

Vine, Landon

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**From:** Fox, Lori  
**Sent:** Thursday, December 10, 2009 3:01 PM  
**To:** Sundar, Danielle  
**Cc:** Wetmore, Doug  
**Subject:** FW: Fw: draft floodplains SOF for CAHA ORV mgmt plan/DEIS

**Categories:** Projects/ CAHA

For CAHA admin record. Doug, can you forward Danielle the latest AMOY email for the record as well?

Lori Fox  
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-----Original Message-----

**From:** Sandra\_Hamilton@nps.gov [mailto:Sandra\_Hamilton@nps.gov]  
**Sent:** Thursday, December 10, 2009 7:54 AM  
**To:** Cherry\_Green@nps.gov; Kevin\_Noon@nps.gov  
**Cc:** Wetmore, Doug; Fox, Lori  
**Subject:** Re: Fw: draft floodplains SOF for CAHA ORV mgmt plan/DEIS

Hi Cherry / Kevin,

Sorry for the delay responding to your email, Cherry. I asked Doug Wetmore from Louis Berger, our NEPA contractor for the ORV Mgmt Plan/EIS, about previous discussions on the need for a wetlands SOF and below highlighted is what he sent me this morning.

I spoke with Nancy who had originally had a conference call with Cherry and Kevin Noon. Kevin had indicated that a SOF wouldn't be required unless the NPS was opening up new beach areas to ORV use or if structures were being built in wetlands. I don't think we'll need a SOF, but it would probably prudent to get Kevin/Cherry on the phone to confirm this, as the original discussion occurred before all the alternatives were finalized. I also think it wouldn't be required because the preferred alternative (and other action alternatives) will result in less beach driving than what was occurring prior to this plan (SMAs, night driving restrictions, permits, fencing off soundside wetland veg, etc).

Here is the wetlands impact analysis for the preferred alternative F. Do we need a call to discuss, or are you comfortable with us not doing an SOF?

Impacts of Alternative F: Management Based on Advisory Committee Input

Alternative F would involve the construction and relocation of ORV access ramps, the construction or expansion of public parking areas, and the establishment of new interdunal roads and trails. To protect soundside wetlands and vegetation under alternative F, protective signage would be installed at all soundside access points to reduce the potential for resource damage from ORV use, thereby resulting in a beneficial impact. Although alternative F includes additional measures for wetland protection on the soundside, long-term, negligible adverse impacts to wetlands would occur due to the potential for ORVs driving over wetland vegetation along and adjacent to interior routes (including the expanded interdunal road network) and access roads that lead to sound-side destinations.

Implementation of alternative F would involve the installation or relocation of 9 ORV access ramps, construction or expansion of 12 public parking areas, and the establishment of 3 new interdunal roads and 2 pedestrian trails. All new access ramps and parking lots would be located exclusively in upland areas, thereby avoiding impacts to wetlands. Ramps and parking areas would be constructed using environmentally sensitive standards to minimize stormwater runoff, as detailed under alternative C. Under alternative F, new interdunal roads are proposed from ramp 45 to ramp 49, off of the Pole Road near Hatteras Inlet, and extending off of ramp 59 near North Ocracoke Spit. Wetland maps indicate that there is a sufficient upland area in which to develop these interdunal roads. Therefore, direct wetland impacts from the interdunal road extensions would be avoided, although heavy use of the roads could result in inadvertent wetland damage if vehicles were to leave the road surface for any reason. The proposed pedestrian trail and interdunal road extensions would not require any formal surfacing or removal of vegetation and would avoid all wetland features.

Overall, under alternative F, there would be short term, negligible adverse impacts to marine intertidal wetlands due to continued off-road vehicle use in these areas and long term negligible adverse impacts to wetlands due to direct damage from ORV use in and around vegetated wetlands on the sound side and along interior ORV routes. Impacts to soundside wetlands would remain at a negligible level due to the protection provided by the installation of signage.

Construction activities under alternative F would avoid wetland areas resulting in indirect, long-term, negligible, adverse impacts to wetlands.

Cumulative Impacts. Past, present, and reasonably foreseeable future actions that have the potential for cumulative impacts under alternative F would be identical to those described under alternative A. The effects of these actions—when combined with the short- and long-term, negligible adverse impacts to wetlands under alternative F—would result in long-term, minor to moderate, adverse impacts on wetlands in the area of analysis.

Conclusion. There would be short- and long-term, negligible adverse impacts to wetlands resulting from the implementation of alternative F, due to continued vehicle use on marine intertidal wetland areas, and the potential for damage to soundside and interdunal wetlands from ORV use adjacent to existing and proposed interdunal roads. Cumulative impacts under alternative F would be long-term, minor to moderate, and adverse. There would be no impairment of wetlands as a result of the implementation of alternative F.

Table 43. Summary of Impacts to Wetlands Under the Alternatives

0025002

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Cherry  
Green/Atlanta/NPS

11/27/2009 10:33  
AM

Sandra Hamilton/DENVER/NPS@NPS

To

cc

Subject

Re: Fw: draft floodplains SOF for  
CAHA ORV mgmt plan/DEIS(Document  
link: Sandra Hamilton)

Sandy,

I did not see a copy of the final draft Floodplains SOF, so I will defer to Gary's determination and approval of the SOF. Could you send me a final draft of the SOF and are you waiting to complete the Wetlands SOF after the preferred alternative is selected?

Thanks,

Cherry Green  
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Sandra  
Hamilton/DENVER/N  
PS

11/25/2009 06:34  
PM

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Echols/CAHA/NPS@NPS, Margaret  
Carfioli/CAHA/NPS@NPS, Cherry  
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To

cc

Subject

Fw: draft floodplains SOF for CAHA  
ORV mgmt plan/DEIS

Hello All,

If you are comfortable with Gary's determination that the draft SOF is OK as is, then you can save yourself the effort of reviewing it. Just let me know if you are/are not planning to review/comment, please.

Doug: when would you need us to have any changes to you?

Sandy

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----- Forwarded by Sandra Hamilton/DENVER/NPS on 11/25/2009 04:30 PM -----

Gary  
Smillie/FTCOLLINS  
/NPS

Sandra Hamilton/DENVER/NPS@NPS

To

11/24/2009 03:51  
PM

cc

Subject

Re: Fw: draft floodplains SOF for  
CAHA ORV mgmt plan/DEIS(Document  
link: Sandra Hamilton)

Sandy -

I took a quick look at the ORV Statement of Findings and think it is good, as-is. As we discussed on the phone, an SOF may not really be required for this project because we do not think that adverse impacts to the floodplain will occur. But given the contentiousness of the project, I think you were wise to get this documented.

Let me know if I can be of further assistance.

Gary

Gary M. Smillie, Hydrology Program Lead  
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