

APPENDIX FOUR: PUBLIC COMMENTS AND BRNHA RESPONSE



As described in Chapter 1, public input was widely sought throughout the planning process. In phase I, different members of the public were engaged in the formation of local heritage 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 about the management plan and environmental assessment 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 Blue Ridge National Heritage Area 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 - 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 & objectives of the management plan was posted in April 2007 on the BRNHA website and submitted to all IDT members for posting in their agencies and with local governments in the region. This was done to provide clarifying material to the earlier scoping 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 scoping notice outlining the purpose and need for an environmental assessment 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 management plan and environmental assessment 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 this appendix along with a response from the technical consultant and Executive Director (called Planner Response). Most of the responses follow the full comment from each individual. However, some individuals had multiple comments that necessitate a response inserted into the comment text.

Comment 1

From: Parkslands@aol.com
To: brnha.info@equinoxenvironmental.com
Subject: plan
Date: Saturday, March 31, 2007 5:06 PM

Where does one find a copy of the draft plan?

PLANNER RESPONSE - Automated Reply 1: *In a message dated 3/31/2007 5:10:30 PM Eastern Daylight Time, Thank you for your comments on the Blue Ridge National Heritage Area Management Plan and Environmental Assessment. All comments will be carefully reviewed and considered for inclusion into this work.*

Comment 2

From: Parkslands@aol.com
To: brnha.info@equinoxenvironmental.com
Subject: Re: BRNHA Comments
Date: Saturday, March 31, 2007 5:11 PM

How can one comment on something that is not accessible? I hope this will not continue the process of excluding the public that existed heretofore.

PLANNER RESPONSE #1 - *Thanks again for your interest in the Blue Ridge National Heritage Area Management Plan and Environmental Assessment. The draft copy of the Management Plan is scheduled to be completed for review in late July 2007. It will be accessible on the Blue Ridge National Heritage Area website. Please continue to visit the website to view updates as they are added. <http://www.blueridgeheritage.com/AboutUs/EnvironmentalAssessment.html>. Also, if you would like, I can send you a copy of the draft management plan when it is ready. If you have any questions or concerns*

that you would like to share with me at this or any time, you can reply to this email, or call me at 828.253.6856 ext.210. I will be happy to discuss our process with you.

PLANNER RESPONSE #2 - Monday, April 23, 2007 4:31 PM

Hello,
I wanted to let you know that the "Purpose and Scope of the Management Plan" for the Blue Ridge National Heritage Area is now online and available for public review. You can find it by following the link: <http://www.blueridgeheritage.com/AboutUs/EnvironmentalAssessment.html> and clicking on the pdf link at the bottom of the page. Thanks again for your interest in the BRNHA Management Plan and Environmental Assessment. We look forward to receiving your comments.

Comment 3

Charles Miller
P.O. Box 724
Waynesville, NC
28786
828.456.5023

March 27, 2007
 3:30pm
 Via phone call

Charles Miller is a historian and citizen of Waynesville, and is a specialist regarding the Rutherford Trace/Expedition, stretching from Old Fork to Murphy. He has been working with Senator Joe Sam Queen on the Haywood Rutherford Trace Committee, and they will be releasing a brochure regarding the trace on April 12, 2007. He has been following the development of the BRNHA and wanted to know more about what was occurring. Generally, Mr. Miller feels that the Revolutionary War Heritage of the BRNHA area is underrepresented in interpretive opportunities.

"Charles Miller, a Waynesville resident and avid historian on the Haywood Rutherford Trace committee, has been collecting documents and researching Rutherford Trace since 1972. Miller is a

descendent of several Rutherford Trace militia members including Peter Mull, his fifth-great grandfather and a captain at the Battle of Kings Mountain. Having culled through research to piece together what happened that summer of 1776, Miller has amassed a wealth of information he shares with historical groups in counties throughout Western North Carolina. Eventually, he intends to put his findings in a book.” Source: http://www.smokymountainnews.com/issues/08_06/08_23_06/fr_rutherford_trace.html

PLANNER RESPONSE - Mr. Miller was thanked for bringing this area of heritage resources to the attention of EE staff, and he was informed that his comments would be considered in the data for the Heritage Resource Inventory portions of the Management Plan. In the final planning document, a discussion of the Rutherford Trace occurs in Chapter 3 and a depiction of the approximate route is included in Map 19.

Comment 4

Jim Hollingsworth
336-384-4240
Citizen of Ashe County

April 9, 2007
 8:30am
 30 minute phone call

Mr. Hollingsworth, a concerned citizen of Ashe County, called in response to the BRNHA Management Plan and Environmental Assessment Notice he read in the Mountain Times. He is especially concerned with the ridge top wind turbines that are proposed in Ashe County and their impact on the environment for the Mt. Rogers Wilderness Area. Issues such as impacted view sheds, proximity to residents and noise pollution are at the forefront of this opposition. Mr. Hollingsworth wanted to know if there was any planning in support of preserving the ridges of Ashe County from Wind turbines in the BRNHA Management Plan work.

PLANNER RESPONSE - The technical consultant thanked Mr. Hollingsworth for his remarks concerning the area and asked him to check with the website to fully understand the scope of the project. She said she would make note of his comments and consider them in the inventory and planning process. The final planning document does not include any statements pro or con about the use of wind turbines. It may arise as a topic of discussion for the Preservation Task Force or other BRNHA committees as concerns about scenic integrity are addressed over time.

Comment 5

Nancy Ellen Ferguson
771 Centennial Road
Union Mills, NC
28167-7903
828.287.3509
 April 16th 2007
 10:45am
 Via phone call

Ms. Ferguson called in reference to the historic resources of the Revolutionary War in Rutherford County. She mentioned the significance of historic assets such as:

- William Gilbert/Gilbertown
- Patrick Ferguson
- Overmountain Victory Trail
- Fort McGahay(sp?)
- Fort McFadden
- Britain Presbyterian Church
- Other Colonial Government Forts

Ms. Ferguson wanted to make certain that the “Official History” is represented in any publication regarding these resources.

PLANNER RESPONSE - *The final planning document incorporates some information in brief on Map 19 and Appendix 1-F about the Rutherford Trace and Overmountain Victory Trail in Rutherford County.*

Comment 6

Date: Tuesday, May 29, 2007 7:23 PM
From: "McWhorter, "Frankie" <fmcwhorter@nccommerce.
To: brnha.info@equinoxenvironmental.com
CC: Penn Dameron" <pdameron@awnc.org>
Subject: Questions/Comments
Attachments: image001.jpg

Just a few questions/comments on the draft.
 Page 85 - Can South Mountain (gamelands) which has access from Rutherford be added to the list for Rutherford?
 Page 105 - Is the 8 miles of Rails to Trails from near the McDowell Line to Spindale eligible to be included under Trails for Rutherford?
 Page 119 - Can Bob's Pocket Wilderness be included under McDowell even if it is in private ownership?
 Page 135 - Add Tryon Arts and Crafts under Polk schools/etc. that teach traditional craft
 Page 143 - Add May Fest and Hilltop Festival under Rutherford festivals that include craft
 Page 151 - Add Dot Lane (Story teller/autoharp) Doug Elliott (Naturalist/story teller) and Robert Wells (traditional musician - bass fiddle) to Rutherford
 Page 161 - WNCW and WCAB belong in the Rutherford list and not in the Polk list
 Page 173 - Add Rutherfordton Farmer's Market under Rutherford
 Page 175 - Add Fortune Melton Farm (NRHP) under Rutherford .

Thank you, Frankie

Frankie L. McWhorter
 Heritage Tourism Development Officer -Rutherford
 Division of Tourism, Film, and Sports Development

North Carolina Department of Commerce

PLANNER RESPONSE - *All of the resources but the Rails to Trails and Bobs Pocket Wilderness suggested for inclusion were added to the final Management Plan.*

Comment 7

Date: Wednesday, May 30, 2007 2:26 PM
From: Paul_Carson@nps.gov
To: brnha.info@equinoxenvironmental.com
CC: c_smith@ncsu.edu
Subject: Comments on Draft BRNHA Plan & EA

After reviewing the Draft BRNHA Management Plan and EA I would like to provide the following comments, relative to references about the Overmountain Victory National Historic Trail (OVNHT) within the document. The OVNHT has the same legal and federal status as the Appalachian National Scenic Trail, yet it is listed in the appendix, while the AT is listed under National Park assets. Given that both are nationally recognized resources and are both administered by the National Park Service it is felt that the OVNHT should be listed under the section identifying NPS resources, and not in a separate appendix. Both trails were created through the same congressional processes and are recognized as such within the NPS. The description of the OVNHT is incorrect in stating that the trail "enjoys an NPS designation and is managed jointly through a multiple party public private partnership." A correct statement would be that the trail is administered by the National Park Service, which has developed various partnerships along the route to assist in the construction, preservation and interpretation of the trail and its resources. The map in the appendices showing the route of the OVNHT shows only counties in western NC and has no line indicating the route. The 220 miles within NC (out of 330 miles total) actually go through nine counties, all of which are within the boundaries of the BRNHA. Currently the OVNHT is in the process of finalizing the first phase of developing a GIS for the trail through an agreement with North Carolina State University. If you would like to have data showing the route you

may contact Ms. Charlyne Smith, Recreation Consultant/GIS Specialist at NCSU at (919) 515-7118. I am copying this message to her as well, so that she is aware of your data needs. If you have any questions regarding these comments or the OVNHT please feel free to contact me at (864) 936-3477. Thank you for the opportunity to provide input regarding the draft document.

Sincerely,
Paul Carson
Superintendent - OVNHT
(864) 936-3477

PLANNER RESPONSE - *Additional information about the Overmountain Victory National Historic Trail is included as requested in the text of Chapter 3 and on Map 19 in the final Management Plan.*

Comment 8

From: "Rita Robinette" <rita@datatechresources.com>
To: brnha.info@equinoxenvironmental.com
CC: Penn Dameron" <pdameron@awnc.org>, "Brenda Coates" <Brenda.Coates@millcenter.org>, "Brandon, "Leesa" <lbrandon@nccommerce.com>, dmagic@craftcreativitydesign.org, "Spence Campbell" <spen150@bellsouth.net>
Subject: BRNHA Management Plan and Environmental Assessment Updates
Date: Thursday, July 12, 2007 4:42 PM

I am a member of the Henderson County Heritage Council. At our meeting in Henderson County yesterday, Leesa Brandon, NC Heritage Development Officer advised us about the Management Plan and Environmental Assessment Updates and asked our group to review them on the BRNHA are website to make sure there were no changes or missing items, etc. After a cursory review, I find there are numerous resources missing from the inventory (listed in the Appendices) for Henderson County. I will sending individual emails based on categories of resources that I am

familiar with. Other individuals in our council will be contacting you to add missing resources, especially those relating to arts and culture in Henderson County. However, please note that we have musicians, storytellers, and artists I know need to be cataloged in our county. And there are numerous history and historic artifact museums that need to be added. Please do not leave our County information out of your listings. However, it will take time to put together the other inventory listings that are missing. Please feel free to contact me if you have any questions regarding the above.

Please add the following two listings to your inventory
Page 33 - Villages, Mounds, and Geological Sites of Cultural Significance

1) Jump Off Rock - Jump Off Rock is a large rock formation providing a scenic overlook which provides a panoramic view of the Blue Ridge and Pisgah mountain ranges. Legend has it that over 300 years ago a young Cherokee Indian maiden received word that her young Indian Chief had been killed in battle, so she climbed to the edge of the rock and jumped off. Legend suggests that on moonlit nights you can see the ghost of the maiden on Jump Off Rock. The attraction is located about 5 miles from downtown Hendersonville at the end of Laurel Park Highway in the Town of Laurel Park.
http://www.historichendersonville.org/jump_off_rock.htm

2) Flat Rock, NC - Landmark for Indians and the pioneer white settlers of this area lies nearby. The Town of Flat Rock named for this natural formation. Located on the west side of Greenville Highway (US-25) at the entrance to the Flat Rock Playhouse. Parking is available. <http://www.waymarking.com/wm/details.aspx?f=1&guid=05b41218-aa6d-40a6-8981-a9d62e881815>
<http://ncmarkers.com/Markers.aspx?sp=map&sv=P-45>

The Cherokee were the first inhabitants of the area in western North Carolina known today as Flat Rock. Named Flat Rock for a massive outcropping of granite found there, it was originally a ceremonial ground and summer campsite of the Cherokee. In 1783 the territory west of the crest of

the Blue Ridge was opened for development by self-reliant frontiersmen and women. The Buncombe Turnpike, constructed between 1824 and 1828, opened up access to the area.

In 1827, plantation owners in South Carolina began to vacation in the region and began constructing their summer estates. The cool and sparsely populated mountains became especially popular among low country gentry wishing to escape the heat, yellow fever, and malaria of the humid South Carolina summers. As a consequence, Flat Rock gained the nickname of “Little Charleston of the Mountains.” In 1827 Charles Baring, a Charleston resident affiliated with the Baring Brothers Banking firm of London, built the first great manor on a 3000-acre estate named “Mountain Lodge.” Shortly thereafter, Judge Mitchell King, also of Charleston, arranged for his summer home, “Argyle,” to be built nearby. The community had a post office as early as 1830. The Civil War significantly weakened the Southern planter class and, as a result, the antebellum era of extravagant dinners, hunting parties, and glamorous balls in Flat Rock came to an end. Flat Rock sits in central Henderson County at an altitude of 2,207 feet. The settlement’s eastern boundary is a plateau on the crest of a Blue Ridge stretching to the west into the French Broad Valley and downstream across the meadows of Mud Creek and Cane Creek. Pulitzer Prize winning poet, biographer, lecturer, and newspaper columnist Carl Sandburg moved to Flat Rock in 1945. During the twenty-two years he lived on his farm, “Connemara,” he wrote over one-third of his life’s works. Today, the Carl Sandburg home is a National Historic Site operated by the National Park Service. Many of the original estate homes are standing today. The oldest section of Flat Rock is included in the National Register of Historic Places. The granite rock for which the area is named can be found on the grounds of the Flat Rock Playhouse.

References:

Sadie Smathers Patton, *A Condensed History of Flat Rock* (1961)
 William S. Powell, *North Carolina Gazetteer* (1968)
 Carl Sandburg Home Website: <http://www.nps.gov/carl/>
 Historic Hendersonville and Historic Village of Flat Rock Website: http://www.historichendersonville.org/history_flat_rock.htm

<http://www.stjohnflatrock.org/stjohn/history.html>

Please add the following to your inventory Page 21 - 23 - Critical Habitat and Significant Natural Areas. There are several items missing in your list compared to the Executive Summary of “An Inventory of the Significant Natural Areas in Henderson County NC (1992).” Please refer to: <http://www.ncnhp.org/Images/Henderson10-03-05.pdf> (NC Natural Heritage Program) for complete listings and details. Again, please call me if you have any questions. Thanks.

Rita D. Robinette
 Data & Technology Resources
 102 Elden Street
 Hendersonville, NC 28791
 828.698.0780

PLANNER RESPONSE - Neither jump off rock nor Flat Rock were confirmed through the technical consultant’s research or by Cherokee representatives on the IDT as important Cherokee sites. Therefore, they have not been added to the heritage resource inventory. The heritage resource inventory included in the final planning document was informed by the most current data available from the NC Natural Heritage Program.

Comment 9

From: “Rita Robinette” <rita@datatechresources.com>
To: brnha.info@equinoxenvironmental.com
CC: “Penn Dameron” <pdameron@awnc.org>, “Brandon, “Leesa” <lbrandon@nccommerce.com>
Subject: More Additions to BRNHA Inventory
Date: Friday, July 13, 2007 6:35 PM

Please add the following two listings to your inventory Page 10 - National Heritage Theme - Major Lakes *Note: I don’t know what size lake is considered significant, but based on the inclusion*

of Lake Summit, I am sending you a complete listing. You can get in-depth details on any one of the following from USGS, including aerial photos, location map, and topographic maps
Source: <http://www.hometownlocator.com/DisplayCountyFeatures.cfm?FeatureType=reservoir&SCFIPS=37089>

Name USGS Map Lat Long

Banks Brothers Lake Horse Shoe 35.3 -82.56
 Banks Lake Horse Shoe 35.29 -82.61
 Beech Lake Fruitland 35.39 -82.46
 Beechwood Lake Fruitland 35.39 -82.46
 Blue Star Upper Lake Standingstone Mountain 35.24 -82.54
 Bonclarken Lake Hendersonville 35.27 -82.43
 Briar Lake Horse Shoe 35.32 -82.5
 Bullseye Orchard Lake Saluda 35.2 -82.35
 Camp Blue Star Lake Number Two Standingstone Mountain 35.25 -82.54
 Crooked Creek Lake Hendersonville 35.28 -82.47
 Echo Lake Horse Shoe 35.31 -82.5
 Forge Mountain Grist Mill Lake Horse Shoe 35.35 -82.62
 Frady Lake Skyland 35.44 -82.52
 Front Lake Hendersonville 35.27 -82.44
 Gore Lake Horse Shoe 35.28 -82.6
 Hendersonville Reservoir Dunsmore Mountain 35.42 -82.68
 Hollaman Lake Skyland 35.4 -82.54
 Holloman Pond Skyland 35.41 -82.54
 Hoopers Creek Lake Fruitland 35.46 -82.41
 Hosea Lake Zirconia 35.22 -82.38
 Innisfree Lake Skyland 35.39 -82.53
 Jeffers Lake Standingstone Mountain 35.23 -82.57
 Jordans Lake Hendersonville 35.27 -82.44
 Jump-Off Mountain Lake Horse Shoe 35.29 -82.61
 Kanuga Lake Horse Shoe 35.26 -82.52
 Kenmure Pond Hendersonville 35.27 -82.46
 Kleine Lake Horse Shoe 35.35 -82.57
 Lake Bonclarken Hendersonville 35.28 -82.43
 Lake Curtis Hendersonville 35.28 -82.38
 Lake Falls Hendersonville 35.26 -82.47
 Lake Hosea Zirconia 35.22 -82.38

Lake Louellen Standingstone Mountain 35.2 -82.56
 Lake McCrady Horse Shoe 35.27 -82.51
 Lake Rugby Horse Shoe 35.36 -82.53
 Lake Shelia Saluda 35.2 -82.37
 Lake Stel Horse Shoe 35.32 -82.52
 Lake Summit Zirconia 35.23 -82.4
 Larry Ball Lake Clifffield Mountain 35.31 -82.37
 Laurel Park Lake Hendersonville 35.31 -82.49
 Lugana Lake Hendersonville 35.33 -82.47
 Lyday Lake Horse Shoe 35.35 -82.62
 Madonna Lake Hendersonville 35.28 -82.44
 McCabe Pond Hendersonville 35.25 -82.45
 McElrath Lake Dunsmore Mountain 35.42 -82.63
 Osceola Lake Hendersonville 35.3 -82.47
 Pegram Lake Clifffield Mountain 35.28 -82.35
 Pierce Lake Pisgah Forest 35.37 -82.64
 R L Parker Lake Horse Shoe 35.29 -82.55
 Rainbow Lake Hendersonville 35.32 -82.49
 Runaway Farm Lake Bat Cave 35.4 -82.33
 Side Lake Hendersonville 35.27 -82.44
 Silver Lake Horse Shoe 35.37 -82.62
 Sky Lake Estates Lake Horse Shoe 35.32 -82.52
 Temple Terrace Lake Hendersonville 35.31 -82.47
 Ton-A-Wanda Lake Hendersonville 35.26 -82.47
 Wolf Lake Hendersonville 35.27 -82.5

PLANNER RESPONSE - Only the largest and most prominent lakes in Western North Carolina were included in the heritage resource inventory for the final planning document.

Please include (compare to existing listings) in inventory Page 12 Trout Streams Source: NC Resources Commission /NC Trout Fishing Map Update http://www.ncwildlife.org/pg03_Fishing/TroutMapUpdate05.pdf. Source: <http://www.wnctrout.com/regs.html#wild>

Henderson County

(Rocky) Broad River (1/2 mile north of Bat Cave to Rutherford County line)
 Green River—upper (mouth of Rock Creek to mouth of Bobs Creek)
 Green River—lower (Lake Summit dam to I-26 bridge)
 Camp Creek (S.R. 1919 to the Polk County line)
 (Big) Hungry River
 Little Hungry River
 Cane Creek (S.R. 1551 bridge to US 25 bridge)
 Clear Creek (S.R. 1591 bridge at Jack Mountain Lane to S.R. 1572)

PLANNER RESPONSE - NC Wildlife Resources Commission trout stream data was used to compile the list of trout streams in the BRNHA. It includes most, if not all, of those listed above by Ms. Robinette.

Please include (compare to existing listings) in Inventory - Page 13 - Public Fishing & Game Lands. Note: Wouldn't trout streams on public lands all be public fishing? Source: NC Resources Commission /NC Trout Fishing Map Update. http://www.ncwildlife.org/pg03_Fishing/TroutMapUpdate05.pdf

PLANNER RESPONSE - Yes, public fishing is available on game lands and at essentially most locations in the national forests. Thank you for this clarification. The heritage resource inventory and Map illustrating public fishing opportunities was intended only to showcase public access areas managed by resource agencies. This clarification is made in the text description about fishing opportunities in Chapter 3.

Regarding Game Lands, NC Wild Life's Guide to NC Game Lands shows Pisgah National Forest as a Game Land and part is located in Henderson County. Source: http://www.ncwildlife.org/pg04_HuntingTrapping/pg4a_guide.pdf. More to follow. Please call me if you have any questions. Thanks.

Rita D. Robinette
 Data & Technology Resources

102 Elden Street
 Hendersonville, NC 28791

PLANNER RESPONSE - The national forests are now depicted in Appendix 1-A and on Map 7 as game lands managed in concert with the NC Wildlife Resources Commission.

Comment 10

From: John Vining
 To: brnha.info@equinoxenvironmental.com
 Subject: BRHA Chap 3 - Comments
 Date: Sunday, November 25, 2007 6:23 PM

Dear Specialists,

I have read over the entire Chapter Three: Heritage Resource Inventory section and want to suggest the inclusion of an additional paragraph. On page 43 you have a Header entitled "Railroads". Contained in that header is some historical information of which there is no mention of the "Saluda Grade". The Saluda Grade is one of the most important features in all of commercial railroading in the United States. The grade at Saluda is 4.7 percent, meaning the tracks rise 4.7 feet for every 100 feet of horizontal travel. Normally a 2 percent grade is considered steep. In 1995 "Trains Magazine" listed the Saluda Grade as one of the 10 most sacred spots (for railroading) in America. Most consider it only second to the Horseshoe Curve route in Pennsylvania in significance. It was the steepest mainline route in the US until it closed in 2001. Since December 2001 the Saluda Grade has been closed to regular freight traffic. If it was ever opened up to tourist traffic, whether it be an excursion train or trail foot traffic, this would be the most significant rails in all of the Blue Ridge National Heritage Area. For that reason I strongly urge you to include a brief paragraph on the Saluda Grade in this section. Thank you for considering my suggestion.

John Vining

Polk County Extension Center
NC Cooperative Extension Service

PLANNER RESPONSE - We believe that the Saluda Grade does merit a brief highlight in the management plan for the reasons given. The description of the Saluda Grade expressed above has been inserted into the final document.

Comment 11

From: Kieran Roe [mailto:kieran@carolinamountain.org]
Sent: Monday, November 26, 2007 1:36 PM
To: andy@equinoxenvironmental.com
Cc: Ed Schwartzmann; Tom Fanslow
Subject: FW: BRNHA Mgmt Plan Comment Period NOW OPEN

Hey Andy,

I'm following up on Leesa's email below. I believe that there should be more green blobs in Transylvania County for NC SNHAs than are showing on your map on p. 55. (http://www.blueridgeheritage.com/resources/images/RobBell/ManagementPlan/HRI_MAPS_1.pdf) Ed Schwartzmann is just now wrapping up work he's done in the last few years on a inventory of the county.

Kieran Roe, Executive Director
Carolina Mountain Land Conservancy
Hendersonville, NC

PLANNER RESPONSE - We called Mr. Schwartzmann and asked about the availability of the new natural heritage data. The timing of its availability in a form that he and the NC Natural Heritage Program were comfortable sharing did not work out with the timing of the construction of the final version of this plan. Therefore it is not included in the final document. Interested persons are encouraged to contact the NC Natural Heritage Program and request this data.

Comment 12

From: "Cece" <conwayec@email.unc.edu>
Sent: Monday, November 26, 2007 12:00 PM
To: brnha.info@equinoxenvironmental.com
Subject: comments on Intro

Shouldn't folklife contribution via Arts Council etc be mentioned under Handmade in helping revise and acquire the initial legislative designation? Can't find Appendix IV. Thanks. More later.

PLANNER RESPONSE - We contacted Ms. Conway to request that she help clarify her question. We received a response but the question remained unresolved.

Comment 13

From: Charlie Jackson" <charlie@asapconnections.org>
Sent: Monday, November 26, 2007 3:34 PM
To: brnha.info@equinoxenvironmental.com
Subject: Management Plan and Assessment

Appalachian Sustainable Agriculture Project has recently published a report on the potential for saving farms through local food production. The full 325 page report is available at <http://asapconnections.org/special/research/index.html>.

Charlie Jackson
Appalachian Sustainable Agriculture Project
phone 828-236-1282

PLANNER RESPONSE - We agree that this economic impact study about agriculture in Western North Carolina is an excellent resource document of which the BRNHA should be aware. Specific reference has been made to that document in the final version of the plan in the chapter on 'Other Planning Initiatives' in the section about agricultural planning.

Comment 14

From: John Vining" <john_vining@ncsu.edu
 Sent: Tuesday, November 27, 2007 10:18 AM
 To: brnha.info@equinoxenvironmental.com
 Cc: John Vining" <john_vining@ncsu.edu>, "McWhorter,
 "Frankie" <fmcwhorter@nccommerce.com>
 Subject: Re: BRHA Chap 2 - Comments

Dear Specialists,

Please accept my apologies for the segmented replies. The manner in which the plan is listed on the web makes it simpler to print out one chapter at a time. In Chapter Two: The BRNHA Management Approach I would like to suggest an addition to Table 2-9 on page 20. Under the Preservation header in the Agricultural Heritage Objectives section please consider a P6 - Identify those crops such as tobacco that played a significant role in the development and economics of the region. Create a permanent display at the BRNHA Headquarters that highlights and documents the historical impact of those commodities to WNC. Thank you for considering the suggestion. Many of the crops are not important to the region today (ie. production of Chestnut lumber). Regardless of that, it is important that we have an accurate historical account of these items for future generations to understand.

John Vining
 Polk County Extension Center
 NC Cooperative Extension Service

PLANNER RESPONSE - *We agree with Mr. Vining that for future generations to understand mountain agricultural traditions, it is important to have an accurate historical account of formerly important agricultural crops and commodities that may not be important today. We considered the suggestion of adding a sixth Preservation objective in table 2-9 associated with archiving and displaying traditional agricultural crops and commodities. We decided against that because we believe that Objectives P-5 and I-1 already*

provide avenues for focusing attention on this issue. Additionally, we feel the specificity of that recommendation is better displayed as a strategy or action. Therefore, the idea has been presented as a strategy or action in table 2-10.

Comment 15

From: John Vining" <john_vining@ncsu.edu
 Sent: Tuesday, November 27, 2007 10:31 AM
 To: brnha.info@equinoxenvironmental.com
 Cc: John Vining" <john_vining@ncsu.edu>, "McWhorter,
 "Frankie" <fmcwhorter@nccommerce.com>
 Subject: Re: BRHA Appendix 1-D Comments

Dear Specialists,

I reviewing Appendix 1-D Music Heritage I spotted a void in the listing for Polk County. The Town of Tryon has a Summer Tracks Concert Series each summer at Rogers Park amphitheater in Tryon. I guess the proper place to list it is on page 269. The Tryon Concert Association also has significant music productions throughout the year at the Tryon Fine Arts Center. I would list it on page 269 as well. The Town of Columbus has gospel sings the entire week before Independence Day. It should be listed as Fabulous 4th Celebration, Town of Columbus. Thank you for considering the recommendation.

John Vining
 Polk County Extension Center
 NC Cooperative Extension Service

PLANNER RESPONSE - *The Heritage Resource Inventory focuses primarily on the 5 heritage themes central to the establishment of the BRNHA. When reviewing music heritage resources for inclusion into the HRI, we made a distinction between traditional Western North Carolina music and music in general. Therefore, music resources that are not primarily associated with 'string band, bluegrass, unaccompanied ballad singing,*

blues, shape note, a capella lined out hymn, or gospel' are not included in the document. Based on these criteria, only the Fabulous 4th Celebration warrants inclusion and it has been added to the HRI appendix.

Comment 7

From: John Vining” <john_vining@ncsu.edu
Sent: Tuesday, November 27, 2007 8:27 PM
To: brnha.info@equinoxenvironmental.com
Cc: John Vining” <john_vining@ncsu.edu>, “McWhorter, “Frankie” <fmcwhorter@nccommerce.com>
Subject: Re: BRHA Plan Page 53

Dear Specialists,

On the Heritage Resource Inventory Maps #4 on page 53 that lists National & State owned forests and parklands there is no mention of the 15,000 acre Green River Gorge Gamelands in Polk & Henderson Counties. The property is owned by the State of North Carolina. It should be included on the map. Thanks

John Vining
 Polk County Extension Center
 NC Cooperative Extension Service

PLANNER RESPONSE - Green River Game Lands are already included on Map 7: Fishing and Hunting Opportunities in the Blue Ridge National Heritage Area.

Comment 16

From: John Vining” <john_vining@ncsu.edu
Sent: Wednesday, November 28, 2007 9:32 AM
To: brnha.info@equinoxenvironmental.com
Cc: John Vining” <john_vining@ncsu.edu>, “McWhorter, “Frankie” <fmcwhorter@nccommerce.com>
Subject: Re: BRHA Chap 5 - Comments

Dear Specialists,

In Chapter Five: Other Planning Initiatives on page 98 there is a mention of major private attractions which includes Chimney Rock Park. Since the state now owns the park you might prefer to insert something like the Nantahala Outdoor Center or Tweetsie Railroad in place of Chimney Rock. Just a suggestion. Again, the plan document is so large I apologize for sending different comments on separate e-mail messages.

John Vining
 Polk County Extension Center
 NC Cooperative Extension Service

PLANNER RESPONSE - We have now substituted Nantahala Outdoor Center and Tweetsie Railroad for Chimney Rock Park as examples of private attractions that undertake their own planning initiatives.

Comment 17

From: Brandon, Leesa [mailto:lbrandon@nccommerce.com]
Sent: Wednesday, November 28, 2007 12:42 PM
To: Penn Dameron; Andy Brown
Subject: questions about BRNHA plan

Hi to you both -

Yesterday when I was at AW I gave a couple of possible typos to Beth - fyi. I've only had a chance to review Ch. 2 - Mgmt Approach. Boy, that's a lot of information! My primary question at this time has to do with the PTF composition chart proposed on page 24 of that section. Can you please explain some of the state agency choices? Maybe they are justified, but based on my experience in the region there are a couple of what seem to me - odd choices. For example: Music - NC Division of Archives & History? I wonder if NC Arts Council - Folklife Division was considered? Agriculture - NC SHPO -Was Coop. Extension or Ag

considered? Both state agencies (SHPO & Archives/History) you recommend do commendable work, but not in the fields you've proposed they represent. Let me know if I'm off base - thanks!

Leesa Sutton Brandon

Heritage Development Officer

North Carolina Department of Commerce
Division of Tourism, Film & Sports Development
31 College Place, Suite 108A
Asheville, NC 28801

PLANNER RESPONSE - the table in Chapter 2 is a 'prospective' list. None of the organizations have been asked to participate as of the construction of the final document. Others may very well be more suitable than those listed in the table. Ms. Brandon's comments about using other state agencies instead of the ones listed in the table are justified. We think the final PTF composition will be up to Penn and the Board.

We do believe that we are justified in our selections for the table however.

1. The NC Arts Council was already accounted for under the Craft Heritage Theme. We didn't want duplicative participation across different themes by the same organization on the PTF.
2. NC State Historic Preservation Office was considered a potential candidate agency for farm preservation because of their work with national register listings, architectural surveys, etc. that can qualify farms and farming communities for national listings and century farm designations. We didn't think the NC Cooperative Extension Service was quite the same fit in a 'Preservation Task Force' because of their typically weightier emphasis on agricultural development (though it is acknowledged that many agents and the organization itself is also concerned with agricultural preservation).

Comment 18

From: "Jerry Stensland" <Jerry.Stensland@rutherfordcountync.gov>

Sent: Wednesday, December 05, 2007 3:42 PM

To: brnha.info@equinoxenvironmental.com" <brnha.info@equinoxenvironmental.com>

Subject: Comments

Hello, just a couple of comments or corrections.

1. In Chapter 3, Page 32 you can delete Hickory Nut Gorge as a state park. Chimney Rock State Park is the name for the entire park in that area, replacing the original name of Hickory Nut Gorge.
2. In Chapter 5, Page 101 for Rutherford County we have a Historical Society and we have a Parks & open space plan so both of those should be a 'Y'
3. Appendix I - Lake Lure is not a recreation only lake, the town has a power plant at the dam.

Thanks!

Jerry Stensland
Recreational, Cultural & Heritage Planner
Rutherford County
141 W. Third St., Rutherfordton, NC 28139

PLANNER RESPONSE - We have made each of the three corrections described above by Mr. Stensland to the final document.

Comment 19

From: Julie Judkins" <jjudkins@appalachiantrail.org>

Sent: Thursday, November 29, 2007 2:48 PM

To: brnha.info@equinoxenvironmental.com" <brnha.info@equinoxenvironmental.com>

Subject: Great Job!

Although I haven't read through all of it, the draft looks fantastic!

Julie Judkins

Resource Program Manager for the Southern Regional Office
160A Zillicoa Street
Asheville, NC 28801

PLANNER RESPONSE - Thank you.

Comment 20

From: Paul Carson
Sent: Monday, December 10, 2007 10:39 AM
To: Victoria@equinoxenvironmental.com
Subject: Comments on BRNHA Plan

December 10, 2007

Ms. Victoria W. Partridge
Equinox Environmental Consultation and Design, Inc.
37 Haywood Street
Suite 100
Asheville, North Carolina 28801

Dear Ms. Partridge:

Thank you for the opportunity to review and comment on the final draft of the Blue Ridge National Heritage Area Management Plan and Environmental Assessment. Overall the document is well organized and quite extensive and references to the Overmountain Victory National Historic Trail (OVNHT) are, for the most part, accurate. After review though several omissions and inaccuracies were noted as regards the trail, so the following corrections are suggested for inclusion in the final draft:

1. On pages 201 to 202 there is a listing by county of “National Parks, Recreational Areas, and Campgrounds.” The OVNHT should be listed under Surry County and deleted from listing under Yadkin County. All else is correct.
2. On pages 233 to 236 there is a listing by county of “Select Recreational Trails.” As with correction #1 the OVNHT should be listed under Surry County and deleted from listing under Yadkin County. All else is correct.

3. On page 255 there is a listing by county of “Museums, Sites and Collections.” Under Mitchell County we would suggest listing the Museum of North Carolina Minerals, which is located near Spruce Pine along the Blue Ridge Parkway. That facility also includes an exhibit about the OVNHT.

4. On page 290 there is a listing by county of “Other Heritage Resources.” Under Mitchell County we would suggest listing the annual Overmountain Men Celebration, which takes place each year on the grounds of the Museum of North Carolina Minerals. The multi-day educational and interpretive event will be celebrating its 17th year in 2008.

5. On pages 291 to 292 there is a listing by county of “Expeditions and Military Campaigns.” The OVNHT should be listed under Surry County and deleted from listing under Yadkin County. All else is correct.

6. On pages 327 to 331 there is a listing by county of “Historical and Cultural Resource Interests.” The “National Park Service” should be listed as a potential partner in this category for the nine counties where associated sites or portions of the primary historic route of the OVNHT have been identified. These include Avery, Burke, Caldwell, McDowell, Mitchell, Polk, Rutherford, Surry, and Wilkes.

We will look forward to seeing the final version of the Blue Ridge National Heritage Management Plan and Environmental Assessment in the near future. The Heritage Area has already proven its worth as a valuable partner for the OVNHT and we look forward to continuing our successful collaboration for many years to come.

If you have any questions regarding these comments please feel free to contact me at (864) 936-3477. Thank you.

Sincerely,

Howard P. Carson
Superintendent

PLANNER RESPONSE - Corrections provided by Mr. Carson in comments 1 - 5 above have been made to the final

planning document. In response to comment #6, the list of potential partners includes only those local and state organizations not explicitly described in the organizational framework presented in Chapter 2 and illustrated in table 2-1. Since the NPS is fundamentally a key partner and its role already described in detail earlier in this plan, we do not feel it is necessary to also list them on pages 327 - 331 in Appendix III: Potential Partners.

Comment 21

From: Holder, Thomas (Tom)

Sent: Mon 12/3/2007 2:58 PM

To: Penn Dameron

Subject: Review Comments - BRNHA Management Plan

Management Plan and Environmental Assessment

General

I have no problem with the Management Plan Alternative selected, which I assume is Alternative E - Management with Goal Integration. This is probably the least politically-risky choice and still allows us to do pretty much what we want. The Preservation Task Force is a good idea and I would hope you would include some local heritage council members. We need to get our locals more directly involved with the organization - I think they feel kind of isolated and left out. I also agree we need to give them more guidance and assistance in developing good projects. As regards tighter focus on projects that relate to the main themes, that's okay - just don't write the guidelines so tightly that they eliminate local creativity. I like your idea of representation by theme area - I think that will strengthen the programs.

Specific

There are a lot of objectives and strategies relating to agriculture. Remember that is the job of the Extension Service and NC Dept of Agriculture. Let's not get too far into general agriculture - let's focus on assisting agritourism enterprises/agriculture

transition and preservation of agricultural heritage sites and traditions. Promoting the farming industry and preserving farmland in general is a broad subject that could soak up a lot of staff time.

Page 53 - Pilot Mountain SP in Surry County is missing from the map

Page 83 - Downtown Elkin was a mustering point for the Western NC militia in the Overmountain Victory battle and might be included as a Site of Importance.

Page 93 - I think High Country Host Direct Impact should be \$466 Million.

Pare 97 - Agriculture - The NC Agritourism Networking Association (ANA) is a statewide group which assists farmers with the transition issue. They work in conjunction with the Extension Service.

Appendices

General

I suspect the locals will find a number of errors and omissions in here. I caught a few - none critical.

Specific

Page 256 - Yadkin County - Old Wilkes/Wilkes Heritage Museum is in Wilkes County. Shore-Styers Mill Nature Park and Heritage Farm is not really about craft heritage - it is about natural and agricultural heritage - it may belong in some other category. They apparently found blueprints of the old mill itself and are considering restoring it.

Page 280 - Surry County - Bethabara, Bethania and Salem are in Forsyth County and should be removed.

Page 283 - Surry County - Horne Creek Living Historical Farm in Surry County belongs in here somewhere under historical sites or agricultural heritage.

Page 310 - Yadkin County - Town of Elkin Parks and Greenways Master Plan belongs under Surry County.

Page 326 - Under Surry County include Surry Arts Council and Yadkin Valley Craft Guild; under Yadkin County include Yadkin County Arts Council

Page 331 - Under Yadkin County, include Preservation Yadkin County (a separate organization).

The above changes are not critical, but the local folks will be happy to know they were made.

Overall

A nice job on a complex subject in a short time. Go for it!

***PLANNER RESPONSE** - Thank you for the compliment. In response to your general comment, we believe that it will be difficult to achieve equitable representation from local councils on the PTF. Even recruiting just one person per council, the PTF would then have 26 additional people, which because of sheer numbers would probably render the PTF inefficient and ineffective. As discussed in the plan itself, one key role of the PTF is to communicate with local heritage councils, so we believe that local heritage council interests should be well considered and represented on the PTF.*

In response to specific comments, Mr. Holder is correct in that there are quite a few management objectives and strategies/action items listed for the agricultural heritage theme. While there is some specificity given to certain strategies and actions, most of them and the objectives are written in a broad context - allowing for more detailed discussions to occur later among BRNHA management, staff, task forces, and Board. The organizational and operational framework established in the plan should provide ample opportunity for Mr. Holder as a Heritage Tourism Officer to participate and voice such views in the BRNHA's policy, strategic planning and process, and program development. See Figure 2-1.

Specific corrections to the document highlighted above have been made. Pilot Mountain State Park has been added to Map 4 in the final document. The High Country Host Direct Impact figure of \$466 Million has been inserted into table

4-6 in the final document. The ANA has been referenced in the agriculture section in the chapter on other planning initiatives in the final document. While downtown Elkin may be an important mustering site for the Overmountain Victory National Historic Trail, our map was and will remain constructed from existing GIS data provided by OVNHT or NPS sources. The Elkin site is not included in those files.

Corrections to the final document have been made for specific comments described above on pages 256 - 331.

Comment 22

From: Virginia Faust

Sent: Monday, December 17, 2007 6:56 PM

To: Andy Brown

Subject: Env Assessment review

Hi Andy,

I received the EA and have read it "lightly" --in other words, not word for word but I did read it up to the point at the end where I say I stopped. I think it looks great! I like the lay-out and graphics. A few things did strike me, and I will pass them along. An overall stylistic comment—it is better to write out "percent" than give the symbol whenever it appears in the written narrative; if it's in a table then the symbol is OK.

- Executive Summary (ES); it states "...the approach presented was not the environmentally preferred option..." This sentence jumped out at me--if it wasn't, then what was? I think you need to be more explicit in the Summary, or go into more detail later and re-word this sentence because it raises a big red flag in my opinion!!
- Still in ES: it reads "This planning document includes a lot of useful reference material." The use of "a lot" seems casual to me; what about "a great deal of" instead.
- Overall, the ES seems too brief--for it to be a real summary I think you need more details so a person reading it would have a flavor of what was discussed in the whole report. You could

have 10-15 pages as a "summary" for such a long document. For example, you could list the four alternatives and give a brief description of each, and then talk about the one that was picked. This would deal w/ my concern in my very first point above.

- p. 19 of PDF, p. 1 of document it reads "Driven primarily by AdvantageWest economic development group..." I think it would read better "Driven by the economic development group AdvantageWest..." or to eliminate saying "group" again in that sentence (since it's used again for HandMade) maybe ask AdvWest if they have a name they use such as agency, organization, etc.
- from now on I'll use the numbering system of "page number of PDF/page number of document" to identify where I'm referring to
- 25/7 The grammar/syntax in this sentence doesn't seem quite right: "One caveat to this statement is that certain member organizations of the Board have in the past and will likely continue to exercise the opportunity to play a dual role as an implementation partner." What about: "One caveat to this statement is that in the past, certain member organizations of the board have exercised the opportunity to play a dual role as an implementation partner, and they are likely to continue doing this in the future." or just further simplify to: "...and are likely to continue doing so in the future."
- 28/10 "Additionally, a concerted effort will be made to use the data from tourism studies to help craft strategies that not only increase tourism but to ensure that investments from tourism help fund important preservation and interpretation goals and objectives." I suggest deleting the "to" right before "ensure that"
- same page: "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." I don't think you need "certain" before "organizations"
- 38/20 Ag Heritage P1 "Help to keep existing farmers who want to farm on the farm" reword to something like "Assist existing farmers to stay on their land who want to continue farming"
- 50/32 "His home and farm, called Connemara, has been preserved by the Nation Park Service and is open to the public for tours and visitation." For subject/verb agreement change to "...called Connemara, have been..."

- 95/77 Map 16, Agricultural Regions, key is missing the symbols that describe the crops Text on 95—under "Agriculture" "farm land" is written as two words but I've only seen it as one word.
- 98/116 Chimney Rock Park is listed as a private attraction, which is no longer the case.
- 101/119 The chart has red/green colors; for people who are color blind, this may make reading/interpreting the table very difficult. Wikipedia states between 7 to 10 percent of men in the U.S. have red/green color blindness.
- 103/121 "Purpose and Need" 1st paragraph "The intention of the EA process..." would sound better "The intent of the..."
- 105/123 I am curious why we don't learn until p. 105 of the document what the names of the alternatives are—I think this information should be given much earlier in the report, why not in the Executive Summary or at the latest in Chapter 2.
- 106/124 Is the plural of "Council of Governments" COGS or COGs? In my mind, COGs seems better (otherwise you would expect the "S" to mean something, which it doesn't). Perhaps you could ask a COG how they do a plural reference?
- 108/126 Under "Cumulative Impact Assessment" "compliment" is used—it should be "complement"
- 109/127 In the chart under "Music Resources" in row right under "Resource Group Assessed in EA" the block states "Important people to music heritage;" would it be better to say "People important to music heritage" ?
- 111/129 Under "Marketing and Promotions Program" there is a listing of the six initiatives; one through five are listed as a group with a brief explanation and then 6) starts off as a new sentence that begins "While..." to me, this is awkward and I would do all six in the same sentence, and then start talking about 6) in a new sentence.
- 112/130 Under Alternative B, Summary there is the acronym PTF and in the () following the initials are listed again, instead of saying what it is first, followed by the acronym in (); at this point I don't know PTF is. 2nd paragraph same page; the sentence reads, "The level of effort would increase...over the next 10 years due the..." the word "to" is missing, should be after "due"

- 113/131 First paragraph on the page, the sentence “Ultimate decisions would remain...” sounds odd to me—better to say “Final decisions...” ?
- 115/133 First paragraph, “The level of effort would increase...over the next 10 years due the...” the word “to” is missing, should be after “due”
- Same page, under Grants Program, Description, “Ultimate decisions would remain...” sounds odd to me—better to say “Final decisions...” ?
- Same page, Marketing and promotions heading, Go Card paragraph, missing “to” in “Preference would be given those...” should be “to those”
- 117/135 Same comment under Grants Program, “Ultimate decisions...”
- 118/136 Sentence “...providing an in-kind contributed service that has substantial monetary value and can be utilized to leverage federal funding...” does it need a “that” after “...monetary value and that can be...” to match style of previous clause? No strong opinion on this point...just an observation/question...
- Same page, sentence “...in particular to answer the question over time of heritage based tourism and development is successfully facilitating...” should it be “...if heritage based tourism...”
- 120/138 This section, “Assumptions in the Analysis Regarding Management Alternatives “ is a good summary—might be helpful in expanded Executive Summary...
- 124/142 3rd para; on page, “The Land of Sky Regional Council developed and has been...” I think “initiated” would be a better word than “developed” in this context. Also, the agency’s name is hyphenated: Land-of-Sky
- Same page, same sentence—actually, LOS received a grant from the Z. Smith Reynolds foundation to examine the issue throughout WNC, not just in the four counties it serves as a council of government—might be a good idea to mention the grant.
- Same page, r-h column, 2nd sentence “... can fragment habitat...” specify kind of habitat—plant and animal? Or just animal?

- 125/143 2nd para; “...no shortage of outstanding natural resource values...” I wonder if use of “values” is best word—“areas” be better?
- Same page, r-h side, 2nd para; “...forefront of BRNHA planning and decision-making...” d-m should be hyphenated.
- Same page, last para; “...outstanding water resources while educating about the role...” the phrase “educating about” sounds odd to me—not sure how I’d fix it.
- 126/144 under Recreational and Scenic Resources, “...in part because so many tourists already recognize...already offered...” “already” used 2x in same sentence, replace 2nd with “now offered” or “currently” ?
- Same page, under “Cumulative Impacts” 2nd para; “In year 2007, combined appropriations...” I think it would be helpful to explain a bit further, “... appropriations to these five agencies totaled...”
- Same page “One NC Naturally is formulating...both of which...some of which...” the two “of which” are repetitive—re-word?
- 127/145 r-h side, “...without mitigative measures in place...” is mitigative a word? Even if it is, less jargon to say mitigating ?
- Same page, under Land Resources “...as a charismatic natural resource feature...” the use of “charismatic” was puzzling—not sure what you were getting at, although as I continued reading I think I understood. Perhaps another word-- iconic? Charismatic also occurs on the next page—same comment.
- 128/146 under Biological Resources “Common wildlife, vegetation...as quickly or as in more pronounced a fashion...” the use of “as in more pronounced” was confusing—better to say “or as in a pronounced...” ?
- Same page, Conclusion, “...as tourists and residents grow in their...” how about instead of “grow” say “residents increase their...” or “residents become more aware of the environment...”
- Same page, “...promotional activities that produce more tourists...” what about instead of produce use “attract” ?
- 129/147 “Cumulative Impacts” 2nd para; “...extraordinary number of organizations region wide...” region-wide needs to be hyphenated.

- Same page “...all teach their members and others of the general public...” what about “their members as well as the general public”
- 130/148 Conclusions “...unless BRNHA is successful partnering with...” I think “in” needs to be added: BRNHA is successful in partnering with...
- Same page, bottom, first sentence under Direct and Indirect Impact Analysis “Alternative E essentially...” to the end is too long I think—can it be divided into two sentences? How about “Alternative E...against adverse impacts. At the same time, Alternative E maintains core heritage...”
- Same page, r-h side, 2nd para; “Many of the adverse impacts...at less intensity due to less emphasis...” substitute “reduced” for second “less” in sentence?
- Same page, “Beneficial impacts... 5) deliberate use...infrastructure projects that should dual...” missing a verb between should and dual? Is it “achieve” or “accomplish” and should there be a “the” after the verb?
- Same page last sentence in that para; “Alternative E would also...manage well expected increases...” This is confusing because when I read it the first time I thought “well” was modifying “expected” but it’s going with “manage” What about dropping the “well” or change it to “better manage”
- 131/149 under Cumulative Impacts, 2nd para; “Beneficial cumulative...continues to exist...” I think the verb agreement should be “continue” since impacts is plural.
- Same page, r-h side, top, should be “short-term” and long-term” -they need hyphens
- Same page, “Using only impacts expected to cultural...” doesn’t sound quite right—is “impacts applicable to...” better/more clear? Or what about “impacts expected to apply to cultural” ?
- 134/152 Alternative B Analysis, same comment as earlier on 130/148 with repetition of “less” in same sentence—change second “less” to reduced?
- 135/153 3rd paragraph decision-making needs a hyphen
- 136/154 r-h side, 1st para; “Even when planned and managed problems may still occur.” I’m not sure it’s clear

- what is being described by “even”—do you mean the events mentioned in the previous sentence? Maybe you should be more specific; at the very least, put a comma after “managed”
- 138/156 top same comment as earlier—repetition of less in the same sentence. “more” also repeats in that sentence.
 - Same page, 1st para; “A danger exists however that...development that BRNHA...” I think “the” should be substituted for “that” in front of BRNHA.
 - Same page, r-h side, “It’s networking...” should be “Its” (possessive, not contraction)
 - 139/157 short-term and long-term need hyphens.
 - Same page, 2nd para; “Using only impacts...identify...” should be “identity”
 - 140/158 r-h side 2nd sentence “Once this condition is met...” I question the use of the word “met”—what about “occurs” as in, once this condition occurs
 - Same page, “Increasing tourists to the region...” what about “Increasing numbers of tourists to the region...”
 - 141/159 under Cumulative Impacts “Depending upon survey...” I think it reads better Depending upon the survey...
 - Same page, “BRNHA’s effort to create more tourists...” should be “attract more tourists”
 - Same page, under Analysis, repeat of comment above, less repeated twice in same sentence
 - 142/160 r-h side, 1st para; “However, without dedicated funding...there would be less opportunity...to apply newfound knowledge and lessons learned and produce outcomes...” as I read and re-read the phrase “knowledge and lessons learned and produce outcomes” I wondered if it should be “lessons learned to produce outcomes...” (doesn’t need to be underlined).
 - 144/162 last para l-h side; repeat of comment above “It’s networking efforts among private foundations” should be “Its”
 - Same page r-h side, 1st para; “...there is some concern...may be given landscape...” might read better “given to landscape...”
 - 146/164 l-h side 1st para; discussion of Status Quo “producing” people—should it be attracting people ? but also the meaning behind the words—I read and re-read this sentence and finally decided perhaps the point is that people who are unfamiliar w/ DOT’s transportation improvement projects

refers to the fact that there will be road construction projects, and people will be coming here who don't realize a road is under construction—is this correct? Also I wasn't sure what the reference to “infrastructure limitations” pertains to. And what is the concern? That if people were better informed about road construction projects and “infrastructure limitations” then they wouldn't come? Or they would come but feel less frustrated because they would know in advance and therefore be less frustrated? I think these points need clarification.

PLANNER RESPONSE - *Most of the comments from Ms. Faust are of an editorial perspective. Some of the editorial changes she suggested have been made. More explanation has been given in the Executive Summary of why the environmentally preferred management approach was not selected as the management approach to guide the BRNHA over the next 10 years. The Executive Summary in the final planning document has been strengthened with more meaningful information.*

Comment 22

From: Carol Price” <cprice@mcdowellnc.org>
Sent: Tuesday, December 18, 2007 4:51 PM
To: brnha.info@equinoxenvironmental.com
Subject: BRNHA Management Plan Comments

Good afternoon,

After reviewing the proposed management plan, I have several additions to contribute for McDowell County. These are attached. Also, I noted in reading the marketing sections, no mention was given to the three marketing host groups that have been a part of the BRNHA process since its implementation. As a board member of the Blue Ridge Mountain Host, I believe these marketing organizations should be included as partners and, in my opinion, be included when consideration is given to new board members or when creating marketing related committees. Also, I strongly believe each county's TDA director or representative should be

included in any planning process. During the past four years, I have repeatedly provided information about McDowell County that is consistently omitted when any type of inventory is taken. These same omitted areas are repeated once again in my attached management plan comments. The TDA directors are the best representatives of their respective areas and are uniquely qualified to not only fairly represent their county but also have accurate knowledge of their county's heritage/cultural/natural resources inventory. We are also the organizers of our local heritage councils. I appreciate your time and please contact me if you have questions or need any additional information.

Best regards,

Carol B. Price
 Executive Director
 McDowell County Tourism Authority
 25 W. Main Street
 Post Office Box 1567
 Old Fort, NC 28762

PLANNER RESPONSE - *There is a great deal of data and information from McDowell County presented in the plan. Some of the comments below appear to be oversights or are inaccurate statements. The neglect of the regional host groups was an oversight in the draft version of the plan and certainly not intentional. The final planning document discusses their value to the BRNHA and their role in future partnerships. The various Tourism Directors for each county in the BRNHA likewise add value to the region.*

McDowell County Omissions:

Geologic Features

Bob's Creek Pocket Wilderness & Pogue Mountain - Listed in the 2005 N.C. Natural Resources Inventory - Page 49 and page 165 listed as a “significant natural heritage area” includes 610 acres

and includes older growth forests that have not been logged for generations. Area includes several endangered plant species, no animal inventory is available but one is being conducted.

Vein Mountain - Gold mines past & present - NC was once the only source of gold to the nation and this area was part of that history. Vein Mountain joins Rutherford County just south of this location where Beckler Mint was located.

Hickory Nut Mountain - In addition to its geological features, this mountain also has historical significance during the Revolutionary War-Era and Civil War-Era

PLANNER RESPONSE - While these are distinctive local features, we do not believe they are prominent enough at the regional landscape scale to warrant inclusion into the map of significant geological features.

Significant Resource Waters

Catawba River - Headwaters & a portion designated trout stream (includes handicap pier)

Curtis Creek - U.S. Forest Recreation Area & Trout Stream

Newberry Creek - “ “ “ “ “ “

Each of these is located on USFS land with public access and are designated as trout waters by the N.C. Wildlife Commission

PLANNER RESPONSE - Each of these are in fact depicted on the map as trout waters.

National and State Parklands

Curtis Creek Recreation Area

Lake James State Park

PLANNER RESPONSE - This map depicts only national and state forests and park lands. Lake James State Park is featured on the map. Curtis Creek Recreation Area is a feature within the Pisgah National Forest in McDowell County. The national forest is shown. Curtis Creek Campground is also listed in the Appendix 1 on National Forests, Recreation Areas and Campgrounds.

Critical Habitat

Plants - 11 federally listed species in the 2005 N.C. Natural Heritage Inventory

Animals - 9 federally listed species “ “ “ “ “

PLANNER RESPONSE - The map of critical habitat and rare species in fact does document McDowell County occurrences. Endangered, Threatened & Federal Species of Concern known in McDowell County are listed in the Appendix on Critical Habitat and Plants and Animals of Conservation Significance.

Fishing & Hunting Opportunities

These are listed in the N.C. Wildlife Resources Commission Digest Hunting - South Mountains Gameland

PLANNER RESPONSE - South Mountains Gamelands is in fact depicted on the Map.

Public Fishing

Catawba River (Catawba Falls Campground to Old Fort Recreation Park

Little Buck Creek (game land portion)

North Fork Catawba River (headwaters to North Cove School at S.R. 1569 bridge)

Armstrong Creek (Cato Holler lower line downstream to Greenlee upper line)

Mill Creek (upper railroad bridge to U.S. 70 bridge)

Catawba River - Headwaters & a portion designated trout stream (includes handicap pier)

Curtis Creek - U.S. Forest Recreation Area & Trout Stream

Newberry Creek - “ “ “ “ “ “

Lake James - Public boat access areas are also outlined in the NCWRC Digest

Recreational Trails

Armstrong Creek - 3640 Ft./6 mile trail. Primitive hiking on Armstrong Fish Hatchery Rd. Trail begins past hatchery parking lot. Easy -moderate. (Pisgah Forest)

Bad Fork - 2940 Ft. /8 Miles. Primitive trail connects Woods Mountain & Armstrong Creek Trails. NC 226-A to Armstrong Fish Hatchery Rd. 3 miles to trail head on left. Moderate (Pisgah Forest)

Betsy Ridge - 3160 Ft./9 Mile Trail. Black Mountains view, meets Little Buck Creek Trail ending at Woods Mountain Trail. US 221 North, left on Tom’s Creek Road. Right onto first dirt road, head is second road on left. Easy -Moderate (Pisgah Forest)

Kitsuma Peak - Short hike, 20 minute trail. Breathtaking views and unusual Carolina hemlocks. Take I-40 west to Ridgecrest exit. Turn onto Old U.S. 70, road is blocked. Park at road end. (Pisgah Forest)

Lead Mine Gap - Mixed forest environment with long range views. Highway 70 to Curtis Creek Road, east of Old Fort. Trailhead approximately 8.5 miles. Trail ends at Hickory Branch Trail, after 2 miles trail rejoins Curtis Creek Road at lower point. 5 miles, moderate hike. (Pisgah Forest)

Little Buck Creek - Excellent views of Marion, Lake Tahoma and Black Mountain range. From U.S. 70, west of Marion, turn right onto NC Highway 80, passing Lake Tahoma on right. Cross bridge over Buck Creek, turn right onto dirt road. Take left at first intersection and go 1.5 miles to trailhead (turnout with USFS sign and gate). Distance 5.8 miles, moderate to strenuous. (Pisgah Forest)

Mackey Mountain - This trail is located in a bear sanctuary. Take appropriate precautions on trail. Spectacular views. U.S. 70, east of Old Fort to Curtis Creek road, turning left. Trailhead is 9 miles at entrance of Sugar Cove Road. Distance 16 miles, moderate to strenuous hike. (Pisgah Forest)

Mountains to the Sea Trail - Two segments of this 700 mile route are in McDowell County. The Craggy Pinnacle segment follows the Blue Ridge Parkway from Asheville past Buck Creek Gap at NC 80 to Little Switzerland. The route includes a 14 mile steep downhill grade. The Brown Mountains Light segment continues

on the Parkway to Linville Falls at the northern tip of McDowell County and onto the foothills area via NC 181. Route includes several gentle descents and easy climbs. (Pisgah Forest)

Newberry Creek - 4300 Ft/5 Miles. Scenic trail ends at Blue Ridge Parkway. Take US 70 West to Curtis Creek turning right. Left at Newberry Creek Road (FS 482-A). Go 4 miles to end & trailhead begins at end of road. Easy -moderate. (Pisgah Forest)

Overmountain Victory National Historic Trail - Historic trail covering four states and 300 miles runs through McDowell County between Lake James and the Blue Ridge Parkway. There are 57 accessible miles of trail. Begin on the Blue Ridge Parkway at the North Carolina Mineral Museum, Milepost 331. Trailhead begins across NC 226 from the parking lot. Head North on trail parallel to Parkway. Cross Parkway and follow dirt/gravel road past Orchard at Altapass to McKinney Gap. Cross under Parkway and enter wooded trail to Heffner Gap parking lot on Parkway. Go to www.nps.gov/ovvi for more trail information and access details. (Pisgah Forest)

Woodlawn Fitness Trail - Fitness trail consists of seven stations, 2 exercises per station on a 1/4 mile jogging path. Additional one mile loop surrounds exercise trail. Woodlawn Work Center is six miles north of Marion on U.S. 221. Trail is behind picnic area on left. 1.25 miles, easy to moderate.

Woods Mountain - Outstanding views of Black Mountain range, Little Switzerland and Armstrong Creek watershed areas with views of Table Rock from section of North Carolina’s “Mountains to Sea” trail. Begins near Buck Creek Gap overlook at intersection of Blue Ridge Parkway and NC 80. Trail may be exited on U.S. 221 at U.S. Forest Service Area rest area near Woodlawn. 13 miles, moderate to strenuous. (Pisgah Forest)

Young’s Ridge - Begins in Old Fort at picnic area. Incredible views of Kitsuma Peak at trail’s end. U.S. 70, west of Old Fort onto Mill Creek, turn right. Old Fort Picnic Area is several miles on left and marked by National Forest Sign. 7 miles, easy to moderate. (Pisgah Forest)

Waterfall Hiking Trails:

Catawba Falls - Headwaters of the Catawba River and protected by conservation easements, this 340 foot cascade includes

an upper and lower falls with an upper 70 foot plunge. Exit I-40, #73, turn left, travel under interstate and take an immediate right turn. At fork, bear left onto Catawba River Road (behind McDonald's) and go 3 miles to road's end. Park on gravel shoulder on left. Moderate hike to lower falls, strenuous hike to upper falls, 3 miles. (Pisgah Forest)
Hickory Branch Trail Falls - Views of 20 foot waterfall can be seen from this trail at U.S. Forest Service campground, Curtis Creek Recreation Area. Approximately 2 miles east of Old Fort take U.S. 70 to Curtis Creek Road, turn left. Go 4 miles to campground, trailhead is on edge of field to right of campground. 4 mile round trip, moderate. (Pisgah Forest)
Tom's Creek Falls - 7 miles north of Marion on U.S. 221, turn left onto Huskins Branch Road, just before Woodlawn Motel. Go 1.5 miles and park on right at gravel lot before small bridge. Trailhead begins at lot. Trail will fork, follow left creek. Gentle falls in picturesque area. Fall height is approximately 100 feet. 2 mile, easy loop. (Pisgah Forest)

PLANNER RESPONSE - Due to budget and timing issues, it is not feasible or practical to list every hiking trail or fishing area in each county in the BRNHA.

Music Institutions

Orchard at Altapass - Traditional Music - Free to the Public

PLANNER RESPONSE - Live music at the Orchard at Altapass is listed in the Appendix about music and jam sessions and is accounted for in the 'banjo' graphic depicting 2 jam sessions in McDowell County. It is not an 'institution' and therefore does not warrant a star in the map.

Socio Economic Development

Chapter 4 - Land Area Changes: Page 88
 - Catawba River Basin is excluded.

PLANNER RESPONSE - As stated in the text, only a select number of river basins for which

data was available was utilized to develop this analysis. Unfortunately, the Catawba basin was one of those for which data was unavailable.

Chapter 5 - Other Planning Initiatives: Page 101
 - McDowell does have a Historical Society, DAR Chapter, Sons of the Confederacy - Emma Rankin Chapter and an architectural survey has been completed.

PLANNER RESPONSE - Corrections have been made to table 5-1 in the final planning document as indicated above.

Appendix II - Local Recreational Planning Initiatives: Page 309 - McDowell County does have Parks & Recreation Plan and has adopted a Master Greenway Plan. City of Marion has Parks & Recreation Plan, Greenway Plan, & Infrastructure Plan

PLANNER RESPONSE - Corrections to the final planning document have been made as indicated by Ms Price.

Comment 23

From: Phyllis Stiles [mailto:phyllis@blueridgeforever.info]

Sent: Friday, December 21, 2007 11:08 AM

To: Andy Brown

Cc: Carl Silverstein; Paul Carlson; Susie Hamrick-Jones; George Santucci; Margaret Newbold;

teresa@highcountryconservancy.org;

kieran@carolinamountain.org; hillshepherd@skybest.com;

hitrust@earthlink.net; Maggie Clancy; 'mhorak@tnc.org';

Justin Boner; Sally Walker; James Coman; Kristy Urquhart

Subject: Comments on the Blue Ridge National Heritage Area Management Plan from Blue Ridge Forever

Comments on the Blue Ridge National Heritage Area Management Plan from Blue Ridge Forever, A Coalition of the Thirteen Land Conservation Organizations Serving Western North Carolina. Blue Ridge Forever Coalition Members: Blue Ridge Rural Land Trust, Carolina Mountain Land Conservancy, Conservation Trust

for North Carolina, Foothills Conservancy of North Carolina, High Country Conservancy, Highlands-Cashiers Land Trust, Land Trust for the Little Tennessee, National Committee for the New River, Pacolet Area Conservancy, Southern Appalachian Highlands Conservancy, Trust for Public Land, NC Chapter of The Nature Conservancy (National Advisory Member) The Conservation Fund (National Advisory Member).

The Blue Ridge National Heritage Area has made terrific strides in facilitating a region-wide discussion on the significance of our natural and cultural heritage in a few short years. The BRNHA staff are to be commended on engaging so many disparate groups in this dialogue resulting in much greater self-awareness and reverence for the NC mountains within and outside our treasured region. Likewise, it is clear that you and the Interdisciplinary Team (IDT) have put a great deal of effort in aggregating relevant and accurate data to formulate the BRNHA management plan. The Natural Heritage and Agricultural Heritage maps and lists in the appendices are outstanding and we are struck by the thorough way in which you have analyzed the data to arrive at a recommended management approach. Thank you for taking this process so seriously. You have done Western North Carolina a huge service and we believe it would be worthwhile to publish and distribute the final document.

Land Trusts as Partners

With our missions so aligned and the fact that we serve exactly the same counties with the exception of two (BRNHA serves Surry and Yadkin and BRF serves Alexander and Catawba), we are very excited about what BRNHA has accomplished to date and the potential for even greater positive impact to come. We could not find the summary of our partners’ land protection work we shared with you. Did you decide not to include it after all?

PLANNER RESPONSE - *There is an enormous amount of data displayed in the plan and utilized to craft and analyze the various management approaches. We did not display a summary of existing land protection work by*

the land trust community for a variety of reasons. First, it would not affect in any substantive way the different components of the plan or the management alternatives explored in the Environmental Assessment. Second, it would not affect in any substantive way the enhanced role of the land trust community we feel that the plan clearly and forcefully identifies. We felt that adding the data on existing land protection work would essentially be adding data for data’s sake and the plan is already very lengthy. We do feel however that this information should be made available in the future in detailed discussions undertaken by the Preservation Task Force.

We are grateful to see land trusts are mentioned so many times and that you recommend the formation of a Preservation Task Force (pages 23-24) to include representative(s) from the WNC land trust community. We believe such a task force could be very influential in maintaining a healthy balance between BRNHA’s work on economic development and preservation. WNC land trusts welcome the opportunity to partner with BRNHA to play a more strategic regional role in preservation. As you indicated numerous efforts are underway to help counties plan ahead and allocate resources for land protection. As the report lays out, to date BRNHA has focused mostly on tourism product development and tourism marketing, but not preservation of natural resources or farmland—two of the five heritage themes for which WNC was designated a national heritage area. We are pleased to see that BRNHA wishes to correct that imbalance. It was also reassuring to have BRNHA acknowledge the potential negative impact of promoting more tourism on page 9: “The Preservation Task Force 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.” To counter this threat, we urge BRNHA to consider engaging the Eco-Realtors and The Green Building Association and others in making

WNC a showplace for green building alternatives with a message that bigger is NOT always better. “Green/sustainability tourism,” as well as “eco-tourism,” could be a tourist attraction in its own right.

In addition to the role of land trusts in the natural and farmland heritage themes, it is worth noting that land trusts (especially Land Trust for the Little Tennessee) have already been and will continue to be interested in the Cherokee and Craft heritage themes as well--“conserving the natural resource base used in traditional handcrafts” (page 16) and “protecting [Cherokee] sites, artifacts, and traditions” (page 14).

Management Approach Chosen

As you so eloquently state in the Executive Summary, “The intent of this management approach is to stimulate economic activity in the region using heritage resources but without compromising the qualities of those resources that make the region so distinctive.” A little later, you state, “While the approach presented is not the environmentally preferred option, it would be next in terms of its ability to produce environmental benefits with minimal environmental disruptions.”

In the words of Baba Dioum: “In the end we will conserve only what we love. We will love only what we understand. We will understand only what we have been taught.” As you state on page 121, “Beneficial impacts could result if the increasing number of tourists and residents, because of their experiences with these natural resources, become stewards or advocates of natural resources and their protection.”

With that said, we encourage BRNHA to spend its resources on interpretation and product development which teach understanding of and respect for our Southern Blue Ridge environment. This honors the research you funded in 2006 that “found that enjoying the scenery of the area and participating in outdoor recreational activities were the primary activities engaged in by 57% of tourists visiting the area in 2006.” (Page 93) This approach will not only draw higher dollar tourists but

also will help to sustain our fragile environment. In that spirit, we highly encourage “use of the I-Wall or a nearby informational kiosk to promote heritage preservation” (page 113).

As you have opted to go with Alternative E, we are confused by the unenthusiastic summary statement on page 153: “Alternative E, management with goal integration, produces no overall adverse impacts and only 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. This is not a glamorous management approach. Very little is risked and significant gains for the Heritage Area could only be expected after years of methodical execution of management intent.” If this is the case, why is this the chosen alternative? Perhaps this paragraph could be reworded.

PLANNER RESPONSE - We believe the region will be best served using a management approach that attempts to balance development and preservation. While a focus on one of the three primary goals would likely produce more substantial and charismatic benefits directly related to that goal, we felt that constituencies and heritage needs related to the other goals would be somewhat neglected. Alternative E seeks to treat the three heritage goals and constituencies in the most equitable manner possible while still stressing pursuit and achievement of meaningful goals and objectives.

Raising Funds from NC Trust Funds

We ask that BRNHA not spend its resources on raising funds from the NC Trusts Funds. WNC land trusts and others have been very successful with accessing those funds for many years. The reality is that the Trust Funds are only able to fund as little as 25% of the proposals they receive now. Our hope is that BRNHA exercise its influence with the General Assembly and others to increase funding and its influence with local governments to

allocate funds for conservation to match state and federal funds. Such advocacy possibilities are endless: the Transfer Tax votes scheduled for Fall 2008 offer an excellent possibility for new dedicated revenue streams that are directly tied to the loss of natural and open spaces, and Tourism Development Authorities might be influenced to do marketing that emphasizes our reverence for the environment and to make grants to further that cause.

PLANNER RESPONSE - *BRNHA, by statute, cannot engage in political advocacy. It also cannot acquire interest in land. It is our desire to partner with the land trust community and other heritage preservation constituencies to develop excellent heritage preservation projects, and utilization of State of NC Trust Fund dollars should factor into the equation of how to bring such projects to fruition. The BRNHA has no intentions of seeking Trust Fund dollars to support its operations. Specific fundraising details per project would be discussed and decided upon through the PTF established by this plan.*

On page 159, you state, “The BRNHA does not want to be in the business of competing with the very people it is trying to help for the same sources of financial support.” We feel you have a very important role to play in assisting organizations that: (1) do not have the staff capacity either to write proposals or to manage large grants, (2) to win regional, multi-organization grants, or (3) to provide the requisite matching funds. Rather than soliciting grants from NC Trust Funds, we encourage you to follow the model of Carolina Mountain Land Conservancy who applied for a successful grant to supply 12 AmeriCorps volunteers to 12 conservation organizations. CMLC managed this complex multi-year project, a valued service to the organizations who benefited. AmeriCorps prefers to work with fewer organizations and have a greater impact in this way. Similarly, the National Endowment for the Humanities, and to a lesser degree, the National Endowment for the Arts have numerous funding tracks of interest to BRNHA and its partners; however, their proposals are extremely involved. Perhaps, there are opportunities for BRNHA to write and manage

grants from the NEH and NEA that would benefit multiple organizations. VISTA volunteers might be ideal for removing invasive species. These are just a few examples of joint fundraising opportunities but we believe there are probably others (Golden LEAF Foundation, Appalachian Regional Commission, Tennessee Valley Authority, NC Rural Center, NC Biotechnology Center...).

PLANNER RESPONSE - *These are all excellent ideas that should be discussed in detail by the PTF soon to be established by this management plan. Generally speaking the BRNHA does not plan, on its own, to solicit grants from the various NC trust funds. Trust fund dollars would typically be sought by partnerships in which the BRNHA was involved. BRNHA may be the grantee or another organization may be deemed by the partnership as the most appropriate grantee. The trust funds are accounted for by the BRNHA in this plan on table 8-3 as funds that have been leveraged in support of heritage preservation, development, and interpretation at least in part because of BRNHA involvement in key project. Please note the sentence in section VIII.C under the description about grants. We quote ‘The BRNHA will also more effectively network with State of NC trust funds and private foundations to help cultivate matching grants in support of local implementation partners’ heritage preservation projects’.*

Research Program

We are also very excited about the proposed Research Program. We would like to help you develop the “Top 10 List of Endangered [Natural] Heritage Resources in Western North Carolina.” (Page 10) By necessity, land trusts must spend their time protecting specific parcels of land before it is too late. This involves long hours and often years of relationship building, negotiations with landowners, and fundraising to purchase the land or development rights, leaving little time for the kind of research you describe. For example, we were struck by the Management Plan’s lack of data on the rate of development in WNC. This is information we

dearly wish we had. As an alternative, there are actually a couple of good reports on population trends that might be mentioned in your management plan to bring home the urgency of protecting our natural and farmland assets: the recent USFS report showing the dramatic encroachment on the boundaries of US Forest Service land in WNC-- <http://www.fs.fed.us/openspace>, and two reports about the rise of housing density released earlier this year--_ Environment North Carolina Research and Policy Center. April 2007. Losing Our Natural Heritage: Development and Open Space Loss in North Carolina (www.environmentNorthCarolina.org <<http://www.environmentNorthCarolina.org>> <<http://www.environmentNorthCarolina.org>>)and Conservation Trust for North Carolina. From Rural to Suburban in Less Than a Century: Changes in Housing Density in North Carolina. (www.ctnc.org). Furthermore, it would be enlightening to include summaries of numerous “Cost of Services” studies that show that farmland yields greater revenues to counties than residential developments when the costs of ongoing services are weighed against the tax revenues gained.

PLANNER RESPONSE - *As stated in the introduction to Chapter Four: The Socio-Economic Environment of the BRNHA, ‘time and budgetary constraints preclude this plan from documenting more than major macro-trends affecting the region as a whole and at the county and tribal level’. Choices had to be made in the development of this plan as to data to seek and include. We do not disagree that there are additional sources of data that could help the plan describe the rate of growth and development in the region. However we feel that the information presented about population trends, county building patterns, and land cover change adequately illustrate the points that needed to be made on these socio-economic indicators. In fact, this data was relied upon to a large degree in the analysis of environmental impacts and the development of the EA conclusions and recommendations for the plan. We encourage utilization by*

PTF members of the studies referenced above by Ms. Stiles as they acquaint themselves with their role over the coming years in helping to preserve important heritage resources.

Specific Feedback on Text

Page 22—“Assist in the development and training of the next generation of crafters, musicians, and farmers.” Why not add: naturalists, preservationists, and folklorists?

PLANNER RESPONSE - *Naturalists and folklorists have been added to the list of strategies and actions. They are a reflection of the heritage themes for which BRNHA is concerned. We did not add ‘preservationists’ because we felt that was too broad of a category. Additionally, because the selected management approach attempts to equitably represent all three heritage goals, we felt that if we added ‘preservationists’ we must also add developers and educators. Assisting in the development and training of the next generation of preservationists, developers, and educators would be an activity that by itself could demand all of the attention of BRNHA over the next 10 years.*

Page 31—If Blue Ridge Parkway receives highest visitation at 20 million, how do the Smoky Mountains receive highest visitation at 9 million?

PLANNER RESPONSE - *The GSMNP receives the highest visitation among national PARKS. That park is different from the national park UNIT that is the Blue Ridge Parkway. This is a technicality that was made clear to us by the NPS during the formulation of this plan.*

Page 110, 2nd column: “By default, there is incongruity between management intent and what is actually done and the heritage development goal receives the brunt of attention.” Did you mean to say, “...the heritage preservation goal receives the brunt of attention”?

PLANNER RESPONSE - For greater clarity, the use of the word ‘brunt’ has been removed from that sentence. Otherwise, the sentence questioned remains. It is intended to state that while management intent under the status quo is supposed to fulfill all heritage goals in a fairly equitable manner, in reality heritage development has received more attention. It was through the environmental analysis that this condition really came to light.

Page 115, Grants Program: “The remaining 40% of grant funding would be allocated among heritage development and interpretation projects.” Did you mean, “...among heritage development and preservation projects”?

PLANNER RESPONSE - Yes. The sentence in the final planning document now reads ‘The remaining 40% of grant funding would be allocated among heritage development and preservation projects.’

Page 129, Cumulative Impact: Shouldn’t the “two” state universities be the “three” state universities?

PLANNER RESPONSE - Yes. Reference is now made in the final planning document to the ‘three’ state universities.

Table 2-9, P5: Shouldn’t Western NC “music” be “agriculture”?

PLANNER RESPONSE - Yes. Correction has been made in the final planning document.

There are a few grammatical inconsistencies and errors you may want to correct:

- Ø Scots-Irish/Scotch-Irish/Scots Irish/Scottish
- Ø Allegheny/Alleghany County

Ø Page 32, State Parks: Remove “s” from “Chimney Rock State Parks.

Ø Page 38, Craft Heritage Resources: Remove “s” from John C. Campbell Folks School

PLANNER RESPONSE - We have reconciled these inconsistencies and errors.

Thank you for the outstanding work you did in pulling this plan together. Please let us know if there is anything else we may do to help.

Phyllis Stiles, Campaign Director
Blue Ridge Forever
34 Wall Street, Suite 802A
Asheville, NC 28801

Comment 24

From: Phil Trew [mailto:ptrew@regiond.org]
Sent: Friday, December 21, 2007 11:20 AM
To: Andy Brown
Subject: EA comments

Andy:

Here are my comments (by page # as they are on the printed draft):

1. p.xi (Executive Summary) - 2nd paragraph. 4th sentence is awkward

PLANNER RESPONSE - Executive Summary has been substantially re-written for the final planning document, which should have resolved the awkward sentence.

2. p.xiii (Acronyms) - nothing for “CVB” - I have no answer.

PLANNER RESPONSE - CVB has been removed from the list of acronyms in the final planning document.

3. p.61 (map 8) - very little of the OVT is actually off-road hiking trail. Most is a motor route. As far as I know they have 2-3 sections of trail of about 2 miles each. Paul Carson can provide specifics. His # is 864-936-3477.

PLANNER RESPONSE - *The GIS data depicting the location of the Overmountain Victory Trail on Map 8 is intended to become a walking route when the trail is finally completed.*

4. p.77 (Map 16) - I don't know how you determined the regions, but there may be a significant amount of tobacco grown in Watauga, concentrated in the Valle Crucis /Sugar Grove area (based on discussions, not on research)

PLANNER RESPONSE - *Map 16 is intended to represent in a very broad context the main agricultural crops in various regions. While Valle Crucis/Sugar Grove does have its share of burley tobacco farming, Watauga County in general produces much less tobacco than Madison, Yancey, and Buncombe.*

5. p.91 (Table 4-5) - 2006 unemployment rates are available from NC employment Security Commission's website

PLANNER RESPONSE - *The more recent 2006 unemployment data has now been inserted in place of the 2004 data.*

6. p.101 (Table 5-1), p.295 (appendix 2) - Ashe County recently began development of a land-use plan. Commissioners formed a working group, they've met, so it is legitimate.

PLANNER RESPONSE - *Corrections have been made in the final planning document.*

Sorry I didn't have more comments. Thanks for the opportunity. Let me know if you need clarification on any of my comments.

Phillip Trew, AICP
Director of Planning and Development
High Country Council of Governments
P.O. Box 1820
Boone, NC 28607

Comment 25

From: Parkslands@aol.com (Ken Fitch)

Sent: Sat 12/22/2007 11:46 PM

To: victoria@equinoxenvironmental.com

Subject: Re: BRNHA Management Plan and EA COMMENTS

Dear Victoria:

Thank you for your assistance in gaining access to the EA for the Blue Ridge National Heritage Area, a situation which has been a chronic problem. As we discussed, it was continually frustrating not to be able to access the documents online, so I thank you for sending me sections of the EA to review. Unfortunately, given the time limits and the pending deadline, it is impossible to adequately deal with the many serious issues here, and I regret not being able to access the entire document. I have tried to offer some comments nevertheless, perhaps not fully documented or refined, but offered, and I appreciate your efforts to make that possible.

As is readily evident, Western North Carolina is most deserving of a National Heritage Area designation with its rich history of human occupation, natural wonders, and the unique interaction of the people with their environment that has contributed to a wonderful rich cultural tradition that is revealed in many forms. Thus, the Federal recognition formalizes an understanding that exists nationally and globally, bringing large numbers of visitors from around the country and the world. However, unfortunately, the discovery of this part of the country has also attracted a frenzy of development and consumptive abuse of the resources of the area, threatening to destroy many of the qualities that make the region unique and also impact the native populations that have contributed to the unique culture. Thus, a framework that recognizes the unique resources and culture, and celebrates and acts to preserve it for future generations is most appropriate and welcome.

Given the realities that confront this area, and the negative impacts that are currently in invasion mode, a framework that

works to protect and preserve those values and resources for future generations in ways that are sustaining and renewable is needed. Clearly, Alternative B is the only Alternative that responsibly addresses the issues. Without the approach presented in this Alternative, much of what is valued in this region may quickly disappear. Much of what seems proposed and documented here coincides with the efforts across the region in preservation and conservation, thus the BRNHA would function to empower those who are engaged in these efforts across the region.

Significantly, the mission and goals and prescriptions are consistent and correspond to those of the National Park service and other federal entities. AND REMEMBER THIS IS AN ENTITY OF THE NATIONAL PARK SERVICE! (Some elements of the other alternatives verge in a very different direction)

At first, one is very reassured by some of the analysis I have been able to see here, which represents a considerable upgrade in realistic engagement with the importance of the designation and the resources that commend a national designation. Particular note must be made of the ITF which includes some very distinguished persons with grounded information about the area and common sense and integrity. These are the kind of people that represent a wide perspective appropriate for the enterprise, and it does seem that they may have made some impact. THEN, one is quite alarmed when, despite all the information accumulated, the disastrous judgment is stated that “We believe that Alternative E, the management approach.....satisfactorily addresses these issues.” One is further disheartened when one is overwhelmed with the sense that this Alternative is primarily concerned with its own bureaucratic perpetuation. “to help BRNHA as an organization sustain itself over time.” Statements to this effect appear repeatedly. There are many coded statements that really seem to indicate a desire to perpetuate the status quo (in which significant resources are threatened) indeed it even goes to the point of stating “a desired outcome would be complimentary of the Status Quo intentions to use marketing and promotions in pursuit of economic development goals.” Marketing easily and quickly becomes the dominant

and often co-opted public activity, sometimes at contradictory purposes to any preservation modality. The programs seem aimed to perpetuate the organization, the bureaucracy, not the resources. This is, simply, BAD, and elicits the kind of cynicism about the entire enterprise that is not productive or beneficial.

PLANNER RESPONSE - We believe that there are significant benefits that BRNHA brings to the preservation, interpretation, and development of heritage resources of Western North Carolina. Without an acknowledgement of this value and the formulation of strategies designed to sustain and perpetuate the BRNHA as an organization over time, these benefits would be few and temporary. This management plan is intended to facilitate conditions that will support effective management of heritage resources in Western North Carolina over the long term, which means that some attention must be given to how BRNHA plans to sustain itself.

“This management approach would help stimulate economic development in the region...” In this perspective as we have seen all too often, the rush is toward a world in which the landscape is window dressing for commercial and high-end condo developments, and the crafts and cultural artifacts serve as items for interior decoration. What we value as basic to the life of a people, representing their lives and interactions with the place they live are now offered as amenities to those who would invade and displace them (from their farms or historic homesteads). (In this “development” framework, the developers after savaging the environment, then offer to create greenways and parks, such as the Alternative suggests). This also raises the oft-stated observation that too often the “partners” solicited for these tourism and planning ventures are those who have contributed most strongly to the destruction of the values and environment this designation is meant to celebrate.

PLANNER RESPONSE - *We believe that the formation of a Preservation Task Force and its substantial role in strategic planning and decisionmaking at the organizational level and its importance in helping cultivate good heritage preservation projects with local implementation partners balances heritage preservation with heritage development. The BRNHA was authorized by the US Congress to also stimulate heritage resource development and economic benefits in the region. With this in mind, the heritage development goal will still continue to be stressed by the BRNHA.*

I have often stated the flaw (perhaps fatal) in the listing of heritage themes or categories of the omission of history and historic sites. The history here is bound up in the geography and the natural resources, and the interaction has proven illuminating to generations. In some sections there is an acknowledgment of this factor, yes, as it does figure in cultural considerations. When one speaks of “heritage,” for many in this region, it means their connection to the area, to the land through generations, found in the cemeteries that dot the landscape, the fields, the churches and the buildings and homesteads. Of course when you officially ignore history, then this connection can be easily severed and the long time residents can be separated from their lands, as seen in the aggressive maneuvers by developers to pressure farmers and old time residents to sell their land to invading manipulators who make offers that cannot be refused. It should be noted that this phenomenon is in contradiction to the National Heritage Area program understandings. (Somewhere in the NPS literature it does state the importance of keeping people in the place where they have created the heritage and culture). It is stated that sacred sites to the Cherokee might be preserved and encouraged, but I did not detect mention of sites “sacred” to others. There is mention of the crafts and the music created, but not the native architecture...that is also a craft....

PLANNER RESPONSE - *The heritage resource inventory was bounded by a focus on the 5 heritage resource themes. If*

there is a direct association between an historical site and one of the heritage themes, it may receive attention from BRNHA. Certainly, there are a substantial number of historical sites in the region that don't have a direct association with natural, Cherokee, craft, music, and agricultural heritage. By investing efforts on heritage resources as identified in the plan, we are striving to remain true to our authorizing legislation. Additionally, we are striving to have a positive impact in the region and we believe our effectiveness would be diminished if we were to invest time, effort, and finances on developing, preserving, or interpreting heritage resources that have no direct relationship with the five heritage resource themes.

One wishes one could go on at length and in detail, but time and the circumstances do not permit at this time, BUT I do thank you for responding and offering some assistance. This has not always been the case during the process in the past. PLEASE, please do not countenance the outrageous, irresponsible maneuver as proposed in Alternative E. Alternative B is the only acceptable Alternative to address the resources and culture of this remarkable and treasured area.

PLANNER RESPONSE - *We struggled with our decision to select Alternative E as the management approach to guide BRNHA efforts over the next 10 years. Indeed, we agree that there were very good reasons for selecting Alternative B (the environmentally preferred approach). However, we felt that Alternative B did not provide enough emphasis on the heritage development and interpretation goals. Alternative E still maintains a powerful preservation ethic but does place more equitable attention on the heritage development goal. Development is encouraged in a more sustainable manner than either the Status Quo or Alternative D, with greater emphasis on planning, infrastructure, avoidance and mitigation.*

Thank you.

Ken Fitch
1046 Patton Street
Hendersonville, NC 28792

Comment 26

From: "John Vining" <john_vining@ncsu.edu>
 Sent: Friday, December 21, 2007 4:33 PM
 To: brnha.info@equinoxenvironmental.com
 CC: "McWhorter, Frankie, Kipp McIntyre, John Vining
 "McWhorter, "Frankie" <fmcwhorter@nccommerce.com>, "Kipp McIntyre" <kmcintyre@polknc.org>, "John Vining" <john_vining@ncsu.edu>
 Subject: Comments - BRNHA Plan

Specialists,

On page 180 under Polk County in the Appendix you should have listed:

Tryon Peak - 3,231 feet
 White Oak Mountain - 3,102 feet
 Wildcat Spur - 3,239

PLANNER RESPONSE - While these are certainly notable local landmarks, we do not believe these to be 'regionally' defining landmarks. Therefore, they have not been included in the Appendix.

On page 191 under Polk County in the Appendix you should have listed under Outstanding Resource Waters:

Broad River
 Green River
 Pacolet River
 Walnut Creek
 White Oak Creek

PLANNER RESPONSE - These are not Outstanding Resource Waters as designated by NC Division of Water Quality and therefore are not included in the Appendix.

On page 206 under Polk County in the Appendix you should have listed under Significant Known Waterfalls:

Little Bradley Falls
 Big Bradley Falls
 Melrose Falls

Pacolet Falls
 Pearson's Falls (it is spelled incorrectly in the current draft)
 Shunkawauken Falls
PLANNER RESPONSE - The waterfalls have been included in the final document.

Thanks for including this data.

John Vining
 Polk County Extension Center
 NC Cooperative Extension Service

Comment 27

From: Jennifer Cathey [mailto:jennifer.cathey@ncmail.net]
 Sent: Saturday, December 22, 2007 6:16 PM
 To: Andy Brown
 Subject: BRNHA document comments

Andy: I've attached my comments for the BRNHA draft. You all have done a beautiful job of putting this together. Content, formatting, maps and illustrations are uniformly very good. Best of luck in making the final touches -- Jennifer

Jennifer Cathey
 Restoration Specialist
 State Historic Preservation Office
 Archives & History Western Office - Asheville

My opinions may not be those of my agency. E-mail to and from me, in connection with the transaction of public business, is subject to the North Carolina Public Records Law and may be disclosed to third parties.

*** = changes strongly suggested in order to correct terminology, provide complete and accurate information, etc. Other comments are more in the realm of suggestions and copy editing.

Page Xi, paragraph 1, sentence 1

“...is composed of” is awkward wording, and an awkward way to begin the document. How about :
 “The Blue Ridge National Heritage Area is a geographic region spanning the North Carolina mountains. The area is unified by unique cultural and natural features and shared Cherokee, craft, music, and agricultural heritage.”

Page Xi, paragraph 2. Too much use of “this.” Change some this to the.

Line 3 “...support the other...”. “goals such that they support the others.” (more than one goal)

Line 16 “**While the approach presented...**” Very unclear. Needs to explain more clearly why one management approach was chosen over the others. “... it would be next in terms of its’ ability to produce...” especially unclear.

Line 23 “**Significant gains...**” “Management intent” is a very fuzzy term. How about “...as years of methodical execution of the management plan unfold over time...”

page XV; line 4. strike “either”

line 5 change or to and, change lead to led

Chapter 1 and 2 introduction, purpose, organization, and management texts are excellent! This will be a good reference for everybody doing heritage work within the region.

Page 2 line (c)i. Change property to properties

Page 4, paragraph 3, line 5 “IDT members are acknowledged...”. IDT members are listed in a table 6-1, not also in the Appendix? Change this sentence to refer to the table?

Page 5, paragraph 2, line 1 “Chapter 2 is essentially...”. Change to “Chapter 2 contains...”

Page 5, paragraph 4, line 2-3* “It’s long and complicated...” Essentially true, but perhaps too informal and irreverent of a statement for the EA/management plan. Heck yeah, those involved with the heritage area should be familiar with the content of this document!!!

Pages 12 - 22, Tables 2-1 through 2-11 I may have missed the boat during the planning process last summer, but I feel the need to make sure that historic structures are explicitly included in the goals and objectives. Perhaps the term “sites” is broad enough to encompass buildings and structures... but like I said, I want to be explicit in order to promote identification and preservation of historic buildings and structures along with sites and landscapes:

***Tables 2-3 and 2-4. Change all references (approx. 5 in both tables) from “sites, artifacts” to “sites, structures, and artifacts.”

PLANNER RESPONSE - When historic buildings and structures have a direct correlation to one of the heritage themes, they will merit consideration in BRNHA activities and management. Otherwise, historic preservation in general is not mentioned as a defining feature of the authorizing legislation and is therefore not a focus for the BRNHA. We believe that sites and artifacts encompass ‘structures’ and the BRNHA will exercise its management in a manner that is consistent with that belief.

***Table 2-9

Add objective P6: “Identify and protect historic and culturally significant sites and structures associated with agricultural heritage.”

Agricultural buildings such as barns, corncribs, fruithouses, stone walls, etc., are vulnerable cultural resources in addition to/aside from the cultural and natural resource of agricultural land!

PLANNER RESPONSE - *We agree. Tables 2-9 and 2-10 have been changed to reflect the need to support surveys and protection of historically and culturally significant agricultural sites and structures.*

***Table 2-10. Change “Support re-survey and national historic designation of century farms” to “support survey, identification, and preservation of Century Farms and other sites and structures associated with agricultural heritage” As well explained later in the document, the Century Farm program (capitalize this - it’s a program) is specific to farms that have been in continuous ownership by a family for 100 years. It does not necessarily relate to historic structures. So, we need to differentiate between and promote both continuity in farming families, and preservation of historic farm buildings.

Change “support voluntary measures to protect agricultural land, natural areas...” to “support voluntary measures to protect agricultural land, buildings and sites, natural areas...”

***Page 24, Table 2-12

Add NC Archives & History Western Office to “at Large” line. The office is the western branch of the NC Department of Cultural Resources, of which the State Historic Preservation Office, Office of State Archaeology, etc., is a part.

PLANNER RESPONSE - *The ‘At Large’ membership of the Preservation Task Force is reserved solely for federal resource agencies with significant responsibilities in the region. State agencies such as mentioned above are represented for the heritage themes to which they have an association. The table was inserted into the document to provide a prospective list of organizations from which BRNHA could choose to develop its PTF. Final decisions about PTF membership will be up to the BRNHA Executive Director and Board.*

Page 26, paragraph 2, “BRNHA decision makers can have;” “they can reference...”. Change “can” to “may.”

Page 26, number 1. Use of “essentially” weakens the statement. Change to “Any resource considered...”

Page 26, paragraph 2, “tourism, and Daniel Boone...” Change to “tourism, and associations with Daniel Boone.”

Page 35, paragraph 2, line 1. Change from “The Cherokee... believe they have always been here” to something like “Unlike many modern day residents of the area, the Cherokee are native to the region, and believe that their ancestors in fact originated from the Southern Appalachians.

Page 35, paragraph 3, line 1. Technically, members of the *Western Cherokee* are also descendants of people from the NC mountains. (One could be Cherokee by blood though not enrolled in the Eastern Band or other Federally recognized Cherokee groups.) Omit sentence one because this idea is already established in the previous paragraph.

Page 36, paragraph 3. Change “different counties” to “and in surrounding areas”

Page 40, heading. Change “Important People to” to “People Important to”

Page 42, paragraph 3

*** Suggested working for this paragraph:

There are currently over 220 historic farms and Century Farms located within the BRNHA. “Historic” farms are those that are listed in the National Register of Historic Places, which is the nation’s official list of buildings, structures, objects, sites, and districts worthy of preservation for their significance in American history, architecture, archaeology, and culture. Though the National Register is a federal program, nominations are submitted through the North Carolina State Historic Preservation Office.

Properties associated with farming that are listed in or may be eligible for listing in the National Register may include farmhouses, barns and outbuildings, fields, fences, warehouses, and other sites associated with storage, processing, and sale of agricultural goods. The Century Farm program is administrated by the state's Department of Agriculture, and commemorates families that have continuously owned or operated a farm for 100 years or more. Both programs recognize the cultural value and rich tradition of farming within the BRNHA region. In addition to historic structures and family heritage, these sites often feature high quality soils worthy of conservation. National Register and Century Farms are listed in Appendix 1-E and are depicted in Map 18. Not included in this inventory, but worthy of consideration in planning, are properties which have received Local Landmark status from municipal or county government within the BRNHA region. Information about Landmark properties may be obtained from local government.

***This paragraph contains a weblink for the Century Farm program. I suggest omitting it - why include this link when there are countless other programs listed within the text that also have web presences. ***

Century Farm and National Register require capitalization throughout the document.

Page 42, photo. Is this Hickory Nut Gap, or Hickory Nut Gap Farm? (The Ager's farm?)

Page 43, paragraph 1. I did grow up in a part of the Blue Ridge known as "Little Scotland," but I have to protest the statement of legend about Scots-Irish settling in a place that looked like their homeland. Settlement patterns are much more complex than that. (Many had been in Northern Ireland for a generation or more. If they were looking for the Scottish hills, why did so many Scots keep moving out to Arkansas, Texas, and California? What about the many Highland Scots in the Sandhills of SC & NC?) Anyway, how about adding "Although legend has it that they chose to settle in this region because of its resemblance to

the Scottish Highlands..., it was more likely the cession of Indian lands and subsequent opening of the trans-Appalachian frontier that fueled the migration of Scots-Irish into the mountain region during the late eighteenth and early nineteenth centuries."

Page 43, paragraph 3. Wording here can be clarified to differentiate between trails/paths and campaigns. How about this: "Since the colonial era, the WNC mountains have been the location of four military campaigns that shaped local, regional, and national history. Three of these expeditions are known by their routes—the Overmountain Victory Trail, the Rutherford Trace, and the Trail of Tears. The fourth campaign, known as Stoneman's Raid, is summarized below..."

*****Page 44, paragraph 1** Change "would likely qualify for national historic listing" to "are historic and architectural artifacts of this important historical trend."

Page 44, paragraph 2. "Stole the hearts" is way too sentimental. How about "the landscape... became the home of many Scots-Irish immigrants"

Page 67, map 11. Should the Southern Highland Handcraft guild appear in Asheville?

Page 71, map 13. Love the banjos.

***Page 79, map 17. Change legend to "Agricultural Communities represented in the National Register as of 2007 or included as Land Trust Priorities" *Whole communities are rarely NR listed, though communities may be represented in the NR by historic districts or individual properties.*

Change legend to "Counties that contain Voluntary Agricultural Preservation Districts"

***Page 81, map 18. Change legend to "Farms listed in the National Register of Historic Places as of 2007"

Page 96 paragraph 1 under “Cultural and Historical Resources”
 Change 1st part of paragraph to “The North Carolina Department of Cultural Resources has a statewide mission to preserve history and culture, and to recognize and promote cultural resources as an essential element of the state’s economic and social well being. An umbrella organization for many arts and culture agencies, the Department includes the Office of Archives and History and the Office of Arts and Libraries. Within these offices, various divisions undertake work in the areas of historic sites and museums, historic preservation, archaeology, archives and records, and historical publications. Organizations such as the North Carolina Arts Council, Office of State Archaeology, State Historic Preservation Office, and Archives and Historic Western Office in Asheville will likely be most closely allied with BRNHA undertakings. Preservation North Carolina...” keep rest of paragraph.

***Page 96 paragraph 1 under “Cherokee Heritage”.
 Capitalize T in “Tribal Historic Preservation Office.”
 These offices are professionally known as THPOs.

Page 101, table 5-1
 I understand you have space constraints, but the heading under “Cultural” needs to say “architectural surveys” - preferably “historic architectural surveys”

Under the “historic architectural survey” column, Watauga should say “Y.” All counties listed as N, except for Wilkes, should say “reconnaissance” or “recon” (Except for Wilkes, very county has had some architectural survey conducted - only Wilkes should say N.)

First 3 slots for Qualla should read N, Y, N.

Change “nationally listed Farms” to “Farms listed in National Register”

***Page 168 under “Cultural Heritage & Historic” heading. List State Historic Preservation office webpage: <http://www.hpo.dcr.state.nc.us/>

Page 174. Thanks for adding the disclaimer!

Page 243. Oconaluftee, not Oconuluftee.

Page 284. Kituwah is in Swain County, not on Qualla.

***Page 329. WCU’s Mountain Heritage Center may have a broader scope than just Jackson County. Director Suzanne McDowell could tell you. Likewise, the Archives and History Western Office (a branch office of the NC Department of Cultural Resources, where I am located) works with historical and cultural matters across the region. We have a 25-county service region roughly the same as BRNHA.

Page 301

Pretty difficult to read this page. All NCSHPO, NCOSA, NCCDI, CPF, NCAC, and HMA entries are the same across the board - can this be altered like this:

NCOSA: Statewide Comprehensive Archaeological Resource Plan implemented in all counties.
NCAC Long Range Plan implemented in all counties.Etc.

***Change all appearances of “NCSHPO: Comprehensive Statewide Historic Preservation Plan” to “NCSHPO Legacy: Statewide Historic Preservation Plan”

***Entries for historic architectural surveys are incomplete or require changes. Please add or correct the following information:

we have 3 types or levels of historic architectural surveys: comprehensive, reconnaissance, and partial

alleglhany: change to “Countywide comprehensive-level historic architectural survey”

ashe: change to “Countywide comprehensive-level historic architectural survey”; delete (CD)

avery: add “Countywide reconnaissance-level historic architectural survey”
 buncombe: add “Asheville comp comprehensive-level historic architectural survey (CD)”
 burke: add “Morganton comprehensive-level historic architectural survey”
 Caldwell: add “Countywide reconnaissance-level historic architectural survey”
 Cherokee: change to “Countywide comprehensive-level historic architectural survey”
 Clay: add “Countywide reconnaissance-level historic architectural survey”
 Graham: add “Countywide reconnaissance-level historic architectural survey”
 Haywood: change to “Countywide comprehensive-level historic architectural survey”; add: “Canton comprehensive-level historic architectural survey”; “Waynesville comprehensive-level historic architectural survey”
 Henderson: change to “countywide comprehensive-level historic architectural survey”; add “Flat Rock comprehensive-level historic architectural survey”; add “Hendersonville comprehensive-level historic architectural survey”
 Jackson: change to “countywide comprehensive-level historic architectural survey”; delete (CD)
 Macon: change to “countywide comprehensive-level historic architectural survey”; add “Highlands comprehensive-level historic architectural survey”
 Madison: change to “partial countywide historic architectural survey”; delete (CD)
 Mcdowell: add “countywide comprehensive-level historic architectural survey”; add “Downtown Marion comprehensive-level historic architectural survey”
 Mitchell: add “countywide reconnaissance-level historic architectural survey”
 Polk: change to “Tryon comprehensive-level historic architectural survey”; add (P); add “countywide comprehensive-level historic architectural survey”
 Rutherford: change to “countywide comprehensive-level historic architectural survey”

Surry: change to “countywide comprehensive-level historic architectural survey”
 Swain: change to “countywide reconnaissance-level historic architectural survey”
 Transyl: change to “countywide comprehensive-level historic architectural survey”
 Watauga: add “countywide comprehensive-level historic architectural survey (P)”
 Wilkes: add “Wilkesboro, North Wilkesboro, and Trap Hill comprehensive-level historic architectural surveys”
 Yadkin: change to “countywide comprehensive-level historic architectural survey”
 Yancey: change to “countywide comprehensive-level historic architectural survey”
 (whew, that’s done)

page 327

Buncombe: change 1st entry to “Asheville-Buncombe County Historic Resources Commission”

Macon: add: Land Trust for the Little Tennessee (due to they’re involvement with interpretation of West’s Mill area, Cowee Mound, & Rickman Store); change “Macon County Historical Society” to “Historical Society and Museum”

PLANNER RESPONSE - Editorial comments given above have been reviewed and changes made to the text at a number of places where we felt that the suggested change would help clarify content. Corrections to previously mistaken content or factual inaccuracies have been made throughout the text as indicated in the comments.

Comment 28

From: Elly Wells [mailto:elly@ellywells.com]

Sent: Friday, December 21, 2007 10:04 AM

To: andy@equinoxenvironmental.com

Cc: Penn Dameron

Subject: BRNHA Management Plan

Hi Andy -

Attached is a letter from BRMH's Board of Directors and me that serves as our comment to the Heritage Area's Management Plan that was put forth for public comment. I've also attached our current board roster for your information. Thanks for your work on the project and your interest in our comments. I'm cc'ing Penn here so he'll have the same information.

Elly

December 20, 2007

Andy Brown
Equinox Environmental
37 Haywood St.
Asheville, NC 28801

Dear Andy,

Please accept this letter as Blue Ridge Mountain Host's official comment to the Management Plan of the Blue Ridge National Heritage Area (BRNHA.) Blue Ridge Mountain Host (BRMH) is a 10-county public/private partnership promoting the region consisting of Buncombe, Burke, Henderson, Madison, McDowell, Mitchell, Polk, Rutherford, Transylvania and Yancey Counties as a visitor destination. Our 200-member organization is lead by Managing Director Elly Wells and a wonderfully engaged 26-member board (roster attached) of tourism officers from each of the counties, plus representatives from public and private tourism-oriented businesses and organizations throughout the region. We support, and have a vested interest in, the ongoing work of the BRNHA.

We understand that we are a natural and intended partner of the BRNHA and the following illustrates some of our current, tangible contributions to that partnership:

- BRMH includes the BRNHA logo on every print ad that we place. In 2007, that was a total of 23 placements in publications ranging from Southern Living to Frommer's Budget Travel.
- The BRNHA logo and link are on our home page (www.ncblueridge.com) and the BRNHA is the only organization given such placement: one-click-away status on our site.
- BRMH promotes the BRNHA in the 100,000 copies of our annual guidebook with a 2/3 page ad.
- BRMH promotes the BRNHA Blue Ridge Go Card with a complimentary membership listing on our web site.
- When the BRNHA was establishing its web site and a digital database was requested in order to assist in populating that site, our organization provided it. When BRNHA sought partners for its Blue Ridge Go Card, we met with their sales associate on the project and provided a list of targeted leads to assist in the card's development.
- So, after reviewing the BRNHA Management Plan, and especially those sections pertaining to promotion of the area, it was troubling to see that no mention was made of BRMH (or the other two mountain host groups) as ongoing partners. A stated objective in the original BRNHA study mentioned that the "product can be strengthened and promoted by the established marketing organizations in the region"; this statement presumably included the host groups. However this document for moving BRNHA forward does not seem to involve the host groups, who together represent over 700 businesses and organizations that we feel certain are an integral part of the Heritage Area planning. We see this omission, as well as the lack of representation by the host groups on the BRNHA Board of Directors as a weakness in an initiative that we otherwise support.

Via this letter, we ask:

- How can this plan change to include the host groups?
- What could an active and reciprocal partnership between BRNHA and the host groups look like?
- We would like to be acknowledged as ongoing partners of BRNHA, have formalized planning for that partnership, and to have an active seat at the BRNHA table.

If you would like to speak to someone regarding this letter, please contact Elly at 285-9907 or info@ncblueridge.com. Thank you for your consideration.

Respectfully,

Elly Wells
Jennifer Hampton (for the entire board)
Managing Director
President, Blue Ridge Mountain Host

Encl: Blue Ridge Mountain Host 07/08 Board Roster
Cc: Penn Dameron

PLANNER RESPONSE - *This issue has been raised with the Executive Director and some changes to the plan have been made that acknowledge the importance and value of the BRNHA relationship with the three Host Groups. The Host Groups are now acknowledged in the final planning document in the partner framework graphic depicted in Figure 2-1 and in the discussion of partnerships in Chapter 7. The lack of acknowledgement of these critical partners in early drafts was an unintentional oversight of which we truly apologize. As stated by the Executive Director in a separate personal response to the Host Groups, 'Throughout the process of putting the draft Management Plan together, it has always been a basic assumption that the Host groups would be among our most important partners. That assumption has been so fundamental that it has often been unspoken.' That was largely the reason the proper acknowledgements were not made in earlier drafts.*

Comment 29
From: John S. Salmon [mailto:jssalmon@comcast.net]
Sent: Friday, December 07, 2007 2:42 PM
To: Almond, Helen Ruth
Subject: Re: Stonemans Raid in NC

Dear Helen Ruth,

I think your understanding of the route of Stoneman's Raid is the same as ours: passed through Boone and then along the river to Jonesville and beyond. Stoneman did split his force, but I don't believe that Ashe or Alleghany Counties were affected. There were some Unionist-Confederate clashes in those counties, though--but they don't seem to have been a part of Stoneman's Raid. My principal source for all this is John C. Inscoe's and Gordon B. McKinney's *The Heart of Confederate Appalachia: Western North Carolina in the Civil War*. There's a sketch map of the route on p. 246. I also used Ina W. Van Noppen's *Stoneman's Last Raid*. Please don't hesitate to call on me if there's anything else I can do to help you.

Best regards,

John

----- Original Message -----

From: Almond, Helen Ruth
To: jssalmon@comcast.net
Cc: twatts@nccommerce.com ; pdameron@awnc.org
Sent: Friday, December 07, 2007 9:23 AM
Subject: Stonemans Raid in NC

John...Teresa Watts suggested that I contact you about a question regarding the NC route of Stoneman's Raid. I work with Teresa, and also am assisting the staff of the Blue Ridge National Heritage Area as they put together their management plan for the NPS.

I am currently reviewing the BRNHA Management Plan, specifically I'm looking at a map of the "Historic Military Campaigns" in western NC. I did not think that Stoneman's Raid came up through Ashe and Alleghany Counties in NC. I thought that the primary route in NWNC came down through TN into Boone, then continued down into Wilkes County and along the Yadkin River. Can you verify this for me?

Many thanks,
Helen Ruth

Helen Ruth Almond
Tourism Development Officer
Division of Tourism, Film & Sports Development
NC Department of Commerce
150 Government Circle, Suite 3000
Jefferson, NC 28640

PLANNER RESPONSE - Correction to the map depicting the route of Stoneman's raid as suggested by Mr. Salmon and Ms Almond has been made to the map in the final planning document.

