

Chapter 6

Consultation and Coordination



Photograph Courtesy of: Dr. Chuck Summers

Cumberland Gap Winter Vista

Cumberland Gap National Historical Park
Final General Management Plan/
Environmental Impact Statement

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CHAPTER 6 CONSULTATION AND COORDINATION

PUBLIC INVOLVEMENT

Scoping is an early and open process for determining the scope of a proposed action or project and for identifying issues related to the project. During scoping for this General Management Plan / Environmental Impact Statement, NPS staff provided an overview of the project, including purpose and need and preliminary issues. The public has been involved and was asked to submit comments, concerns, and suggestions relating to the project and preliminary issues. The notice of intent to prepare an environmental impact statement was published in the *Federal Register* on May 29, 2003.

The public had varied avenues by which it participated during development of the plan: participation in public meetings, responses to newsletters, and submitting comments on the park's website by e-mail or letter. Input from the interested public organizations, and local, state, and federal agencies was gathered throughout the planning process. At the beginning of the process, both internal and external input was obtained as part of the scoping process. Input gathered during scoping was used to develop the alternatives and assess and compare the effects of management alternatives.

Internal scoping consisted of initial identification of issues by NPS staff based on what they had encountered with respect to managing park resources and experiences with visitors who have come to enjoy the park. NPS meetings were held at the park during the week of September 22, 2003 to obtain the park's initial input into the process.

The external scoping process provided early identification of concerns, issues, expectations, and values of existing and potential visitors, neighbors, cooperating associations, partners, scientists, scholars, and other government agencies. Public scoping meetings were advertised during May and June of 2004. A newsletter describing the General Management Plan / Environmental Impact Statement process was prepared and distributed in June 2004 that also announced the public meeting schedule. Also, a scoping letter was mailed to local, state, and federal agency representatives, tribal representatives, and the public in August 2004 (Appendix J). The scoping letter contained information on the function of a general management plan, statements of the park purpose and significance, information on the planning team and the process for planning, and methods available to the public for communicating with the team and participating in the planning effort.

The public was invited to voice issues and suggest ideas for the future of the park at three public scoping meetings held on August 10, 11, and 12, 2004 at the park and nearby venues. Press releases were issued prior to the public meetings, and comment cards and Internet addresses were provided for public use. Also, meetings were held with stakeholders during August and September 2004. These stakeholders included representatives from federal, state and local agencies, local governments, and educational institutions in the region, environmental interest groups, recreation user groups, historical societies and tourism groups. Information regarding the general management planning process was provided at the visitor center and park staff provided information to visitors regarding how to comment as well. Overall, the public scoping comment period was open for 30 days, and 12 meetings were held with the interested public and stakeholders to obtain public comment on the process. Over 500 comments were received during scoping. More than 30 percent of the comments related to education, outreach, and partnering, and nearly 25 percent of the comments were related to access issues. Trails and economic issues each encompassed approximately 10 percent of the comments. Fern Lake, special events, and other issues comprised the remaining comment topics.

A second newsletter was prepared and distributed in October 2005 that described how the management alternatives were developed based on agency and public input, and announced public meetings that were held in November, 2005. The alternatives were presented to the interested public

during four meetings held at the park on November 29 and 30, 2005. Press releases were issued prior to the public meetings, comment forms were provided and the public was notified how to comment via the Internet. Many of the public's comments at the meetings were directed at the potential use of Fern Lake and access to Hensley Settlement.

A third newsletter was issued in May, 2009 that provided an update on the plan, and described the alternatives that would be presented in the Draft General Management Plan / Environmental Impact Statement. The newsletter also identified that the next step in the process was issuance of the draft plan, and that public meetings for the draft plan would be announced.

A fourth newsletter was issued in November 2009 to announce the release of the Draft General Management Plan / Environmental Impact Statement and identify the date and location of public meetings. This newsletter notified the public how to comment via mail, Internet or in person. All newsletters are available online, as are other documents related to this planning effort.

The final three public meetings were held on December 8 and 9, 2009 at the visitor center. At each meeting, the superintendent, Mark Woods, and David Libman, from the Southeast Regional Office, gave brief summaries of the history and status of the General Management Plan, followed by a question and answer period. The remaining time was spent in an open house in which planning team members discussed the project with meeting attendees using posters that summarized the features of each alternative. Comment sheets were made available, and some comments were collected at the meeting.

The General Management Plan / Environmental Impact Statement is posted on the Internet at: <http://parkplanning.nps.gov/document.cfm?parkID=370&projectId=13830&documentID=30052>.

CONSULTATION WITH OTHER AGENCIES/OFFICIALS AND ORGANIZATIONS

In addition to the consultation described above, additional consultation with agencies was conducted prior to completing the 2009 Draft General Management Plan / Environmental Impact Statement. Agency coordination letters are included in Appendix J.

In accordance with 36 CFR 800 and the Programmatic Agreement between the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers and the NPS, a letter was sent to the Virginia, Tennessee and Kentucky State Historic Preservation Officers and to the Advisory Council on Historic Preservation to initiate consultation (see Appendix F). The letters invited them to participate in the planning process and informed them that the NPS plans to use this environmental impact statement to fulfill the requirements of Section 106 of the National Historic Preservation Act as well as comply with provisions of the National Environmental Policy Act.

The NPS consulted with the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Offices under the terms of the Nationwide Programmatic Agreement for Section 106 compliance. Based on this consultation, the NPS determined what actions are programmatic exclusions, and for all other undertakings what actions would be required for review and comment under 36 Code of Federal Regulations 800. Letters were received from the three State Historic Preservation Offices and copies are included after the comments and response section.

During preparation of the Final General Management Plan, and in response to comments, the NPS also conducted additional coordination with the Virginia State Historic Preservation Officer. It was agreed that all Section 106 impacts would be changed to state that there would be a potential for adverse effects on cultural resources, because specific project designs are not yet available. Because specific future project designs are not yet available, a final conclusion regarding effects cannot be made, and a more conservative approach was taken in the General Management Plan for describing

effects on Section 106 resources. When specific projects are proposed that have a potential to affect cultural resources, they will undergo a full compliance review, to include Section 106 and National Environmental Policy Act assessments. These assessments will be tiered to information in the General Management Plan / Environmental Impact Statement. A similar response was provided to the Tennessee State Historic Preservation Officer.

In accordance with Section 7 of the Endangered Species Act (16 U.S.C. 1531 et seq.), the NPS contacted the U.S. Fish and Wildlife Service by letter to initiate consultation (see Appendix F) and to provide a list of threatened and endangered species, critical habitats, and species of concern. The U.S. Fish and Wildlife Service reviewed the Draft document and indicated that their primary concern was the continued protection and conservation of listed species, specifically *Blackside Dace* and *Indiana Bat*, and had no further substantive comments. The three state natural resources agencies were also contacted to provide a list of threatened and endangered species. Consultation letters were also sent to the Environmental Protection Agency, Region 4. A list of agencies contacted is provided in Appendix J. In addition, letters were sent in October, 2004 to Federally-recognized American Indian Tribes with ancestral lands in Tennessee, Virginia and Kentucky requesting feedback concerning the General Management Plan. These letters were followed up with individual phone calls and a subsequent letter identifying the purpose and need of the project and requesting input. A copy of this letter request and the list of American Indian Tribes contacted are included in Appendix K.

COMMENTS ON, CHANGES TO, AND RESPONSES TO COMMENTS ON THE DRAFT GENERAL MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT

Availability of the Draft General Management Plan / Environmental Impact Statement

The Draft General Management Plan / Environmental Impact Statement was made available for public review from October, 14, 2009 through January 4, 2010. Public meetings were held on December 8 and 9, 2009. Public comment was solicited during the public meetings; electronic and hardcopy comments were collected during the public comment period of January, 2010. Media and public service announcements were sent to local and regional newspapers and magazines, radio and television stations, and notices were posted at park units and park headquarters (see Appendix K for listing) in advance of the public meetings. Copies of the document were distributed by mail (both hard copies and CDs), as well as provided at park headquarters, posted on the Internet, and local libraries.

Comments on the Draft General Management Plan / Environmental Impact Statement were invited by all means and received in several different formats, including comment cards, public meeting transcripts from public meetings, letters, e-mail, and postings on the NPS Planning, Environment and Public Comment website. Comment sheets were handed out at public meetings, stakeholder meetings, and from park headquarters. A total of eight individuals entered comments on the NPS Planning, Environment and Public Comment website. All comments received are considered part of the administrative record.

Changes to the General Management Plan / Environmental Impact Statement

Changes made to the General Management Plan / Environmental Impact Statement as a result of public comments include the following:

- Table 2 and the text of the plan was changed to include reference to the requirement of the Surface Mining Control and Reclamation Act of 1977.
- Table 9 in Chapter 2 was changed to reflect the coordination with the Virginia State Historic Preservation Officer regarding potential adverse effects on Section 106 resources. Changes were

also made in the cultural resources section of Chapter 4 to respond to this same comment, and also summarized in Chapter 2 and the Executive Summary.

- Other minor changes were made to the document to edit for consistency.

Responses to Comments on the Draft Plan

Letters and Web comments received from agencies are reprinted in full in the pages that follow this summary of comments and responses. Substantive comments are highlighted in the body of each letter, and a response to the comment is provided on the page beside the copy of the letter. Agency letters were received from the Tennessee and Virginia State Historic Preservation Offices, U.S. Fish and Wildlife Service, Tennessee Division of Forestry, and the U.S. Environmental Protection Agency.

Other substantive comments from individuals and organizations are paraphrased or reprinted in their entirety, and NPS responses are provided in the pages that follow. Comments are considered substantive if they:

- Question, with reasonable basis, the accuracy of information in the Environmental Impact Statement
- Question, with reasonable basis, the adequacy of the environmental analysis
- Suggest different viable alternatives
- Cause changes or revisions in the proposal

Comments in favor of or against the preferred or other alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive. NPS has responded to comments in order to clarify policy, position, or procedure.

All comments received were reviewed, grouped by topic and responses were developed. Comments were either taken directly from the author or paraphrased to reflect the similar nature of comments received. Each of these comments is followed by a NPS response and presented in the pages that follow.

Access and Visitor Experience

Comment: No expansion should be done to the park campground as described in alternatives B and C. The lack of electrical hookups in NPS campgrounds in general makes them one of the few refugees from the huge noisy RV's that make commercial campgrounds so unappealing. Power should not be installed in Loop D. Also, horse facilities cannot be added to the campground. The noise and smell from horses will destroy the calm and quiet that make your campground so enjoyable. Leave the RV and horse business to the commercial campgrounds, they more likely need the business.

Response: Electrical hookups are currently available at the park's Wilderness Campground. Providing electricity reduces the need for RV owners to run generators, thereby reducing noise levels. Provision for minimal (2) spaces for horse trailers was provided in response to visitor desires expressed during the planning process. The impact from these limited two horse trailer parking facilities on natural resources would be considered to be long- and short-term, minor and adverse.

Comment: We support establishing a satellite van parking area at Shillalah Creek and improvement of the Shillalah Creek Road, but do not feel a paved parking area is appropriate on the west side of Hensley. Providing vehicle access to Hensley Settlement to an unlimited number of visitors that may prefer it, should not be viewed as a part of the NPS's mission. The atmosphere of remoteness for the Hensley Settlement is

critical to the visitor's appreciation of the culture and historic significance associated with it. An excess of vehicles and visitors will destroy this.

Response: Access to Hensley was one of the most common comments raised during public scoping. In the case of the Hensley Settlement, a sense of isolation and feeling of an earlier time are important parts of the visitor experience. The NPS believes these values can be retained while still providing easier access.

Connectivity

Comment: As we contemplate the future of the Park for the next 15 to 20 years, it is an unfortunate geographic reality that there is no safe and convenient access to the Park Visitor Center in Middlesboro KY for pedestrians or bicyclists from Cumberland Gap TN. I believe it is important to note this as a deficiency in the current and proposed management plans and stress that it should be placed on an agenda for a time in the future when the economic climate of the country improves and funding for such development is available. . . I would like to see a pedestrian tunnel/greenway connecting Cumberland Gap TN and Middlesboro KY in my lifetime.

Response: There is no easy or inexpensive way to connect the Town of Cumberland Gap with the Park Visitors Center. Another tunnel for pedestrians and bikers is highly unlikely because of cost and impacts. Therefore, given the geographic, cost, topographic and environmental impact challenges – the likelihood of such a connection is not within the realm of reasonable funding foreseen at this time. Alternative C was selected as the Preferred Alternative as being the most cost effective.

Partnerships and Interpretation

Comment: Contract (or otherwise) with LMU, and its Museum, to enhance the area's Civil War Story and the role President Lincoln played, specifically, in helping this region, through the founding of a University for its citizens, which ultimately bore his name.

Response: The park and NPS are open to mutually beneficially private/public partnerships and would welcome discussions with potential partners. In addition, these types of interpretive activities are addressed in a separate Long-Range Interpretation Plan for the park (see Chapter 5).

Comment: Work with the Eastern Band of Cherokee Indians in North Carolina, to develop an interactive program telling of the importance of the Gap as "Warriors Path" and its intertribal use as a passage for Shawnee, Cherokee and others prior to and after Euro American appearance. Use enhanced, interactive interpretation programs to highlight the personal experiences of the customs and living history of these "first Americans". This will add a significant dimension to visitor attraction, and develop a stronger bond for such relationships with the American Tribes, NPS, and the public, with little operating overhead.

Response: These types of interpretive activities will be addressed in a separate, Long-Range Interpretation Plan for the park.

Comment: To that end, the National Heritage Area requests that it be considered as a primary partner for future interpretive and preservation needs for the park's significant Civil War-era resources. Cumberland Gap was a very significant place to both Federal and Confederate commanders in the war's early strategic thinking. It became a place of conflict during the war, and it possesses significant resources from which those stories can be told.

Response: The NPS and the park appreciate the interest of Middle Tennessee State University Center for Historical Preservation in the park's Civil War Resources, and welcome the opportunity to establish partnerships that further our mutual goals and objectives.

Comment: Build an outdoor classroom, Offer Professional Dev. for local teachers, acquaint them with the park and services offered at CGNHP, this would enable local teachers to better utilize the park. Partner with local Biology/Science students at local colleges Walter State, LMU, Southeast Community College, utilize them for wild flower identification, tree identification, water exploration, identification of living organisms, bird sanctuary (areas for viewing birds and butterflies)

Response: The park has an extensive education/outreach program and would continue to provide these services in the future. These types of programs will addressed in a separate Long-Range Interpretation Plan for the park (see Chapter 5).

Facilities

Comment: Throughout the draft document proposed developments are not detailed. Much additional information should be provided on any development being considered within the next 15 to 20 years.

Response: The detailed plans for site specific projects would occur during the implementation phase with opportunity for public input. general management plans provide guidance on desired future conditions and visitor experiences.

Comment: Horse facilities should not be added to the campground.

Response: Provision for minimal (2) spaces for horse trailers was provided in response to visitor desires identified during the planning process. The impact from these limited two horse trailer parking facilities would be considered negligible or minor.

Comment: Further development in the park should preclude overnight facilities, for example, and should also not include commercial activities that might compete with private enterprises located around the park.

Response: Commercial services would be addressed under authorization from the park via an incidental business permit. Each application is reviewed on its own merit, in compliance with all requirements, on a case-by-case basis.

Trails

Comment: Plans for the development of more trails between the Wilderness Road Campground and Cumberland Gap should also be a part of this GMP.

Response: The purpose and scope of a General Management Plan is to address a long range management approach for the park, but does not include specific locations or designs for future trails. Future specific developments involving trails will be consistent with park purpose, law, policy, and regulations, and will be provided during the implementation phase of planning. This will include environmental compliance documentation and public input.

Comment: Cumberland Gap could become the place where the Pine Mountain (KY) and Cumberland (TN) trails meet, and thus will become a critical resource for long distance hiking in the region. The joining of these two trails in the park will enhance Cumberland Gap's legacy as a critical link in transportation across and through the Cumberlands. Since both of these trails are being built by hikers for hikers, it will be critical for the park to prohibit their use by mountain bikes, horses and vehicles in the park.

Response: The purpose and scope of a general management plan is to address a long range management approach for the park, but does not include specific locations or designs for future trails. Future specific developments involving trails will be consistent with park purpose, law, policy, and

regulations, and will be provided during the implementation phase of planning. This will include environmental compliance documentation and opportunities for public input.

Comment: Maintenance, signage, promotion and patrol of the existing Cumberland Trail in the park need to be addressed. The route of the Cumberland Trail through the park should be designated in the final GMP.

Response: These areas are managed and patrolled by the park to the extent practicable. The Cumberland Trail and other trails are identified on the alternatives Figures 6, 7, and 8. Note response above regarding specific location of trails.

Comment: Routing, construction, maintenance, and patrol of the Pine Mountain Trail in the park also need to be addressed. A route entering the park at the visitor center or Sugar Run, extending through Cumberland Gap and then joining the Cumberland Trail at the Tristate Marker should be designated as part of the final GMP.

Response: The Cumberland Trail is identified on the alternatives figures. The Cumberland Trail transitions onto the Ridge Trail north of Cumberland Gap. Pine Mountain Trail connectivity in the park is in planning and the future connection is shown on alternatives Figures 6, 7, and 8. Note response above regarding specific location of trails.

Comment: Significant work needs to be done to secure trails in the Brownies Creek area of the northeastern corner of the park. These trails are used by ATVs that must be banned from all trails in the park.

Response: All Terrain Vehicle use is not allowed in the park. The park manages the Brownie's Creek Trail on a cooperative basis with the Kentucky Division of Water and the Kentucky Department of Fish and Wildlife Resources, because of the common border in this area of the park. All Terrain Vehicle use is also banned in the state-managed areas just outside the park in this area. The NPS will continue to coordinate with the State of Kentucky to enforce the prohibition of All Terrain Vehicles in the park and adjacent State lands.

Bicycle Trails

Comment: Our recreational use of the Park includes day hiking and bicycling. We are avid bicyclists and the increased opportunities for developing additional trails and bicycle access in the Park under Alternative C are especially appealing. However, it is my hope that the proposed changes outlined in Alternative C be interpreted as an essential first step toward enhanced opportunities for bicycling in the Park rather than the last step to satisfy an increasingly important recreational constituency.

Response: Opportunities for bicycling consistent with the park's purpose, law and policy and that do not impair park resources will be considered.

Comment: Bicyclists are a diverse constituency group and it is difficult to accommodate their varied interests under a "one-size fits all" management plan that appeals to the lowest common denominator. It is my hope that a matrix of management plans can be developed to accommodate and appeal to the different styles or disciplines of bicycle activities occurring in the Park.

Response: The General Management Plan establishes fundamental resources and values as well as desired future resource conditions and visitor experiences. Subsequent implementation plans will address specific facilities, activities, designs and locations.

Comment: Currently the conditions in the Park are very supportive to the needs of the “Road biking” user group but improvements in signage and bicycle awareness for automobile drivers are certainly warranted. The proposed extension of NPS authority along the Sugar Run Road following the periphery of the Park boundary will significantly enhance the visitor experience of this user group, but also require additional NPS attention to mitigate potential conflicts between automobile driving visitors and bicyclists.

Response: Road biking is allowed on this road and all other roads in the park. The NPS owns the road to Sugar Run (Highway 988) and is responsible for maintenance, safety and enforcement of this and all other roads in the park. This road has a 25 mph speed limit to maintain safe conditions. There has only been one bicycle related accident reported in the park in the last 13 years. The park therefore does not plan on installing additional signs along the Sugar Run Road at this time. Information concerning bicycle safety and bicycle use in the park will be placed on the park web page to provide additional information for visitors.

Comment: I would like to suggest that all gravel utility roads in the vicinity of the Wilderness Road Campground be open to bicyclists. This would include the portion of the gravel service road connecting the campground with the terminus of the Gibson Gap trail at Virginia Hwy 58. Appropriate signage and user education efforts would be instrumental in mitigating potential user conflicts between bicyclists and horseback riders. The upper portion of the Gibson Gap trail where it becomes a single track would remain closed to bicyclists with a well placed sign and barrier if required. Opening this limited portion of “developed” wilderness zone would facilitate a natural experience for bicyclists without compromising the integrity of the Park’s commitment to preserving the natural backdrop to Cumberland Gap.

Response: Use of bicycles is currently allowed on roads in the vicinity of the campground, including Tiprell Road, Colson Trail, Boone Trail (Old Highway 58), and all other roads in the park. Bicycles are not allowed in the recommended wilderness in accordance with provisions of the Wilderness Act. Bicycle use of the tunnel is not allowed, but the park does arrange to have bicycles transferred through the tunnel for safe passage. The NPS will continue to monitor safety along all park roads and trails. Note responses above regarding signage and posting information on the park’s website. In addition, the park will post information regarding bicycle use, other opportunities for recreation, and safe park visits.

Comment: Currently this group of [mountain bike] users has very limited access to Park resources. The development of the new management plan under Alternative C has the potential to provide this constituency group with greater access. . . Potential areas designated for Mountain bike activity could be developed on the Lincoln Memorial University side of the Park, and in the area surrounding Fern Lake once it becomes an NPS administered unit.

Response: NPS Management Policies 2006 (Section 9.2.2.4) states that the designation of bicycle routes is allowed in developed areas and in special use zones based on a written determination that such use is (1) consistent with the protection of a park’s natural, cultural, scenic, and esthetic values; (2) consistent with safety considerations; (3) consistent with management objectives; and (4) will not disturb wildlife or other park resources. A similar determination may be made to designate routes outside developed areas and special use zones; however, the designation must be made by promulgating a special regulation (as specified in 36 CFR 4.30).

Zoning, Alternatives and Impacts Associated with Individual Facilities

Comment: The footprint of the proposed developed areas be kept as small as possible, and all developments be consistent with historic park activities, with the exception of new facilities in the Fern Lake area.

Response: Subsequent implementation plans will address site-specific facilities, locations, activities and designs. The approval of a general management plan does not guarantee that funding and staffing

needed to implement the plan will be forthcoming. Future plans will incorporate sustainable practices, and as mentioned in the plan, will be consistent within the concept of the site-specific conditions) such as the sensitivity to the Historic Districts). Site-specific, future plans will be consistent with park purpose, law, policy and be sustainable. Proposed actions will include environmental compliance documentation and opportunities for public input.

Fern Lake

Comment: Development at Fern Lake should be limited to day use, with an emphasis on environmental education facilities, such as an interpretive trail around the lakes shore. No residences should be constructed or maintained, unless used solely by NPS personnel.

Response: Park hours are anticipated to remain as daylight hours, with continued operation of overnight camping at designated campsites. No residences will be constructed within the park.

Comment: I feel there needs to be a cooperative effort with Bell County and the NPS to make an entrance to the Fern Lake Watershed Acquisition to give greater access to the Park. My vision is a parking area similar the recent Chadwell Gap Trailhead. This could be easily developed with minimum cost. The area most suited for this access is a good Middlesboro City Street (Balmoral) that deadends behind Miller's Chapel Baptist Church. From there an old logging road winds through Parker Gap with gorgeous views of Fern Lake. A walking trail around Fern Lake and connecting to the Fitness Trail at Park Headquarters would be a great asset with minimum investment.

Response: The specific location and design of facilities at Fern Lake will be determined in future planning after acquisition is complete and with public input. Site-specific future plans will be consistent with park purpose, law and policy and be sustainable. Proposed actions will include environmental compliance documentation and opportunities for public involvement.

Comment: We believe that the Fern Lake watershed may need a separate designation as a Special Resource Zone, perhaps as a subset of the Natural Zone. (S) The watershed is unique in this region where many streams have been damaged by mining and other land disturbances. Yellow Creek acts as a "reference stream" for the region protecting a federally endangered fish. The subsurface transmission of water under a head of pressure to the alluvium of the lake creates a natural system that the park should preserve and interpret to the public. In fact, the entire story of the collaborative effort to protect this important "ecosystem service" should be interpreted as a natural counterpoint to the historic story of the Gap. Visitors to Middlesboro, KY will be able to enjoy water from the park that the City helped to protect. Visitors to the watershed will understand its unique ecological and geological functioning and the behaviors necessary to protect it. The educational opportunity for future publics is immense.

Response: The park currently includes Fern Lake as part of their interpretive programs for visitors and students (who visit the lake on park-sponsored field trips), and will continue to do so in the future. Interpretive activities include discussions of the use of Fern Lake as a water supply and importance of watershed functions and protection of this sensitive area. The majority of the Fern Lake watershed has been classified as a Natural Zone, which is designed to provide a high level of protection. Therefore, another zone designation is not believed to be necessary.

A small portion of the Fern Lake watershed is defined as a Developed Zone. However, only a site-specific action would be appropriate. In other words, it does not mean that the entire zone would be "developed". In addition, National Environmental Policy Act and Section 106 National Historic Preservation Act compliance assessments would also be required for any proposed new facilities.

Comment: We prefer that the footprint of the proposed developed areas be kept as small as possible, and that these developments be consistent with historic park activities, with the exception of new facilities in the

Fern Lake area. Throughout the draft document proposed developments are not detailed. Further development in the park should preclude overnight facilities, for example, and should also not include commercial activities that might compete with private enterprises located around the park.

Response: New facilities would only occupy a small portion of the Developed Zone. Each new facility would also be required to undergo a full compliance assessment according to the requirement of the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. Only facilities that are determined to be necessary and appropriate by the NPS would be proposed in accordance with the park purpose, law and policies (see also previous responses regarding development within appropriate context).

Commercial services are not currently offered in the park, and any new services, if applicable, would be obtained under the requirements of the Concessions Policy Act. Overnight concessions are not currently planned for the park. Each application for an incidental business permit will be reviewed on its own merit, in compliance with all requirements, on a case-by-case basis.

Cultural Resources

Comment: The Commonwealth of Kentucky as part of a settlement agreement (United States of America, Department of Interior, NPS, Et Al. v. Natural Resources and Environmental Protection Cabinet and Appolo Fuels, Inc., PDH-23646-039 and PDH-23650-39, Permit No. 807-0263) established a process of early notification and analysis that applies to any surface mining permit applications that might adversely affect the viewshed of the park. This process applies to any permit application within 5 miles of the park or to any application where any person or entity asserts that the proposed mining operation will adversely affect the park. If the Cabinet determines that there would be an adverse effect, the state provision that mirrors section 522 (e)(3) of the Surface Mining Control and Reclamation Act of 1977 would apply. The federal statute states, in part, that no operations “shall be permitted which will adversely affect (the park) unless jointly approved by the regulatory authority and the Federal agency with jurisdiction over the park”. Implementation of this important authority to affect the cultural landscape beyond park boundaries should be discussed in the GMP.

Response: This requirement has been added to Chapter 2, Special Mandates and Policies, as well as Table 2.

Tourism

Comment: Recreate the wagon path from the Wilderness Road alignment in Lee County, Virginia, through the Gap to a wagon Camp on the other side. A concessionaire operation here would seem ideal and various trip styles and lengths could be offered for visitors, with price considerations for the length and type of trips offered. Child oriented trips, trips with chuck wagon meal service; evening trips with campfire sing-a-longs, etc. are possibilities.

Response: During the development of alternatives such ideas were discussed and are open to further consideration during implementation, such as special events and commemorations. In addition, commercial services in the park are addressed under the Concessions Policy Act, via incidental business applications. Each application is reviewed on its own merit, in compliance with all requirements, on a case-by-case basis.

Comment: Re-creation of 1850-60 Town of Cumberland Gap, Tennessee, along with a “Skagway, Alaska” type of business/residential street with concession operated stores/restaurants, jail, etc. Other time-period representations could be alternates.

Response: This area outside the park is not within the scope of this General Management Plan. Proposals for any type of historic recreations in the town of Cumberland Gap are outside the authority of the NPS.

Comment: New Visitor Center/Museum in the Town of Cumberland Gap to be staffed primarily by townspeople with NPS management and oversight to complement the Iron Furnace restoration and to illustrate the various changes in the town transition over time from the Civil War period, trails to highways evolution, influence of English monies invested in minerals extraction, the evolution of Lincoln Memorial University, etc.

Response: The NPS is not authorized to manage or have oversight of a visitor center for the Town of Cumberland Gap that is not owned by the NPS. The NPS does provide information at our existing visitor center regarding Cumberland Gap and area attractions.

Comment: Reopening to the public of Cudjo's Cave as a real attraction suggested to be done by concessionaire. This was successfully done from the 1930's thru 1980's. It provides an excellent underground experience. Gravel pathways remain to accommodate visitors and with the return of highlight style lighting and little other maintenance, some breathtaking scenery is there to enjoy. . . The potential is here to add to the daily tourism base whereas under current operation, it is by appointment only and shown only with lantern or flashlight.

Response: The NPS provides scheduled, guided tours of the cave that are designed and managed to protect sensitive cave resources. Limited visitation is necessary to preserve cave resources for future generations. Allowing open visitation would cause unacceptable resource impacts.

Comment: Highlight the railroad history of the Gap area, along with a convenient off-site treatment of the history of the Highway Tunnel Project.

Response: Types of interpretive activities are to be addressed in a separate Long Range Interpretation Plan for the park.

Comment: A principle missing link in the ability to package and market the areas tourism future, as well defined in the recent Gateway tourism analysis previously covered, is the lack of quality hotel/motel facilities which could accommodate longer term family vacations. Only a few scattered, motel-type facilities exist at all. One major way of resolving this critical issue has been judged to be enticing private investment to build larger capacity, high quality, full-service resort facilities. These resorts would prepare for its guests, based on their plans, schedules of trips, visits to attractions, specialized activities for spelunking, skydiving, bicycling, etc. based on the requests of future visitors. Personal guides could also be arranged, when desired. With quality resort services leading the way, more shorter-stay facilities for the area would be built.

With the onset of this Master Plan update, the NPS can take the lead in securing this missing link. It should consider a type of concession approach creating a public/private partnership such as previously done in some western parks and elsewhere. Here, a site in a development area of the Park such as Fern Lake would be provided to the potential developer as the incentive to lure private venture capital to invest in construction of the resort facilities.

Response: Due to the sensitive nature of the watershed and drinking water supply of Fern Lake, this area is not an appropriate location for such development (see also the previous responses regarding concession policies).

Interpretation

Comment: We also note that enhanced recreational and educational opportunities for the park from the Cumberland Gap, Tennessee, side would be important. The iron furnace site in Cumberland Gap, Tennessee, has been significantly improved in the past decade. However, the linkage between that site and the Civil War experiences of the region also could be enhanced.

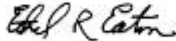
Response: The Iron Furnace pre-dates the Civil War and is but one of many similar resources in the park. The park interprets Civil War history at the visitor center, and will continue to do so by providing wayside exhibits accessible by trail in the future. The wayside exhibits may be similar to the commissary site. The park also partners with Lincoln Memorial University, the National Cemetery in Knoxville (in 1863, approximately 500 civil wars graves were moved from land adjacent to the Daniel Boone Interpretive Center to the Knoxville National Cemetery) and the Mills Spring Battlefield regarding interpretation of Civil War history. Interpretation of the Civil War is also conducted as part of periodic cultural heritage events. For example, the last event attracted over 10,000 people, including over 1,000 school children, and focused on the Civil War.

Comment: Twenty years ago, the Middle Tennessee State University Center for Historic Preservation worked with Cumberland Gap, TN, officials and property owners to create the existing historic district in the town. Through effective partnerships, it also can be a powerful partner for enhancing the turn-of-the-century industrial history story of the park.



Response: The park currently partners with the Town of Cumberland Gap to address historic features of the town, including the Iron Furnace. Under the preferred alternative (C) the level of formal partnering will increase.



| Comments | Responses |
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| <div data-bbox="575 217 680 318" data-label="Image"> </div> <div data-bbox="420 337 833 365" data-label="Section-Header"> <p>COMMONWEALTH of VIRGINIA</p> </div> <div data-bbox="476 378 783 402" data-label="Section-Header"> <p>Department of Historic Resources</p> </div> <div data-bbox="249 402 407 433" data-label="Text"> <p>I. Prudence Bryant, Jr. Secretary of Natural Resources</p> </div> <div data-bbox="453 402 806 425" data-label="Text"> <p>2801 Kensington Avenue, Richmond, Virginia 23221</p> </div> <div data-bbox="905 402 1020 430" data-label="Text"> <p>Kathleen S. Kilpatrick Director</p> </div> <div data-bbox="905 440 1020 500" data-label="Text"> <p>Tel: (804) 367-2323 Fax: (804) 367-2391 TDD: (804) 367-2390 www.dhr.virginia.gov</p> </div> <div data-bbox="315 498 445 521" data-label="Text"> <p>January 12, 2010</p> </div> <div data-bbox="315 557 613 680" data-label="Text"> <p>Mark H. Woods, Superintendent National Park Service Cumberland Gap National Historical Park US 25E South P. O. Box 1848 Middlesboro, KY 40965-1848</p> </div> <div data-bbox="315 696 831 779" data-label="Text"> <p>Re: Draft General Management Plan/Environmental Impact Statement Cumberland Gap National Historical Park Lee County, Virginia DHR File No. 2004-1271</p> </div> <div data-bbox="315 797 447 820" data-label="Text"> <p>Dear Mr. Woods:</p> </div> <div data-bbox="315 836 980 980" data-label="Text"> <p>Thank you for requesting our comments on the draft General Management Plan prepared for the Cumberland Gap. We fully support the National Park Service's selection of Alternative C as the park's preferred alternative. Alternative C best fits the park's mission of interpretation and education by providing additional opportunities for visitor access. Alternative C also includes provision for public private partnership for better preservation of the park's irreplaceable historic properties as well as better contributing to heritage tourism and the economic development of the area.</p> </div> <div data-bbox="315 995 980 1200" data-label="Text"> <p>We also agree that other more detailed studies and plans are highly desirable and will be needed for implementation of specific actions to achieve the desired outcomes presented in the General Management Plan. We are very willing to work with the park as it conducted the following studies outlined in Chapter 5 of the GMP. These include development of a Resource Stewardship Strategy, Cultural Landscape Inventory needed for the Hensley Settlement, Cumberland Gap Historic District, and any other identified cultural landscapes located within the park, a Cultural Landscape Report for all identified cultural landscapes, Historic Structure Reports, Historic Structures Preservation Guides for Hensley Settlement, Cultural Resource Surveys, a Baseline Inventory of Cultural Resources in Gap Cave, an Archeological Overview and Assessment, a Collections Management</p> </div> <div data-bbox="247 1211 371 1281" data-label="Text"> <p>Administrative Services 10 Courthouse Ave. Petersburg, VA 23803 Tel: (804) 862-6416 Fax: (804) 862-6196</p> </div> <div data-bbox="392 1211 516 1281" data-label="Text"> <p>Capital Region Office 2801 Kensington Office Richmond, VA 23221 Tel: (804) 367-2323 Fax: (804) 367-2391</p> </div> <div data-bbox="543 1211 684 1295" data-label="Text"> <p>Tidewater Region Office 14415 Old Courthouse Way 2nd Floor Newport News, VA 23608 Tel: (757) 886-2867 Fax: (757) 886-2868</p> </div> <div data-bbox="699 1211 831 1281" data-label="Text"> <p>Roanoke Region Office 1010 Patton Avenue, SE Roanoke, VA 24013 Tel: (540) 857-7585 Fax: (540) 857-7588</p> </div> <div data-bbox="850 1211 980 1295" data-label="Text"> <p>Northern Region Preservation Office P.O. Box 519 Stephens City, VA 22655 Tel: (540) 888-7029 Fax: (540) 888-7033</p> </div> | |

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| <p>Plan, a Scope of Collections Statement, a Museum Collection Management and Emergency Plan, and a revised Farm Management and Interpretive Plan for the Hensley Settlement.</p> <p>If the park is not already doing so, we encourage you to continue to computerize the inventory of historic resources, including adding the Geographic Information System data to the appropriate state databases. As you know, Virginia's computerized inventory is our Data Sharing System (DSS) and National Park Service staff may obtain a license to enter or access data throughout the Commonwealth free of charge in accordance with the information sharing provisions of the 2008 Nationwide Programmatic Agreement executed among the National Park Service, the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers.</p> <p>1. We agree that implementation of the General Management Plan is an undertaking subject to Section 106 of the National Historic Preservation Act. However, we cannot agree with the approach to Section 106 presented in the Section 106 summary nor can we agree with a determination of No Adverse Effect at this time. In our opinion effects cannot be determined at this time. The identification of historic properties is clearly not complete. We do not doubt the park's intent to avoid any effects to historic properties. However, the park may find that it is not be practicable and reasonable to do so in all cases. Should the park wish to continue to treat the implementation of the General Management Plan as one whole and entire undertaking, we recommend that a programmatic agreement be developed with all three states pursuant to Part 800.14(b) (1) (ii) of the Council's regulations.</p> <p>The 2008 Programmatic Agreement provides a practical approach to compliance with Section 106 for specific actions once the General Management Plan is completed and we suggest that consultation with SHPOs, THPOs, federally recognized tribes, other stakeholders and the public be conducted on these specific actions as more detailed plans become available. Please note that it is not necessary to consult with the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers under the terms of the Nationwide Programmatic Agreement to determine what individual actions are programmatic exclusions, and what actions will require review. The Streamlined Review Process is described in Stipulation III, including a list of "programmatic exclusions", or actions eligible for Streamlined Review (Stipulation III.C). According to the Nationwide Programmatic, Superintendents are to call a biennial meeting within six months of the date of execution of that agreement. We would be happy to participate by teleconference to discuss how the park wishes to proceed to implement the General Management Plan and/or the terms of the Nationwide Programmatic Agreement. It would be helpful for us, for example, to have the names of and the contact information for the park's 106 coordinator and the CRM Team members.</p> <p>If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me at (804) 367-2323, ext. 112; fax (804) 367-2391; e-mail ceaton@dhr.state.va.us.</p> <p>Administrative Services 10 Courthouse Ave. Petersburg, VA 23160 Tel: (804) 862-6415 Fax: (804) 862-6198</p> <p>Capital Region Office 2801 Kensington Office Richmond, VA 23221 Tel: (804) 367-2322 Fax: (804) 367-2391</p> <p>Tidewater Region Office 34415 Old Courthouse Way 2nd Floor Newport News, VA 23608 Tel: (757) 886-2807 Fax: (757) 886-2808</p> <p>Roanoke Region Office 1030 Pioneer Avenue, SE Roanoke, VA 24015 Tel: (540) 857-5585 Fax: (540) 857-5588</p> <p>Northern Region Preservation Office P.O. Box 519 Stephen City, VA 22685 Tel: (540) 868-7029 Fax: (540) 868-7033</p> | <p>1. The park regularly uses GIS to update information on cultural resources in the park. The park will continue to provide this information to the state SHPOs so they can incorporate this information and keep their records current.</p> <p>2. The NPS has conferred with the Virginia State Historic Preservation Officer on this comment. The text of the General Management Plan has been changed to state that adverse effects could potentially occur. However, because of the fact that specific future project designs are not yet available, a final conclusion regarding effects cannot be made. When specific projects are proposed that have a potential to affect cultural resources, they will undergo a full compliance review, to include Section 106 and National Environmental Policy Act assessments. These assessments will be tiered to the information in the General Management Plan / Environmental Impact Statement.</p> <p>3. The NPS will continue to consult with state Historic Preservation Officers, Tribal Historic Preservation Officers, and federally recognized tribes as required during the implementation phase of the General Management Plan. Note Response #2.</p> |

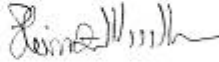
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| <p>Sincerely,</p> <p>Ethel R. Eaton, Ph.D., Senior Policy Analyst Office of Review and Compliance</p> <p>Sincerely,</p>  <p>Ethel R. Eaton, Ph.D., Senior Policy Analyst Division of Resource Services and Review</p> <div data-bbox="247 1209 982 1299"> <div> <p>Administrative Services 10 Courthouse Ave. Petersburg, VA 23803 Tel: (804) 867-6416 Fax: (804) 867-6106</p> </div> <div> <p>Capital Region Office 2801 Kensington Office Richmond, VA 23221 Tel: (804) 367-2323 Fax: (804) 367-2331</p> </div> <div> <p>Tidewater Region Office 14415 Old Courthouse Way 2nd Floor Newport News, VA 23608 Tel: (757) 896-2807 Fax: (757) 896-2808</p> </div> <div> <p>Roadside Region Office 1030 Pearson Avenue, SE Roanoke, VA 24013 Tel: (540) 857-7585 Fax: (540) 857-7588</p> </div> <div> <p>Northern Region Preservation Office P.O. Box 519 Stephens City, VA 22655 Tel: (540) 866-7020 Fax: (540) 866-7033</p> </div> </div> | |

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| <div data-bbox="590 225 678 310" data-label="Image"></div> <p data-bbox="457 321 812 406"> TENNESSEE HISTORICAL COMMISSION DEPARTMENT OF ENVIRONMENT AND CONSERVATION 2941 LEBANON ROAD NASHVILLE, TN 37243-0442 (615) 532-1550 </p> <p data-bbox="317 380 424 396">January 6, 2010</p> <p data-bbox="317 464 575 532"> Mr. Mark H. Woods Cumberland Gap National Historic Park Post Office Box 1848 Middlesboro, Kentucky, 40965-1848 </p> <p data-bbox="317 548 949 581"> RE: NPS, CGNHP/GENERAL MANAGEMENT PLAN, CUMBERLAND GAP, CLAIBORNE COUNTY </p> <p data-bbox="317 597 428 613">Dear Mr. Woods:</p> <p data-bbox="317 633 949 784"> In response to your request, received on Wednesday, December 16, 2009, we have reviewed the documents you submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicant for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800. You may wish to familiarize yourself with these procedures (Federal Register, December 12, 2000, pages 77898-77739) if you are unsure about the Section 106 process. </p> <p data-bbox="128 808 949 902"> 1. Considering available information, we find that the project as currently proposed MAY AFFECT PROPERTIES THAT ARE ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES. You should continue consultation with our office, designated consulting parties and invite them to participate in consultation, and provide us with appropriate survey documentation for review and comment. Please direct questions and comments to Joe Garrison (615) 532-1550-103. We appreciate your cooperation. </p> <p data-bbox="317 951 382 967">Sincerely,</p> <div data-bbox="302 976 485 1032" data-label="Text"></div> <p data-bbox="317 1036 537 1084"> E. Patrick McIntyre Executive Director and State Historic Preservation Officer </p> <p data-bbox="317 1101 371 1117">EPM/jyg</p> | <p data-bbox="1119 808 1940 984"> 1. The National Park Service has conferred with the Tennessee State Historic Preservation Officer on this comment. The text of the General Management Plan has been changed to state that adverse effects could potentially occur. However, because of the fact that specific future project designs are not yet available, a final conclusion regarding effects cannot be made. When specific projects are proposed that have a potential to affect cultural resources, they will undergo a full compliance review, to include Section 106 and National Environmental Policy Act assessments. These assessments will be tied to the information in the General Management Plan / Environmental Impact Statement. </p> <p data-bbox="1167 992 1921 1036"> The NPS will consult further with your office during the implementation phase of the General Management Plan, as required. </p> |

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| <div data-bbox="268 203 1024 440">  <div> <div>STEVEN L. BESHEAR GOVERNOR</div> <div> TOURISM, ARTS AND HERITAGE CABINET KENTUCKY HERITAGE COUNCIL </div> <div>MARCHETA SPARRROW SECRETARY</div> </div> <div> <div>THE STATE HISTORIC PRESERVATION OFFICE</div> <div>300 WASHINGTON STREET</div> <div>FRANKFORT, KENTUCKY 40601</div> <div>PHONE (502) 564-7005</div> <div>FAX (502) 564-5820</div> <div>www.heritage.ky.gov</div> </div> <div> <div>MARK DENNEN</div> <div>EXECUTIVE DIRECTOR AND</div> <div>STATE HISTORIC PRESERVATION OFFICER</div> </div> </div> <p data-bbox="296 475 394 492">April 27, 2010</p> <p data-bbox="296 532 506 602">David Libman National Park Service 100 Alabama Street, 1924 Bldg. Atlanta, Georgia 30303</p> <p data-bbox="352 643 957 675">Re: Draft General Management Plan/Environmental Impact Statement, Cumberland Gap National Historical Park, Bell and Harlan County, Kentucky</p> <p data-bbox="296 716 422 732">Dear Mr. Libman:</p> <p data-bbox="296 751 968 821">Thank you for the opportunity to comment on the draft plan for Cumberland Gap National Historical Park. We appreciate the tremendous responsibility involved in balancing visitor access and satisfaction with the maintenance and protection of historic properties. This was thoughtfully addressed in the draft plan.</p> <p data-bbox="296 846 982 932">Looking ahead to implementation of either Alternative B or C, areas of particular interest to this office are the expansion of the developed zones on either side of the Hensley Settlement and near Cumberland Gap, as well as the increased use of concessioners to provide services related to access. Work around Fern Lake is also of interest, as we do not currently have detailed information on existing structures or other resources associated with this site.</p> <p data-bbox="296 951 972 1044">The draft plan touches on the types of concerns we have when archaeologically sensitive areas and National Register listed properties come under Section 106 review. Much of the information we would need to make a well-informed determination of effect for any of the three alternatives has been noted in Chapter 5 and will be gathered as part of future studies and planning, so we believe the draft plan moves the park in the right direction for compliance with Section 106.</p> <p data-bbox="296 1065 972 1118">We look forward to working with you in reviewing the various elements of this plan when you are ready to begin implementation. When an alternative is ultimately chosen, we would be pleased to discuss development of a park-specific programmatic agreement.</p> <div data-bbox="279 1214 1010 1268"> <div>KentuckyUnbridledSpirit.com</div> <div>  <div>An Equal Opportunity Employer M/F/D</div> </div> </div> | <ol style="list-style-type: none"> <li data-bbox="1121 959 1923 1000">1. Thank you for your letter response. The NPS will coordinate and consult with the Kentucky State Preservation Officer during the implementation phase of the General Management Plan. |

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| <p>Page 2 David Lohman 4/26/2010</p> <p>If you have questions regarding these comments, please contact Jill McNutt (ext. 121) or Lori Stahlgren (ext. 151) of my staff at (502) 564-7005.</p> <p>Sincerely,  Mark Dennen Executive Director and State Historic Preservation Officer</p> <p>MD:jm</p> <p>KentuckyUnbridledSpirit.com  An Equal Opportunity Employer M/F/D</p> | |

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| <div data-bbox="279 240 369 329"> </div> <div data-bbox="422 246 833 329"> <p>UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 4 ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA, GEORGIA 30303-8960</p> </div> <div data-bbox="569 349 686 370"> <p>January 4, 2010</p> </div> <div data-bbox="287 410 571 534"> <p>David Libman National Park Service Southeast Region Atlanta Federal Center 1924 Building 100 Alabama Street, S.W. Atlanta, Georgia 30303</p> </div> <div data-bbox="287 553 905 617"> <p>SUBJECT: Draft General Management Plan/Environmental Impact Statement for the Cumberland Gap National Historical Park in Middlesboro, Kentucky; CEQ Number 20090371</p> </div> <div data-bbox="287 636 420 657"> <p>Dear Mr. Libman:</p> </div> <div data-bbox="287 677 963 823"> <p>The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Draft General Management Plan/Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The purpose of this general management plan and Draft EIS is to present a plan for managing the Cumberland Gap National Historical Park (CGNHP) in Middlesboro, Kentucky, for the next 15 to 20 years. The National Park Service (NPS) is the lead federal agency for the proposed action.</p> </div> <div data-bbox="100 842 966 1068"> <p>1. General management plans represent the broadest level of planning conducted by the NPS and are intended to provide overall guidance for making informed decisions about future conditions in national parks. The Draft EIS assesses the environmental impacts of three alternatives (A, B, & C) in terms of levels of service for visitor interpretation and education in the CGNHP, suitable locations for administration and visitor facilities, and management of the CGNHP to allow for preservation of natural and cultural resources. Alternative A is the no action alternative, continuation of present management practices. Alternative B would provide opportunities for enhanced visitor access by providing additional park facilities. Alternative C is identified as the NPS preferred alternative and is similar to Alternative B. However, it would also provide additional park facilities, increased levels of education, outreach, and formalized partnering efforts.</p> </div> <div data-bbox="287 1088 963 1213"> <p>The concept of Alternative C is to provide greater opportunities for visitor access and facilities in the park. This would be achieved primarily by having larger developed zones than the other alternatives. The total area of the developed zone in Alternative C would be over twice as large as the development zone in Alternative A, the no action alternative. Therefore, Alternative C would have a greater relative amount of land disturbing activity, as compared to the other alternatives, due to an increase in "hardened" types of access (e.g., parking areas, roads,</p> </div> <div data-bbox="373 1258 879 1291"> <p>Internet Address (URL) • http://www.epa.gov Recycled/Recyclable • Printed with vegetable oil based inks on Recycled Paper (Minimum 30% Postconsumer)</p> </div> | |

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| <p>and camping areas) and development of support facilities. However, the numbers and types of new facilities would be limited to protect natural and cultural resources in the park. New facilities would be proposed within the context of their location within the management zone. Sustainable designs and practices would be implemented wherever possible, and new facilities would be unobtrusive.</p> <p>1. A number of mitigation measures are proposed in the Draft EIS to avoid or minimize potentially adverse impacts from implementation of the new management plan and to ensure that the park's natural and cultural resources are protected and preserved for future visitors. EPA supports inclusion of these mitigation measures as part of the new general management plan for CGNHP, particularly the commitment to develop a resource stewardship strategy, including an updated cave management plan. EPA recommends that these programs include significant monitoring activities to ensure that the increase in hardened access areas and likely subsequent increase in recreational and educational usage of the park do not negatively impact natural and cultural resources. This is especially true for the expansion of the developed zone adjacent to Fern Lake, which is a designated public water-supply reservoir.</p> <p>We rate this document LO (Lack of Objections). EPA lacks objections to the proposed project and believes that the Draft EIS provided adequate information on the environmental impacts. All mitigation measures and monitoring programs, as described in the Draft EIS and including the above recommendations, should be fully implemented. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.</p> <p>Sincerely,</p>  <p>Heinz J. Mueller, Chief NEPA Program Office Office of Policy and Management</p> <p>cc: Cumberland Gap National Historic Park</p> <p>2</p> | <p>1. Site-specific, future plans will be consistent with park purpose, law, policy and be sustainable. Proposed actions will include environmental compliance documentation and opportunities for public input. This will include appropriate mitigation measures to avoid or minimize potentially adverse impacts. Monitoring will also be addressed during the implementation phase for site specific projects.</p> |

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| <p>From: Mike Floyd Sent: 01/17/2010 04:07 PM EST To: Mark Woods Cc: Lee Andrews/R4/FWS/DOI@FWS Subject: General Mgmt Plan / EIS for Cumb Gap NHP FWS #2010-B-0165</p> <p>Mr. Woods,</p> <p>1. Thank you for providing a copy of the Draft General Management Plan and EIS for Cumberland Gap National Historical Park (CGNHP). As we have discussed in the past, our primary concern regarding fish and wildlife resources at CGNHP is the continued protection and conservation of listed species, specifically blackside dace (<i>Chrosomus cumberlandensis</i>) and Indiana bat (<i>Myotis sodalis</i>). We appreciate your recent efforts and willingness to work with us in restoring the blackside dace population in Davis Branch, and we look forward to working with you in that and similar efforts in the future.</p> <p>We have completed our review of the draft documents and have no further, substantive comments at this time. Please let us know if we can be of further assistance in the planning process.</p> <p>Sincerely,</p> <p>Michael A. Floyd, PhD U.S. Fish & Wildlife Service Kentucky ES Field Office J C Watts Federal Bldg 330 West Broadway St., Room 265 Frankfort, Kentucky 40601 502-695-0468, x102 502-695-1024 (fax) 502-229-5433 (cell) mike_floyd@fws.gov</p> | <p>1. The NPS will continue to coordinate and consult with the United States Fish and Wildlife Service regarding listed species.</p> |

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| <p>DRAFT PLAN COMMENTS Steve Roark, Forester Tennessee Division of Forestry 2178 Hwy 25 E, Suite 1 Tazewell, TN 37879</p> <p>Alternative C is the best choice, as it will provide the greatest increase in use opportunities for visitors and enhance their enjoyment of the park. It will also increase tourism to the area and thus help the local economy. I would include myself as a high use visitor. Some points I particularly liked in reviewing alternative C are as follows:</p> <p>Increase levels of education/outreach: Interpretive opportunities of the park's history will always be important. The park can also provide an important backdrop to provide educational opportunities on the importance of natural resources and their protection. As a forester I find a disturbing disconnect between people and nature. And I fear that lack of education about natural resources leads to a lack of care, or perhaps misguided care.</p> <p>1. While on the subject of interpretation, I would like to suggest the establishment of some plant communities that existed in the area before the arrival of Europeans. The three that show up regularly in old travel journals are open woodlands or savannahs, stands of native warm season grasses, and canebrakes. Since the park has a burn module, the creation or enhancement of these cover types through use of fire seems doable. I would think they could be established in one of the Cultural Resource Zones, as these cover types were intimately connected to Native Americans. And it would be interesting to show what the landscape perhaps looked like when the Europeans started poking around. Most people think the area was an undisturbed "forest primeval", which is incorrect.</p> <p>New facilities will be designed and installed to minimize negative impacts; sounds proper and good.</p> <p>Fern Lake Development: I'm particularly excited about the addition of the Fern Lake area to the park's protective umbrella. Protecting the lake's watershed is a tremendous accomplishment on many fronts, clean water and maintaining viewsheds being two of particular importance. Developing hiking trails (with care) in the area would also be a desirable enhancement. I would like to put in a plug for public use of the lake itself whenever it is purchased and under park control. Fishing and (non-motorized) boating would be wonderful additions to the park's "things to do"</p> <p>Hensley Settlement Access: I strongly approve of the development of a satellite parking area near the bottom of Shillalah Creek Road. I've heard several comments from other hikers that they are fearful of leaving a vehicle parked at the road gate. A developed parking area that will be monitored should put users more at ease.</p> <p>I think the increased accessibility to Hensley Settlement described in Alternative C is reasonable without going overboard. Limiting access to the site by vehicles should continue to be enforced to protect the area. One suggestion I might make is to allow the use of the shuttle buses by hikers who might want to ride up and use the hiking trails on top of the mountain, then ride or walk back off. This might at least be offered to senior citizens.</p> | <p>1. A limited amount of this type of planting has in fact been done in a small plot near the Visitor Center. Additional plots of vegetation could be constructed along the walking trails in the vicinity of the Visitor's Center, but this type of project is not planned for other areas of the park at the present time. Trees displayed in the refinished Visitor Center are also used to show what types of large, old growth were present in the park before the arrival of Europeans. In addition, natural stands of some historic vegetation such as cane breaks already occur in the park and can be seen by visitors along Old Yellow Creek.</p> |

LIST OF RECIPIENTS

Notices of availability of the Draft General Management Plan / Environmental Impact Statement were mailed to the list of recipients provided in Appendix K.

LIST OF PREPARERS

Cumberland Gap National Historical Park

Mark Woods, Superintendent
Christopher Phillips, Assistant Superintendent
Mary Collier, Asst. Superintendent (Retired)
Ries Collier, Chief of Resource Management Division (Retired)
Jenny Beeler, Resource Division Manager
Charlie Chadwell, Chief Park Ranger
Carol Borneman, Chief of Interpretation
Will Spencer, Information Technology Specialist
Deanna Phillips, Administration
Bill Brumbach, Maintenance Division Manager
Dirk Wiley, Ranger Activities Division Supervisor
Carol Burkhart, Cultural Resources Manager

National Park Service Southeast Regional Office

Rich Sussman, Chief of Planning (Retired)
David Libman, Park Planner

Parsons

Alyse Getty, Technical Director
Steven Bach, Project Manager
Angie Cook, Environmental Scientist/Geologist
John Martin, Senior Transportation Planner (Retired)
Diane Rhodes, Cultural Resources Specialist
Timberley Belish, Environmental Scientist
Bai Tian, GIS Specialist
Kathy Rowland, GIS Specialist, Environmental Scientist
Judy Shumake, Graphic Artist/Word Processing
Drew Getty, Associate Planner

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