

## CHAPTER SIX: RESPONSE TO PUBLIC COMMENT

### Introduction

In January 2003, Big South Fork National River and Recreation Area released its *Supplemental Draft General Management Plan and Environmental Impact Statement*. A notice of availability was published in the *Federal Register* by the Environmental Protection Agency on February 14, 2003 (Volume 68, Number 31, Page 7536). Public review occurred from February 12, 2003 through May 15, 2003, a period of 92 days. A series of four open houses were held in March 2003 to take questions from the public and receive comments on the plan; these were held in Huntsville, Wartburg, and Allardt, Tennessee, and Whitley City, Kentucky.

### The Role of Public Comment

The National Environmental Policy Act (“NEPA”) requires that the National Park Service solicit public comment on draft plans for major proposed actions. Further, the National Park Service must “assess and consider [the resulting public] comments both individually and collectively.” Public comments are viewed by the National Park Service as critical in helping park managers to shape responsible plans for our national parks that best meet the Service’s mission the goals of NEPA, and the interests of the American public.

NEPA and NPS policy require that NPS provide a written response to all “substantive” comments. As defined in the National Park Service’s NEPA guidance (Director’s Order # 12) and based on Council of Environmental Quality Regulations, a substantive comment is one that:

- Questions, with reasonable basis, the accuracy of the information in the environmental impact statement
- Questions, with reasonable basis, the adequacy of the environmental analysis
- Presents reasonable alternatives other than those presented in the environmental impact statement
- Causes changes or revisions in the proposal

Nonsubstantive comments include those that simply state a position in favor of or against the proposed alternative, merely agree or disagree with National Park Service policy, or otherwise express an unsupported personal preference or opinion.

To “assess and consider” the public comments on the *Supplemental Draft* received between February 12, 2003 and May 15, 2003, all letters, e-mails, faxes, comment forms, and transcripts of public meeting testimony were read and analyzed by NPS staff from both the National Area and the Southeast Regional Office. During the process of identifying public concerns, all comments were treated equally – they were not weighted by organizational affiliation or other status of respondents, and it did not matter if an idea was expressed by dozens of people or a single person. Emphasis is on the content of a comment rather than who wrote it or the number of people who agree with it.

All substantive comments identified by the planning team are included in this section, whether submitted by one person or many people. The process is not one of counting votes, and no effort was made to tabulate the number of people for or against a certain aspect of the *Supplemental Draft*. The purpose of the NEPA process is to prepare a final *General Management Plan/EIS* for the National Area that meets the mission of the National Park Service and the National Area’s enabling legislation and best serves all the people.

Due to space and budgetary constraints, NPS cannot print and respond individually to each letter containing substantive comments, apart from those submitted by governments and government agencies. Instead, we have developed a series of comment statements that incorporate all of the substantive comments received from the public during the public comment period. These comment statements are set forth below, together with NPS’ response. Please note that each public comment statement reflects specific comments raised by one or more commenters. Also included are a number of non-substantive comments that were raised with some frequency by commenting groups or individuals. NPS has included responses to these nonsubstantive

comments in order to clarify both the plan and the legal mandates that NPS is required to follow in managing the National Area

## Comments



### FENTRESS COUNTY GOVERNMENT

JOHN B. MULLINIX, COUNTY EXECUTIVE

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Jamestown, TN 38556

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931-879-7713  
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May 12, 2003

Superintendent  
Big South Fork National River & Recreation Area  
National Park Service  
4564 Leatherwood Ford Road  
Oneida, Tennessee 37841

Dear Superintendent Detring,

As County Executive of Fentress County, one of the major Tennessee counties comprising the Big South Fork National River and Recreation Area, I appreciate the opportunity to comment on the January 2003 Supplemental Draft General Management Plan and Environmental Impact Statement.

**G1**

Fentress County, as you are aware, suffers from a lack of good employment opportunities for our citizens. We feel one of the major reasons for this project was to benefit our economically-depressed region. The legislation authorizing Big South Fork states, "The National Area shall be established **and managed** for the purposes of preserving and interpreting the scenic, biological, archeological, and historical resources of the river gorge and developing the natural recreational potential of the area for the enjoyment of the public and for the benefit of the economy of the region." So, not only was the Area established for these purposes, it is also required that the National Park Service **manage** the Area for these purposes, including benefiting the economy of the region. I feel the legislation is clear that Congress intended this to be **active management**.

And as such, it is important that a General **Management** Plan for Big South Fork provide a blueprint for the future. **A blueprint for how the National Park Service intends to actively manage the Area to benefit the economy of the region.**

Superintendent Detring, I do appreciate that the National Park Service must follow numerous pieces of legislation in operating Big South Fork. Preservation of scenic beauty is a necessity, as that is what draws tourists to our county.

**G2**

But I am disappointed this Draft General Management Plan essentially says the NPS intends to fail at benefiting our economy. On page 142 of the draft, **all** the alternatives presented in this plan have "negligible to minor impacts to region." From my viewpoint,

## Responses

### Fentress County Responses

**G1.** (Reader Note: the following comment response is the same as the response to Scott County comment G15). This comment from Fentress County states that the National Area is supposed to benefit the economy of the region. This statement reflects Section (e)(1) of the enabling legislation, which says,

*The National Area shall be established and managed for the purposes of preserving and interpreting the scenic, biological, archeological, and historical resources of the river gorge areas and developing the natural recreational potential of the area for the enjoyment of the public and for the benefit of the economy of the region.*

Taken in context, this statement says that NPS must preserve and interpret resources and develop the natural recreational potential of the area for public enjoyment and for economic benefit. The GMP complies with this important mandate by proposing a system of management zones that provide for future recreational development and preservation and interpretation of resources. The GMP also outlines a system of roads and trails that provide the various users of the National Area – hikers, mountain bikers, equestrians, and drivers – ample recreational opportunities while protecting the values that make the area attractive to visitors.

To assist in planning, NPS completed a detailed economic analysis to quantify the benefits of the National Area to the economy of the region (Fentress, Scott, McCreary, Morgan, and Pickett Counties). With the aid of the *Money Generation Model*, developed by economists at Michigan State University, NPS determined:

- Wages, salaries, rents and profits generated by non-local tourists to the region generate about \$7 - \$13 million annually.
- The National Area pays its employees \$2.9 million each year in salaries and benefits, much of which returns to the local economy.
- The National Area pays \$75 thousand per year in utilities
- The National Area buys \$150 thousand in supplies locally each year
- The National Area receives tens of thousands of dollars each year in special project funding that often returns to the local economy.

All told, the economic benefit to the region from National Area payroll, spending, and tourism totals \$10 - \$16 million annually.

## Comments

the alternatives presented here are virtually identical, just minor variations of the same no-development theme. In fact, given the removal of motorized recreation from many areas, the new restrictions on horseback riding and bicycling, and the closing of old roads that provide access, it is doubtful the impacts of any of these plans is even positive to recreation and hence an overall negative to benefiting the economy of Fentress County.

G3

The authorizing legislation speaks of **preserving** scenic beauty. It does not require that Big South Fork be converted to a state of "wilderness," such as through closing old roads that provide recreation access and allowing them to revegetate, as planned in this draft.

The citizens of our county certainly want to see the scenic beauty of the Big South Fork preserved. However, the key word here is **see**. To observe and protect the beauty of the Area, we must have trails, access, and sufficient development to showcase and protect this beauty. I do not believe the current range of alternatives can achieve this goal.

First and foremost, we must see visitation grow.

G4

Therefore, my major comment on the draft is that the alternatives presented are far too narrow in range. The original concept of development of the Big South Fork is totally abandoned, and even a moderate level of development was rejected in this draft. This is simply not acceptable. My understanding of your regulations is that a full range of viable alternatives should have been considered and presented. The alternatives in this draft are really just a set of subalternatives, not a wide range of alternatives designed to allow the public to understand all the major issues involved in the future of Big South Fork.

And I think each alternative should be **fully evaluated** on all the project goals, not in-depth just on resource preservation. The alternatives must also receive substantial quantitative analysis of the impacts on recreation and benefiting the economy, based on hard data and preferably modeling. We as a region and a nation should seek to maximize our utilization of this great resource. Therefore, we think the NPS must develop alternatives that attempt to maximize **all** the legislative requirements for the National Area.

We see our economic future of Fentress County as closely tied to BSF recreational opportunities and the manner in which BSF's outstanding natural features are presented and made available to the public. Even though Fentress County contains some of the most strikingly beautiful natural features in the entire Big South Fork National Area, these are not made readily available to the public.

G5

A Fentress County businessperson, Mr. Robert Livingston, has shown me an outline for a development along Darrow Ridge that would showcase examples of what makes the Big South Fork area so special. We feel that presenting the best of Big South Fork in a short drive to all our tourists, especially those of limited mobility (the elderly, families with small children, and persons with varying degrees of physical handicaps) is a great solution for benefiting the county while insuring these features are protected by suitable development. I respectfully ask that you formulate an alternative that presents the essential elements of Mr. Livingston's presentation to the Park Service in future versions of the plan.

## Responses

In the Supplemental Draft GMP, these benefits were characterized as a “minor” impact to the local economy, a statement that has been misunderstood. That analysis simply looked at the *relative difference* in economic benefits between the various alternatives. The county and others have requested an analysis showing how the National Area currently affects the local economy combined with the additional benefit of the preferred alternative. Therefore, the GMP has been revised to show the overall net effect of the National Area on the local economy – both currently and after the implementation of the preferred alternative. The analysis indicates that the current benefits are substantial, as indicated above.

Moreover, an additional \$3,900,000 in annual operating funds, over and above amounts spent to construct new facilities, would be needed to fully implement the Preferred Alternative. If forthcoming, this level of increased annual operating expenditures, when combined with higher levels of tourism that may occur as a result of implementing the Preferred Alternative, would result in a significant increase in annual economic benefits to the local and regional economy.

**G2.** Each of the alternatives contained in the GMP is based on a different concept of how the National Area should be managed. These concepts are in turn reflected in the management zones and prescriptions applied to specific parts of the National Area. The management zones constitute the essence of each alternative, because it is these zones that will govern what actions can, and cannot, be contemplated in subsequent planning efforts. The zone maps are the heart of each alternative.

The three alternatives in the GMP differ significantly in their approach to management zoning. For example, Alternative B would zone substantially more of the plateau area as “enhanced recreation unit” than would Alternative A. Alternative D differs from Alternatives A and B by creating an entirely different zoning system, consisting of seven separate zones and an ATV planning area. Each of the alternatives differs fundamentally in its approach to management of the National Area.

**G3.** Although a number of existing “social” trails are not included in the official system, their exclusion has been determined necessary, after careful consideration by park staff, due to unacceptable adverse resource impacts. Many stretches of trail at the National Area cross erosion-prone soils, enter streams, or traverse wetland areas. In determining whether to include individual trails in the official system, NPS had to balance visitor use against a mandate from Congress to protect resources at the National Area from adverse impacts.

## Comments

**G6**

The subject of management zones is a difficult one for us to comprehend. To our citizens, this seems mostly an internal tool for the Park Service. However, we do have a couple of comment on zones. If one examines a map of Big South Fork, there is an obvious fact we do not see presented in your discussion of zones. Sections of the National Area (to the northwest) are bordered by public lands, Pickett State Forest and Daniel Boone National Forest. To the south, especially Darrow Ridge and Mt Helen, the park is bordered by private land. Here, residential and commercial development related to Big South Fork is already taking place. It would seem desirable to us that these major differences in outside development potential be recognized in the zone system. Obviously, those sections of the National Area bordered by public lands will have different challenges in the future than those adjacent to growing residential development. Not recognizing the inevitability of development in these areas (especially Darrow Ridge, which is surrounded by developing residential neighborhoods oriented toward the park) is a major oversight. We respectfully request that zoning specifically address the differences in outside (private) development potential, as these regions will require a higher level of development and trail density to preserve natural features and a quality experience for visitors.

**G7**

Another point is that only one of the alternatives presented in the draft has “detailed” zones. Then that alternative is selected as preferred because it is “detailed.” That seems like circular reasoning, or predetermining the outcome of the plan. If detailed zoning is a requirement (or highly desirable) it should be presented in more than one alternative. Perhaps one detailed zoning plan with a high level of development, contrasted with the present detailed plan with very little development. This would allow a much fairer presentation of alternatives.

Lastly, I want to mention the importance of the O&W Railbed along North White Oak Creek and Zenith. We are pleased to see these areas addressed in the plan. Improving the O&W by replacing the bridges and repairing the surface will provide a great opportunity to observe and enjoy the scenic beauty of North White Oak. The trail improvements would allow family bicycling and walking, pursuits that are now difficult due to the crossings and the poor surface, and would also allow horseback riders to have a better and safer experience than at present.

Zenith is not well-utilized now. A beautiful recreation area at Zenith will be significant addition to our county. We would like to see this area turned into an attractive stop for tourists, benefiting the southern area of the park.

We are convinced proper design, implementation, and maintenance of recreation facilities are paramount to the future of a successful Big South Fork. These efforts should combine to provide great access to the public in our county.

## Responses

**G4.** The recreational opportunities provided by the plan are comparable to, and in some instances exceed, those provided by most other national park units in the Eastern United States. To the extent that lodges or other similar facilities are desired, NPS believes that it would be more beneficial to the economy of the local area if these were to be provided by local business people outside the National Area (as opposed to being controlled by concession contractors who, most likely, would be from a distant metropolitan area, with only a few minimum-wage jobs available to local residents). NPS agrees that economic modeling is important. As stated in Fentress County response G1, the economic impacts of the Preferred Alternative have been assessed using the *Money Generation Model*, which is a standard modeling tool used by NPS to gauge the likely economic impacts of planning proposals. The Money Generation Model indicates that the economic benefit to the region from National Area payroll, spending, and tourism totals almost \$10-16 million annually.

**G5.** While preparing the Supplemental Draft GMP, NPS gave extensive consideration to land use plans and proposals in the surrounding region, including Mr. Livingston's development plans for Darrow Ridge. Many of Mr. Livingston's recommendations are reflected in the plan: the preferred alternative includes nine new proposed access zones (trailheads) in the Darrow Ridge vicinity, and it provides equestrian and/or hiking access to Wildcat Den, Hippy Cave (aka. Accordion Bluff), the Sawtooth area, Fiddler's arch, and the Tophat (aka. Flat Bottom Overlook). In addition, the GMP has been revised to reflect the following changes in the Darrow Ridge area:

- Little Cliff Trail – open to horses and bicycles
- Darrow Ridge Road (eastern portion), Christian Cemetery Road, Little Cliff Road (to gorge closure), and Upper Panther Branch Road – designated as multiple-use trails instead of roads to allow equestrian use
- Darrow Ridge Road (western portion) – road standard changed to “2-lane paved”
- John Hall Trailhead – designated for horses and hikers as a second access to the Darrow Ridge Horse Trail

There are some aspects of Mr. Livingston's proposal, however, that are not necessary and appropriate for a high quality visitor experience. Additional development and facilities to the degree requested would impact sensitive resources and detract from the rustic character of the National Area.

## Comments

G8

While I could make numerous comments on the details of the draft, my position is that the range of alternatives presented is so narrow and the analysis of impacts on recreation and the economy so speculative that a new draft document must be formulated, with a more reasonable range of alternative directions for the future of Big South Fork. We also request that a strong effort be made to analyze and maximize the economic benefits of the Big South Fork through enhancing recreation. **At an absolute minimum, at least one alternative must have a discernable positive effect of the economy of the region.**

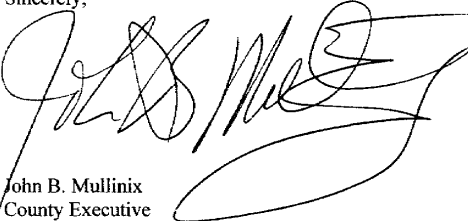
In closing, I would also like to point out there are many aspects of the draft that do benefit Fentress County, and thank you and your staff for formulating the new access points, which are vital, and the designation and future upgrading of the most-used customary trails in the Darrow Ridge region and the Laurel Creek area north of Leatherwood Ford Road. I realize that you are faced with a number of constituencies with widely varying views of the future of Big South Fork. It is a difficult position. As county executive, I appreciate that not everyone will be happy with the outcome of decisions. I want you to know that we appreciate you, a resident of Fentress County, and hope to work with you and your staff to provide a great future for the park.

G9

We in Fentress County have been remiss in participating in the planning of Big South Fork in the past. I apologize for that. We intend to do better. In the future, I would like to offer myself as County Executive, our Chamber of Commerce head, Mr. Scott Sandman, and Mr. Robert Livingston, a leader in the business community, to be involved in the formulation of future park planning efforts.

Thank you for the opportunity to comment on this January 2003 Supplemental Draft GMP/EIS. We ask that you address the above concerns and include the additional alternatives and data we have requested in a revised draft GMP/EIS.

Sincerely,



John B. Mullinix  
County Executive  
Fentress County, Tennessee



## Responses

**G6.** Zoning in NPS general management plans is driven principally by resource conditions (present conditions and desired future conditions) within the unit boundary. However, anticipated future demand for recreational facilities will affect zoning. In the case of Fentress County, the Preferred alternative includes 13 new proposed access zones (trailheads) along the boundary of the National Area – nine in the Darrow Ridge area alone – in an attempt to meet growing development pressures. No other section of the National Area contains as many new proposed access zones. The official roads and trails plan for this area is intended to include enough opportunities to simultaneously meet demand and direct usage to those areas most capable of sustaining recreational use over the long term. NPS believes that increasing trail density over what is included in the plan could create more resource damage, rather than less, and will adversely affect the visitor experience by diminishing the natural ambience and rustic character that draws visitors to the area.

**G7.** Each of the three action alternatives in the plan contains a similar amount of detail with respect to the fundamental elements of a general management plan, namely, management zones, desired future conditions, management prescriptions, and environmental consequences. The management zones for Alternatives A and B were carried forward from the February 2000 Draft GMP and incorporated by reference into the current document – their descriptions can be found in the Appendix. Alternative B contains a much higher level of development than the other alternatives. The Supplemental Draft GMP goes beyond the standard GMP format and includes a roads and trails plan. Each of the action alternatives contains a detailed proposal for a roads and trails system. The Preferred Alternative has been selected because its zoning system provides the greatest management guidance and resource protection.

**G8.** Please see responses to Fentress County comments G1, G4, and G7.

**G9.** NPS looks forward to working with the county in implementing the final plan and engaging in future management of the National Area.

## Comments

### Office of County Executive

2845 Baker Highway  
P.O. Box 180  
Huntsville, Tennessee 37756

Scott County, Tennessee  
Dwight E. Murphy  
scottexec@highland.net

(423) 663-2000  
(423) 663-2355  
Fax 663-3803

April 22, 2003

Reed E. Detring  
Superintendent  
United States Department of the Interior  
National Park Service  
Big South Fork National River and Recreation Area  
Obed Wild and Scenic River  
4564 Leatherwood Road  
Oneida, Tennessee 37841

Dear Superintendent Detring:

You will find enclosed resolutions numbers 17 and 18 that were adopted by the Scott County Board of Commissioners in their regular session on April 21, 2003. These resolutions should be treated as Scott County Government's comments concerning the Draft General Management Plan.

G10

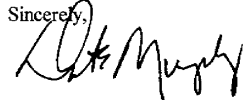
As County Executive, I am greatly concerned about the lack of potential economic growth that the preferred alternative plan offers. It seems all of the plans forget that the original intent of the legislation was to stimulate economic growth for the area. Horse trails, ATV trails, hunting and other forms of recreation should be encouraged rather than discouraged by any alternative you adopt.

G11

As a County, we stand totally opposed to any plan that would limit vehicular traffic on any portion of the O & W Railroad Bed that is in ownership of Scott County. It is our belief that this roadbed has great potential for future economic development. We also believe that the O & W offers access to the gorge area for the handicapped and senior citizens.

In closing, please include the two resolutions and this letter in the comment portion of your review. If you have any questions, please feel free to contact me at 423-663-2000.

Sincerely,



Dwight E. Murphy  
Scott County Executive

BIG SOUTH FORK NRRA OBED WSR			
MAY 1 2003			
Act.	Info.	Init.	Date
<input checked="" type="checkbox"/>	SUPT.		4/22/03
<input checked="" type="checkbox"/>	ASST SUPT.		4/22/03
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## Responses

### Scott County (April 22, 2003)

**G10.** (Reader Note: the following comment response is the same as the response to Fentress County comment G1). The comment from Scott County states that the National Area is supposed to benefit the economy of the region. This statement reflects Section (e)(1) of the enabling legislation, which says,

*The National Area shall be established and managed for the purposes of preserving and interpreting the scenic, biological, archeological, and historical resources of the river gorge areas and developing the natural recreational potential of the area for the enjoyment of the public and for the benefit of the economy of the region.*

Taken in context, this statement says that NPS must preserve and interpret resources and develop the natural recreational potential of the area for public enjoyment and for economic benefit. The GMP complies with this important mandate by proposing a system of management zones that provide for future recreational development and preservation and interpretation of resources. The GMP also outlines a system of roads and trails that provide the various users of the National Area – hikers, mountain bikers, equestrians, and drivers – ample recreational opportunities while protecting the values that make the area attractive to visitors.

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- Wages, salaries, rents and profits generated by non-local tourists to the region generate about \$7 - \$13 million annually.
- The National Area pays its employees \$2.9 million each year in salaries and benefits, much of which returns to the local economy.
- The National Area pays \$75 thousand per year in utilities
- The National Area buys \$150 thousand in supplies locally each year
- The National Area receives tens of thousands of dollars each year in special project funding that often returns to the local economy.

All told, the economic benefit to the region from National Area payroll, spending, and tourism totals almost \$10 - \$16 million annually.

## Comments

### RESOLUTION NO. 17

**Whereas**, the National Park Service has developed a Draft General Management Plan for the Big South Fork National River and Recreation Area.

**And whereas**, this plan addresses the future uses of the O & W Railroad bed in Scott County.

**And whereas**, Scott County has acquired and maintained a deeded interest in the former O & W right-of-way. This interest is coupled with an implied dedicated easement in favor of the public to travel on the right-of-way from the Eastern boundary of the National Area to a point that intersects North White Oak Creek. (General Management Plan page 39)

**And whereas**, the O & W right-of-way is one of the few areas that is accessible for vehicular traffic to accommodate senior citizens and those citizens with disabilities and handicaps that wish to enjoy the Big South Fork National River and Recreation Area.

**And whereas**, the new management plan proposes that vehicular traffic would not be allowed west of the O & W Bridge.

**And whereas**, the area west of the O & W Bridge to the White Oak Creek Bridge abutment is one of the most scenic areas available in the park that can accommodate those citizens that are handicapped and have restricted mobility to walk, picnic or sight see in the gorge area.

**And whereas**, one of the Big South Fork National River and Recreation Area primary reasons for establishment was the economic development of the Counties inside its boundaries.

**Now therefore be it resolved** that County Executive Dwight E. Murphy and Board of Commissioners of Scott County go on record in being opposed to any plan that would limit vehicular traffic on any portion of the O & W Railroad bed from Oneida to the White Oak Bridge abutment or more nearly described as the entire portion of the O & W Railroad bed that lies inside the boundaries of the Scott County, Tennessee to the Fentress County line.

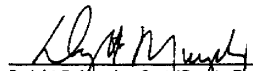
**Further** that the County Executive and Board of Commissioners believe such action to limit vehicular traffic in any portion of the O & W right-of-way in Scott County would discriminate against senior citizens and handicapped citizens that wish to enjoy the beauty of the gorge area.

**Further** the County Executive and Board of Commissioners believes if such action to limit vehicular traffic is adopted it would also be economically detrimental to the welfare of Scott County and would be contrary to the intent of the legislation that established the Big South Fork National River and Recreation Area. The original legislation intentionally left this area open for vehicular traffic.

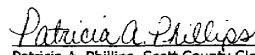
**Further**, that should a plan be initiated to prevent vehicular traffic on the O & W Railroad bed that the county attorney be authorized to take any and all necessary steps to prevent such action from occurring. This action would be taken to protect the rights of senior citizens and handicapped citizens as well as the economic well-being of Scott County.

**Further**, that certified copies of this resolution be forwarded to the entire Congressional Delegation for the states of Tennessee and Kentucky. Also that copies be sent to the Governors of Tennessee and Kentucky as well as the State Senator and Representative for Scott County.

Adopted on the 21<sup>st</sup> day of April 2003.

  
Dwight E. Murphy, Scott County Executive

ATTEST:

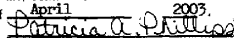
  
Patricia A. Phillips, Scott County Clerk

### STATE OF TENNESSEE SCOTT COUNTY

I, Patricia A. Phillips, County Clerk do hereby  
certify that the foregoing copy  
is a full, true and perfect copy of the original

as same appears of record now on file in my  
office.

Witness my hand and official seal at office in  
Huntsville, Tenn. this the 21<sup>st</sup>

day of April, 2003.  
  
County Clerk

Motion by Slaven, second by Burke, to approve the above Resolution as presented.

Voting AYE: Bertram, Blevins, Burke, Byrd, Chambers, Cross, Keeton, Murley,  
Hertis Phillips, Russ, Sexton, Slaven, Watson.

Voting NAY: NONE

ABSENT: Ernest Phillips.

Motion Carried.

## Responses

In the Supplemental Draft GMP, these benefits were characterized as a "minor" impact to the local economy, a statement that has been misunderstood. That analysis simply looked at the *relative difference* in economic benefits between the various alternatives. The county and others have requested an analysis showing how the National Area currently affects the local economy combined with the additional benefit of the preferred alternative. Therefore, the GMP has been revised to show the overall net effect of the National Area on the local economy – both currently and after the implementation of the preferred alternative. The analysis indicates that the current benefits are substantial, as indicated above.

Moreover, an additional \$3,900,000 in annual operating funds, over and above amounts spent to construct new facilities, would be needed to fully implement the Preferred Alternative. If forthcoming, this level of increased annual operating expenditures, when combined with higher levels of tourism that may occur as a result of implementing the Preferred Alternative, would result in a significant increase in annual economic benefits to the local and regional economy.

**G11.** Please see response G12 below.

**G12.** NPS wishes to work in partnership with Scott County to provide recreational access to the O&W Bridge area. Thus, the GMP states that the O&W route will provide continued passenger vehicle access to the O&W Bridge from the east. There would be a parking, vehicle turnaround, and picnic area just east of the bridge, the details of which will be coordinated with Scott County. The terrain west of the bridge is not suitable for a vehicle turnaround. Accordingly, the O&W route west of the O&W bridge will be a trail designated for foot, horse, and bicycle use.

## Comments

RESOLUTION No. 18

**Whereas**, there is a new Draft General Management Plan for the Big South Fork National River and Recreation Area; and

**Whereas**, the Big South Fork National River and Recreation Area was created in part for the economic development of the area; and

**Whereas**, there are several sections of the Draft General Management Plan that would be counter productive to economic development for the area.

**Now therefore**, be it resolved that County Executive Dwight Murphy and the Board of County Commissioners goes on record in requesting the Park Service review the following sections of the General Management Plan and revise them to make them more favorable for the economic development of the area:

**G13** • The Burks' Cabin (Page 61) This section calls for the removal of the cabin and allow the site to reclaim it self. It is the belief of the Board of County Commissioners that this cabin is a historical significance for the area, and also serves as a rest stop for horse riders and it's removal will serve no economic value and would be harmful to the area. We would propose the cabin be left standing and be maintained.

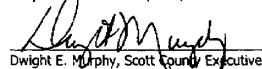
**G14** • Hurricane Ridge (aka Big Woods). The General Management Plan proposes no trails for horses or hunting access to this huge area of the Park. The plan proposes taking the existing trails to "Hole in the Wall", O & W Overlook, and Devil Den and turning them over to the John Muir Hiking Trail. The Board of County Commissioners believes horse trails are one of the greatest economic benefits of the Big South Fork and this action will severely hurt the economy of the area and has the potential to economically damaging private individuals that have built facilities outside the Recreation Area. We propose that horse trails be a planned part of this area and that hunting be allowed and encouraged for the Big Woods section.

• Recreation use: The General Management Plan is an exclusionary plan that discourages recreation access and use. It is the belief of the Board of Commissioners that the Park Service needs to review the intent of the legislation for the area and plan for the area to be used for economic development and recreational use and should mirror the wishes of the legislation that established the area.

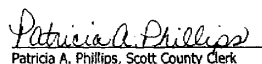
**G10** **Further**, the Board of Commissioners and County Executive believe the general management plan is flawed and contrary to the intent of the legislation. The intent of the draft plan is stated on page 204 under "Conclusions" that states: "...the Preferred Alternative would likely have a minor, long-term, indirect and beneficial impact on the growth of the local tourism economy. However, this alternative would provide only a minor increase in regional recreation opportunities; therefore it would have negligible to minor beneficial impact on the regional tourism economy."

**Further**, it is the belief of the County Executive and Board of Commissioners that careful consideration to these concerns should be reviewed and that certified copies of this resolution be forwarded to the entire Congressional Delegation for the states of Tennessee and Kentucky. Also that copies be sent to the Governors of Tennessee and Kentucky as well as the State Senator and Representative for Scott County.

Adopted on the 21<sup>st</sup> day of April 2003.

  
Dwight E. Murphy, Scott County Executive

ATTEST:

  
Patricia A. Phillips, Scott County Clerk

Motion by Burke, second by Russ, to approve the above Resolution as presented.

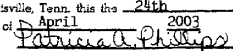
Voting AYE: Bertram, Blevins, Burke, Byrd, Chambers, Cross, Keeton, Murley, Bertis Phillips, Russ, Sexton, Slaven, Watson.

Voting NAY: NONE

ABSENT: Ernest Phillips.

Motion Carried.

STATE OF TENNESSEE  
SCOTT COUNTY

I, Patricia A. Phillips, County Clerk do hereby  
certify that the foregoing copy  
is a full, true and perfect copy of \_\_\_\_\_  
the original  
as same appears of record now on file in my  
office.  
Witness my hand and official seal, at office in  
Huntsville, Tenn. this 24th  
day of April 2003  
  
County Clerk

## Responses

**G13.** The GMP has been revised to indicate that the Burke cabin will be studied during a backcountry management planning process to determine if it is a necessary and appropriate component of the recreational experience at the National Area.

**G14.** The Supplemental Draft GMP calls for an equestrian trail in the Mt. Helen area. Unfortunately, this trail (the Long Ridge Trail (aka Mt. Helen Loop Trail)) was inadvertently omitted from Map 8 in the Supplemental Draft. The final plan has been revised to make clear that construction of this trail is an option once private lands in the area have been acquired by NPS. In addition, the GMP has been revised to include a multiple-use and horse trail on Hurricane Ridge with a spur to Jake's Hole and the O&W Overlook.

## Comments

## Responses

### Office of County Executive

Scott County, Tennessee

Dwight E. Murphy

scottexec@highland.net

(423) 663-2000

(423) 663-2355

Fax 663-3803

2845 Baker Highway  
P.O. Box 180  
Huntsville, Tennessee 37756

May 12, 2003

Supt. Reed Detring  
Big South Fork NRRRA  
4564 Leatherwood Road  
Oneida, TN 37841

Re: Draft General Management Plan/Bicycle Club:

Dear Mr. Detring:

Scott County would like to officially request that the General Management Plan be carefully evaluated to include the concerns of mountain bicyclists. The plan that is adopted needs to offer real, practical and shared trail usage for bike enthusiasts. Many of the current underutilized backcountry trails should be designated for both hiking and bicycling. Every plan seems to be very skewed toward hikers, while the original legislation intended all types of recreational usage in the Park.

It is my understanding that the bike clubs have had a positive working relationship with the Park Service in the creation and joint use of trails with hikers and equestrians in the past. The trails that are shared with equestrians should be continued with dual use. In particular the North White Oak Trail should remain a joint horse/bike trail.

I join the Bicycle Club in requesting bicycles access to the following trails be allowed in conjunction with their use by hikers:

1. Cat Ridge/Troublesome Creek/Ledbetter
2. John Muir Trail/Chestnut Ridge/Divide Rd.
3. Daniel BooneNF/Sheltowee Trail coupling to Divide Rd.
4. Grand Gap Loop/John Muir Trail/Duncan Hollow Rd.

Many of these trails are presently underutilized by hikers and could serve both groups well. Additional trails will encourage more bicyclists to visit the Park.

In closing, mountain biking opportunities are a growing economic and tourism benefit to Scott County. I personally believe we need to maximize both the economic potential and recreational usage for the counties inside the Big South Fork. Bicyclists spend many dollars in our economy and their concerns need to be a part of any general management plan. If you have questions, please contact me at 423-663-2000.

Sincerely,  
  
Dwight E. Murphy  
Scott County Executive

### Scott County (May 12, 2003)

**G15.** The Final GMP responds to the concerns raised by mountain bicyclists by adding shared-use opportunities on some of the lesser used hiking trails, and by expanding the number of trails that will be considered for bicyclists on a time-share basis if the Grand Gap Loop experiment is successful.

**G16.** Additional shared-use opportunities for bicyclists have been included in the final GMP. Under the final plan, all current biking opportunities in the Supplemental Draft GMP will remain in place. In addition, the final plan will:

- Allow bicycling on the existing connector trail from the National Forest Sheltowee Trace Tr. -> Divide Rd (development map 4: trails ST-35, JMT-51, and JMT-50). This short connector would enable bikers to ride the loop that includes Divide Road and the portion of the Sheltowee Trace Trail on the National Forest.
- Allow bicycling on Cat Ridge, Long Trail North, and the Kentucky Trail (development map 3: trails LTN16, KY-28, LTN-28, KY-39, KY-27, KY-71 and KY-26), so that cyclists could complete a circuit that includes Bald Knob – Hill Cemetery Road and Laurel Ridge Road. This loop would have a high degree of challenge and may need some physical modifications prior to being a fully functional bike circuit.
- Allow bicycling on Rock Creek Trailhead -> John Muir Trail -> John Muir Overlook -> Chestnut Ridge (development map 4: development site 4; trails 33, JMT-50, JMT-15, 3 and 4), to create a loop that includes Divide Rd. This route is already suitable for bicycle use.
- Add language to the GMP stating that if the Monday-Friday "experiment" is successful on Grand Gap Loop, NPS would consider allowing bikes on the following two trails, also on a Monday-Friday basis:
  - John Muir Trail (development map 7: trails 10 and JMT-20). This would allow a cycling loop that includes Alfred Smith Rd. -> John Muir Tr. -> Duncan Hollow Rd.
  - Angel Falls Trail (development map 7, trail 3; development map 8, trail 1).

## Comments

## Responses



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

May 9, 2003

Superintendent Reed Detring  
Big South Fork NRRRA  
4564 Leatherwood Ford Road  
Oneida, TN 37841

**RE: EPA Review and Comments on  
Big South Fork National River and Recreation Area  
Draft Supplemental General Management Plan and  
Environmental Impact Statement (DSEIS)  
CEQ No. 030050**

BIG SOUTH FORK NRRRA OBED WSR	
MAY 13 2003	
Act.	Info.
	SUPT.
	ASST SUPT.
	ADMIN. PLANNING
	OUTREACH
	FINANCE
	LEGAL
	RECORDS
	TRAINING
	OTHER

Dear Mr. Detring:

The U.S. Environmental Protection Agency (EPA) reviewed the subject *Supplemental General Management Plan and Environmental Impact Statement* (DSEIS) Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act. The document provides information to educate the public regarding general and project-specific environmental impacts and analysis procedures, and follows the public review and disclosure aspects of the NEPA process. The purpose of this letter is to inform you of the results of our review.

The stated goals of the planning effort are to preserve park resources and to provide for visitor use. The DSEIS outlines a management plan to achieve these objectives. The alternative which is selected will guide the management and direction of Big South Fork NRRRA over the next 15 to 20 years. Alternative D is identified as the proposed action, the NPS preferred alternative, and the environmentally preferred alternative. EPA concurs with the National Park Service's plan for preserving park resources and providing for visitor use.

**G17** The scope of this proposed action appears to be within acceptable limits in order to achieve project objectives. Based on the information provided in this document, there appears to be no significant environmental impacts associated with the proposed project alternatives. The document received a rating of "LO," (Lack of Objections); that is, we did not identify any potential environmental impacts requiring substantive changes to the proposal.

The DSEIS states that existing conditions are causing major adverse impacts to water quality in certain parts of the National Area, and that the Preferred Alternative would improve some of these conditions. Expected levels of visitor use under the Preferred Alternative would have localized negligible or minor impacts on the environment. The plan for directed management

## U.S. Environmental Protection Agency

**G.17.** Comment noted.

Internet Address (URL) • <http://www.epa.gov>

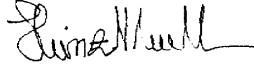
Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

## Comments

of visitor use and natural resource protection provides for monitoring use and resource conditions in order to avoid and/or minimize impacts. Our attached comments include areas which should be clarified in the FSEIS.

Thank you for the opportunity to comment on this DSEIS. If you have any questions or require technical assistance, you may contact Ramona McConney of my staff at (404) 562-9615.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz J. Mueller". The signature is fluid and cursive, with the first name "Heinz" and last name "Mueller" clearly distinguishable.

Heinz J. Mueller, Chief  
Office of Environmental Assessment





# Comments

## EPA Review and Comments on Big South Fork National River and Recreation Area Draft Supplemental General Management Plan and Environmental Impact Statement (DSEIS)

Big South Fork Final General Management Plan and Environmental Impact Statement

- G18** **Tables:** Please label with headers (Alternative A, B, etc.) the subsequent pages of the tables beginning on page 137. It is unclear as to which column refers to which Alternative on the unlabelled pages.
- G19** **Education and Communication:** Please provide further information in the FSEIS regarding the planned measures to educate visitors regarding environmental resource protection and conservation at the NRRA.
- G20** **Enforcement:** Please clarify the staffing for enforcing the new management plan for the NRRA. When the new rules create more restrictions for visitors, (for example, ATV users), there may be a need for increased enforcement efforts.

## Responses

**G18.** The GMP has been revised to include header rows within the tables that compare the alternatives.

**G19.** Efforts to educate visitors about resource protection will be covered in a future comprehensive interpretive plan. The need for this plan and some of its proposed components are discussed in chapter three under *Visitor Education and Orientation*.

**G20.** In chapter three of the GMP, the *Cost Considerations* section discusses the annual operating funds necessary to fully implement the preferred alternative. This funding level takes into consideration the additional law enforcement that will be necessary to implement the plan.

# Comments



## United States Department of the Interior

FISH AND WILDLIFE SERVICE

446 Neal Street  
Cookeville, TN 38501

May 15, 2003

Mr. Reed E. Detring, Superintendent  
Big South Fork National  
River and Recreation Area  
4564 Leatherwood Road  
Oneida, Tennessee 37841

Subject: Supplemental Draft General Management Plan (GMP) and Environmental Impact Statement (EIS), Big South Fork National River and Recreation Area (BSFNRRRA), Kentucky and Tennessee.

Dear Mr. Detring:

Fish and Wildlife Service personnel of the Kentucky and Tennessee Field Offices have reviewed the subject Supplemental Draft GMP/EIS. We believe that Alternative D, which the National Park Service (NPS) has designated as the preferred alternative, is generally an appropriate choice for implementation. However, we offer the following specific comments for further consideration.

**G21**

The plan to permit off-highway vehicle (OHV) operation in the Darrow Ridge/Tar Kiln Ridge area exhibits significant potential for impacts to endangered freshwater mussels and fish. Any noticeable transport of sediments to perennial streams in this area may result in significant impacts to these federally listed aquatic species. Further, the subject GMP/EIS implies that some OHV crossings of intermittent and ephemeral channels would be allowed. The location of planned OHV use is rather sensitive in terms of the presence of endangered aquatic species. Crossings of defined stream channels would likely lead to impairment of freshwater mussel resources located downstream of such crossings. We have observed that OHV users tend to create their own trails, the locations of which generally are not based on stream management principles. Therefore, we recommend that you carefully evaluate any OHV use of the BSFNRRRA as a component of Alternative D or either of the other alternatives. Because of the challenges that the subject area offers regarding steep slopes and proximity to nearby sensitive aquatic resources, nearby areas that do not exhibit such characteristics may offer better recreational OHV user opportunities.

**G22**

As described in the subject document, horse crossings at various points along the Big South Fork have recently resulted in documented impacts to endangered mussels. Although our agencies have coordinated on this issue, it continues to be a challenge. We believe that development of a long-term solution for these river crossings, in the most timely manner feasible, is necessary. We will gladly provide any assistance possible in aiding the NPS with its mussel protection and restoration efforts.

# Responses

## U.S. Fish and Wildlife Service

**G21.** Off-road vehicle usage within units of the national park system is guided by Executive Order 11644 (as amended); the Code of Federal Regulations, Chapter 36, part 4.10; and National Park Service Management Policies, section 8.2.3.1. These regulations and policies allow off-road vehicle use within the national park system, provided that routes and areas are designated through a special regulation and that the agency can demonstrate that the route does not cause adverse impacts on the area's natural, cultural, scenic, and esthetic values. ATV use at Big South Fork NRRRA is currently not in compliance with these regulations and policies; there is neither a special regulation to designate routes, nor has sufficient data been collected to make a determination regarding adverse impacts.

The GMP attempts to bring ATV usage into compliance with existing regulation and policy by designating areas within which specific ATV routes would be designated. Once the GMP is approved, the agency would seek a special regulation designating official route(s).

In addition, the National Park Service would monitor the effects of the ATV route(s) and usage. Executive Order 11644 states, "The respective agency head shall monitor the effects of the use of off-road vehicles.... On the basis of the information gathered, they shall from time to time amend or rescind designations of areas or other actions taken pursuant to this order..." The National Park Service would monitor the designated route(s) and make a final determination concerning the appropriateness of recreational ATV use within Big South Fork NRRRA.

NPS must have supportable data on which to make a defensible decision to either allow or disallow ATV activity. The plan as proposed would permit NPS to collect data in a way that will objectively demonstrate the compatibility of properly managed ATV use with the Service's responsibility to protect the area's natural, cultural, scenic, and esthetic values. The data will allow a more informed decision to permit ATV use or to further restrict or eliminate the use completely.

**G22.** As stated in the policy on horses and mussels in the GMP appendix, the current system of controlled horse crossings of the river has reduced the number of conflicts between horses and mussels, but does "not represent a long term solution to the problem." NPS agrees that a long-term solution to this challenging problem must be found, and we are actively working with the U.S. Fish and Wildlife Service to seek solutions. Options for reducing horse-mussel conflicts could include 1) construction of horse bridges over the river, 2) hardening of crossings in

## Comments

**G23** It is important to note that expansion of the mussel community and its respective populations within the BSFNRRRA would lessen the relative magnitude of impacts to mussels due to use of horse crossings and other human-related disturbances at sites supporting federally listed species.

**G24** Finally, the subject document described a general intent to maintain existing fields in their present condition. Several bird species that inhabit the Cumberland Plateau rely on early successional habitats, which likely occurred on the BSFNRRRA property during early pre-settlement times. Strict maintenance of areas as either field or forested habitats would likely diminish the potential use of BSFNRRRA by some bird species. Therefore, we recommend that you consider inclusion of early successional habitats in your management scheme. This would likely be most easily accomplished by simply allowing fields to naturally succeed or by using occasional disturbances (e.g., fire or mechanical clearing) to maintain these habitats.

Thank you for this opportunity to provide input for the GMP planning effort. We look forward to further coordination on specific issues as detailed planning for future projects continues. Please contact David Pelren of my staff at 931/528-6481 (ext. 204) if you have questions about these comments.

Sincerely,



*for* Lee A. Barclay, Ph.D.  
Field Supervisor

xc: Lee Andrews, FWS, Frankfort, KY

## Responses

the river, 3) relocation of the horse crossings to a less sensitive location, 4) removal of horse crossings from the river, and 5) relocation of mussels to a more suitable location.

**G23.** NPS, working closely with multiple partners including the U.S. Fish and Wildlife Service, recently approved the plan for recovery of freshwater mussels in the free-flowing reach of the Big South Fork. This plan establishes the Big South Fork of the Cumberland River (within Big South Fork NRRRA) as a nationally significant refugium for the maintenance and recovery of mussels that live and once existed in the area, including those that are federally listed. It is the hope of the NPS that these efforts will eventually lead to recovery and de-listing of endangered mussel species, which will have the net effect of reducing or eliminating the severity of impacts to mussel populations from human-related disturbances.

**G24.** The National Area is currently preparing a fields management plan that will be posted for public review and comment. NPS will be working with the U.S. Fish and Wildlife Service on this plan, and the issues they raise will be addressed through the planning process.

## Comments



**Effie Houston** To: Reed Detring/BISO/NPS@NPS, Chris Stubbs/BISO/NPS@NPS  
 05/07/03 04:10 PM EDT cc:  
 Subject: Big South Fork National River & Recreation Area

----- Forwarded by Effie Houston/BISO/NPS on 05/07/03 04:10 PM -----



**"Patricia E Riley"** To: biso\_superintendent@nps.gov  
 <periley@usgs.gov> cc:  
 05/07/03 02:38 PM AST Subject: Big South Fork National River & Recreation Area

Hello,

**G25** USGS has reviewed the subject Draft EIS/General Management Plan and has no comments to offer.

Thanks.

\*\*\*\*\*  
 Trish Riley  
 U.S. Geological Survey  
 423 National Center  
 Reston, VA 20192  
 703.648.6822

1700 Bypass Rd. Winchester, Ky. 40391  
 Tel: (859) 745-3100 Fax: (859) 744-1568  
 E-mail: fmarriott@fs.fed.us  
 \*\*\*\*\*

Laurie A Smith

Marriott/R8/USDAFS@FSNOTES  
 04/09/2003 05:16  
 PM

To: Fred  
 cc:  
 Subject: Sheltowee Trace

**G26**

The BSF is planning (In their new draft plan) to construct a trail in order to move the Sheltowee off of County Road 575. This will provide horse trail connections with their other horse trails and get hiker, bikers, horseback riders off the gravel road. Is there anything in the legislation that would prevent us from "moving" a portion of the Sheltowee Trace to a better location? We are in support of this. It would relocate most of section 36 to their jurisdiction.

\*\*\*\*\*  
 Laurie Smith  
 Forester (ORA)  
 Stearns Ranger District  
 3320 Hwy 27 North  
 Whitley City, KY 42653  
 606-376-5323  
 lauriesmith@fs.fed.us  
 \*\*\*\*\*

## Responses

## U.S. Geological Survey

**G. 25.** Comment noted.

## U.S. Forest Service

**G26.** The comment refers to the Long Trail North on development maps 3 and 4. For the purposes of planning and database management, we cannot rename the trail at this time. Visitor use and understanding will be facilitated by renaming this as the Sheltowee Trace Trail, so the GMP has been revised to indicate that this trail will be renamed on park maps and signage after the GMP planning process is complete.

## Comments

## Responses



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Natural Heritage  
14th Floor L&C Tower  
401 Church Street  
Nashville, Tennessee 37243-0447  
Phone 615/532-0431 Fax 615/532-0231

BIG SOUTH FORK NARR OBED WSR	
MAY 15 2003	
Act.	Info.
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<input type="checkbox"/>	OBED MANAGER

May 13, 2003

Superintendent  
Big South Fork NARR  
4564 Leatherwood Road  
Onida, TN 37841

Dear Superintendent:

The Division of Natural Heritage (DNH) Tennessee Department of Environment and Conservation is pleased to have the opportunity to comment on the "Supplemental Draft Management Plan and Environmental Impact Statement (January, 2003). The DNH has significant interest in the management of the BSFNRRRA because of DNH's responsibility for administering both the Tennessee Natural Areas Program (TNAP) and the Tennessee Rare Species Protection Program. Furthermore, the Natural Heritage Program in DNH is currently conducting inventory in the BSFNRRRA for Nature Serve under contract by the National Park Service (NPS). The Natural Heritage Program does statewide biological inventory which supports natural area and rare species protection.

Specifically, the management of BSFNRRRA is of interest to DNH because the TNAP oversees the protection of Twin Arches Designated State Natural Area and Honey Creek Designated State Natural Area in the BSFNRRRA and tracks the occurrence of numerous rare species in BSFNRRRA including the federally endangered Cumberland rosemary, Cumberland sandwort, Virginia spiraea, and several mussel species. DNH is concerned about any potential impacts to designated state natural areas, rare species and their habitat.

In a broader context, DNH is concerned about how public lands are managed in Tennessee, especially those that can sustain ecosystem function at the landscape scale. The DNH recognizes the effort committed to developing this EIS and appreciates the thorough treatment given to uses and potential impacts. The DNH supports the National Park Service Preferred Alternative D, which allows for uses according to defined zones. In general, the Preferred Alternative D provides adequate management planning to protect the resources. The DNH however does have recommendations to improve the final management plan, observing omissions in the EIS that should be addressed.

# Comments

## Comments Regarding Rare Species Protection

G27

The Rare Species Protection Program concurs with the assessment of Environmental Consequences as related to Special Status Species (listed endangered or threatened state and federal species) for each of the General Management Plan Alternatives. The Preferred Alternative D provides greater protection to Special Status Species and their habitat (especially aquatic, gravel bar, and rock shelter communities). Providing that the NPS follows planning, consultation, mitigation, and management guidelines as outlined within the Special Status Species section for each Alternative, excluding the No-Action Alternative, no adverse affect on any Special Status Species would be likely. The DNH supports the implementation of inventory studies, including site-specific surveys, and management studies; development of protection strategies; continued consultation with USFWS; and implementation of monitoring to assess the impacts of management actions. The DNH would welcome the opportunity to consult with NPS on actions that may affect state and federal listed rare plant species, particularly Cumberland rosemary, Cumberland sandwort, and Virginia spiraea.

## Comments Regarding State Natural Areas

G28

In general, it appears that under Alternative D there is no development and impact to either Twin Arches or Honey Creek Designated State Areas, nor are there impacts to ecologically sensitive habitats such as gravel bars and "rock house communities." In reviewing maps of specified locations in the EIS, it appears that no new trail development or access is planned for either Twin Arches or Honey Creek. Any trail development or new access to the state natural areas should be coordinated with TNAP. There is difficulty beyond specific point locations however in identifying management actions, since there are no natural area boundaries provided nor topographic features included on the maps.

G29

One criticism of the EIS is the general lack of discussion, consideration or recognition of the Designated State Natural Areas in BSFNRRRA. The mission of the Tennessee Natural Areas Program should be provided with appropriate references to the Natural Areas Preservation Act of 1971 and the Rules for Natural Resource Areas. TNAP recommends that both documents be included in the NPS final management plan as an appendix. TNAP recommends that natural area management issues be addressed in the NPS final management plan and recommends that these issues be determined through a management planning process between NPS and TNAP. This should ultimately result in natural area management plans for both Honey Creek and Twin Arches.

The TNAP would welcome the opportunity to work with NPS to determine boundaries for both Twin Arches and Honey Creek in order to include those boundaries in all future NPS documents. A boundary for Twin Arches has recently been proposed by the State to NPS and the boundary for Honey Creek should approximate the original Bowater boundary for the natural area unless the State and NPS agree that a larger boundary should be delineated.

## General Comments about the EIS

G30

DNH recommends that NPS reconsider the amount of trail development it is proposing for development, particularly the amount of planned horse trail extension. Excessive trail development poses problems that affect a wilderness experience that one may seek in visiting the BSFNRRRA. Extensive trail development can also have negative ecological impact in fragmenting the resource, erosion, and being a conduit for invasive species. All trail development, particularly horse trails, should be recognized as potential sources for introduction of invasive exotic pest plant species. Horses are vectors for spreading invasive exotic plant propagules. Invasive grasses like microstegium thrive when disturbance occurs, and it frequently becomes established along new trail corridors. NPS should appropriate the required budget dollars to manage impacts caused by trail and other development. It is recommended by DNH that proposed trail development be reduced to minimize the ecological impacts and required mitigation.



## Responses

### **Tennessee Department of Environment and Conservation, Division of Natural Heritage**

**G27.** Comment noted. NPS appreciates the support and assistance from the Division of Natural Heritage in the management of rare species.

**G28.** As indicated in the GMP on the development and zone maps, NPS proposes no new developments (roads, utilities, or facilities) in either the Honey Creek or Twin Arches areas.

**G29.** Chapter 4, the affected environment, has been revised to include a discussion of the Honey Creek and Twin Arches State Natural Areas, and the zone maps have been revised to show these areas. NPS looks forward to working with the Division of Natural Heritage after the completion of the GMP process in the development of joint management plans for these areas.

**G30.** The proposed horse trail density and number of access points is consistent with the congressional mandate to manage the National Area in accordance with the national recreation area concept. NPS has no intention of constructing trails or access points that it cannot maintain or patrol adequately, or that will cause impairment of the resource. Each new trail proposal, rehabilitation, or realignment will be evaluated on a case-by-case basis, undergo an on-site survey by natural and cultural resource specialists, and receive an appropriate level of environmental compliance review and documentation (see Chapter 3 of the GMP). Thus, implementation of the plan will depend in large part on future funding, staffing levels, and potential environmental impacts. There is no guarantee that all of the trail proposals shown in the GMP will be funded and implemented over the life of the plan.

NPS agrees that trail corridors and certain types of uses can be vectors for the spread of invasive, exotic species. The GMP presents a comprehensive strategy for managing the National Area's roads and trails system that should help control the spread of these problematic plants by 1) eliminating undesigned "social" trails, 2) focusing recreational use on a specified, designated trail system, and 3) removing unauthorized trail uses by implementing a "closed unless marked open" system of recreational use.

## Comments

## Responses

G31

In addition, the National Management Plan "Meeting the Invasive Species Challenge" issued by the National Invasive Species Council (2001) and Executive Order (EO) 13112 issued by President Clinton requires that federal agencies manage invasive species and take all actions feasible to minimize introductions. It is recommended that discussion be given to exotic species impacts in the final management plan indicating that management and control strategies are under consideration and will be implemented. Neither the National Invasive Species Management Plan nor the EO are referenced in the EIS nor is there a discussion given to this serious ecological threat and management implications. It would appear that EO should be included in Chapter two "Required Management -- The Institutional Framework." This chapter contains references to other pertinent EO's.

### Summary

The DNH supports the National Park Service Preferred Alternative D and commends NPS for its effort and thoroughness in developing the EIS. The Preferred Alternative D adequately protects ecologically sensitive areas and rare species and/or allows for the required mitigation and management actions that will protect them. The DNH finds that no impacts to Designated State Natural Areas are evident in the EIS under Preferred Alternative D. The DNH recommends that discussion regarding Designated State Natural Areas be provided in the final management plan that addresses boundary delineation and management related matters. The DNH recommends that trail development be reduced, and that the invasive exotics species issues be addressed.

The DNH appreciates the opportunity to comment on the Supplemental Draft General Management Plan and EIS for the BSNRRA. If you have any need for further information or questions, please feel free to contact us.

Sincerely,



Brian Bowen, Administrator  
Tennessee Natural Areas Program

c: Reggie Reeves, Director, Division of Natural Heritage  
David Lincicome, Rare Species Program Coordinator  
Roger McCoy, Natural Heritage Program Coordinator.

**G31.** The National Area has an on-going program researching the abundance and distribution of exotic plant species, and park staff is actively engaged in the removal of these species. A detailed discussion of exotic, invasive plant species is beyond the scope of the GMP, but NPS agrees this is a critically important issue. The plan has been revised to include a brief discussion of Executive Order 13112 on invasive species and to indicate that an Integrated Pest Management Plan and a Vegetation Management Plan will be prepared once the GMP planning process is complete.

## Comments

DONALD S. DOTT, JR.  
DirectorPAUL E. PATTON  
General ManagerCOMMONWEALTH OF KENTUCKY  
**KENTUCKY STATE NATURE PRESERVES COMMISSION**801 SCHENKEL LANE  
FRANKFORT, KENTUCKY 40601-1403  
(502) 573-2886 VOICE  
(502) 573-2355 FAX

May 14, 2003

Superintendent  
Big South Fork NRRRA  
4564 Leatherwood Ford Road  
Oneida, Tennessee 37841

Dear Sir:

The Kentucky State Nature Preserves Commission has reviewed the Supplemental Draft General Management Plan and Environmental Impact Statement (hereafter referred to as the EIS) for the Big South Fork National River and Recreation Area (BSFNRRRA), Kentucky/ Tennessee. The Commission supports the National Park Service's Preferred Alternative D, but we would like to emphasize several points.

**G32**

1) The use of horse trails should be very carefully monitored to assure that use or overuse does not impact natural resources, especially aquatic resources and adjacent terrestrial populations of plants and animals. Of special concern are those portions of horse trails that cross or come in close proximity to the Big South Fork. The river contains mussel beds that support several species listed by the U.S. Fish and Wildlife Service. Horse trails that cross the river or come in close proximity to mussel beds should be re-routed to avoid impacts. Specific plans for monitoring trails for erosion and other signs of overuse should be incorporated into the final EIS. A related concern is the monitoring of exotic species that may be carried into the interior of the BSFNRRRA by horses. Provisions for regular monitoring for exotic species along these trails should be incorporated into the final EIS.

**G33**

2) Attached with this letter are copies of the latest list of Endangered, Threatened, Special Concern, and Historic Biota of Kentucky (KSNPC. 2000. Journal of the Kentucky Academy of Science 61:115-132 [October 2001 reprint]) and the Kentucky Rare Plant Recognition Act. Both of these publications will likely serve as useful references for your staff regarding rare species on the NRRRA.



AN EQUAL OPPORTUNITY EMPLOYER M/F/D

## Responses

**Kentucky State Nature Preserves Commission**

**G32.** Trail monitoring, and the development of indicators and standards for trail conditions, are beyond the scope of the GMP. The NPS has begun to study trail conditions and develop a trails monitoring program through contracted research conducted by Dr. Jeffrey Marion at Virginia Tech (Marion, 2004, draft report). In addition, the NPS has applied for funding to develop resource and social indicators and standards to be used in the management of backcountry resources, including trails.

As stated in the policy on horses and mussels in the GMP appendix, the current system of controlled horse crossings of the river has reduced the number of conflicts between horses and mussels, but does "not represent a long term solution to the problem." NPS agrees that a long-term solution to this challenging problem must be found, and we are actively working with the U.S. Fish and Wildlife Service to seek solutions. Options for reducing horse-mussel conflicts could include 1) construction of horse bridges over the river, 2) hardening of crossings in the river, 3) relocation of the horse crossings to a less sensitive location, 4) removal of horse crossings from the river, and 5) relocation of mussels to a more suitable location.

**G33.** As stated in the response to the Tennessee Division of Natural Heritage comment G31, the National Area has an on-going program researching the abundance and distribution of exotic plant species, and park staff is actively engaged in the removal of these species. A detailed discussion of exotic, invasive plant species is beyond the scope of the GMP, but the plan has been revised to indicate that an Integrated Pest Management Plan and a Vegetation Management Plan will be prepared once the GMP planning process is complete. These documents will provide the framework for the systematic and long-term monitoring, management, and removal of exotic plant species.

# Comments


Letter regarding BSFNRRRA EIS  
May 14, 2003  
Page Two

**G34**

3) Finally, a provision to permanently restrict OHV use to the currently designated OHV area and not be expanded into or allowed in other portions of the BSFNRRRA should be incorporated into the final EIS.

Thank you for the opportunity to comment on the EIS.

Cordially,

  
Donald S. Dott, Jr.  
Executive Director

## Responses

**G34.** Under the Final GMP, all terrain vehicles (ATVs) will be allowed only on designated routes within the ATV planning area, and on multiple-use trails during big game season while actively hunting. Other types of off-highway vehicles (e.g., licensed four-wheel drives, licensed rail cars, and licensed dirt bikes), will be allowed on park roads and multiple-use trails.

## Comments

DIVISION OF GEOLOGY  
13<sup>TH</sup> FLOOR, L & C TOWER  
401 CHURCH STREET  
NASHVILLE, TN 37243-0445  
(615) 532-1504

May 12, 2003

Reed E. Detring, Superintendent  
U. S. Dept. of Interior  
National Park Service  
Big South Fork NRR  
4564 Leatherwood Road  
Oneida, TN 37841

Re: Draft General Management Plan and EIS

Dear Superintendent Detring:

Thank you for the opportunity to review and comment on the draft plan for the Big South Fork area. There are several issues discussed in the plan where the park and the Tennessee Division of Geology have a common interest. I hope we will continue to have the good working relationship we have shared in the past in our mutual efforts to minimize or resolve these issues.

There are three specific issues that the division would like to see addressed in more detail through mutual co-operation:

**G35** 1) Despite the current situations we all face regarding limitations in funding and personnel, the division and the park should continue our co-operative efforts to manage the oil and gas well activity in the park and surrounding area. The well inventory project of 2000 – 2001, co-operative agreement No. 1443-CA-5130-98-002, provided the baseline data on oil and gas activity in the park area. The subsequent extension of this agreement to plug a leaking gas well, permit no. 5175, from the resultant priority list should serve as a pilot project for future remedial activities.

**G36** 2) The detail given to hiking and horse trails should be applied to developing plans and procedures for oil and gas well access roads. With the participation of well operators, developing specific guidelines within the 36 CFR 9B regulations for re-entering and maintaining existing access roads to well sites in the park

## Responses

### Tennessee Division of Geology

**G35.** Comment noted. NPS will continue its active partnership with the Tennessee Division of Geology in the management of oil and gas well activity in and around the National Area.

**G36.** Currently, many oil and gas well access routes are being used as routes by OHVs and horses where the public has access. This use is not always suitable because of safety, maintenance and resource issues. The recreational routes proposed in the plan that also are used by oil and gas operators have been identified as suitable for public use. Oil and gas well access roads, other than those designated for recreational use in the GMP, will not be open for recreational use. Oil and gas well operators have the legal authority to use the oil and gas roads, and under approved plans of operation, are responsible for maintaining these routes.

Details regarding specific (non-recreational) oil and gas well access roads are beyond the scope of the GMP. In 2004, the National Area began an oil and gas management plan that will address this and many other issues, including the approval of plans of operation.

# Comments

Page 2

might be a consideration to deal with this matter. The duration of time for the approval of operating plans from operators is, at present, too long.

**G37**

3) The third issue concerns mapping and publishing the geology and mineral resources on the USGS 7-1/2 minute quadrangles covering the Big South Fork and adjacent areas. At present very little work has been done on this particular area of the Cumberland Plateau. Mapping the state at this scale is one of the division's mandated functions and there are plans for mapping the quadrangles covering this area in the future. The assistance and continued cooperation of park personnel would prove beneficial to the mission of both agencies.

Again, I thank you for giving the division the opportunity to comment at this time. If I can be future service, please advise.

Respectfully,

Michael L. Hoyal  
Asst. State Geologist

## Responses

**G37.** The NPS would be pleased to provide the Tennessee Division of Geology with data and assistance in their mapping efforts.



# Comments



**TENNESSEE HISTORICAL COMMISSION**  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
2941 LEBANON ROAD  
NASHVILLE, TN 37243-0442  
(615) 532-1550

March 5, 2003

Mr. Reed Deetring  
Superintendent/Big South Fork NRA  
4564 Leatherwood Ford RD.  
Oneida, Tennessee, 37841

RE: NPS, BISO/GENERAL MANAGEMENT PLAN/SUP, MULTI COUNTY

Dear Mr. Deetring:

**G38**

In response to your request, received on Monday, March 3, 2003, 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 77698-77739) if you are unsure about the Section 106 process. You may also find additional information concerning the Section 106 process and the Tennessee SHPO's documentation requirements at [www.state.tn.us/environment/hist/sect106.htm](http://www.state.tn.us/environment/hist/sect106.htm).

Based on available information, we find that the document as currently proposed meets the compliance requirements of 36CFR Part800 dealing with Section 106 review as mandated by the National Historic Preservation Act of 1966.

Therefore, this office has no objection to the implementation of the undertakings enumerated in the general management plan so long as this office is afforded appropriate opportunity to comment relative to issues having to do with is project. Should project plans change, please contact this office to determine what additional steps, if any, are required to comply with Section 106. Questions and comments may be directed to Joe Garrison (615)532-150-103. Your cooperation is appreciated.

Sincerely,

*Herbert L. Harper*

Herbert L. Harper  
Executive Director and  
Deputy State Historic  
Preservation Officer

HLH/jyg

BIG SOUTH FORK NRA			
OBED WSR			
MAR 10 2003			
Act.	Info.	Init.	Date
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<input checked="" type="checkbox"/>	FILES		
<input type="checkbox"/>	LOGS/MANAGER		

## Responses

### Tennessee Historical Commission

**G. 38.** Comments noted.