

LEELANAU SCENIC HERITAGE ROUTE TRAILWAY PLAN

SLEEPING BEAR DUNES NATIONAL LAKESHORE

FINDING OF NO SIGNIFICANT IMPACT

BACKGROUND

The *Leelanau Scenic Heritage Route Trailway Plan/Environmental Assessment* was prepared to identify and analyze alternative ways to provide a continuous scenic pathway from Manning Road at the south boundary of Leelanau County to the north boundary of the Lakeshore at Good Harbor Bay, County Road 651, all within Leelanau County.

The approximate 27-mile non-motorized multi-use trail will generally parallel M-22 and M-109, the major roads through the Lakeshore. The trail will be on public land, either Lakeshore lands or within state highway or county road rights-of-way. The trail will be separated from the roadway wherever possible and will provide a safe, alternative transportation opportunity for park visitors and residents. It will connect the park's primary visitor sites and facilities; including the popular Visitor Center, Pierce Stocking Scenic Drive, Dune Climb, D. H. Day Campground, Glen Haven Village, the Port Oneida Rural Historic District, Lake Michigan beaches, trailheads, and other points of interest within the Lakeshore. It will also provide a non-motorized trail connection between popular park sites and the Village of Empire and the community of Glen Arbor.

Over 1.1 million people visit Sleeping Bear Dunes National Lakeshore annually. The Lakeshore seeks to develop a multi-modal transportation system that will meet the park's current and future needs. This includes the development of a cohesive non-motorized multi-use trail network within the Lakeshore that connects and provides non-motorized access to the park's main visitor facilities, such as the Dune Climb (330,000+ visitors/year), Pierce Stocking Scenic Drive (430,000+ visitors/year), and Visitor Center (130,000+ visitors/year). The majority of the Lakeshore's visitation occurs between the months of June and September. These facilities would be connected by the proposed multi-use trail, which will provide park visitors with safe non-motorized access and help relieve traffic and parking congestion at these facilities. Trail use projections are estimated for the first three years at approximately 350,000–400,000 visitors/year.

The trail proposal is included in the *2009 Final General Management Plan/Wilderness Study/Environmental Impact Statement* (GMP). The selected trail route is consistent with management zoning in the GMP.

The Trailway project was initiated by the Leelanau Scenic Heritage Route Trailway Work Group; a subcommittee of the Leelanau Scenic Heritage Route Committee that was designated in 2001 under the Michigan Department of Transportation (MDOT) State Heritage Route Program and is coordinated by the Northwest Michigan Council of Governments (NWMCOG). This Work Group includes representatives of the Northwest Michigan Council of Governments, MDOT, Friends of Sleeping Bear Dunes, Traverse Area Recreation and Transportations Trails, Inc. (TART), Leelanau County Road Commission, Leelanau County Planning Commission, Village of Empire, Glen Arbor Township, Cleveland Township, Centerville Township, Empire Township, National Park Service-Sleeping Bear Dunes National Lakeshore, National Park Service-Rivers, Trails and Conservation Assistance Program, and local citizens.

The vision of the Trailway Work Group plan was to:

“Create a non-motorized linear trailway system that is connected to historical, cultural, recreational, and environmental points of interest throughout the Lakeshore and surrounding communities; a Trailway that promotes health, environmental, social, and economic benefits and provides a safe alternative for walking, biking, running, and cross-country skiing; and is universally accessible wherever possible.”

A set of guiding principles were developed to help direct the planning process:

1. Promote and encourage people to engage in healthy lifestyles benefiting from non-motorized trails.
2. Strengthen trail connections and existing trail heads, communities, and points of interest within the project boundary.
3. Enhance the recreational experience within the Sleeping Bear Dunes National Lakeshore (Lakeshore) and project area.
4. Incorporate universal design principles with regard to trail alignment, cross-sectional design, and trail head development.
5. Consider the impacts that could occur to historic properties and archeological resources.
6. Consider the impacts that could occur to the environment and existing ecosystems.
7. Design a trail cross-section and trail alignment that is sustainable with regard to materials.
8. Provide a safe non-motorized trail facility.

Minimum design requirements identified included: meeting all MDOT and American Society of State Highway Transportation Official (ASHTO) design requirements for development of a bicycle and pedestrian trailway, meeting Americans with Disabilities Act (ADA) requirements where feasible, and determining the surface material to accommodate all modes of non-motorized use, including a hardened surface for bicycling.

SELECTED ALTERNATIVE

Alternative B, the preferred alternative in the Environmental Assessment (EA), is the selected alternative. Under this alternative, a non-motorized trail would be constructed in M-22/M-109 and county road rights-of-way, but deviating from the highway corridor where possible, on Lakeshore lands, to avoid physical or environmental constraints, provide access to natural, cultural, or recreation resources, and to promote a broader variety of experiences for the Trailway user. No Trailway development would occur on private lands. It would be a contiguous non-motorized trail of over 27 miles commencing from the southern Leelanau County line at Manning Road to County Road 651 at Good Harbor Beach. Disturbance of interior vegetated areas, steep slopes, and difficult soils would be minimized and sensitively planned. Trail user experience would be less closely associated with the highway or road right-of-way than in alternative A.

Access to the Trailway will be made at existing Lakeshore trailheads and designated visitor parking areas located along or near M-22 and M-109, including the Pierce Stocking Scenic Drive lower parking area, Dune Climb, Glen Haven, Bay View Trailhead, Port Oneida, and Lake Michigan beaches at Bohemian Road (CR 669) and Good Harbor Trail (CR 651). Some new trailheads may also be proposed, especially at either end of the Trailway. Such trailheads and parking areas may be augmented with Trailway “wayfinding” maps and information as well as provide bike racks, benches, picnic tables, potable water/drinking fountains, interpretive information, and restroom facilities. Universal accessibility signage and amenities as well as trail segment, trail challenge level information, and mileage markers would also be used.

The selected alternative trail route is shown on the attached map.

MITIGATION MEASURES FOR THE SELECTED ALTERNATIVE

Mitigation measures are included in the Selected Alternative and have been developed to lessen any adverse impacts:

Resource Category	Mitigation
Topography; Soils	<p>In order to minimize significant earthwork, landform change construction limits would be marked prior to beginning any work under the proposed contract.</p> <p>Standard erosion control best management practices, including silt fencing, would be used in areas of steep topography. Erosion control would also include prompt temporary/permanent restoration to disturbed areas in order to reduce destructive erosion.</p> <p>Stock piling and placement of fill material and/or existing soil would be verified by NPS staff and private consultant.</p>
Wetlands; Streams/Creeks	<p>The contractor would be required to use best management practices, as well as follow all state and local guidelines when working in or near regulated wetlands.</p> <p>Standard practices would include sediment control fencing, limited construction area, and other suitable measures to protect wetlands.</p>
Wildlife	<p>Workers would maintain a defined work area perimeter and would keep all construction – related effects within construction limits.</p> <p>Construction activities would not be allowed at night in order to allow wildlife to return to their roosts or dens, and forage in areas within the project vicinity. A construction schedule would be required by the contractor indicating progress and operating hours in order to limit construction activities to a desired time frame.</p>
Vegetation	<p>In order to minimize significant earthwork, landform change construction limits would be marked prior to beginning any work under the proposed contract.</p> <p>Standard erosion control best management practices, including silt fencing, would be used in areas of steep topography.</p> <p>A professional biologist or NPS staff would prepare a list of native plant species that would be affected by the project and identify a plan for relocating plants. If required, other plant species within the construction vicinity would be marked and flagged with protective fencing.</p> <p>At the completion of the project, restoration would occur, which would include soil preparation and native seeding.</p>
Land Use	<p>A project schedule would be required in order to limit disturbance to private housing developments and commercial businesses within the vicinity of the Village of Empire and Glen Arbor.</p> <p>Provide adequate orientation to construction personnel prior to construction to limit potential conflicts with existing land use.</p>
Cultural Landscape/ Historic Resources; Viewsheds	<p>Implement ground-disturbing actions to avoid potential disturbance to existing cultural landscapes and historic sites.</p> <p>Include resource protection measures in the construction documents to protect existing resources. Set construction limits that are clearly marked and instruct workers to avoid conducting activities beyond the construction limits.</p> <p>To ensure a safe working environment and protection of existing resources, a safety supervisor and/or quality control officer would be required of the contractor.</p> <p>Provide adequate orientation to construction personnel prior to construction to limit potential conflicts with existing land use.</p>

Resource Category	Mitigation
Safety; Lakeshore Visitor Experience; Park Operations	<p>The contractor would be required to schedule activities in consultation with NPS staff to minimize conflicts with daily park operations and other park projects.</p> <p>Include resource protection measures in the construction documents to protect existing resources. Set construction limits that are clearly marked and instruct workers to avoid conducting activities beyond the construction limits.</p> <p>To ensure a safe working environment and protection of existing resources, a safety supervisor and/or quality control officer would be required of the contractor.</p> <p>Provide adequate orientation to construction personnel prior to construction to limit potential conflicts with existing land use.</p>

OTHER ALTERNATIVES CONSIDERED

The no-action alternative and alternative A were alternatives carried forward for analysis in the EA. In the no-action alternative, there are no non-motorized, hardened surface trails within the M-22/M-109 corridors. The current Lakeshore trail system (in Leelanau County) offers hiking trails with trailheads at Empire Bluffs, Windy Moraine, Shauger Hill, Cottonwood (Pierce Stocking Scenic Drive), Dune Climb, Alligator Hill, Bay View, Pyramid Point, and Good Harbor Bay. Only the paved Pierce Stocking Scenic Drive is designated for bicycle use, with a shared lane adjacent the road surface. Currently, bicyclists are limited to the road shoulder along M-22, M-109, and county roads.

Under alternative A, a non-motorized trail would be constructed in the M-22/M-109 and county roads rights-of-way to the extent possible, only deviating where necessary due to physical or environmental constraints. It would be a contiguous non-motorized trail of over 27 miles commencing from the southern Leelanau County line at Manning Road to County Road 651 at Good Harbor Beach (see Figure Map A). Disturbance of interior vegetated areas, or areas with steep side slope and gradients would be avoided, but the trail user experience would be closely associated with the highway right-of-way.

Access to the trail would be made at the existing Lakeshore trailheads and designated visitor parking areas, including the Pierce Stocking Scenic Drive lower parking area, Dune Climb, Glen Haven, Bay View Trailhead, and Lake Michigan beaches at Bohemian Road and Good Harbor Trail, and in conjunction with the Port Oneida Rural Historic District Plan and Glen Haven Rehabilitation Plan. Some new trailheads may also be proposed. Such trailheads and parking areas may be augmented with Trailway “wayfinding” maps and information, and may provide bike racks, benches, picnic tables, potable water/drinking fountains, interpretive information, and restroom facilities. Universal Accessibility signage and amenities as well as trail segment, trail challenge level information and mileage markers would also be used.

A number of other options were considered by the Trailway Committee during the planning process, but were eliminated due to excessive grading issues, impacts to private property, steep topography, potential impacts on proposed wilderness, or safety. These options were included in an appendix to the EA.

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 preferred 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.

The No-Action alternative, which represents “business as usual,” would cause the least damage to the biological and physical environment, since no new construction would be implemented (realizes criterion 1). Lakeshore visitors, mostly bicyclists, would continue to use existing state highways and county roads. Hiking would continue on existing trails. The no-action alternative would not fully realize criteria 3, 4, and 5 to the same extent as alternatives A and B (the selected) because it offers fewer recreational opportunities. It would not realize criterion 2 because visitors would use road shoulders (where available) and safety concerns would be paramount. It also would not realize criterion 6 because no resource recycling would occur, such as the use of renewable, sustainable construction materials.

Alternative A would cause some damage to the biological and physical environment due to new construction. However, much of the construction would occur in disturbed areas in the highway or county road right-of-way, so impact would be reduced. Criterion 2 would be realized because most of the trail would be separate from the highway surface to provide a safe experience. Only in a few instances, because of physical limitations, would the road shoulder be used as the trail. Criteria 3-5 would be fully realized. This alternative would provide additional access to natural, cultural, and recreational resources; would provide alternative modes of transportation; and provide greater opportunities for interpretation (e.g., narrow gauge railroad, Glen Haven, and ponds and wetlands). Renewable, sustainable construction materials would be used to the extent possible.

Alternative B, the selected alternative, would cause some damage to the biological and physical environment due to new construction. However, much of the construction would occur in disturbed areas in the highway right-of-way, so impact would be reduced. In keeping with the concept of this alternative, however, in some areas the trail would diverge from the highway right-of-way and, in some cases, would be constructed in areas of very little previous disturbance. As in alternative A, criteria 2-5 would be realized, to an even greater extent than alternative A, since the divergent route locations would provide an array of recreational, cultural, and interpretive opportunities. Renewable, sustainable construction materials would be used to the extent possible.

Overall, the no-action alternative is the one that causes the least damage to the biological and physical environment and would best preserve, protect, and enhance historic, cultural, and natural resources; it is the environmentally preferable alternative. However, the no-action alternative does not satisfy many of the guiding principles described previously.

THE SELECTED ALTERNATIVE AND SIGNIFICANCE CRITERIA

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

1. 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:

No long-term major adverse or beneficial impacts were identified that require analysis in an environmental impact statement.

The selected alternative will result in long-term negligible adverse and beneficial impacts to socioeconomics. There may be increases in the number of visitors who use the Trailway, and they may stay in the area longer. Community services may be affected due to increased visitation. Adjacent land use may be affected, especially in areas where driveways are concentrated, and vehicle-Trailway conflicts are possible. Long-term minor adverse impacts to topography, wetlands and water quality, vegetation and wildlife, Michigan state-listed species, soils, operations and maintenance are expected. Long-term moderate adverse impacts to operations and maintenance are expected, since this project, when completed, will require a large commitment of time and money for maintenance, even with the use of sustainable materials to the extent possible. Long-term beneficial moderate impacts are expected for visitor opportunities and use.

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

Two of the guiding principles (described previously) for development of this project were to: 1) promote and encourage people to engage in healthy lifestyles benefiting from non-motorized trails and 2) provide a safe non-motorized trail facility. This project will promote non-motorized recreation and should result in more exercise and less motor vehicle use. Except for needed road crossings, the Trailway will use a route that is segregated from motorized vehicle travel lanes.

3. 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 Trailway traverses Sleeping Bear Dunes National Lakeshore through a variety of interesting and unique natural and cultural resources. Measures have been taken to avoid adverse impacts to cultural resources by re-routing the trail or using a less-contrasting trail surface (limestone fines) in cultural landscapes. There are prime and unique farmlands in the area, but the Trailway avoids them by using areas of disturbed soils, in road or narrow gauge railroad rights-of-way. Boardwalks are planned where wetland avoidance is not possible. The Trailway will cross or skirt the Crystal River, a stream listed on the Nationwide Rivers Inventory, using existing county road rights-of-way. Critical ecological areas have been avoided.

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

There were no highly controversial effects identified during either the preparation of the Environmental Assessment or during the two public review periods.

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

There were no highly uncertain, unique, or unknown risks identified during either the preparation of the Environmental Assessment or during the two public review periods.

6. 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 selected alternative neither establishes a National Park Service precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

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

Other past, present, and reasonably foreseeable future management activities at the Lakeshore and in the surrounding region include: Improvements to parking areas—ends of Leelanau County Roads 651 and 669 (past-2008), Dune Climb Parking Area—paving and other minor improvements (past-2008), Glen Haven Village improvements (future), Lake Michigan overlooks improvements—Pierce Stocking Scenic Drive (future), and MDOT road widening on M-22 (future).

Long-term adverse impacts will occur to topography, wetlands and water quality, vegetation and wildlife, Michigan state-listed species, soils, socioeconomics, and operations and maintenance. Other past, present, and reasonably foreseeable future actions are expected to contribute very little to adverse impacts to these resources because they are almost exclusively in previously-disturbed areas. Long-term beneficial impacts will occur to socioeconomics and visitor opportunities and use. Other past, present, and reasonably foreseeable future actions are expected to add minor to moderate beneficial impacts to this project, since they all relate directly to it and function as either attractions or support services along the Trailway.

8. 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:

This action will not adversely affect any resources listed on, or eligible for, the National Register of Historic Places, nor will it impact any other significant park resources. Measures have been taken to avoid adverse impacts to cultural resources by re-routing the trail or using a less-contrasting trail surface (limestone fines) in cultural landscapes.

The National Park Service has determined that the selected alternative will not adversely affect historic properties. The Michigan State Historic Preservation Officer was consulted and concurred with this finding in a letter dated July 7, 2009.

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

Section 7 of the Endangered Species Act requires federal agencies to consult with U.S. Fish and Wildlife Service (USFWS) when any activity permitted, funded, or conducted by that agency may affect a listed species or designated critical habitat, or is likely to jeopardize proposed species or adversely modify proposed critical habitat. The National Park Service has a close relationship with the USFWS and

routinely discusses threatened and endangered species issues in the Lakeshore. The USFWS has identified three threatened and endangered species within the Lakeshore: endangered piping plover (*Charadrius melodus*), endangered Michigan monkey flower (*Mimulus glabratus* var. *michiganensis*), and threatened Pitcher's thistle (*Cirseum pitcheri*). Additionally, the breeding range of the Indiana bat (*Myotis sodalist*) occurs within the southern half and western coastal counties of the Lower Peninsula of Michigan, including Benzie and Leelanau Counties. However, even with suitable habitat in the Lakeshore (highly variable forested landscapes in riparian, bottomland, and upland areas that have roosting trees with crevices or exfoliating bark), this species has not been confirmed within the Lakeshore. None of the listed species are in the vicinity of the proposed Trailway, nor would be affected by it.

10. Whether the action threatens a violation of federal, state, or local environmental protection law:

The selected alternative will not violate any federal, state, or local environmental protection laws.

IMPAIRMENT OF PARK RESOURCES OR VALUES

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, the agency and public comments received, and the professional judgment of the decision-maker guided by the direction in *2006 NPS Management Policies*.

PUBLIC INVOLVEMENT

In 2006, the Leelanau Scenic Heritage Route Committee created a Trailway Work Group to develop a multi-use, non-motorized trailway along the M-22 and M-109 corridor in the Lakeshore in Leelanau County. The Work Group includes members from the Lakeshore, the Michigan Department of Transportation, townships and one village, the Friends of Sleeping Bear Dunes, TART Trails, Inc., and interested citizens. The Trailway concept was presented in August 2006 and 2007 at Port Oneida Days at the Lakeshore. Introductory presentations were made to local governments in 2006 and follow up presentations made in 2008. The Trailway EA was on public review from October 1-31, 2008, and an open house was held at the Glen Arbor Township Hall on October 16, 2008, with 20 people attending.

Based on public comment on three segments (37 written comments), the EA was revised and placed on another public review from March 5 to April 4, 2009. Five written comments were received during this second comment period and were generally favorable.

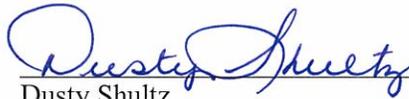
The Michigan State Historic Preservation Office concurred with the National Park Service's finding of *no adverse effect* to cultural resources in a letter dated July 7, 2009.

CONCLUSION

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 environment impacts that could occur are minor or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, or other unique characteristics of the region. There are no unmitigated adverse impacts on sites or districts listed in or eligible for listing in the National Register of Historic Places. No 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:



Dusty Shultz

Superintendent, Sleeping Bear Dunes National Lakeshore

8-18-2009

Date

Approved:



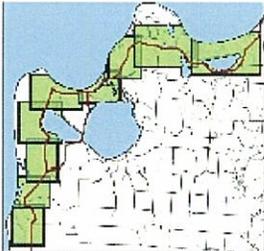
David Given

Acting Midwest Regional Director

8/27/09

Date

MAP B
PROPOSED TRAILWAY ALTERNATIVE B
 LEELANAU SCENIC HERITAGE ROUTE TRAILWAY MASTER PLAN



TRAIL LEGEND

— Proposed Trailway



GENERAL LEGEND

- State Trunkline
- County Primary Roads
- County Local Roads
- Village Roads
- Other Roads
- Existing Hiking & Skiing Trails
- Recommended SLBE
- Wilderness Boundary (1981)
- SLBE Boundary
- Rivers
- Lakes
- Village Boundaries
- Township Boundaries
- Aquatic Bed
- Forested
- Agricultural



Scale: 1:25,000
 1" = 200 Feet
 1:50,000
 1" = 400 Feet

