

National Park Service  
US Department of the Interior



Appalachian National Scenic Trail

**APPALACHIAN NATIONAL SCENIC TRAIL  
THE VIRGINIA TRIPLE CROWN SEGMENT  
VISITOR USE MANAGEMENT PLAN**

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**Public Comment Summary Report**

**January 2024**

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## Acronyms and Abbreviations

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AT	Appalachian National Scenic Trail
NEPA	National Environmental Policy Act
NPS	National Park Service
PEPC	Planning, Environment, and Public Comment
VA	Virginia

# Introduction

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Virginia's Triple Crown segment of the Appalachian National Scenic Trail (AT) is located approximately 15 miles west of Roanoke, Virginia (VA) covering 35.6 AT miles from VA 620 to VA 652. The Triple Crown includes three highly visited scenic overlooks: Tinker Cliffs, McAfee Knob, and Dragons Tooth, which are easily accessible via Interstate 81. Visitation has been increasing at these sites and the crowding levels along this segment of the AT is impacting the visitor experience, social conditions, natural resources, and cultural resources. Currently, high visitor use is causing impacts on facilities in the Triple Crown area, and safety concerns within parking lots and at road crossings.

This comment analysis report provides a summary and response for the substantive public comments received during the public review of the AT Virginia Triple Crown Visitor Use Management Plan. A summary of other, non-substantive comments is also included. On August 1, 2023, the National Park Service (NPS) and cooperative management partners released the draft Visitor Use Management Plan and an associated StoryMap for public review and comment. The NPS notified the public of the draft plan through a press release that was distributed electronically. The press release was posted on the park's website and a link to the NPS Planning, Environment and Public Comment (PEPC) site was posted on social media. Cooperative management partners also shared this information through email distribution lists and social media. The plan materials were available for public review until August 31, 2023. During the comment period, the partners held a virtual public meeting on August 14, 2023, and an in-person public meeting on August 15, 2023. The public was encouraged to submit their comments electronically through the NPS PEPC website. The NPS also accepted public comments in writing (hard copy via mailing) and by email. All hard copy and emailed comments received were transcribed into the PEPC system for analysis.

The interdisciplinary planning team reviewed all public comments. Substantive public comments and responses are included in the Public Comment Summary and Responses section below. The project received many other comments that were not identified as substantive. These are briefly summarized below in the section titled Summary of Additional Public Comments.

## Definition of Terms

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Primary terms used in this document are defined below.

**Correspondence:** A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, or petition. Each piece of correspondence is assigned a unique identification number in the PEPC system.

**Comment:** A comment is a portion of the text within a correspondence that addresses a single subject. It could include information such as an expression of support or opposition to the use of a potential management tool, additional data regarding an existing condition, or suggestions for additional considerations in the impact analysis. Comments were determined to be substantive or non-substantive using Section 4.6, *Circulating Environmental Assessments and Environmental Impact Statements, Soliciting Public Comments, and Responding to Comments*, of the NPS National Environmental Policy Act (NEPA) Handbook as guidance.

**Substantive Comment:** Section 4.6 of the NPS NEPA Handbook defines a substantive comment as a comment that does one or more of the following:

- Question, with reasonable basis, the accuracy of information in materials
- Question, with reasonable basis, the adequacy of the environmental analysis
- Present reasonable alternatives other than those presented in the materials
- Cause changes or revisions in the proposal

In other words, substantive comments raise, debate, or question a point of fact or analysis.

## Public Comment Analysis

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The NPS PEPC database was used to manage the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic. The database produces tallies of the total number of correspondences and comments received, can sort and report comments by a particular topic, and provides demographic information on the source of each correspondence. During the public comment period for the plan, the National Park Service received 29 pieces of correspondence from 4 states (Virginia, West Virginia, Georgia, and Maine). Commenters may list an agency or organization when entering their information and commenting in PEPC. The Virginia Department of Conservation and Recreation, Division of Natural Heritage Resources submitted the only agency letter, all other correspondence on the plan were submitted by unaffiliated individuals.

Comment analysis is a process used to compile and combine similar public comments into a usable format for review and analysis. Comment analysis helps the project team and decision-makers in organizing, clarifying, and addressing technical information pursuant to NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

A coding structure was developed to capture the content of all comments received and to help sort comments into logical groups by topic and issue. The analysis of public comments involved assigning the codes developed in the coding structure to comments received in letters, emails, and PEPC comment entries. All comments were read, reviewed, and analyzed. All substantive comments were summarized by developing concern statements and these concern statements are listed in the following section.

## Public Comment Summary and Responses

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The following public comments informed a change to the plan or require a response.

### VUM Plan: Edits

**Concern Statement:** Commenters suggested the following editorial changes to the Visitor Use Management Plan:

- The following map changes were suggested:
  - Catawba Sustainability Center is state land.
  - Carvin's Cove land owned by the City of Roanoke should be shown as conservation lands.

- Catawba Greenway does not go to McAfee Knob. It provides access to the fire road less than 0.5 mile from Route 311.
- Sawmill Branch Trail should be shown on the maps.

**NPS Response:** Maps have been updated.

## **Issues: Natural Resources Issues**

**Concern Statement:** Commenters stated that there are natural heritage resources including significant communities and rare plants within the Virginia Triple Crown segment. In addition, there is potential for the little brown bat (*Myotis lucifugus*), tri-colored bat (*Perimyotis subflavus*), and northern long-eared bat (*Myotis septentrionalis*) to occur. It was recommended that NPS continue coordination with the U.S. Fish and Wildlife Service and Virginia Department of Wildlife Resources to protect and ensure compliance with protected species legislation.

**NPS Response:** Page 73, Chapter 6 Implementation, Environmental Compliance has been updated to reflect the information.

## **General Comment: Public Comment**

**Concern Statement:** One commenter asked how public comments from March 2022 were considered and/or incorporated into the Visitor Use Management Plan.

**NPS Response:** The National Park Service solicited public comments March 1-31, 2022, and held virtual public meetings on March 9 and March 17, 2022. During the review period, members of the public were welcomed to view plan materials available on the NPS Planning, Environment and Public Comment (PEPC) site. The public comment period was publicized via a press release, social media posts, and the park's website. The National Park Service received 85 pieces of correspondence from 13 states and Canada; feedback from this comment period is represented in the Visitor Use Management Plan. Comments identified issues with overcrowding, trash, the parking lots at McAfee Knob, Dragons Tooth, and Tinker Cliffs and included suggestions for increased/improved visitor education and signage, introducing fees for parking, hiking, and/or shuttle use, implementing a permit system. Commenters also submitted ideas for balancing visitor experiences while conserving resources. The interdisciplinary team considered this input when refining management strategies throughout the remainder of 2022 and early 2023.

## **Summary of Additional Public Comments**

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Members of the public also shared additional concerns and comments on the plan that did not meet the definition of substantive comment. These comments were reviewed by the interdisciplinary team. Some comments offer support or disagree with management strategies found in the plan. Others fall outside the scope of the plan, for example suggesting details that will be helpful during implementation of a specific project. These concerns have been included as a record of the comments received and may serve as a resource for the cooperative management partners as the plan is implemented.

Comments in agreement or disagreement with the management strategies in the plan included the suggestion that fees be charged for parking areas, suggestions on reducing promotion of the trail, suggestions to expand the shuttle system, and suggestions to evaluate the impacts of the shuttle system. Commenters also expressed support and disagreement for a reservation or permit system for trail or

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overnight camping use. Commenters noted safety issues impact local emergency services. Some commenters suggested increased camping site availability, while others asked for decreased camping, and some suggested providing a campground host. A commenter suggested providing overnight parking, and some commenters suggested restricting parking availability. A commenter suggested providing an additional access point to McAfee Knob north of Carvins Cove. Commenters agreed with improvements to the Dragon's Tooth parking area. A commenter suggested relocating the Lambert's Meadow camping. A commenter would like to see opportunities to enjoy solitude, and provision for a range of experiences for different interests and skill levels. Commenters suggested increased funding to support education and enforcement, restroom maintenance, and trash removal. A commenter asked that no restrictions be put on the number of people using the trail, while others stated that the current peak level use is too high.

Commenters provided additional information, which is too detailed to include in the plan, but has been shared with the interdisciplinary team. Suggestions included those on road crossing safety and working with local agencies to increase fines for illegal parking and littering. A commenter noted that during construction of the pedestrian bridge, a separate parking area may be needed, if the current parking lot will be used for construction staging. A commenter suggested blazing the Fire Road. Commenters are interested in implementation details for trails and campgrounds. A commenter requested an inventory of existing resources and recreational resources be completed.

## **ATTACHMENT A**

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### **Public Comment Content Summary Tables**



The following tables were produced from PEPC and provide information on the numbers and types of comments received, as well as demographic information.

**Table 1: Correspondence Count by Correspondence Type**

Type of Correspondence	Number of Correspondences	Percentage
Web Form (PEPC)	18	62.1
Park Form	9	31.0
Email	2	6.9
<b>Total</b>	<b>29</b>	<b>100</b>

**Table 2: Geographic Distribution of Public Comments by State**

State	Number of Correspondences	Percentage
Virginia	24	82.9
Unknown	2	6.9
Georgia	1	3.4
Maine	1	3.4
West Virginia	1	3.4
<b>Total</b>	<b>29</b>	<b>100</b>

**Table 3: Geographic Distribution of Public Comments by Country**

Country	Number of Correspondences	Percentage
United States	29	100
<b>Total</b>	<b>29</b>	<b>100</b>