

WETLAND STATEMENT OF FINDINGS
FOR THE
DEVELOPMENT OF THE STANFORD PARKING AREA

CUYAHOGA VALLEY NATIONAL PARK

RESPONSE TO COMMENTS

The combination of the Wetland Statement of Findings (WSOF) and this response to comments form the complete and final record for the WSOF. The Park's responses to substantive comments on the WSOF are addressed for those comments that warranted clarification or explanation.

Comment #1

Being that wetlands are being impacted, we can we expect to review the complete Environmental Impact Statement (EIS) or, a minimum, Environmental Assessment documents?

If this qualifies for a CATEX, when do you plan to release those documents?

Park response to Comment #1

In 2012, the Park produced the Boston Mills Area Conceptual Development Plan and Environmental Assessment (EA) which identified parking and circulation issues in the Boston Mills area. The EA was unable to evaluate direct impacts to wetland value and function until the final design stage. Once the design for this project was completed, the Park realized that impacts to wetlands were unavoidable and required to effectively implement this proposed action; therefore, this WSOF was prepared. The EA has been uploaded to the project review website and can be found [here](#).

Comment #2

Property further along Stanford Road should be considered. On top of the hill there is sufficient space without impact to wetlands. Please include this as an alternative.

Park response to Comment #2

The comment is unclear; the Park is not sure which hill the commenter is referencing.

Comment #3

Please provide a plan of how horse trailer parking areas will be enforced and not overwhelmed by passenger vehicles.

This will ultimately create more traffic along Stanford Road. How does this increase impact current residents along Stanford?

Park response to Comment #3

Enforcement of the use of parking areas is outside of the scope of this WSOF and the 2012 EA.

Traffic issues will be negligible.

Comment #4

This study doesn't seem to account for wildlife species, particularly those that are endangered and frequent or live in our park.

How are you to ensure they are not impacted? What species are we to be concerned about? Indiana Bat? Bald Eagles? Salamanders? Snakes?

Those species were given zero consideration in this excuse of a study.

Park response to Comment #4

Impacts to threatened and endangered species, and federally-designated critical habitat, are addressed in the 2012 EA, which has been uploaded to the project review website and can be found [here](#).

Comment #5

Please provide the NEPA documents.

Park response to Comment #5

In 2012, the Park produced the Boston Mills Area Conceptual Development Plan and Environmental Assessment (EA) which identified parking and circulation issues in the Boston Mills area. Many issues (e.g., wetlands and floodplains, threatened and endangered species, historical properties, among others) were identified in the EA, and were either carried through to analysis or removed from further consideration due to some issues not being substantial or could not be comparatively evaluated. The 2012 EA has been uploaded to the project review website and can be found [here](#).

Comment #6

Thank you for your efforts to improve the park system. I consider myself very fortunate to have CVNP so close to my home and work. I think the proposal is well written and I appreciate the effort to perform this study.

I suggest that the project team consider constructing the parking area in the space that is located between wetlands "C" and "D" on Figure 5. This location seems to have less impact on wetlands, and it is closer to the Stanford trail entrance. I expect that visitors will appreciate a parking lot closer to the trail entrance and will be less likely to park along the road with this location.

Park response to Comment #6

The section between Wetlands "C" and "D" (as marked in Figure 5 of the WSOF) is a marginal wetland, although it was not marked as such in the WSOF. Placing the new parking lot in this area would have more impacts to wetlands than locating it in the current proposed location. This area is also directly across from the historic Stanford House. Placing a new parking lot in that location would have a negative impact on the historic district.

Comment #7

We prefer no more parking lots. And it seems there is lots of space at Brandywine.

But if the horse people get their way, we hope the future reclamation project is better than others we have seen. We hope at the very least water permeable pavement is used. And that the reclamation isn't monoculture. All trees is not natural (Wetmore). And all plants, not just trees help fight erosion. There needs to be a variety of native shrubs, flowers, trees and if there is room for field plants.

In the past, it seems that a mass of trees are planted only. And even then, there doesn't seem to be constant care to ensure the work wasn't just a way to check off volunteer hours and to count the number of trees planted. I would like to know the number of trees that survive the first five years.

Again, we want to stress native plants, a variety of kinds of plants with special focus on bird environment since being bird friendly is good to the other plants, insects, bacteria et. al. and us.

Park response to Comment #7

As stated in the WSOF, the streamside areas adjacent to Stanford Run have already been reforested with native trees. However, the understory of the reforested areas remains dominated by invasive plants. Park staff will manage invasive plants in the mitigation area intensively for at least three years beginning in 2024 to transition vegetation from patchy monocultures of non-native species to a mix of native plants. In fall 2025, Park staff will begin reseeding the area with a diverse mix of native wetland plants, including potential use of a short-lived cover crop, such as cereal rye, to provide quick cover.