



CHAPTER 5

Consultation and Coordination



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CHAPTER 5: CONSULTATION AND COORDINATION

In this chapter...

- Public Involvement
- Consultations and Agency Involvement

PUBLIC INVOLVEMENT

Scoping is an early and open process for determining the scope of a proposed action or project and for identifying issues related to the project. During scoping for this general management plan / environmental impact statement, NPS staff provided an overview of the project, including purpose and need and preliminary issues. The public has been involved and was asked to submit comments, concerns, and suggestions relating to the project and preliminary issues. The notice of intent to prepare an environmental impact statement was published in the *Federal Register* on December 17, 2004.

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

Internal scoping consisted of initial identification of issues by NPS staff based on what they had encountered with respect to managing park resources and experiences with visitors who enjoy the national historic site. An NPS staff scoping meeting was held on October 2, 2002, at national historic site headquarters to obtain initial input into the process.

The external scoping process provided early identification of concerns, issues, expectations, and values of existing and potential visitors, neighbors, cooperating associations, partners, scientists, scholars, and other government agencies. Public scoping meetings were advertised in August 2003. The public was invited to voice issues and suggest ideas for the future of the national historic site at three public scoping meetings held on August 19, 20, and 21, 2003, at the Dare County Public Library (August 19) and The Elizabethan Gardens conference room in Fort Raleigh National Historic Site (August 20 and 21). Press releases were issued prior to the public meetings, and comment cards and Internet addresses were provided for public use.

A scoping letter was mailed to local, state, American Indian Tribal Governments and federal agency representatives, members of Congress, and the public in February 2004 and July 2011. The scoping letter contained information on the purpose and need for the general management plan, summary of the planning process to date, and methods available to the public for communicating with the NPS planning team and participating in the planning effort, including public meeting locations and times.

Meetings were held with stakeholders March 9, 10, and 11, 2004, in the conference room of the Outer Banks Group Headquarters Building. These meetings were accompanied by public open house meetings, held March 10 and 11, 2004, at Roanoke Island Festival Park in Manteo, North Carolina. Stakeholders included representatives from neighborhood groups, visitors, and interested agencies and organizations. Information regarding the general management planning process was also provided at the visitor center. Park staff also provided information to visitors regarding how to comment. A newsletter describing the general management plan /

environmental impact statement process was prepared and distributed in the spring of 2004.

Two public scoping comment periods (conducted between August 2003 and February 2004) were open for over 30 days, and 10 meetings were held with the interested public and stakeholders to obtain public comment. Approximately 122 comments were received during scoping. The majority of comments pertained to facilities, partnering, interpretation/programming, resource management, and commercial services. Issues identified are summarized in chapter 1.

A second newsletter was prepared and distributed in May 2007 that described how the management alternatives were developed based on agency and public input, and announced public meetings to present the preliminary alternatives. These public meetings were conducted June 19 and 20, 2007. The alternatives were presented to the interested public during three meetings conducted at the Lindsay Warren Visitor Center Auditorium, located 3 miles north of Manteo, North Carolina on June 19 and 20, 2007. Press releases were issued prior to the public meetings; fliers and signs were posted to announce the meetings. Comment forms were provided, and the public was notified how to comment via the Internet. The comment period on the preliminary alternatives for the general management plan was extended to September 30, 2007.

The Next Steps

Following the distribution of the *Draft General Management Plan / Environmental Impact Statement*, there was a 60-day public review and comment period after which the NPS planning team evaluated comments from other federal agencies, organizations, businesses, and individuals regarding the draft plan. The changes were incorporated into the *Final General Management Plan / Environmental Impact Statement*. The final plan includes letters from governmental

agencies, any substantive comments on the draft document, and NPS responses to those comments. Following distribution of the *Final General Management Plan / Environmental Impact Statement* and a 30-day no-action period, a Record of Decision approving a final plan will be signed by the NPS southeast regional director. The record of decision documents the NPS selection of an alternative for implementation. Implementation of the plan can proceed upon final approval.

The general management plan / environmental impact statement, newsletters and other information is posted on the Internet at the NPS planning website: <http://parkplanning.nps.gov/fora>.

CONSULTATION WITH OTHER AGENCIES/OFFICIALS AND ORGANIZATIONS

In addition to the consultation described above, additional consultation with agencies was conducted prior to completing the general management plan / environmental impact statement. Agency coordination letters are included in Appendix D.

In accordance with 36 CFR 800 and the Programmatic Agreement between the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers, and the NPS, a letter was sent to the North Carolina State Historic Preservation Officer (February 2004) and to the Advisory Council on Historic Preservation (July 2011) to inform them a general management plan / environmental impact statement planning process was underway for Fort Raleigh National Historic Site and to initiate consultation with them. The letters invited them to participate in the planning process by reviewing and commenting on the general management plan / environmental impact statement. The North Carolina Department of Cultural Resources, State Historic Preservation Office acknowledged receipt of the NPS's

coordination letter and their intent to comment on the document upon availability.

While Section 106 summaries are included for each alternative in the impact analysis chapter (chapter 4) for archeological resources, ethnographic resources, cultural landscapes, and historic structures, the level of detail regarding the actions proposed in the alternatives is not sufficient to meet §106 requirements as outlined under 36 CFR 800. The Section 106 summaries are a preliminary determination of the effects the proposed actions will have on cultural resources. The national historic site will have to complete formal Section 106 consultation with the North Carolina State Historic Preservation Office and Advisory Council on Historic Preservation as needed, on the proposed actions in the general management plan / environmental impact statement before implementing them.

Federal regulations for the implementation of Section 106 of the National Historic Preservation Act of 1966, as amended, require consultation with federally recognized American Indian tribes (36 CFR 800.2) on a government-to-government basis, as specified in Executive Order 13175. Consultation letters were sent to the Eastern Band of Cherokee, Cherokee Nation, Tuscarora Nation, and United Keetoowah Band of Cherokee Indians. A sample consultation letter is included in Appendix D. Responses have not been received.

The North Carolina Department of Environment and Natural Resources, Division of Coastal Management responded to the NPS that they would not require a consistency review for this general management plan, and that a consistency review would be appropriate during implementation of the plan at the time that a specific project is proposed. The NPS would consult with the North Carolina Department of Environment and Natural Resources, Division of Coastal Management for consistency review of future proposed actions.

In accordance with 50 CFR 402(a), federal agencies are required to review all actions to determine whether an action may affect listed species or critical habitat. If such a determination is made, formal consultation is required, unless the federal agency determines, with the written concurrence of the U.S. Fish and Wildlife Service or the National Marine Fisheries Service, that the proposed action is not likely to adversely affect any listed species or critical habitat. It is NPS policy to survey for, protect, and strive to recover all native species that are listed under the Endangered Species Act.

In accordance with Section 7 of the Endangered Species Act (16 USC 1531 et seq.), the NPS contacted the U.S. Fish and Wildlife Service by letter to initiate consultation regarding threatened and endangered species. The North Carolina Wildlife Resources Commission, Division of Wildlife Management, Nongame & Endangered Wildlife was also contacted by letter. Consultation letters were also sent to the Environmental Protection Agency, Region 4, and other agencies. Letters of correspondence and responses are included in Appendix D and discussed in the sections that follow. A list of agencies contacted is provided in the section that follows.



A scoping session is held at the national historic site.

PUBLIC AND AGENCY INVOLVEMENT

The *Final General Management Plan / Environmental Impact Statement* for Fort Raleigh National Historic Site represents

thoughts of the NPS and the public. Consultation and coordination among the agencies and the public were vitally important throughout the planning process. The public had four primary avenues by which it participated during the development of the plan: participation in public meetings, responses to newsletters, comments submitted through the Planning, Environment, and Public Comment system (PEPC) (available on the internet at <http://parkplanning.nps.gov/fora>), and comments submitted through the mail.

COMMENTS ON, CHANGES TO, AND RESPONSES TO COMMENTS ON THE DRAFT PLAN

Availability of the Draft General Management Plan / Environmental Impact Statement

The *Draft General Management Plan / Environmental Impact Statement* was made available for public review for 60 days through June 4, 2013. A public meeting was held on April 30, 2013, at the National Wildlife Refuge Visitor Center on Roanoke Island, Manteo, North Carolina. Attendees included several individuals, members of the Roanoke Island Historical Association, and U.S. Fish and Wildlife Service employees.

Public comments were solicited during the public meeting and hard copy comment forms were provided for attendees. Newsletters were sent out in advance of the meeting to notify individuals of the date and time of the public meeting. Media and public service announcements were sent to local and regional newspapers and radio stations, and notices were posted at the Lindsay Warren Visitor Center in Manteo, North Carolina. Copies of the document were distributed by mail (both hard copies and CDs), as well as provided at park headquarters, posted on the Internet, and provided at the following Dare County, North Carolina libraries: Manteo, Kill Devil Hills, and Hatteras.

Comments on the *Draft General Management Plan / Environmental Impact Statement* were invited by all means and received in several different formats, including letters and postings on NPS Planning, Environment and Public Comment website. Comment sheets were handed out at the public meeting and from the visitor center. A total of five individuals entered comments on the NPS Planning, Environment and Public Comment website. All comments received are considered part of the administrative record.

Changes to the General Management Plan/ Environmental Impact Statement

Public feedback, discussion with user groups and other stakeholders, and agency consultation did not result in modification to the NPS preferred alternative identified in the *Draft General Management Plan / Environmental Impact Statement*. Minor changes were made to the Final plan to incorporate information in this chapter and the summary with regard to the public comment period.

Responses to Comments on the Draft Plan

Letters and web comments received from agencies and organizations are reprinted in full in the pages that follow this summary of comments and responses. Substantive comments are highlighted in the body of each letter, and a response to the substantive comment is provided on the page beside the copy of the letter. Agency letters were received from the North Carolina State Historic Preservation Office, the U.S. Fish and Wildlife Service, the U.S. Environmental Protection Agency, and the North Carolina Division of Coastal Management.

The North Carolina State Historic Preservation Office concurred with NPS findings that the preferred alternative would likely have no adverse effect on historic resources or structures. The U.S.

Fish and Wildlife Service concurred with NPS findings that the proposed action is not likely to adversely affect any federally listed endangered or threatened species, critical habitat, or species proposed for listing under the Endangered Species Act. The Environmental Protection Agency provided comments regarding utility usage rates and use of sustainable, “green” practices. The North Carolina Division of Coastal Management agreed that this general management plan would not require consistency review at this time and that consistency review would be appropriate at the time of a specific project proposal.

Other comments from The First Colony Foundation and the Roanoke Island Historical Association are reprinted in their entirety, and NPS responses to substantive comments are provided on the page beside the copy of the letter. Comments are considered substantive if they:

- Question, with reasonable basis, the accuracy of information in the Environmental Impact Statement
- Question, with reasonable basis, the adequacy of the environmental analysis

- Suggest different viable alternatives
- Cause changes or revisions in the proposal

Comments in favor of or against the preferred or other alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

Comments received via the NPS Planning, Environmental and Public Comment website were not considered substantive as they expressed a preference for the preferred alternative or relayed favored aspects of the national historic site. The First Colony Foundation expressed concerns that the designation of the national historic site as a North Carolina Significant Natural Heritage Area would hinder possible future archeological investigations. However, this designation would not preclude future archeological investigations.

The Roanoke Island Historical Association expressed a preference for Alternative B with elements of Alternative C. The NPS would continue to foster the long-standing partnership with the Roanoke Island Historical Association and work with them to increase the interpretive mission of both organizations.

Comment:

Response:

Comment Noted



North Carolina Department of Cultural Resources

State Historic Preservation Office

Governor Pat McCrory
Secretary Susan Klutz
Ramona M. Bartos, Administrator
Office of Archives and History
Deputy Secretary Kevin Cherry

April 26, 2013

Barclay Trimble

National Park Service Outer Banks Group
1401 National Park Drive
Manteo, NC 27954

Re: Fort Raleigh National Historic Site Draft General Management Plan and Environmental Assessment,
Dare County, ER 03-2021

Dear Superintendent Trimble:

Thank you for your letter of March 29, 2013, transmitting the Draft General Management Plan and Environmental Assessment for the Fort Raleigh National Historic Site.

We concur with the report's findings that each of the three proposed alternatives will likely have no adverse effect on above-ground historic resources or historic structures. We look forward to continuing to work with you and your staff in the future as the General Management Plan is implemented.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Henee Gledhill-Farley, environmental review coordinator, at 919-807-6579 or hfarley@ncdcr.gov. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca M. Bartos".
Rebecca M. Bartos

Comment:

United States Department of the Interior



FISH AND WILDLIFE SERVICE
Raleigh Field Office
Post Office Box 35726
Raleigh, North Carolina 27636-3726

April 24, 2013

David Libman
Fort Raleigh National Historic Site GMP
National Park Service, Southeast Regional Office
100 Alabama Street, 1924 BLDG
Atlanta, GA 30303

Re: GMP & EIS for Fort Raleigh National Historic Site-Dare County, NC

Dear Mr. Libman:

This letter is to inform you that a list of all federally-protected endangered and threatened species with known occurrences in North Carolina is now available on the U.S. Fish and Wildlife Service's (Service) web page at <http://www.fws.gov/raleigh>. Therefore, if you have projects that occur within the Raleigh Field Office's area of responsibility (see attached county list), you no longer need to contact the Raleigh Field Office for a list of federally-protected species.

Our web page contains a complete and frequently updated list of all endangered and threatened species protected by the provisions of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.)¹(Act), and a list of federal species of concern¹ that are known to occur in each county in North Carolina.

Section 7 of the Act requires that all federal agencies (or their designated non-federal representative), in consultation with the Service, insure that any action federally authorized, funded, or carried out by such agencies is not likely to jeopardize the continued existence of any federally-listed endangered or threatened species. A biological assessment or evaluation may be prepared to fulfill that requirement and in determining whether additional consultation with the Service is necessary. In addition to the federally-protected species list, information on the species' life histories and habitats and information on completing a biological assessment or evaluation and can be found on our web page at <http://www.fws.gov/raleigh>. Please check the web site often for updated information or changes.

¹ The term "federal species of concern" refers to those species which the Service believes might be in need of concentrated conservation actions. Federal species of concern receive no legal protection and their designation does not necessarily imply that the species will eventually be proposed for listing as a federally endangered or threatened species. However, we recommend that all practicable measures be taken to avoid or minimize adverse impacts to federal species of concern.

Comment:

If your project contains suitable habitat for any of the federally-listed species known to be present within the county where your project occurs, the proposed action has the potential to adversely affect those species. As such, we recommend that surveys be conducted to determine the species' presence or absence within the project area. The use of North Carolina Natural Heritage program data should not be substituted for actual field surveys.

If you determine that the proposed action may affect (i.e., likely to adversely affect or not likely to adversely affect) a federally-protected species, you should notify this office with your determination, the results of your surveys, survey methodologies, and an analysis of the effects of the action on listed species, including consideration of direct, indirect, and cumulative effects, before conducting any activities that might affect the species. If you determine that the proposed action will have no effect (i.e., no beneficial or adverse, direct or indirect effect) on federally listed species, then you are not required to contact our office for concurrence (unless an Environmental Impact Statement is prepared). However, you should maintain a complete record of the assessment, including steps leading to your determination of effect, the qualified personnel conducting the assessment, habitat conditions, site photographs, and any other related articles.

With regard to the above-referenced project, we offer the following remarks. Our comments are submitted pursuant to, and in accordance with, provisions of the Endangered Species Act.

Based on the information provided and other information available, it appears that the proposed action is not likely to adversely affect any federally-listed endangered or threatened species, their formally designated critical habitat, or species currently proposed for listing under the Act at these sites. We believe that the requirements of section 7(a)(2) of the Act have been satisfied for your project. Please remember that obligations under section 7 consultation must be reconsidered if: (1) new information reveals impacts of this identified action that may affect listed species or critical habitat in a manner not previously considered; (2) this action is subsequently modified in a manner that was not considered in this review; or, (3) a new species is listed or critical habitat determined that may be affected by the identified action.

1) However, the Service is concerned about the potential impacts the proposed action might have on aquatic species. Aquatic resources are highly susceptible to sedimentation. Therefore, we recommend that all practicable measures be taken to avoid adverse impacts to aquatic species, including implementing directional boring methods and stringent sediment and erosion control measures. An erosion and sedimentation control plan should be submitted to and approved by the North Carolina Division of Land Resources, Land Quality Section prior to construction. Erosion and sedimentation controls should be installed and maintained between the construction site and any nearby down gradient surface waters. In addition, we recommend maintaining natural, vegetated buffers on all streams and creeks adjacent to the project site.

The North Carolina Wildlife Resources Commission has developed a Guidance Memorandum (a copy can be found on our website at (<http://www.fws.gov/raleigh>)) to address and mitigate secondary and cumulative impacts to aquatic and terrestrial wildlife resources and water quality. We recommend that you consider this document in the development of your projects and in completing an initiation package for consultation (if necessary).

2

Response:

1) Response: Mitigation measures are discussed in chapter 2 including those that address land disturbance. All appropriate permits would be obtained prior to land disturbing activities to protect resources.

2) Response: Comment noted.

Comment:

Chapter 5: Consultation and Coordination

We hope you find our web page useful and informative and that following the process described above will reduce the time required, and eliminate the need, for general correspondence for species lists. If you have any questions or comments, please contact John Ellis of this office at (919) 856-4520 ext. 26.

Sincerely,



Pete Benjamin
Field Supervisor

*Fort Raleigh National Historic Site
Final General Management Plan / Environmental Impact Statement*

Comment:

List of Counties in the Service's Raleigh Field Office Area of Responsibility

| | |
|-------------|------------|
| Alamance | Perquimans |
| Beaufort | Person |
| Bertie | Pitt |
| Bladen | Randolph |
| Brunswick | Richmond |
| Camden | Robeson |
| Carteret | Rockingham |
| Caswell | Sampson |
| Chatham | Scotland |
| Chowan | Tyrell |
| Columbus | Vance |
| Craven | Wake |
| Cumberland | Warren |
| Currituck | Washington |
| Dare | Wayne |
| Duplin | Wilson |
| Durham | |
| Edgecombe | |
| Franklin | |
| Gates | |
| Granville | |
| Greene | |
| Guilford | |
| Halifax | |
| Harnett | |
| Hertford | |
| Hoke | |
| Hyde | |
| Johnston | |
| Jones | |
| Lee | |
| Lenoir | |
| Martin | |
| Montgomery | |
| Moore | |
| Nash | |
| New Hanover | |
| Northampton | |
| Onslow | |
| Orange | |
| Pamlico | |
| Pasquotank | |
| Pender | |

Comment:

Chapter 5: Consultation and Coordination



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-4960

June 4, 2013

Superintendent, Mike Murray
Fort Raleigh National Historic Site
General Management Plan
1401 National Park Drive
Manteo, NC 27954

RE: Draft General Management Plan/Environmental Impact Statement Fort
Raleigh National Historic Site
CEQ Number: 20130083

Dear Mr. Murray:

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the subject Draft General Management Plan/Environmental Impact Statement Fort Raleigh National Historic Site. The National Park Service (NPS) is the lead agency for this DEIS.

General management plans are long-term documents that establish and articulate a management philosophy and framework for decision making and problem solving in the parks. Fort Raleigh National Historic Site's last planning effort was completed in 1964, however this Master Plan was not prepared in conformance with the requirements of the National Parks and Recreation Act of 1978 and current management policies and guidelines. Since the 1964 Master Plan, the boundary of Fort Raleigh National Historic Site has expanded as well as the interpretive mission that includes peoples and individual's whose lives and lifestyles span more than 420 years. Guidance is needed to provide management direction and address issues associated with the national historic site's expanded boundary and themes. This general management plan provides management direction for the park for the next 15 to 20 years.

ALTERNATIVES

The NPS developed all alternatives with substantial public, interagency, and NPS staff participation. Three alternatives have been developed for managing visitor use and resources at Fort Raleigh National Historic Site. Each alternative provides a different management approach. The alternatives were based on the park's purpose and significance, legal mandates, public views, and information on visitor use and park resources. The alternatives are: Alternative A – the No-action Alternative, Alternative B, and Alternative C (NPS Preferred Alternative).

Comment:

ALTERNATIVE A: NO-ACTION / CONTINUE CURRENT MANAGEMENT

Alternative A is the continuation of current management actions and direction into the future; continuing with the present course of action until that action is changed. “No-action” does not mean the national historic site does nothing. Rather, Alternative A represents how the national historic site would continue to manage natural resources, cultural resources, and visitor use and experience if a new general management plan was not approved and implemented.

ALTERNATIVE B

Under Alternative B, the national historic site would:

- *Emphasize a greater reliance (than under current conditions) on partnerships, cooperative agreements, and on-site visitor facilities and services to accomplish interpretation of the Roanoke Voyages. NPS interpretive focus would be on the national historic site's other stories (Carolina Algonquians, Civil War, Freedmen's Colony, Fessenden experiments).
- *Provide orientation to the national historic site.
- *Evaluate the feasibility of an expanded campus (new Roanoke Island Historical Association [partner]-funded visitor center/indoor theater could be built near the current NPS visitor center) for partner-funded interpretation of the Roanoke Voyages and *The Lost Colony* outdoor symphonic drama.
- *The NPS would also address compliance requirements for ground disturbing projects such as trails work, vegetation plantings, expansion of parking at headquarters (eight spaces), outdoor seating area, signage and wayfinding, and removal of the Prince and Beehive houses.

Under Alternative B the national historic site would:

- *Rely more upon Roanoke Island Historical Association to tell the story of the Roanoke Voyages. The NPS would interpret other national historic site stories, including Carolina Algonquians, Freedmen's Colony, Civil War, and Fessenden radio experiments.
- *Provide self-guided interpretive opportunities using existing trails.
- *Explore the use of the NPS Arts-in-Parks program. This program is offered in various parks across the country and invites visitors to experience the wonder of the park in combination with the wonder of the arts.

Many of the features of Alternative B would be the same as those already described for Alternative A.

ALTERNATIVE C (NPS PREFERRED ALTERNATIVE)

Alternative C would emphasize Section 3 of Public Law 101-603 which states that the “Secretary, in consultation with scholarly and other historic organizations, shall undertake research on the history and archaeology of the national historic site, and the associated peoples and events.” The national historic site would accomplish this by, increasing emphasis on research related to interpretive themes and legislative mandates. By coordinating and expanding efforts with research organizations and agencies, visitors would benefit by gaining increased knowledge of the national historic site and its multiple themes, both cultural

Response:

Comment:

and natural.

Under Alternative C, the national historic site would:

- *Enhance its partnership with the First Colony Foundation, a North Carolina 501(c) (3) non-profit organization dedicated to conducting archaeological and historical research, combined with public education and interpretation. The First Colony Foundation is focused on research and education relating to the story of North Carolina and America's beginnings with the attempts by Sir Walter Raleigh to establish English colonies at Roanoke Island in the 1580s under his charter from Queen Elizabeth I (First Colony Foundation website 2011).
- *Establish partnerships with organizations that focus on natural and cultural resource topics.
- *Include archaeology as a significant aspect of the research program at the national historic site.
- *Maintain the current visitor center as the primary visitor orientation facility.
- *Implement NPS researcher-in-the-park program.

*Promote increased research use of collections at the Museum Resource Center.

*Increase research efforts with regard to the effects of climate change on natural and cultural resources in the national historic site.

Many of the features of Alternative C would be the same as those already described for Alternative A or Alternative B.

EPA's COMMENTS

EPA appreciates the opportunity to review this document and would like to provide the following comments.

Generally speaking, this document provides very good discussions of sea-level rise, shoreline erosion, invasive species and historic resources (history, present and future uses). With Alternative C analysis and conclusions, impacts to wetlands appear to be relatively minor. However, the proposed changes to the site with increased visitor use should be further explored in this long-term plan.

Specifically, the following issues should be addressed in the Final Environmental Impact Statement.

1) *The proposed changes to the site are expected to increase visitor use over time. How much increase is expected?

*The EIS lacks detail on the current drinking water and wastewater collection and treatment system, including the potential for accommodating additional visitor use.

*Page 134 identifies that there are water treatment plant structures. What is their capacity, type of treatment, etc? How will they handle the expected increase in use?

The actions proposed in the GMP are not expected to alter or impact utilities. By connecting to the county's water supply, the availability of the public drinking water is secured for the future. Based on the level of water use, visitors are not expected to exceed the capacity of the county, as visitors are already taken into consideration as part of the normal seasonal population this area experiences. With regards to refuse collection and disposal and waste recycling and reuse, the systems in place are adequate to handle visitation rates.

Comment:

Response:

*Page 147 identifies a county waterline along old US 64. What is the capacity, source, etc.? How will they handle the expected increase in use?

*The EIS lacks detail regarding refuse collection and disposal and waste recycling and reuse (current and future). With additional park use what are the long-term plans to contain, disposal and recycling waste and refuse?

2) *The DEIS lacks any identification of 'green' initiatives for existing and future facilities.

In the spirit of collaboration and technical assistance the EPA recommends some sustainability concepts which could be considered in the final management plan.

Green Building

Green building is the practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building's life-cycle from design to, construction, operation, maintenance, renovation and deconstruction. This practice expands and complements the classical building design concerns of economy, utility, durability, and comfort. Green building is also known as a sustainable or high performance building.

Green buildings are designed to reduce the overall impact of the built environment on human health and the natural environment by:

- Efficiently using energy, water, and other resources
- Protecting occupant health and improving employee productivity
- Reducing waste, pollution and environmental degradation

For example, green buildings may incorporate sustainable materials in their construction (e.g., reused, recycled-content, or made from renewable resources); create healthy indoor environments with minimal pollutants (e.g., reduced product emissions); and/or feature landscaping that reduces water usage (e.g., by using native plants that survive without extra watering).

In the United States, buildings account for:

- 39 percent of total energy use
- 12 percent of the total water consumption
- 68 percent of total electricity consumption
- 38 percent of the carbon dioxide emissions

Potential benefits of green building can include:

Environmental benefits

Enhance and protect biodiversity and ecosystems

2) Response: NPS is committed to environmental sustainability and protection. For example, the Lindsay Warren Visitor Center was retrofitted and green construction methods and materials were used. The NPS employs sustainable practices; for example the NPS provides water filling stations in place of selling bottled water. The Outer Banks group is currently utilizing the concept of green parking with new construction and will consider this in future plans. The general management plan does not detail site-specific measures, footprints, surfaces, or materials. As mentioned in the Needed Future Studies and Plans section of chapter 2 of this plan, this level of detail will be provided during implementation of specific actions once this general management plan is completed. These more detailed implementation plans would describe how the NPS would achieve desired conditions outlined in the general management plan. As required, detailed proposed actions with site specific sustainable measures would be provided and environmental compliance would be completed. The NPS appreciates the EPA suggestions for environmental sustainability and protection. Opportunities for public input would be provided during development of these implementation plans.

Comment:

Improve air and water quality
Reduce waste streams
Conserve and restore natural resources

Economic benefits

- Reduce operating costs
- Create, expand, and shape markets for green product and services
- Improve occupant productivity
- Optimize life-cycle economic performance

Social benefits

- Enhance occupant comfort and health
- Heighten aesthetic qualities
- Minimize strain on local infrastructure

Green Parking

Green parking refers to several techniques that when applied together reduce the contribution of parking lots to total impervious cover. From a storm water perspective, green parking techniques applied in the right combination can dramatically reduce impervious cover and, consequently, reduce the amount of storm water runoff. Green parking lot techniques include: setting minimums of permanent parking spaces; minimizing the dimensions of parking lot spaces; utilizing alternative pavers in overflow parking areas; using bioretention areas to treat storm water; encouraging shared parking.

Green parking lots can dramatically reduce the creation of new impervious cover. How much is reduced depends on the combination of techniques used to achieve the greenest parking. While the pollutant removal rates of bioretention areas have not been directly measured, their capability is considered comparable to a dry swale, which removes 91 percent of total suspended solids, 67 percent of total phosphorous, 92 percent of total nitrogen, and 80-90 percent of metals (Claytor and Schueler, 1996).

North Carolina's Fort Bragg vehicle maintenance facility parking lot is an excellent example of the benefits of rethinking parking lot design (NRDC, 1999). The redesign incorporated storm water management features, such as detention basins located within grassed islands, and an onsite drainage system that exploited existing sandy soils. The redesign reduced impervious cover by 40 percent, increased parking by 20 percent, and saved 20 percent or \$1.6 million on construction costs over the original, conventional design.

Briefly three other sustainable activities which may applicable to the Park Service's general management plan are as follows:

- Green Detention Ponds
- Rain Water Harvesting
- Rain Gardens

Comment:

CONCLUSION

EPA appreciates the effort and planning put into this Draft General Management Plan. This document provides very good discussions of sea-level rise, shoreline erosion, invasive species and historic resources (history, present and future uses). Based on the available information, we agree with NPS that Alternative C would appear to be the best approach. However, EPA rates this Plan EC 1 (Environmental Concerns Adequate) because EPA requests that clarifying language and information should be included in the final EIS.

We appreciate the opportunity to review the proposed action. Please contact Ken Clark at (404) 562-4282 if you have any questions or want to discuss our comments.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Environmental Accountability

Comment:

Response:

From: Rynas, Stephen <stephen.rynas@ncdenr.gov>
Date: Mon, Jul 29, 2013 at 10:58 AM
Subject: FW: Fort Raleigh National Historic Site - Draft General Management Plan/Environmental Impact Statement (DCM#20130034)
To: "david.libman@nps.gov" <david.libman@nps.gov>
Cc: "Swilling, William" <william.swilling@nps.gov>

David; In response to your phone call today, the Division of Coastal Management and the Cape Hatteras NS agreed that this management plan would not require consistency review at this time. Management Plans are on the borderline as to whether consistency review would or would not be required. It all depends on whether the management plan proposes an actual action that would have a "coastal effect". In this situation, we determined that consistency review would be appropriate at the time of a specific project proposal.

Though we are not requiring consistency review at this time, there were significant issues that I need to relay back to you for future consideration.

1. Conceptually, the NEPA process should be completed prior to the submission of a consistency determination. However, please note that there is NO actual requirement for that. The requirement is that the Park Service is to submit its "FINAL" proposed action, which normally be expected to follow completion of the NEPA process.
2. The submitted EIS did not meet the requirements of a consistency submission since it did not evaluate how the plan would be consistent with North Carolina's Coastal Management program.

Should you have any further questions, please contact me.

<http://dcn2.enr.state.nc.us/Permits/consist.htm>

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Atlanta, GA 30303
404-507-5701
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Fort Raleigh National Historic Site
Final General Management Plan / Environmental Impact Statement

Comment:



May 7, 2013

Barclay C. Trimble,
Superintendent, Cape Hatteras National Seashore,
1401 National Park Drive, Manteo, NC 27954

Dear Superintendent Trimble,

We were happy to learn that Fort Raleigh National Historic Site has come under your stewardship, and we look forward to working with you and perhaps meeting you at our June 1 Board Meeting at the Park headquarters.

Thank you for inviting the First Colony Foundation to comment on the proposed General Management Plan for the Fort Raleigh National Historic Site.

Plan C is our preference too. We believe the site will most benefit from an approach heavy on research, especially archaeological and historical research. We note that the report calls for annual archaeological excavations, which would be funded by NPS, at least at first, and later by partners. Plan C also designates archaeological surveys on either side of the Elizabethan Gardens.

It should be helpful to you and your staff to have a clear idea of how archaeological fieldwork would fit Plan C. After seven years of fieldwork (2006-12) at or near Fort Raleigh, First Colony Foundation's developed program for archaeological research is best described as falling into three broad categories, each of which has a different objective.

1. Discrete excavations at and around the reconstructed earthwork with the goal of providing clarifying information relating to the fort's plan, construction, and date, as well as its stratigraphic relationship to nearby Elizabethan structures and activity areas. Combined with the archaeological data accumulated since 1950, this high priority project will enable the repair and correction of the existing earthwork reconstruction as well as the interpretation of associated Elizabethan "science center" of Thomas Harriot and Joachim Gans.
2. Large scale multi-year excavations in the area of the Nature Trail. The important 2008 discovery there of two cache-pits containing the copper necklace and Venetian bead ornaments, as well as an area with a distribution of typical late sixteenth century artifacts, indicates that an Elizabethan site of undetermined nature lies under more recent dune activity. The project's goals are to recover new material for FORA Cultural Resources and to provide FORA opportunities to engage the public through direct archaeological observation and interpretation.
3. Intensive survey, both remote sensing and manual testing, of the bluff and adjacent property between the Elizabethan Gardens and the Dough Cemetery. Local residents have long found quantities of Algonkian artifacts on the beach west of the gardens, and the near presence of the Roanoke village of 1584 was suggested by 2012 FCF test excavations at the

Comment:

northwest corner of the gardens. The goal of this project is to determine the spatial extent of evidence of Algonkian activity, which would form the basis of a subsequent research proposal for more detailed investigation focusing on the nature of the activity and possible habitation.

These, then, are the three general archaeological activities that First Colony Foundation proposes for the Park, and their inclusion could benefit the final Management Plan. In addition, our discoveries and conclusions directly affect at two points in the Plan.

First, a significant challenge will be determining the priority of locating and preserving the historical site resources with an understanding of the modern landscape. On pages 115 - 117 there is discussion of the "Fort Raleigh Maritime Forest, North Carolina Significant Natural Heritage Area," which is said to be recommended for registry as regionally significant, particularly the area of Maritime Evergreen Forest located on the dune field near the reconstructed fort. Our research indicates that both this dune field and maritime forest were generated some 150-200 years after the attempted settlement of the Raleigh colonies. Thus, all cultural resources dating prior to circa 1760 lie beneath both the thick dunes and the mature forest. Limiting archaeological research to areas with relatively thin sand overburden (2'-3') and away from mature live oaks may result in a very unclear, if not completely incomprehensible, picture of the buried cultural resources and buried cultural landscape at Fort Raleigh.

Secondly, on page 128 there is a short paragraph on the Cultural Landscape of the period 1584-1590, and the conclusion that is considered to have little integrity from this period because there is a lack of known remains. We would caution that the Cultural Landscape may have considerable integrity and that "not readily observable" elements, which could be identified through archaeological research, likely survive under the thick sand overburden and maritime forest that blanket much of the site near Roanoke Sound.

Again, we look forward to continuing our partnership with Fort Raleigh Historic Site, and enlarging our joint efforts to bring to light its lost history.

With best wishes,



Phillip W. Evans, President

on behalf of the Executive Committee:

Robert Davis
Eric Klingelhoefer
Nicholas Luccketti
Alastair Macdonald

Response:

1) Response: The NPS appreciates the work of the First Colony Foundation and looks forward to continuing this relationship in the future. The preferred alternative and proposed management efforts are general in this phase of the planning, and further details regarding site specific surveying will be developed during the implementation of the plan.

2) Response: The designation as a North Carolina Significant Heritage Area does not preclude archeological surveys, which would be allowed with monitoring before and after the digs. Shovel testing and other activities would be performed to limit impacts on forest resources.

3) Response: Comment noted. The NPS acknowledges that the cultural landscape may have considerable integrity and takes precautions, recognizing there could be elements not readily visible.

Comment:



America's Premiere Outdoor Symphonic Drama

June 3, 2013

Barclay Trimble, Superintendent
Fort Raleigh National Historic Site
General Management Plan
1401 National Park Drive
Manteo, NC 27954

Re: Fort Raleigh National Historic Site, General Management Plan

Dear Mr. Trimble:

The Roanoke Island Historical Association [“RIHA”] appreciates the opportunity to comment on the Draft General Management Plan [“GMP”] that was presented in April 2013.

At this time we strongly support Alternative B along with elements of Alternative C. Alternative B offers an expanded partnership between the RIHA and the National Park Service. This partnership has been very beneficial to our citizens – local, state and national. We can and should build on this long-standing successful relationship.

A major element of the RIHA mission is to interpret via programs and exhibits the pre-colonial history of Roanoke Island and more specifically, the Roanoke Voyages. The RIHA Constitution and By Laws, Section 2 as written by the NC Legislature in 1937 state: “The purpose of this Association (RIHA) shall be: to celebrate and depict by exhibitions, pageants, reproductions, and by broadcasting and publishing historic narratives and records, the transporting of English-speaking civilization on Roanoke Island, Dare County, North Carolina by Sir Walter Raleigh and his colonists in the years 1584-1587, and the several efforts then made to establish the first English-speaking colony in the New World; and to establish and maintain one or more areas or sites for the permanent location of buildings and other structures with convenient facilities for preserving a historical background and representing the settlement and habits of life of the early colonists; to establish and maintain a museum of Indian and early Colonial antiquities; and to effect any other activities or plans to be designated to further the preservation of this chapter of North Carolina history.”

We support evaluating the feasibility of an expanded campus (new RIHA funded visitor center) that would feature a gift shop, interactive museum and theatre. We believe the center will enhance the visitors experience through interpretive displays of the Roanoke Voyages, and *The Lost Colony* drama. RIHA would once again operate the Gift Shop and assume responsibility for all exhibits for the public at the Visitor Center.

We also support extending the Roanoke Island multi-use trail into the national historic site (from Highway 64 to the Waterside Theatre and The Elizabethan Gardens.) We believe this will increase visitation to the site as well as enrich the guest experience.

* 1409 National Park Drive Manteo, NC 27954 • 252-473-2127 • www.thelostcolony.org

Response:

Fort Raleigh National Historic Site
Final General Management Plan / Environmental Impact Statement

Response: The NPS acknowledges and appreciates the comments and will continue to value and foster the long-standing partnership with Roanoke Island Historical Association (RIHA). Alternative C enhances partnerships and therefore the NPS would continue to work with RIHA to allow for increased presence in the interpretative mission of RIHA and the NPS.

Comment:

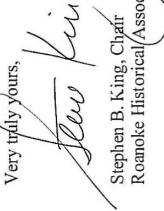


America's Premiere Outdoor Symphonic Drama

Alternative C offers several opportunities that we believe can be implemented along with Alternative B. RIHA supports additional archaeological investigation that advances the story and history of the Roanoke Voyages and the native population at that time. We support enhancing the visitors experience through interaction with archeologists, historians and researchers on-site. RIHA also supports improving trails throughout the park. Pursuit of Alternative B, along with these added opportunities will allow the NPS to interpret the full array of the Fort Raleigh National Historic Site while ensuring the central theme remains the Roanoke Voyages.

We appreciate the opportunity to offer input on the National Park Service GMP. Please let us know if there are questions that you may have about our reply. Thank you for taking the time to review our feedback and we look forward to continuing our partnership for the next 75 years.

Very truly yours,


Stephen B. King, Chair
Roanoke Historical Association

AGENCIES, ORGANIZATIONS, AND INDIVIDUALS RECEIVING A COPY OF THIS DOCUMENT OR NOTIFICATION OF AVAILABILITY

Federal Agencies

- U.S. Fish and Wildlife Service, Raleigh Ecological Services Field Office
- U.S. Environmental Protection Agency, Region 4
- Advisory Council on Historic Preservation
- National Oceanographic and Atmospheric Administration

American Indian Tribal Governments

- Eastern Band of Cherokee, Cherokee, North Carolina
- Cherokee Nation, Tahlequah, Oklahoma
- Tuscarora Nation, Lewistown New York
- United Keetoowah Band of Cherokee Indians, Tahlequah, Oklahoma

Leadership and Officers of the North Carolina Legislature

- The Honorable Marc Basnight, NC State Legislature
- Office of Congressman Walter B. Jones
- The Honorable William Culpepper, NC State Legislature
- Office of Senator John Edwards
- Office of Senator Elizabeth Dole

Other State and Local Government Officials

- Dare County Manager
- Town of Manteo, Mayor

State and Local Agencies

- NC Division of Coastal Management
- Outer Banks Chamber of Commerce
- North Carolina State Historic Preservation Office
- Dare County Schools
- Dare County Commission

- North Carolina Underwater Archeology Unit
- Outer Banks Visitors Bureau
- North Carolina Wildlife Resources Commission, Division of Wildlife Management, Nongame & Endangered Wildlife

Organizations and Businesses

- National Parks and Conservation Association
- Friends of Roanoke Island
- The Wilderness Society
- The Elizabethan Gardens of the Garden Club of North Carolina
- Nags Head Woods Preserve
- Sierra Club, North Carolina Chapter
- University of Virginia
- College of the Albemarle
- Taft and Taft Law Firm
- East Carolina University
- North Carolina Audubon Society
- North Carolina Aquarium
- Eastern National Parks and Monuments Association
- Virginia Company Foundation
- New York University, Department of History
- Enviro-Services, Inc.
- James River Institute for Archeology
- Center for Biological Diversity
- The Coastland Times
- Roanoke Island Business Association
- Island Breeze
- The Elizabethan Gardens, Inc.
- Defenders of Wildlife
- Outer Banks History Center
- Heritage Point Properties
- *The Lost Colony*, Executive Manager
- White Doe Inn
- University of Illinois, English Department

Media

- Outer Banks Sentinel

LIST OF PREPARERS

Information summarizing the names and experience for the preparers is listed in Table 16.

Table 16. List of Preparers

| Name | Degree | Professional Discipline | Years of Experience |
|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|---------------------|
| National Park Service, Fort Raleigh National Historic Site | | | |
| John Anglin | B.S. Wildlife Biology and Ecology | Operations Chief for the Division of Law Enforcement and Emergency Services | 30 |
| Bridget Bohnet | B.A. Recreation Management | Bodie Island District Ranger | 18 |
| Josh Boles | B.A. Philosophy | Supervisory Park Ranger | 5 |
| Rob Bolling | B.S. History | Park Ranger | 22 |
| Thayer Broili | M.S. Environmental Management | Chief of Resource Management | 38 |
| Mary Doll | B.A. Outdoor Recreation B.S. Criminal Justice | Chief of Interpretation | 30 |
| Darrell Echols | B.S. Marine Biology | Deputy Superintendent | 22 |
| Ellen Hand | B.A. Pre-law | Administrative Officer (Former) | 28 |
| Cyndy Holda | B.A. Parks & Recreation/ Physical Education | Public Affairs Specialist | 30 |
| Mike Murray | B.A. Biology | Superintendent (retired) | 33 |
| Paul Stevens | B.S. Parks and Conservation Management | Chief of Law Enforcement and Emergency Services | 27 |
| Doug Stover | M.A. Landscape Architecture | Historian | 30 |
| Barclay Trimble | B.B.A. Accounting | Superintendent | 21 |
| John Wescott | B.A. Political Science and History | Facility Operations Specialist | 35 |
| Angela Woody | Certificate Business Communication | Budget Analyst | 18 |
| National Park Service, Denver Service Center | | | |
| Greg Cody (reviewed GMP/EIS) | B.A. History, M.A. History | Cultural Resource Technical Specialist | 19 |
| Pam Holtman (reviewed GMP/EIS) | B.A. Economics, M.A. History | Cultural Resource Specialist, Contracting Officer's Technical Representative | 11 |
| Ryan Sharp (responsible for User Capacity section) | Ph.D. Natural Resources Management | Visitor Use Specialist (former) | 2 |
| Paul Wharry (reviewed GMP/EIS) | B.A. Biology | NEPA Technical Specialist and Natural Resource Specialist | 32 |
| National Park Service, Southeast Regional Office | | | |
| David Libman | B.AE (Aerospace Engineering), M.C.P. (Master of City Planning/Environmental Planning Emphasis) | Park Planner | 38 |

Table 16. List of Preparers

| Name | Degree | Professional Discipline | Years of Experience |
|----------------|----------------------------------------------------------------------------------|----------------------------------------|---------------------|
| Ben West | B.S. Biology, M.S. Ecology and Evolutionary Biology | Division Chief | 20 |
| Amy Wirsching | M.S. Natural Resources, B. Design Architecture | Community Planner | 8 |
| Parsons | | | |
| Steve Bach | Ph.D., Botany, M.S., Botany, B.S., Biology | Principal Scientist (Retired) | 37 |
| Alyse Getty | B.A. Environmental Science, B.A. Political Science | Project Manager | 31 |
| Drew Getty | MCRP, Environmental Planning, B.S. Environmental and Natural Resource Management | Environmental Planner | 4 |
| Ivie Goorsky | B.S. Mechanical Engineering | Senior Engineer (PE) | 8 |
| John Hoesterey | M.A. Geography, Regional Planning and Economics B.A. Zoology | Technical Director | 35 |
| Cortnie Lewis | B.S. Zoology M.S. Wildlife Science | Scientist | 12 |
| Alexa Miles | M.S. Landscape Architecture B.A. Environmental Studies | Environmental Planner | 9 |
| Trevor Moore | CompTIA A+ Certified | Graphic Design and Document Production | 5 |
| Diane Rhodes | M.A. Anthropology, B.S. Elementary Education | Senior Cultural Resource Specialist | 35 |
| Seth Wilcher | M.H.P. Historic Preservation, B.S. History / Education | Cultural Resource Specialist | 6 |