

# Circulation Environmental Assessment

## Public Scoping Summary Report

CUYAHOGA VALLEY NATIONAL PARK  
AUGUST 2023

### EXECUTIVE SUMMARY

The National Park Service (NPS) initiated a public scoping period for the draft Circulation Environmental Assessment (draft EA) for Cuyahoga Valley National Park (the park). As part of the public scoping period, the NPS solicited input on the draft EA, including the plan's purpose and need for action, impact topics analyzed, proposed alternatives, and the park's consultation and coordination process.

The park issued a press release on June 1, 2023, with information about the draft EA, a link to comment on the project, and information for the virtual public information sessions. The park also provided a *StoryMap Collection* with more information on the Community Access Plan and the Circulation Environmental Assessment at:

<https://storymaps.arcgis.com/collections/5380826b4a9c4828b5172e64f661c501?item=2>. The park encouraged the public to submit comments through the NPS's Planning, Environment, and Public Comment (PEPC) website at: [https://parkplanning.nps.gov/cuva\\_ea](https://parkplanning.nps.gov/cuva_ea). Comments were also accepted by US mail and email.

The public comment period began on June 7, 2023, and ended on July 11, 2023. The park hosted two virtual public meetings on Tuesday, June 13, 2023, at 2 p.m. and 6:30 p.m. (EST) through Microsoft Teams.

The NPS considered all comments from members of the public. A total of 19 pieces of correspondence were received during the public scoping period. This Public Scoping Summary Report summarizes the concerns expressed during the public scoping period.

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## COMMENT ANALYSIS

### DEFINITION OF TERMS

**Correspondence:** A correspondence is the entire document received from a commenter and includes letters, written comment forms, comments entered directly into the PEPC database, emails, and any other written comments provided either by postal mail or in person at the park.

**Comment:** A comment is a portion of text within a correspondence that addresses a single subject such as "parking" or "visitor use and experience." The comment could question the accuracy or adequacy of the information provided in the in the draft EA or present reasonable alternatives other than the proposed actions presented in the draft EA.

**Code:** A code is a grouping centered on a common subject. The codes were developed during the comment analysis process and are used to track major issues. In cases where no comments were received on an issue, the code was not identified or discussed in this report.

**Concern Statement:** Succinct statements that summarize the public's viewpoint and rationale for concern. These statements assist in analyzing overall contexts, meanings, and related issues for the comments received.

**Substantive Comment:** A comment that raises, debates, or questions a point of fact or analysis. More specifically, a comment that questions, with reasonable basis, the accuracy of the information in the NEPA document; questions, with reasonable basis, the adequacy of the environmental analysis; presents reasonable alternatives other than those presented in the NEPA document; or causes changes or revisions in the proposal. These comments require a formal response.

**Non-Substantive Comment:** A comment that merely supports or opposes a proposal or that merely agrees or disagrees with NPS policy. These comments do not require a formal response; however, the park may respond for purposes of clarification.

### COMMENT ANALYSIS METHODOLOGY

The park accepted correspondence by US mail, email, or entered directly into the PEPC system. The park did not receive any letters through the US mail or email; the public submitted all correspondence via the PEPC system. Once the public comment period concluded, each correspondence was read, and specific comments within each unique correspondence were identified. When identifying comments, every attempt was made to capture the full breadth of comments submitted.

To categorize comments, each comment was given a code to identify its general content and to group similar comments. An example of a code developed for this project is *AA3000 – Towpath Trail Rehabilitation*. Once every correspondence was broken into comments, all comments were categorized and summarized with similar comments, and concern statements were created.

## CORRESPONDENCE RECEIVED

The following tables were produced by the NPS PEPC database and provide information about the numbers and types of correspondence received. The tables present data on the number of correspondences received by correspondence type, organization type, state, and country. One table provides information on which organizations commented during the comment period. Also included below is a table detailing the number of comments identified by code. A total of 69 individual comments were derived from the 19 correspondences received.

**TABLE 1. CORRESPONDENCE DISTRIBUTION BY CORRESPONDENCE TYPE**

Correspondence Type	Correspondences
Web Form	19

**TABLE 2. CORRESPONDENCE DISTRIBUTION BY ORGANIZATION TYPE**

Organization Type	Correspondences
Unaffiliated Individual	16
Business	1
Conservation/Preservation	1
Recreational Groups	1

**TABLE 3. CORRESPONDENCE DISTRIBUTION BY ORGANIZATION**

Organization	Comment ID
Cleveland Metroparks (Recreational Group)	12
Old Station Cycle (Business)	4
Summit Metro Parks (Conservation/Preservation)	9

**TABLE 4. CORRESPONDENCE DISTRIBUTION BY COUNTRY**

Country	Correspondences
United States	19

**TABLE 5. CORRESPONDENCE DISTRIBUTION BY STATE**

State	Correspondences
Ohio	18
Pennsylvania	1

TABLE 6. NUMBER OF COMMENTS PER CODE

Code	Number of Comments
Parking	12
New Alternative Actions	7
Ledges – Connector Trails, Boardwalk, Viewing Platform	4
Towpath Trail Rehabilitation	3
Future Planned Actions – Substantive	3
Sagamore Connector Trail	1
Analysis Data and Information	1
Visitor Use and Experience	1
Out of Scope	12
Alternative B (Proposed and Preferred) – Support	8
Alternative B (Proposed and Preferred) – Oppose	8
Non-substantive	6
Future Planned Actions – Non-substantive	2
Alternative A (No Action) – Oppose	1
<b>Total</b>	<b>69</b>

## COMMENT SUMMARIES

### SUBSTANTIVE COMMENTS

#### NEW ALTERNATIVE ACTIONS

##### Valley Trail – Impacts to Seeps

**CONCERN STATEMENT:** Commenters suggested a new action: reroute the Valley Trail between the Buckeye Trail and Riverview Road. Currently, the Valley trail goes through two perennial seeps, and the commenter noted the potential damage to the seeps and impact to visitor safety when visitors attempt to find different routes or informal side trails.

##### *Representative Quotes*

Desperately in need of improvement: The Valley Trail between the Buckeye Trail and Riverview Road, within the CVNP. This section of trail goes through two perineal seeps and a steep uphill section. From the north, an informal side trail to Riverview Road has developed prior to the seeps indicating that hikers are voting with their feet to go over to the road, but there the road is narrow with no berm, so it is a dangerous detour. This is also supposed to be a horse trail, but I've noticed that there aren't any tracks or manure anywhere on the stretch from Brecksville Park to Jaite. Horse riders aren't using this

trail - perhaps because of the nastiness through the seeps and the steep winding ascent from the creek to the road. Or, perhaps because of the lack of a loop back to their horsetrainers. This part of the Valley Trail needs to be re-routed toward Riverview Road to bypass above the seeps and take a better route up the hill! It's outside of the Buckeye Trail, so that trail crew hasn't worked on it, but it is part of a nice loop from Jaite.

## Shuttle and Parking Suggestions

**CONCERN STATEMENT:** One commenter suggested expanding the Wetmore Trailhead parking lot eastward to increase capacity with minimal impacts to historic resources. Another commenter proposed creating an electric shuttle with 20- to 30-minute headways and using the parking lots that are going to be removed or reduced as terminals. The commenter noted that a shuttle could be useful for out-of-town visitors and to reduce congestion.

### *Representative Quotes*

It seems that since the homestead and barns have been removed, perhaps, the Wetmore Trailhead parking lot could be expanded east into the old homestead land to expand capacity with minimal historical impact considerations.

If congestion is a problem at some locations, why not set up a shuttle bus or jitney service using electric vehicles similar to those used at the Columbus Zoo Wilds area. They could use the parking lots slated for removal or reduction as terminals for a loop route or routes through the more popular locations in the park. The vehicles could operate on 20 to 30 minute headways to facilitate convenient access to these locations. I think this would be especially desirable for people coming to the park from out of our area.

## LEDGES – CONNECTOR TRAILS, BOARDWALK, VIEWING PLATFORM

### Impacts to Natural Resources

**CONCERN STATEMENT:** Commenters expressed concerns about how boardwalks and viewing platforms would alter the natural features and beauty of the area. One commenter questioned how the trail around the base of the Ledges would be accessible without changing the natural experience of hiking on the trail. Some commenters acknowledged the importance of having accessible areas but were concerned that the benefits of accessibility would not outweigh changes to the natural environment. One commenter questioned the necessity of the viewing platform and suggested creating an accessible trail with a view of the Ledges Overlook farther back from the edge instead so that the “natural opening and rock formations” would be preserved.

### *Representative Quotes*

Kendall Ledges accessibility trails. I understand and am sympathetic to the desire to make the Kendall Ledges accessible. My best friend and best man at my wedding is confined to a wheelchair and enjoys getting out in the outdoors. From the description in the document, I can't understand the scope envisioned for accessible access. The nature of the trail around the base of the Ledges isn't accessible. To make it accessible would unquestionably change the experience of hiking the trail from a natural

one to one of hiking on a paved path. However, an accessible trail from the Octagon area to the bulletin board at the base of the Ledges with extensions 100-200 yards in each direction may be an appropriate compromise.

I do not support building a wooden boardwalk and viewing platform at the Ledges Overlook.

- Such a structure would have a negative and intrusive impact on the natural features and feeling of this special place.
- A 100-foot wooden boardwalk would be excessive and intrusive in this setting.
- While I understand the importance of accommodating access for people of all mobility levels, I believe the benefits of this proposal do not make up for its negative impacts.
- Unfortunately, as in other National Parks, not all experiences can be available to every person.

Please do not put a boardwalk over the ledges. Again, this is a natural area with natural beauty. It isn't like Brandywine Falls where tourists go. Please keep our cvnp as natural as possible. It is the only wild-ish area in the region, don't turn it into a city park.

Ledges Viewing platform. There isn't much detail on the plans for this. If it is at the present view area, I suppose it is a trade-off on natural situation and making it accessible. Is a platform necessary? Can a trail be made to the view with an area that is accessible, but back 30 yards from the edge that wouldn't need to be a platform while preserving the natural opening and rock formations?

## TOWPATH TRAIL REHABILITATION

### Towpath Resurfacing

**CONCERN STATEMENT:** One commenter expressed concerns about the climate change implications of the resurfacing, noting that asphalt can hold more heat and has a lower albedo than the current surface. One commenter expressed concern that the new trail surface would be less comfortable for runners.

#### *Representative Quotes*

I sincerely hope you abandon plans to pave the tow path in asphalt. As a runner, from a family of runners, I rejoice in the soft crushed limestone surface that covers the majority of the tow path currently. Moreover, runners have very few alternative places to run should the tow path become paved. Lastly, there are considerable environmental concerns associated with pavement, such as the environmental cost of the materials and the warming properties of black asphalt. With climate change upon us, I think we should be doing everything within our power to reduce our dependence on industry and its chemical/synthetic materials and encourage the maintenance of our light-colored path which enhances albedo (reflective properties), thereby mitigating warming. Lastly, paving would severely disrupt tow path use for a long time. Let us keep our unique, soft-surfaced path as is (or even expand it, replacing current pavement!). Pavement would permanently change the character of the path for the worse. I encourage you to reconsider!

## SAGAMORE CONNECTOR TRAIL

### Overcrowding

**CONCERN STATEMENT:** One commenter expressed concern about the Sagamore Connector Trail, stating that connecting two popular routes, the Towpath Trail and the Hike & Bike Trail, would lead to more traffic and overcrowding.

#### *Representative Quote*

The CVNP is justifiably in high demand, simple enough. Falling in the face of that principle, is the plan of action proposing connecting a major user artery (the hike and bike trail) to the national park/tow path doesn't make sense either. The plan to introduce more traffic when impacts of overcrowding are a concern? Again, another waste of money/resources that should be utilized for more parking and spreading out the existing user traffic, not bringing in more traffic.

## NON-SUBSTANTIVE COMMENTS

### PARKING

#### Crow Foot Gulley and Little Meadow Parking

**CONCERN STATEMENT:** Regarding specific proposed parking changes at Crow Foot Gulley and Little Meadow, commenters suggested the park leave existing parking at the two lots to provide access to the Cross Country Trail and the Wetmore Trails from Quick Road. Additionally, commenters suggested the park reconfigure these parking lots to accommodate horse trailer parking for the Wetmore Trail. One commenter suggested converting the parking area to a permeable surface.

#### *Representative Quotes*

I would consider leaving some parking at Crow Foot Gulley or Little Meadow (perhaps permeable surface) to provide access to the Wetmore Trails from the Quick Rd. and access Cross-Country Trail.

Crow Foot Gully and Little Meadow parking lot abandonment. I enjoy the Wetmore, Lange Run, and Butler Trails. Often, the Wetmore Trail parking lot is full. A sign directs people to the Pine Hollow parking lot as an alternative. The Crow Foot Gully and Little Meadow parking lots are adjacent to the Wetmore Trail. Would it be a better alternative to direct folks to one of the them? Especially, if one of them was re-configured to facilitate horse trailer parking? Perhaps, an alternative would be to make one or both of them the recommended horse trail parking lots for the Wetmore Trail.

Consider providing designated on street parking pull offs in select areas to handle overflow parking.

Removal of Little Meadow Parking Lot is fine. But provide a connector trail back to main lot at Pine Hollow.

#### Botzum Parking Lot

**CONCERN STATEMENT:** One commenter suggested keeping the current parking capacity at Botzum parking lot and using the lot to provide additional access to the Cuyahoga River at Bath/Riverview Road. Another commenter noted that the Botzum parking lot is used by the Cuyahoga Valley Scenic Railroad for picking up “elves” for the Polar Express/North Pole Adventure and by Akron Fall Flyer crews. The commenter suggested that the parking lot could serve as a park-and-ride facility for the Cuyahoga Valley



Scenic Railroad and has potential to mitigate congestion while providing access to visitors from the Akron area using the train.

### *Representative Quotes*

Botzum parking lot should stay large. That is the southern entrance to the park. Maybe this could be used as additional access to the Cuyahoga River at Bath/Riverview Road - just a suggestion.

I have some reservations about removing parking spaces at the Botzum trailhead. The lot oftentimes is utilized by CVSR as an additional pickup for train crew. For many years it's been used for picking up elves for Polar Express/North Pole Adventure nightly. Sometimes in the fall, it has been used for Akron Fall Flyer crews as well. Right now, the majority of the train crew boards there since the train is temporarily based out of Peninsula. Aside from train crew, I think Botzum has a lot of potential for the park to re-direct visitors from the Akron-area onto the train as a way to access the park and mitigate congestion. It serves as a great "park and ride"-type facility for CVNP.

### **Trail Suggestions**

**CONCERN STATEMENT:** Commenters had several suggestions for different trail connections and improvements. Suggestions included the following:

- Create a trail along Riverview Road with a connector trail to Buckeye Trail between Jaite and Boston, creating two loops.
- Connect Peninsula to the Hike & Bike Trail by formalizing the old Akron-Peninsula Road right-of-way as a trail. The commenter noted that the right-of-way provides alternative access to Peninsula, the Buckeye Trail, and the North Rim Mountain Bike area.
- Reconnect the Covered Bridge to Oak Hill Road to provide hiking and biking access to Hale Farm, the Hale Farm Connector Trail, and Indigo Lake and to relieve use pressure on the Towpath Trail.
- Revitalize the old Akron-Peninsula Road from Locust Street to Boston Mills by providing access from the Peninsula/Lock 29 area to Boston Mills Road. The commenter explained that an improved connection would provide biking and hiking access to Buckeye Trail, the Bike-N-Hike, Valley Bridle Trail, and the East Rim Mountain Bike Trails.

### *Representative Quotes*

Other suggestions

a. Columbia Road loop trail. A trail along Riverview Road with a connector trail to the Buckeye Trail between Jaite and Boston to form two 4-5-mile loops would be interesting, but a bit of a challenge.

Recommend formalizing the old AP Rd. right of way as a trail that connects Peninsula to the Hike & Bike Trail. This already well-used trail helps achieve the goal of reducing car traffic in the Park. It provides an alternative travel mode for accessing Peninsula, the Buckeye Trail, and the North Rim Mountain Bike area.

Recommend reconnecting the Covered Bridge to Oak Hill Rd. south. This connection provides hiking and biking access to Hale Farm, the Hale Farm Connector trail, and Indigo Lake. This loop achieves the CAP's goal of relieving use pressure on the Towpath.

One thing that I think is missed is the opportunity to provide access from the Village of Peninsula/Lock 29 area to Boston Mills Rd. (near Spicy Lamb Farm) by revitalizing the closed portion of Akron-

Peninsula Rd. from Locust St. to Boston Mills (near Spicy Lamb). This would provide hiking and biking access to the Buckeye Trail, the Bike-N-Hike, Valley Bridle Trail, and the East Rim Mountain Bike Trails. This old road is used regularly by park visitors and is in poor condition and poses safety risks.

## Towpath Resurfacing Questions and Opposition

**CONCERN STATEMENT:** Commenters raised questions about and expressed their opposition to the proposed Towpath resurfacing. Commenters noted that runners prefer the current soft surface. One commenter was concerned about the use of synthetic materials on the Towpath and stated that the pavement would alter the character of the Towpath. Another commenter felt asphalt would be “contrary to preserving its historic form.” The commenter wondered whether erosion concerns were speculative and asked if all parts of the Towpath would be repaved in asphalt.

### *Representative Quotes*

I sincerely hope you abandon plans to pave the tow path in asphalt. As a runner, from a family of runners, I rejoice in the soft crushed limestone surface that covers the majority of the tow path currently. Moreover, runners have very few alternative places to run should the tow path become paved. Lastly, there are considerable environmental concerns associated with pavement, such as the environmental cost of the materials and the warming properties of black asphalt. With climate change upon us, I think we should be doing everything within our power to reduce our dependence on industry and its chemical/synthetic materials and encourage the maintenance of our light-colored path which enhances albedo (reflective properties), thereby mitigating warming. Lastly, paving would severely disrupt tow path use for a long time. Let us keep our unique, soft-surfaced path as is (or even expand it, replacing current pavement!). Pavement would permanently change the character of the path for the worse. I encourage you to reconsider!

Towpath paving. I'm an electrical engineer, not a civil engineer, so I can't evaluate issues regarding exacerbated erosion of the towpath trail surface. It seems pretty durable to me, but I will note that in the Spring, there are sections that retain water and become slightly muddy, and, in the summer, the bikes can kick up dust. It's essentially a road and I tend to avoid it. So, I suppose I side with the runners who prefer a soft surface. By observation and quoted statistics, it is a highly utilized route. If the proposed solution makes it more durable, then there may be merit, but changing to a form of asphalt seems to be contrary to preserving its historic form. How much of "may result in exacerbated erosion" is speculative? Or, does it just make it easier for bikers? In the north, parts are already paved with asphalt. Will these sections be replaced with the proposed asphalt solution?

## FUTURE PLANNED ACTIONS

### Questions about Future Planned Actions

**CONCERN STATEMENT:** One commenter asked if there were future plans for expanding horse camping and allowing primitive camping at the base of the Butler's Trail off of Akron Peninsula Road. A commenter asked about the Northampton Point trailhead for the Cuyahoga River Water Trail and noted that it would be important to provide more access to the trail. Another commenter asked about plans to remove asphalt and replant Stanford Road, similar to efforts on abandoned sections of Everett Road.

### *Representative Quotes*

CVNP camping. I saw no mention of the obvious horse camping area at the base of the Butler's Trail off Akron Peninsula Road. Are there any plans for expanding the use of this area or making it available for primitive camping?

Future project that I did not see in the document is the Northampton Point trailhead for the Cuyhaoga River Water Trail. This is important to provide additional access to the water trail.

Sanford Road. The destruction of the segment of the Boston community off Sanford Road is a decision that was made decades ago and is history. I have seen elsewhere plans for the development of the parking lot with links to the Towpath Trail Connector and the Sanford Trail. Are there plans to remove the asphalt and replant the remainder of Sanford Road in a similar manner that is underway on the abandoned sections of Everett Road?

## **ANALYSIS DATA AND INFORMATION**

### **Map Request**

**CONCERN STATEMENT:** One commenter requested the park include maps in the plan to assist the general public in recognizing specific locations the park plans to enhance. The commenter provided the discussion of the Sagamore Connector Trail in Section 2.2.1 as an example of a section that would benefit from a map.

### *Representative Quote*

It would help me to understand parts of the project if you could include a map as to where certain items are discussed. While these places may be completely understood by people in the park, some of the general public may not know where you are thinking of proceeding. As an example, where is the Sagamore Connector Trail discussed in section 2.2.1? I live in Sagamore hills, ride the towpath extensively, and ride the bike and Hike trail a great deal, and I don't know what connector trail you are referring to. There is a connector from the old carriage trail, going up from the towpath to Houghton rd. to the Bike & Hike trail, but I don't think this is the one to which you are referring. I believe a good presentation should eschew obfuscation, with some maps to help determine exactly where you are discussing enhancements, I believe the general public would be able to give better feedback on this plan.