

L76 (CUVA)

October 2, 2002

Mr. Joseph Gates, Project Manager
Army Corps of Engineers
Louisville District
P. O. Box 59
Louisville, KY 40201-0059

Reference: CELRL-PM-M

Dear Mr. Gates:

The purpose of this letter is to express the opposition of Cuyahoga Valley National Park (CVNP) to the United States Army Reserve's plans for the development of an 22-acre administrative and training facility to be located in Boston Heights, Ohio.

As a matter of orientation, Cuyahoga Valley National Park encompasses ~33,000 acres along 22 miles of the Cuyahoga River between the cities of Akron and Cleveland providing outdoor recreation opportunities to millions of Americans in a setting rich in cultural and natural heritage. Since its creation by Congress in 1974, there has been a substantial public investment in the park – more than \$185,000,000 – for land acquisition, habitat restoration, historic preservation, and development of visitor amenities and recreational facilities. The planned facility is located approximately ½ mile from the eastern boundary of the park, and, it follows that the National Park Service (NPS), like many other neighbors to the proposed Army Reserve Center, is concerned about possible impacts to park resources, visitor safety, and public enjoyment of the park. We feel it is inconsistent with our goal of promoting land uses on neighboring lands which are compatible with the park.

As a result of our review of the project – as provided in the U.S. Army Corps of Engineers Environmental Assessment and Finding of No Significant Impact, several concerns have emerged that underlie our current opposition to the project:

- Since the park's creation 27 years ago, the NPS has worked with the 15 communities included within the park to support land uses that maximize the preservation of open space and promote low density uses. Like many communities adjacent to the park, Boston Heights is proud of its identity as a rural community and as an important gateway to the national park. They have invested considerable energy in the past to rebuff development plans that are not in keeping with this character, and continue to study and revise their zoning ordinance in order to preserve the community's character while allowing for compatible development. We believe that, because of the required forest clearing and the facility's density of

development, the planned facility is not in keeping with the rural character of the Village and is not an appropriate gateway to the national park.

- A recurring issue for the park, as large development projects are proposed close to our boundary, is increased traffic along park roadways, especially truck traffic. The NPS is concerned that this facility, with its anticipated peak usage on weekends, could result in increased traffic through the park during busy park use periods, thereby potentially impacting both visitor safety and enjoyment. Boston Heights also shares these concerns because of the number of pedestrians and bicyclists using village roads for general recreation and for access to the national park.
- The NPS is also concerned about the impact of additional federal ownership of land within Boston Heights and the community's concerns regarding the loss of taxable lands. As a matter of information, the amount of taxable land within Boston Heights has been considerably reduced as a result of land in public and non-profit ownership. For example, between non-profit and federal land acquisitions, virtually all land in Boston Heights inside the boundary of the park (approximately 1,475 acres) have already been removed from the tax roles. This alone accounts for more than a 30% reduction in tax-generating parcels within the Village. Removing an additional 22-acres of land from tax roles is expected to further impact the Village's ability to provide basic community services.

We regret that we did not have the opportunity to inform the Army Reserve of our concerns at an earlier date. However, we were not consulted in the development stage of this proposal or during the preparation of the environmental assessment. We only became aware of the project after the FONSI was issued, and then, only through media reports.

We appreciate the Army Reserve's consideration of these concerns, and, we would appreciate being kept apprised of any developments regarding this facility. If you would like to discuss the issues of this letter further, please call me at (440) 546-5903.

Sincerely Yours:

John P. Debo, Jr.
Superintendent

CC Senator Mike DeWine
 Senator George Voinovich
 Congressman Ralph Regula
 Congressman Steve LaTourette
 Congressman Tom Sawyer
 Congresswoman Stephanie Tubbs Jones
 Congressman Sherrod Brown
 Congressman Dennis Kucinich
 Mayor Raymond McFall