



5.0 THE PLANNING PROCESS



5.0 THE PLANNING PROCESS: CONSULTATION AND COORDINATION

5.1 HISTORY OF PUBLIC INVOLVEMENT

The planning process began with the selection of a consultant team to prepare the Management Plan and Environmental Impact Statement (EIS) for the Schuylkill River Valley National Heritage Area in September 2001. A seven-person Steering Committee comprised of representatives of key heritage area partners was responsible for consultant selection and for guiding preparation of the Management Plan. In addition to the Steering Committee, a Task Force comprised of 23 citizens and officials broadly representative of heritage interests within the Schuylkill River Valley was formed to provide input at key points in the planning process. The project officially began in December 2001 with a kickoff meeting of the Steering Committee. Steering committee meetings have been held consistently throughout the planning process since the kickoff meeting. At every stage of the process, documents were available and comments solicited through a special Management Plan and EIS section of the SRGA website (www.schuylkillriver.org). Other components of the public involvement program are summarized below.

1. Scoping (February to May 2002)

Public involvement and project scoping began with interviews of approximately 40 stakeholders in early 2002. Stakeholders included representatives of economic development agencies; environmental and historic preservation organizations; heritage area sites and attractions; and federal, state, and local governments. In conjunction with these stakeholder interviews, an initial set of public meetings were held in March 2002 in Philadelphia, Pottstown, and Pottsville. At these meetings, the consultant team gave an overview of the Schuylkill River Valley National Heritage Area and received input on the key heritage resources in the area, issues that should be addressed by the Management Plan, and how the heritage area could benefit local communities and the region. In April of 2002, the Schuylkill River Valley National Heritage Area Task Force met to review and discuss the results of the public meetings. The scoping process culminated with preparation of a Scoping Report in May 2002.

2. Plan Development (June to October 2002)

Following the March public meetings, the Steering Committee and consultant teams worked to develop a draft set of primary interpretive themes for the heritage area. A second Task Force meeting was



convened in June 2002 to discuss the primary interpretive heritage area themes under development for the Management Plan and to prepare for development of Plan Alternatives. The Task Force Meeting was followed by a second series of public meetings conducted in Philadelphia, Pottstown, and Pottsville in September 2002 to present and obtain feedback on the primary interpretive themes and the Plan Alternatives. In October 2002 the Task Force met again to discuss the results of the September public meetings and to set the stage for preparation of the Draft Management Plan and EIS.

3. Preparation and Public Review of Draft Plan (November 2002 to May 2003)

Preparation of the Draft Management Plan and EIS was completed in February 2002. The Notice of Availability of the Draft EIS was published in the Federal Register on March 21, 2003. A third and final series of public meetings was conducted in Philadelphia, Pottstown, and Pottsville from April 22 to 24, 2003 to present and receive public comment on the Draft Management Plan and EIS. The public comment period on the Draft EIS concluded on May 20, 2003, after which the Final Management Plan and EIS were prepared. The Final EIS includes responses to comments and questions received during the public review period (see Section 5.8 below).

5.2 AGENCIES AND ORGANIZATIONS CONSULTED

The following is a list of agencies and organizations consulted during development of the Management Plan and EIS.

Federal Agencies

- National Park Service
- Hopewell Furnace National Historic Site
- Valley Forge National Historical Park

State Agencies

- French Creek State Park
- Pennsylvania Department of Environmental Protection
- Pennsylvania Department of Conservation & Natural Resources
- Pennsylvania Historical and Museum Commission

Berks County

- Berks County Planning Commission
- Berks County Parks and Recreation Department
- Reading-Berks Convention and Visitors Bureau
- Hamburg Borough Manager
- Hamburg Borough Council



Chester County

- Chester County Heritage Preservation
- Chester County Economic Development Corporation
- Chester County Conference and Visitors Bureau
- Phoenixville Area Chamber of Commerce
- East Vincent Township
- North Coventry Township

Montgomery County

- Montgomery County Deputy Chief Operating Officer
- Montgomery County Planning Commission
- Pottstown Economic Development Director
- Valley Forge Convention and Visitors Bureau

Philadelphia County

- Philadelphia Convention and Visitors Bureau

Schuylkill County

- Schuylkill County Chamber of Commerce
- Schuylkill County Visitors Bureau
- Schuylkill Conservation District
- Schuylkill County Economic Development Director
- Schuylkill County Commissioner
- Pottsville City Administrator
- Shenandoah Chamber of Commerce
- Tamaqua Downtown Manager
- Tamaqua Borough Council

Other Organizations

- National Center for the American Revolution
- Jerry's Classic Cars & Collectibles Museum, Pottsville
- Delaware & Lehigh National Heritage Corridor
- Philadelphia Water Department
- Water Works Interpretive Center
- Berks County Conservancy
- Daniel Boone and Conrad Weiser Homesteads
- Tri-County Chamber of Commerce
- Conservancy of Montgomery County
- Phoenixville Area Economic Development Corp.
- Schuylkill River Development Council
- Greater Norristown Corporation
- PECO Energy
- Pennsylvania Environmental Council
- Manayunk Development Corporation



- Greater Philadelphia First
- French & Pickering Creeks Conservation Trust
- Green Valleys Association
- Schuylkill Center for Environmental Education
- Hawk Mountain Sanctuary
- Orwigsburg Historical Society
- Schuylkill County Coalition of Historical Societies and Museums
- Schuylkill River Greenway Association

5.3 SUMMARY OF MAJOR ISSUES IDENTIFIED

The following heritage area issues and sub-issues were identified during the public scoping period.

- Visibility of the heritage area
 - Marketing
 - Education
 - Identity of the Schuylkill River Watershed
 - Signage
- Economic development
 - Return on investment
 - Assistance to small businesses
- Need for connections
 - Access to the River
 - Trails
 - Transportation corridors
 - Thematic connections (internal and external to neighboring heritage areas)
- Resource protection
 - Water quality maintenance and restoration
 - Impacts of heritage area activities and visitation
 - Threats to open space, agricultural, environmental, and recreational resources
- Historic preservation
 - Historic district designation
 - Rehabilitation/adaptive reuse of historic properties and materials
 - Identification of lost resources
- Quality of life
- Coordination
 - Governmental jurisdictions
 - Private organizations
- Reaching diverse ethnic communities
- Need for focus



5.4 AGENCY COORDINATION

During the initial scoping process a letter describing the project and requesting input on issues of concern was sent to representatives of state and federal agencies that would potentially have interest in the Management Plan and EIS. Response letters were received from two of the agencies, the United States Coast Guard and the U.S. Army Corps of Engineers, indicating support for the heritage area initiative. The following is a list of representatives and agencies to whom letters were sent.

- The Honorable Robert Borski, U.S. House of Representatives
- The Honorable Robert Brady, U.S. House of Representatives
- Robert Callegari, U.S. Army Corps of Engineers – Planning
- John Carpenter, U.S. Department of Housing & Urban Development
- Carol Collier, Delaware River Basin Commission
- John Coscia, Delaware Valley Regional Planning Commission
- Anthony Cunningham, Office of U.S. Senator Arlen Specter
- William DeVito, Office of U.S. Senator Rick Santorum
- Joseph DiBello, National Park Service
- The Honorable Mike Doyle, U.S. House of Representatives
- The Honorable Phil English, U.S. House of Representatives
- The Honorable Chaka Fattah, U.S. House of Representatives
- Tom Ford, Pennsylvania Fish and Boat Commission
- Paul Gaudini, U.S. Army Corps of Engineers – Planning
- Don Gephart, Pennsylvania Department of Conservation & Natural Resources
- Dr. Brent Glass, Pennsylvania Historic and Museum Commission
- Robert Guami, U.S. Environmental Protection Agency, Region III –Brownfields
- Gerard Hertel, U.S. Forest Service
- The Honorable Joe Hoeffel, U.S. House of Representatives
- The Honorable Tim Holden, U.S. House of Representatives
- Donald Kerns, U.S. Postal Service
- Barry Leatherman, U.S. Army Corps of Engineers
- Carol Lee, Pennsylvania Historic and Museum Commission
- Bill Manner, Pennsylvania Department of Environmental Protection
- Thomas Majusiak, U.S. Federal Emergency Management Agency, Mitigation Division
- Jay McGee, Pennsylvania Department of Transportation
- Natural Resource Conservation Service, Community Assistance & Resource Development Division
- Pennsylvania Department of Environmental Protection, Southern Regional Office



- Joseph Piotrowski, U.S. Environmental Protection Agency, Region III
- The Honorable Joseph Pitts, U.S. House of Representatives
- Marie Rust, National Park Service
- Flavia Rutkowski, U.S. Fish and Wildlife Service, Northeast Region
- The Honorable Richard Santorum, U.S. Senate
- The Honorable Arlen Specter, U.S. Senate
- Glen Stevens, U.S. Army Corps of Engineers
- Tom Stolle, U.S. Environmental Protection Agency – Brownfields Economic Development Initiative
- Barbara Stratton, U.S. Army Corps of Engineers
- U.S. Coast Guard – 5th District
- U.S. Department of Transportation, Federal Highway Administration
- C. Lee Ware, U.S. Army Corps of Engineers – Planning
- The Honorable Curt Weldon, U.S. House of Representatives
- Joseph Yarborough, Pennsylvania Department of Community and Economic Development

5.5 SUMMARY OF STEPS TAKEN TO IDENTIFY AND INVOLVE LOW-INCOME AND MINORITY COMMUNITIES

The following efforts included attempts to identify and involve low income and minority communities:

- Consultation with local government officials in all heritage area counties
- Consultation and involvement of non profit organizations representing heritage area residents
- Public involvement through three sets of public meetings in different parts of the heritage area

5.6 LIST OF PREPARERS

CONSULTANT TEAM

Wallace Roberts & Todd, LLC, Lead Consultant

David Hamme, Principal-in-Charge

David Rouse, Project Director

Nick Napoli, Project Planner

Sarah Endriss, Project Planner

Economics Research Associates

Bill Owens, Principal-in-Charge

David Versel, Project Director

History Now

Avi Decter, Principal



STEERING COMMITTEE

Dixie F. Swenson, former Executive Director, Schuylkill River
Greenway Association
Jane L. S. Davidson, Chester County Parks and Recreation
Department
Dennis DeMara, Pennsylvania Department of Conservation and
Natural Resources
Joseph DiBello, National Park Service
Mark Major, Schuylkill County Visitors Bureau
Kay Smith, Manayunk Development Corporation
Mike Stokes, Montgomery County Planning Commission

5.7 LIST OF RECIPIENTS

The following agencies were sent copies of the Draft Management Plan and EIS.

FEDERAL AGENCIES

Delaware River Basin Commission
Federal Emergency Management Agency
U.S. Army Corps of Engineers
U.S. Coast Guard
U.S. Department of Housing and Urban Development
U.S. Department of the Interior, National Park Service:
– Northeast Regional Office
– Hopewell Furnace National Historic Site
– Valley Forge National Historical Park
U.S. Department of the Interior, United States Fish and Wildlife
Service
U.S. Department of Transportation, Federal Highway Administration
U.S. Environmental Protection Agency, Region III
U.S. Fish and Wildlife Service
U.S. Forest Service
U.S. Natural Resource Conservation Service
U.S. Postal Service

STATE, REGIONAL, AND LOCAL AGENCIES

Berks County Commissioners
Berks County Planning Commission
Chester County Commissioners
City of Philadelphia
Delaware Valley Regional Planning Commission
Montgomery County Commissioners
PA Department of Conservation and Natural Resources
PA Department of Environmental Protection



PA Department of Transportation
PA Historical and Museum Commission
Schuylkill County Commissioners

5.8 RESPONSES TO COMMENTS

The following questions and comments on the Draft Management Plan and Environmental Impact Statement (EIS) were made during the three public hearings or received in writing during the public comment period.

Question: Which has the greatest priority, resource conservation or economic/community development?

Response: A fundamental premise of the Management Plan and EIS is that resource conservation and economic development are not mutually exclusive, but can work together for the benefit of the quality of life of local communities. Hence both are important, as the conservation of heritage resources provides the foundation for sustainable economic activity (e.g., heritage tourism) based on those resources.

Question: How is farmland preservation addressed in the Management Plan and EIS?

Response: The Management Plan characterizes the agricultural landscape as an important heritage resource in the Schuylkill River Valley. Section 3.4.2 identifies the conversion of farmland to suburban development as an important land use issue and describes current farmland preservation efforts by heritage area counties. Strategy 1C calls for sustainable land use, open space, and greenway planning and preservation related to the Schuylkill River Valley's cultural and natural landscapes. Farmland preservation initiatives involving partnerships among agencies and organizations in the heritage area are covered by this strategy.

Questions: How is the carrying capacity of the Schuylkill River addressed in the Management Plan and EIS?

What can be done to change the current health of the River?

Response: Improving the water quality of the Schuylkill River is an integral part of the "Reclaiming the River" interpretive theme. One of the priority action recommendations of the Plan is to institute a coordinated, watershed-wide water quality monitoring program. This program will provide



baseline information for monitoring changes over time and identifying needs for projects to improve water quality in different parts of the watershed.

Question: How will headwater areas not included within the Schuylkill River Valley National Heritage Area (i.e., located within the overall watershed but not within one of the five counties that are covered by the heritage area) be addressed?

Response: Because of the limits of congressional authorization, such headwater areas are not addressed by the Management Plan and project funding under the National Heritage Areas program will be limited to the officially designated boundaries. However, the intent of the initiative is not to set barriers, but rather to encourage collaboration and coordination among a variety of local, state, and federal agencies. Thus the heritage area management entity can work with other organizations to leverage resources and funding sources in order to address areas outside of the officially designated boundaries.

Question: Was the establishment of the new Cabela's store accounted for in the projections for the preferred alternative?

Response: The proposal for a Cabela's retail destination within the heritage area near the Schuylkill/Berks County line emerged during preparation of the Management Plan. For this reason and because it is unclear until the store opens what kind of visitation it will attract, Cabela's was not taken into account in the projections. It is clear that the store has the potential to significantly increase heritage tourism in the region. However, linkages to other heritage attractions and communities are needed if this increase is to be realized.

Comment: The analysis of environmental consequences is more qualitative than quantitative.

Response: Because the Management Plan is programmatic in scope, the Environmental Consequences chapter does not discuss impacts at the site-specific project level. Instead, it generally addresses the types of impacts that could be associated with the strategies and action items emphasized by each of the alternatives. Additional assessment of environmental impacts may be necessary for future site-specific projects involving federal funding or action. The Final Management Plan and Environmental Impact Statement have been revised to emphasize this point (p. 4-1).



Comment: The Berks County Planning Commission recognizes and supports the mission, vision statement, goals, and strategies of the Schuylkill River National Heritage Area.

Response: The support expressed by the Berks County Planning Commission for the Schuylkill River Valley National Heritage Area is appreciated. Successful implementation of the Management Plan will be dependent upon partnerships with counties, other governmental agencies, private organizations, and citizens throughout the planning area.

Comment: The Berks County Planning Commission recommends that additional Berks County resources be included in the Chapter 3.0 (Affected Environment).

Response: The description of heritage resources in Chapter 3.0 is intended to be illustrative rather than exhaustive in scope. It is impossible to address all of the heritage resources in such a large and complex area within the scope of the Management Plan. Nevertheless, some of the resources identified by the Berks County Planning Commission have been included in the Final Management Plan and EIS.

Comment: The Berks County Planning Commission recommends that all county and regional planning agencies in this National Heritage Area be offered the chance to review this document.

Response: All five heritage area counties, as well as the Delaware River Basin Commission and the Delaware Valley Regional Planning Commission, were included on the distribution list for the Draft Management Plan and EIS.

Comment: The Hopewell Furnace National Historical Site should be included in the list of national and state parks in Section 3.3.1 of the Affected Environment chapter. Also, the Appalachian Trail is a unit of the National Park Service.

Response: The Final Management Plan and EIS have been revised to address these comments.

Comment: While site-specific impact analyses may not be available or appropriate at this stage of planning, we [the Environmental Protection Agency] suggest that the Final EIS include a discussion of the types of impacts usually associated with the “actions” described throughout Chapter 2.0 (Plan Alternatives).



Response: As noted above, the level of impact analysis is geared toward the programmatic scope of the Management Plan and EIS. Additional assessment of environmental impacts may be required as necessary under the NEPA process for future site-specific projects involving federal funding or action. Nevertheless, Chapter 4.0 (Environmental Consequences) has been extensively revised for the Final Management Plan and EIS to address the anticipated environmental impacts of the types of actions anticipated under Management Plan programs in more depth and to tie the discussion of impacts more closely to the strategies and actions contained in Chapter 2.0

Comment: Regarding the impacts to National Parks, Monuments, and Forests, it was stated that there would be no impairment from the project, however, there was no discussion if any impact would occur to the parks, monuments, or forests.

Response: The Draft Management Plan and EIS states that the potential impacts on National Park Service properties within the heritage area have been reviewed and it has been determined that impairment will not occur. National Park Service properties or units in the heritage area include Valley Forge National Historical Park, Hopewell Furnace National Historical Site, and the Appalachian Trail. Chapter 4.0 (Environmental Consequences) of the Final Management Plan and Environmental Impact Statement has been revised to specifically address impacts to these properties.

Comment: EPA suggests that if additional impact assessment is not completed prior to the issuance of a Record of Decision, future actions associated with this Draft Management Plan and EIS (federal funding or require major federal actions) should undergo additional NEPA project level assessment prior to implementation.

Response: As noted, Chapter 4.0 (Environmental Consequences) of the Final Management Plan and EIS has been revised to more extensively address potential environmental impacts associated with the plan strategies and actions. Because the Management Plan is programmatic in scope, future actions may be required to undergo project level environmental assessment prior to implementation as required by NEPA.

Comment: The Management Plan ultimately may involve some development in areas designated by the Federal Emergency Management Agency (FEMA) as Special Flood Hazard



Areas. Any such development will require compliance with floodplain management ordinances of local communities. This project is also subject to Executive Order 11988, which directs federal agencies to “avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative.”

Response: Floodplain impacts resulting from the Management Plan are expected to be minimal and limited to the establishment of outdoor recreational facilities, including trails and boat landings on already disturbed areas within the 100-year floodplain. Any proposed development within Special Flood Hazard Areas will be required to comply with all local, state, and federal applicable regulations and policies.