 2.5 miles, beginning at the current southern terminus (milepost 95.9) and ending at the Osburn Stand Information Display parking lot (milepost 93.5). The area of potential effect (APE) is a 40-foot-wide corridor and 2.5 miles long as shown on the attached map. In Fall 2022, the NPS' Southeast Archeological Center conducted a Phase I archeological survey along the proposed route with a survey report forthcoming.

In accordance with §106 of the National Historic Preservation Act of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, we invite you to consult with us regarding the above-referenced undertaking. If you have any questions, please contact Christina Smith, Resource Management Chief, at (662) 840-7560.

Sincerely,

**DOUGLAS
NEIGHBOR**

Douglas Neighbor
Superintendent

Digitally signed by DOUGLAS
NEIGHBOR
Date: 2023.02.04 14:44:52
+06'00'

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Tribal Chief Cheryl B. Smith
Jena Band of Choctaw Indians
P.O. Box 14
Jena, LA 71342

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Chief Smith:

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

The NPS and FHWA propose to extend the trail by approximately 2.5 miles, beginning at the current southern terminus (milepost 95.9) and ending at the Osburn Stand Information Display parking lot (milepost 93.5). The area of potential effect (APE) is a 40-foot-wide corridor and 2.5 miles long as shown on the attached map. In Fall 2022, the NPS' Southeast Archeological Center conducted a Phase I archeological survey along the proposed route with a survey report forthcoming.

In accordance with §106 of the National Historic Preservation Act of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, we invite you to consult with us regarding the above-referenced undertaking. If you have any questions, please contact Christina Smith, Resource Management Chief, at (662) 840-7560.

Sincerely,

**DOUGLAS
NEIGHBOR**

Douglas Neighbor
Superintendent

Digitally signed by
DOUGLAS NEIGHBOR
Date: 2023.02.04 14:47:04
-06'00'

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



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NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Town King Jeremiah Hobia
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Town King Hobia,

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

The NPS and FHWA propose to extend the trail by approximately 2.5 miles, beginning at the current southern terminus (milepost 95.9) and ending at the Osburn Stand Information Display parking lot (milepost 93.5). The area of potential effect (APE) is a 40-foot-wide corridor and 2.5 miles long as shown on the attached map. In Fall 2022, the NPS' Southeast Archeological Center conducted a Phase I archeological survey along the proposed route with a survey report forthcoming.

In accordance with §106 of the National Historic Preservation Act of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, we invite you to consult with us regarding the above-referenced undertaking. If you have any questions, please contact Christina Smith, Resource Management Chief, at (662) 840-7560.

Sincerely,

**DOUGLAS
NEIGHBOR**

Douglas Neighbor
Superintendent

Digitally signed by
DOUGLAS NEIGHBOR
Date: 2023.02.04 14:49:40
-06'00'

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



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NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Tribal Chief Cyrus Ben
Mississippi Band of Choctaw Indians
101 Industrial Road
Choctaw, MS 39350

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Chief Ben,

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

The NPS and FHWA propose to extend the trail by approximately 2.5 miles, beginning at the current southern terminus (milepost 95.9) and ending at the Osburn Stand Information Display parking lot (milepost 93.5). The area of potential effect (APE) is a 40-foot-wide corridor and 2.5 miles long as shown on the attached map. In Fall 2022, the NPS' Southeast Archeological Center conducted a Phase I archeological survey along the proposed route with a survey report forthcoming.

In accordance with §106 of the National Historic Preservation Act of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, we invite you to consult with us regarding the above-referenced undertaking. If you have any questions, please contact Christina Smith, Resource Management Chief, at (662) 840-7560.

Sincerely,

**DOUGLAS
NEIGHBOR**

Douglas Neighbor
Superintendent

Digitally signed by
DOUGLAS NEIGHBOR
Date: 2023.02.04 14:48:03
-06'00'

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

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NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Principal Chief David Hill
Muscogee (Creek) Nation
P.O. Box 580
Okmulgee, OK 74447

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Principal Chief Hill,

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

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In accordance with §106 of the National Historic Preservation Act of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, we invite you to consult with us regarding the above-referenced undertaking. If you have any questions, please contact Christina Smith, Resource Management Chief, at (662) 840-7560.

Sincerely,

**DOUGLAS
NEIGHBOR**

Douglas Neighbor
Superintendent

Digitally signed by
DOUGLAS NEIGHBOR
Date: 2023.02.04 14:50:28
-06'00'

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

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United States Department of the Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Tribal Chair Stephanie A. Bryan
Poarch Band of Creek Indians
5811 Jack Springs Road
Atmore, AL 36502

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Tribal Chair Bryan,

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

The NPS and FHWA propose to extend the trail by approximately 2.5 miles, beginning at the current southern terminus (milepost 95.9) and ending at the Osburn Stand Information Display parking lot (milepost 93.5). The area of potential effect (APE) is a 40-foot-wide corridor and 2.5 miles long as shown on the attached map. In Fall 2022, the NPS' Southeast Archeological Center conducted a Phase I archeological survey along the proposed route with a survey report forthcoming.

In accordance with §106 of the National Historic Preservation Act of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, we invite you to consult with us regarding the above-referenced undertaking. If you have any questions, please contact Christina Smith, Resource Management Chief, at (662) 840-7560.

Sincerely,

**DOUGLAS
NEIGHBOR**

Douglas Neighbor
Superintendent

Digitally signed by
DOUGLAS NEIGHBOR
Date: 2023.02.04 14:56:30
-06'00'

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Ms. Katie Blount
MS State Historic Preservation Office
MDAH Historic Preservation Division
P.O. Box 571
Jackson, MS 39205-0571

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Ms. Blount:

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

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Sincerely,

**DOUGLAS
NEIGHBOR**

Douglas Neighbor
Superintendent

Digitally signed by
DOUGLAS NEIGHBOR
Date: 2023.02.04
14:52:22 -06'00'

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Governor Bill Anoatubby
The Chickasaw Nation
P.O. Box 1548
Ada, OK 74820

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Governor Anoatubby,

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

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Sincerely,

**DOUGLAS
NEIGHBOR**

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DOUGLAS NEIGHBOR
Date: 2023.02.04 15:05:55
+06'00'

Douglas Neighbor
Superintendent

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Town King Ryan Morrow
Thlopthlocco Tribal Town
P.O. Box 188
Okemah, OK 74859

RE: Multi-Use Trail Project, Natchez Trace Parkway

Dear Honorable Town King Morrow,

The National Park Service (NPS) in cooperation with the Federal Highway Administration (FHWA), are proposing to construct a trail located within the Natchez Trace Parkway boundaries in Hinds and Madison Counties in Mississippi.

The Chisha Foka multi-use trail near Jackson, Mississippi, was originally proposed, analyzed, and approved in the September 1995 Multi-Use Trail Study Environmental Assessment and associated Finding of No Significant Impact. Since 1995, approximately 12 miles of trail have been constructed out of the 16 miles originally envisioned. The current trail alignment terminates at a dead-end in a field without amenities or supporting facilities.

The NPS and FHWA propose to extend the trail by approximately 2.5 miles, beginning at the current southern terminus (milepost 95.9) and ending at the Osburn Stand Information Display parking lot (milepost 93.5). The area of potential effect (APE) is a 40-foot-wide corridor and 2.5 miles long as shown on the attached map. In Fall 2022, the NPS' Southeast Archeological Center conducted a Phase I archeological survey along the proposed route with a survey report forthcoming.

In accordance with §106 of the National Historic Preservation Act of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, we invite you to consult with us regarding the above-referenced undertaking. If you have any questions, please contact Christina Smith, Resource Management Chief, at (662) 840-7560.

Sincerely,

**DOUGLAS
NEIGHBOR**

Douglas Neighbor
Superintendent

Digitally signed by
DOUGLAS NEIGHBOR
Date: 2023.02.04 14:51:28
-06'00'

Enclosures: Project Location Map, Assessment of Effect Form, 1995 Multi-Use Trail EA

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



February 3, 2023

Honorable Chairman Marshall Pierite
Tunica Biloxi Tribe of Louisiana
P.O. Box 1589
Marksville, LA 71351

RE: Multi-Use Trail Project, Natchez Trace Parkway

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Digitally signed by DOUGLAS
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Date: 2023.02.04 14:55:20 -0600

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