

WETLAND STATEMENT OF FINDINGS
For
EXECUTIVE ORDER 11990
And
NATIONAL PARK SERVICE DIRECTOR'S ORDER 77-1:
WETLAND PROTECTION

Develop the Stanford Parking Area (PEPC 59739)

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INTRODUCTION

The National Park Service (NPS) has prepared this Wetland Statement of Findings (WSOF) in accordance with NPS Director's Order #77-1: Wetland Protection for a project that will construct a new parking lot on Stanford Road at Cuyahoga Valley National Park (park). Director's Order #77-1 establishes NPS policies, requirements, and standards for implementing Presidential Executive Order 11990, Protection of Wetlands.

This WSOF describes (1) the proposed project and project alternatives; (2) effects of the proposed project on wetlands; (3) mitigation measures that avoid, reduce, or compensate for adverse effects of the project on wetlands, and (4) how the project and mitigations ensure "no net loss" of wetland functions or values.

PURPOSE AND NEED FOR THE PROPOSED ACTION

The NPS is partnering with the Conservancy for Cuyahoga Valley National Park to construct a new parking lot to support equestrian and pedestrian visitors to the park at a site on Stanford Road near the Stanford House in the Village of Peninsula, Summit County, Ohio (Figure 1). The project was first proposed in the park's 2012 "Boston Mills Area Concept and Site Plan" (PEPC #37320) with a purpose to create "an integrated approach for improving visitor circulation and parking infrastructure" and a need to address "congestion and competition for parking" in one of the park's most-visited and most-congested areas. The purpose of the proposed parking lot is to provide alternative parking for visitors outside of but near the Boston Mills area. The proposed lot would provide designated parking for approximately 15 horse trailers and 40 cars, including two spaces designated for handicapped accessibility.

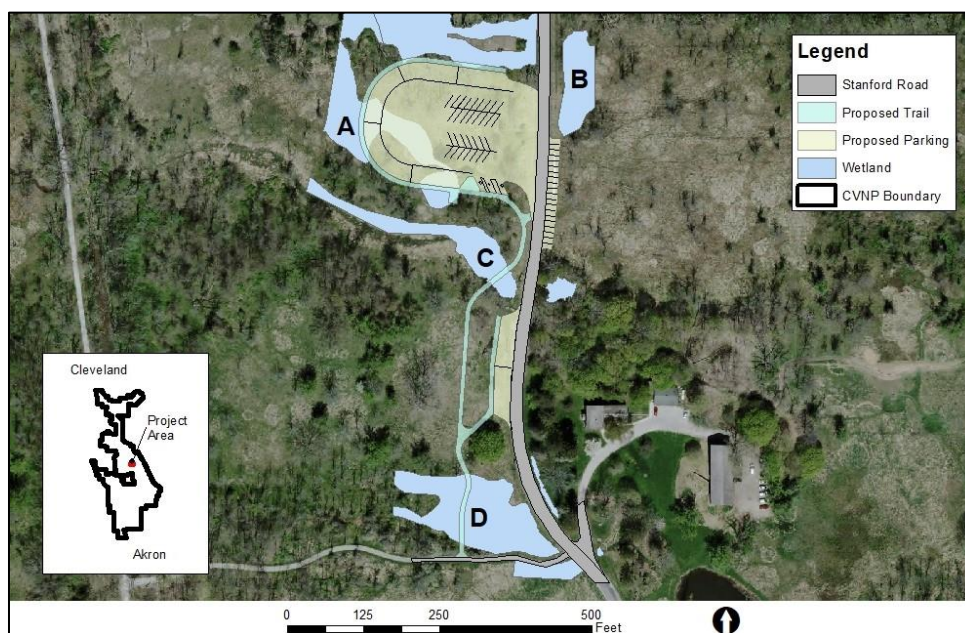


Figure 1. Map of project area indicating location of proposed parking areas, proposed trail, and four wetlands (A, B, C, and D).

Background

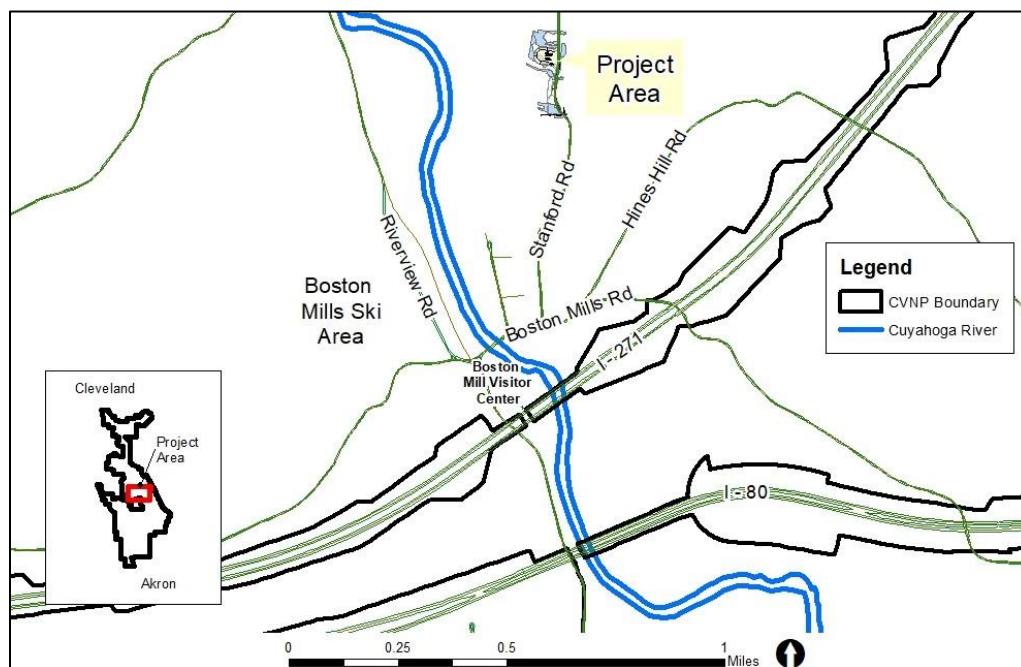
The park was established as a National Recreation Area in 1974 and was re-designated as a National Park in 2000. The Boston Mills area – located about one-half mile south of the project site – supports the park’s primary visitor center, as well as access to the Towpath and other trails, which are used by more than two-million visitors each year. The Cuyahoga Scenic Railroad maintains a train depot in the Boston area, which provides train tours for park visitors. The park also maintains a river-access point east of the visitor center, which is used by many kayakers and canoers from spring through fall. The Boston Mills Ski Resort is located directly west of the visitor center and provides another recreational opportunity for park visitors on snowy days. On busy weekends and summer days, the Boston area is filled beyond capacity with park visitors and their cars.

The Ohio & Erie Canal and associated Towpath Trail is listed as a National Historic Landmark and the Cuyahoga Valley Scenic Railway is listed as a National Historic District on the National Register of Historic Places. In addition, the section of Cuyahoga River running through the park was designated an official, state Water Trail in 2019. All three of these features are popular visitor attractions and are located slightly west of the project area.

PROPOSED ACTION

Project Area

The project site is located about one-half mile north of the park’s main visitor, which is located



at the intersection of Boston Mills Road and Riverview Road (Figures 1 and 2). The location of the proposed parking lot is at the closed, southern end of Stanford Road, which is owned by the NPS.

Figure 2. Map of the project vicinity indicating proximity of major roads and other features.

Project Design & Construction

This project would provide designated parking for approximately 15 horse trailers and 40 cars, including two spaces designated for handicapped accessibility (Figure 1). The total footprint of new asphalt in the project area would cover about 60,000 square feet (1.4 acres), including about 1,400-linear feet of new trails to connect parking areas to the Towpath Connector Trail (located immediately south of Wetland D in Figure 1). Access and staging for construction would occur within the existing, paved right-of-way of Stanford Road at the project site.

OTHER ALTERNATIVES CONSIDERED

Alternative 1 – No Action Alternative

Under the No Action Alternative, additional parking would not be constructed in the project area. Current issues resulting from limited parking, congestion, and circulation issues would continue to be a problem at and near the Boston Mill Visitor Center. Equestrians would continue to be particularly affected, as they would continue to park horse trailers in a lot designated for recreational vehicles west of the Boston Mill Visitor Center and from which they must cross Riverview Road to access equestrian trails in the area.

Alternative 2 – Relocate Parking Area to the North

A disturbed area is located immediately north of the proposed parking lot, which used to support residential homes and associated buildings (Figure 3, inset photo) that were demolished between 2000 and 2015. Park staff evaluated this northern site for construction of the parking lot; however, wetlands recolonized this area after building demolition, and construction of the parking lot on that site – even with alternative configurations – would impact more wetland acreage than construction at the proposed location.



Figure 3. Preferred alternative. Vicinity map indicating alternative locations considered for construction of new parking area on Stanford Road.

Alternative 3 – Relocate Parking Area to the East of Stanford Road

Another disturbed area is located immediately east of the proposed parking lot that was farmed since at least the early 1900s but probably for much longer (Figure 3). Although farming was discontinued in this area decades ago, the area remains relatively open and supports mostly herbaceous vegetation dominated by reed canarygrass. Park staff also evaluated this eastern site for construction of the parking lot; however, wetlands also have recolonized this area since farming was abandoned, and construction of the parking lot on that site – even with alternative configurations – would impact more wetland acreage than at the proposed location.

WETLANDS IN THE PROJECT AREA

Director's Order #77-1: Wetland Protection requires NPS properties to avoid adversely impacting wetlands to the extent possible, and all NPS activities that will impact wetlands must be completed to ensure no net loss of wetlands. *Procedural Manual #77-1: Wetland Protection* provides procedural guidance for the NPS to accomplish this goal.

A wetland delineation was completed in 2021 by the Environmental Design Group, a consulting company, in accordance with the U.S. Army Corps of Engineers' 1987 Wetlands Delineation Manual and associated 2012 Regional Supplement. Park staff also considered wetland guidance presented in NPS

Procedural Manual #77-1: Wetland Protection to determine acreage of wetlands in the project area in coordination with the formal delineation. All wetlands that meet NPS standards in the project area are indicated on Figures 1 and 5. In general, NPS staff only evaluated wetlands in the project area within about 100 feet of project construction, although most wetlands in the area typically extend far beyond limits indicated in the figures.



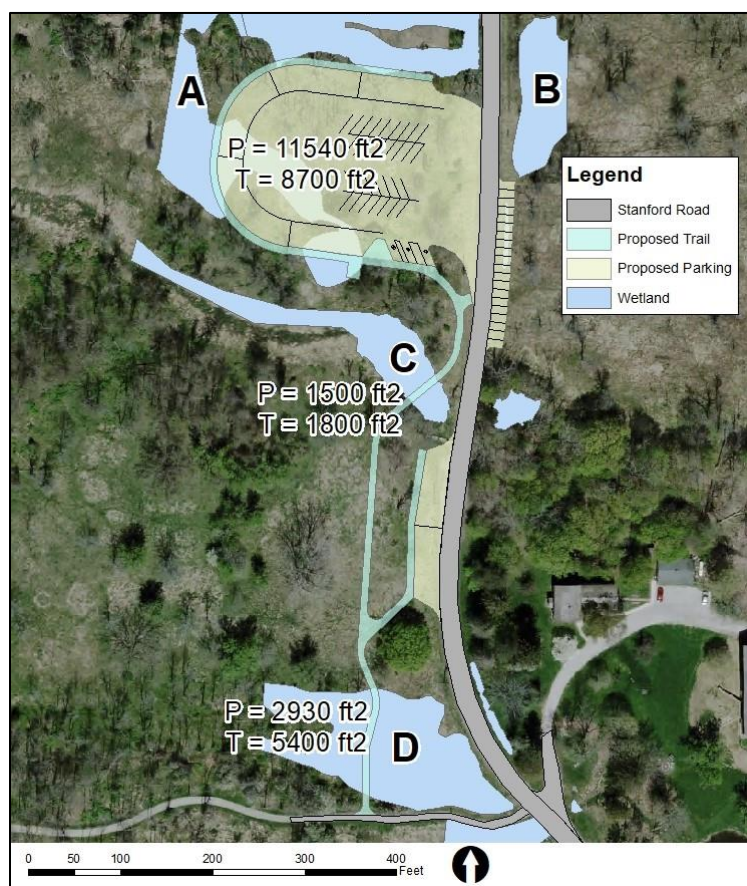
Figure 4. Photo of typical wetland vegetation in the project area in Wetland A (see Figure 1) dominated by reed canarygrass with dead and upland trees in the background.

Wetland vegetation in the project area is dominated by non-native, invasive reed canarygrass (*Phalaris arundinaceae*) with scattered shrubs consisting mostly of non-native multiflora rose

(*Rosa multiflora*) (Figure 4). Upland areas at the site are dominated by non-native grasses (perennial ryegrass, *Lolium perenne*, and Kentucky bluegrass, *Poa pratensis*) with scattered trees and shrubs, including pignut hickory (*Carya glabra*), black walnut (*Juglans nigra*), and autumn olive (*Elaeagnus angustifolia*).

IMPACT ON WETLANDS

Construction of the proposed parking lot on Stanford Road would result in 0.73 acre of wetland impacts (permanent impacts to 0.366 acre of palustrine emergent (PEM) wetlands and temporary impacts to 0.365 acre of PEM wetlands (see Table 1 and Figure 5)). Per standard



construction practice, silt fencing would be installed approximately 30 feet from the edge of construction, and on-site monitoring would ensure construction activities do not extend beyond that fencing.

Permanent impacts would result from permanent placement of fill, rock, concrete, asphalt, and other construction materials in wetlands during construction as indicated in Figures 1, 3, and 5. Temporary impacts would result from temporary activities adjacent to construction activities, such as driving equipment between the edge of pavement and silt fencing.

Figure 5. Wetland impacts associated with proposed parking area (P = permanent impact, T = temporary impact).

Table 1. Wetland Impacts

Wetland ID	Wetland Type	Permanent Impact		Temporary Impact	
		Ft2	Acre	Ft2	Acre
A	PEM	11,540	0.265	8,700	0.200
C	PEM	1,500	0.034	1,800	0.041
D	PEM	2,930	0.067	5,400	0.124
TOTALS 0.73 acre		15,970	0.366	15,900	0.365

MITIGATION

Avoidance Efforts

As described above under “Other Alternatives Considered”, NPS staff evaluated multiple sites for project construction to avoid impacting wetlands to the greatest extent possible. Based on those evaluations, the NPS selected the proposed site as the location that minimizes impacts to wetlands.

Design Measures to Minimize Impacts

As described above under “Project Design & Construction”, staging for this project would occur within the disturbed, paved right-of-way of Stanford Road. All construction areas should be accessible directly from Stanford Road, so wetland matting or timbers shouldn’t be necessary to prevent disturbance to adjacent wetlands for access or construction.

Best Management Practices

Per standard construction practice, the NPS will ensure that silt fencing is installed around the construction site to prevent soil and other construction materials from moving downslope from work areas into adjacent wetlands. In addition, the NPS will ensure that areas that are disturbed temporarily during construction are seeded with an appropriate mix of native meadow plants in upland areas and wetland plants in wetland areas; both mixes may include a short-lived grass, such as cereal rye, that will germinate quickly and provide fast cover. NPS staff also will ensure that any contractor working on site maintains a clean work environment free of trash and debris.

In addition to silt fencing, wetland boundaries will be marked with orange mesh “construction” fencing to indicate areas that shouldn’t be disturbed and to reduce potential for accidental damage. Park staff will inspect the work site regularly (at least weekly), as well as after heavy rains, to ensure silt fencing and construction fencing remain in good condition and are located appropriately to protect wetlands.

Compensatory Mitigation

Construction of the proposed parking lot on Stanford Road will result in a total of 0.73 acre of wetland impacts (permanent impacts to 0.366 acre of PEM wetlands and temporary impacts to 0.365 acre of PEM wetlands (Table 1 and Figure 5)).

In accordance with NPS guidelines and to offset wetland impacts, the NPS will enhance approximately 15 acres of wetlands adjacent to the project area on NPS property, which will result in a compensation ratio of 20:1 (i.e., 20 acres of enhancement for every acre of wetland impact) (Figure 6). The enhancement area will be located immediately west of the project area

between Stanford Run to the north and an unnamed tributary to the Cuyahoga River to the south and bordered to the west by the Towpath Trail.

Existing wetlands in the enhancement area are similar to wetlands in the project area (Figure 3) and are dominated by reed canarygrass with patches of multiflora rose and scattered trees, including green ash (*Fraxinus pennsylvanica*), sycamore (*Platanus occidentalis*), black willow (*Salix nigra*), and standing snags. Park staff collaborated with the U.S. Army Corps of Engineers (Buffalo District) in 2018 to restore Stanford Run to its historic alignment as indicated in Figure 6. Park staff also have worked with volunteers to reforest streamside areas adjacent to Stanford Run with native trees, including sycamore, boxelder (*Acer negundo*), and swamp-white oak (*Quercus bicolor*). However, the understory of reforested areas remains dominated by invasive plants.

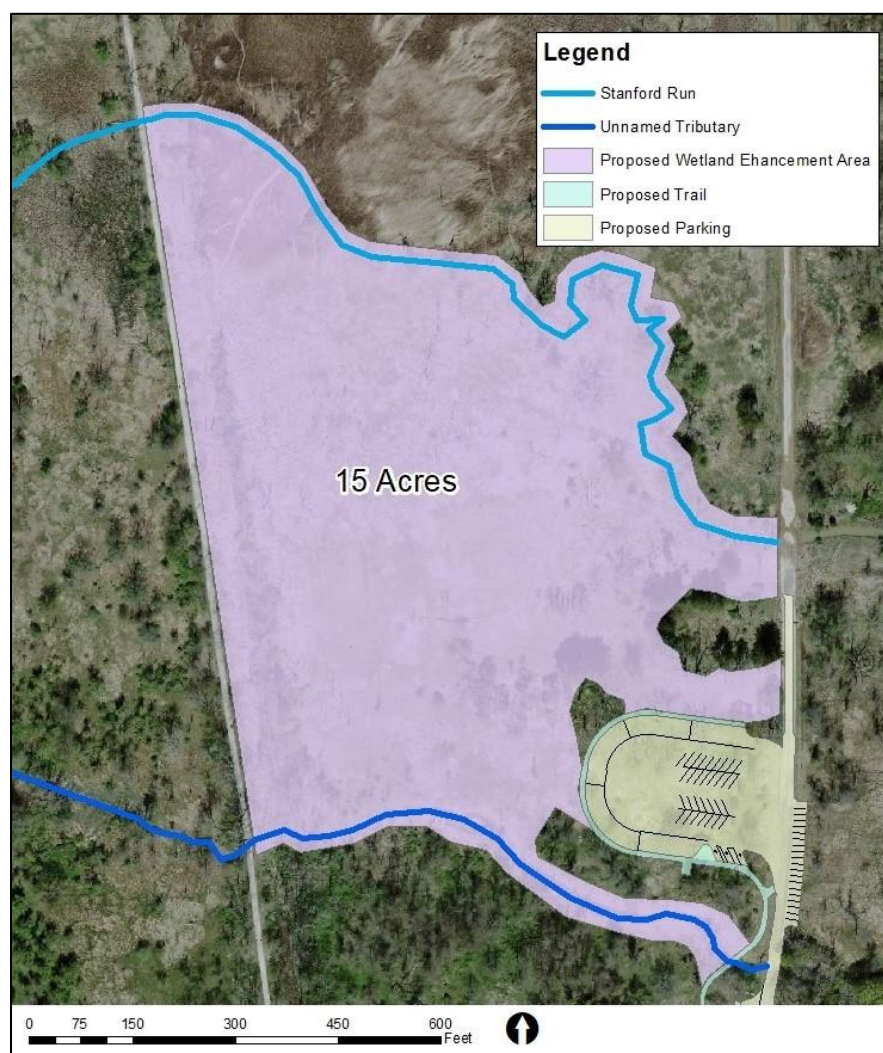


Figure 6. Proposed wetland-enhancement area.

The function and value of existing wetlands in the enhancement area would be improved by transitioning the area from a weedy patch dominated by non-native, invasive plants to a wetland that supports a diverse assemblage of native species.

NPS staff would manage invasive plants in the mitigation area intensively for at least three years beginning in 2024 to transition vegetation from patchy monocultures of non-native species to a mix of native plants. As described above, species of primary concern in the mitigation area include reed canarygrass and multiflora rose, as well as other species such as common reed (*Phalaris arundinacea*), narrow-leaf cattail (*Typha angustifolia*), Canada thistle (*Cirsium canadensis*), and autumn olive. Initial treatment would include foliar spray of targeted species in the enhancement area using a wetland approved herbicide, such as AquaNeat. Subsequent treatments would include hand-wicking or cut-stump treatment of targeted species using a similar herbicide approved for wetland use.

In fall 2025, park staff would begin reseeding the area with a diverse mix of native wetland plants (Table 2), including potential use of a short-lived cover crop, such as cereal rye, to provide quick cover. After managing invasive plants and reseeding with a native mix, park staff will incorporate the mitigation area into their annual work plan to monitor and re-treat non-native vegetation as needed into the indefinite future.

Botanical Name	Common Name
23.20 % <i>Carex vulpinoidea</i>	Fox Sedge
22.00 % <i>Carex lurida</i>	Lurid Sedge
20.00 % <i>Elymus virginicus</i>	Virginia Wildrye
14.00 % <i>Carex scoparia</i>	Blunt Broom Sedge
3.00 % <i>Juncus effusus</i>	Soft Rush
3.00 % <i>Verbena hastata</i>	Blue Vervain
2.00 % <i>Asclepias incarnata</i>	Swamp Milkweed
2.00 % <i>Carex grayi</i>	Gray's Sedge
2.00 % <i>Zizia aurea</i>	Golden Alexanders
1.00 % <i>Aster novae-angliae</i>	New England Aster
1.00 % <i>Juncus tenuis</i>	Path Rush
1.00 % <i>Verbena urticifolia</i>	White Vervain
0.70 % <i>Solidago rugosa</i>	Wrinkleleaf Goldenrod
0.50 % <i>Aster lanceolatus</i>	Lance Leaved Aster
0.50 % <i>Aster puniceus</i>	Purplestem Aster
0.50 % <i>Bidens cernua</i>	Nodding Bur Marigold
0.50 % <i>Carex crinita</i>	Fringed Sedge
0.50 % <i>Lobelia siphilitica</i>	Great Blue Lobelia
0.50 % <i>Mimulus ringens</i>	Square Stemmed Monkeyflower
0.40 % <i>Carex stipata</i>	Awl Sedge
0.40 % <i>Eupatorium perfoliatum</i>	Boneset
0.30 % <i>Helianthus angustifolius</i>	Narrowleaf Sunflower
0.30 % <i>Lycopus americanus</i>	American Water Horehound
0.30 % <i>Scirpus atrovirens</i>	Green Bulrush
0.30 % <i>Scirpus cyperinus</i>	Woolgrass
0.10 % <i>Alisma subcordatum</i>	Mud Plantain
100.00 %	

Table 2. Proposed Seed Mix for Wetland Enhancement

CONCLUSION

The NPS is proposing to construct a new parking facility on Stanford Road to reduce congestion and safety concerns associated with the Boston Mill Visitor Center. The proposed facility will impact 0.73 acre (permanently impact

0.366 acre and temporarily impact 0.365 acre) of low-quality PEM wetlands in the project area that are dominated by non-native, invasive species. To offset these impacts, the NPS will improve the function and value of 15 acres of degraded wetlands adjacent to the project site by transitioning the area to a wetland that supports a diverse assemblage of native plants. This transition will be accomplished by reducing cover of non-native plants in the area and

overseeding with a mix of native species. After enhancing the site, NPS staff will incorporate the mitigation area into its annual work plan and manage the site appropriately to support high-value wetlands in perpetuity in accordance with NPS *Director's Order #77-1: Wetland Protection* and Presidential *Executive Order 11990, Protection of Wetlands*.