Draft Environmental Assessment

Saxon Harbor Campground

Hurley, Iron County, WI
March 29, 2019

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Prepared for
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List of Acronyms, Chemical Formulas, and Abbreviations

AADT–Annual Average Daily Traffic

AIRFA–American Indian Religious Freedom Act

APE–Area of Potential Effect

BMP–best management practices

CAA–Clean Air Act

CaB2–Clarion Loam

CSAH–County State-Aid Highway

CEQ–Council on Environmental Quality

C.F.R–Code of Federal Regulations

CTH A - County Truck Highway A

CO–Carbon monoxide

Df–Dundas Silt Loam

EA–Environmental Assessment

EIS–Environmental Impact Statement

EO–Executive Order

EPA–Environmental Protection Agency

ESA–Endangered Species Act

FEMA–Federal Emergency Management Agency

FIRM–Flood Insurance Rate Map

FONSI–Finding of No Significant Impact

FPPA–Farmland Protection Policy Act

ft msl–feet above mean sea level

Ga–Glencoe Silty Clay Loam

HaB–Hayden Loam

HaB2–Hayden Loam Moderately Eroded

LcB–Lester Loam

LcB2–Lester Loam Moderately Eroded

Ldn–Day-Night Average Sound Level

Lf–Le Sueur-Lester

LOMR–Letter of Map Revision

NAAQS–National Ambient Air Quality Standards

NCA–Noise Control Act of 1972

NEPA–National Environmental Policy Act

NHIS–Natural Heritage Information System

NHPA–National Historic Preservation Act

NOI–Notice of Intent

NO_2–Nitrogen Dioxide

NRCS–Natural Resources Conservation Service

NRHP–National Register of Historic Places

O_3–Ozone

OSHA–Occupational Safety and Health Administration

PA–Public Assistance

Pb–Lead

P.L.–Public Law

PM_{10} Particulate matter

Sb–Land, Hayden-Lester

SHPO–State Historic Preservation Office

SO_2–Sulfur Dioxide

Ta–Terrace Escarpments

THPO–Tribal Historic Preservation Office

Tribes–Native American Tribes

USACE–U.S. Army Corps of Engineers

U.S.C. – United States Code

USDA–U.S. Department of Agriculture

USFWS–U.S. Department of the Interior Fish and Wildlife Service

Wb–Webster-Glencoe Silty Clay Loams

Wc–Webster-Le Sueur Silty Clay Loams

WDNR–Wisconsin Department of Natural Resources

WisDOT–Wisconsin Department of Transportation

List of Tables

Table 1: Federally Protected, Endangered & Threatened Species within Iron County

Table 2: Summary of Environmental Impacts

Table of Contents

SECTION ONE: BACKGROUND 1
1.1 Project Authority 1
1.2 Project Location 1
1.3 Purpose and Need 2
1.4 Existing Facility 3

SECTION TWO: ALTERNATIVE ANALYSIS 3
2.1 Alternative 1 – No Action Alternative 4
2.2 Alternative 2 – Proposed Action, Campground at Area 1 4
2.3 Alternative 3 – Campground at Area 2 6
2.4 Alternatives Considered and Eliminated from Further Consideration 7

SECTION THREE: AFFECTED ENVIRONMENT AND CONSEQUENCES 8
Preliminary Screening of Assessment Categories 8
3.1 Physical Environment 8
3.1.1 Geology, Seismicity and Soils 8
3.1.2 Water Resources and Water Quality 10
3.1.3 Floodplain Management (Executive Order 11988) 12
3.1.4 Air Quality 13
3.1.5 Coastal Zone Management 14
3.2 Biological Environment 14
3.2.1 Terrestrial and Aquatic Environment 14
3.2.2 Wetlands (Executive Order 11990) 15
3.2.3 Threatened and Endangered Species 16
3.3 Socioeconomics 18
3.3.1 Visual Resources 18
3.3.2 Noise 19
3.3.3 Public Services and Utilities 20
3.3.4 Traffic and Circulation 20
3.3.5 Environmental Justice (Executive Order 12898) 22
3.3.6 Safety and Security 23
3.4 Historic and Cultural Resources 24
3.4.1 Historic Structures 25
3.4.2 Archaeological Resources 25
3.4.3 Tribal Coordination and Religious Sites 27
3.5 Comparison of Alternatives 28

SECTION FOUR: CUMULATIVE IMPACTS 33
4.1 Relocation of County Highway A 33
4.2 Dredging 33

4.3 Repairs to the Harbor 33
4.4 Future Projects Near the Site 33

SECTION FIVE: PUBLIC PARTICIPATION 34

SECTION SIX: MITIGATION MEASURES AND PERMITS 34

SECTION SEVEN: CONSULTATIONS AND REFERENCES 37
7.1 Consultations 37
7.2 References 37

SECTION EIGHT: LIST OF PREPARERS 38

APPENDICES 39
Appendix A – Maps and Figures
Appendix B – Photo Log
Appendix C – Agency Correspondence
Appendix D – Tribal Nation Consultation
Appendix E – Public Notice
Appendix F – Public Comments
Appendix G – Technical Reports
Appendix H – Design Review Plan Set for Alternative Number 2

To obtain a copy of this report or portions of it, please contact Duane Castaldi, Regional Environmental Officer, FEMA, 536 South Clark Street, 6th Floor, Chicago, IL 60605-1521, or at duane.castaldi@fema.dhs.gov.

SECTION ONE: BACKGROUND

1.1 Project Authority

During the incident period between July 11 and July 12, 2016, heavy rains resulted in severe flooding in Iron County. Heavy rainfall and overland flooding resulted in the inundation of Saxon Harbor and the surrounding area. Raging waters ripped through the entire facility causing severe erosion. The waters coursed through the campground. Under a major disaster declaration (FEMA-4276-DR-WI) signed by the President on August 9, 2016, Iron County was included in areas within Wisconsin eligible to receive Public Assistance (PA) program funding from the Federal Emergency Management Agency (FEMA). FEMA's PA grant program provides federal assistance to government organizations and certain private nonprofit organizations following a Presidential disaster declaration. Public Assistance is authorized by Section 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288), 42 U.S.C. § 5172. The Iron County Forestry Department applied for funding from FEMA's PA Program to be applied to the costs for relocating the campground (DR-4276-WI, Project Worksheet 149).

In accordance with the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality (CEQ) regulations implementing NEPA (Title 40 Code of Federal Regulations [C.F.R.] Parts 1500 through 1508), FEMA Instruction 108-1-1 and DHS Instruction 023-01-001-01, Rev. 1, FEMA must fully understand and consider the environmental consequences of actions proposed for federal funding. The purpose of this Environmental Assessment (EA) is to meet FEMA's responsibilities under NEPA and to determine whether to prepare a Finding of No Significant Impact (FONSI) or a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the proposed project.

In accordance with federal laws and FEMA regulations, the EA for a proposed federal action must include an evaluation of alternatives and a discussion of the potential environmental impacts. This EA was prepared in accordance with FEMA's regulations as required under NEPA. As part of this NEPA review, the requirements of other environmental laws and executive orders are addressed.

1.2 Project Location

The proposed project location is north of the City of Hurley in Iron County, Wisconsin. The project is the relocation of a public campground located adjacent to Saxon Harbor on Lake Superior's southern shore and Oronto Creek, which joins Parker Creek and from there drains into Lake Superior. The approximate latitude and longitude of the project area is 46.558883, -90.439129. Appendix A presents a Site Location Map as Figure 1.

The campground serves a community of approximately 5,916 Iron County residents (2010 census). On a busy weekend, approximately 2,000 visitors visit Saxon Harbor and spend on average approximately $83 daily throughout the community. The campground consists of four regions: a main campground, Northern lot, South Harbor lot, and East Harbor Lot (Appendix A, Figure 2). The main campground area, west of County Road A, included 27 campground sites. The South Harbor

lot, south of the Harbor and east of County Road A, included 6 campground lots. The Northern lot, located on the peninsula between the north basin and Lake Superior, included 5 tent sites. Finally at the East Harbor lot, a rustic walk-in site located at the confluence of Oconto and Parker Creek accessible only by a footbridge, included 5 tent sites. Due to the 2016 storm event, 26 of the 43 sites were damaged.

1.3 Purpose and Need

The Saxon Harbor Marina and Campground is managed by Iron County Forestry and Parks and has long served as a recreational destination that includes lake and trout stream fishing, beaches, a marina, and campground facilities. Prior to damage to Saxon Harbor caused by storms in July of 2016, it is estimated that busy summer weekends would see upwards of 2,000 visitors, and the average daily spending in Iron County by this user group is around $83 per person. Annual revenues to Iron County Forestry and Parks (Forestry and Parks) from camping and boating activities averaged around $124,000, funding 50% of the total county parks annual budget (SmithGroupJJR, 2018). The campground provided opportunities for visitors and community members alike to enjoy the harbor and the town, and associated fees contribute to Forestry and Parks income. These visitors use the restaurants, grocery stores, and small businesses within the area. This economic activity ultimately benefits all residents.

Several storm events in July 2016 resulted in extensive damage to most of the Saxon Harbor facilities. Aerial images of the damage can be found in Attachment A, on Figure 4. The storm events washed out native vegetation throughout the facility and damaged all the docks, the harbor bathrooms, the main campground area and playground, the north campground lot and west campground lot. In addition, the bridge on County Road A (CTH A) that carried traffic across Oronto Creek to the campground and marina was washed out by flooding.

The purpose of the project reviewed in this EA is to address post-disaster conditions at the main campground and related campground facilities to the south. These damages rendered the campsites unusable, thereby making a significant recreational feature of Iron County's Saxon Harbor complex unavailable for public use. The loss of these facilities has resulted in a corresponding loss in income to Forestry and Parks, as well as the incidental economic activity generated by tourism. In addition, damage to Oronto Creek has threatened the habitat for trout, which made Saxon Harbor a destination for recreational trout fishing.

Restoration of the destroyed camping facilities is complicated by the fact that the damaged Main Campground site is located within the Oronto Creek floodplain. Current Wisconsin Department of Natural Resources (WDNR) policy and Iron County Zoning Regulations prohibit rebuilding the campground within the floodplain. Therefore, the action alternatives presented in this EA would mitigate flooding of the campground by relocating the campground south of Oronto Creek.

The project need is to address the loss of recreational facilities caused by the disaster event and to restore aquatic and terrestrial habitat near the original main campground, the proposed relocated

campground facility, and a downstream section of Oronto Creek. The main needs may be summarized as follows:

1. Restoring recreational campsites accessible by car and recreational vehicles (RVs) with access to Saxon Harbor;
2. Restoring suitable campsite amenities to match or exceed those available before the July 2016 event; and
3. Restoring Oronto Creek's ability to support trout populations suitable for recreation fishing by improving water quality and reducing soil erosion and sedimentation.

Addressing these needs will result in reestablishing not only the recreational facilities, but the benefits of economic activity that those facilities bring to Iron County and surrounding communities.

1.4 Existing Facility

Saxon Harbor was established in 1856, serving as a port for the Iron Range. Over the years the port was abandoned and a campground was constructed to increase visitor usage of the Harbor and environmental outreach. Currently, it is a picturesque viewpoint and tourist attraction for Iron County which provides conservation and environmental outreach for the community.

Pre-disaster, Saxon Harbor Campground had 43 campsites – 33 with electrical service, 5 lakeside tent sites, and 5 secluded walk-in tent sites. The campground also had a playground south of the harbor, water available at the main and south campground, restrooms at the harbor and campground, showers, dump station, and a pavilion with kitchen facility available to rent. ATV trails can be accessed from Saxon Harbor. The main campground was located north of the Oronto Creek to the west of CTH A along the Harbor. Secondary campground sites are located further south along the CTH A Road with walking paths and foot bridge access to the Harbor amenities.

Post-disaster, the main campground, including 26 sites, was destroyed along with amenities including playground and restroom facilities. Due to the disaster, all campground facilities have been closed to visitors until they can be repaired and replaced. Additionally, Country Road A bridge was washed out with the 2016 storm making the sites and harbor inaccessible to the public. Photos of the damage can be found in Appendix B - Photo Log.

SECTION TWO: ALTERNATIVE ANALYSIS

Following the NEPA process, all reasonable alternatives to the Proposed Action were analyzed by Iron County. The design criteria and project purpose developed by the *Schematic Design Report* (Appendix G) were used in the technical and economic feasibility evaluation of each action alternative. Three alternatives were deemed technically and economically feasible and are detailed below. Non-feasible alternative actions are summarized in Section 2.5 but are not further considered within this EA.

2.1 Alternative 1 – No Action Alternative

Under the No Action Alternative, the campground would be permanently closed to the public with unrestored bare soils open for future erosion. Visitors would be unable to use the campground causing the community of Saxon Harbor to be economically impacted. Due to the project location remaining in the floodplain, the WDNR and Iron County Zoning will not issue permits for reconstruction of the facilities. Without fill and grading of the site of the former campground, included in both of the following action alternatives, the erosion at the site will continue to impact the fisheries in Saxon Harbor and have an adverse impact on fish and wildlife habitat. This option does not address the needs identified in Section 1.3. by taking no action, campground facilities will not be restored, and erosion will continue to impair the qualities of Oronto Creek that make it suitable for trout fishing.

2.2 Alternative 2 – Proposed Action, Campground at Area 1

The Proposed Action Alternative 2 involved work in three separate locations: fill and grading of the former campground site, relocation of the Saxon Harbor Campground to Area 1, and grading and stabilizing the bluff east of the new campsite to protect the fishery and water quality of Oronto Creek.

Fill and grading of the abandoned campsite includes the following actions:

- Restore grade through excavation to stable topography, approximately 1,200 cubic yards.
- Restore grade through spreading earthwork to stable topography, approximately 5,600 cubic yards.
- Installing rip rap for Oronto Creek slope stabilization.
- Excavation of old Campground playground and finish grading, 1,000 cubic feet.
- Final grade landscaping to add native vegetation.
- Final grade erosion and sediment control with a jute mesh and seeding of 3,860 square yards.

This work would help control erosion that would otherwise impair Oronto Creek's ability to serve as suitable habitat for trout, in turn restoring its pre-disaster function as a recreational venue for sport fishing.

Construction of the new campsite along CTH A south of Oronto Creek involves replacing and expanding the existing 6 site campground area to 33 campsites. This proposed alternative provides the greatest number of campsites with the least disturbance to the forested area. A preliminary design of the proposed action is attached in Appendix H. This project area covers approximately 7.7 acres, and design considerations and requirements for the campground restoration and reconstruction are outlined in the *Draft Saxon Harbor Marina and Campground Schematic Design Report (Schematic Design Report)* (SmithGroupJJR, 2018), found in Attachment G. The following amenities are proposed:

- Target 33 total campsites, including RV campsites with driveways, restrooms.

- Optimal size of standard campsites is 65 feet by 16 feet, greater than the minimal length for a Class A campsite, 45 feet in length, with appropriate grading for drainage.
- Three (3) ADA accessible campsites within 400 feet of a restroom facility and potable water source.
- Water and electrical hookups.
- Restroom and shower building with three toilets per gender.
- Playground area near the campground.
- Picnic tables.
- Fire rings.

The scope of work for the relocation of Saxon Harbor Campground includes:

- Demolition work to remove the existing standing buildings at the South Site. Demolition will be completed with FEMA authorization with the following conditions:
    - Acquire all necessary permits prior to demolition.
    - Implement best practices from demolition, asbestos and lead abatement.
    - Render properties safe and secure after demolition.
- Earth work to include clearing and grubbing of 16,000 square yards, excavating 96,000 cubic yards, compacting and stabilization of 6,000 cubic yards.
- Installation of temporary access for construction purposes on the east side of the proposed campground site.
- Installation of three culverts and catch basins for storm water.
- The existing west channel of the non-navigable stream is routed through the center of the campground loop, which provides a natural feature as well as potential storm water treatment and additional privacy spacing between the campsites.
- Utilities, such as electricity and water, will need to be installed in the campground. These utilities will be available for RV hook ups and the restroom facilities.
- Utilize best management practices (BMPs) for erosion control, including rock construction entrances, silt fences, bio logs, erosion control blankets and mats.

This campground would accommodate 33 total campsites. Layout of the campground can be found in Appendix H. Construction would take approximately 12 months, and the result would be the restoration of campground facilities at the Saxon Harbor complex.

The final action in Alternative 2 involves stabilizing the bluff east of the proposed campground to provide for erosion control. This action would protect the water quality and trout habitat in Oronto Creek, in turn restoring its pre-disaster function as a recreational venue for sport fishing. That work includes:

- Clearing and excavation of approximately 18,000 cubic yards of bluff east of the proposed campground.
- 100 square yards of rip rap stabilization.
- Plant native vegetation to final grade.
- Utilize best management practices (BMPs) for erosion control, including rock construction entrances, silt fences, bio logs, erosion control blankets and mats.

2.3 Alternative 3 – Campground at Area 2

Alternative 3, similar to Alternative 2, locates the campground south of Oronto Creek, but splits the campsite into two pods along CTH A and at the confluence of Oronto and Parker Creeks. Work involved would include: fill and grading of the former campground site, relocation of the Saxon Harbor Campground to Area 1, construct improved and widened road, and grading and stabilizing the bluff east of the new campsite to protect the fishery and water quality of Oronto Creek.

Fill and grading of the abandoned campsite includes the following actions:

- Restore grade through excavation to stable topography, approximately 1,200 cubic yards.
- Restore grade through spreading earthwork to stable topography, approximately 5,600 cubic yards.
- Installing rip rap for Oronto Creek slope stabilization.
- Excavation of old Campground playground and finish grading 1,000 cubic feet.
- Final grade landscaping to add native vegetation.
- Final grade erosion and sediment control with a jute mesh and seeding of 3,860 square yards.

Construction of the new campsite along CTH A south of Oronto Creek involves, replacing and expanding the existing 6 site campground area to 30 total campsites. This project area covers approximately 7.5 acres. The scope of work for the relocation of Saxon Harbor Campground includes:

- Demolition work to remove the existing standing buildings at the South Site. Demolition will be completed with FEMA authorization with the following conditions:
    - Acquire all necessary permits prior to demolition.
    - Implement best practices from demolition, asbestos and lead abatement.
    - Render properties safe and secure after demolition.
- Earth work to include clearing, grubbing, and excavating of approximately 5.3 acres.
- Stabilization with erosion control measures of approximately 5.3 acres.
- Installation of temporary access for construction purposes on the east side of the proposed campground site.
- Installation of three culverts and catch basins for storm water.
- The existing west channel of the non-navigable stream is routed through the center of the campground loop, which provides a natural feature as well as potential storm water treatment and additional privacy spacing between the campsites.
- Utilities, such as electricity and water, will need to be installed in the campground. These utilities will be available for RV hook ups and the restroom facilities.
- Utilize best management practices (BMPs) for erosion control, including rock construction entrances, silt fences, bio logs, erosion control blankets and mats.

However, the access road will need to be improved and widened to allow two-way RV traffic. This alternative would include:

- excavating and grading,
- installing water and electricity utility lines,
- installing culverts,
- clearing and grubbing,
- expanding and paving the access road, and
- riprap and slope stabilization.

The final action in Alternative 3 involves stabilizing the bluff east of the proposed campground to provide for erosion control. This action would protect the water quality and trout habitat in Oronto Creek, in turn restoring its pre-disaster function as a recreational venue for sport fishing that work includes:

- Clearing and Excavation of bluff east of the proposed campground.
- 100 square yards of Rip Rap Stabilization.
- Plant native vegetation to final grade.
- Utilize best management practices (BMPs) for erosion control, including rock construction entrances, silt fences, bio logs, erosion control blankets and mats.

Layout of the campground can be found on Figure 5 of Appendix A developed by SmithGroup (formerly "SmithGroupJJR"). Construction would take approximately 12 months.

2.4 Alternatives Considered and Eliminated from Further Consideration

There are two alternatives that were considered, deemed not feasible, and eliminated from further consideration. The first of these was to restore the flooded campground. This alternative would require raising the ground surface 5 feet to an elevation above the FEMA floodplain elevation. This alternative was eliminated from further consideration because of the potential adverse impact on Saxon Harbor habitat and construction within the floodplain.

The other alternative considered but eliminated was to develop a rustic campground on the hills overlooking the harbor. This alternative was eliminated from further consideration because its proposed access road would be within a wetland and near an active eagle nest. Additionally, access would not be possible for RV campers, therefore, not meeting the project need for RV access. Approximately 2,800 feet of road with base, culverts, and surfacing would need to be installed to allow access for all vehicles. Building this road would require the clearing of trees to create campsites and walkways, which would result in significant impacts to wildlife habitat. In addition, due to the varying grades between the campsites and the marina, this alternative posed logistic challenges to constructing walkways compliant with the requirements of the Americans with Disabilities Act. These considerations resulted in the elimination of this alternative from further analysis.

Preliminary Screening of Assessment Categories

A preliminary screening of assessment categories narrowed the list of categories for which detailed assessments will be performed. The screening was based on readily available information on the proposed project and project area. The assessment categories that were identified as not applying to the proposed project or the project area include Coastal Barrier Resources, Hazardous Materials, and Zoning and Land Use.

Saxon Harbor is not located within a Coastal Barrier Resource System as shown on Figure 7 of Appendix A. For this reason, this category has been eliminated.

With regard to hazardous materials, during a site walk of the project area on May 25, 2017, a visual inspection was performed to observe the presence or absence of potential contamination of the project area. No signs of soil or vegetation staining, chemical containers or empty drums were observed. A photographic log presenting observations is presented in Appendix B.

Before the disaster event, Saxon Harbor Marina had a refueling dock. However, the marina itself is outside the project area for the work being reviewed under this EA. A review of the WDNR Bureau for Remediation and Redevelopment Tracking System website indicates that there are no current or former remediation sites in the project area. Figure 10 of Appendix A presents the search results and indicates the closest sites with current or former contamination, apart from the refueling dock at the marina, are 4.6 miles away from the proposed project. Although a Phase 1 EA has not been performed for the project area, hazardous materials are not anticipated to be present because they are not consistent with historical or current land use, no obvious signs of contamination were observed, and there are no contaminated sites near the project area. For these reasons, the Hazardous Materials assessment category has been eliminated.

No changes to zoning and land use will result from implementation of this project. The area has long been zoned as Forestry, with forestry as the identified primary land use. However, due to the development of recreational uses at the marina, campground, and surrounding areas, the decision was made prior to the 2016 storms to adjust the land use designation of Saxon Harbor and its various facilities, including the campground, from forestry to recreational. Because the alternatives presented here require no change to Zoning and Land Use, that category has been eliminated.

3.1 Physical Environment

3.1.1 Geology, Seismicity and Soils

The proposed project location is within the Lake Superior Lowlands physiographic province, which extends 5 to 20 miles inland from Lake Superior. The lowland is separated from the Northern Highlands province to the south by the Penokee-Gogebic Range. The Lake Superior Lowlands are characterized by a plain gently sloping to the north, toward Lake Superior. Elevations range from approximately 610 feet above mean sea level (ft msl) to approximately 700 ft msl. Rivers drain the

lowland, carrying surface water runoff toward Lake Superior. Due to the nature of the unconsolidated underlying geologic units, surface water drainages, like Oronto Creek, have incised the plain, leaving behind rolling hills with moderate to steep slopes. The proposed project location lies at approximately 620 ft msl (National Geodetic Vertical Datum).

The lowland plain comprises sediments deposited by glaciers and sediments deposited in front of the glacier (proglacial) during Pleistocene and pre-Pleistocene periods of deposition. The uppermost surficial unit is the Miller Creek Formation, which is predominantly clayey till deposited beneath the glacier, and silty to sandy proglacial meltwater stream and lake deposits. The ice margin advanced and retreated multiple times and proglacial lakes filled and drained multiple times during the past 30,000 years to create complex, interbedded till and lake deposits. The Miller Creek Formation is underlain by the older Copper Falls Formation, which comprises silty and sandy till that is generally reddish-brown, with a small proportion of Paleozoic sedimentary clasts. Where adjacent to Lake Superior, the Copper Falls is typically exposed in wave-cut bluffs. The clayey overlying Miller Creek caps the bluffs, except where surface water drainages have incised through the Miller Creek, creating slopes of 10˚ to 15˚ (Clayton, 1984). In the proposed project area, glacial features have been subdued by lake wave action. The occurrence of clay-capped, sloped hills and wave action are conducive to rapid short-term erosion during storm events and slower long-term erosion during less severe, typical conditions.

The proposed project location within the Lake Superior Lowlands is seismically stable, with folding, faulting and erosion occurring during deposition of the sandstone bedrock sequence during the Cambrian period (Thwaites, 1912), between approximately 540 and 485 million years ago. Because of this seismic stability, the requirements of Executive Order (EO) 12699, Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction, do not apply to the proposed project.

Soils have developed on the underlying geologic units as described above. Appendix G, Attachment 2 includes a soil map based on a U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) survey (USDA, 2018) completed in May 2018. There are predominantly six soil types shown in the project area. Soil classifications, prime or unique, slope, depth, erodibility, and stability for each soil type are summarized within Appendix G. Of the six soil types, Gichigami-Oronto complex soils are considered prime farmland.

The Farmland Protection Policy Act (FPPA) (Pub. Law 97-98, Sec. 1539-1549 codified at 7 U.S.C. § 4201 et seq.) was enacted in 1981 to minimize the unnecessary conversion of farmland to non-agricultural uses resulting from federal actions. Programs administered by federal agencies must be compatible with state and local farmland protection policies and programs. The NRCS is responsible for protecting significant agricultural lands from irreversible conversions that result in the loss of an essential food or environmental source.

Prime farmland is characterized as land with the best physical and chemical characteristics for the production of food, feed, forage, fiber and oilseed crops (USDA, 1989). This land is either used for food or fiber crops or is available for those crops, but is not urban, built-up land, or water areas. The NRCS has determined that Unit 444B–Gichigami-Oronto complex soils are considered

farmlands of statewide importance. South of Oronto Creek within the Area of Intent, there are approximately 30 acres of Gichigami-Oronto soils.

The Farmland Conversion Impact Rating assesses non-soil related criteria, such as the potential for impact on the local agricultural economy if the land is converted to non-farm use and compatibility with existing agricultural use. The rating results in a score of up to 260 points, with the higher the number indicating the greater the need to consider the protection of the site as farmland. Sites receiving a total score of less than 160 need not be given further consideration for protection and no additional sites need to be evaluated.

Alternative 1 – No Action

Under the No Action alternative, no adverse impacts to the geology, seismicity, and soils are anticipated. However, if the original campground site is not restored, there is potential for increased erosion from future storms.

Alternative 2 – Proposed Action, Campground at Area 1

There is no anticipated impact to geology or seismicity from this project alternative.

Area includes soils protected under the FPPA. The Farmland and Conversion Impact Rating, found in Attachment 1 of Appendix C, was completed in June 2018, resulting in a site rating of 144. Therefore, the site requires no further consideration for protection as farmland and no additional sites need to be evaluated.

Subrecipient will implement BMPs as required by permits to minimize soil erosion and storm water runoff during construction. The proposed measures include minimizing the disturbed area, maintaining vegetative cover, and providing inlet protection, silt fencing and erosion matting.

Alternative 3 – Campground at Area 2

There is no anticipated impact to geology or seismicity from this project alternative.

Soils found at the Campground Area 2 are similar to the soil composition found at Campground Area 1. This area includes soils protected under the FPPA. The Farmland and Conversion Impact Rating, found in Attachment 1 of Appendix C, was completed in June 2018, resulting in a site rating of 144. Therefore, the site requires no further consideration for protection as farmland and no additional sites need to be evaluated.

Subrecipient will implement BMPs as required by permits to minimize soil erosion and storm water runoff during construction. The proposed measures include minimizing the disturbed area, maintaining vegetative cover, and providing inlet protection, silt fencing and erosion matting.

3.1.2 Water Resources and Water Quality

Water resources include surface water, groundwater, stormwater, and drinking water (wetlands are discussed in Section 3.2.2). The project area is along Parker Creek, Oronto Creek, and Lake Superior.

The Clean Water Act (CWA) of 1977, 33 U.S.C. § 1251 et seq., regulates discharge of pollutants into water, with various sections falling under the jurisdiction of the U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (EPA). Section 404 of the CWA establishes the USACE permit requirements for discharging dredged or fill materials into waters of the United States and traditional navigable waterways. USACE regulation of activities within navigable waters is also authorized under the Rivers and Harbors Act of 1899, 33 U.S.C. § 403 et seq. Under the National Pollutant Discharge Elimination System, EPA regulates both point and non-point pollutant sources, including stormwater and stormwater runoff. Activities affecting waters would be regulated under both the CWA and the Rivers and Harbors Act.

During a site walk of the project area on May 25, 2017, surface water resources were observed and photographed. A photographic log presenting observations is presented in Appendix B. The primary surface water bodies in the project area include Oronto Creek, Parker Creek, and Lake Superior. Oronto and Parker Creeks drain to the north, to Lake Superior, as shown on Figures 1 and 2 of Appendix A. Lake Superior is the largest freshwater lake in the world covering a surface area of 31,700 square miles with 2,725 miles of shoreline. Lake Superior serves as a regional drinking water source and is home to over 80 different fish species (Minnesota Sea Grant). The site is located within the Montreal watershed. Land use in the Montreal watershed is primarily forest (70%), wetland (22.70%) and a mix of open (3.10%) and other uses (4.10%). This watershed has 382.88 stream miles, 1,369.22 lake acres and 30,742.44 wetland acres. Because of this habitat diversity, Saxon Harbor is home to several fish habitats.

Alternative 1 – No Action

Under the No Action alternative, no adverse impacts to surface waters are anticipated, though water quality may degrade due to continued erosion.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, no significant impacts are expected. All runoff from impervious surfaces would be treated onsite by being directed to storm water basins prior to discharge. The slope stabilization will prevent erosion and transport of sediment of the bluff south of Oronto Creek. During construction, appropriate BMPs would be installed (e.g., erosion control barriers, minimization of bare soil areas, revegetation of bare soils) in order to reduce transport of sediment. Additionally, because the existing west channel of the non-navigable stream is routed through the center of the campground loop, potential impacts include a developing ecosystem for the stream and altering the water table in the stream aquifer. The non-navigable stream will maintain flow and water quality and will not impact Oconto Creek.

Alternative 3 –Campground at Area 2

Under this alternative, no significant impacts are expected. All runoff from impervious surfaces would be treated onsite by being directed to storm water basins prior to discharge. The slope stabilization will prevent erosion and transport of sediment of the bluff south of Oronto Creek. During construction, appropriate BMPs would be installed (e.g., erosion control barriers, minimization of bare soil areas, revegetation of bare soils) to reduce transport of sediment. Additionally, because the existing west channel of the non-navigable stream is routed through the

center of the campground loop, potential impacts include a developing ecosystem for the stream and altering the water table in the stream aquifer. The non-navigable stream will maintain flow and water quality and will not impact Oconto Creek.

3.1.3 Floodplain Management (Executive Order 11988)

EO 11988, Floodplain Management, requires federal agencies to act to minimize occupancy and modification of the floodplain. Specifically, EO 11988 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 C.F.R. Part 9. Based on the floodplain map provided by FEMA (Appendix A, Figure 6), published in 1978, the current campground site is located within the floodplain and therefore cannot be funded from federal agencies for reconstruction. Iron County is currently completing the Conditional Letter of Map Revision (CLOMR) based on direction from WDNR. Figure 14 of Appendix A is the proposed map revision showing the new floodplain boundary based on hydraulic modeling of the area with new CTA bridge alignment. The CLOMR submittal is currently under review by FEMA and identified as 18-05-3441R. The CLOMR submittal shows flood heights along Oronto Creek from 611.2 at the downstream side of CTH A to 605.9 at the confluence with Lake Superior.

Alternative 1 – No Action

Under No Action alternative, no adverse impacts to the floodplain are anticipated. The campground would not be reconstructed within the current floodplain. However, without restoring the shore and protecting it from future storms, future erosion of the shoreline is possible. The floodplain will continue to evolve in this area through natural processes.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, no floodplain impacts are anticipated. This project location is not within the 100-year floodplain (or 500-year floodplain for critical facility) as indicated in the FIRM (Flood Insurance Rate Map) and corresponding conversion letter, panel # 5501820001B for Iron County (Appendix A, Figure 6), effective date April 1, 1988. Comparing aerial images of pre-storm and post-storm events (Appendix A, Figures 3 and 4), Alternative 2 area was not impacted by the 2016 July storms. It is expected that this proposed location shall continue not to be impacted by flooding as all campsites will be constructed above the respective Base Flood Elevations along Oronto Creek and Lake Superior. Both the 1978 FIRM and the proposed map revision show the proposed campground site to be outside of the floodplain.

Alternative 3 – Campground at Area 2

Under this alternative, no floodplain impacts are anticipated. This project location is not within the 100-year floodplain (or 500-year floodplain for critical facility) as indicated in the FIRM and corresponding conversion letter, panel # 5501820001B for Iron County (Appendix A, Figure 6), effective date April 1, 1988. Comparing aerials of pre-storm and post-storm events (Appendix A, Figures 3 and 4), Alternative 3 area was not impacted by the 2016 July storms. It is expected that this location shall continue not to be impacted by flooding as all campsites will be constructed above the respective Base Flood Elevations along Oronto Creek and Lake Superior. Both the 1978

FIRM and the proposed map revision show the proposed campground site to be outside of the floodplain.

3.1.4 Air Quality

The Clean Air Act (CAA), 42 U.S.C. § 7401 et seq., requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The CAA established two types of national air quality standards; primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly; and secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation and buildings. Under the CAA, current criteria pollutants are: Carbon Monoxide (CO), Nitrogen Dioxide (NO_2), Ozone (O_3), Lead (Pb), Particulate Matter (PM_{10}), and Sulfur Dioxide (SO_2).

The U.S. Environmental Protection Agency's Green Book provides detailed information about the NAAQS designations, classifications and non-attainment areas. According to the Green Book (https://www3.epa.gov/airquality/greenbook/mapnpoll.html), the project area is not located in a non-attainment area.

Alternative 1 – No Action

Under No Action alternative, no adverse impacts to the air quality are anticipated because construction would not occur.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, temporary, minor air quality impacts are anticipated as a result of construction on the parcel. To reduce these impacts, the project proponent would require construction contractors to water down construction areas as necessary to reduce the risk of fugitive dust and maintain factory-installed emissions controls on their equipment that meet state emissions standards. Although emissions from fuel-burning equipment could increase the levels of some criteria pollutants, these increases would be temporary, and equipment would not be running unless necessary for construction.

Alternative 3 – Campground at Area 2

Under this alternative, temporary, minor air quality impacts are anticipated as a result of construction on the parcel. To reduce these impacts, the project proponent would require construction contractors to water down construction areas as necessary to reduce the risk of fugitive dust and maintain factory-installed emissions controls on their equipment that meet state emissions standards. Although emissions from fuel-burning equipment could increase the levels of some criteria pollutants, these increases would be temporary, and equipment would not be running unless necessary for construction.

3.1.5 Coastal Zone Management

The Coastal Zone Management Act (CZMA), 16 U.S.C. § 1451 et seq., enacted in 1972, was established to preserve, protect, develop, and where possible, restore or enhance the resources of the nation's coastal zone. Section 307 of the CZMA requires federal actions, within or outside of the coastal zone, to be consistent with the enforceable policies of a state's federally approved coastal management program (National Oceanic and Atmospheric Administration 2018). The Wisconsin Department of Administration is responsible for managing the Wisconsin Coastal Management Program. Wisconsin has developed a "Strategic Vision for the Great Lakes" that focuses on variety of impacts to the Great Lakes including water quality, economic and community development, and recreational uses among others.

In Wisconsin, the coastal zone includes the entire County boundary of any County touching the shoreline of Lake Michigan and Superior, including Green Bay. The project area lies within the Wisconsin Coastal Zone along Lake Superior.

Alternative 1 – No Action

Under No Action alternative, no adverse impacts to the coastal zone are anticipated because construction would not occur.

Alternative 2 – Proposed Action, Campground at Area 1

Consultation with Ms. Kathleen Angel of the Wisconsin Coastal Management Program in 2017 indicated that a consistency review was not required for the original proposed scope for this alternative and that any concerns would be covered through the permitting process. FEMA contacted Ms. Angel in 2018 noting adjustments to the scope which shifted work away from the coast of Lake Superior. Documentation is provided in Attachment 5 of Appendix C, Agency Correspondence. Adverse impacts to the Coastal Zone are not anticipated, but the project should have several clear benefits to water quality, recreational uses, and community engagement.

Alternative 3 – Campground at Area 2

The location of this alternative with regards to the Lake Superior Coastal Zone is essentially identical to that of Alternative 2. Due to the essentially identical locations of Alternative 2 and Alternative 3, Alternative 3 is not likely to require a consistency review by the Wisconsin Costal Management Program. Impacts to the Coastal Zone by Alternative 3 are not anticipated. Any concerns about the impact of Alternative 3 on the Wisconsin Costal Zone along Lake Superior would be addressed through the permitting process.

3.2 Biological Environment

3.2.1 Terrestrial and Aquatic Environment

The project location is within an area south of the Oronto Creek with severe bluffs and forested areas zoned "F1, Forestry," as shown on Figure 13 of Appendix A. Oronto Creek is a local trout fishing spot. The habitat types include a combination of hardwood swamp and upland in the area of direct impacts. Within a buffer area providing an area of potential secondary impacts are hardwood swamp, floodplain forest, shrub-carr, wet meadow, emergent marsh, and open water

communities. More information can be found in the Saxon Harbor Campground Wetland Rapid Assessment, provided in Attachment 4 of Appendix G.

Alternative 1 – No Action

Under No Action alternative, continued erosion of the creek embankments and shoreline may cause impacts to Oronto Creek, Lake Superior, and adjacent wetlands.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, due to the vegetation removal needed to construct in Area 1, construction activities may cause some temporary impacts to the terrestrial and aquatic environments. Potential impacts include alteration of topography, vegetation removal, erosion, sedimentation, soil compaction, and inundation. These impacts would be temporary, ending when construction activities conclude. Terrestrial and aquatic environments will be protected against potential impacts during construction. Native grasses and vegetation will be planted throughout disturbed areas. In the long term, reduced erosion and excessive sedimentation are expected to have positive impacts to nearby waters, wildlife, and fisheries.

Subrecipient will implement BMPs as required by permits to minimize soil erosion and storm water runoff during construction. The proposed measures include minimizing the disturbed area, maintaining vegetative cover, and providing inlet protection, silt fencing and erosion matting.

Alternative 3 – Campground at Area 2

Under this alternative, due to the vegetation removal needed to construct in Area 2, construction activities may cause some temporary impacts to the terrestrial and aquatic environments. Potential impacts include alteration of topography, vegetation removal, erosion, sedimentation, soil compaction, and inundation. These impacts would be temporary, ending when construction activities conclude. Terrestrial and aquatic environments will be protected against potential impacts during construction. Native grasses and vegetation will be planted throughout disturbed areas. In the long term, reduced erosion and excessive sedimentation are expected to have positive impacts to nearby waters, wildlife, and fisheries.

Subrecipient will implement BMPs as required by permits to minimize soil erosion and storm water runoff during construction. The proposed measures include minimizing the disturbed area, maintaining vegetative cover, and providing inlet protection, silt fencing and erosion matting.

3.2.2 Wetlands (Executive Order 11990)

EO 11990, Protection of Wetlands, requires federal agencies to take action to minimize the loss of wetlands. The NEPA compliance process requires federal agencies to consider direct and indirect impacts to wetlands, which may result from federally-funded actions. Results from information gathered from the National Wetland Inventory Map and WDNR Wetland Inventory Map are provided on Figures 8 and 9 of Appendix A. A Wetland Delineation Report, provided by Wetlands & Waterways, LLC, can be found in Appendix G. Six wetlands were delineated during the site visit, the identification of which was complicated by effects of the flooding events. These wetlands occur in locations which would be impacted by both action alternatives. Based upon discussions

with the WDNR on February 2, 2018, the WDNR recommended a Rapid Assessment be completed along with an updated map showing the wetland types. Expected impacts to wetlands require permits from the USACE and WDNR. From this meeting, several mitigation options were outlined and discussed pertaining to Wetland Bank Credits. The Ashland (Chequamegon) Bank is the most likely choice for the purchase of credits. Minutes from the February 2, 2018 meeting can be found in Attachment 2 of Appendix C.

Alternative 1 – No Action

Under No Action alternative, no adverse impacts to wetlands are anticipated because construction would not occur.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, approximately 1 acre of wetlands would be impacted by construction of the new campground. The original estimate of 0.63 acres impacted by the campground has been revised to 0.75, and 0.27 acres of wetlands are expected to be impacted from slope stabilization activities. Currently, the campground is designed at 65% and it is expected the design area to change somewhat throughout the design process. Mitigation would be in the form of purchasing wetland credits from the Ashland (Chequamegon) Bank. Of the two action alternatives, Alternative 2 impacts fewer acres of identified wetlands.

Alternative 3 – Campground at Area 2

Under this alternative, approximately 1.75 acres of wetlands would be impacted by construction of the new campground. Currently, the campground is designed at 65% and it is expected the design area to change somewhat throughout the design process. Mitigation would be in the form of purchasing wetland credits from the Ashland (Chequamegon) Bank.

3.2.3 Threatened and Endangered Species

The Endangered Species Act (ESA) of 1973, 16 U.S.C. § 1531, provides a framework for the conservation of endangered and threatened species and their habitats. Federal agencies are required to ensure that actions they fund, authorize, or carry out are not likely to jeopardize the continued existence of any listed species (including plant species) or result in the destruction or adverse modification of designated critical habitats for such species.

In accordance with Section 7 of the ESA, the project area was evaluated for the potential occurrences of federally listed threatened and endangered species. The ESA requires any federal agency that funds, authorizes or carries out an action to ensure that their action is not likely to jeopardize the continued existence of any endangered or threatened species (including plant species) or result in the destruction or adverse modification of designated critical habitats. The Bald Eagle, while not listed under the ESA, remains protected under the Bald and Golden Eagle Protection Act. Species listed under the ESA within Iron County (https://www.fws.gov/midwest/endangered/lists/wisc-cty.html), along with the Bald Eagle, are noted in Table 1.

Table 1: Federally Protected, Endangered & Threatened Species within Iron County

Common Name	Scientific Name	Category	Status	Habitat
Bald Eagle	*Haliaeetus leucocephalus*	Bird	Protected	Habitat found in forested areas and near expanses of shallow fresh or salt water.
Canada Lynx	*Lynx canadensis*	Mammal	Threatened	Habitat includes northern forested areas
Northern Long-eared bat	*Myotis septentrionalis*	Mammal	Threatened	Habitat includes caves and mines in the winter, upland forests in the spring and summer, and wooded areas in the fall.
Gray Wolf	*Canis lupus*	Mammal	Endangered	Habitat found in northern forested areas.

During all site walks of the Alternative site locations, no species listed by the USFWS as endangered or threatened were found on site. Bald Eagles were found nesting on site at alternative locations previously considered and rejected.

Attachment 6 of Appendix C is a memo detailing FEMA's Section 7 determination. In addition, Attachment 3 of Appendix C presents the Endangered Resources Review (ERR) request submitted to the WDNR on June 30, 2017. The results recommend actions to conserve Wisconsin's Endangered Resources. These recommendations for state-listed species will be incorporated into the final plan. No further environmental review is necessary.

Alternative 1 – No Action

Under No Action alternative, no additional areas would be disturbed. No adverse impacts to threatened or endangered species or their critical habitats are anticipated because construction and additional loss of forested habitat would not occur.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, no significant impacts are expected, as none of the threatened or endangered species listed above are likely to be present on site. An Environmental Resource Review was completed, and recommendations will be incorporated into the final design. Mitigation will include implementing construction windows from July 30 through January 15 where human activity within 660 feet of the eagle nest should be avoided. Construction will result in the removal of approximately 17 acres of forested area, potentially decreasing the habitats for the Grey Wolf, Canada Lynx, Northern Long-eared Bat, and Bald Eagle. In addition to the fact that these species have not been identified in the project area, no impacts to these species is likely to occur during the construction phases due to environmental windows in construction permits and erosion control measures. The WDNR response to the ERR for this project supports these conclusions. Environmental windows in construction permits are implemented to prevent construction during important mating and breeding periods, such as fish spawning season and rutting season. Erosion control measures would be implemented to prevent a decrease in habitat for identified water species to address changes in storm water runoff.

Alternative 3 – Campground at Area 2

Under this alternative, impacts to species are roughly identical to those for Alternative 2, with the exception that construction would be conducted somewhat closer to the identified Bald Eagle nest previously noted. This alternative would result in the loss of more than 10 acres of forested area will be removed, though its location would have potentially greater impacts on the previously noted species due to increased construction activity in more densely wooded areas, as well as closer to the nesting site for the Bald Eagle. Despite these minor changes to impacts as compared to Alternative 2, no impact to these species is likely to occur during the construction phases due to environmental windows in construction permits and erosion control measures. Environmental windows in construction permits are implemented to prevent construction during important mating and breeding periods, such as fish spawning season and rutting season. Erosion control measures would be implemented to prevent a decrease in habitat for identified water species to address changes in storm water runoff.

3.3 Socioeconomics

3.3.1 Visual Resources

The Harbor Campground offers the community and tourists views of the natural bluff forested area and the Harbor. From the Harbor, views to the southeast present the heavily-forested bluff, and to the south, views of the bluff on which the current 6-site camping area is situated. Public feedback and guiding principles provided in analyzing the future of the Saxon Campground are summarized in the *Schematic Design Report* (Appendix G). That report reflects a strong desire to enhance and protect viewsheds available throughout Saxon Harbor.

Alternative 1 – No Action

No impacts are expected. The current situation will continue, with visitors unable to use the Harbor Campground and take advantage of its view of the Harbor and the surrounding natural environment.

Alternative 2 – Proposed Action, Campground at Area 1

Alternative 2 would not affect views of the Harbor from the south, but views of the bluff from the Harbor would be affected, specifically the forested section of the bluff. This currently presents as a wall of greenery, as the trees currently extend to edge of the bluff. As one of the goals of this project is to stabilize the bluff, the area would be cleared to accommodate grading. The bluff will be replanted with trees and within a few years the view would essentially be unchanged. Although this change results in the temporary loss of a view of the forested bluff, the cleared area will provide another location for unobstructed views of the harbor until the replanted vegetation matures. The view of the current campground from the harbor will be essentially unchanged, as the new campsites will be positioned south of the current camping area creating better views from the campground of the harbor and Oconto Creek. There is no impact to the walk-in tent campsite therefore no views will be impacted.

Alternative 3 – Campground at Area 2

Alternative 3 would have similar effects on views to the changes noted above for Alternative 2. The primary difference would be the loss of even more forested area on the bluff which would significantly change the viewshed along the entire width of the harbor. Figure 5 of Appendix A illustrates the extent of deforestation required for this alternative. Alternative 3, then, would significantly change the character of the entire length of the northern shore of Oronto Creek. The view would consist almost entirely of improved campgrounds and relatively bare bluffs, rather than the current views or those resulting from Alternative 2, which would leave a significant portion of the currently unimproved bluff unchanged. The only benefit would be additional areas from which to see unobstructed views of the harbor. Therefore, views from the campground of the Oconto Creek and Harbor would enhance the campground location. There is no impact to the walk-in tent campsite therefore no views will be impacted.

3.3.2 Noise

Noise is defined herein as undesirable sound and is federally regulated by the Noise Control Act of 1972 (NCA), 42 U.S.C. § 4901 et seq.. Although the NCA gives the EPA authority to prepare guidelines for acceptable ambient noise levels, it only charges those federal agencies that operate noise-producing facilities or equipment to implement noise standards. The EPA's guidelines, and those of many federal agencies, state that outdoor sound level in excess of 55 decibels are "normally unacceptable" for noise-sensitive land uses such as residences, schools and hospitals.

Alternative 1 – No Action

Under No Action alternative, no impacts related to noise are anticipated.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, only temporary short-term increases in noise levels would be anticipated during construction. Currently, there are no restrictions on construction activities. Iron County has allowed contractors to operate 24/7 with consideration given if complaints are received. The community will be notified about all changes as well as educational and outreach opportunities about the construction progress and anticipated work schedules and noise levels. Long term significant increases in noise levels would not be anticipated.

Alternative 3 – Campground at Area 2

Under this alternative, only temporary short-term increases in noise levels would be anticipated during construction. Currently, there are no restrictions on construction activities. Iron County has allowed contractors to operate 24/7 with consideration given if complaints are received. The community will be notified about all changes as well as educational and outreach opportunities about the construction progress and anticipated work schedules and noise levels. Long term significant increases in noise levels would not be anticipated.

3.3.3 Public Services and Utilities

The nearest school districts within Iron County are in the City of Hurley and Town of Mercer, 16 miles and 50 miles, respectively, from the project location. The fire departments in Iron County include the Town of Saxon (5 miles), City of Hurley (17 miles), and Town of Mercer (50 miles). The nearest police department to the project site is the Hurley Police Department (17 miles). The project will not affect any of these public services. Electrical utilities for the Saxon Harbor area are provided by Xcel (Figure 11 of Appendix A).

This category of inquiry addresses the provision of basic utilities, i.e. electricity and water, to the proposed campsites. Before the storms, each site within the main campground included an electrical hookup for RVs and water spigots. The sites located in the smaller campground south of Oronto Creek had only an on-site water well. The utilities at both sites were destroyed by the storms.

Alternative 1 – No Action

Under No Action alternative, no impacts related to public utilities are anticipated.

Alternative 2 – Proposed Action, Campground at Area 1

At the project site under Alternative 2, sanitary and electric will be connected for the on-site bathrooms. Storm water swales, culverts, and biofilters will be installed to collect and transport storm water off site. A site plan detailing the utilities plan can be found in Appendix H.

Under this alternative, no anticipated long-term adverse impacts are expected during construction. After construction, the community and visitors will have a functional water and sewer system available for tourists and other visitors.

Alternative 3 – Campground at Area 2

At the project site under Alternative 3, there are currently no utilities except an on-site water well. With construction of the new campground, sanitary and electric will need to be connected for the on-site bathrooms. Storm water swales, culverts, and biofilters will be installed to collect and transport storm water off site. As this alternative includes a segment of campground farther to the east of the current – spot campground utility lines would have to extend farther east than under Alternative 2.

Under this alternative, no anticipated long-term adverse impacts are expected during construction. After construction, the community and visitors will have a functional water and sewer system available for tourists and other visitors.

3.3.4 Traffic and Circulation

The entrance to Saxon Harbor Campground is located on CTH A. Due to the 2016 storm events, the CTH A Bridge which carried traffic across Oronto Creek to the campground, was washed out by flooding caused by severe weather. WisDOT began repairs to the CTH A Bridge in May 2018.

Alternative 1 – No Action

Under the No Action alternative, no impacts related to traffic and circulation are anticipated. Only two rustic campsites would remain, one on the North Harbor and a second at the East Rustic Walk-In site with space for 11 tent units. Those campsites still available represent only approximately 25% of the original capacity prior to the damage of the main campground. The loss of camping sites will likely result in a significant decline in tourists, with a resulting drop in traffic throughout the complex.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, during construction there may be temporary traffic circulation delays due to construction work patterns that will impact businesses and traffic circulation. There will also be an increase in heavy equipment traffic. Access to the site would be restricted to protect the public and to minimize risks to safety and human health. The appropriate signage and barriers would be in place prior to construction activities to alert pedestrians and motorists of project activities. The contractor will be required to develop a Traffic Plan, including safety and security measures to be implemented to keep the community and equipment operators safe.

After construction, and in high-demand camping weekends, it is expected that additional traffic will result from increased use of the camping facilities. The relocation of the primary campground south of Oronto Creek will allow any expected increase in traffic flows to avoid the harbor area. Although this alternative may result in an increase in traffic during camping season, it better manages traffic throughout the entire complex.

Alternative 3 – Campground at Area 2

Alternative 3 results in the same changes to traffic and circulation as Alternative 2. In addition, this alternative will require a longer road for RV and car use to allow traffic to get to the campsite area located east along the bluff, increasing the distance cars would have to drive from the campsite to reach the harbor.

During construction there may be temporary traffic circulation delays due to construction work patterns that will impact businesses and traffic circulation. There will also be an increase in heavy equipment traffic. Access to the site would be restricted to protect the public and to minimize risks to safety and human health. The appropriate signage and barriers would be in place prior to construction activities to alert pedestrians and motorists of project activities. The contractor will be required to develop a Traffic Plan, including safety and security measures to be implemented to keep the community and equipment operators safe.

After construction, and in high-demand camping weekends, it is expected that additional traffic will result from increased use of the camping facilities. The relocation of the primary campground south of Oronto Creek will allow any expected increase in traffic flows to avoid the harbor area. Although this alternative may result in an increase in traffic during camping season, it better manages traffic throughout the entire complex.

3.3.5 Environmental Justice (Executive Order 12898)

On February 11, 1994, President Clinton signed EO 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." The EO directs federal agencies, "to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States…." In compliance with FEMA's policy implementing EO 12898, Environmental Justice (FEMA Instruction 108-1-1), the socioeconomic conditions and potential effects related to the No Action, and alternative actions are reviewed.

The Council on Environmental Quality (CEQ) guidance suggests that an environmental justice population may be identified if "the minority population percentage of the affected area exceeds 50%, or if the minority population percentage of the affected area is meaningfully greater than the minority population in the general population or other appropriate unit of geographic analysis" (CEQ, 1997). The CEQ defines low-income populations based on an annual statistical poverty threshold. In 2013, the poverty threshold for the 48 contiguous states for an individual under the age of 65 living alone was $12,119 (U.S. Census Bureau, 2014).

For analyzing impacts to the minority and low-income populations at the Proposed Action Area, data from Iron County is compared to the State of Wisconsin to determine if there were any siting concerns relative to Environmental Justice.

The minority population of the Proposed Action Area (0%) as it is a County Park with no full-time residents) is less than the state as a whole (13.8%) and lower than surrounding county (Iron) geographical area (2.1%). Neither of these differences is considered meaningful.

Income-related data is only available as an estimate and is available at the Census Tract Level. The median household income for Iron County is estimated at $41,270, and the percentage of the individuals with incomes below the poverty level is estimated at 12.8%. The median household income for the State of Wisconsin is estimated at $56,811, and the percentage of individuals with incomes below the poverty level is estimated at 11.8%. These figures are well under the threshold

The percentage of the population below the poverty level for the Proposed Action Area (0%) is lower than the state as a whole (11.3%) and also lower than surrounding Rock County geographical area (11.4%). These differences are not considered meaningful.

No appreciable minority or low-income populations exist within the area directly affected by the Proposed Action. No local community with appreciable minority or low-income populations exists in the surrounding Iron County geographical area. Based on this analysis, there is no concern regarding environmental justice to minority populations at the Proposed Action Area.

It should also be noted, however, that the restoration of campsites at Saxon Harbor and the protection of habitat related to sport fishing is expected to have positive benefits for all residents of Iron County. Campground revenues account for approximately 50% of the total Forestry and Parks' annual budget and are used to offset operational expenses for other County facilities. In

addition, spending by tourists add to the local economy in nearby towns, stimulating the creation of tourism-related jobs and services.

Alternative 1 – No Action

Under the No Action alternative, without restoration of the campground, Forestry and Parks and local businesses lose tourist revenue.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, there is no disproportionately high or adverse long-term impact to the minority community within Iron County. The project will not interfere with minority housing or community centers. The Proposed Action is assumed to have a short construction window with a small number of construction workers dedicated to the project area. It is possible that the county within the general Project Area (Rock) could experience short-term temporary beneficial effects to the local economy through induced spending from construction employees working on the project.

The project also has potential secondary and sustainable economic benefits to the community as a whole by supporting recreational tourism (both for the local community and out-of-state individuals and communities), increasing employment opportunities, and adding positive environmental value, which would be a boost to the overall economy. The proposed project will restore the revenues on which Forestry and Parks and other Iron County services depend. The effects of tourist dollars in other areas of the local economy will be reestablished as well.

Alternative 3 – Campground at Area 2

Under this alternative, as with Alternative 2, there is no disproportionately high or adverse impact to the minority community within Iron County. The short-term and long-term impacts under both alternatives are identical.

3.3.6 Safety and Security

To minimize risks to safety and human health, construction activities would be performed using qualified personnel trained in the proper use of the appropriate equipment including appropriate safety precautions; additionally, activities would be conducted in accordance with the standards specified in Occupational Safety and Health Act (OSHA) regulations, following standard operating procedures and safe work plans.

Alternative 1 – No Action

Under No Action alternative, no impacts related to safety and security are anticipated.

Alternative 2 – Proposed Action, Campground at Area 1

Under this alternative, construction activities would present safety risks to those performing the activities. During construction, access to the site would be restricted to protect the public and to minimize risks to safety and human health. Appropriate signage and barriers would be in place prior to construction activities to alert pedestrians and motorists of project activities. There would be no disproportionate health and safety risks to children.

Alternative 3 – Campground at Area 2

As with Alternative 2, under this alternative, construction activities would present safety risks to those performing the activities. During construction, access to the site would be restricted to protect the public and to minimize risks to safety and human health. The appropriate signage and barriers would be in place prior to construction activities to alert pedestrians and motorists of project activities. There would be no disproportionate health and safety risks to children.

3.4 Historic and Cultural Resources

In addition to review under NEPA, consideration of effects to historic properties is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 C.F.R. Part 800. Requirements include the Agency's identification of the Area of Potential Effect (APE), which is defined in 36 C.F.R. Part 800.16(d) as "the geographic area or areas within which an undertaking which may directly or indirectly cause changes in the character or use of historic properties, if such properties exist."

Historic properties are defined in 36 C.F.R. Part 800.16(l) as buildings, structures, objects, sites or districts included or eligible for listing in or eligible for listing in the National Register of Historic Places (NRHP). In addition to identifying historic properties that may exist in the proposed project's APE, FEMA must also determine, in consultation with the appropriate State Historic Preservation Officer (SHPO) and/or Tribal Historic Preservation Officer (THPO), what effect, if any, the action will have on historic properties. Moreover, if the project would have an adverse effect on these properties, FEMA must consult with SHPO and/or THPO on ways to avoid, minimize, or mitigate the adverse effect. In addition, the NHPA requires that FEMA consult with any other interested consulting parties, including relevant and appropriate members of the public and/or federally-recognized Native American Tribes (Tribes).

For the Saxon Harbor Campground project, FEMA consulted with the SHPO on both the campground relocation and the return of Saxon Harbor itself to pre-disaster condition. At that time, there were two alternatives for the campground location, both of which were included in the archaeological survey which was prepared in support of FEMA's finding. FEMA initiated consultation with the SHPO on November 16, 2017, to inform SHPO of the scope of the proposed undertakings. FEMA determined that no historic properties, either structures or archaeological resources, existed within the APE for either undertaking. The consultation materials included documentation supporting FEMA's finding of no historic properties affected. SHPO concurred with FEMA's finding in their response dated November 21, 2017.

Although Tribal lands do not constitute any part of the APE, in compliance with the NHPA and related executive orders regarding consultation with federally-recognized Indian Tribes, FEMA notified THPOs and tribal leaders of eight federally-recognized Tribes with potential ancestral interests in Iron County, requesting comment on the restoration of the harbor and the relocation of the campground. These notifications were prepared in April of 2017 and included a preliminary campground location that was later rejected. However, the site location outlined for the two proposed undertakings in that notification included the locations of both Alternatives 2 and 3

presented here. One tribe, the Mille Lacs Band of Ojibwe of Minnesota responded, noting that they have no record of sites of religious or cultural significance in the area.

FEMA's consultations met the requirements of a number of laws and executive orders, including but not limited to Sections 1508.27(b)(3,6, and 8) of NEPA regarding the context and intensity or severity of impacts on historic and cultural resources and Section 106 of the NHPA, as amended, and implemented by 36 C.F.R. Part 800. Applicable laws and executive orders governing treatment of archaeological artifacts and Tribal resources are noted in the appropriate sections below.

Select documents from the SHPO consultation documentation are included in Attachment 4 of Appendix C. An electronic copy of the full set of documentation is available upon request from Mr. Duane Castaldi at duane.castaldi@fema.dhs.gov. Copies of the tribal letters and responses are provided in Appendix D.

3.4.1 Historic Structures

Construction drawings show two structures in the vicinity of the Alternative 2 proposed campground area to be demolished. One is a sanitary facility (restrooms) built early mid-1970s constructed of concrete block with pit toilets, while the other is a pre-fabricated storage shed for the previous campground built in 2008. Neither are historic structures.

Alternative 1 – No Action

Under No Action alternative, no impacts to historic structures are anticipated.

Alternative 2 – Proposed Action, Campground at Area 1

No impacts to historic structures are anticipated.

Alternative 3 – Campground at Area 2

No impacts to historic structures are anticipated.

3.4.2 Archaeological Resources

The Archaeological and Historic Preservation Act of 1974 provides for the survey, recovery, and preservation of significant scientific, prehistoric, archeological or paleontological data when such data may be destroyed or irreparably lost due to a federal, federally licensed, or federally funded (in part or whole) project. If such data is anticipated to be destroyed or irreparably lost, FEMA will consult with the Secretary of the Interior in an effort to recover, preserve, and protect such data. Other federal laws applicable to this undertaking include the American Indian Religious Freedom Act (AIRFA) of 1978, under which FEMA is responsible for the protection and preservation of American Indian sites, possessions, and ceremonial and traditional rites. If any of these are anticipated to be affected by the Proposed Action, AIRFA promotes consultation with American Indian religious practitioners by the federal agency. In accordance with the NHPA, information concerning the nature and location of archaeological resources and traditional cultural properties and detailed information regarding archaeological and cultural resources is confidential.

Finally, records related to the presence of archaeological and/or burial sites are confidential, and are exempt from open records requests pursuant to Wis. Stat. §44.48 and 157.70. For this reason some of the information in the archaeological report included in Appendix G has been redacted.

3.4.2.1 Archaeological Survey

Site locations for Alternatives 2 and 3 include portions of a previously-identified archaeological site, referred to as the Saxon Trading Post Site. A Phase 1 Archaeological Survey was conducted in July 2017. As noted in the report (Appendix G, Attachment 6), no remains or artifacts were discovered, and further archaeological work is not recommended. That report, in conjunction with FEMA's documentation, supported FEMA's finding and the SHPO's concurrence (Appendix C) that no historic archaeological properties will be affected by any of the project alternatives presented here.

Alternative 1 – No Action

Under No Action alternative, no impacts to historic or cultural resources are anticipated.

Alternative 2 – Proposed Action, Campground at Area 1

An archeological assessment of the project area was conducted in July 2017 (Appendix G, Attachment 6). That assessment suggests it is unlikely that cultural resources or human remains will be encountered during construction and that no further archeological work is recommended. If any cultural artifacts or human remains are discovered during construction, construction will be halted, and appropriate authorities will be contacted immediately.

The following project conditions would provide additional protection to archaeological sites potentially impacted by Alternative 2:

1. Applicant will require its contractor to monitor ground disturbance and if any potential archeological resources are discovered, to immediately cease construction in that area and notify the State and FEMA. The applicant will ensure construction activities in the vicinity of the discovery are immediately halted and will take all reasonable measures to avoid or minimize harm to the property until FEMA concludes consultation with the SHPO, THPOs, and other appropriate consulting parties, including Tribes.
2. Contractor is expected to use fill from a commercial source or regularly-maintained stockpile. If this is not the case, the subrecipient shall inform FEMA of the fill source so required agency consultations can be completed prior to beginning ground disturbing activities.

Alternative 3 – Campground at Area 2

An archeological assessment of the project area was conducted in July 2017 (Appendix G, Attachment 6). That assessment suggests it is unlikely that cultural resources or human remains will be encountered during construction and that no further archeological work is recommended. If any cultural artifacts or human remains are discovered during construction, construction will be halted and appropriate authorities will be contacted immediately.

The following project conditions would provide additional protection to archaeological sites potentially impacted by Alternative 3:

1. Applicant will require its contractor to monitor ground disturbance and if any potential archeological resources are discovered, to immediately cease construction in that area and notify the State and FEMA. The applicant will ensure construction activities in the vicinity of the discovery are immediately halted and will take all reasonable measures to avoid or minimize harm to the property until FEMA concludes consultation with the SHPO, THPOs, and other appropriate consulting parties, including Tribes.
2. Contractor is expected to use fill from a commercial source or regularly-maintained stockpile. If this is not the case, the subrecipient shall inform FEMA of the fill source so required agency consultations can be completed prior to beginning ground disturbing activities.

3.4.3 Tribal Coordination and Religious Sites

In accordance with 36 C.F.R. Part 800.8(a)(2), the Advisory Council on Historic Preservation indicates that consultation with Tribes should begin early in the NEPA process regarding the possible effects of disaster recovery efforts on cultural properties of religious or traditional significance, or cultural properties formally designated as Traditional Cultural Properties. Amendments to Section 101 of the NHPA in 1992 strengthened the connection between the NHPA and AIRFA (42 U.S.C. § 1996). AIRFA requires consultation with Native American groups concerning proposed actions on sacred sites on federal land or affecting access to sacred sites. It establishes federal policy to protect and preserve for American Indians, Eskimos, Aleuts, and Native Hawaiians their right to free exercise of their religion in the form of site access, use and possession of sacred objects, and freedom to worship through ceremonial and traditional rites. AIRFA requires federal agencies to consider the impact of their actions on religious sites and objects important to these peoples, regardless of eligibility for listing on the NRHP.

Tribal consultation was also undertaken in accordance with EO 13175, titled Consultation and Coordination with Indian Tribal Governments, signed by President Clinton on November 6, 2000. This EO directs federal agencies, “to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes….”

FEMA submitted invitations to join the consultation or to provide comment on the presence or absence of known cultural properties of religious or traditional significance, or of cultural properties formally designated as Traditional Cultural Properties, within the proposed project area. This request for comment was sent on April 12, 2017, to the Bad River Band of Lake Superior Tribe of Chippewa Indians, the Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin, the Lac Vieux Desert Band of Lake Superior Chippewa Indians, the Mille Lacs Band of Ojibwe Indians, the Minnesota Chippewa Tribe, the White Earth Band of Ojibwe, the Grand Portage Band of Lake Superior Chippewa, and the Winnebago Tribe of Nebraska. Those letters and the responses received are included in Appendix D, Tribal Nation Consultation. One tribe, the Mille Lacs Band of

Ojibwe of Minnesota responded, noting that they have no record of sites of religious or cultural significance in the area. No tribe had comments regarding the proposed archaeological survey, which commenced after the 30-day response period had elapsed.

Alternative 1 – No Action

Under the No Action alternative, no impacts to Tribal cultural resources are anticipated.

Alternative 2 – Proposed Action, Campground at Area 1

Under Alternative 2, no impacts to Tribal cultural resources are anticipated.

Alternative 3 – Proposed Action, Campground at Area 2

Under Alternative 3, no impacts to Tribal cultural resources are anticipated.

3.5 Comparison of Alternatives

This section describes the potential impacts from the proposed alternatives and the No-Action Alternative. Where potential impacts exist, conditions or mitigation measures to offset these impacts are detailed in the body of the document. A summary table is provided below.

Table 2: Summary of Environmental Impacts

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and • *Mitigation*	Alternative 3: Impacts and • *Mitigation*
Soils and Geology	**Potential for continued long-term erosion.**	**No significant long-term impacts expected.** • *Subrecipient will implement BMPs as required by permits to minimize soil erosion and storm water runoff during construction.* • *A Post-Construction Storm Water Permit will be obtained.*	**No significant long-term impacts expected.** • *Subrecipient will implement BMPs as required by permits to minimize soil erosion and storm water runoff during construction.* • *A Post-Construction Storm Water Permit will be obtained.*

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and • *Mitigation*	Alternative 3: Impacts and • *Mitigation*
Water Resources and Water Quality	**No adverse impacts to surface waters are anticipated, though water quality may degrade due to continued erosion.**	**Temporary impacts to surface water during construction expected.** • *Subrecipient will implement BMPs as required by permits to minimize soil erosion and storm water runoff during construction.* • *A Post-Construction Storm Water Permit will be obtained.* • *The non*-navigable stream will maintain flow and water quality to not impact surrounding ecosystems.	**Temporary impacts to surface water during construction expected.** • *Subrecipient will implement BMPs as required by permits to minimize soil erosion and storm water runoff during construction.* • *A Post-Construction Storm Water Permit will be obtained.* • *The non*-navigable stream will maintain flow and water quality to not impact surrounding ecosystems.
Floodplain Management	**No impacts expected.**	**No impacts expected.**	**No impacts expected.**
Air Quality	**No impacts expected.**	**No permanent impacts. Temporary impacts during construction are anticipated.** • *Reduce the potential for temporary air quality impacts during the construction by minimizing, running fuel-burning equipment running time, minimizing open construction areas, and watering open construction areas to control dust when necessary.*	**No permanent impacts. Temporary impacts during construction are anticipated**. • *Reduce the potential for temporary air quality impacts during the construction by minimizing, running fuel-burning equipment running time, minimizing open construction areas, and watering open construction areas to control dust when necessary.*
Coastal Zone Management	**No impacts expected.**	**No significant impacts expected.** • *Requirements for federal consistency to be met through permitting requirements.*	**No significant impacts expected.** • *Requirements for federal consistency to be met through permitting requirements.*

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and • *Mitigation*	Alternative 3: Impacts and • *Mitigation*
Terrestrial and Aquatic Environment	**Erosion of the creek embankments and shoreline may cause impacts.**	**Impacts due to construction activities are likely.** • *Terrestrial and aquatic environments will be protected against potential impacts during construction. Native grasses and vegetation will be planted throughout disturbed areas.*	**Impacts due to construction activities are likely.** • *Terrestrial and aquatic environments will be protected against potential impacts during construction. Native grasses and vegetation will be planted throughout disturbed areas.*
Wetlands	**No impacts expected.**	**Approximately 1 acre of wetlands to be impacted.** • *Impacts would be offset by securing wetland credits.*	**Approximately 1.75 acres of wetlands to be impacted.** • *Impacts would be offset by securing wetland credits.*
Threatened and Endangered Species	• **No impacts expected.**	**Potential for decreased habitat.** • *Environmental windows in construction permits minimize potential harm to species.* • *Avoid engaging in construction activities within 660 feet or a bald or golden eagle nest during nesting and fledging.* • *To reduce any potential adverse effects on the federally threatened Northern Long Eared Bat, trees with woody stems greater than 3" diameter at breast height may not be cut between April 1 and September 30 of any year.* • *Recommendations from the WDNR response to the ERR will be implemented during construction.*	**Potential for decreased habitat.** • *Environmental windows in construction permits minimize potential harm to species.* • *Avoid engaging in construction activities within 660 feet or a bald or golden eagle nest during nesting and fledging.* • *To reduce any potential adverse effects on the federally threatened Northern Long Eared Bat, trees with woody stems greater than 3" diameter at breast height may not be cut between April 1 and September 30 of any year* • *Recommendations from the WDNR response to the ERR will be implemented during construction.*

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and • *Mitigation*	Alternative 3: Impacts and • *Mitigation*
Zoning and Land Use	**No impacts expected.**	**No impacts expected.**	**No impacts expected.**
Visual Resources	**No impacts expected.**	**Views of the bluff from the Harbor would be temporarily changed, and views of the Harbor from some parts of the bluff would be improved.**	• **Views of the bluff from the Harbor would include more campsites, and views of the Harbor from some parts of the bluff would be improved.**
Noise	**No impacts expected.**	**Short-term impacts due to construction.** • *Construction activities will be limited to hours that comply with the Town of Saxon's noise ordinance and equipment will be kept in a good working order to minimize noise.*	**Short-term impacts due to construction.** • *Construction activities will be limited to hours that comply with the Town of Saxon's noise ordinance and equipment will be kept in a good working order to minimize noise.*
Public Service and Utilities	**No impacts expected.**	**No impacts expected.**	• **No impacts expected.**
Traffic and Circulation	**Short-term decline in number of visitors expected to result in reduced traffic.**	**No long-term impacts expected.** • *Access to the site restricted to protect the public.* • *Appropriate signage and barriers would be in place prior to construction.* • *The contractor will be required to develop a Traffic Plan, including safety and security measures.*	**No long-term impacts expected.** • *Access to the site restricted to protect the public.* • *Appropriate signage and barriers would be in place prior to construction.* • *The contractor will be required to develop a Traffic Plan, including safety and security measures.*
Environmental Justice	**Community expected to be affected by loss of economic activity.**	**Resulting increase in economic activity not expected to cause disproportionately high or adverse impacts to minority communities.**	**Resulting increase in economic activity not expected to cause disproportionately high or adverse impacts to minority communities.**

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and • *Mitigation*	Alternative 3: Impacts and • *Mitigation*
Safety and Security	**No impacts expected.**	**Construction activities increase the safety risks for those preforming the work.** • *All construction activities will be performed using qualified personnel, and all activities would be conducted in accord with OSHA standards.*	**Construction activities increase the safety risks for those preforming the work.** • *All construction activities will be performed using qualified personnel, and all activities would be conducted in accord with OSHA standards.*
Historic Structures	**No impacts.**	**No impacts.**	**No impacts.**
Archaeological Resources	**No impacts expected.**	**No impacts expected.** • *If any potential archaeological resources are discovered, will immediately cease construction in that area and notify the WEM and FEMA.* • *Contractor is expected to use fill from a commercial source or regularly-maintained stockpile, or repurposing fill from areas being graded as part of the proposed alternative.*	**No impacts expected.** • *If any potential archaeological resources are discovered, will immediately cease construction in that area and notify the WEM and FEMA.* • *Contractor is expected to use fill from a commercial source or regularly-maintained stockpile, or repurposing fill from areas being graded as part of the proposed alternative.*
Tribal Coordination and Religious Sites	**No impacts expected.**	**No impacts expected.** • *If any potential archaeological resources are discovered, will immediately cease construction in that area and notify the WEM and FEMA.* • *Contractor is expected to use fill from a commercial source or regularly-maintained stockpile, or repurposing fill from areas being graded as part of the proposed alternative.*	**No impacts expected.** • *If any potential archaeological resources are discovered, will immediately cease construction in that area and notify the WEM and FEMA.* • *Contractor is expected to use fill from a commercial source or regularly-maintained stockpile, or repurposing fill from areas being graded as part of the proposed alternative.*

SECTION FOUR: CUMULATIVE IMPACTS

Cumulative impacts are the incremental actions when added to the project in the past, present, or future and how their combined effect of the proposed action impacts the vicinity of the project area. In accordance with NEPA, this EA has reviewed all the Alternatives and other actions according to their cumulative impact on the proposed project area. Surrounding the Harbor Campground, there are three other projects being completed in the area – relocation of County Highway A, repairs to the harbor, and dredging within the harbor.

4.1 Relocation of County Highway A

The relocation of County Highway A, damaged by the 2016 storms, will have an impact on all alternatives. It provides access to the harbor from the campground by car. With the relocated alternatives there is an increased distance from the campgrounds to the harbor. If County Highway A is not relocated and repaired, access to the Harbor will be limited, reducing demand for use of the harbor and campgrounds. No significant impacts to traffic and circulation are expected to result from this change.

4.2 Dredging

Removing the built up of sediment from the 2016 storms will benefit those wishing to use the harbor. Harbor use will promote use of the campgrounds. Measures will be put in place as required by permits to restrict transport of sediment within working areas to limit any impacts from this work.

4.3 Repairs to the Harbor

Repairs and restoration of the Harbor allows tourists and residents to make use of the harbor's resources. Harbor repairs will result in beneficial economic effects similar to those noted in Section 3.4.5, Environmental Justice, above.

4.4 Future Projects Near the Site

The Asset-Based Community Development Strategy calls for improvements such as trails, kiosks, kayak launches to be installed throughout the harbor complex. These would have negligible environmental impacts. Other plans proposed but not currently funded include the expansion of the campsite, which would require additional clearing and grading, and likely extension of utilities to areas not currently affected by the project alternatives under review here. Such an expansion would be expected to have effects similar to those identified for the campground relocation, the impacts being relatively minor or easily mitigated.

All future projects will be required to comply with appropriate local, state, and federal rules and regulations. Compliance with these regulations will help avoid negative cumulative impacts.

SECTION FIVE: PUBLIC PARTICIPATION

In 2016, shortly after the FEMA-4276-DR flood event, the Iron County Board initiated discussions with the community regarding the need to restore the campground. Public notice for community input was advertised in several newspapers and news websites within the community on September 8, 2016. Results from the surveys can be found in Appendix F. The community participated in a survey providing feedback into what they are looking for in a campground and lessons learned from the previous campground. The most notable issue was the lack of cell service on site, which is a serious security and safety issue for any visitor or boater. On December 6, 2016, the Iron County Board of Supervisors met to discuss rebuilding the campground and Saxon Harbor marina. During this meeting Iron County Forestry Department representatives explained to the board the funding options from FEMA. The outcome of this meeting was for the Iron County Forestry Department to return to with more details about the proposed restored campground site.

On May 4, 2017, the Campground Relocation Plan was presented to a group of Saxon Harbor Stakeholders, and on October 10, 2017, to the community. These presentations reviewed the construction schedule, project alternatives, and scope of work. Stakeholders brought forward concerns or suggestions to improve the design to better meet the needs of the community. A primary concern voiced was the need for more campground space in response to demand and to provide continued support for Iron County tourism.

This EA will be available to the public for review and comments for 30 days. Public notice regarding the public comment period and the availability of this document was published on April 1, 2019, in the *Daily Globe*, which is the county's newspaper of record and the newspaper located closest to the project area. This EA will be available for review at the Iron County Forestry Deportment Office, 607 3rd Ave N, Suite 2 Hurley, WI 54534, from 6 a.m. to 4 p.m. Monday through Thursday. Electronic copies for review will be available on the FEMA website under "Recent Environmental Documents & Public Notices in Region V" (https://www.fema.gov/recent-environmental-documents-public-notices-region-v) and on the Iron County website under the (https://www.ironcountyforest.org/). A copy of the public notice is included in Appendix E. The public was given the opportunity to comment on the project from April 1, 2019 through May 1, 2019.

SECTION SIX: MITIGATION MEASURES AND PERMITS

In accordance with the applicable local, State, and Federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project area. During the design process for the site, other permits not referenced may need to be included. Construction activities will adhere to all permit requirements. The following permits and approvals may be required prior to construction:

1. USACE – Section 404 Wetland Disturbance Permit
2. WDNR – Individual Wetland Permit
3. WDNR – Wetland Mitigation Banking

4. WDNR – Construction Permit
5. WDNR – Storm Water Pollution Prevention Plan, may be required
6. WDNR – Post Construction Storm Water Permit

Iron County Forestry will follow all state and federal rules and regulations that pertain to the proposed project and will obtain all applicable permits prior to commencing work at the proposed site. If permit conditions change the scope of work for the project, changes to scope will be submitted to FEMA for additional review.

The mitigation measures listed here will be followed for the implementation of the Proposed Action:

1. Subrecipient will implement BMPs as required by permits to minimize soil erosion and storm water runoff during construction. The proposed measures include minimizing the disturbed area, maintaining vegetative cover, and providing inlet protection, silt fencing and erosion matting.
2. Subrecipient will implement measures to reduce the potential for temporary air quality impacts during the construction, including keeping fuel-burning equipment running time to a minimum, minimizing open construction areas, and watering open construction areas to control dust when necessary.
3. If hazardous materials are encountered during the construction timeline, the materials will be handled and disposed of properly in accordance with all their applicable rules and regulations.
4. Terrestrial and aquatic environments will be protected against potential impacts during construction. Native grasses and vegetation will be planted throughout disturbed areas.
5. Avoid engaging in construction activities within 660 feet or a bald or golden eagle nest during nesting and fledging.
6. To reduce any potential adverse effects on the federally threatened Northern Long Eared Bat, trees with woody stems greater than 3" diameter at breast height may not be cut between April 1 and September 30 of any year.
7. Construction activities will be limited to hours that comply with the Town of Saxon's noise ordinance. Additionally, all equipment will be kept in a good working order to minimize noise.
8. To protect the community and construction operators against risks to safety and human health, all construction activities will be performed using qualified personnel trained in the proper use of the appropriate equipment including all appropriate safety precautions. Additionally, all activities would be conducted in a safe manner in accordance with the standards specified in the OSHA regulations.
9. Subrecipient will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the WEM and FEMA. Subrecipient will ensure construction activities in the vicinity of the discovery are immediately halted and will take all reasonable measures to avoid or minimize harm to the property until FEMA concludes consultation with the SHPO, THPOs, and other appropriate consulting parties.

10. Contractor is expected to use fill from a commercial source or regularly-maintained stockpile, or repurposing fill from areas being graded as part of the proposed alternative. If this is not the case, the subrecipient shall inform FEMA of the fill source so required agency consultations can be completed prior to beginning ground disturbing activities
11. If deviations from the proposed scope of work result in substantial design changes, including the need for additional ground disturbance, additional removal or vegetation, or in any other unanticipated changes to the physical environment, the Subrecipient must contact FEMA, and a re-evaluation under NEPA and other applicable environmental laws will be conducted by FEMA.
12. The applicant is responsible for obtaining and complying with all required local, State, and Federal permits and approvals.

SECTION SEVEN: CONSULTATIONS AND REFERENCES

7.1 Consultations

The following agencies and interested parties were consulted during the preparation of this EA:

Bad River Band of Lake Superior Tribe of Chippewa Indians

Federal Emergency Management Agency

Grand Portage Band of Lake Superior Chippewa

Iron County

Lac Vieux Desert Band of Lake Superior Chippewa Indians

Mille Lacs Band of Ojibwe Indians, the Minnesota Chippewa Tribe

Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin

Town of Saxon

U.S. Army Corps of Engineers

U.S. Fish and Wildlife Service

White Earth Band of Ojibwe

Winnebago Tribe of Nebraska

Wisconsin Department of Administration

Wisconsin Department of Natural Resources

Wisconsin State Historic Preservation Office

7.2 References

Archaeological Research Inc., 2017. Phase 1 Archaeological Investigations for Saxon Harbor and Saxon Harbor Campground Relocation. July 2017.

Clayton, L., 1984. Pleistocene geology of the Superior Region, Wisconsin: Wisconsin Geological and Natural History Survey Information Circular 46, 40 p.

FEMA Flood MAP Service Center | Search By Address (FEMA Flood Map Service Center | Search By Address) https://msc.fema.gov/portal/search#searchresultsanchor. Accessed May 30, 2018.

Minnesota Sea Grant http://www.seagrant.umn.edu/fisheries/superior_fish_species. Accessed May 30, 2018.

SmithGroupJJR, Foth Infrastructure & Environment, LLC, and U.P. Engineers & Architects, Inc., 2018. *Draft Saxon Harbor Marina and Campground: Schematic Design Report*. January 2018.

Thwaites, F. T. Sandstones of Wisconsin of the Wisconsin Coast of Lake Superior, Wisconsin Geological and Natural History Survey Bulletin No. 25, 1912.

U.S. Census Bureau, 2010. American Fact Finder. https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml. Accessed May 30, 2018.

U.S. Department of Agriculture. Soil Survey Staff, National Resources Conservation Service, Web Soil Survey, Wisconsin. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed May 30, 2018.

U.S. Fish and Wildlife Service. National Wetlands Inventory https://www.fws.gov/wetlands/data/mapper.html. Accessed May 30, 2018.

U.S. Geological Survey. U.S. Seismic Hazard Maps https://earthquake.usgs.gov/hazards/hazmaps/conterminous/index.php#2018. Accessed June 6, 2018.

Wetlands & Wetlands, LLC, 2017. Wetland Delineation Report for Saxon Harbor Marina and Campground Reconstruction. October 26, 2017.

Wisconsin Department of Natural Resources. RR Sites Map https://dnrmaps.wi.gov/H5/?viewer=rrsites. Accessed May 30, 2018.

Wisconsin Department of Natural Resources. Wetland Inventory Data Viewer https://dnrmaps.wi.gov/H5/?Viewer=SWDV&runWorkflow=Wetland Accessed May 30, 2018.

Wisconsin Historical Society. Wisconsin Architecture and History Inventory, Ironton Harbor, Saxon, Iron, WI, 18641.

SECTION EIGHT: LIST OF PREPARERS

Preparation and Quality Control Review of the EA

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APPENDICES

Appendix A – Maps and Figures

Appendix B – Photo Log

Appendix C – Agency Correspondence

Appendix D – Tribal Nation Consultation

Appendix E – Public Notice

Appendix F – Public Comments

Appendix G – Technical Reports

Appendix H – Design Review Plan Set for Alternative Number 2

To obtain a copy of this report or portions of it, please contact Duane Castaldi, Regional Environmental Officer, FEMA, 536 South Clark Street, 6th Floor, Chicago, IL 60605-1521, or at duane.castaldi@fema.dhs.gov.