



Abbreviated Final General Management Plan / Environmental Impact Statement

July 2014



**Abbreviated Final
General Management Plan / Environmental Impact Statement**

**Lake Meredith National Recreation Area and
Alibates Flint Quarries National Monument**

Hutchinson, Moore, and Potter counties, Texas

Lake Meredith National Recreation Area was established by Congress in 1964, and its management was transferred to the National Park Service (NPS) in 1990. Its primary purpose is to provide public access to diverse land- and water-based recreational opportunities in the Texas panhandle. Although its management has been guided by a master plan and statement for management, a general management plan was not previously prepared for this national park unit.

Alibates Flint Quarries National Monument was established by Congress in 1965 to provide for the preservation, protection, interpretation, and scientific study of Alibates flint deposits. The national monument is on the eastern edge of Lake Meredith National Recreation Area and the two national park system units are managed jointly. A management plan for the national monument was prepared by the National Park Service in 1976 and amended in 1985, but is out of date and does not meet the requirements of a general management plan.

The *Lake Meredith National Recreation Area and Alibates Flint Quarries National Monument Draft General Management Plan / Environmental Impact Statement* examines three alternatives for managing Lake Meredith National Recreation Area and three alternatives for managing Alibates Flint Quarries National Monument. The management timeframe is 15 to 20 years. The environmental impact statement component of the document analyzes the impacts of implementing each alternative.

Lake Meredith National Recreation Area

- Alternative 1, the no action / continue current management alternative, would extend existing conditions and trends of national recreation area management into the future. This alternative serves as a basis of comparison for evaluating the action alternatives.
- Alternative 2 would focus on providing quality recreation, enhancing traditional activities, and improving resource protection. The focus would be on providing a better visitor experience through additional or improved facilities and increased interpretation in accessible settings, and expanding opportunities in more natural rural and semi-primitive zones.
- Alternative 3 is the NPS preferred alternative. It would promote both traditional and nontraditional uses, and develop facilities and opportunities to address changing lake conditions and visitor uses. The national recreation area would become a destination for semi-primitive outdoor recreation opportunities and would strengthen partnerships to improve visitor experience.

The draft environmental impact statement evaluated impacts of the alternatives on special status species, soils, archeological resources, historic structures and buildings, visitor use and experience, socioeconomics, transportation and access, and NPS operations. Alternative 3, which would promote recreation that does not rely on the presence of the lake, would have major, long-term, beneficial impacts on visitor use and experience. All other impacts of the alternatives would be less than major.

Alibates Flint Quarries National Monument

- Alternative A, the no action / continue current management alternative, would extend existing conditions and management of the national monument into the future. This alternative serves as a basis of comparison for evaluating the action alternatives.

- Alternative B is the NPS preferred alternative. It would expand interpretation and education to provide a better understanding and appreciation of the flint and the people who quarried and used it while maintaining access restrictions that protect the archeological resources.
- Alternative C would provide a greater understanding and appreciation for archeological protection through enhanced educational opportunities and research. It also would accommodate a wider range of visitor uses and experiences by zoning part of the national monument for unrestricted visitor access by foot.

Impact topics evaluated for Alibates Flint Quarries National Monument included archeological resources, visitor use and experience, and NPS operations. All aspects of the Alibates Flint Quarries National Monument alternatives would have less than major impacts.

The draft general management plan / environmental impact statement was distributed to other agencies and interested organizations and individuals for review and comment. This abbreviated final general management plan / environmental impact statement presents the comments and agency responses and a correction (errata) sheet that shows minor changes made to the draft. The draft and the abbreviated final constitute a full final document. Because these changes were minor, the National Park Service has permission to prepare this abbreviated document.

For further information, please contact the superintendent, Lake Meredith National Recreation Area, 419 East Broadway, Fritch, Texas 79036.

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INTRODUCTION

This is an abbreviated final general management plan / environmental impact statement for Lake Meredith National Recreation Area and Alibates Flint Quarries National Monument. The material included here is to be combined with the *Lake Meredith National Recreation Area and Alibates Flint Quarries National Monument Draft General Management Plan / Environmental Impact Statement* that was distributed for public review in January 2013. The 60-day public review period was held from March 29, 2013 through May 28, 2013. The abbreviated format is used because changes to the draft document are minor and do not modify the analysis provided in the draft general management plan / environmental impact statement.

Use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 *Code of Federal Regulations* or CFR 1503.4 (c)) and Section 4.6D of *Director's Order 12 and Handbook: Conservation Planning, Environmental Impact Analysis, and Decision Making*. The draft and abbreviated

final documents together present the full *Lake Meredith National Recreation Area and Alibates Flint Quarries National Monument Final General Management Plan / Environmental Impact Statement*, including the alternatives, associated environmental impacts, comments that were received and evaluated and responses to the comments.

Release of this abbreviated final general management plan / environmental impact statement will be announced in the *Federal Register*. Following a 30-day no-action period, a "Record of Decision" (ROD) of the approved final plan will be prepared for signature by the regional director, Intermountain Region, National Park Service. Copies of the ROD will be made available to the public on the park's planning website at <http://parkplanning.nps.gov/lamr>.

For further information, please contact the superintendent, Lake Meredith National Recreation Area, 419 East Broadway, Fritch, Texas 79036.

CONSULTATION AND COORDINATION

This section summarizes the agency, organization, and public comments received on the draft general management plan / environmental impact statement. These comments allow interested parties (including NPS decision-makers) to review and assess how other agencies, organizations, and individuals responded to the proposed actions and alternatives and their potential impacts. The National Park Service provides responses to those comments identified as substantive. Substantive comments are those that (1) question, with reasonable basis, the accuracy of information in the environmental impact statement, (2) question, with reasonable basis, the adequacy of environmental analysis, (3) present reasonable alternatives other than those presented in the environmental impact statement, or (4) cause changes or revisions in the proposal. The National Park Service also provided responses to comments when doing so would improve understanding of the process or the plan.

PUBLIC REVIEW

A notice of availability of the draft general management plan / environmental impact statement was published in the *Federal Register* on April 1, 2013. The official review and comment period began on March 29, 2013, and ended May 28, 2013. Agencies, organizations, and individuals on the parks' mailing list either received a copy of the document or were notified by mail that the document was available on the NPS Planning, Environment, and Public Comment website, based on their preference as indicated on previous mailings. Two public meetings were held to present the draft general management plan and answer questions. The public meetings were preceded by notice on the Planning, Environment, and Public Comment website and through announcements to local media.

On April 30, 2013, a public meeting was held at the Ashmore Inn and Suites in Amarillo, Texas. On May 1, 2013, a meeting was held at the Sanford Fritch School's Business Office in Fritch, Texas. Both meetings were held as an open house from 5:30 p.m. to 7:30 p.m. Representatives of the National Park Service were available at each meeting to discuss the draft general management plan, answer questions, hear concerns, and discuss the planning process. A total of 27 individuals attended the meetings. Public comments were recorded by the planning team and considered during review of public comments.

The draft general management plan / environmental impact statement was also sent to 10 federally and state-recognized tribes identified as having a cultural affiliation with the parks. The tribes were asked to review the draft document and provide the National Park Service with comments. No written responses were received from any of the associated tribes.

Approximately 25 written and electronic comments were received. The public did not present any new alternatives, and public comment analysis did not result in any modifications to the current alternatives. Letters from federal, state, and local governments and organizations are reproduced at the end of this document, as required. Several agencies stated they had no comment. The U.S. Environmental Protection Agency had several questions on the document; the NPS response is included in the comments and responses below.

Consistent with the requirements of 40 CFR 1503, the public's comments were considered by the Park Service in preparing this abbreviated final general management plan / environmental impact statement. The following section summarizes substantive comments and includes responses from the National Park Service.

COMMENTS AND RESPONSES

Agency Comments

Comment: The U.S. Environmental Protection Agency commented that the draft general management plan / environmental impact statement does not address a comment they made on the *Draft Lake Meredith National Recreation Area and Alibates Flint Quarries National Monument Oil and Gas Management Plan* related to existing and abandoned, but not reclaimed, oil and gas wells in the park.

Response: The National Park Service addressed this comment in the 2002 *Final Lake Meredith National Recreation Area and Alibates Flint Quarries National Monument Oil and Gas Management Plan*. The management of oil and gas operations is outside the scope of this general management plan. As noted in chapter 1 of the draft general management plan, the plan would be consistent with the 2002 oil and gas management plan. No actions being considered in this plan would have an impact on oil and gas operations and therefore impacts on these operations are not analyzed in this plan. For this reason, no impacts from oil and gas operations, outside of the cumulative impacts described in “Chapter 4: Environmental Consequences,” were considered.

Comment: Because their responses were not included in the draft general management plan, the U.S. Environmental Protection Agency commented that the final general management plan / environmental impact statement should incorporate concurrence from (1) the Texas state historic preservation office (SHPO), Advisory Council on Historic Preservation, and Tribal Historic Preservation Office (THPO) on conclusions reached concerning historic, cultural, or archeological resources; (2) federally and state-recognized tribes with a cultural affiliation to Lake Meredith National Recreation Area and Alibates Flint Quarries National Monument; and (3) the U.S. Fish and Wildlife Service on the NPS determination for impacts of the

proposed project to threatened and endangered species.

Response: Consistent with NPS practice and guidance, the draft environmental impact statement is the vehicle for consultation with these agencies. Their responses (and concurrence as applicable) are included in this final general management plan / environmental impact statement, discussed below. As described in “Chapter 5: Consultation and Coordination,” the general management plan was developed considering the comments of other agencies, American Indian tribes traditionally associated with the parks, and the public. Consultation and coordination among these groups were vitally important throughout the planning process. In “Consultation with Other Agencies, Officials and Organizations,” the draft general management plan describes what has been done to date and what will be necessary for future undertakings that may be proposed for implementation with regard to U.S. Fish and Wildlife Service, Section 7 Consultation, Section 106 Consultation, and consultations with traditionally associated American Indian tribes.

Comment: The U.S. Environmental Protection Agency commented that the final environmental impact statement should describe mitigation measures the National Park Service will undertake to minimize impacts to cultural, historical, or archeological resources.

Response: Mitigation measures for cultural, historical, and archeological resources were addressed under mitigation measures in the “Cultural Resources” section on page 126 of the draft general management plan. Other mitigation measures would be considered as part of site specific planning.

Comment: The U.S. Environmental Protection Agency commented that the dollar amount listed for total one-time capital costs in table 7 appears to be incorrect. This number is supposed to reflect the one-time

capital costs for both essential and desirable projects, but only reflects the cost for essential projects.

Response: The total one-time capital costs listed in “Table 7: Summary of Costs for Alternative 3,” on page 100 of the draft general management plan is correct. The value listed in “Table 8: Essential One-time Capital Costs for Alternative 3” under visitor infrastructure and experience, interpretation/trails and access is incorrect. This value will be corrected to read \$725,500, which will then make the total value listed in table 7 accurate.

The U.S. Fish and Wildlife Service responded by email on September 26, 2013 and stated it was declining to comment on the draft general management plan/environmental impact statement.

On October 25, 2013, the Bureau of Reclamation responded by email and stated it had no comments on the draft general management plan/environmental impact statement.

The Texas state historic preservation office responded by email on December 18, 2013 that it did not have any comments on the draft general management plan/environmental impact statement.

Comments from the General Public

Comment: One commenter questioned if the National Park Service / U.S. Department of the Interior considered selling significant portions of the Lake Meredith National Recreation Area for private development while keeping the "roots" and most utilized areas for use as the national park.

Response: The purpose of the general management plan is to identify approaches to management of the national recreation area.

Any proposed boundary changes must be authorized by Congress. Disposal of lands within the national recreation area was

not considered and would not have addressed management issues identified in this plan.

As stated on page 53-54 of the draft general management plan, the National Park and Recreation Act of 1978 requires general management plans to address whether boundary modifications should be made to park units. Boundary adjustments may be recommended to

- protect significant resources and values, or to enhance opportunities for public enjoyment related to park purposes
- address operational and management issues, such as the need for access or the need for boundaries to correspond to logical boundary delineations such as topographic or other natural features or roads
- otherwise protect park resources that are critical to fulfilling park purposes

Additionally, all recommendations for boundary changes must meet the following criteria:

- The added lands will be feasible to administer considering their size, configuration, and ownership; costs; the views of and impacts on local communities and surrounding jurisdictions; and other factors such as the presence of hazardous substances or exotic species.
- Other alternatives for management and resource protection are not adequate.

For a boundary adjustment to be recommended, at least one of the criteria in the first group must be met, as well as both criteria in the second group.

Comment: One commenter questioned whether the national monument boundary would be expanded should cultural resources be discovered just outside the boundary of the

national monument, but within the boundary of the national recreation area.

Response: All national park units are subject to the same laws and policies. It would not be necessary to change the boundary of the national monument to protect cultural resources in the national recreation area. If additional resources were discovered outside the boundaries of either unit, a boundary adjustment would need to meet the criteria presented on page 53-54 of the draft general management plan to be considered.

Comment: One commenter asked what types of management techniques the National Park Service will use to protect resources within the private inholding within the national monument. The commenter also asked how the National Park Service will work with neighboring landowners to protect resources in the national recreation area.

Response: The National Park Service would continue to use agreements and other mechanisms as appropriate with adjacent landowners for specific resource management or interpretation tasks.

Comment: Because the water level does not fluctuate in Spring Canyon, a suggestion was made to allow for additional recreational opportunities in this area. The suggested activities include the use of canoes and kayaks, a commercial operation for food service and equipment rental, and a recreational vehicle campground. The comment also suggested the area could be a fee area.

Response: Under the action alternatives, Spring Canyon would be zoned for the following activities:

- Water-based activities, including swimming, fishing, and scuba diving
- Land-based activities, including picnicking, hiking, and nature observation
- Additional activities, including picnicking and nature observation

The National Park Service received permission from the Canadian River

Municipal Water Authority to allow for use of the following vessels in designated areas in the Spring Canyon stilling basin: canoes, kayaks, rowboats, paddle boards, and rubber rafts when paddled or oared. The Superintendent's Compendium was revised to allow for these uses.

Spring Canyon is the spillway area for the dam. While the National Park Service manages use of this area, the Bureau of Reclamation manages the dam itself. After September 11, 2001, the Bureau of Reclamation initiated many dam protection regulations, including two major changes within the national recreation area: closing to the public of the area around the dam face and making Spring Canyon a day use only area. Therefore, this area of the national recreation area could not be opened to overnight use. In addition, the area does not have access to electricity or drinking water and it is unlikely those services could be provided economically.

As noted in the draft environmental impact statement, over the life of the plan, additional commercial visitor service activities may be considered at the national recreation area. Potential activities would be evaluated based on the necessary and appropriate criteria described on page 24 of the draft general management plan.

Comment: A comment was received stating that visitors would like the opportunity to use metal detectors to look for lost coins and jewelry. The commenter stated this is a good family activity and would help to remove trash such as lead shot and fishing weights, beer and soda cans, etc., from the national recreation area, and that money could also be raised from daily permits.

Response: The use of a metal detector is prohibited by federal law in all national park units. Federal Regulation 36 CFR 2.1(a)(7) states "Possessing or using a mineral or metal detector, magnetometer, side scan sonar, or other metal detecting

device, or subbottom profiler is prohibited.”

Comment: A commenter suggested developing a disc golf course similar to the one in the City of Borger, Texas.

Response: Because the suggested use is consistent with the purpose and significance of the park and proposed actions in the draft general management plan, the National Park Service could consider development of a disc golf course pending funding and completion of necessary environmental compliance.

Comment: A commenter expressed the opinion that camping should not be restricted to "organized campgrounds."

Response: Under the action alternatives, most camping would occur within designated areas to maximize resource protection and provide benefits for the visitor experience. Open camping (with no designated camping areas) would continue to be available at Cedar Canyon Beach. Similarly, there would continue to be beach camping opportunities at Harbor Bay; there are no designated sites on the beach.

Providing for visitor enjoyment, understanding, and stewardship is one of the fundamental purposes of the National Park Service. The National Park Service manages these activities in a manner to ensure that natural and cultural resources and public health and safety are protected.

Comment: A commenter questioned if the environmental impact statement included analysis of the impacts from the *Lake Meredith National Recreation Area Multi-Use Trail Environmental Assessment* and the *Draft Lake Meredith National Recreation Area Off-Road Vehicle Management Plan / Environmental Impact Statement*.

Response: The site-specific impacts of the multi-use trail and off-road vehicles in the national recreation area are addressed in the multi-use trail plan and off-road vehicle plan, respectively. Both plans are

referenced in chapter 1 of the draft general management plan in the section describing planning efforts that have a relationship to the general management plan / environmental impact statement. In “Chapter 4: Environmental Consequences” of the draft general management plan, the two plans are also considered for their contribution to the cumulative effects of past, present, and reasonably foreseeable actions. The relevant site-specific impacts of these plans are discussed for each impact topic in the cumulative impact analysis.

Comment: A commenter stated there are areas of the national recreation area that have not been surveyed for archeological, ethnographic, and historic resources and that these surveys should be undertaken before implementing any actions.

Response: As noted on page 126 of the draft general management plan, the National Park Service is committing to using the mitigation measures described in this plan as necessary during implementation of the proposed actions. The actions described under the “Cultural Resources” section include a commitment to inventory all unsurveyed areas in the parks for archeological, ethnographic, and historical resources. In addition, an archeological survey would be completed, as necessary, in areas proposed for development.

Comment: A commenter suggested that comprehensive surveys should be completed in areas exposed by dropping lake levels.

Response: Archeological inventories of the reservoir site were completed prior to the construction of the dam. Additional assessments would be completed as resources became uncovered and would be consistent with applicable law and policy.

Comment: A commenter suggested the National Park Service educate visitors on the factors that hastened the depletion of water in Lake Meredith. Even though the area is

subject to drought, demands placed on this reservoir are greater now. Although the National Park Service has no control over the water, it has exclusive control over interpretation in the park and should use this opportunity to educate visitors on how water resources are over-used and under-appreciated in the United States.

Response: The preferred alternative includes development of additional wayside exhibits and interpretive materials. Aquatic, wetland, and riparian resources and habitats are among the fundamental resources and values of the national recreation area, and are included in the national recreation area's interpretive themes. Additional interpretation of changes to resources could be developed in future implementation planning and would be supported by scientific research and monitoring.

Comment: Commenters suggested that fees could be used to support the national recreation area but may also discourage some visitation. They suggested the National Park Service should consider if fees are really necessary. In some instances, not having fees increased the sense of public ownership of parks because it is such a contrast to commercial money-making attractions.

Response: Alternative 2 and the preferred alternative would include a fee study to determine appropriate fees for improvements to park facilities. The studies would help to determine appropriate fee rates that would support park operation needs.

Fees collected would have to be used for visitor-related activities. In the future, the National Park Service may not be able to develop visitor facilities without collecting fees to support them.

Comment: A commenter requested the National Park Service to describe the potential threats to historic and archeological resources from increased visitor access to the national monument.

Response: NPS *Management Policies 2006* and the National Historic Preservation Act direct the National Park Service to manage cultural resources and avoid unacceptable impacts. Under all alternatives proposed in the draft general management plan, archeological resources throughout the national recreation area and the national monument would be monitored to ensure their integrity is maintained. Unguided access would only be allowed in suitable areas and where resources have been stabilized.

Under all the alternatives, access to the most sensitive areas of the monument would continue to be restricted. As stated on page 212 of the draft general management plan, under the preferred alternative, increased access to the national monument would include expanded interpretation associated with new, guided tours to the ruins and petroglyphs by special request. The potential impacts from tours to the ruins and petroglyphs are considered adverse because the tours could result in disturbance of these sensitive resources. However, there would be no unrestricted access to the national monument under the preferred alternative. All tours would continue to be conducted by NPS staff, and participants would be monitored to ensure they did not damage archeological resources. Therefore, impacts from expanded tours would be negligible.

Comment: A commenter stated that alternative B includes provisions for a self-guided tour, which could lead to the loss of control over restricted access. The commenters stated that the document is not specific in what measures can ensure access control for the Antelope Creek ruins or Alibates quarries.

Response: Under alternative B, there would be no unrestricted access to the national monument. The self-guiding interpretive trail discussed in the alternative would be near the visitor contact station that falls within the

boundaries of Lake Meredith National Recreation Area.

The trail would not be located near sensitive resources in the national monument and would provide opportunities to interpret how the landscape has contributed to the long history of human occupation in the area. Access to sensitive areas within the national monument would continue to require the company of a NPS guide.

Comment: A commenter questioned the rationale for not allowing grazing in the national recreation area.

Response: As noted on page 34 of the draft general management plan, past human activity, including recreation, oil and gas operations, and grazing have introduced at least 37 nonnative plant species. Consistent with NPS policies, park staff has undertaken a number of management actions to encourage the growth of native plant species. These management actions are ongoing and would not change with implementation of the general management plan. While grazing within the national recreation area is permitted by establishing legislation, it is not mandated and the National Park Service has determined that allowing grazing would not be consistent with natural resource management objectives and is not currently in the best interest of the national recreation area.

Comment: One commenter felt that alternatives 2 and 3 unfairly focus on non-motorized recreation and limit off-road vehicle access in the national recreation area. The commenter stated that the draft plan did not adequately consider the social and economic impacts of limiting off-road vehicle use and that the areas of Lake Meredith that are currently dry should be open to off-road vehicle use.

Response: Management of off-road vehicle use in the national recreation area is outside the scope of this general management plan and therefore impacts

from off-road vehicle use were not analyzed as part of this plan. As mandated by Congress, the use of off-road vehicles is provided for in two areas of Lake Meredith National Recreation Area. The two areas include a 275-acre area at Blue Creek and a 1,500-acre area at Rosita. Use of these areas by off-road vehicles predates the establishment of the national recreation area and their use outside of these areas is prohibited by law. During the planning process for the *Lake Meredith National Recreation Area Draft Off-Road Vehicle Management Plan / Environmental Impact Statement*, expansion of off-road vehicle use to areas outside of Blue Creek and Rosita Flats was considered but dismissed for several reasons, as described on page 64 of that plan.

Fees for off-road vehicle use and the effects of fees on their use would be addressed in a fee study for the entire national recreation area.

Comment: A commenter stated that representative historic features of the area's ranching history should be preserved for interpretation.

Response: Within the boundary of the national recreation area, remnants of at least five ranching operations have been identified. These resources would continue to be protected from disturbance and adverse impacts, but due to their locations, on-site interpretation would not be developed under any of the alternatives.

Comment: A commenter asked if the Alibates ruins are considered structures, if stabilization measures are conducted, and if there is analysis of the ruins in the document.

Response: The ruins at Alibates Flint Quarries National Monument are not considered structures. Impacts to the ruins associated with increased visitor access are analyzed in "Chapter 4: Environmental Consequences" of the draft general management plan. Under

existing management practices, NPS staff inventory cultural resources within both parks to establish a baseline against which future conditions can be compared. They also monitor for stable conditions and take action whenever the need arises. These management actions would continue with or without a general management plan.

Comment: Several commenters felt that road closures should be limited and that decisions related to road closures should consider accessibility so visitors with disabilities can still visit the park.

Response: The purpose of the road closures would be to remove redundant roads, thereby reducing habitat fragmentation and making maintenance operations more efficient. For example, if multiple roads can be used to access the same destination, there would be no reason to maintain all roads. Additional analysis would be necessary to identify roads that could be considered for closure. Accessibility issues, such as the design of roadway-related facilities like parking areas and restrooms, would be addressed during subsequent planning.

Comment: One commenter felt that installation of “scuba targets” would require specialized staff expertise and would not be safe in proximity to the dam.

Response: There appears to be some confusion about the term “scuba targets,” as used in the draft general management plan. In this context, the targets would consist of underwater features designed to enhance the recreational experience by giving divers something to look for under water. The National Park Service does not believe this would present a security issue because no guns and/or spears would be involved. To clarify, the term “scuba targets” will be replaced with “underwater features.”

Comment: A commenter questioned that the plan does not call for an increase in staff that they felt would be necessary to protect the

park’s resources when there is both greater access and an increase in visitors.

Response: The draft general management plan represents a future management framework that, if fully implemented, would require staff and development funds as estimated and presented in the draft general management plan. The proposed staffing and development was reviewed and approved by NPS management as a general estimate of priority needs that could result from implementing the general management plan. However, as stated in the draft general management plan, the plan would not guarantee funding, and future NPS budgets and programs would determine the schedule for implementation of the preferred alternative.

Comment: One commenter requested that the dam be opened to foot traffic, fishing, and other activities.

Response: Access to the dam is managed by the Bureau of Reclamation. The bureau is the only agency able to decide if and when to allow foot traffic on the dam.

Comment: A commenter questioned why only 10 recreational vehicle sites with hook ups are being considered.

Response: The current estimate is based on a preliminary assessment of the site and the final number would be determined during site specific planning. Based on initial assessment, it does not appear the National Park Service could access or install electric utilities in all areas of Sanford-Yake. Additionally, not all sites could accommodate a recreational vehicle.

Comment: Several commenters suggested including shower facilities in the campgrounds with recreational vehicle hook ups.

Response: The National Park Service would consider installing shower facilities in the campgrounds with recreational vehicle hook ups during site-specific planning. If the National Park Service is

able to provide showers as part of the final site plan, a fee may be required for their use.

Comment: A commenter requested the National Park Service to dredge the boulder out of the way of the launch ramp and add more water to the lake.

Response: There are many obstacles throughout the lake. If the obstacle poses a health hazard, the National Park Service would mark it, but it is unlikely it would be removed.

The National Park Service does not control the amount of water in the lake. The lake serves as a drinking water supply and is managed by the Canadian River Municipal Water Authority.

Comment: Several commenters suggested the National Park Service maintain existing and add additional hiking trails. It was suggested that mountain bike trails be single track trails to encourage greater use.

Response: The multi-use trail along the canyon rim would continue to be developed as resources allow. Both action alternatives for the national recreation area propose additional trails.

The trails constructed within the national recreation area would be created primarily within previously disturbed areas and would be developed to serve a variety of user groups.

Comment: A commenter felt that the National Park Service should spend money on improving the visitor experience before any money is spent on consolidating the park management.

Response: The proposed actions are divided into two categories, essential and desired activities. The proposed actions related to improving visitor experience have all been identified as essential activities; consolidating park operations is listed as a desirable activity. The National Park Service supports consolidating park operations because it would reduce costs

in the long-term compared to renovating existing administrative facilities and operating the recreation area and monument from multiple facilities and locations. As noted in the discussion on page 87 of the draft general management plan, identification of costs does not guarantee future NPS funding. Funding for a consolidated operations center may take several years to secure and could be partly obtained through partners, donations, or other non-NPS federal sources. Although the National Park Service hopes to secure funding, the national recreation area may not receive enough funding to immediately achieve all desired conditions proposed within the general management plan.

Comment: One commenter felt that removing the term “Panhandle Pueblo Culture” from the name of the national monument seems to indicate that the site is less important than it once was. The commenter felt that as a result of this name change, the potential connection to pueblo cultures has been removed and fewer people may understand its importance.

Response: Resources associated with the Antelope Creek people are fundamental to the national monument and are extensively interpreted. The preferred alternative includes expanded interpretation of the Antelope Creek people.

The accepted archaeological name for the ruin sites affinity is the Antelope Creek phase of the Plains Woodland period. Despite their apartment-like construction and the presence of southwestern raw material and artifacts, the Puebloan relationship is most likely the result of an exchange of ideas and items through contact, including trade and not an eastern extension of the prehistoric pueblos of New Mexico. The current name of the national monument is more accurate; using the Panhandle Pueblo Culture designation would be misleading to the public.

Comment: Several commenters questioned the impact of excavating one quarry pit in Alibates Flint Quarries National Monument.

Response: A site-specific implementation plan and design would be prepared prior to excavation of a quarry pit. The compliance pathway would be determined through the scoping process. Actions such as controlled archeological excavation methods; nonintrusive surface geophysical techniques such as ground-penetrating radar, techniques to remove the debris, and recording results; and as appropriate, cataloguing and adding the contents of the pit to the NPS museum collection, would be conducted in consultation with the Texas state historic preservation officer, the Advisory Council on Historic Preservation, and all associated American Indian tribes to identify appropriate methods and mitigations.

Comment: A commenter stated that the document does not mention that two quarry pits were excavated within the past 10 years by a professional consulting archeological company, and felt that the need for further excavations should be carefully assessed.

Response: The previous excavation occurred on a single quarry pit and took place in an area not easily accessible to the public. Due to its location and the fact that this quarry has already been excavated, it would not meet the objective of the preferred alternative in excavating for interpretation.

Comment: A commenter questioned how tours of the ruins and petroglyphs in Alibates Flint Quarries National Monument could be considered adverse.

Response: The potential impacts from tours to the ruins and petroglyphs are considered adverse because the tours could result in disturbance of these sensitive resources. However, tours would be conducted by staff or trained volunteers and designed to limit impacts to these resources. These impacts are

discussed on page 212 of the draft general management plan.

Comment: A commenter noted that the “McBride project” was not specifically included in the estimate for alternative 3 and asked if it had been left out.

Response: The McBride Ranch House has been stabilized. No additional costs are anticipated to accommodate guided visitor access.

Comment: A commenter questioned if the mitigation measures listed under “wetland trail improvements” were included in estimated costs under any alternatives.

Response: The mitigation measures described on page 125 of the draft general management plan are those that the National Park Service would commit to based on the resources in the park. Even though a mitigation measure is listed here it does not mean there are related actions proposed at this time; therefore, no costs are to be included in estimated costs for the alternatives.

Comment: A commenter stated that it is important to be proactive in planning new access and activities to determine user or carrying capacity for the park as a whole as well as for specific sites. The commenter asked if the national recreation area and its resources, some of which are fragile, can sustain greater recreation without serious impacts to the resources.

Response: The National Park Service defines user capacity as the types and levels of visitor use that can be accommodated while sustaining the quality of park resources and visitor experiences consistent with the purposes of the park. Managing user capacity in national parks is inherently complex and depends not only on the number of visitors but also on where the visitors go, what they do, and the “footprints” they leave behind. In managing user capacity, NPS staff and partners employ a variety of management tools and strategies rather than relying solely on regulating the

number of people in a park area. In addition, the ever-changing nature of visitor use in parks requires an adaptive approach to user capacity management.

The “User Capacity” section of the draft general management plan (page 62) describes the process for managing visitors to maintain desired conditions. Table 4 is a summary of the indicators and standards that would be used to evaluate resource conditions. The table also includes a list of appropriate management strategies. For example, if use levels and patterns change appreciably, NPS staff might need to identify new indicators to ensure that desired conditions are achieved and maintained. This iterative learning and refining process, a form of adaptive management, is a strength of the NPS user capacity management program.

Comment: A commenter expressed concern that illegal hunting, trespassing, and collecting of artifacts are mentioned and acknowledged as adverse actions in various locations in the document, but no real mitigation measures are proposed.

Another commenter stated that mitigation measures included in the draft general management plan are generic and it is not known how these will be adhered to.

Response: The National Park Service manages and responds to illegal activities within both park units consistent with existing laws and policies. A general management plan is not needed to address management of illegal activities or to enforce existing laws and policies within a unit of the national park system.

Mitigation measures included on page 126 of the general management plan are general actions the National Park Service will commit to taking. More specific measures will be part of future compliance.

Comment: A commenter expressed concern about the impact topics that were not analyzed in the document. The concern

focused on resources described in the park’s significance statements, and specific resources in the park that were not analyzed, such as aquatic life and ethnographic resources.

Response: Consistent with the National Environmental Policy Act and related guidance and Director’s Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-making, an environmental impact statement analyzes only those resources that may be affected if the proposed actions or alternatives are implemented. Similarly if a specific resource would not be affected or the impacts would be negligible (the impact is low or not detectable) the impact topic would be “dismissed.” Rationale for dismissal is provided under the section “Impact Topics Considered But Not Analyzed In Detail.” The screening processes to determine if an impact topic is retained or dismissed are applied equally to all resource topics regardless of their importance or relationship to park purpose and significance.

Additionally, an impact topic would be retained only if it would be impacted by the proposed actions. For example, while water levels in the lake have been fluctuating, none of the proposed actions in the draft general management plan would influence water levels. It is true that aquatic life has been impacted by fluctuating water levels in the lake. However, because the fluctuating water level is not a proposed action in this general management plan, the effects of water level change were not analyzed.

Comment: A commenter stated that a listing of the structures and buildings in the parks has not been included.

Response: Historic buildings and structures within the parks are discussed on page 170-171 of the draft general management plan. Other NPS facilities are discussed on page 181-182 of the draft general management plan. A comprehensive listing of the structures

and buildings in the parks would not add appreciable value for a general planning effort of this nature.

Comment: A commenter stated that visitors are more likely to encounter wildlife when exploring the semi-primitive areas and questioned if there are any habitats that should be protected.

Response: Areas that would be sensitive to disturbance were considered and avoided when the action alternatives were zoned.

Comment: One commenter questioned if the deferred maintenance items constitute conditions that adversely impact monument resources.

Response: Deferred maintenance refers to maintenance activities for assets in the park that were not performed when scheduled. Assets include infrastructure such as buildings, docks, roads, trails, and interpretive waysides. No monument resources would be affected by the completion of deferred maintenance to existing assets.

Comment: One commenter expressed concern that the use of information technologies would erode the visitor experience. The comment stated that these technologies suggest that this virtual experience could reasonably replace a park experience. The commenter felt this would diminish a sense of responsibility to protect, restore, and take onsite actions to preserve our heritage. The commenter expressed further concern that using GPS devices to facilitate exploration in semi-primitive areas of the recreation area would pose a looming threat to the national monument and its resources, with many potentially severe adverse impacts.

Response: As noted previously, the “User Capacity” section of the draft general management plan describes the process for managing visitors to maintain desired conditions and to avoid unacceptable impacts within the parks. GPS technologies would not direct visitors to

sensitive areas or places where use is not desired. In many national park units, information technologies are effectively used to enhance visitor understanding and enjoyment while protecting important park resources. The National Park Service does not believe the use of information and digital technologies would result in severe adverse impacts to resources.

Comment: A commenter stated that alternatives 1 and 2 do not include restoration of the McBride Ranch House and feared it will be vulnerable to deterioration and that its integrity would be impacted.

Response: Regardless of which alternative is implemented, park resources must be managed according to law and NPS policy, which includes the protection of cultural resources. The McBride Ranch House has been stabilized and is not currently deteriorating.

Restoration has a particular meaning and it is important to note that the National Park Service would not be restoring the McBride House under alternative 3. As stated on page 94 of the draft general management plan, the house would be rehabilitated in accordance with *The Secretary of the Interior’s Standards for the Treatment of Historic Properties*, which would involve some restoration elements but would also allow limited modifications to allow adaptive use of the property for interpretation. It would then be opened for guided tours during special events in the summer. At all other times, the house would be locked and protected with fencing.

Comment: One commenter stated that alternative 3 restricts the public because when the lake returns to normal levels after this drought is over, visitors will want to use the lake again.

Response: The preferred alternative provides a broad range of visitor experiences and opportunities. The areas designated as the water-based, no-wake zone and semi-primitive zone in the preferred alternative would help ensure

adequate opportunity for both motorized and non-motorized recreational experiences throughout the national recreation area.

Comment: A commenter noted that creating a no wake zone is a good idea, but the proposed location is dangerous because the wind would create massive swells. The commenter suggested moving the no wake zone to South Canyon where there is already a no wake zone and it is protected from the prevailing wind.

Response: Although shown on the alternatives maps as a static line, as noted on page 95, areas in the zone would vary in size and extent based on fluctuating lake levels and conditions.

Comment: Several commenters stated there is no discussion of the importance of maintaining a specific historic/cultural landscape in the national recreation area and national monument. Viewsheds from the site are a very important consideration also.

Response: Cultural landscapes are important resources in the national recreation area and the national monument. The draft general management plan emphasizes their protection through research, inventorying, planning, and mitigation.

The preferred alternatives state that cultural landscape inventories and reports would be conducted as necessary to document cultural landscapes that may exist in association with historic sites. Future actions to design, site, and construct facilities would be done in a manner that avoids or minimizes visual intrusions on natural and cultural resources and landscapes.

There are no historic landscapes to be managed at Alibates Flint Quarries National Monument.

As mentioned on page 46 of the draft general management plan, the National Park Service would work with landowners and energy developers to minimize

impacts on scenic views and may be able to provide information on how to avoid or mitigate impacts on other important natural and cultural resources.

Comment: One commenter expressed concern that the comprehensive planning effort did not include a professional cultural resources specialist on the planning team.

Response: The planning team included several cultural resource specialists, including Steve Whissen, a Denver Service Center National Park Service employee, and Seth Wilcher, a member of the consulting team. In addition, several cultural resource specialists outside the planning team were consulted during early planning stages. Biographic summaries for Steve Whissen and Seth Wilcher will be included into the errata sheet for the abbreviated final.

Comment: Several commenters expressed concern that the planning effort does not contain sufficient detail regarding baseline data or monitoring methods for addressing impacts over time to the known cultural resources of the two parks.

Response: Consistent with Director's Order #12, when preparing National Environmental Policy Act compliance documents, the affected environment and impact analysis focus only on those resources that would be impacted by the proposed action. Day-to-day management of cultural resources within both park units would continue to comply with existing laws and policy and as such, baseline data and monitoring of these resources was not discussed in the general management plan.

Table 26 describes the servicewide policies used to manage all national park units. Policies related to cultural resources are discussed starting on page 282 of the draft general management plan. The parks would continue to uphold these requirements preventing the degradation of cultural resources within the parks.

Comment: One commenter stated that the document discusses trail erosion but does not consider impacts of trails on cultural resources. The commenter requested additional discussions regarding impact assessments of trails to cultural resources.

Response: The only trail that would be constructed under the general management plan is a self-guided trail around the Alibates Flint Quarries National Monument visitor contact station. This area has previously been disturbed and the new trail would not impact any cultural resources. Because trail construction or modification was not part of the proposed action in areas that would impact cultural resources, the impact of trail erosion on cultural resources was not analyzed in the general management plan.

Comment: One commenter stated that the document indicates the National Park Service

regards the collection/removal of as much as 5% of flint per 500 visitors from samples of sites as an acceptable management practice.

Response: This statement is within table 4 in the “User Capacity” section of the draft general management plan. The standard relates to designated sample sites that are about 1m x 1m square and do not contain a great deal of flint, so 1% of flint per 500 visitors is a small quantity of flint. To specifically address this comment, the standard was updated to put a limit on the total amount of flint loss per designated sample site. This standard will help the park staff assess if there is a pattern of loss occurring at any specific site or generally across the park, and therefore identify changes needed to existing visitor use management strategies (e.g., visitor education, type and amount of access).

DRAFT GENERAL MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT CORRECTIONS

This section contains those changes that should be made to the draft general management plan / environmental impact statement. Some of these changes are a result of public comments while others are editorial in nature.

Pages vi, ix, 58, 93, 100, 141, 145, 221, and 236 – Use of the term “scuba targets”

- Please replace the term “scuba targets” to “underwater features” throughout the text.

Page 63 – Table 4: Summary of User Capacity Indicators, Standards, and Potential Management Strategies

- Please replace the text in the ‘Standard’ column with the following: “No more than 1% of flint removed from a sample site per 500 visitors and no more than 5% loss at any designated site.”

Page 100 – Table 8: Essential One-time Capital Costs for Alternative 3.

- Please replace the dollar amount listed for interpretation/trails and access in table 8 with \$725,500.

Page 136 – The McBride Ranch House

- The text current states, “The McBride Ranch House would be restored under alternative 3.” Please replace this sentence with the following: “The McBride Ranch house would be rehabilitated under alternative 3.”

Page 251 – List of Preparers, Denver Service Center

- The following biography should be added, “Steve Whissen, Cultural Resources Specialist / Planner. Responsible for review of the cultural resource sections of the document. Has 23 years of experience with the National Park Service. Has an M.A. in historic preservation.”

Page 251 – List of Preparers, Consultants

- The following biography should be added, “Seth Wilcher, Cultural Resource Specialist at Parsons: Responsible for initial planning and consultation regarding cultural resources at the parks. Has 10 years of experience. Has a B.A. in history / education and an M.H.P in historic preservation.”

LAMR / ALFL Final GMP/EIS: Additional text related to climate change and costs

All page numbers refer to the Draft GMP/EIS.

Pg. 45; Implementation of the Plan, insert before last sentence of the first paragraph

New text:

For example, precipitation and flood events are projected to be more extreme even as drought conditions persist or get worse. The National Park Service may conclude, after analysis of the best scientific information available, that certain elements of the GMP requiring significant financial investment would be unwise to pursue.

Pg. 121-122; Cost Summary of Alternatives; first column, insert before last sentence of last paragraph

New text:

Lake Meredith National Recreation Area and Alibates Flint Quarries National Monument are located in a region that is subject to severe droughts and extreme weather events. The action alternatives propose a range of actions to address, in part, the operational challenges associated with these environmental challenges including management of infrastructure. For this reason, the National Park Service will integrate relevant information, including data related to environmental change, into future planning and decision-making processes. For example, the National Park Service would evaluate proposed facility investments prior to project approvals to ensure the long-term sustainability of these investments. These evaluations would include analysis of the best scientific information available. If the evaluation shows that the financial investment would be at risk, the National Park Service could either modify the action to increase sustainability of the project or, if no alternatives exist, terminate the action.

Pg 290, National Park Service Operations, add to list of actions

New text:

Develop adaptation strategies to improve management of park resources and assets based on climate change projections to and scenarios.

Pg 293, Sustainable Design and Development Table, add to list of actions

New text:

Identify key natural and cultural resources, processes, and park facilities that are at risk from the effects of climate change.

AGENCY AND ORGANIZATION LETTERS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

May 21, 2013

Lake Meredith National Recreation Area,
Alibates Flint Quarries National Monument General Management Plan
National Park Service
Denver Service Center-Erin Flanagan
P.O. Box 25287
Denver, CO 80225

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS)/General Management Plan (GMP) for the Lake Meredith National Recreation Area (LMNRA) and Alibates Flint Quarries National Monument (AFQNM) prepared by the National Park Service (NPS). The purpose of the proposed action is to analyze potential management alternatives for the LMNRA and AFQNM for the next 15-20 years.

EPA rates the DEIS as "EC-2" i.e., EPA has "environmental concerns and requests additional information" in the Final EIS (FEIS). The EPA's Rating System Criteria can be found here: <http://www.epa.gov/oecaerth/nepa/comments/ratings.html>. The "EC" rating is based on potential impacts to natural, cultural, and park resources. The "2" indicates the DEIS does not contain sufficient analysis and information concerning abandoned oil and gas operations, fish and wildlife resources, and cultural resources. Detailed comments are enclosed with this letter which clearly identifies our concerns and the informational needs requested for incorporation into the Final EIS (FEIS). Responses to comments should be placed in a dedicated section of the FEIS and should include the specific location where the revision, if any, was made. If no revision was made, a clear explanation should be included.

EPA appreciates the opportunity to review the DEIS. Please send our office two copies of the FEIS, and an internet link, when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20004. Our classification will be published on the EPA website, www.epa.gov, according to our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. If you have any questions or concerns, I can be reached at 214-665-8006, or contact Keith Hayden of my staff at hayden.keith@epa.gov or 214-665-2133.

Sincerely,

A handwritten signature in blue ink that reads "Rhonda Smith".

Rhonda Smith
Chief, Office of Planning
And Coordination

Enclosure

**DETAILED COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
LAKE MEREDITH NATIONAL RECREATION AREA AND ALIBATES FLINT
QUARRIES NATIONAL MONUMENT**

BACKGROUND: Lake Meredith was originally created by the construction of Sanford Dam on the Canadian River in 1965, and referred to as the Canadian River Project. The Dam and Lake were designed to provide water for cities in the Texas panhandle. In 1968, the Bureau of Reclamation turned over operation and maintenance of the Sanford Dam and facilities to the Canadian River Municipal Water Authority (CRMWA). The area was established as the Lake Meredith National Recreation Area under the jurisdiction of the National Park Service (NPS) in 1990 with the intent to provide public access to diverse land- and water-based recreational opportunities. Today, the Lake Meredith National Recreation Area occupies portions of Moore, Hutchinson, Potter, and Carson counties. The recreation area is over 44,900 acres and the lake is the largest body of freshwater in the Texas panhandle. Although its management has been guided by a master plan and statement for management, a general management plan has not previously been prepared for this national park unit.

Alibates Flint Quarries National Monument (AFQNM) was established by Congress in 1965 to provide for the preservation, protection, interpretation, and scientific study of Alibates flint deposits. The national monument is on the eastern edge of the LMNRA and the two NPS are managed jointly. A management plan for the national monument was prepared by the NPS in 1976 and amended in 1985, but it does not meet the requirements of a general management plan and is out of date.

CHAPTER 2: ALTERNATIVES

Table 7: Summary of Costs for Alternative 3, Page 100

The dollar amount listed for total one-time capital costs in table 7 appears to be incorrect. This number is supposed to reflect the one-time capital costs for both essential and desirable projects, but only reflects the cost for essential projects.

Recommendation:

- Please amend the dollar amount in table 7 to reflect total one-time capital costs for both essential and desirable projects.

CHAPTER 5: CONSULTATION AND COORDINATION

Section 7 Consultation for Threatened and Endangered Species, Page 246

The DEIS reached a conclusion that the proposed action “may affect, but is not likely to adversely affect” threatened or endangered species. The documentation to support this statement was not included in the DEIS.

Recommendation:

- Include all correspondence with the United States Fish and Wildlife Service (USFWS) in the FEIS. The USFWS needs to concur with the determination reached in the DEIS that the proposed action “may affect, is not likely to adversely affect” threatened or endangered species.

Section 106 Consultation, Page 246

The DEIS reached a conclusion that cultural, historic, or archeological resources in the AFQNM will be adversely affected as a result of excavation. The documentation to support this statement was not included in the DEIS.

Recommendation:

- Include concurrence and consultation from consulted tribes, the Advisory Council on Historic Preservation, and the Texas State Historic Preservation Officer in the FEIS. Also, please contact the Oklahoma and New Mexico SHPO's to see if they have any information to offer regarding potentially affected tribes that may now reside within the boundaries of their respective states. The FEIS should describe mitigation measures the NPS will undertake to minimize impacts to cultural, historical, or archeological resources.

GENERAL COMMENTS RELATED TO OIL AND GAS DEVELOPMENT

Existing and Abandoned but not Reclaimed Wells

Many of the resource areas dismissed from detailed analysis in the Draft GMP/EIS were discussed in the 2002 Oil and Gas Management Plan (2002 Plan) for Lake Meredith. The 2002 Plan is referenced in many areas of the Draft GMP/EIS as providing assurance that oil and gas operations will not adversely affect resource areas. In the 2002 Plan, 674 acres of existing and abandoned, but not reclaimed, operations were determined to have continued adverse effects to air resources, floodplains and water resources, geologic resources, paleontological resources, vegetation, wetlands, fish and wildlife resources, visitor use and experience, and cultural resources. There was no quantitative or qualitative analysis accompanying this statement in the 2002 Plan, and no remedies for the adverse impacts were included in the Plan. In the NPS response to EPA's comments contained in the Final 2002 Plan, NPS stated they did not have the regulatory authority to require operators of abandoned oil and gas facilities to clean up their abandoned sites. While the NPS does not have the regulatory authority to require operators to perform reclamation of areas abandoned prior to the establishment of the Non Federal Oil and Gas Rights Regulations¹, this does not exempt NPS from analyzing the effects that existing or abandoned oil and gas operations have on the environment.

Recommendation:

- Include a detailed discussion for all resource areas that were considered adversely affected by existing and abandoned oil and gas operations in the 2002 Plan. Provide a quantitative or qualitative analysis of how each resource area was, and is currently, adversely affected. Examples of information needed to quantify adverse effects could include surface or groundwater quality monitoring data, areal extent of vegetation disturbance, etc. If the existing and abandoned operations are not currently adversely affecting resources, please include a discussion of how the effects were mitigated.

Oil and Gas Maps

The GMP/EIS does not include any mapping of current or abandoned oil and gas operations within the National Recreational Area or National Monument.

Recommendation:

- Include maps that delineate current and abandoned oil and gas operations. Include other relevant information in the maps that could be affected by oil and gas activities, such as drinking water supplies and recreational areas.

¹ 36 C.F.R. §§ 9.30 – 9.52

Robert Maguire
Superintendent
Lake Meredith National Recreation Area
Alibates Flint Quarries National Monument
P.O. Box 1460
Fritch, Texas 79036-1460

Dear Superintendent Maguire:

The AMA is writing to you regarding Lake Meredith's draft environmental impact statement published in the Federal Register on April 1 [FR DOC No: 2013-01434].

The notice of availability is to allow public comments on the draft environmental impact statement. The AMA opposes alternatives 2 and 3 because they would create new, large rural and semi-primitive zones. Off-highway-vehicle use would be restricted in these areas.

According to the National Park Service's preferred plan (alternative 3), the NPS intends to encourage non-motorized activities in semi-primitive areas. During this time of tight budgets, shifting resources to these areas will affect the other modes of recreation in the park, including OHV use.

I have serious concerns that the DEIS does not fully take into account the social and economic costs of limiting access for responsible OHV riders. Furthermore, one of the stated goals of the DEIS is to provide a better visitor experience. I do not believe the NPS is taking into account the large number of OHV users who visit the Lake Meredith National Recreation Area.

The preferred alternative 3 will emphasize non-motorized recreation while, at the same time, limiting the areas available for responsible OHV use. Thus, this DEIS unfairly focuses on non-motorized recreation opportunities.

Thank you for your time and consideration of our comments.

Sincerely,

Wayne Allard
Vice President, Government Relations



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

NPS/LAMR/618/124545B JULY 2014



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