

**Public Comments and National Park Service Responses**  
**(Received by the May 15, 2003 deadline)**

**PURPOSE AND NEED FOR THE PLAN**  
**REQUIRED MANAGEMENT – THE INSTITUTIONAL FRAMEWORK**

- P1.** *Comment: In the Supplemental Draft GMP, NPS ignores its responsibility to follow the authorizing legislation requiring healthful recreation and economic benefit. Rather than expand opportunities, the NPS has removed recreation from the recreation area. It appears a biodiversity first, humans second policy would be implemented.*

Response: The Preferred Alternative expands, rather than restricts, opportunities for recreational use of the National Area. For example, the official road and trail system contained in the Preferred Alternative would offer a number of new opportunities for various user groups, including bicyclists and equestrians. Overall, the Preferred Alternative includes a level of development that will have a significant beneficial impact on the local and regional economy. An additional \$3,900,000 in annual operating funds would be needed to fully implement the Preferred Alternative. This funding level is over and above what would be required to construct the facilities called for in the Preferred Alternative. These expenditures (if forthcoming), when combined with the higher levels of tourism that would likely be generated by the Preferred Alternative, would result in a significant increase in annual economic benefits to the local and regional economy. The plan has been revised to clarify the economic benefits accruing from the Preferred Alternative.

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 the potential for unacceptable adverse resource impacts and the need for a designated trail system that can be readily managed and maintained. As a number of commenters on the draft pointed out, 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.

The enabling legislation for the National Area 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 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.*

This and related provisions in the enabling legislation reflect the overarching mandate of the National Park Service, as contained in the NPS Organic Act and NPS General Authorities Act. These acts require NPS to provide opportunities for public use and enjoyment of the units of the National Park System while leaving their resources unimpaired for future generations. The GMP adheres to the mandates in the Organic Act and enabling legislation by providing a level of recreation consistent with the national recreation area concept while still protecting the natural and cultural resources of the National Area. Under the plan, human use is not secondary, but can only take place at a level that will leave National Area resources unimpaired for the future.

The GMP makes clear that any trail not in the official system is considered closed and will not be maintained. All closed trails will be revegetated and rehabilitated to the extent that resources allow. The purpose of this provision is to prevent the proliferation of social pathways and unauthorized trails, to limit resource impacts, and to maintain only those trails that provide for sustainable recreational use. While some might consider this provision to constitute a reduction in recreational opportunities, NPS cannot allow the unauthorized construction and use of social trails to continue. Too often these trails are poorly designed and sited and consequently have unacceptable resource impacts. The proliferation of unauthorized trails also creates a network that is too large for NPS to monitor, maintain or patrol.

- P2.** *Comment: The Fentress County business community has invested millions of dollars in recreation-related business and developments, based on the hope that one day Big South Fork facilities would truly reflect the high standard of a “national park.” We wish to see visitation grow, rather than remain static as it has for the past 11 years. Visitation has never achieved the projected 2 million per year (immediately after construction), largely due to lack of developed access points and recreation facilities.*

Response: The National Area, designated by Congress as a “national river and recreation area,” is mandated to protect resources and provide for visitor use and enjoyment. Regarding recreation, it is the goal of the NPS to provide a high quality backcountry and rustic recreational experience within the ever-increasing population of the southeastern United States. The GMP preferred alternative details a system of seven zones designed to provide these recreational opportunities while still protecting the resources that make the National Area a special place to visit. The preferred alternative provides for hundreds of miles of recreational roads and trails; numerous visitor access points and trailheads; and visitor contact/information centers in Fentress, Scott, McCreary, and Morgan counties. 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). The plan

encourages the development of visitor facilities by local business people outside the National Area so tourism dollars remain in the surrounding communities. It also reaffirms partnerships to enhance the visitor experience and promote tourism. These efforts are intended to provide the highest quality recreational experience possible and may have the net benefit of increasing visitation and tourism to the National Area.

As noted in the comment, the numbers of visitors to the National Area predicted by a 1974 study have not materialized, nor have the anticipated benefits reached projected levels. However, it is important to note that a number of assumptions from the early study were not reflected by the National Area as ultimately authorized by Congress. The National Area as authorized was significantly different from the 1974 study proposal. This difference accounts in part for the fact that visitation has never reached the annual two million visitors cited in the comment. Nevertheless, for many years now the National Area has had a significant beneficial impact on the local and regional economy.

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

## ALTERNATIVES – INCLUDING THE PROPOSED ACTION

### General

**P3.** *Comment: The Supplemental Draft GMP does not provide a full range of alternatives, as required by 40 CFR 1502.14. Each is a slight variation of the other, with Alternative D (the preferred alternative) simply being the most detailed.*

Response: Under NPS policy (Director's Order No. 2, "Park Planning"), the purpose of a general management plan is to set forth, in a broad overview, the types of resource conditions, visitor uses, and management actions that will best achieve the NPS' mandate to preserve resources unimpaired for the enjoyment of future generations. The GMP is intended to be the first phase of tiered planning and decision making, with subsequent detailed planning documents to be addressed to specific areas of concern (e.g., fire management, oil and gas management, development concepts, etc). It should be noted that the GMP is not intended to contain detailed plans for development or specific implementation plans. Stated another way, the GMP for the National Area is not intended to resemble the Master Plan for Big South Fork (1981) prepared by the Corps of Engineers.

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 and decision making. The zones are the heart of each alternative.

The three action 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.

**P4.** *Comment: Only about a 10% difference in cost of facilities exists between the alternatives, which is a very minor difference over a 20-year period. The GMP should include an alternative that elevates recreation facility development to a level consistent with the Corps of Engineers Master Plan for Big South Fork (1981), including the two lodges envisioned in the authorizing Act. Only such an alternative would fulfill Congress' intent that the National Area benefit the economy of the region.*

Response: To be included in a draft general management plan, a proposed alternative must be feasible to implement. Given projected budgetary constraints, as well as the extensive backlog of deferred maintenance throughout the National Park System, it is extremely unlikely that sufficient financial resources would be made available to do the types of development envisioned by the Corps' Master Plan. With respect to the two lodges, the enabling legislation states as follows: the "the Secretary *is authorized* to construct two lodges with recreational facilities within the adjacent area so as to maximize and enhance public use and enjoyment of the National Area" (emphasis supplied). The key consideration is that construction of the lodges is authorized, but not mandated. Assuming that the construction of lodges is desired by local communities, NPS believes that the most feasible – and economically beneficial – approach would be for the lodges to be constructed outside the National Area and operated by private investors, preferably from the local area. Such an approach would have the greatest likelihood of benefiting the local economy in that it would maximize the amount of tourism income earned by local businesses and reinvested in the local area.

As noted in the response to comment P2, the Preferred Alternative would have significant beneficial impacts on the local economy, over and above the benefits already being realized today. The plan has been revised to clarify and highlight those beneficial impacts.

**P5.** *Comment: A comparison of Alternatives A&B between the February 2000 Draft and the January 2003 Supplemental Draft reveals huge discrepancies. The text of the Supplemental Draft leads the public to believe that Alternatives A&B are included unchanged as they were presented in the February 2000 Draft. This is not the case. Many changes have been made, which appears to be reflected in the cost estimates for these alternatives. The cost estimate for Alternative A in the Supplemental Draft is \$15.2 million less than the February Draft. The cost estimate for Alternative B is \$28.1 million less. Please explain.*

Response: The cost figures for alternatives A and B have changed between the 2000 Draft GMP and the 2003 *Supplemental Draft GMP*. Soon after releasing the 2000 Draft GMP, NPS adopted service-wide a new procedure for estimating costs in general management plans. This new, more accurate procedure was used to develop the projected cost figures for Alternative D, the Preferred Alternative in the *Supplemental Draft GMP*. However, use of the new procedure for Alternative D meant that the previous cost figures for alternatives A and B could not be compared with the new figures for alternative D, because the cost figures for alternatives A and B had been derived using different assumptions and methods. Therefore, in order to allow members of the public to do a meaningful comparison of the projected costs of the various alternatives, NPS recalculated the costs of alternatives A and B using the new method.

The concept that Alternatives A and B had not changed from the February 2000 Draft to the 2003 *Supplemental Draft GMP* applies to the zones, which indeed, did not change. Stated another way, the zones and zone prescriptions from the earlier draft were carried forward verbatim to the 2003 *Supplemental Draft GMP* and incorporated by reference.

There has been some confusion over the use of the word "Same" in the text pages that accompany each of the development maps in the *Supplemental Draft*. Because the preferred alternative of the 2003 draft included a great many more sites, roads, and trails than the previous draft, use of the word "Same" was intended to avoid clutter in the text by referring to the immediately preceding description of the preferred alternative. The single word "Same" was used as a time-saving choice over the phrase "Same as Preferred," and was meant to be used only where the proposal in Alternative A and/or Alternative B was exactly the same as the preferred alternative.

**P6.** *Comment: The GMP should apply the same zones to different broad visions of direction. That way the public could see the real effect of zoning. As presented, there appears to be no significant difference.*

Response: The preparation of a general management plan entails the development of different alternatives (i.e., "broad visions of direction"). As noted in the response to comment P3, each alternative is characterized by its own configuration of individualized management zones. The zones will drive future management decisions. Therefore, repeating the same zones from alternative to alternative would defeat the purpose of planning. The various alternatives in the GMP differ significantly in the types of future decisions they would make possible. Again, it is the differences among the types and configurations of management zones that distinguish the various alternatives.

**P7.** *Comment: The alternatives in the Supplemental Draft GMP should be carried to the same level of detail.*

Response: 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 *Supplemental Draft GMP* goes beyond the standard GMP format and includes a roads and trails plan for each alternative. Each of the action alternatives contains a detailed proposal for a roads and trails system. This additional level of detail was requested by many of those who commented on the original Draft GMP. The NPS provided an integrated GMP/implementation plan because of strong public demand for specific information on roads and trails management. In essence, the GMP for the National Area is a combined general management plan and implementation plan for roads and trails. Other implementation plans for other management issues will be prepared as needed after the GMP is finalized and approved.

**P8.** *Comment: The Supplemental Draft GMP states that "a sustained, moderate level of management effort would be anticipated in working towards" the desired conditions of the Natural Environment Recreation Zone. In contrast, "[m]anagement of resources and any visitor use within the [Sensitive Resource Protection Zone] would be intensive." Without an intensive effort in the protection of recreation, NPS' intensive efforts in the protection of resources will result in a loss of the recreational opportunities that Congress meant for people to enjoy.*

Response: Congress intended that the National Area be managed with an emphasis on healthful outdoor recreation. The Preferred Alternative reflects such a management emphasis by increasing opportunities for various recreational activities, including, among others, bicycling and horseback riding. But while the plan would increase opportunities, it would do so only in a context of resource protection. By law and policy, NPS is required to expend the level of effort necessary to preserve unimpaired the resources for which the National Area was established.

**P9.** *Comment: Alternative D presumes a level of funding for the National Area that is more than twice the current level. Achieving this level of funding is most unlikely. Each of the alternatives should be analyzed using the same funding level.*

Response: The General Management Plan is, as its name denotes, a general long-range document that is meant to cover a 15- to 20-year time period. The particulars of implementing the plan will depend upon perceived needs over time, funding availability, personnel resources, and public support. Even if funding is not made available to accomplish everything in the Preferred Alternative, much that is unique to this alternative can still be implemented. Each of the alternatives reflects a different vision for managing the National Area, and each of these visions would entail a different funding level to implement. Analyzing each alternative at the current funding level

would either mean (a) assuming that certain items in each alternative would never be implemented, or (b) limiting options to such an extent that the alternatives would not be sufficiently different from one another to constitute a valid range of alternatives.

**P10.** *Comment: The alternatives in the GMP should be based on data from visitation studies, rather than the opinions of National Area staff. Visitor needs take a back seat in the plan to resource protection.*

**Response:** The GMP is based upon a variety of supporting information, including public input, visitor statistics, natural resource studies, cultural resource surveys, comprehensive plans and land use plans from surrounding counties and communities, supporting data from the Corps of Engineers, environmental impact reports, Big South Fork guidebooks, and input from NPS subject-matter experts. Public input is described in the consultation and coordination section of the plan and the supporting documents are listed in the selected references. The GMP preferred alternative provides a high-quality visitor experience while protecting National Area resources.

**P11.** *Comment: The plan should devote more attention to activities such as kayaking, swimming, wading, and fishing. Better put-ins and takeouts should be considered for the river, as well as a firing range.*

**Response:** Details of the sort requested in the comment are not typically provided in general management plans, but are left to subsequent implementation plans. It is understood that water sports will be concentrated at waterside development zones, and zones where such activities could take place or originate are described in the plan. Details regarding put-ins and takeouts will be taken up at the implementation plan stage. The Final GMP states in Chapter 3 (map 8, site 2, "headquarters development area") that NPS will evaluate opening the firing range to the public.

**P12.** *Comment: Fentress county has some of the most beautiful natural and geologic features in the entire National Area, including Wildcat Den natural bridge, Accordion Bluff rock shelter, the South and North Sawtooth area, Fiddler's Arch, and the confluence of Laurel Fork and Hatfield Creek bluffs. The Supplemental Draft GMP does not provide adequate visitor use facilities in Fentress County. For visitation to grow and benefits to accrue to the local economy, scenic attractions must be made accessible through development of an increased number of visitor facilities. More paved parking, sanitary facilities, water and paved paths (for handicapped persons) should be developed in at least the Sawtooth Overlook and Confluence Bluffs picnic areas. Parking, trails, and related facilities suitable to all ages and abilities should be provided to the Laurel Fork features. The amount of parking provided in the proposed development zones at Darrow Ridge will be inadequate over a 20 year period. The plan should be revised to provide access to features in Fentress County, and should include development that will accommodate all ages, disabilities, and interests.*

**Response:** Additional development and facilities to the degree described in the comment could impact sensitive resources, detract from the rustic character of the National Area, and are beyond the scope of what would conceivably be funded during the life of the GMP. The preferred alternative does, however, provide 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). As stated in the response to Fentress County comment #6, the preferred alternative includes 13 new proposed access zones (trailheads) in Fentress County along the boundary of the National Area – nine in the Darrow Ridge area alone – in an attempt to meet growing development pressures.

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 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

## **Management Zones**

**P13.** *Comment: The proposed management zones should recognize suitability for uses in a more regional context. The National Area is better suited for biking and horseback riding than Great Smoky Mountains National Park, and the Smokies are better suited for backpacking. The zones in the draft plan should reflect this difference in suitable uses.*

**Response:** The management of each NPS unit is guided first and foremost by its enabling legislation, and secondarily by other applicable laws, regulations, and policy documents. Therefore, management zones for an individual park must be drawn with reference to the legal requirements and resource considerations applicable to the unit itself, rather than what uses may be taking place elsewhere in the region. In the case of the National Area, Congress has directed that the national recreation area concept shall apply. By definition, the national recreation area concept calls for a greater emphasis on recreation than is found in other types of park units, and that emphasis is reflected in the preferred alternative. The preferred alternative calls for more miles of trails per square mile (including more horse and bike trails) than is available in Great Smoky Mountains National Park. For example, Great Smoky Mountains National Park has 0.7 miles of horse trail per square mile, whereas the GMP for the National Area proposes 1.1 linear mile of trail available to horse use per square mile.

- P14.** *Comment: The sensitive resource overlay should be continuous along the Big South Fork between Leatherwood Ford and Bear Creek and along Station Camp Creek and Laurel Fork of Station Camp. It should also extend farther up into Troublesome, Difficulty, Bandy, and Parch Corn creeks.*

Response: The sensitive resource protection zone includes all of the areas identified in the comment. As stated on page 17 of the Supplemental Draft, "All natural, perennial watercourses and their riparian areas and floodplains would be included" in the sensitive resource protection zone. The sensitive resource overlay was created to highlight a concentration of sensitive resources within a given geographic area. While not every sensitive resource falls within the overlay, they still lie within the sensitive resource protection zone. The river between Leatherwood Ford and Bear creek is a good example of this.

- P15.** *Comment: The Preferred Alternative should include an analysis of sites within the sensitive resource overlay that are currently highly developed or receive high visitation. The plan should single these sites out for analysis, and propose appropriate monitoring and mitigation actions.*

Response: The comment calls for a level of detail and analysis that is beyond the scope of a general management plan. As set forth in the final plan, the sensitive resource zone sets forth desired future conditions and management prescriptions. To the extent that visitor usage results in a deviation from these desired future conditions, specific response actions can be designed and carried out at the implementation stage to address particular problems.

- P16.** *Comment: The plan should make clear that the sensitive resource overlay areas indicated on the maps are not intended to be static and finite.*

Response: The plan has been revised to indicate that the sensitive resource overlay areas can be adjusted in the future if additional sensitive resources (e.g., endangered species, archeological resources) are identified that warrant an adjustment of the overlay areas.

- P17.** *Comment: The National Park Service should not take any action that would remove or significantly alter any recreational opportunities based upon an arbitrary percentage of visitor dissatisfaction factors. Social standards and social indicators can be used improperly and should not be the basis of management action. NPS should do everything in its power to meet legislated mandates to provide recreation at a level commensurate with the national recreation area concept. Recreation should be NPS' primary resource management purpose.*

Response: As noted previously, NPS is required by law to provide recreational opportunities at the National Area in a manner that will leave the area's resources unimpaired for future generations. The final plan does this by adhering to the national recreation area concept while assuring resource protection. Visitor dissatisfaction factors are not intended to be the sole basis of management action, but would merely point out potential problem areas that merit additional, independent investigation by NPS. Where appropriate, NPS would take action based on its own independent evaluation of a particular situation.

## **Development Sites**

- P18.** *Comment: The proposed number of parking spaces at parking areas is too small to accommodate likely future increases in equestrian usage. Each parking area for horseback riders should have a minimum of 12 spaces. In addition, parking needs to be increased for horse trailers, as many people are now pulling very long trailers and take up more room than previously. Access roads to existing trailheads need to be widened so horse trailers can pass each other.*

Response: The final plan has been revised to take out references to a specific number of parking spaces at trailheads or other development zones. This level of detail will be included in the site plans for individual trailheads and parking areas. Addressing such detail in the site plans will allow NPS planners to deal appropriately with conditions as they exist at the time of development, rather than adhere to prescriptions that may have been drawn up years before and may no longer meet current needs. Due to funding constraints and concerns with respect to maintenance and resource protection, the design standards applicable to individual roadways will remain as described in the Supplemental Draft GMP.

- P19.** *Comment: Why is the \$330,000 developed campground at Mt. Helen Trailhead missing from Alternative B? Why has the \$4.6 million development at Bear Creek Horse Camp disappeared? These developments were in the February 2000 draft and both should have been carried forward, based on the wording of the Supplemental Draft GMP.*

Response: The intent of the wording of the Supplemental Draft GMP was to indicate that the heart of the 2000 draft – the management zones – was being carried forward to the Supplemental Draft. As noted in response to comments P3, P5, and P6, the fundamental components of the general management plan are the management zones and corresponding management prescriptions. Details regarding development are considered less important and in most instances are omitted from the GMP entirely and left for future implementation planning. In the present instance, the development at the Bear Creek Horse Camp was deliberately dropped from the Supplemental Draft GMP because it was determined that the Bear Creek area was not appropriate for a large-scale concession operation. It was also felt that both visitors and the local economy would reap greater benefits if necessary services were to be

provided outside the National Area by local business people. As for the developed campground at Mt. Helen Trailhead, this potential new site was included in the Supplemental Draft GMP. Its description can be found on page 107 of that document.

- P20.** *Comment: None of the horse trailhead facilities in Alternative D are described as having sanitary facilities. Staging areas for other activities have sanitary facilities. Why the different treatment? The draft states that improper disposal of untreated human waste in areas without toilet facilities currently causes minor water quality problems. Please cite the scientific study that shows where this is occurring.*

Response: Inclusion of sanitary facilities at certain trailheads was meant to give an idea of the types of facilities that could be provided in those areas. It was not the intent to suggest that sanitary facilities would only be provided where specifically indicated. Needs for particular areas will be assessed at the site planning stage and sanitary facilities will be provided as appropriate. Discussions of water quality problems at areas without toilet facilities can be found in two documents cited in the Selected References. The two documents are cited as National Park Service (1997a) and National Park Service (1986).

- P21.** *Comment: The plan should include a shelter along the tree line of the Appaloosa Field. Many groups currently use a collection of tarps and canopies for their ride briefings.*

Response: The plan has been revised to indicate that the developed area at Bandy Creek may include a shelter at the Appaloosa Field.

## **Roads and Trails**

### **General**

- P22.** *Comment: The maps in the Supplemental Draft GMP contain errors.*

Response: The maps have been revised to include corrections identified by persons commenting on the *Supplemental Draft*.

### **Road system: general comments**

- P23.** *Comment: The foot and bike trail classification standards at p. 276 should be strengthened. All foot and bike trails should have barricades that will prevent access by unauthorized users, i.e., motorized vehicles. Trail standards should include criteria for signage and blazing. Signs should reflect policy that all trails are closed to motorized vehicles unless posted open to them. Maintenance and monitoring standards should be established for each trail class.*

Response: NPS believes that the issue alluded to in the comment is essentially a law enforcement issue and should be dealt with on a case-by-case basis. Rather than mandating that the National Area incur the expense of signing and gating all trails, the final plan allows the Superintendent to use his or her authority to gate those trails experiencing extensive amounts of unauthorized motorized use. Trail signage, blazing, and monitoring standards are outside the scope of the GMP. Trail maintenance standards are covered in the annual trail management scope of work in the appendix.

- P24.** *Comment: The plan should provide more opportunities for use of four-wheel drive vehicles on two-track roads over fifty inches.*

Response: Opportunities for this type of use are adequate, given that four wheel drive vehicles of the type indicated can use unimproved roads and multiple use trails throughout the National Area. Creating and maintaining additional trails specifically for this type of use would place a strain on the National Area's maintenance and law enforcement staffs and could result in unacceptable cumulative resource impacts.

- P25.** *Comment: The proposal to restrict oversize vehicles on Highway 297 may interfere with interstate commerce and curtail recreation.*

Response: The proposal to evaluate the prohibition of oversize vehicles on Highway 297 is made for the purpose of protecting resources and increasing safety for all persons using this road, including visitors to the National Area. During the time that the planning process has been underway, there has been at least one fatality from an oversize vehicle traveling through the gorge on Highway 297, and numerous instances of resource and property damage. Any move to evaluate the prohibition of oversize vehicles on Highway 297 would be made in full consultation with state and local authorities having jurisdiction over this roadway. In addition, advice would be sought from legal counsel in order to avoid any unlawful restrictions on interstate commerce.

**P26.** *Comment:* “The authorizing legislation requires all other existing roads in the gorge to be maintained. So it would appear that all existing roads at the time of authorization must remain open to non-motorized use. Where is this discussed in the draft?”

Response: The National Area’s enabling legislation states that “All other existing roads in the gorge area shall be maintained for nonmotorized traffic only, except that nothing in this section shall abrogate the right of ingress and egress of those who remain in occupancy under subsection (c)(2) of this section.” 16 U.S.C. 460ee (e)(2)(D). The overarching purpose of the section in which this language appears is to limit impacts to the sensitive resources in the gorge. It does this by specifying the locations where NPS “may” construct or improve motorized access routes. In addition, subsection (e)(2)(E) specifically states that any maintenance activities “of roads and facilities in the gorge as permitted by [not as required by] this section shall be accomplished by the Secretary in a manner that will protect the declared values of this unique natural scenic resource.” 16 U.S.C. 460ee (e)(2)(E). Therefore, the language cited in the comment does not require NPS to maintain all existing gorge roads in perpetuity for recreational pursuits. Rather, this language means that existing roads in the gorge, to the extent they are maintained for recreation, may only be used by non-motorized traffic.

**P27.** *Comment:* The Burnt Mill Bridge needs to be fixed and the road re-opened. The National Park Service should have no control over the bridge because the bridge is county-owned.

Response: The decision to close Burnt Mill Bridge was made by Scott County, which owns both the bridge and the approach road. The National Park Service has no control over the bridge and did not participate in the decision to close it. Responsibility for building a new bridge lies with Scott County and the Tennessee Department of Transportation.

## Trail system: general comments

**P28.** *Comment:* All trails that are not made part of the official system by the GMP should be expressly designated as “closed.” Rather than simply abandon maintenance, NPS should subject these trails to a plan for systematic closure.

Response: In order to ensure that the status of all trails in the final GMP is clear, the plan has been revised to specifically state that all trails not part of the official system are designated as “closed.” Where necessary to prevent resource damage, NPS will physically close trails and prepare a prescription for rehabilitating degraded trail sections. The National Area lacks the staff and funding to simultaneously maintain the official trail system and physically close all trails that are not part of the official system.

**P29.** *Comment:* With nearly 300 miles of roads currently open to motor vehicles in the National Area, the plan should not open any additional roads, trails, or routes to motor vehicles. The mixing of motorized and non-motorized use on many trails is problematic, and may create safety issues.

Response: The roads and trails plan in the preferred alternative is predicated on multiple and shared use of many existing trails in order to accommodate diverse user groups and afford access to a variety of recreational opportunities. Under the preferred alternative, specified motor vehicles are allowed on both roads and multiple-use trails. Past experience at the National Area indicates that mixing motorized and non-motorized use on multiple-use trails has not created a safety problem. On those multiple-use trails where vehicular traffic is perceived to be moving too fast, the trail standard will be narrowed and speed reduction devices such as speed bumps and warning signs will be employed.

**P30.** *Comment:* The Supplemental Draft GMP should be modified such that significant portions of the National Area would have lower trail densities and fewer access points than currently proposed. Access points would almost double (from 24 to 44) and trail mileage would increase by 32%. Horse trails would increase by 44%. Great Smoky Mountains National Park is over four times larger than the National Area, but has only 800 miles of trails, which is completely adequate. Excess access points are expensive to maintain and difficult to patrol adequately for illegal uses.

Response: The proposed 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 might 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.

**P31.** *Comment:* NPS’ efforts to accommodate various interests jointly have lead to a chaotic pattern of numerous access points feeding into the trail system. These access points will create rather than solve management problems. Most of the proposed new access points should be removed.

Response: It should be noted that in recent years a number of residential developments have been constructed adjacent to the National Area that take advantage of local recreational opportunities. We expect this trend to continue and perhaps accelerate in coming years.

The proposed system of access points is designed to serve visitors from these areas as well as all other visitors to the National Area. As noted in chapter 3 of the GMP, all access points must be open to use by the general public. It is important to provide an adequate number of convenient access points to serve the visiting public. Otherwise, social trails may proliferate and resource degradation may increase.

**P32.** *Comment: The preferred alternative is deficient in that it fails to explain how the National Area will simultaneously increase trail construction and protect Area resources. Current budgets are inadequate to maintain the present system, especially those trails used by horses. It is unlikely that future funding increases will be sufficient to cover maintenance for an expanded system. How will the National Area meet its current maintenance needs if it attempts to build the new trails and facilities called for under Alternative D? How will the need for site restoration and resource monitoring be balanced against new construction projects?*

Response: The final general management plan is, as its name implies, a general guidance document designed to cover management of the National Area over a 15 to 20 year period. The plan sets forth a vision for managing the area given adequate funding and staffing levels to implement the particulars of the plan. However, there is no guarantee that specific projects in the plan will be built in the near future, or at all. Implementation of many details of the plan will depend on funding availability. As noted on page 9 of the Supplemental Draft GMP, NPS will only construct those projects that it has the resources to build and maintain.

**P33.** *Comment: Shared use of trails should only be permitted where such use is safe for all visitors and will not adversely affect streams and other resources. Horses and motorized vehicles are not compatible with hikers in many circumstances.*

Response: The preferred alternative calls for shared use only in those areas where experience indicates shared use is safe for all visitors. Similarly, every effort has been made to avoid siting any trails where their use could cause adverse impacts to National Area resources. Due to the nature of the local terrain, however, it has not been possible to site all trails away from waterways. It is understood that user conflicts sometimes occur between hikers and other user groups. We believe that these problems can be effectively managed by providing visitor education at trailheads and by providing hiking-only trails for those hikers who do not want to encounter horses, bicycles or vehicles.

**P34.** *Comment: Horseback riders, hikers, and mountain bikers can share the same trails. User education at trailheads can forestall many user conflicts.*

Response: It is true that all of these user groups, when informed of possible risks and proper trail etiquette, can use many of the same trails. At the same time, however, many members of the public have expressed the view that it is appropriate for each of these groups to have their own trails. The final plan thus provides both dedicated and shared-use trails.

**P35.** *Comment: The proposed trail system lacks an overriding design. The plan should contain additional, or different, trails. (Proposed changes specified in various comments.) The proposal would delete "redundant" trails when such trails provide desirable loops and shorter trips. The lack of short loop trails makes single-day horse trips infeasible for weekend visitors, with adverse effects for the local economy. Various trail segments should be added to the system to create loops.*

Response: The criteria used for including trails in the official trail system are set forth in chapter 3 of the GMP. A number of commenters made specific suggestions for adding trail segments to the final plan. Although each of the suggested trail segments had previously been considered by the planning team prior to release of the Supplemental Draft GMP, the team reconsidered all suggested trail segments in response to public comment. Some of the proposed additions had actually been included in the Supplemental Draft GMP, but under names that may have been unfamiliar to particular commenters (see, e.g., the Little Cliff – Christian Cemetery Trail and the Darrow Ridge Road – North White Oak Creek – Wildcat Den Trailhead). Other loops (or, more specifically, trail segments that would create a loop) had been intentionally excluded from the Supplemental Draft. These segments were reconsidered by the planning team, but they do not meet the selection criteria and have not been included. In particular, the planning team rejected trails on steep slopes, trails that would result in a proliferation of river crossings, or trails that otherwise would require disproportionate maintenance effort to prevent adverse resource impacts. The Watson Cemetery Trail is an example of a route that is not included in the official trail system due to adverse resource impacts.

**P36.** *Comment: The existence of social trails is used as a justification to limit or control use. Yet the design of the trail system, with trails placed far from special features, virtually guarantees social trails. "And since the GMP proposes a hike anywhere policy, social trails are entirely legal and acceptable. But they are not. Which is it?"*

Response: Few known special features in the National Area are excluded from trail access in the GMP. The concept in many locations is that one drives or rides a bicycle or horse near the special feature, then walks the remaining distance. This design limits resource damage and social impacts that can occur at the special feature. The few instances where a special feature does not include trail access were to protect the public or National Area resources. Ranger patrols will check for the beginnings of social trails and appropriate management actions will be taken to prevent their proliferation. Social trails are not acceptable and all social trails will be closed to the extent practicable. While it is true that hikers are not limited to designated routes under the GMP, this aspect of the plan merely recognizes that (a) foot traffic is extremely difficult to regulate, and (b) impacts from foot traffic are generally much less pronounced than equestrian and vehicular use, activities which involve more soil disturbance (see Marion, 2004, draft report). However, foot traffic on social trails does cause adverse impacts. Accordingly, the Superintendent can and will act to close and rehabilitate social trails as necessary.



**P37.** *Comment: The GMP does not adequately address the environmental impacts of the “hike anywhere” policy. Off-trail hiking can damage sensitive resources. In addition, this policy is unfair to other user groups. Hikers would be allowed to hike on unofficial and other “closed” trails that other user groups could not use. If NPS is establishing an official trail system, hikers should be restricted to designated trails. Restrictions should be placed on all off-trail activities, not just competitive events.*

Response: As the comment notes, in some instances off-trail hiking can damage sensitive resources. When such impacts become evident or can reasonably be anticipated, the Superintendent has the authority to close specific areas to foot traffic. However, for the reasons noted in response to comment P36, the plan provides that hikers can go “off trail” as long as adverse impacts to resources do not occur. The plan has been revised to clarify that foot travel would be allowed on both designated trails and off-trail so long as no adverse impacts to resources were occurring. (Note: foot travel would be prohibited on those administratively closed trails that are undergoing active restoration/rehabilitation.) Restrictions are placed on off-trail competitive events because these activities have the clear potential for adverse impacts due to potentially large numbers of participants.

**P38.** *Comment: The Supplemental Draft GMP continues the poor practice of using old roadbeds for multiple-use trails. Siting trails on old roadbeds results in soil erosion and high maintenance costs. The National Area should construct new, properly designed trails, which will wear better and be easier to maintain. Geomorphic processes are a greater determinant of trail degradation than types or levels of use. The vast majority of impacts take place at low levels of use. Additional levels of use cause few additional impacts. This renders inaccurate most of the impact analysis in the draft plan.*

Response: Old roadbeds are indeed often unsuitable locations for trails. Old roadbeds are often too steep, deeply incised, poorly drained, and are a source of erosion. Unfortunately, many trails in the National Area in the past were built on old roadbeds. The plan, however, does not continue the practice of citing trails on old roadbeds. The trails on the development maps only represent conceptual corridors, not specific trail locations. The plan has been revised to state that old roadbeds are generally unsuitable locations for trails. All new trails will conform to the revised trail standards proposed in the Final GMP, which include slope and drainage configurations. The long-term goal for those trails currently existing on old roadbeds where resource damage is occurring is to relocate and rebuild the trail at an appropriate grade with the necessary drainage characteristics. The impact analysis addresses both geomorphic processes and use levels as contributing factors to environmental impacts. Studies commissioned by NPS indicate that impacts at the National Area increase with use levels.

**P39.** *Comment: The plan needs to provide more specifics regarding the nature and timing of monitoring activities with respect to trail conditions. Neither the trail standards nor maintenance scope in the Supplemental Draft have any parameters that would provide monitoring guidelines or actions to be taken when adverse conditions occur. What are the standards for restricting, rerouting, and closing a trail? What are the indicators that a trail does or does not have the ability to sustain the use that is occurring? NPS has not presented a cohesive, understandable trails protection program that embodies trail design, standards, monitoring, and maintenance.*

Response: Trail monitoring and indicators and standards 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.

**P40.** *Comment: The Supplemental Draft GMP calls for the continued use of outdated trail standards and maintenance methods. Sections of steep trail should be relocated and constructed with a small bulldozer, using a full-bench cut with reasonable grades (not exceeding 10% overall), and with sufficient trail outslope. Water bars should no longer be used. With proper construction methods, trail hardening would not be necessary. The large sums to be devoted to monitoring trail conditions would be better spent redesigning and reconstructing trails.*

Response: The Road and Trail Classifications and Standards have been revised to reflect grade, full-bench construction, outslope, backslope, etc. As funding is secured to reconstruct and/or relocate trail sections, every effort will be made to comply with the new standards, within design limitations. Even with reconstruction or relocation, trail hardening and the use of drainage structures will still need to be used in the management of the National Area’s trail system.

**P41.** *Comment: The National Area should use bulldozers for trail construction within the Gorge. The enabling legislation allows motorized equipment in the gorge; preventing the use of motorized equipment in the gorge is inefficient and expensive. Great Smoky Mountains National Park uses a small trail dozer for construction.*

Response: The use of motorized transportation is allowed in the gorge area for administration of the National Area. The use of bulldozers is one of the many options available for trail construction and maintenance and would be considered, taking into account the preservation of the scenic, biological, archeological and historical resources of the river gorge areas.

- P42.** *Comment: The draft plan allows some use of crusher run stone for tread repair on trails. This practice should be prohibited. In the past, use of crusher run on long stretches of trail has resulted in the erosion of gravel into streams and the river. Prevention of erosion should be addressed via proper trail construction techniques with attention to decreasing grade through the use of switchbacks. With such techniques, trail hardening will be all but unnecessary.*

Response: The Road and Trail Classifications and Standards have been revised to reflect the target grades necessary to reduce erosion and maintenance along our trail system. As funding becomes available, these target grades will be implemented, where practical, through reconstruction and relocation efforts. Trail hardening will continue to be necessary in some locations, regardless of grade. The National Area's Maintenance Division continues to explore alternatives such as the use of red dog, geotextile fabric (to reduce the amount of material necessary to harden the surface) and different drainage structure designs.

- P43.** *Comment: Use of motorized equipment should be prohibited under any circumstances in the gorge area, except for the occasional chainsaw and to maintain the road access authorized by the enabling legislation.*

Response: The enabling legislation establishing the National Area prohibits motorized transportation with a number of exceptions, including for administrative use of the area. The legislation does not prohibit the use of motorized equipment, and there are circumstances in which the use of such equipment is necessary or desirable to accomplish management objectives in the gorge, as when conducting environmental restoration or pollution abatement activities.

- P44.** *Comment: The GMP should include a cost-benefit analysis with respect to construction and maintenance of trail segments. A high-priced hiking trail that receives little use is not an efficient use of public funds.*

Response: A cost-benefit analysis of the type called for in the comment is beyond the scope of the GMP. In developing the official trail system, the planning team has taken pains to include only trail segments that are likely to be used, can be built and maintained for a reasonable cost, and will allow outstanding recreational opportunities while protecting National Area resources.

- P45.** *Comment: Trails designated for closure due to reroute should remain open to users until the rerouted trail is put into service. For example, on Map 10, the trails currently being used should not be removed for horse use until the replacement trail (trail 23) is built.*

Response: As a general rule, trails designated for replacement can remain open until a replacement trail is built. However, when a given trail or trail section poses a safety issue, or is so degraded that resources are being adversely affected, the Superintendent has the discretion to institute a closure prior to construction of a replacement trail.

- P46.** *Comment: The Burke Cabin should be retained as a destination point.*

Response: The GMP has been revised to indicate that the Burke cabin will be studied to determine if it is a necessary and appropriate component of the recreational experience at the National Area.

- P47.** *Comment: The designation of the Gentlemen's Swimming Hole Trail (Segment B) and Meeting Bend Trail as multiple use is inconsistent with National Register designation of Historic Rugby. The artery leaving the historic Laurel Dale Cemetery adjacent to the existing trailhead sign should be gated to allow foot traffic only for this entire loop. This segment is part of the cultural resources of Rugby protected by the National Register listing. The entire area of this loop trail should be designated a safety zone since there is extensive year round use of the area by visitors and residents.*

Response: The plan has been revised to indicate that the Gentlemen's Swimming Hole Trail (Segment B) and Meeting Bend Trail are designated for foot traffic only, with the exception that oil and gas well access is still needed for the operator(s). NPS will consider gating these trails as resources permit. The area around these trails cannot be designated as a safety zone because the location does not currently meet the written park policy and criteria for a safety zone, but NPS will consider designating a no-hunting zone within that portion of the Rugby National Historic District that lies within the National Area.

- P48.** *Comment: The White Oak Bend Road (Map 11, Road 24) is designated for "road uses." This road should be gated and designated for foot traffic only. This road is part of the original road/trail system of the Rugby town plan and as such is protected by the National Register listing. Further, this road begins in a residential neighborhood and is owned by Historic Rugby. The intent is to treat this road as a dead end cul-de-sac, with the roadway beyond to be gated. The area in the vicinity of this road should be treated as a safety zone.*

Response: The plan has been revised to indicate that White Oak Bend Road is designated for foot traffic only, with the exception that oil and gas well access is still needed for the operator(s). NPS will consider gating this trail as resources permit. The area around this trail cannot be designated as a safety zone because the location does not currently meet the written park policy and criteria for a safety

zone, but NPS will consider designating a no-hunting zone within that portion of the Rugby National Historic District that lies within the National Area.

**P49.** *Comment: The Brewster Bridge Campground (Map 11, Site 3) should be included in the Preferred Alternative. A demonstrated need for such a facility currently exists. Also, a visitor contact facility should be constructed on the south side of the National Area, either in Rugby or in the area near the new Highway 52 bridge.*

**Response:** Comment noted. NPS believes that the Preferred Alternative constitutes the best approach for providing visitor services to the National Area, when considered as a whole. The Brewster Bridge Campground is not included in the Preferred Alternative because the National Area wishes to encourage private entrepreneurial development outside the boundary of the park, with economic benefits accruing to local merchants and service providers. An NPS campground at Brewster Bridge would compete with, and possibly harm, the private campgrounds in the vicinity. Chapter 3 of the GMP states that the NPS would provide visitor information services in Rugby.

## Bicycle Trails

**P50.** *Comment: The Supplemental Draft GMP offers too few opportunities for bicyclists. Allowing bicyclists to share trails with hikers and other user groups expands opportunities for bicyclists without causing the environmental impacts that would follow from creating a dedicated trail system for bicycles. Mountain bikers need longer trails to justify traveling to the area.*

**Response:** 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 would 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).

**P51.** *Comment: The plan should be revised to convert many/most of the trails into multiple use trails (i.e., hiking, biking, and horseback riding). Contrary to assertions in the Supplemental Draft GMP, conflicts between horses and bicycles are quite manageable.*

**Response:** In most instances conflicts between horses and bicycles are manageable. The final plan, like the Supplemental Draft GMP, provides that most horse trails would be open to horses, hikers, and mountain bikes (the reader should note that the tread surface on many horse trails is not considered suitable for hiking and biking). However, the planning team determined, based in large part on public input, that it would be desirable to have some horse trails that were dedicated solely to horses. It is unclear at this point what impacts, if any, allowing bicycle use on many/most hiking trails would have on National Area resources and the visitor experience. The experimental proposal for shared use on the Grand Gap Loop is designed to provide some answers to this question.

**P52.** *Comment: By limiting bicyclists to weekdays, the Grand Gap Loop “experiment” appears designed to fail, because some riders will inevitably attempt to ride on weekends.*

**Response:** The point of the time-share experiment is to determine whether bike usage on hiking trails would adversely affect National Area resources or the visitor experience of hikers. The presence of some bike riders on weekends would not, in itself, render the experiment a failure. However, any pervasive failure by bicyclists to honor the timing restrictions could adversely affect the visitor experience on what is primarily a hiking trail. Any such failure could potentially render the experiment a failure.

**P53.** *Comment: If time sharing of trails is pursued, the amount of time allotted to bikers and hikers should be equitable. Bikers should have at least one weekend day to ride, since many riders, like hikers, have only weekends available.*

Response: Time sharing on the Grand Gap Loop will be pursued on an experimental basis to determine whether bike use on a trail specifically constructed for hikers can be accommodated without damaging the trail or causing adverse resource or social impacts. As an experiment, the proposal necessarily limits the periods that bicyclists can use this trail because the Grand Gap Loop is a popular weekend destination for hikers. Additional full-time bike riding opportunities have been added to the final plan in order to address concerns that the Supplemental Draft GMP provided too few opportunities for bicyclists.

## Hiking trails

Comment: *The John Muir Trail is a legislated Tennessee State Scenic Trail. The Supplemental Draft GMP combines Segment I of the JMT with the River Trail West in order to alleviate degradation from horse traffic in this lowland area. Horse traffic should not be allowed on the JMT.*

Response: Under Tennessee law, designated state scenic trails are generally restricted to foot traffic only. However, horses and bicycles can be used on segments of scenic trails where deemed appropriate by the State. The Supplemental Draft GMP was submitted to the State for review and comment and no objection has been received to routing horse traffic on Segment I of the JMT. NPS also believes that the legislative provision in question only applies to those portions of the JMT controlled by the State.

The cited section of the River Trail West is experiencing resource degradation. No feasible alternative, other than the JMT, exists in the vicinity to route the horse trail to avoid continued resource damage from sedimentation.

Comment: *The plan should keep bicycles off of Grand Gap Loop.*

Response: Comment noted. NPS believes it is appropriate to conduct the Grand Gap Loop experiment in order to determine whether bicyclists can be afforded access to more scenic parts of the National Area without adversely affecting resources or the experiences of other visitors.

Comment: *The draft plan states that hiking trails will be constructed by hand. This is a very costly and slow method of trail construction. Machines should be used to perform such tasks.*

Response: The plan has been revised to state that machines will be used in trail construction where appropriate.

Comment: *Traversing foot trails should be permitted in only a very small number of rock shelters.*

Response: Under the final plan, rock shelters are included in the sensitive resource protection zone. Accordingly, trails will only be located in these areas to the extent that they can be built and maintained in a manner consistent with the management prescriptions for this type of sensitive resource.

## Horse trails

Comment: *The draft GMP should include trails in the Big Woods/Hurricane Ridge area.*

Response: The Supplemental Draft GMP includes an equestrian trail in the Big Woods/Hurricane Ridge area (Long Ridge Trail), but major portions of this trail were inadvertently omitted from Map 8. The final version of Map 8 has been corrected to show this trail. 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.

Comment: *The proposed increase in horse trails is disproportionate to the increase in other types of trails. Altogether, 205 miles of trail (plus 20 miles seasonally) would be available to horses. This is grossly excessive. Horses have impacts that far exceed their numbers. The density of horse trails and the number of access points for equestrians should be reduced.*

Response: Over time, horseback riding has grown to become one of the most popular activities at the National Area. NPS believes that providing multiple opportunities for horseback riders is consistent with the national recreation area concept. Impacts associated with horseback riding and other trail uses are attributable to a number of factors, including poor trail design (Marion, 2004, draft report). Under the final plan, NPS will rehabilitate existing trails to the extent resources allow, and construct any new horse trails in accordance with improved design standards. These standards are described in the Appendix of the final plan.

Comment: *The National Area caters too much to horseback riders. Horses tear up trails (especially in wet conditions) and over time make trails unsuitable for other user groups, especially mountain bikers.*

Response: As noted in response to comment P59, NPS believes that providing opportunities for horseback riding is appropriate for the National Area. Existing trails will be rehabilitated and relocated away from wet areas to the extent possible. New trails will be constructed to design standards that minimize impacts from horses.

Comment: *The Supplemental Draft GMP gives the misleading impression that more miles of horse trail will be available, when in fact fewer miles will be available because horseback riders will be limited to designated trails. The GMP should show the location and mileage of all currently available trails and explain why trails were deleted from the proposed official trail system.*

Response: Please see response to comment P65. More miles of officially designated and maintained horse trails will be available under the Preferred Alternative than are currently available. The official trail system was developed by NPS staff using the criteria set forth in chapter 3, with extensive input from the public during public meetings, focus groups, and open houses. Existing trails that do not appear in the official system were deleted due to problems with maintenance, visitor safety, law enforcement issues, or adverse environmental impacts. Under the final GMP, visitor use will be restricted to the official trail system in order to enhance visitor safety, insure adequate maintenance, and prevent adverse effects to National Area resources. The preferred alternative (Alternative D) provides 182 miles of designated horse trails, plus 49 miles of multiple use trails on which horses may ride for a total of 231 miles of trails available to equestrians. This equates to more than one linear mile of horse trail per square mile of the National Area. The NPS believes this amount of horse trails is sufficient for current and potential future equestrian use within the 15 to 20-year life of the GMP, while still protecting National Area resources.

Comment: *Keep hikers and horses separate.*

Response: Comment noted. It is NPS' experience at the National Area that hikers and horses can use the same trails without either user group endangering the other. Education of area visitors plays a key role in allowing horseback riders and hikers to use the same trails safely. Such educational efforts will continue under the final GMP. The preferred alternative also provides 141 miles of hiking-only trails for those visitors not wishing to encounter other user types.

Comment: *Horses should be kept out of all areas included in the Sensitive Resource Protection Zone, including wetlands and streams. Existing trails should be re-routed out of wetlands.*

Response: Given the topography of the National Area, it is impossible to avoid stream crossings and wet areas altogether. Nevertheless, NPS intends to rehabilitate existing horse trails and construct any new trails in such a way as to minimize impacts to riparian areas and wetlands.

Comment: *The Supplemental Draft GMP requires all horseback riders to enter the National Area at trailheads that are part of the officially recognized and maintained trail system (p. 41). Riders would not be able to enter the National Area from private properties that adjoin the Area boundary, but would have to travel to an official trailhead. The plan should be changed to allow riders to enter the National Area from trails on private property.*

Response: This portion of the plan remains unchanged from the Supplemental Draft GMP. NPS does not encourage or otherwise sanction the development of unofficial, social trails at any unit of the National Park System. Throughout the system, NPS requires all visitors to use official trailheads. To do otherwise would lead to a proliferation of feeder trails, with potentially significant impacts to soils, vegetation, and wildlife habitat, and possible impairment of these resources.

Comment: *The plan should not close any "courtesy" trails currently open to horses, such as the trail to "Eye of the Needle." All unofficial trails that currently receive horse use should be made part of the official system and kept open. If maintenance is a concern, volunteers would gladly clear these trails and maintain them.*

Response: The official trail system in the final GMP includes only those horse trails that are appropriate to the terrain (either before or after rehabilitation) and that can be adequately maintained given the staffing levels envisioned in the plan. Many of the "courtesy" trails in the National Area are social trails that were created without authorization and do not meet accepted design standards. Retaining all of these trails, as well as all other trails that currently receive horse use, would result in unacceptable environmental impacts and produce a trail system too large for NPS to maintain – with or without volunteers. NPS will actively recruit volunteers to help with maintenance of horse and other trails in the official system. However, even with volunteers, full implementation of the official trail system will only be possible with additional maintenance staff.

Comment: *The trail plan depicts eight public access points along trail alignments that connect to private lands. Two of these access points (Salt Pine Trailhead, Yellow Cliff Trailhead – Map 5) are to be provided by "other than NPS." Why is there a different policy for these two access points than for the similar access points on Map 10 where it appears that NPS will provide the access? The GMP should address several questions: Will the trailheads be inside the National Area boundary or on private land? Will the trailheads need to be deeded to a public entity? What are the NPS design and maintenance requirements for these public access trailheads? What will the landowner be expected to give up or provide? Who will maintain these trailheads? Who will be liable for accidents or injuries at these access points?*

Response: As noted in the plan, there may be instances in which it would be appropriate for landowners to cooperate in providing each other trail access across their lands to a point along the boundary where a public trailhead could be provided. With respect to ownership of trailheads, the plan no longer states that certain access points would definitely be provided by “other than NPS.” The intent of the final plan is only to indicate the location along the boundary where future access points might be constructed. Decisions about specific locations, e.g., whether the access point should be on federal land or private property, will be left for the site-planning stage. It is important to note that any trailhead that provides access to the official trail system, whether on public or private property, must be open to use by the general public. The other issues raised in the comment are not within the purview of the GMP and will likewise be addressed during site planning.

Comment: *With respect to the National Area trails served by the access points in in the previous comment, will these trails be brought up to standard (e.g., rerouted on steep grades) before or after the coordination of the access trailheads? The upgrading of these trails should occur first in order to prevent further deterioration.*

Response: NPS intends to bring the subject trails up to standard before new access trailheads are constructed. Constructing new access points first could result in accelerated adverse impacts.

Comment: *Organized riding events cannot get a permit to cross the Big South Fork because of concerns that such events will cause an unlawful “taking” of endangered species under Section 9 of the Endangered Species Act. However, the Fish and Wildlife Service in its January 1997 Rulemaking in the Federal Register states that “[FWS] also believes that certain other activities will not result in a section 9 violation. They include use of the river by boaters, anglers, and other existing recreational uses.” Horses were crossing the Big South Fork in 1997. Will organized rides be able to cross Big South Fork at Station Camp and No Business? Will equestrian event groups continue to be denied special use permits unless the activity avoids crossing the river?*

Response: The FWS’ January 1997 Rulemaking identified various recreational activities such as boating and fishing that clearly pose no threat of a section 9 violation. Horse crossings do not fall within this category. In fact, FWS has specifically asked the National Park Service to mitigate the conflict between horses and mussels in order to avoid a “taking” under the Endangered Species Act. Chapter 3 of the GMP states that special consideration will be given to the river to protect endangered species during competitive events. No equestrian competitive event has ever been denied a special use permit; rather, they have been encouraged to seek alternatives to crossing the river. Under the GMP preferred alternative, it is possible that a permit would be denied, under some scenarios, if no alternative to crossing the river could be found.

Comment: *The stream crossing issue (impacts on mussels and water quality) must be resolved before any new horse trails are permitted.*

Response: NPS will continue to work with the U.S. Fish and Wildlife Service to resolve the stream crossing issue as quickly as possible. No new horse crossings that could affect threatened or endangered mussels will be built until this issue is resolved, barring unforeseen, exceptional circumstances. The NPS is working with the U.S. Fish and Wildlife Service to restore and enhance mussel populations in the hope that mussels will become more abundant and ultimately not threatened. In addition, the National Area is working with other federal, state, and local cooperators to protect and enhance water quality, which should also lead to improved mussel populations.

Comment: *Horses must be allowed to cross streams and be ridden in low-lying areas. Otherwise, none of the trails in the National Area could be used for horses, because all trails and access points require horses to cross a creek, stream, or river.*

Response: It is true that the topography of the National Area is such that stream crossings are a necessity for horseback riders. The intent of the plan is to minimize stream crossings and the siting of trails in low-lying areas in order to avoid adverse environmental impacts.

Comment: *With respect to the Annual Trail Management Scope of Work (p. 291), normal-size bulldozers and dump trucks should have no place in the park except to work on roads. In the past, some horse trails were constructed as roads in order to accommodate these vehicles. In addition, switchbacks were not used often enough, primarily because bulldozers and dump trucks could not maneuver around them. No trail should be wide enough to accommodate normal-size bulldozers and dump trucks. Only small size vehicles should be used on the plateau surface.*

Response: Various tools and equipment are listed in the Annual Trail Management Scope of Work, including bulldozers and dump trucks. Depending upon the classification of the trail, these pieces of equipment may be the most appropriate to perform the necessary maintenance in the most efficient manner. In maintaining the trail system, the National Area will place a premium on minimizing impacts while managing an efficient operation.

Comment: *To discourage use of larger vehicles, maximum tread width should be kept to six feet, not the maximum of eight feet cited for horse trails on p. 44.*

Response: The plan has been revised to indicate that the cited trail widths are maximum widths. In most cases, the actual trail width will be narrower than the cited maximum based on amount of use. The maximum widths noted in the Road and Trail Classifications and Standards allow the National Area to construct and maintain a trail up to this width should the volume of use, type of use and long-term maintenance considerations warrant the maximum.

Comment: The size and appearance standards for horse trails are not conducive to a backcountry experience. All six horse trail classes approximate small roads of the same size. Nothing bigger than a trail dozer (4 foot blade) and an ATV dump with a bed should be used for trail construction and maintenance.

Response: The Road and Trail Classifications and Standards have been revised to indicate that the widths are maximum widths and will allow the National Area to size the trails according to the volume of use, type of use and long-term maintenance considerations. Tools and equipment used to construct and maintain the trails will be those that are deemed the most appropriate to perform the necessary maintenance in the most efficient manner.

Comment: Where horse trails are in the vicinity of rock shelters, hitching rails should be placed at a considerable distance from the entrance. Hitching rails should also be at a considerable distance from arches, chimneys, and cliff edges.

Response: The suggestions in the comment will be considered during future implementation planning.

## Multiple-use trails

Comment: The term "multiple-use trail" is deceptive, as is the "horse and hiking" designation. A multiple-use trail used by vehicles (and many of them are used by vehicles) is actually a road. A "horse and hiking" trail used by horses is a horse trail. These facilities do not provide a good hiking experience. Horses should be excluded wherever possible from hiking trails due to the potential for user conflicts and safety concerns for hikers and riders.

Response: Multiple-use trails are backcountry pathways intended for four-wheel drive vehicles, horses, bicycles, and hikers. In general, they are very rough and rustic and do not exhibit the characteristics of a park road. Admittedly, these trails will not provide an intimate hiking experience, so hikers seeking more solitude should travel one of the dedicated hiking trails.

There is no designation for "horse and hiking" trail. Rather, "hiking" trails are for hiking only; "horse" trails are for horses, with hiking and mountain biking allowed (in most cases).

Comment: Use of OHVs and other motorized vehicles should be barred from multiple-use trails.

Response: The concept of the multiple-use trail is that of a backcountry pathway appropriate for four-wheel drive vehicles, horses, bicycles, and hikers, where the terrain and tread surface allows only very slow motorized travel.

Comment: A number of roads exist in the National Area. More should be designated multiple-use and be opened to four-wheel drive vehicles.

Response: Four-wheel drive vehicles are allowed on all park roads and multiple-use trails. The NPS believes the GMP provides ample four-wheel drive opportunities in keeping with the recreation area concept, while still being protective of park resources.

## Seasonal Access Routes

**P54.** Comment: The preferred alternative creates a safety issue because it puts hunters and other users on the same trail (i.e., seasonal access routes) for two months out of the year. Since these routes are closed for most of the year, multiple user groups are likely to converge on these routes during the hunting season, thereby creating potential conflicts and unsafe conditions.

Response: The plan has been revised to eliminate the seasonal access route concept due to public opposition and anticipated difficulties in managing the routes. Some of the seasonal access routes have been eliminated; others have been combined with multiple use trails on which one may hike, bike, ride a horse, use a four-wheel drive vehicle, and, during big-game season while actively hunting, ride an ATV.

**P55.** Comment: The draft text states that closure of the seasonal access routes except in hunting season "should be beneficial to hunters since routes would not be traveled the rest of the year." This statement is not scientific and the proposal has no proven benefit. The GMP should be revised to allow year round use of these trails by 4 wheel drive vehicles, ATVs, hikers, horses, mountain bikers, and hunters.

Response: See the response to comment P78. The plan has been revised to eliminate the seasonal access route concept.

**P56.** Comment: Permits should be required for motorized use of the seasonal access routes.

Response: Comment noted. At this time, the National Area is not proposing a permit system for any type of trail use, but nothing in this GMP precludes a permit system in the future if conditions warrant.

## Off-highway vehicle (OHV) Use

**P57.** *Comment: Allowing OHV use on trails is inconsistent with legal mandates in the legislation that created the National Park Service. No experimental ATV trails should be constructed unless NPS has first made a finding of "no adverse effect" from this activity.*

Response: 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 NRR 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 NRR.

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.

**P58.** *Comment: No ATV planning areas should be put in place at Darrow Ridge because National Area resources will be damaged and National Area staffing is inadequate to enforce use restrictions.*

Response: Please see response to comment P81. Under the Final GMP, ATVs will be allowed for a trial period on designated routes in the ATV planning area. At the end of the trial period, NPS will evaluate impacts from ATV use, if any. Thereafter, ATV use will only be allowed on designated trails in the planning areas if it has been demonstrated that such use will not cause adverse impacts to the National Area's natural and cultural resources.

**P59.** *Comment: The plan should eliminate ATVs from all parts of the National Area, including the proposed seasonal access routes. ATVs are a source of noise and air pollution, damage soil and vegetation, and adversely affect many visitors' use and enjoyment of the National Area.*

Response: In recent years, there has been a growing demand for ATV trails by segments of the recreating public. Because Congress has directed NPS to manage the National Area in accordance with the national recreation area concept, NPS feels that it is appropriate to allow such use to the extent that this use is consistent with applicable regulations, executive orders, and bureau policies. The purpose of the ATV planning areas is to determine whether such usage can and should be allowed at the National Area given applicable legal requirements.

**P60.** *Comment: The GMP should state explicitly that no additional all-terrain vehicle (ATV) planning areas will be identified administratively (i.e., without public review and comment) in the future. Within the proposed ATV planning areas, ATVs should be strictly limited to defined trails (not "routes"). Removal, and not merely expansion, of trails should be considered following evaluation of the ATV planning areas.*

Response: The final plan has been revised and clarified per the comment.

**P61.** *Comment: The plan should state explicitly that no additional ATV planning areas will be designated other than the two on Darrow Ridge. Within the ATV planning areas, vehicles should be strictly confined to designated trails.*

Response: Please see response to comment P84.

**P62.** *Comment: The plan must provide more opportunities for ATVs in order to comply with the requirement of the enabling legislation that NPS develop the natural recreational potential of the National Area.*



Response: Please see the responses to comments P81 and P82. It is NPS policy for all units of the National Park System that the use of off-road vehicles is prohibited unless specifically authorized by a special regulation. Such special regulations may only be issued in cases where it can be shown that the proposed use will have “no adverse effect.”

**P63.** *Comment: More of the National Area should be opened to ATVs. The proposed ATV planning areas at Darrow Ridge are too small to be attractive to out-of-town riders, especially if, as proposed, access to the O&W railbed is denied. With their small size, the ATV planning areas will quickly become damaged from overuse, and significant enforcement efforts will be required to keep ATVs off of the O&W. A serious proposal would entail several 50 and 75 mile loops in scenic areas, with campsites.*

Response: As noted in response to comment P81, NPS is restricted by regulation and executive order from allowing ATV use except where it can be shown that such use will not result in adverse impacts to National Area resources. In the absence of specific data on impacts to local resources, NPS is not in a position to propose or evaluate loops on the scale described in the comment. If the trail in the initial ATV planning area shows that the likely level of use would be so intense as to result in adverse impacts, then NPS would use trail and/or visitor management techniques to eliminate the adverse impacts, up to and potentially including eliminating ATV use from the National Area (except on the multiple-use trails during big-game hunting season).

**P64.** *Comment: Allowing more OHV use would encourage tourism and boost the local economy.*

Response: Please see response to comments P80 and P83. As noted, the National Area will conduct a trial in the ATV Planning Area to determine whether this activity has adverse impacts on National Area resources. If no adverse impacts are identified, this activity may be expanded to other routes within the ATV planning area, after opportunities for public notice and comment.

**P65.** *Comment: There is no evidence to support the claim that that ATVs with their low pressure tires and low weight produce any more erosion or damage, when ridden properly, than much heavier horses.*

Response: As noted previously, NPS is restricted by regulation and executive order from allowing ATV use except where it can be shown that such use will not result in adverse impacts to National Area resources. These restrictions apply to NPS regardless of the relative impacts of ATVs and horses. In any event, it is NPS' experience at the National Area that ATVs frequently produce significant resource damage when ridden improperly or in inappropriate areas, as they often have been in the past.

## O&W Railbed

**P66.** *Comment: The plan should prohibit motorized vehicles on the old railbed east of the O&W Bridge. Scott County may have not acquired all of the deeds necessary to perfect an implied dedicated easement along the railbed. However, even if it has, NPS has the authority to make a management decision about the use of the railbed inside the National Area.*

Response: The Oneida and Western (O&W) railbed runs from the Verdun area of Oneida west and exits the National Area in Fentress County. The entire railbed is within the legislative gorge and lies beside portions of—from east to west—Pine Creek, Big South Fork, and North White Oak Creek. The portion from the eastern boundary of the National Area (Verdun area) to North White Oak Creek is within Scott County. Our legal research suggests that the county has acquired and maintained a deeded interest in this portion of the former right-of-way. This interest is coupled with an implied dedicated easement in favor of the public to travel on the right-of-way. Beyond North White Oak Creek, the railbed in Fentress County is considered legally abandoned.

Scott County has expressed a strong desire to keep motorized access available along those portions of the railbed covered by the easement. Therefore, because NPS wishes to work in partnership with Scott County to provide recreational access to the O&W Bridge area, the GMP proposes that the O&W route provide continued passenger vehicle access to the O&W Bridge from the east. Under the GMP preferred alternative, there would be a parking, vehicle turn-around, and picnic area just east of the bridge, the details of which will be coordinated with Scott County. The O&W route west of the bridge to trail connections near the western boundary of the National Area will be a trail designated for foot, horse, and bicycle use.

**P67.** *Comment: The plan should allow motorized vehicles on the old railbed west of the O&W Bridge. Some of the best and most popular camping spots in the National Area are located west of the bridge. Closing the railbed to vehicular traffic, as proposed, would end traditional uses of the area by long-time residents and deny access to older visitors or persons with disabilities.*

Response: The National Area's enabling legislation states that the Corps of Engineers "...shall study the desirability and feasibility of reestablishing rail transportation on the abandoned O&W railbed or an alternative mode of transportation within the National Area upon the O&W railbed...". The route was studied, as directed by Congress, for reestablishment of rail transportation or some alternative mode. Findings of studies by the Corps of Engineers and by NPS indicate recreational trail use is most appropriate. In keeping with these studies, NPS believes that the railbed west of the O&W Bridge is not appropriate for motorized recreation. Accordingly, this section of the O&W railbed will be only open to horses, hikers, and bicycle riders under the final plan.

**P68.** *Comment: The railbed west of the O&W Bridge should be closed to motorized vehicles. Ruts and erosion caused by off-highway vehicles impede use and enjoyment by bicyclists and other visitors.*

Response: Please see response to comment P91. The railbed west of the O&W Bridge over the Big South Fork River would be a trail designated for foot, horse, and bicycle use. This use would be consistent with the results of Corps of Engineers and NPS studies. The route would be brought to a standard suitable for the intended trail uses.

**P69.** *Comment: NPS should reconsider its plan to construct a parking area just east of the O&W Bridge. There is not room here for more than 2-3 cars without creating unacceptable resource damage. It might be better to place such an area back in the Pine Creek Gorge.*

Response: No parking facilities will be constructed at the O&W Bridge without first consulting with Scott County and doing detailed site assessment work, including an assessment of environmental impacts. The area available for parking at the O&W Bridge is limited, but provides the only space existing along the proposed motorized portion of the O&W railbed that is suitable for a day-use area. The topography in the Pine Creek vicinity is steep and does not allow for the development of such an area.

**P70.** *Comment: The trail west of the O&W Bridge (Segments B and C) should be limited to use as a biking and hiking trail, as recommended in the Corps of Engineers study. It should not be open to horses.*

Response: As noted in the comment, studies conducted by the Corps of Engineers recommended that the O&W railbed be used as a trail for bicycles and hikers. Subsequent studies conducted by the NPS recommended the addition of recreational horse use. Portions of the railbed west of North White Oak creek provide critical links in proposed equestrian loop trails, and horseback riders value the experience of riding to the O&W bridge. NPS believes that the railbed can accommodate each of these permitted uses while maintaining a high-quality, rail-to-trail type experience for the visitor.

## **Land Ownership**

**P71.** *Comment: The Preferred Alternative should emphasize the need to acquire the remaining private mineral tracts (approximately 20,000 acres) within the National Area boundary. The plan should include a more detailed discussion of intended management of those areas subject to potential development of mineral resources.*

Response: The acquisition of interests in land is generally not within the scope of a general management plan. The acquisition of such interests, as well as the priorities for acquiring individual interests, is covered by a unit's Land Protection Plan. The National Area currently operates under an approved land protection plan that was prepared in 1992 and last updated in 1998. Under this plan, the acquisition of outstanding mineral rights in the National Area is a low priority because regulations that govern the extraction of oil and gas should adequately protect surface resources.

As a general rule, NPS does not devote limited land acquisition funds to the acquisition of mineral estates, unless directed to do so by a unit's enabling legislation, or where imminent resource threats exist. The legislation establishing the National Area does not require the acquisition of mineral rights throughout the entire National Area, but only in the gorge. In the "adjacent area," i.e., the plateau, sellers may retain mineral rights if they so choose, and a number have done so. NPS is obligated by the enabling legislation to allow mineral exploration and extraction on these reserved estates, subject to such regulations as will minimize detrimental environmental impacts.

The management of lands subject to outstanding mineral estates is covered by separate planning documents. In the case of the National Area, an Oil and Gas Management Plan will be prepared after approval of the final GMP.

## **AFFECTED ENVIRONMENT**

### **Natural Resources**

#### **Endangered Species and Other Listed Species of Concern**

**P72.** *Comment: We strongly disagree with any finding that impairment of mussel resources is not occurring. The current procedure of flagging specified crossings should not continue beyond the finalization of the GMP.*

Response: The National Park Service will continue to work closely with the United States Fish and Wildlife Service (FWS) to achieve an approach to river and stream crossings that protects mussels and their habitat. For now, the flagging of specified crossings will continue, as approved by FWS. The route that is marked by the flagging has and will continue to be inspected by park staff and other federal and state biologists to insure that endangered mussels are removed from the riverbed in that location. Fortunately, the existing crossing is on bedrock and very little habitat exists for mussels. As long as recreational users stay within the designated corridor, the direct crushing impacts are mitigated. Education and enforcement of users is still necessary to insure compliance with the flagged

corridor. The flagging of specified crossings will continue only until alternative protective measures, approved by FWS, can be implemented by the National Park Service. As stated in the Final GMP (see Appendix *Horses and Mussels Policy Statement*), water pollution, not recreational use of the river, is the cause of mussel population decline and endangerment.

## Exotic species

**P73.** *Comment: The list of necessary plans for the National Area should be revised to include an exotic species control/eradication plan.*

Response: The plan has been revised to include an exotic species management plan.

## Other Activities

**P74.** *Comment: The National Area should develop a Climbing Management Plan. National Area management should allow the bolting of some climbing routes.*

Response: The specifics of climbing management are not typically dealt with by NPS in general management plans, but are addressed in a separate Climbing Management Plan. To assure consistency between plans, NPS will initiate a Climbing Management Plan at Big South Fork after approval of the final GMP. The Climbing Management Plan will address whether or not to allow the bolting of certain routes at the National Area.

## OTHER TOPICS

### Projected Costs

**P75.** *Comment: The National Area has very high administrative costs per visitor, yet does not offer visitors well-maintained facilities or a high-quality experience. The Supplemental Draft GMP would double the existing budget of the National Area while yielding only a small increase in visitation. The GMP should detail how NPS intends to streamline operations at the National Area to bring costs per visitor in line with other NPS units.*

Response: The budget of the National Area is smaller, on a per-acre basis, than many comparably sized parks in the national park system. In fiscal year 2004, the base budget for the National Area was approximately \$29 per acre. Comparatively, the 2004 base budget for Mammoth Cave National Park was \$106 per acre, the base budget for New River Gorge National River was \$94 per acre, and for Delaware Water Gap National Recreation Area it was \$116 per acre. One purpose of the GMP is to create, for the first time, an approved management plan in support of which the National Park Service can reasonably request increased operational funding, thereby improving the visitor experience.

The cost per visitor at NPS sites is often a function of the park's proximity to cities and densely populated areas. Thus, parks in urban areas and parks that have, over time, become traditional tourist destinations tend to have higher visitation and, hence, lower cost per visitor numbers. Parks in more remote, rural areas, like Big South Fork, often have lower visitation and higher costs per visitor. It is hoped that the increased opportunities contained in the GMP will result in increased visitation for the National Area. Regardless of the impacts on visitation, NPS will continue to seek adequate funding to protect visitors and area resources, and provide a quality visitor experience.

### Wilderness

**P76.** *Comment: The National Area needs to complete a Wilderness Suitability Assessment.*

Response: Completion of a Wilderness Suitability Assessment at the National Area is required by NPS policy. Section 6.2.1 of NPS' *Management Policies 2001* indicates that this wilderness suitability assessment was to have been completed by December 31, 2001. Due to resource limitations and other commitments, a wilderness suitability assessment has not been completed for the National Area.

The *Supplemental Draft GMP* includes a section entitled "Pre-assessment Wilderness Consideration" (p. 303-04), which is designed to guide management in its future assessment of wilderness suitability. This "Pre-assessment" has been carried forward to the *Final General Management Plan* in slightly revised form. It should be noted that the "no vehicle areas" on the map that accompanied the original pre-assessment were based on *public* vehicular use of National Area roads and trails. Private vehicle usage (as on oil and gas roads) does and will take place in many of these "no vehicle areas." Thus, the "no vehicle areas" on the original map (see page 304 of the *Supplemental Draft*) were not intended to depict roadless areas. The actual amount of roadless area within the National Area is considerably smaller than is suggested by the original map. The *Final General Management Plan* includes a revised map that takes both public and private vehicular use into account when depicting "no vehicle areas." Nevertheless, the "no vehicle areas" in the revised map are not necessarily roadless, and additional study of these areas is necessary.

NPS will initiate a wilderness suitability analysis for the National Area by October 1, 2006. The GMP will then be amended if necessary to reflect the outcome of the wilderness suitability assessment, as well as the subsequent wilderness study (if any). In the meantime, the preferred alternative does not envision any construction activity or any other alteration of the landscape that would prevent an area that otherwise qualifies as wilderness from being so designated in the future. The only potential conflict with wilderness comes from the siting of certain bike trails. Should it later be determined that an area that otherwise qualifies as wilderness contains a bicycle trail, that trail can be rerouted and an alternative bicycling opportunity provided. It is not the intention of the GMP to foreclose or limit any future wilderness designation via the Preferred Alternative.

## Table 6.1

### List of Commenters on the 2003 Supplemental Draft General Management Plan and Environmental Impact Statement

***Received by May 15, 2003 deadline***

The following groups submitted written comments on the *Supplemental Draft GMP*. Responses to comments can be found at the numbers set forth in column two below.

#### Groups

<b>Name</b>	<b>Comment Number(s):</b>
Beacon Hill Neighborhood Association	P47, P48
Big South Fork Bicycle Club	P50, P51, P52
Big South Fork Ride and Tie	P11, P21, P34, P35, P46, P58, P95
Blue Ridge Trail Riders, Inc.	P8, P17, P21, P35, P37, P39, P45, P66
Cave Run Mountain Bike Association	P50, P51
Cumberland Trail Conference	P30, P32, P54, P76
Fentress County Chamber of Commerce	P2, P12
Foundation for Global Sustainability	P29, P57, P59, P63, P69, P74, P76, P80, P81, P84, P92, P93, P98
Historic Rugby	P47, P48, P49
International Mountain Bicycling Association	P50, P51, P53, P54
Kentucky Horse Council	P70, P100
Kentucky Mountain Bike Association	P50, P51, P52
Looney Creek Toolers	P50, P51
Mountain ATV Riders, Inc.	P11, P86, P87, P88, P89
National Parks Conservation Association	P28, P30, P31, P32, P81, P84, P90, P92, P96
Sierra Club, Cumberland (KY) Chapter	P75, P54, P55, P59, P60, P76, P82
Sierra Club, Tennessee Chapter	P23, P55, P54, P59, P62, P75, P76, P84
Smoky Mountains Hiking Club	P23, P29, P30, P63, P82, P83, P92,
Tennessee Citizens for Wilderness Planning	P29, P57, P59, P63, P69, P74, P76, P80, P81, P84, P92, P93, P98
Tennessee Clean Water Network	P30, P59, P63, P78, P81, P84, P95, P96
Tennessee Horse Council	P3, P4, P5, P19, P20, P34, P40, P42, P58, P61, P66, P67, P68, P78, P79
The Wilderness Society	P100
Tourism Board of Scott County Tennessee	P1, P46, P50, P58, P78, P86, P90, P91

#### Individuals

The following individuals submitted written comments on the *Supplemental Draft GMP*. Responses to comments can be found at the numbers set forth in column three below

<b>Name</b>	<b>Address</b>	<b>Comment Number(s)</b>
Ach, Daniel	(no address)	P50
Beach, Cliff	Knoxville, TN	P50, P51
Bertram, Sheldon	(no address)	P27, P46, P86
Blankenship, Greg	(no address)	P50
Bodalament, Mary Lee	Jamestown, TN	P18, P64, P65
Brinkerhoff, Ron and Linda	Chuluota, FL	P18, P64, P65
Broemel, David	(no address)	P50
Brown, Michael E.	Brentwood, TN	P83
Burchfield, Vanessa	(no address)	P91
Burke, Scott	(no address)	P58
Cooper, Harry	Oak Ridge, TN	P86
Cooper, Randall	Crossville, TN	P86, P87
Copely, David	Elizabeth City, NC	P50
Coy, Doty	Richmond, KY	P59, P63, P76, P84, P92
Davis, Bob and Jayme	_____, TN	P65
Disbennet, Paul	Murfreesboro, TN	P50
Disser, Steven	Old Hickory, TN	P50
Dorrity, Chris	Arden, NC	P98
DuVall, Judith	Dandridge, TN	P59, P63, P76, P84
Emmott, Robert	Waynesville, NC	P14, P15, P22, P32, P35, P73, P95
Ethridge, Jack C.	Clinton, TN	P87
Evans, Boyd	Oak Ridge, TN	P50, P53, P90, P92
Evans, Kathy	Oak Ridge, TN	P34, P50, P51
Ezzell, Tom	Louisville, KY	P50
Foster, Grace	Norris, TN	P59, P84, P92
Gaines, Carol	Corydon, KY	P100
Gardner, Philip	Knoxville, TN	P87, P88
Gauger, Jean	Knoxville, TN	P23, P39
Gilbert, Steve	(no address)	P50
Goolsby, Virginia	Morristown, TN	P59, P63, P76, P84, P92
Gorenllou, Louise	Crossville, TN	P59, P63, P76, P84, P92
Graham, Robin L.	Knoxville, TN	P63, P76, P84
Grainger, Scott	Hendersonville, NC	P50
Hall, Adrienne	Caryville, TN	P24, P86
Harvey, Frank	(no address)	P98
Harwood, John	Cookeville, TN	P55, P62, P76, P83
Haynes, Valerie	Calhoun, KY	P100
Hefner, Mike	Alpharetta, GA	P50
Hensley, Dan	Lavergne, TN	P50
Hensley, Frank	Oak Ridge, TN	P59, P63, P76, P84
Hixon, Patsy	(no address)	P65
Isaacs, Karen R.	(no address)	P35
Johnson, Jim	Chattanooga, TN	P50
Keeton, Ricky	Helenwood, TN	P87, P88, P91
Kephart, Penny	Louisville, KY	P27, P38, P50, P60, P81, P83

Keys, Joe	Jamestown, TN	P87
Kickels, Wayne	Lenoir City, TN	P24, P59
King, Marilyn L.	Oneida, TN	P58
Kubarewicz, John	Oak Ridge, TN	P59, P63, P76, P84, P92
Lasatar, Les	Portland, TN	P50, P51, P52
Laun, David	Louisville, KY	P50
Laxton, Jeff	Oneida, TN	P58
Laxton-Lay, Tara Lace	(no address)	P91
Lessick, Thomas	Kingston, TN	P76
Longest, Albert W.	Ten Mile, TN	P91
Love, David	Columbus, OH	P50
Lynn, Larry	Augusta, GA	P50
McElhaney, Bill and Dolly	Vonore, TN	P70, P92
McKay, Amanda	Barbourville, KY	P50
Maldonado, Sonya	(no address)	P98
Manning, Russ	Norris, TN	P34, P35, P42, P43, P71, P72, P75, P76, P85, P90, P92
Marion, Jeff	Blacksburg, VA	P28, P32, P38
Mauldin, Gary	Knoxville, TN	P50, P51
Monge, Mary Lynn	Columbus, OH	P50, P51
Morgan, Mark	(no address)	P83
Murphy, Bill	Knoxville, TN	P50, P51
Neal, Luther, Jr.	Manchester, TN	P70
Neff, Brad	Jamestown, TN	P1, P3, P4, P6, P9, P12, P13, P26, P35, P38, P39, P40, P41, P44, P56, P61, P99
Neff, Susan	Jamestown, TN	P1, P4, P5, P7, P10, P19, P20, P22, P35, P37, P38, P40, P42, P46, P58, P61, P78, P79
Noffsinger, Jeff	Nashville, TN	P98
Patton, Wade	Murfreesboro, TN	P50
Payne, Ray	Knoxville, TN	P59, P63, P76, P84, P92
Petersen, Stephen	(no address)	P50
Peterson, Mark J.	Oak Ridge, TN	P59, P63, P76, P84
Phillips, Ben	Oneida TN	P50
Phillips, Benjamin	Lexington, KY	P50, P52
Phillips, Lynn	Helenwood, TN	P50, P52
Pickard, Joyce	Jamestown TN	P18, P65
Pickard, Tom	Jamestown, TN	P18, P65
Rabie, Diab	(no address)	P50
Reed, J.	Whitley City, KY	P33
Rich, Jenni	_____, MS	P38
Richardson, Jeanne	(no address)	P16, P22, P29, P35, P39, P59, P75, P97
Ringe, Axel C.	New Market, TN	P59, P76, P84
Ritter, Michael	Greeneville, TN	P50, P53
Rogers, Hiram	Knoxville, TN	P23, P39
Ruffin, Larry B.	Hiram, GA	P86, P87, P88
Russell Liane	Oak Ridge, TN	P59, P76, P84
Rust, Ken and Edi	Oak Ridge, TN	P50
Rust, Aubrey Rae	Oak Ridge, TN	P50
Rust, Dana	Oak Ridge, TN	P50
Rust, Mikah	Oak Ridge, TN	P50

Rust, Trey	Oak Ridge, TN	P50
Scanlon, Lucy P.	Norris, TN	P1, P11, P17, P21, P35, P37, P38, P40, P45, P50, P66, P78
Shuster, Art	_____, NC	P50, P51
Sillman, Roy	(no address)	P64, P65
Skelton, William H.	Knoxville, TN	P59, P63, P76, P84
Slack, Debbie	Deer Lodge, TN	P59, P76, P84
Slack, Len	(no address)	P59, P76, P84
Smith, Mike	Maryville, TN	P50
Smith, Roy and Margaret	Jamestown, TN	P18, P64, P65
Stedman, Stephen J.	Cookeville, TN	P59, P63, P76, P84
Tally, Burton	(no address)	P59, P63, P76, P84, P92
tnbandit (sic)	(no address)	P45
Townsend, Russ	Knoxville, TN	P86
Vancleave, G.	Knoxville, TN	P83
Walton, Barbara A.	Oak Ridge, TN	P59, P63, P76, P84
Weaver, Eddie	Knoxville, TN	P50, P76
Wedekind, James	(no address)	P23, P85, P90
White, Stephen	Clinton, TN	P50, P51
Whitehead, Karen R.	Maryville, TN	P1, P10, P17, P25, P35, P37, P50, P61, P66, P78, P86
Wilson, Drew S.	Spartanburg, SC	P50
Wilt, Marshall	Danville, KY	P60, P82
Winn, Keith	Midlothian, VA	P92
Wonyell, Bee and Jerry	Jamestown, TN	P18, P64, P65
Wood, Harold	Pine Knot, KY	P22
Yeomans, Bonnie	Jamestown, TN	P18, P64, P65

### Individuals Providing Comments to Court Reporter

The following individuals submitted comments on the *Supplemental Draft GMP* to the court reporter present at each public meeting. Responses to all comments recorded by the court reporter can be found at the numbers set forth in column two below.

#### Huntsville, TN

Name	Comment Number(s)
Harness, Edmond	P86
Purdy, Debbie	P86
Slaven, Letha	P86
Slaven, James, Jr.	P86
Slaven, Jimmy	P86

#### Wartburg, TN

Name	Comment Number(s)
Estes, Chuck	P31, P84, P90
Stroud, Roy	P24, P86

#### Whitley City, KY

<b>Name</b>	<b>Comment Number(s)</b>
Cottongim, Jr., Laddle	P87
Wilt, Marshall	P83, P84, P30

Allardt, TN

<b>Name</b>	<b>Comment Number(s)</b>
Cooper, Randall	P86
Hyder, Freddy	P86, P89, P91
McCann, Joseph	P86, P91
Reagan, Carolyn	P86
Rains, Ricky	P91
Reagan, Tom	P86, P91
Roysden, Guy J.	P86
Wagner, Reba	P86, P87



## Comments Submitted to Congressman Lincoln Davis

Four letters were received from the office of U.S. Congressman Lincoln Davis forwarding constituent concerns on the following subjects. Responses to these concerns can be found in the text of this chapter at the numbers set forth below:

- Provide additional background information on roads and trails. (P3, P7)
- Research providing additional trails for motorized vehicles. (P86, P87)
- Provide additional opportunities for mountain bicycles. (P50)
- Provide further opportunities for economic development in Fentress County. (G1, G4, G5, P1, P2, P12)

## List of Persons Signing Petitions (Legible Signatures)

Each of the following petitions was treated as a single comment:

### ***Keep the O&W Road Open***

(Please see response to comment P91)

Sheila Bales  
Rhonda Crabtree  
Buddy Daisy  
Heather Dolan  
Joey Duncan  
Patti Duncan  
Agnes L. Henry  
Susan Huff  
Shellia Kidd  
Angela T. King  
Barbara King  
J.J. King  
Kim King  
Michelle King  
Darby Laxton  
G.A. Laxton  
Jimmy Laxton  
Nada Payne Laxton  
Joe D. Lay  
John C. Lay  
Linda Lay  
Kristi Matthews

Michelle Norris  
Elaine Payne  
Eva Payne  
Tom Payne  
Tom Phillips  
Dale Posey  
Whitney Posey  
David Reagan  
Hope Reynolds  
Brandon Ryan  
Todd Ryan  
Rauson H. Smith  
Chris Stanley  
Crystal Stanley  
Jerica Stanley  
Ronald Thompson  
Ann West  
Barbara Wright  
Barry Wilson  
Carmine Wilson  
Donald Wright  
(11 more illegible signatures)

***Provide additional access and facilities in Fentress County***

(Please see responses to comments P2, P12, P18, P58, P66, and P67)

Mack and Lynn Alexander  
Rose Blosser  
Mr. and Mrs. Ally Boyce  
Mr. and Mrs. Ted Caldwell  
Mr. and Mrs. Brett Chancey  
Mr. and Mrs. Clifford Chancey, Sr.  
Mr. and Mrs. Clifford Chancey, Jr.  
Jay Chancey and family  
Mr. and Mrs. Ken Chancey  
Mr. and Mrs. Marc Chancey  
Mr. and Mrs. C.L. DeLoach  
Dub and Dianne Grant  
Rob and Bev Grant  
Roberta and Dub Grant  
Mr. and Mrs. Jim Hall  
June Lowe and family  
Charles Mooney  
Frank Mooney Jim Overton  
Dixie Peters  
Ray Peters

Lori Scarlett  
Mr. and Mrs. H. Sheppard  
Juanita Summerfield  
Martha Summerfield  
Julie and Flip Timmons  
Mr. and Mrs. Fred Washburn  
Allardt Land Co., Inc.  
East Fork Stables, Inc.  
Estate of Bruno Gernt Inc.  
First Volunteer Bank  
Highlands at Big South Fork  
Horseman's Market  
Horse Stuff Etc  
Ridgetop Acres  
Spruce Creek Acres  
T&S Grocery  
Timber Ridge Campground  
Union bank  
Wildwood Bed & Breakfast  
Willie Lee's Grocery  
Zenith Campgroud

## Postcards Received

NPS received approximately 200 postcards containing the text set forth below. These postcards were collectively treated as a single comment. (Please see responses at P59, P63, P76, P84, and P92 above.)

Dear Superintendent Detring:

The General Management Plan should truly protect the superb natural environment and the visitor experience in the Big South Fork (BISO).

- Alternative D is superior to all others, but needs modification.
- The GMP should state explicitly that no additional OHV Planing Areas will be identified in the future. Within the Planning Areas, OHVs should be strictly limited to defined trails.
- Motorized vehicles should be barred from multi-use trails.
- Significant portion(s) of BISO should have lower trail densities and fewer accesses than proposed in the Draft GMP.
- The proposed increase in horse trails is disproportionate to other trails.
- Horses should be kept out of all the Sensitive Resource Protection Zones, including wetlands and streams.
- No motorized vehicles should be permitted on the O&W right-of-way west of the O&W Bridge. This would make an ideal trail for bicycles.

Sincerely,

Name:

Address:

## **Form Letters Received**

NPS received approximately 92 form letters containing the text set forth below. These letters were collectively treated as a single comment. (Please see response at P100 above.)

Dear Superintendent Reed Detring:

Big South Fork NRRA is a unique park enjoyed by visitors from all over the country. Opportunities for solitude, escape, and recreation are among the many reasons that visitors flock there. Wildlife of all kinds is drawn to the area because of its remarkable natural resources.

Among those irreplaceable resources is wilderness. The Organic Act clearly directs the Park Service to conserve the scenery and natural and historic objects and the wildlife therein for future generations in such a manner as to leave them unimpaired. I urge you to address the wilderness issue fully within the General Management Plan as guided by the Organic Act, by NPS Management Policies 2001 and by the Director's Order #41.

These call for a complete and full wilderness assessment; no such assessment exists in the draft plan. Please do not sidestep the important question of wilderness. Offer the natural resources of Big South Fork, including wilderness, the protection they deserve.

Big South Fork belongs to all Americans, including those yet to come. The Big South Fork ecosystem deserves management that will ensure that it remains intact for future generations. Wilderness is an essential part of that management.

Thank you for the opportunity to comment.

Sincerely