

FINDING OF NO SIGNIFICANT IMPACT



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Heritage Area Management Plan

Blue Ridge National Heritage Area
Western North Carolina

INTRODUCTION

A National Heritage Area is a place designated by the United States Congress where natural, cultural, historic, and recreational resources combine to form a cohesive, nationally distinctive landscape arising from patterns of human activity shaped by geography. These patterns make National Heritage Areas representative of the national experience through the physical features that remain and the traditions that have evolved in the areas. Continued use of the National Heritage Areas by people whose traditions helped to shape the landscapes enhances their significance.

When created in 1916, the National Park Service (NPS) was identified as the Federal agency responsible for preserving nationally significant natural and historic resources for present and future generations. National Heritage Areas are one way in which the NPS can carry out this mission by assisting the voluntary efforts of citizens to protect a local cultural landscape without governmental acquisition of the land itself. Once designated, National Heritage Areas are eligible for NPS support, including funding, legal guidance, technical assistance, and some administrative services.

The Blue Ridge National Heritage Area received its formal designation in November 2003 (Section 140 of P.L. 108-108, the Blue Ridge National Heritage Area Act of 2003), making it the Nation's 24th National Heritage Area. The BRNHA is comprised of an Indian reservation and 25 counties in western North Carolina encompassing

Alleghany, Ashe, Avery, Buncombe, Burke, Caldwell, Cherokee, Clay, Graham, Haywood, Henderson, Jackson, McDowell, Macon, Madison, Mitchell, Polk, Rutherford, Surry, Swain, Transylvania, Watauga, Wilkes, Yadkin and Yancey, and the Qualla Boundary. Five units of the national park system are located in the BRNHA, including the Blue Ridge Parkway, Great Smoky Mountains National Park, Appalachian National Scenic Trail, Overmountain Victory National Historic Trail, and the Carl Sandburg National Historic Site. A fifth unit, the Trail of Tears National Historic Trail, is under study to gauge the feasibility of extending existing trail networks into western North Carolina.

The Federal legislation which created the BRNHA also directed the Secretary of the Interior to enter into a cooperative agreement with the management entity of the BRNHA. That cooperative agreement, No. H 5041 04 A023, governs the transfer of NPS appropriated funds to the BRNHA. It sets out a Statement of Work which outlines the respective responsibilities of the NPS and the BRNHA. Under the agreement, both BRNHA and NPS agree to cooperate toward the successful development of the Blue Ridge National Heritage Area.

The BRNHA management entity has prepared a *Management Plan and Environmental Assessment (MP/EA)* to guide its management of the heritage area for the next 10 years. This plan has been prepared to meet the requirements of the NPS. The MP/EA's purpose is to chart a course of action and provide meaningful reference materials for the BRNHA as it invests effort and resources from 2008 to 2018 in pursuit of its mission to protect, interpret, and develop heritage resources in western North Carolina. The MP/EA must meet informational and management needs of the BRNHA from both an organizational and an operational perspective while remaining consistent with the BRNHA's Federal authorizing legislation and NPS administrative and environmental compliance requirements. The purpose of the EA was to evaluate the environmental effects of five possible management alternatives, each of which could serve as the BRNHA's selected management approach.

The BRNHA Board of Directors (Board), with involvement and approval from the NPS, has selected Alternative E as its management approach. It represents an approach to management that helps ensure that the resources upon which heritage development and education activities are built can be sustained over the long term. Furthermore, it ensures that goals and objectives related to heritage preservation, development, and education receive equitable treatment over time. The selected approach is also intended to help local partners build and sustain their capacity to manage expected increases in heritage related tourism caused not only by BRNHA's activities but other groups' efforts. These outcomes should minimize the potential for adverse environmental impacts while maximizing the potential for BRNHA to facilitate long term sustainable economic development.

SELECTED ALTERNATIVE

Alternative E: Management with Goal Integration

Alternative E is somewhat of a hybrid management approach formulated by subtracting some elements of the Status Quo (Alternative A) revealed through the EA to be a problem for the heritage area environment and adding selected attributes of the other alternatives that should produce beneficial environmental impacts and facilitate attainment of other management goals. Alternative E aims to simultaneously preserve and protect important heritage resources while facilitating heritage based tourism and development. Under the selected alternative, these goals are being pursued at both the organizational and operational levels.

Organizational Framework

The BRNHA is a non-profit 501 (c) 3 organization governed by a nine member Board comprised of appointees made by the Governor of North Carolina, Advantage West Economic Development Group, Eastern Band of the Cherokee Indians (EBCI), Education and Research Consortium, and HandMade in America. Board membership will include roughly equitable representation among interests representing each of the heritage preservation, interpretation, and development emphases fundamental to the BRNHA mission. The organization will be managed by an Executive Director hired by the Board, and four

core staff who are hired and managed by the Executive Director. While no plans currently exist to add staffing, one additional person may be needed at a future date to facilitate and capitalize on certain funding opportunities and to coordinate the functions of a Preservation Task Force (PTF). In the interim, these duties may be spread among existing staff and partners. Outreach with local communities in the BRNHA will be performed in concert between BRNHA staff and five heritage tourism officers who are employees of the North Carolina Department of Commerce (NCDOC). The NCDOC provides an in-kind contributed service that has substantial monetary value and can be utilized to leverage Federal funding and other grants when a non-Federal match is required. The BRNHA will have a local presence in each of the counties and on the Qualla Boundary through the 26 Local Heritage Councils (Councils) formed over the last few years. A PTF will be created from among Board members and select local council members internal to the BRNHA organization and government agencies and private preservation groups external to the organization. The PTF will assist with strategic planning, local partner outreach, and programmatic recommendations. The PTF is necessary to help buffer the very real threat that growth pressures in the region pose to the viability of the region's heritage capital even in the absence of BRNHA's own efforts to promote tourism. The interpretation and development stimulated by BRNHA will likely compound these pressures. The BRNHA will serve as a point of contact and central organizing and coordinating figure among the Councils, the heritage tourism officers, the PTF, and other heritage constituencies. Organizational priorities will drive programmatic operations for the next 10 years.

Operational Framework

Partnership is critical to the successful execution of programmatic activities and the accomplishment of operational goals and objectives. The Councils, as a part of the internal organizational structure of the BRNHA, have an obvious important role to play in the preservation, interpretation, or development of the natural, Cherokee, craft, music, and agricultural heritage of western North Carolina. Their plans and priorities have helped inform specific strategies and actions that the BRNHA will undertake, and those will continue to function in this regard. Additionally, many of those

partners who comprise the Councils will be ideal executors of BRNHA programmatic intent. Program implementation will not be limited to local councils, however; government agencies, non-profit groups, private firms, and even individuals who exist outside of the BRNHA organizational structure and who have good ideas that mesh well with its goals and objectives will be encouraged to present them for consideration. The BRNHA will apply both a pro-active approach to management through recruitment of partners to help fulfill certain operational priorities developed in this plan and a re-active approach to management by responding favorably to good ideas initiated by possible implementation partners. ‘Good ideas’ are defined by those that mesh well with the plan’s stated goals, objectives, strategies and actions.

Effective communications between the Councils and other groups and BRNHA decision makers will be essential to the translation of good ideas at the organizational level to actions on the ground that produce meaningful strategic results. Heritage tourism officers, furnished through the partnership between the State and the BRNHA, will play a large role establishing and maintaining these vital communications. The PTF members will also serve a valuable communication and networking function with not only the partners identified above but also with State trust funds, government agencies, and private foundations who have a dedicated interest in heritage resource preservation and can lend technical or financial resources to good projects.

Core program areas developed for operational fulfillment include grant making, marketing and promotions, research, and partnership development or facilitation. Programmatic emphases in regards to goals and heritage themes may shift from year to year as strategic opportunities are developed and annual operational plans are conceived by the BRNHA.

Grants Program

The BRNHA intends to allocate grant funds to preservation, interpretation and development-related projects at approximately equal levels over the life of the organization. Where possible, the BRNHA will seek linkages between goals and will emphasize

projects that attempt to address multiple goals. A high level of interaction between BRNHA staff, the PTF and Councils will mean that the grants program is an intentional effort to fulfill preservation priorities established in the MP/EA. With oversight from the Board and management, the PTF will participate in the grants program by: (1) helping to build and sustain a network among State trust funds, private foundations, the BRNHA, and local heritage councils; (2) assisting implementation partners with the formulation of the grant application process; and (3) providing feedback on proposals. The PTF will also help disseminate information about the grants program to potential partners at the local and regional level. Strategic partnerships will be explored with a variety of funding organizations and mechanisms to lay the groundwork for effective solicitation of matching contributions by implementation partners. A BRNHA staff position will be dedicated to building these partnerships.

Marketing and Promotions Program

The marketing and promotions program is comprised of six different initiatives: (1) a signage campaign; (2) the creation of heritage trail guides; (3) a Go Blue Ridge card; (4) an I-Wall at the Blue Ridge Parkway Destination Center; and (5) marketing boot camps. While (6) the BRNHA web site serves multiple functions, it is also deliberately utilized as a marketing and promotions tool. The focus of these programmatic initiatives is on promoting tourism and heritage-based economic development. However, activities will be undertaken that promote integration among interpretation and preservation objectives. Opportunities will be sought to educate tourists, some of whom will likely become new residents, about heritage preservation and environmental stewardship needs in the region. Marketing will also be conducted with the intention of not only promoting the heritage of the region but also generating revenue to help sustain BRNHA as a viable organization over the long-term.

Research Program

The research effort will primarily focus upon the heritage development and preservation goals with the understanding that data and information produced through this program will, by default, also meet some interpretation and educational objectives. Heritage development research will gauge the vitality of the local tourism

industry, assess visitor preferences, and quantify the economic impact of tourism to the region. Tourism studies will be undertaken to not only help stimulate heritage-based tourism and development but with the intention of also gauging how these economic benefits also assist with important preservation and interpretation goals and objectives. Heritage preservation research will attempt to quantify the economic benefits of heritage preservation, track recovery (or lack thereof) of endangered heritage resources, and to inventory and prioritize different preservation efforts throughout the region. Research will be used to inform both the grants and marketing and promotions programs of worthy projects and attractions to feature. Periodically over the next 10 years, the BRNHA plans to draft a ‘State of Heritage Tourism’ report that discusses goals and objectives of the BRNHA, how each have been or are in the process of being met, and that discusses the economic benefits of heritage tourism and how heritage resources have been protected via tourism.

Partnership Program

Elements of the partnership program were addressed previously in the section on organizational framework. The BRNHA will remain receptive to all potential partnerships that fulfill its mission, goals, and objectives and welcome proposals from organizations and individuals not yet defined who believe they have good ideas to do just this. However, the BRNHA will also actively recruit participation from among certain organizations it believes have a vital, strategic role to play in heritage preservation, development, and interpretation.

ALTERNATIVES CONSIDERED

Alternative A: Status Quo

Alternative A was not selected because of its neglect for environmental protection mechanisms and planning that is needed to accommodate the large numbers of tourists that would be stimulated by heritage tourism and development activities. Alternative A will create a variety of adverse environmental impacts over the long term and risk exhausting or degrading heritage resources upon which heritage based tourism and economic development depends.

The same essential organizational and operational structure as described in Alternative E exists in Alternative A with a few key exceptions. First, heritage development and general economic development interests were disproportionately represented in the organizational chart through the composition of the Board, the three Host Groups, and Councils. Second, no PTF existed. This structure likely influenced early programmatic direction so that emphases were largely placed on marketing and promotions of the region with the goal of stimulating more tourism and heritage-based economic development. Alternative A, if continued, would probably combine with other ongoing efforts in the region to cultivate an environment that attracts and retains more tourists, facilitates widespread travel throughout the region, and provides them with greater opportunities to spend money. While this may benefit some heritage development goals, it would also likely lead to substantial environmental impacts over time.

Adverse environmental impacts would be most likely to come from: 1) increased use of and interaction with the environment by tourists and new residents; and 2) construction and other development-related activities associated with the expansion and growth of commercial and residential enterprise to support the demands of increasing tourist and resident populations. Concern also existed about the ability of this alternative to produce long-term economic benefits because of the fear that the heritage capital upon which long term economic benefits depend may inadvertently be sacrificed in the rush to stimulate heritage-based economic development.

Alternative B: Management with a Heritage Preservation Emphasis

Alternative B was not selected because it did not place enough emphasis on stimulating increased economic opportunity in the region - an integral component of the BRNHA mission.

There are substantial organizational similarities between Alternatives E and B. One, the Board would over time include some appointees who represent resource preservation interests. Secondly, a PTF would be created. One key difference is that the Councils would also be required to have active representation by heritage preservation interests. Under the Status Quo, it is clear that heritage preservation

interests are underrepresented in some Councils. Programmatically, 60 percent of effort would be invested on heritage preservation goals. Even projects undertaken in furtherance of interpretation and development goals would be required to demonstrate how heritage preservation objectives would also be fulfilled.

All of the above, combined with substantial opportunities that now exist in North Carolina with different heritage trust funds, would likely produce substantial environmental benefits throughout the region. Environmental benefits would be expected from: (1) direct annual expenditures to groups working to preserve heritage resources and environmental assets; (2) deliberate marketing and promotional messages that produce more advocates and supporters of the region's heritage resources and environment; (3) the use of a PTF in helping to align BRNHA plans and activities with State and Federal land managers' plans for environmental protection; (4) strong participation of preservation interests on all heritage councils and the use of the PTF in support of local initiatives that preserve important environmental resources; and (5) deliberate use of programs to help build local capacity for planning that should help protect environmental resources. Alternative B would help ensure that visitors to the BRNHA will be able to experience over the long term the heritage resources of western North Carolina. Because efforts already expended on heritage development would continue to stimulate tourism, and up to 40 percent of effort over the next 10 years would still be invested with that purpose in mind, some adverse environmental impacts as described in Alternative A would also likely occur.

Alternative C: Management with a Heritage Interpretation Emphasis

Alternative C was not selected because, at least in the immediacy, substantial environmental impacts would occur as increasing numbers of tourists come into direct contact with heritage resources that are afforded limited protection. While substantial opportunity would exist to educate and encourage among these visitors proper stewardship and support for conservation mechanisms, this is essentially a 'hoped-for' outcome that is not guaranteed.

The same essential organizational and operational structure as described in Alternative E exists in Alternative C with a few key exceptions. One is that the Board would include appointees who represent resource interpretation interests. It could be argued that under the Status Quo, the Board already contains interpretation/education interests. While this may be true, these members also represent heritage development interests in a strong way and it was deemed through the analysis that their representation would be most accurately categorized as development interests. Secondly, an Interpretation Task Force (ITF) would be created instead of a PTF. The ITF would assist with strategic planning, local partner outreach, and programmatic recommendations. A more active approach to facilitating heritage interpretation should result. Sixty percent of programmatic emphasis would be allocated annually to heritage interpretation efforts with the remaining 40 percent of effort reserved for preservation and development of those resources. Links between heritage preservation and development and how they facilitate heritage interpretation would be more clearly established. Under the management approach emphasizing interpretation, program initiatives would be constructed and executed with the primary purpose of increasing awareness and appreciation for important heritage resources as an intrinsic value unto itself and securing funding that would perpetuate the pursuit of that objective. Efforts already expended on heritage development over the last 3 years would continue to stimulate tourism, and up to 40 percent of effort over the next 10 years would still be invested with that purpose in mind.

Many of the adverse environmental impacts discussed under the Status Quo would still be relevant in Alternative C and at close to the same intensity. This is because heritage interpretation is likely to more immediately lead to heritage tourism and development than to heritage preservation. Additionally, some of the heritage interpretation activities would likely be of an experiential quality- -thereby putting more tourists and residents in direct contact with heritage resources. Some beneficial impacts to the environment would be expected as awareness among tourists translates ultimately into

their political and financial support for conservation. However, there would be no programmatic mechanisms in place under Alternative C to encourage this behavior and track this as an outcome.

Alternative D: Management with a Heritage Development Emphasis

Alternative D was not selected because it did not place enough emphasis on protecting, preserving, and interpreting the heritage resources of western North Carolina - integral components of the BRNHA mission.

Alternatives D and the Status Quo are very similar but with two fundamental differences. One is the formation of a Development Task Force (DTF), as opposed to a PTF and ITF. The DTF would help to ensure that projects undertaken in fulfillment of the heritage development goal relate directly to the MP/EA. This means that substantial attention would be placed on helping local partners increase their capacity for planning and infrastructure that is necessary to a community's ability to adequately service the demands expected from an ever increasing tourist base. The attention placed on these community development needs would be expected to produce a number of environmental benefits. A second difference is that at least 60 percent of effort would be devoted to these and other types of community and heritage-based development projects. The financial impact should be substantial due to opportunities to coordinate with State, Federal, and private granting programs dedicated to economic development. Substantial environmental disruptions from tourism and growth and development may also occur due to the emphasis that would still be placed on stimulating tourism and because many infrastructure improvements, by their very nature, are environmentally disturbing activities.

Environmentally Preferred Alternative

The environmentally preferred alternative is the alternative that "causes the least damage to the biological and physical environment and best protects, preserves, and enhances historic, cultural, and natural resources" (*Forty Most Asked Questions Concerning Council on Environmental Quality's (CEQ) National Environmental Policy Act Regulations, (NEPA)* [CEQ 1981]). Alternative B, management with a preservation emphasis, is the environmentally preferred approach.

This conclusion has been reached by comparing expected beneficial and adverse impacts to the heritage area environment from each of the five management alternatives.

Alternative E, the selected alternative, is not the environmentally preferred approach. However, Congress has given the BRNHA the responsibility not only of managing, preserving, protecting and interpreting cultural, historical, and natural resources, but also of "continuing to develop economic opportunities" and "encouraging economic viability" in the heritage area. Alternative E best enables the BRNHA to accomplish all of these goals. Alternative E provides environmental benefits with minimal environmental disruptions second only to Alternative B.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

Summary of Environmental Consequences

Alternative E, management with goal integration, produces no overall adverse impacts and minor beneficial impacts in each resource category. It would not be expected to produce as great of benefit to natural resources, landscapes and visitor use as Alternative B. Nor would it be expected to produce as great of benefit to cultural resources or the socio-economic environment as Alternative D. Little is risked and major gains for the BRNHA should be expected after years of methodical execution of management intent. It is the most balanced approach of the alternatives given and one that should enable the BRNHA to realistically succeed in pursuing the sometimes seemingly contradictory intentions of stimulating economic opportunity in the region while preserving its environmental qualities.

Natural Resource Categories

Alternative E should produce a net minor beneficial impact to natural resources in the heritage area when beneficial and adverse impacts are factored together. It is probable that some adverse impacts to natural resources would occur from an expanding tourist population and associated construction and development, both of which would

be stimulated to some degree by BRNHA activities. However, substantial beneficial impacts should be expected from (1) direct annual expenditures via the grants program to groups working to preserve natural resources; (2) deliberate marketing and promotional messages that produce more advocates, supporters, and stewards of the region's natural resources; (3) the formulation and use of a PTF in strategic planning and in the cultivation of natural resource preservation initiatives at the local and public land management level; (4) deliberate use of programs to help build local capacity for both planning and infrastructure projects that meet the dual functions managing growth and development and protecting natural resources. Additionally, the BRNHA would fulfill a vital partnership role and at an opportune time considering the different private and State partners in the region focused on natural heritage preservation and the availability of significant amounts of grant dollars dedicated by the State of North Carolina to heritage preservation.

Land Resources. Land preservation efforts facilitated by BRNHA could over time reduce the amount of available in-holdings or properties adjacent to critical resource areas in the public lands, protect some of the steeper slopes in the region, and reduce erosion on those same highly erodible areas. Marketing messages that promote and educate the public about the importance of unobstructed views of slopes, peaks, and floodplains to visitor experience would resonate with some visitors and residents and facilitate behavioral changes such as the building of homes in less conspicuous areas and using site planning and landscaping techniques to reduce erosion and screen or buffer scenic impacts. Local planning and infrastructure projects encouraged by BRNHA could help address issues with steep slope and floodplain development and erosion on private lands.

Water Resources. The use of the grants program to facilitate local planning initiatives in certain counties lacking any watershed plan could set the stage for later partnerships with funding entities such as the North Carolina Clean Water Management Trust Fund to help pay for preservation of water resources and greenway and park projects. Marketing messages that simultaneously promote the region's outstanding water resources while educating about the role of proper site planning and sediment and erosion controls in

preserving these water resources would resonate with some residents and newcomers and likely facilitate behavioral modifications at some level. Local planning and infrastructure projects could help address issues associated with water supply, wastewater treatment, subdivision and development, and sediment and erosion control--all of which could help minimize or reduce adverse impacts on water resources.

Biological Resources. The use of the grants program to facilitate natural heritage inventory needs that remain in almost half of the counties in the BRNHA could set the stage for later partnerships with the North Carolina Natural Heritage Trust Fund to preserve significant habitats. Grant funds could also be used by local governments in planning efforts that identify important habitats and species in their communities so that they can be acknowledged and protected as development occurs. Local planning and infrastructure projects such as those noted under water resources could help address issues associated with both aquatic and land based critical habitats and important species.

Recreational/Scenic Resources. The use of the grants program to help pay for local level planning initiatives in those 14 counties lacking greenway and park master plans could set the stage for later partnerships with the North Carolina Clean Water Management Trust Fund and North Carolina Parks and Recreation Trust Fund to help pay for preservation of lands in support of greenway and park projects. It would not be expected that marketing and promotional efforts would produce a substantial number of greenway and park advocates, in part because many tourists already recognize the exceptional numbers of recreational amenities already offered by the national and State parks and forests. However, such a promotional program that simultaneously encourages visitation but that also educates the public about threats to the scenic resources that they enjoy could produce advocates of scenic resource preservation. Local planning and infrastructure projects such as those noted under both water and biological resources could help address greenway and park needs.

Cultural Resource Categories

Alternative E should produce a net minor beneficial impact to cultural resources in the heritage area when beneficial and adverse impacts are factored together. It is probable that some adverse impacts to cultural resources would occur from an expanding tourist population and associated construction and development, both of which would be stimulated to some degree by BRNHA activities. However, environmental benefits should come from: (1) direct annual expenditures to groups working to preserve cultural resources; (2) deliberate marketing and promotional messages that produce more advocates, supporters, and stewards of the region's cultural resources; (3) the formulation and use of a PTF in strategic planning and in the cultivation of cultural resource preservation initiatives at the local and public land management level; and (4) deliberate use of programs to help build local capacity for both planning and infrastructure projects that meet the dual needs of growth management and cultural resource protection.

A danger exists, however, that in attempting to minimize adverse impacts from tourism and development that BRNHA could overshoot its target, minimizing the beneficial impacts expected to accrue from these activities. Under Alternative E, great care would need to be taken to ensure that management does not focus so tightly on activities designed to preserve and protect cultural resources that it neglects the role that markets can play in the perpetuation of these traditions.

Cherokee Resources. Alternative E will probably produce some minimal adverse environmental consequences because of its stimulation of tourism and the subsequent growth and development that are likely to occur in response to tourist demands. While these issues are of concern, the probability of these occurring is less in Alternative E than in the other Alternatives with the exception of Alternative B. The EBCI currently holds power of appointment of one Board member and additional Cherokee involvement in the PTF should help reveal Cherokee resource preservation needs and opportunities and cultivate projects that fulfill goals and objectives that overlap with EBCI. While some benefits could possibly be gained through BRNHA assistance with local planning on the Qualla

Boundary, experience suggests that the EBCI already pays attention to possible impacts that development related projects may have on historic and cultural sites.

Craft and Music Resources. If the survival of traditional craft and music depends to some degree on attracting and retaining people who will purchase traditional craft and music products and attend craft and music institutions, then it must be recognized that Alternative E should help fulfill that need. Investments in marketing, promotions, and business development should help stimulate the widespread and long term demand for traditional mountain arts, craft, and music that is also essential to music and craft perpetuation. Substantial benefits should be expected from an increasing base of clientele to which crafters and musicians can sell their wares; and craft and music schools and institutions would likely benefit from greater pools of applicants as more people learn of these traditions and seek ways to incorporate them into their lives. The investments discussed in the summary on cultural preservation should stimulate a healthy dialogue that results in a balance in programmatic action between preservation and development.

Historic and Archaeological Sites. Potential adverse impacts are most likely to occur where local land use planning and historic/cultural inventories do not exist or are inadequate. By investing some effort on the heritage development goal on increasing capacity for local planning and management, Alternative E should reduce potential for adverse impacts. By investing some effort on the heritage preservation goal to surveys and inventories of important sites and structures, risk of adverse impact should also be reduced.

Landscape and Regional Identity

Alternative E should produce a net minor beneficial impact to landscape and regional identity when beneficial and adverse impacts are factored together. The BRNHA would fulfill a vital partnership role, considering the different private and State and local government partners in the region focused on landscape preservation and the availability of substantial State of North Carolina funding dedicated to heritage preservation. While some funding sources would likely emphasize high quality natural resources, there are others that will

support protection of farmland properties, greenways, and parks. Tourism and heritage based development initiatives and the potential adverse consequences that stem from these activities would still occur under Alternative E, although at a somewhat slower pace than under the Status Quo and Alternative D.

Alternative E essentially incorporates the beneficial aspects of Alternatives B and D that would be intended to protect and mitigate against adverse impacts to landscape and regional identity while maintaining core heritage development activities that are fundamental to the BRNHA mission. Adverse impacts from these activities identified in the Status Quo would be relevant in Alternative E, but at somewhat less intensity due to a reduced emphasis on heritage development and an enhanced emphasis on landscape preservation. As discussed under Alternative D, some infrastructure improvements such as water and sewer expansion and new road construction or widening projects can actually stimulate growth and development in such a manner that consumes and fragments open space. Projects such as this would be eligible for BRNHA support under Alternative E. Deliberate thought would need to be exercised by partners and decision makers when formulating projects so that the BRNHA does not compete against itself on the landscape preservation front. There is a danger that under Alternative E, the BRNHA could end up facilitating both landscape fragmentation and landscape preservation. This danger should be minimized, however, through (1) involvement of the PTF in strategic planning and decision making; (2) direct annual expenditures on preservation of natural areas, farmland, and other scenic properties important to landscape and regional identity; (3) deliberate marketing and promotional messages that produce more advocates, supporters, and stewards of landscape preservation and land use planning; and (4) deliberate use of programs to help build local capacity for planning that (in addition to facilitating infrastructure improvements) could also help protect landscape integrity. These programmatic initiatives should also stimulate beneficial impacts to the western North Carolina landscape.

Socio-Economic Environment

Alternative E should produce a net moderate beneficial impact to socio-economic conditions when beneficial and adverse impacts are factored together. Alternative E protects some components in the socio-economic environment through outright preservation of land resources and by building local capacity for planning and infrastructure improvements that are essential to sustained prosperity, the public health, and an overall high quality of life. This management approach would help stimulate economic development in the region, but more so in those niche markets of resource conservation, land planning, engineering, and architecture and less from heritage tourism related activities. Not as much beneficial or adverse impact would be expected from tourism and related development due solely to the decreased emphasis placed on those heritage development activities.

Visitor Use and Experience

Alternative E should produce a net minor beneficial impact to visitor use and experience when beneficial and adverse impacts are factored together. The minor beneficial ratings expected to natural, cultural, and landscape resources would have an exponential impact on protecting the qualities that are attractive to tourists and residents. Less emphasis on the heritage development goal should produce less tourists and less development, reducing the threats from overcrowding and overuse of certain resources. Greater emphasis on heritage preservation should help ensure that resources which attract tourists and residents remain viable over the long term. Because some effort would still be expended on heritage development, some increases in tourism and development would be expected to occur--creating opportunities for interaction with heritage resources. However, the emphasis placed on helping localities plan and prepare for expected increases in tourism and overall population growth should minimize expected adverse impacts. The significance of the PTF in this alternative should also override any tendency to utilize investments on planning and infrastructure improvements in a manner that would promote sprawl and disrupt landscape integrity important to visitor experience.

Impacts that may be both Beneficial and Adverse

Increasing numbers of tourists may have both beneficial and adverse consequences to the heritage area environment. Some of these people may become among the staunchest supporters, friends, and allies of the BRNHA and the conservation and stewardship of heritage resources. In the process of getting to that attitude and prior to manifesting desirable behaviors consistent with that attitude, they may very well trample over the very environmental qualities that make western North Carolina so unique. In Alternative E, activities undertaken in the research program should inform BRNHA of this danger, track status and recovery of endangered/threatened heritage resources, and provide a mechanism for quantifying the protection/preservation benefits achieved through heritage-based economic development.

Planning and infrastructure development can help a locality prepare for and better manage larger populations of tourists and new residents. Visitor experiences can be enhanced. Natural and cultural/historic resources can be afforded better protection. Local communities can realize more efficient and sustainable economic gains. However, planning and infrastructure improvements can also contribute to growth and development and the fragmentation of scenic landscapes. In Alternative E, the prominence of the PTF in BRNHA strategic planning and decision making should ensure that the concerns are addressed as community development projects are undertaken.

Degree of Effect on Public Health or Safety

Alternative E encourages local planning and investments in infrastructure improvement so that smart growth can occur and a high quality of life be maintained. The status of other planning initiatives, in particular in regard to water, wastewater treatment, and transportation are acknowledged in the MP/EA. This should prove to be a useful reference as BRNHA prioritizes where and when to assist local communities on these endeavors.

Unique Characteristics of the Geographic Area such as Proximity to Historic or Cultural Resources, Park Lands, Prime Farmlands, Wetlands, Wild and Scenic Rivers, or Ecologically Critical Areas

The BRNHA is almost 11,000 square miles in size and consists of one Indian reservation and 25 counties. It is impossible to go anywhere within western North Carolina and not encounter unique natural and cultural resources.

Twenty seven watersheds containing over 500 individual streams or river bodies have received the outstanding resource water designation by the State of North Carolina. Five rivers have received either a State or national scenic or wild designation, or a combination of these classifications. There are over 300 wild or hatchery supported trout streams in the BRNHA. Five units of the national park system are located in the BRNHA. Two national forests are located in the BRNHA.

There are eight State parks, four State forests, and four State natural areas located within the BRNHA. The North Carolina Natural Heritage Program has catalogued close to 300 significant natural areas in 13 counties of the BRNHA. This number will increase substantially when the program completes its inventories for the remaining 12 counties. Wetlands and bogs, aquatic habitats, and fine examples of natural woodland, cliff, and meadow communities--many of them rare--are all well represented in the region. The U.S. Fish and Wildlife Service has identified and designated critical habitat in 11 counties for at least 1 of 3 Federally endangered species that occupy the region (spruce-fir moss spider, Appalachian elktoe freshwater mussel, and the spotfin chub). While critical habitat has been designated for those 3 species, there are 15 other endangered species that have yet to receive that designation. Additionally, dozens more plants and animals are considered threatened or are labeled Federal species of concern.

Because the Cherokee historically inhabited large portions of western North Carolina, eastern Tennessee, north Georgia, and upstate South Carolina, significant Cherokee heritage sites are widespread in the region. They are located throughout many counties in the region, with a notable concentration in the far southwestern corner of the

BRNHA. Over 50 historic Cherokee towns or villages are located within the region. The Rutherford Trace and the Trail of Tears are but two unfortunate historical campaigns undertaken by the American government designed to exterminate or remove the Cherokee people and their culture from the southern Appalachians. Each of these events has left its mark on the landscape and the Cherokee people themselves. In addition to these military campaigns, the Overmountain Victory Trail (Revolutionary War) and Stoneman's Raid (Civil War) passed through the region. There are also over 220 historic or Century Farms.

These and other environmental resources factored in the environmental analyses of the MP/EA. Because of the plan's broad conceptual characteristics and because few site and time specific actions have been identified, it is difficult to predict with great confidence what actual impacts may be to certain resources. Some site and time specific activities that flow from the strategic direction given in the MP/EA may require additional NEPA directed EAs.

Degree to which Effects on the Quality of the Human Environment are Likely to be Highly Controversial

The stimulation of tourism has potential to be controversial in the region. This is primarily because the region is already experiencing tremendous growth and land use pressures. Alternative E seeks to promote some heritage-based tourism and economic development in the region, which will result in more people visiting the region. Some of these people will likely elect to move here, adding themselves to this controversial issue. Alternative E also encourages planning and preparations at the local level so that communities have the infrastructure and other capabilities to manage well expected increases in tourist and resident populations. Planning can be a controversial topic in some mountain communities as well.

Alternative E attempts to reconcile these issues related to growth and development through (1) appointment of some preservation interests on the BRNHA Board; (2) the establishment of a PTF to help identify and cultivate effective preservation projects associated with heritage resources; and (3) a de-emphasis of the heritage development goal compared to its former prominence in the Status

Quo. In addition, BRNHA's fundamental reliance on partnerships and voluntary solutions should quell at least some controversy. Local implementation partners are critical to the formulation of most projects that BRNHA will take on. While BRNHA may attempt to cultivate such prospective partners and projects, local communities must ultimately lead. Implementation of strategies and actions also rely on the voluntary participation of key stakeholders. BRNHA seeks collaboration.

Degree to which the Possible Effects on the Quality of the Human Environment are Highly Uncertain or Involve Unique or Unknown Risks

Analyses of proposed actions did not reveal the potential for any highly uncertain, unique, or unknown risks. Similarly, there were no public comments that reflected any such concerns.

Degree to which the Action may Establish a Precedent for Future Actions with Significant Effects or Represents a Decision in Principle about a Future Consideration

The selected alternative neither establishes a precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the Action is Related to other Actions with Individually Insignificant but Cumulatively Significant Impacts

There are multiple organizations promoting western North Carolina in the marketplace and attempting to draw tourists and home buyers to the region. Among them are the NCDOC, county tourism directors, the three Regional Host Groups, local chambers of commerce, private attractions, and private developers. The environmental impacts of an increasing number of tourists and subsequent growth and development that would be expected to arise to service this increasing population are thoroughly discussed in the EA. The addition of BRNHA's heritage development activities could combine with these efforts to produce cumulative adverse impacts.

For this reason, Alternatives A (Status Quo), C, and D were not selected. Alternative E de-emphasizes the heritage development goal from Status Quo levels. When it is undertaking projects in pursuit of the heritage development goal, emphasis is placed on increasing capacity of localities to plan and prepare for growing populations of tourists and residents. Alternative E stresses the preservation goal above Status Quo levels. The addition of preservation interests on the Board, the creation of a PTF, and the identification of numerous programmatic strategies and actions outlined in pursuit of the heritage preservation goal should produce ample beneficial environmental impacts and help to offset some of the adverse cumulative impacts from tourism, growth, and development.

Degree to which the Action may Adversely Affect Districts, Sites, Highways, Structures, or Objects Listed on National Register of Historic Places or may Cause Loss or Destruction of Significant Scientific, Cultural, or Historical Resources

Alternative E is likely to have negligible adverse impacts over the short and long term and produce minor short and long term beneficial impacts on cultural resources. This includes historic and archaeological resources, craft and music resources, and Cherokee resources. Alternative E is likely to produce no more than negligible adverse impacts in both the short and long term to the socio-economic environment, which includes the transportation infrastructure. It is expected to produce minor short term beneficial impacts and moderate long term beneficial impacts.

Degree to which the Action may Adversely Affect an Endangered or Threatened Species or its Critical Habit

Alternative E is likely to produce minor adverse impacts over the short and long term to natural resources, including endangered or threatened species and its critical habitat. It is projected to have minor short term and moderate long term beneficial impacts to these biological resources.

The use of the grants program to help pay for natural heritage inventory needs that remain in almost half of the counties could set the stage for later partnerships with the North Carolina Natural

Heritage Trust Fund to preserve significant habitats. Grant funds could also be used by local governments in planning efforts that identify important habitats and species in their communities so that they can be acknowledged and protected as development occurs. Local planning and infrastructure projects such as those noted under water resources could help address issues associated with both aquatic and land based critical habitats and important species. Comprehensive land use and development plans could be used to help identify important habitat areas and locations of species of conservation significance so that protective mechanisms could be incorporated during development activities.

Whether the Action Threatens a Violation of Federal, State, or Local Environmental Protection Law

Alternative E violates no Federal, State, or local environmental laws.

PUBLIC INVOLVEMENT

As described in Chapter 1 of the MP/EA, public input was widely sought throughout the planning process. In phase I, different members of the public were engaged in the formation of Councils in all 25 counties and on the Qualla Boundary. Public meetings were held in each county and on the Qualla Boundary to help develop lists of important local heritage resources and development projects that would benefit those resources and the region. In phase II which consumed most of 2007, the public was invited to provide comments at four distinct points in the planning process.

1. A Scoping Notice (Notice) about the MP/EA in general was posted in February and March 2007 in six newspapers that service the western North Carolina region. A posting was also made on the BRNHA website. At this time the public was informed that drafts of different sections of the plan and other pertinent information would be periodically posted on the BRNHA website over the next 6 to 9 months. The public was encouraged to review and comment. The Notice also provided contact information for the BRNHA

- and the technical consultant and encouraged people not having computer access to contact either of these entities directly to obtain this information.
2. A summary of the purpose, intent, goals and objectives of the MP/EA was posted in April 2007 on the BRNHA website and submitted to all interdisciplinary team members for posting in their agencies and with local governments in the region. This was done to provide clarifying material to the earlier Notice.
 3. A draft of the Heritage Resource Inventory (what is now Chapter 3 and Appendix 1) was posted on the BRNHA website in May 2007 and the public was invited to comment.
 4. A Notice outlining the purpose and need for an EA and the different management alternatives under examination by the EA were posted on the BRNHA website in July 2007.
 5. A final draft version of the MP/EA was posted on the BRNHA website in November 2007. The public was given 30 days to comment on this final draft plan.

A record of all public comments was made and filed for the final record. These are shown in Appendix 4 of the MP/EA along with a response from the technical consultant and Executive Director (called BRNHA Response).

CONCLUSION

I find that the selected alternative does not constitute a major Federal action significantly affecting the quality of the human environment. Therefore, in accordance with NEPA and regulations of the CEQ (40 CFR 1508.9), an Environmental Impact Statement will not be prepared for the project.

Recommended: *Elean Sammons J* Date: *April 30, 2008*
Executive Director, Blue Ridge National Heritage Area

Approved: *Aht Fredrick* Date: *5/20/08*
Acting Regional Director, National Park Service
Southeast Region



STATE OF NORTH CAROLINA
OFFICE OF THE GOVERNOR
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MICHAEL F. EASLEY
GOVERNOR

April 29, 2008

The Honorable Dirk Kempthorne
Secretary of the Interior
United States Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Kempthorne:

I am pleased to express my support of the proposed Blue Ridge National Heritage Area Management Plan as required pursuant to the Blue Ridge National Heritage Area Act of 2003.

The proposed management plan is the product of a three-year planning process, which included extensive collaboration and consultation among the Blue Ridge National Heritage Area board and staff, the National Park Service, key state and federal agencies, local governments, and many other concerned parties. The resulting plan reflects not only the rich natural and cultural heritage of the Blue Ridge National Heritage Area but also the complex socioeconomic and demographic characteristics of this special place. Moreover, it provides an important tool to guide the management and protection of this unique and vital area over the next decade.

The State of North Carolina and its partners look forward to working with the National Park Service to ensure the promotion, protection, and preservation of the Blue Ridge National Heritage area in the coming years, and I respectfully request your expeditious approval of the proposed management plan. I thank you for your consideration of this request.

With kindest regards, I remain

Very truly yours,

A handwritten signature in black ink that reads "Michael F. Easley".

Michael F. Easley

MFE/jlb



