

**FINDING OF NO SIGNIFICANT IMPACT
THE WATER WHEEL AND CASEY'S CANOE LIVERY RESTORATION PROJECT
ENVIRONMENTAL ASSESSMENT
SLEEPING BEAR DUNES NATIONAL LAKESHORE**

Background

The Water Wheel property (tracts 46-112/46-147), located on the north side of Platte River In Sleeping Bear Dunes National Lakeshore (Lakeshore), was formerly a canoe livery, with docks, gas pump, and a small water wheel in the Platte River. In addition, there was a miniature golf course, two cabins, a barn, and gas pumps, located throughout the upland portion of the site. This property was incorporated into federal land over a period of time, beginning in 1979 and ending in 1989.

Casey's Canoe Livery property (tract 46-108), located on the south side of Platte River, was a canoe livery that also offered gas station and store services. This property was incorporated into federal land in April 1989.

When Casey's building improvements were removed from the site, extensive soil and ground water contamination from benzene, due to leaking underground storage tanks, was discovered. Contamination remediation occurred over a 6-year period.

Even though the contamination issues of the former Casey's property were addressed, some of the features installed for contamination containment remain on site, including the steel sheet piling at the former Casey's property and three monitoring wells on the former Water Wheel property.

Furthermore, additional man-made features that were in place prior to the contamination clean-up remain on-site, including a concrete retaining wall and fill on the Water Wheel property and a wooden wall and fill on Casey's property. These walls are now failing and impacting the natural resources and creating potential safety hazards for Lakeshore visitors.

The National Park Service (NPS) at the Lakeshore prepared an Environmental Assessment (EA) to identify alternatives that, if implemented, would: 1) restore a 450-foot reach of the Platte River to its natural function and appearance and 2) would mitigate unsafe visitor access issues due to failing retaining walls and exposed steel sheet piling.

Alternatives

Under the No-Action Alternative, as described in the EA, the Lakeshore would allow the continuation of existing conditions and activities at the former Water Wheel and Casey's Canoe Livery sites, except for the monitoring wells, which will either be plugged or pulled.

The existing conditions include all artificial riverbank materials, including the steel sheet piling, stone rip-rap, wood wall and fill, concrete wall and fill and metal wall. The walls would continue to deteriorate and collapse into the river channel. The fill behind the walls would continue to erode. The erosion process would most likely accelerate once the walls completely collapsed due to the river's natural function and increased human access. Natural stabilization of the riverbanks would not be easily achieved due to the lack of plant colonization along the eroding banks. The steel sheet piling would remain in place, with the top edge exposed at the ground's surface, posing a visitor safety hazard. The stone rip-rap would also remain in place, hardening the river bottom and preventing the colonization of benthic invertebrates and improvement of fish habitat. Park visitors are currently launching a variety of watercraft from both sides of the river, areas

that are not designed for this type of activity. An NPS hardened launch facility is available nearby, on the other side of M-22 at the Platte River Picnic Area, on the north side of the river.

Under Alternative I (the Preferred Alternative), the following actions would occur:

- Sheet piling at the Casey's site will be either removed or cut at the water table level, depending on condition of the sheets.
- The stone rip-rap that is located in the Platte River in front of the steel sheet piling would be removed.
- The wood wall, located in the Platte River, would be removed. Removal of this structure would require minimal effort since it has greatly deteriorated.
- The fill that is located behind the wood wall would be completely removed using an excavator. The slope from the upper bank to the river's edge would be steep, matching the adjacent bank's contour that is located to the east of the wood wall fill area. A silt boom/curtain would be placed in the Platte River during the fill removal process. Revegetation of the riverbank would occur before the silt boom/curtain is removed. Some damage to existing tree roots is anticipated as they have grown into the filled areas. Hand removal of some fill may be needed to not compromise the native trees.
- The metal wall would be removed by hand. Removal of this structure would require minimal effort since it has greatly deteriorated.
- Access to the river's edge along the south side of the river (Casey's site) would be restricted during restoration activity and very limited after that due to the woody debris and plantings along the riverbanks. New plantings would minimize erosion and deter riverbank access. Woody debris would be placed in and along the riverbank to create fish and invertebrate habitat. The riverbank would not be hardened to allow for the type of high use that is currently occurring (i.e. launching inflatables, canoes, kayaks, and boats).
- The concrete wall, located on the north side of the Platte River (Water Wheel), would be completely removed.
- The fill that is located behind the concrete wall on the north side of the river would be completely removed. Machinery would be used to remove the fill, and a temporary road would be built by cutting into the hill to access the site. The adjacent cedar trees would be wrapped with a material, such as burlap, and anchored back toward the upper bank to minimize damage and cutting of limbs for machinery access.
The slope, beginning at the base of the cedar trees to the river's edge, would be steep, matching the natural riverbank slope. A silt boom/curtain would be placed in the Platte River during the fill removal process. Revegetation of the riverbank would occur before the silt boom/curtain is removed. Some damage to existing tree roots is anticipated as they have grown into the filled areas. Hand removal of some fill may be needed to not compromise the native trees.
- Lakeshore management will work with the adjacent landowner on the north side of the river on ways to reinforce or re-shape the riverbank adjacent to the landowner's retaining wall and will contract a survey of the property boundary, if necessary.
- The removal or plugging of the three monitoring wells has been approved by the Michigan Department of Environmental Quality-Cadillac Office and would occur under both alternatives.
- Access to the river's edge, along the north side of the river (Water Wheel site), would be restricted during restoration activity and very limited after that due to the woody debris and plantings along the riverbanks. New plantings would minimize erosion and deter riverbank access. Woody debris would be placed in and along the riverbank to create fish and invertebrate habitat. The riverbank would not be hardened to allow for the type of high use that is currently occurring (i.e. launching inflatables, canoes, kayaks, and boats).
- No heavy equipment will be operated in the Platte River channel and an absorbent boom will always be on site while heavy machinery is in use in case of an accidental oil release. In addition,

riverbanks will be temporarily closed to visitor use with signs to allow the vegetation to become established.

NPS Selected Alternative

The relative advantages and disadvantages of the No Action Alternative and Alternative 1 (Preferred Alternative) were identified and analyzed. The No Action Alternative was rejected because it would perpetuate artificial riverbanks and unsafe conditions (exposed metal walls and failing retaining walls), and continue launching activity in areas not designed for this type of activity. Alternative 1 is the selected alternative since it would restore a 450-foot reach of the Platte River to its natural function and appearance and would mitigate unsafe conditions. Visitor access to the river in this location would be restricted during construction activities and very limited after that due to the woody debris and plantings along the riverbanks. Watercraft launching would be discouraged, so as to prevent future degradation of the site. An NPS hardened launch facility is available nearby, on the other side of M-22, on the north side of the river.

Environmentally Preferable Alternative

As stated in Section 2.7.D of *Director's Order #12 and Handbook*, the environmentally preferable alternative is the alternative that will promote the national environmental policy expressed in the National Environmental Policy Act (NEPA) (Sec. 101 (b)). This includes alternatives that:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.
2. Ensure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings.
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.
4. Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.
5. Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

In essence, the environmentally preferable alternative would be the one that "causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (*2006 NPS Management Policies*).

Alternative 1, the selected alternative, is the environmentally preferable alternative because it best meets all the goals described above.

The Selected Alternative and Significance Criteria

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial:

The selected alternative would result in the restoration of a 450-foot reach of the Platte River to its natural function and appearance, and would mitigate unsafe visitor access issues due to failing retaining walls and exposed steel sheet piling. Impacts to soil/substrate and surface water quality will be short-term (about one month) and minor to moderate. A number of mitigation measures (such as silt booms and curtains) will be implemented to lessen the impact.

The degree to which the proposed action affects public health or safety:

The selected alternative would mitigate unsafe visitor access issues due to failing retaining walls and exposed steel sheet piling.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:

The selected alternative would not affect any resource listed, or eligible for listing, on the National Register of Historic Places, nor any significant natural or recreational park resources.

The degree to which the effects on the quality of the human environment is likely to be highly controversial:

This is not a controversial project. Public and agency comments have all been positive. Watercraft launching at this site will be discouraged, but an alternate developed launch facility is available at the Platte River Picnic Area on the other side of M-22.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:

There are no highly uncertain or unknown risks. Stream bank restoration projects such as this are quite commonplace.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:

The action would not establish a precedent for future actions with significant effects. Any future stream bank restoration projects would profit from experience gained at this site. Future projects would be evaluated for their potential for significant environmental effects.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:

The selected alternative would not significantly impact the resources of the Lakeshore. Any adverse effects, which would be short-term (less than one month), in conjunction with the adverse impacts of any other past, present, or reasonably foreseeable future actions, would result in negligible to minor cumulative impacts.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:

The selected alternative would not affect any resource listed, or eligible for listing, on the National Register of Historic Places, or any other significant park resources.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:

At the present time no known federally threatened or endangered species, proposed species, or designated or proposed critical habitat is present in the project area. The NPS informed the U.S. Fish and Wildlife Service

of this determination and they concurred. No formal Section 7 consultation with the U.S. Fish and Wildlife Service is required.

Whether the action threatens a violation of Federal, state, or local environmental protection law:

The selected alternative does not threaten a violation of Federal, state, or local environmental law. All applicable permits for implementation of this project have been secured.

Impairment:

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the selected alternative will not constitute an impairment to Lakeshore resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the project's environmental assessment and the professional judgment of the decision-maker guided by the direction in *2006 NPS Management Policies*.

Public Involvement

A scoping letter was sent to approximately 30 adjacent landowners, groups, and governmental agencies on February 27, 2007. Information on the project was also placed on the park's website. Two comments were received.

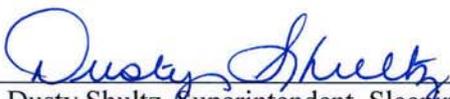
On June 22, 2007, a cover letter and copy of the EA were sent to approximately 30 adjacent landowners, groups, and governmental agencies. A press release was issued on June 22, 2007 about the EA availability. Additionally, copies of the EA were placed in seven area libraries and the document was accessible on the PEPC (Planning, Environment, and Public Comment) system through a link from the park's website. One comment letter was received during the 30-day review period that ended on July 24, 2007.

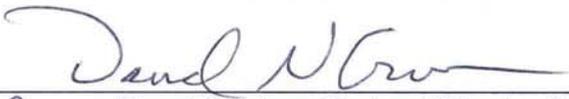
No agencies provided formal comments on the EA. However, we have been working very closely with the Michigan Department of Transportation and the Michigan Department of Environmental Quality on permit applications for this project, which included site visits from these agencies.

Conclusions

The selected alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are negligible or minor in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended by:  7/31/2007
Dusty Shultz, Superintendent, Sleeping Bear Dunes Date

Approved by:  8/2/07
Ernest Quintana, Regional Director, Midwest Region Date