



## PUBLIC INVOLVEMENT, INCLUDING SCOPING

Prior to the official start of this planning process, the National Park Service held 35 meetings with 793 people, increasing the awareness of the wilderness situation at the National Lakeshore and hearing from the public their preferences for resolution. Primarily as a result of these meetings, the National Park Service decided to begin a new general management planning process that included a *Wilderness Study*.

The public was notified of this Sleeping Bear Dunes planning effort via: (1) a *Federal Register* notice of intent, dated December 28, 2005, to prepare an environmental impact statement; (2) distribution of the first newsletter for this effort in January 2006; and (3) a press release announcing a public comment opportunity, including public scoping meetings for the general management plan.

*Newsletter 1*, issued in January 2006,

- introduced the concepts of general management plans and wilderness studies
- outlined preliminary issues and concerns for the planning effort
- provided a general timetable for development of the *General Management Plan / Wilderness Study / Environmental Impact Statement*
- provided draft purpose and significance statements
- invited the public to participate in the planning process by providing comment
- provided a comment form and website link to facilitate public comment
- invited the public to attend scoping meetings for the *General Management Plan / Wilderness Study / Environmental Impact Statement*

Scoping is an early and open process for determining the scope of a proposed action or project and for identifying issues related to the project. During scoping, NPS staff provide an overview of the project, including purpose and need and preliminary issues. The public is asked to submit comments, concerns, and suggestions relating to the project and preliminary issues.

A public comment period was open from January 30 to March 17, 2006. Public scoping meetings (open-house style) were held on February 14 and 15, 2006, in Empire and Traverse City, Michigan, respectively. A third meeting scheduled for February 16 in Benzonia, Michigan, was postponed until March 2, 2006, due to adverse weather conditions. Meetings with NPS employees were also held. The main purpose of the comment period and meetings was to introduce the planning process and gather ideas about what the plan should address. Frequently asked questions and answers were posted on the Lakeshore's website and were updated throughout the planning process. Nearly 150 people attended the three scoping meetings. More than 300 written comments were received in response to *Newsletter 1* and at the public open houses. A summary of public comments was posted on the Lakeshore's website in May 2006.

*Newsletter 2*, issued in April 2006,

- summarized public scoping comments
- answered frequently asked questions
- presented the draft foundation for planning and management — the purpose and significance statements (revised); the fundamental resources and values; the primary interpretive themes; and special mandates
- provided a planning steps/timetable update
- invited the public to participate in the planning process by providing comments

- provided a comment website link to facilitate public comment
- invited the public to attend public planning workshops

A public comment period, including three public planning workshops, was announced in *Newsletter 2* and in a press release. The comment period was open from May 22 to July 7, 2006, and the workshops were held in Traverse City, Michigan, on June 20 and 21, 2006. An NPS employee workshop was also held. The purpose of the comment period and workshops was to gather input about how to manage the National Lakeshore. In total, about 70 people participated in the public workshops, and 25 additional written comments were received via mail, email, and the NPS' PEPC (Planning, Environment, and Public Comment) system. This input was used to develop alternative management concepts and draft management zones. A summary of public and staff comments was posted on the Lakeshore's website in September 2006.

A press release explaining and clarifying the wilderness situation at the National Lakeshore was issued in July 2006.

*Newsletter 3*, issued in October 2006,

- briefly summarized the June public planning workshops
- presented draft management zones and alternative management concepts
- provided a wilderness study update
- presented draft desired conditions for the National Lakeshore
- provided a planning steps/timetable update
- invited the public to participate in the planning process by providing comments
- provided a comment form and website link to facilitate public comment

A public comment period was open from October 11 to November 10, 2006. The main purpose of the comment period was to introduce the alternative management

concepts and gather ideas about the draft management zones, the alternative management concepts, and desired future conditions. More than 200 written comments were received in response to *Newsletter 3*. A summary of public comments was posted on the Lakeshore's website in February 2007.

*Newsletter 4*, issued in April 2007,

- briefly summarized public comments on *Newsletter 3*
- presented refined management zones
- presented four preliminary alternatives based on the alternative concepts from *Newsletter 3*
- provided brief informational sections on wilderness and user capacity
- provided a planning steps/timetable update
- invited the public to participate in the planning process by providing comments
- provided a comment form and website link to facilitate public comment
- invited the public to attend public meetings

A public comment period, including three public meetings, was announced in *Newsletter 4* and in a press release. The comment period was open from March 31 to May 14, 2007. Three public meetings were held in Honor, Glen Arbor, and Traverse City, Michigan, on May 1, 2, and 3, 2007, respectively. Meetings with NPS employees were also held. The purpose of the comment period and the meetings was to gather comments on the preliminary alternatives and what should be included in the preferred alternative. About 200 people participated, and more than 400 written comments were received. A summary of public comments was posted on the Lakeshore's website in August 2007.

Using input from the public and considering the probable environmental consequences and costs of the alternatives, the planning team developed the preferred alternative. The *Draft General Management Plan / Wilderness*

*Study / Environmental Impact Statement* was then produced and distributed for public review. The mailing list for the draft document included nearly 2,400 individuals and groups.

The *Draft General Management Plan / Wilderness Study / Environmental Impact Statement* for Sleeping Bear Dunes National Lakeshore was made available for public review beginning April 7, 2008; the comment period ended on June 15, 2008. Public meetings were held at Honor, Traverse City, and Glen Arbor, Michigan, on June 3, 4, and 5, 2008, respectively, with a total of 196 people attending. A total of 292 comments were received via letters (66 total), e-mails (60 total), Web responses (129 total), and comments transcribed from the public meetings (37 total). Comments came from 20 different states. Many other meetings and a radio broadcast regarding the draft plan were attended by park staff, for example, congressional briefings and meetings with road commissions, friends groups, federal agencies, state agencies, and townships.

National Lakeshore staff conducted an extensive public involvement and outreach program throughout the planning process. By the time of printing the *Final General Management Plan / Wilderness Study / Environmental Impact Statement*, NPS staff had held more than 90 informational meetings with the general public and dozens of groups or representatives (see list below) upon their request. More than 2,500 people in total attended these meetings.

- Benzie County Commissioners
- Benzie County Kiwanis Club
- Benzie County Parks and Recreation
- Benzie County Road Commission
- Benzie Fishery Coalition
- Benzie Rotary Club
- Benzie Sunrise Rotary Club
- Cherry Capital Paddling Club
- Citizens for Access to the Lakeshore
- Citizens' Council for Sleeping Bear Dunes

- Cleveland Township
- Conservation Resource Alliance
- Crystal Lake Watershed Association
- Empire Lions Club
- Frankfort Rotary Club
- Friends of Sleeping Bear Dunes
- Glen Arbor Community Forum
- Glen Arbor Township
- Grand Traverse Band of Ottawa and Chippewa Indians
- Golden K Kiwanis Club
- Interlochen Public Radio
- Leelanau Chamber of Commerce & Businesses
- Leelanau County Commissioners
- Leelanau County Planning Commission
- Leelanau County Road Commission
- Leelanau Rotary Club
- Leelanau Scenic Route Committee
- Manitou Islands Memorial Society
- Michigan congressional delegation
- Michigan state historic preservation officer
- Michigan Department of Natural Resources
- Michigan Department of Environmental Quality
- Michigan Land Use Institute
- Manitou Island Transit
- National Parks Conservation Association
- Natural Resource Conservation Service
- Noon Tiders
- Northwestern Community College
- Platte Township
- Preserve Historic Sleeping Bear
- Republican Women of Leelanau County
- Rotary Club of Traverse City
- Traverse City Kiwanis
- U.S. Fish and Wildlife Service
- WTCM 580 Radio

Newsletters were available online, as were other documents related to this planning effort (e.g., public comment summaries, frequently asked questions, letters, and planning updates from the superintendent). *The Draft General Management Plan / Wilderness Study / Environmental Impact*

*Statement* was also available online. An interactive web forum related to the planning effort was also available. A press release was sent to media outlets announcing the web forum and encouraging the public to share their thoughts and ideas in a public way. An NPS moderator interacted with forum users, answering questions and facilitating open discussions for all to see.

The *Final General Management Plan / Wilderness Study / Environmental Impact Statement* is available online at the National Lakeshore's website ([www.nps.gov/slbe](http://www.nps.gov/slbe)).

## CONSULTATION AND COORDINATION TO DATE WITH OTHER AGENCIES, OFFICES, AND TRIBES

### FEDERAL AGENCIES

The National Park Service contacted the U.S. Fish and Wildlife Service (USFWS) in a letter dated February 16, 2006. The letter advised the U.S. Fish and Wildlife Service of the NPS planning process for this *General Management Plan / Wilderness Study / Environmental Impact Statement* and requested a current list of federally listed threatened, endangered, or candidate species within the National Lakeshore. The U.S. Fish and Wildlife Service responded in a letter dated March 21, 2006; the response letter included a list of such species found within Leelanau and Benzie counties. On March 27, 2007, National Lakeshore managers met with USFWS representatives to discuss the planning process.

In subsequent communications, Lakeshore staff sought advice from the U. S. Fish and Wildlife Service regarding how to fulfill NPS responsibilities for complying with Section 7 of the Endangered Species Act. On September 26, 2007, the two agencies agreed that a biological assessment should not be prepared in association with this *General Management Plan*. A general management plan is broad and strategic in nature (rather than a “major construction activity,” which is the usual trigger for preparation of a biological assessment). Details about many individual proposals mentioned in the *General Management Plan* alternatives, such as trail development and facility improvements, have not been yet been determined; project specifics that allow more meaningful impact assessment would be detailed in subsequent implementation plans. The National Park Service will continue to consult with the U. S. Fish and Wildlife Service in the future on a project-by-project basis concerning the need for additional Section 7 consultation. The

initial letter from the U. S. Fish and Wildlife Service is reproduced in appendix F.

The environmental consequences portion of this document (chapter 5) provides, to the extent possible, a *general* analysis of potential impacts on federally listed species and critical habitat for all alternatives, and for the preferred alternative a determination of effect is also provided. The U. S. Fish and Wildlife Service has advised the National Park Service that the EIS analysis fulfills the requirement for a biological assessment and for informal consultation under Section 7 of the Endangered Species Act.

A letter dated June 16, 2008, from the East Lansing Field Office of the U.S. Fish and Wildlife Service provided comments on the draft plan preferred alternative in relation to section 7 of the Endangered Species Act (this letter is reprinted on the following pages). This office concurred with the NPS determination that implementing the preferred alternative

may affect but not likely adversely affect Pitcher’s thistle, Michigan monkey flower, piping plover or piping plover critical habitat. Effects of the proposed alternative are considered insignificant, discountable, or beneficial. This precludes the need for further action on this project as required under section 7 of the Act.

They noted, however, that if the project plans change or elements of the preferred alternative are modified, consultation should be reinitiated.

The National Park Service contacted the U.S. Natural Resources Conservation Service regarding prime and unique farmlands in two counties in letters dated May 9, 2006. The

Natural Resources Conservation Service replied in a letter dated May 18, 2006. National Lakeshore managers met with a representative from the Natural Resources Conservation Service on May 23, 2006, to discuss prime and unique farmlands and the planning process.

A letter dated June 9, 2008, from the Chicago office of the Environmental Protection Agency provided comments on the draft plan. This office rated the draft plan preferred alternative as “LO (Lack of Objection).” (This letter is reprinted on the following pages.)

## STATE AGENCIES

The National Park Service contacted the Michigan state historic preservation officer in a letter dated February 16, 2006. The letter advised this office about the start of this planning process, asked for its involvement in the planning process, and solicited input on issues and concerns to be addressed by the plan. No written response was received. On March 27 and September 4–5, 2007, National Lakeshore managers met with representatives from the Michigan state historic preservation office to discuss the planning process and historic properties within the National Lakeshore.

A letter dated July 7, 2008, from Brian Conway, the state historic preservation officer (in the Michigan Department of History, Arts, and Libraries in Lansing, Michigan) provided comments on the draft plan (this letter is reprinted on the following pages). Mr. Conway stated that

Based on the information provided for our review, it is the opinion of the State Historic Preservation Officer (SHPO) that the preferred alternative identified in the GMP does not meet the criteria of adverse effect [36CFR section 800.5(a)(1)] and will have no adverse effect [36CFR section 800.5(b)] on

historic properties within the area of potential effects . . . .

The National Park Service contacted the Chief of the Coastal Zone Management Program (Michigan Department of Environmental Quality) in a letter dated May 9, 2006. This office responded with a letter on June 8, 2006. Lakeshore managers met with representatives from the Michigan Departments of Natural Resources and Environmental Quality on April 2, 2007, to discuss the planning process. The Michigan Coastal Zone Management Program was provided the opportunity to review and concur with the *General Management Plan / Wilderness Study / Environmental Impact Statement*.

A letter dated June 23, 2008, from the state Department of Environment Quality provided comments on the draft plan (this letter is reprinted on the following pages). This office stated

[W]e strongly support the Preferred Alternative . . . . The Preferred Alternative strikes a good balance between protecting sensitive coastal resources and providing ample opportunity for visitor access and recreation. Activities such as controlling invasive species, protecting open dune areas, restoring disturbed sites, and protecting threatened and endangered species are all consistent with the goals of the Coastal Management Program and the DEQ.

This office also noted that there were activities identified in the preferred alternative that will require state permits.

A letter dated June 9, 2008, from the state Department of Natural Resources provided comments on the draft plan (this letter is reprinted on the following pages). This office

supports the work of the NPS and their planning partners in the development of



the “Preferred Alternative,” and we endorse that recommendation. The preferred plan is the result of a planning process that demonstrated an impressive effort to engage the public and stakeholders.

## AMERICAN INDIAN TRIBES

The National Park Service contacted the following five American Indian tribal groups in a letter dated February 16, 2006: Bay Mills Indian Community, Grand Traverse Band of Ottawa and Chippewa Indians, Little River Band of Ottawa Indians, Little Traverse Bay Bands of Odawa Indians, and Sault Ste. Marie Tribe of Chippewa Indians. The NPS letter advised the tribes of the planning process, invited them to participate in planning, and inquired about the tribes’ potential interests and concerns as they relate to the planning effort. No written responses from the tribes were received. NPS staff placed follow-up phone calls to each tribal group on June 14 and July 13, 2006, to make sure the tribal groups received the letters and to ask if they had questions or wished to meet to discuss the planning effort.

On July 18, 2006, Lakeshore managers met with representatives of the Grand Traverse Band of Ottawa and Chippewa Indians to discuss the *General Management Plan / Wilderness Study / Environmental Impact Statement* and other matters of mutual interest. During that meeting, the Grand Traverse Band representatives explained that the other tribal groups had authorized them (Grand Traverse Band) to represent the other

tribal groups in the National Lakeshore’s planning process. On August 1, 2006, the National Park Service sent a letter to each of the five tribal groups summarizing the NPS understanding of this arrangement. In August 2006, the Grand Traverse Band reviewed the National Lakeshore’s draft interpretive themes and provided input to ensure that the statements appropriately reflect values and stories related to American Indian culture and affiliation with the National Lakeshore. Informal comments were received and incorporated. On March 16, 2007, the National Park Service sent a letter to the Grand Traverse Band and offered to present the preliminary alternatives and answer any questions. On April 10, National Lakeshore staff met with a representative from the Grand Traverse Band to present and discuss the preliminary alternatives. On May 14, 2007, the National Lakeshore received a comment letter from the Grand Traverse Band. The National Lakeshore provided clarification and response in a letter dated May 31, 2007, and requested a follow-up meeting to discuss the Grand Traverse Band’s comments in more detail. That meeting was held on June 7, 2007.

A letter dated June 18, 2008, from the Grand Traverse Band of Ottawa and Chippewa Indians provided comments on the draft plan (this letter is reprinted on the following pages). The tribe fundamentally supported the preferred alternative because it “provides a good mix of enjoyment opportunities to the public as well as resource protection,” although slight modifications were suggested. The tribe expressed interest in continued communication with NPS staff.

## **LIST OF AGENCIES OR ENTITIES RECEIVING A COPY OF THIS PLAN**

### **FEDERAL AGENCIES**

Advisory Council on Historic Preservation  
Federal Aviation Administration  
Isle Royale National Park  
Keweenaw National Historic Park  
Natural Resources Conservation Service  
Pictured Rocks National Lakeshore  
U.S. Army Corps of Engineers  
U.S. Bureau of Land Management  
U.S. Coast Guard  
U.S. Department of Agriculture, Forest Service  
U.S. Department of Labor – Occupational Safety and Health Administration  
U.S. Environmental Protection Agency  
U.S. Fish and Wildlife Service

### **AMERICAN INDIAN TRIBAL GOVERNMENTS**

Bay Mills Indian Community  
Grand Traverse Band of Ottawa and Chippewa Indians  
Hannahville-Potawatomi Indian Community  
Keweenaw Bay Indian Community  
Lac Vieux Desert Band of Lake Superior Chippewa Indians  
Little River Band of Ottawa Indians  
Little Traverse Bay Bands of Odawa Indians  
Nottawaseppi Huron Band of Potawatomi  
Pokagon Band of Potawatomi Indians  
Saginaw Chippewa Indian Tribe  
Sault Ste. Marie Tribe of Chippewa Indians

### **U.S. SENATORS AND REPRESENTATIVES**

Honorable Carl Levin, Senator  
Honorable Debbie Stabenow, Senator  
Honorable Dave Camp, House of Representatives  
Honorable Peter Hoeskstra, House of Representatives

Honorable David E. Bonior, House of Representatives  
Honorable Carolyn Cheeks Kilpatrick, House of Representatives  
Honorable John Conyers, Jr., House of Representatives  
Honorable Vernon J. Ehlers, House of Representatives  
Honorable Dale E. Kildee, House of Representatives  
Honorable Joe Knollenberg, House of Representatives  
Honorable Sandy Levin, House of Representatives  
Honorable Lynn N. Rivers, House of Representatives  
Honorable Mike Rogers, House of Representatives  
Honorable Nick Smith, House of Representatives  
Honorable Fred Upton, House of Representatives

### **STATE OFFICIALS, SENATORS, AND REPRESENTATIVES**

Honorable Jennifer M. Granholm, Governor  
State Representative David Palsrok  
State Senator Jason Allen  
State Senator Dan L. DeGrow  
State Senator Michelle McManus

### **STATE AGENCIES AND COMMISSIONS**

State of Michigan  
Coastal Management Program  
Cultural and Economic Development  
Department of Agriculture  
Department of Environmental Quality  
Department of History, Arts, and Libraries  
Department of Natural Resources  
Department of Transportation — Traverse City Transportation Service Center

Historian  
Historical Center  
Historic Preservation Office  
Natural Features Inventory  
Natural Resources Commission  
Water Resources Commission

## **REGIONAL, COUNTY, AND LOCAL GOVERNMENTS**

Almira Township  
Benzie Conservation District  
Benzie County Administrator  
Benzie County Clerk  
Benzie County Commissioners  
Benzie County Planning Commission  
Benzie County Sheriff's Office  
Benzie County Road Commission  
Benzie County Treasurer  
Benzie County Parks and Recreation  
Benzonia Township  
Bingham Township  
Blaine Township Hall  
Centerville Township  
Cleveland Township  
Colfax Township  
Crystal Lake Township  
Empire Township  
City of Frankfort  
Gilmore Township  
Glen Arbor Township  
Grand Traverse County  
Homestead Township  
Inland Township  
Joyfield Township  
Kasson Township  
Lake Township  
Leelanau Conservation District  
Leelanau County Administrator  
Leelanau County Clerk  
Leelanau County Commissioners  
Leelanau County Road Commission  
Leelanau County Sheriff's Department  
Leelanau County Planning Commission  
Leelanau County Treasurer  
Leelanau Township  
Manistee County Commission  
Metroparks of the Toledo Area

Northwest Michigan Council of Governments  
Northwest Michigan Regional Planning  
Platte Township  
Solon Township  
Spring Township  
Suttons Bay Township  
Village of Benzonia  
Village of Beulah  
Village of Elberta  
Village of Empire  
Village of Northport  
Weldon Township

## **ORGANIZATIONS, BUSINESSES, AND UNIVERSITIES**

AAA Michigan  
Advocates for Safe Drinking Water and Lakes  
Air Foundation  
Arts Council of Greater Grand Rapids  
Bay Area Transit Authority  
Benzie Area Historical Society  
Benzie Audubon Club  
Benzie County Chamber of Commerce  
Benzie Fishery Coalition  
Benzie Soil and Water Conservancy  
Campaign for America's Wilderness  
Cedar Rod & Gun Club  
Center for Biological Diversity  
Cherry Capitol Paddle America Club  
Citizen's Council of the Sleeping Bear Dunes  
Area  
Citizens for Access to the Lakeshore  
Citizens for Positive Planning  
Conservation Resource Alliance  
Crystal Lake Watershed Association  
Crystal Mountain  
Eastern National  
Empire Area Museum  
Empire Lions Club  
Frankfort-Elberta Chamber of Commerce  
Friends of Sleeping Bear Dunes  
Friends of the Crystal River  
George Wright Society  
Glen Arbor Art Association  
Glen Lake Chamber of Commerce  
Grand Traverse Audubon Club  
Grand Traverse Bay Watershed Initiative

Grand Traverse Conservancy  
Grand Traverse Convention and Visitors  
Bureau  
Grand Traverse Hiking Club  
Grand Valley State University  
Great Lakes Natural Resource Center  
Green Party  
Izaak Walton League  
Kalamazoo Nature Center  
Land Information Access Association  
Leelanau Chamber of Commerce  
Leelanau Conservancy  
Leelanau Democratic Party  
Leelanau Historical Society  
Leelanau Scenic Heritage Route  
Leelanau-Kohahna Foundation  
Manitou Islands Memorial Society  
Michigan Association of Builders  
Michigan Association of Realtors  
Michigan Audubon Society  
Michigan Chamber of Commerce  
Michigan Council of Hostelling International  
Michigan Environmental Council  
Michigan Historical Council  
Michigan Hotel, Motel, and Resort  
Association  
Michigan Land Use Institute  
Michigan Mountain Biking Association  
Michigan State University  
Michigan Technological University  
Michigan Travel Bureau  
Michigan United Conservancy  
MSU Cooperative Extension Service  
MSU Extension  
National Parks and Conservation Association  
Natural Resources Defense Council  
Northern Michigan Environmental Action  
Council  
Northwestern University  
Preserve Historic Sleeping Bear  
Public Employees for Environmental  
Responsibility  
Save Leelanau Farmland!  
Shielding Tree Nature Center  
Sierra Club  
Student Conservation Association  
The Biodiversity Project  
The Homestead  
The Nature Conservancy

The Wilderness Society  
Traverse City Chamber of Commerce  
Wayne State University  
West Michigan Environmental Action  
Council  
Western Land Exchange Project  
University of Arkansas  
University of Michigan  
University of Nebraska

## **LIBRARIES**

Alpena County Library  
Benzie Shores District Library  
Beulah Public Library  
Glen Lake Community Library  
Leelanau Township Library  
Leland Township Library  
Library of Michigan  
Suttons Bay Area Public Library  
Traverse City District Library

## **SCHOOL DISTRICTS**

Glen Lake School District  
Leelanau School  
Traverse Bay Area – Intermediate School  
District

## **HOMEOWNER'S ASSOCIATIONS**

Crystal Lake Association  
Glen Lake Association  
Homestead  
Little Platte Lake Association  
Little Traverse Lake Association  
Platte Lake Improvement Association  
Platte River Homeowner's Association

## **CONCESSIONERS AND IN-PARK BUSINESSES**

Blough Firewood  
Camp Leelanau-Kohahna  
Commission for the Blind

Crystal River Outfitters  
Manitou Island Transit  
Riverside Canoe Livery  
Trading Post

## **NEWSPAPERS AND MAGAZINES**

Albion Pleiad  
Ann Arbor News  
Antrim County News  
Benzie Record Patriot  
Booth Newspapers  
Cassopolis Vigilant/Edwardsburg Argus  
Central Michigan Life  
Chelsea Standard  
Chicago Sun-Times  
Compass Newspaper  
County Press  
Crains Detroit Business  
Crawford County Avalanche  
Daily Mining Report  
Daily News  
Daily Press  
Daily Reporter  
Daily Tribune  
Dearborn Press & Guide  
Detroit Free Press  
Detroit News  
Dowagiac Daily News  
Exponent  
Ferris State Torch  
Flint Journal  
Gazette  
George Weeks, Columnist  
Gladwin County Record  
Glen Arbor Sun  
Grand Haven Tribune  
Grand Rapids Press  
Grand Traverse Herald  
Grand Traverse News  
Grand Valley Lanthorn  
Herald-Palladium  
Holland Sentinel  
Houghton Lake Resorter  
Ironwood Daily Globe  
Kalamazoo Gazette  
Kalkaskian  
Lansing State Journal

Leelanau Enterprise  
Ludington Daily News  
Mackinac Town Crier  
Macomb Daily  
Manchester Enterprise  
Marlette Leader  
Metro Times  
Michigan Chronicle  
Midland Daily News  
Mining Journal  
Monroe Evening News  
Monroe Guardian  
Montmorency County Tribune  
News-Herald  
News-Sentinel  
Niles Daily Start  
Northern Express  
Northwoods Call  
Oakland Press  
Observer Eccentric  
Oceana's Herald-Journal  
Penasee Globe  
Pioneer Times  
P R Newswire  
Romeo Observer  
Saline Reporter  
Spinal Column Newsweekly  
State News  
Straitsland Resorter  
Student Movement – Andrews University  
Sturgis Journal  
The South End, Wayne State University  
The Technical, Kettering University  
Times Herald  
Town Meeting  
Travel & Outdoor  
Travel & Outdoor Features  
Traverse City Record Eagle  
Traverse—The Magazine  
View  
Voice News  
Ypsilanti Courier

## **RADIO AND TELEVISION STATIONS**

BNZ Radio  
Voice News  
Cadillac Evening News

CHAPTER 6: CONSULTATION AND COORDINATION

Community Calendar, TV

Evening News

Interlochen Public Radio

The Outdoor Network

WBKP

WFUM-Michigan Television – U of M

WGTU/WGTQ 29/8

WGVU

WILX

WJBK FOX-2

WKAR

WLNS NewsCenter 6

WLUC-TV 6

WNEM

WOOD TV 8

WOTV

WPBM-WTON TV 7 & 4

WTCM News

WWTV-WWUP 9 & 10

WZPX TV-43

WZZM TV-13

## COMMENTS ON, CHANGES TO, AND RESPONSES TO COMMENTS ON THE DRAFT PLAN

### COMMENTS ON THE DRAFT PLAN

The *Draft General Management Plan / Wilderness Study / Environmental Impact Statement* was made available for public review in mid April, 2008. The public comment period ended on June 15, 2008. A postcard announcing that the document would be available was sent to approximately 2,500 people. Following response to the postcard, the document was sent to about 700 individuals, organizations, agencies, and tribes. The draft document was also posted on the Web and distributed at meetings. Nearly 300 comments on the draft plan were received.

### KEY CHANGES TO THE PREFERRED ALTERNATIVE

In response to comments on the draft plan, the following key changes were made.

#### 1. *Changes in Inland Lake Boating*

The original text (pg. 54, second column of the draft plan, first full bullet on Inland Lake Use and Access) said

- Inland Lake Use and Access — Motorized boats would be allowed on School and Loon lakes. Motorized boats would no longer be allowed on Bass (Leelanau County) and North Bar lakes. Access for nonmotorized boats would be improved at a few inland lakes (locations to be determined).

The decision was made to no longer allow motorboats only on North Bar Lake (to improve visitor experiences for nonmotorized uses such as canoeing, kayaking, fishing, and swimming). Boats with electric motors would be allowed in the experience nature zone on

Bass Lake (Leelanau County), Tucker Lake, and Otter Lake to increase the range of visitor opportunities that are compatible with the intent of this zone.

Therefore, the revised text in this final plan (the bullet on Inland Lake Use and Access) now reads:

- Inland Lake Use and Access — Motorized boats would be allowed on School and Loon lakes. Motorized boats would no longer be allowed on North Bar Lake. Electric motors would be allowed in the experience nature zone on Bass Lake (Leelanau County), Tucker Lake, and Otter Lake. Access for boats would be improved at a few inland lakes (locations to be determined).

Changes were made in the appropriate places throughout the document (e.g., environmental consequences chapter) to reflect these changes.

#### 2. *Minor Change in Wilderness Proposal*

Based on public comment, the decision was made to exclude the Cottonwood Trail area from the wilderness proposed on the Sleeping Bear Plateau. The Cottonwood Trail area is one of three trails into the namesake dunes, and it is used by school and other groups of up to 100 people, which is not consistent with wilderness values.

Accordingly, the wilderness proposal for the preferred alternative was reduced to 32,100 acres or 45% of the National Lakeshore.

### 3. *Benzie Corridor Language*

Based on public comment, the word “purchase” was replaced with “acquire” for the language about lands in the Benzie Corridor (as shown below) to clarify that donation, easements, etc. would also be considered. (This same change was made in the no-action alternative and in alternatives B and C).

The National Park Service would continue to acquire lands within the Benzie Corridor on a willing-seller basis (subject to available funding) for future development of a scenic road and/or a bike/hike trail (determined and evaluated via a future study).

- question, with reasonable basis, the accuracy of information in the environmental impact statement
- question, with reasonable basis, the adequacy of the environmental analysis
- suggest different viable alternatives
- cause changes or revisions in the proposal

Comments in favor of or against the preferred or other alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

Although the planning team is obligated only to respond to substantive comments, it has also responded to selected nonsubstantive comments for various reasons (e.g., politics, numbers of people responding, and the need to clarify the agency position).

### 4. *Table 3*

The Shalda Cabin in the preferred alternative was changed from the experience nature zone to the recreation zone (to be consistent with the 7th bullet under recreation zone in appendix D). The Kraitz Cabin was removed from table 3 completely because it has not yet been determined eligible for the national register. The “Lyle Schmidt Barn (1)” was changed to the “Lyle Schmidt Farm (3)” to reflect the actual number of structures there. Accordingly, corresponding figures in the table and in other locations throughout the document were updated.

Letters, Web comments, e-mails, and meeting transcripts are a part of the project administrative record.

On the following pages, first the comments from organizations and individuals and NPS responses are presented. These are organized by topic, such as access, Benzie Corridor, etc. Following that are reproductions of comment letters from agencies and organizations, with substantive comments bracketed and NPS responses provided.

## RESPONSES TO COMMENTS ON THE DRAFT PLAN

Letters and Web comments from federal and state agencies and from tribes are reprinted in full, along with NPS responses to substantive comments. Other substantive comments (from organizations and individuals) are paraphrased, and NPS responses are provided. Comments are substantive if they do the following:

### Access

**COMMENT:** Make existing NPS facilities more accessible to visitors with mobility impairments.

**RESPONSE:** In all development planning, the National Lakeshore considers ways to provide opportunities for visitors with limited mobility. Developments proposed in the near future at Glen Haven include improved parking, picnicking, and beach access facilities, and these facilities will be



accessible to those with disabilities. The National Park Service strives to maintain a balance between development and resource protection. Accessible picnic areas are found at the Platte River picnic area, along the Pierce Stocking Scenic Drive, and at the County Road 669 and 651 road ends. The Platte River campground is fully accessible, and the more rustic D.H. Day campground is accessible with assistance. Please refer to the “Accessibility to the National Lakeshore” subheading under the “Desired Conditions and Strategies” heading in chapter 1.

**COMMENT:** Share information regarding improvements to Tiesma Road and associated lakeshore access.

**RESPONSE:** The *General Management Plan* alternatives include no specific plans or proposals to improve Tiesma Road or associated access; however, the preferred alternative calls for Tiesma Road to remain open and allows for improvements to be made.

### **Benzie Corridor**

**COMMENT:** The National Lakeshore’s establishing legislation (Public Law 91-479) allows for a scenic road along the Benzie Corridor, but not for a hike/bike trail.

**RESPONSE:** Congressional action would be needed to allow for either removal of the Benzie Corridor (as in alternative A) or development of a hike/bike trail alone (alternative C). Congressional action may be needed to implement the preferred alternative if a scenic road is not included in the ultimate decision.

**COMMENT:** The National Park Service should consider multiple means of acquisition within the Benzie Corridor other than purchase in fee simple, such as donations and easements. The National

Park Service should also consider partnerships as a means of providing public access within or to the corridor.

**RESPONSE:** In the preferred and no-action alternatives, and alternatives B and C, the term “purchase” has been changed to “acquire” in the final plan, to clarify that acquisition of less-than-fee interest (e.g., easements), as well as other means of acquisition, such as donation, would be considered by the National Park Service. Property within the Benzie Corridor would be acquired only from willing sellers.

### **Boundary Adjustments**

**COMMENT:** North Fox Island and South Fox Island should be added to the National Lakeshore.

**RESPONSE:** As part of the GMP process, the planning team assessed the Fox Islands as a potential addition to the National Lakeshore boundary (see appendix B) and concluded that these islands do not meet NPS criteria for boundary adjustments.

### **Historic Resources**

**COMMENT:** Historic properties within designated wilderness will end up receiving less preservation treatment than those outside wilderness. Historic properties located in management zones other than the experience history zone will not be adequately preserved.

**RESPONSE:** All alternatives in the *Draft General Management Plan / Wilderness Study* specify preservation of all historic properties regardless of management zone or proposed wilderness.

NPS management policies for wilderness preservation and management are outlined in chapter 6 of *NPS Management Policies 2006*. Section 6.3.8, “Cultural Resources,” states that “cultural resources that have

been included within wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources using management methods that are consistent with the preservation of wilderness character and values. These laws include the Antiquities Act and the Historic Sites, Buildings and Antiquities Act, as well as subsequent historic preservation legislation, including the National Historic Preservation Act, the Archaeological Resources Protection Act, and the Native American Graves Protection and Repatriation Act.”

Historic properties within proposed wilderness at the National Lakeshore are to be maintained in keeping with wilderness principles that limit the use of wheeled vehicles and motorized equipment to only those instances where they are the minimum tool necessary to accomplish the desired preservation goal. The National Lakeshore staff has already been successfully preserving historic structures in proposed wilderness for many years, and will continue to do so. The minimum tool requirement occasionally makes preservation maintenance less convenient, but this does not mean the properties receive a lesser degree of preservation treatment. See the “Resource Management and Research” subheading under the “Implications of Managing Lands Proposed for Wilderness” heading in chapter 3.

As outlined in the introduction to the “Management Zones” heading of chapter 2, in every management zone the National Lakeshore intends to preserve and protect natural and cultural resources to the greatest extent possible given available funds. The experience history zone does not confer a higher priority for preservation treatment of structures compared to other zones. It does, however, contain some of the highest priority

resources — those identified as fundamental resources.

**COMMENT:** Three structures in the Glen Haven Village Historic District need to be reevaluated for their eligibility for the national register.

**RESPONSE:** There are three structures in Glen Haven (Wickland House, Dean House, and Rude Garage) that have been reviewed and determined ineligible for the National Register of Historic Places (that is, they are nonhistoric). The Michigan state historic preservation officer has written to the National Lakeshore suggesting that these structures be reevaluated before any actions on them are undertaken. The National Lakeshore staff plans to do so.

**COMMENT:** The “Prominent Historical Resources Base Map” in chapter 4 has omissions, including the Newhall cottage and shed, the Lake Manitou privy and bathhouse, and Beuham orchard on North Manitou Island; the Minger Cabin near School Lake; the D.H. Day cultural landscape; certain archeological sites; and the Empire Air Base housing.

**RESPONSE:** The map of historic resources was not intended to be an exhaustive depiction of all such resources — simply the most prominent ones. As such, there are several historic resources not shown on the map. As for the specific historic structures and landscapes listed in the comment, although the National Lakeshore continues to preserve them in the interim, formal determinations of eligibility have yet to be made. Archeological sites are not generally shown on NPS maps due to their sensitivity, fragile nature, and the potential for vandalism or looting.

**COMMENT:** The footnote in “Table 3: Range of Treatment for Historic Properties under the Alternatives,” indicates that the list in the table shows buildings, but does not include landscape features such as fence rows, cemeteries, sidewalks, etc. They should be included because the footnote also says that all landscapes are preserved.

**RESPONSE:** All historic features, from fence rows to buildings, are to be preserved. The intent of table 3 was to respond to this concern by comparing the range of possible treatments for the buildings across the alternatives. The range of treatments for landscapes associated with the buildings is the same as shown for the buildings. All cultural landscape features are to be preserved.

**COMMENT:** In chapter 2, table 3, the number in parentheses in some cases does not match the actual number of structures that exists in a district.

**RESPONSE:** The table 3 numbers for Lyle Schmidt Farm have been corrected in the final plan. The table reflects structures that have been determined eligible for the national register. There are other potentially eligible resources for which formal determinations of eligibility have yet to be made; these are not shown.

**COMMENT:** Why isn’t the “Historic Properties Management Plan” mentioned under the chapter 1 heading “Relationship of the General Management Plan to Other Planning Efforts”?

**RESPONSE:** The “Draft Historic Properties Management Plan” was placed on hold in 1999. Following completion of the *General Management Plan*, it may be appropriate to resume it. The “Relationship of the General Management Plan to Other Planning Efforts” discussion addresses only planning efforts that have been completed or are currently underway.

**COMMENT:** It is not appropriate to specify, by management zone, a range of treatment for historic structures.

**RESPONSE:** NPS *Management Policies 2006* indicate that it is, in fact, appropriate to specify particular treatments or ranges of treatments for historic properties by management zone: “Delineation of management zones will illustrate where there are differences in intended resource conditions, visitor experiences, and management activities” (section 2.3.1.2). “Decisions regarding which treatments will best ensure the preservation and public enjoyment of particular cultural resources will be reached through the planning and compliance process . . .” (section 5.3.5). “The relative importance and relationship of all values will be weighed to identify potential conflicts between and among resource preservation goals, park management and operation goals, and park user goals. Conflicts will be considered and resolved through the planning process . . .” (section 5.3.5).

## Management Zones

**COMMENT:** There’s an error in the maps for the action alternatives. The orange recreation zone strip around the islands and mainland should be the darker orange (for water), not the lighter (for land).

**RESPONSE:** In the final plan, the colors have been corrected to match the legend as suggested. For graphic simplicity, the thin strip of active Lake Michigan beach area, which is part of this recreation zone, has not been shown separately.

## Natural Resources

**COMMENT:** Applying the recreation zone to all Lake Michigan beaches in the National Lakeshore threatens fragile beach landscapes, endangered species, and habitats adjacent to them.

**RESPONSE:** The recreation zoning of Lake Michigan beaches reflects the NPS intent to continue to allow recreational motorboat access within the 0.25 mile of Lake Michigan waters within the National Lakeshore boundary. The recreation zone would be applied to active Lake Michigan beach areas, which are essentially bare sand areas that are washed by waves, but not the adjacent foredune. By their very nature, active beaches lack stabilizing vegetation and are not vulnerable to formation of lasting informal trails. With the exception of steep bluff slopes, these are the same resilient sand areas commonly used by visitors for sunbathing, sand play, and beach strolling. The National Lakeshore has a demonstrated history of protecting nesting piping plovers and their critical habitat in these areas in consultation with the U.S. Fish and Wildlife Service.

**COMMENT:** Dredging of the Platte River (discussed in chapter 5 under the "Cumulative Impacts" heading) should be stopped altogether because the impacts of dredging are not consistent with the purpose of the National Lakeshore.

**RESPONSE:** The question of whether dredging of the Platte River mouth (for recreational motorboat access) should be continued is closely related to the question of whether a new boat ramp should be developed within the high use zone near the mouth of the Platte River. The purpose of the dredging is to provide recreational boating and fishing access to Lake Michigan in September during the salmon run. As stated in the preferred alternative, a separate environmental impact statement would be needed to determine whether there may be alternatives for providing this access in a way that lessens impacts to resources and visitors' experiences. Such a study would consider a number of alternatives, and the environmental, safety, visitor opportunity, and other impacts of

implementing those alternatives. Cessation of dredging would likely be a component of one or more of these alternatives. The National Park Service will not make a decision on this topic until such a study, conducted with opportunities for public input, is completed.

**COMMENT:** The preferred alternative's proposal to improve the Glen Lake picnic area (to facilitate beach and picnic use) would have natural resource impacts. Examples include impacts to nesting geese, siting a well and septic system, and compliance with state environmental and other regulations.

**RESPONSE:** The impacts of improving the Glen Lake picnic area have been considered broadly in chapter 5 of this *General Management Plan / Wilderness Study / Environmental Impact Statement*. Specific design details for improvements would be developed subsequent to this *General Management Plan*. Potential impacts on wildlife and other natural and cultural resources would be considered in more detail during the design phase. Facility improvements would comply with state and other applicable regulations.

**COMMENT:** There would be serious impacts associated with a boat launch on Platte Bay, including impacts to Pitcher's thistle and piping plover.

**RESPONSE:** Potential impacts from development of a boat launch facility on Platte Bay would be thoroughly analyzed in an environmental impact statement prior to any such project. This analysis would include consultation with other agencies as appropriate, including the U.S. Fish and Wildlife Service regarding potential impacts to threatened and endangered species and critical habitat.

**COMMENT:** The preferred alternative's proposal for improvements to Esch Beach

parking would have undesirable impacts. Examples include potential changes to the area's character, natural resource impacts, and increased use.

**RESPONSE:** Currently, parking at Esch Beach takes place on road shoulders within the county road right-of-way. This parking results in congestion, resource damage, safety concerns, and difficult access to the beach for visitors and emergency vehicles. Improvements to Esch Beach parking have yet to be designed, but would be developed in consultation with the county and would address these issues while minimizing resource impacts. Slight changes to the area's character may result, but mitigation measures would be taken to minimize such changes. Improvements would be designed to better accommodate existing levels of frequently recurring use, not peak use. The facilities would not create more demand, but would help address current demand. However, the National Park Service does not control county road rights-of-way, so parking could occur along road shoulders even after improvements are made. Increased use may occur regardless of NPS actions.

## Planning Foundation

**COMMENT:** Suggestions were made either to include cultural resources in the National Lakeshore's purpose statement, or to list the NPS Organic Act (which mentions preservation of historic resources) in or directly under the purpose statement in the plan. It was also suggested that not including cultural resources in the National Lakeshore's purpose statement jeopardizes the National Lakeshore's ability to compete for funding to preserve cultural resources.

**RESPONSE:** A park unit's purpose statement, simply stated, is the reason a specific park was designated by Congress. The purpose of Sleeping Bear Dunes National Lakeshore was clearly specified by

Congress in the 1970 legislation that established the National Lakeshore; that purpose does not include cultural resources.

A park unit's purpose statement does not replace or lessen the impact of the National Park Service's mission. Rather, it focuses the agency's management role at a particular park unit. (The focus of management is different at Carlsbad Caverns National Park than at Gettysburg National Military Park, for example.) A park's purpose statement also does not permit the National Park Service to ignore the requirements of federal legislation, such as the NPS Organic Act, National Historic Preservation Act, the Archeological Resources Protection Act, or the Native American Graves Protection and Repatriation Act. The National Lakeshore's cultural resources are protected by these laws, and by the *General Management Plan's* specifically stated intent to preserve them.

Adding cultural resources to the National Lakeshore's purpose would offer no additional protection or funding for cultural resources beyond what is currently provided. The National Lakeshore has competed successfully for cultural resource preservation funding despite the fact that neither the enabling legislation for the National Lakeshore nor the existing *General Management Plan* list cultural resources as part of the National Lakeshore's purpose. There is no reason to expect this to change.

The NPS Organic Act is prominently stated in the "Servicewide Laws and Policies" heading of chapter 1. In addition, the relationship between the National Lakeshore's purpose and the NPS Organic Act has been clarified in the introductory paragraph of the "Purpose" section earlier in chapter 1.

**COMMENT:** The planning team created the definition of “fundamental resources and values.” The term and the list of fundamental resources and values were not vetted with the public.

**RESPONSE:** The planning team used the National Park Service's agency-wide definition of fundamental resources and values. The *NPS General Management Planning Dynamic Sourcebook* defines fundamental resources and values as “features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to warrant primary consideration during planning and management because they are critical to achieving the park’s purpose and maintaining its significance.”

*Newsletter #2* (published in May 2006) presented the draft foundation for planning and management, which included the definition of fundamental resources and values and a list of fundamental resources and values for Sleeping Bear Dunes National Lakeshore. The public was encouraged to read and comment on this newsletter. *Newsletters #3* and *#4* also made reference to fundamental National Lakeshore resources and these newsletters were made available for public review. After reviewing all of the public comments received in response to the newsletters, the planning team found no compelling reason to modify the list of resources (natural, cultural, and recreational) identified as fundamental.

**COMMENT:** The National Lakeshore's list of fundamental resources and values should be expanded to include more of the National Lakeshores resources, particularly its cultural resources.

**RESPONSE:** The following excerpt from the *NPS General Management Planning Dynamic Sourcebook* (2008) explains why the National Lakeshore’s list of

fundamental resources and values is not more comprehensive:

Park managers are continually challenged to set priorities and allocate limited funding and staffing to adequately protect what is most important about a park while at the same time complying with the full array of legislative mandates, laws, and policies that cover all park resources and values. . . . In identifying the fundamental resources and values deserving primary consideration during planning and management, restraint is critical. The resulting list is useful only if it focuses on those relatively few things that are so important that they should be the preeminent considerations in all park planning and decision making. The list of resources and values should not be interpreted as everything that is important about the park, or even everything that is nationally significant. It should be a relatively short list of resources or values considered to be critical to achieving the park's purpose and maintaining its significance. Identifying fundamental resources and values helps ensure that planning is focused on what is truly most significant about the park. It creates a tool that park managers and staffs can use to focus planning and management on highly significant resources and values and ensure that all the resources and values warranting preeminent consideration are adequately protected.

Although a few people suggested that ALL cultural resources should be shown as fundamental, this would defeat the purpose outlined above. If all resources are fundamental, it would be very difficult for a manager to prioritize during times of scarce funding.

## Planning Process, Law, and Policy

**COMMENT:** All four action alternatives place the Lake Michigan beaches in the recreation zone; why isn't there more diversity in terms of zoning these beaches?

**RESPONSE:** Many areas within the National Lakeshore are zoned identically across all action alternatives. In this case, the recreation zoning of Lake Michigan beaches reflects the NPS intent to continue to allow recreational motorboat access within the 0.25 mile of Lake Michigan waters within the National Lakeshore boundary. The recreation zone would be applied to active Lake Michigan beach areas, which are essentially bare sand areas that are washed by waves, but not the adjacent foredune. Because boat access from the water to the beaches is not causing any appreciable environmental impacts, and it would be extremely difficult to enforce a "no-beaching" rule, extending the recreational zoning established for the waters of Lake Michigan to the beaches themselves, allows this use to continue.

**COMMENT:** An asset management plan (mentioned in the "Implementation of the General Management Plan" discussion in chapter 2) provides a vehicle for NPS management to reverse decisions made in the *General Management Plan*, especially with regard to preservation of historic structures.

**RESPONSE:** Asset management plans follow the direction given in general management plans; they do not reverse it.

The National Park Service defines assets as physical structures or groupings of structures, land features, or other tangible properties having a specific service or function. Examples include roads, trails, buildings, and utility systems.

The NPS asset management program is designed to address several key questions:

- What assets does the park own?
- What is the condition of each asset?
- What is the current replacement value of each asset?
- What is required to properly sustain the assets over time?
- What assets are the highest priorities relative to the park mission, and where should a park focus resources?

Properly caring for assets throughout their useful life cycle saves resources in the long run. Asset management practices help parks clearly prioritize, reduce, and manage deferred maintenance; improve the overall condition of assets; better predict and justify future budget requests; anticipate maintenance needs; plan accordingly; and fix problems before they become expensive emergencies.

**COMMENT:** The Port Oneida Rural Historic District needs its own management plan within the preferred GMP alternative.

**RESPONSE:** Ideally, Port Oneida would have a comprehensive management plan, one of many such plans needed for the National Lakeshore. Such a plan would be consistent with the management direction in the approved *General Management Plan*. Some decisions have been made regarding Port Oneida already. For example, the *Port Oneida Rural Historic District Environmental Assessment* was completed, and a "Finding of No Significant Impact" was signed in June 2008. However, this environmental assessment only described and analyzed alternative locations for a visitor contact station and employee housing, alternative means of improving visitor access, and ways to interpret Port Oneida resources (see the chapter 1 heading "Relationship of the General Management Plan to Other Planning Efforts"). A cultural landscape management plan / environmental assessment for Port Oneida is also underway.

**COMMENT:** The plan should include “safe, off road parking at M-22 and the Platte River” because such had been proposed by the National Park Service in the past and the funds were appropriated by Congress to do so.

**RESPONSE:** The 1979 *General Management Plan* stated that the long-range goal for this area was to provide one canoe livery (operated under a concession contract), with picnic facilities and a central parking area IF the private properties at that intersection became available for acquisition. However, the National Park Service did not acquire all the properties. The 1992 *Platte River Management Plan* referenced the 1979 plan and called for “appropriate parking and safe access for visitors” desiring to use a canoe livery. The National Park Service subsequently addressed this in the 1990s by constructing a 42-car parking area at the Platte River picnic area and a pedestrian bridge for visitors to access Riverside Canoe Livery services. During the peak season (generally July and August), a congestion problem remains because the livery’s customers and employees park along county roads, including Birch Trail across the busy highway from the livery.

The 1999 Senate Report 105-227 contained language regarding appropriations toward mitigating a safety hazard associated with parking and access to the canoe livery, consistent with the *Platte River Management Plan*. The language in the report regarding the safety hazard was adopted into the Conference Report, but was not included in the appropriations bill. A fundamental rule of federal appropriations is that restrictions on lump sum appropriations that appear only in the legislative history of an appropriations act (such as the Conference Report) do not bind the agency on its spending of lump-sum appropriated funds. Because the provision for the parking lot does not appear in any appropriations act for the Department of

the Interior, the National Park Service is not required to use its discretionary funds to build a parking lot.

Parking for National Lakeshore visitors is currently available. Parking congestion during the roughly two months of peak use at the junction of M-22 and the Platte River is a direct result of customers and employees of the canoe livery. The National Park Service is not categorically opposed to the construction of a parking lot for use by visitors who use the canoe livery services. To build a parking lot, there must be a legal mechanism, such as a concession contract, that would enable this use of National Lakeshore lands.

**COMMENT:** Motorized boats must be allowed on Loon Lake because inland lakes are under the state of Michigan's legal jurisdiction.

**RESPONSE:** Motorized boats are allowed on Loon Lake in every alternative.

## Visitor Opportunities

**COMMENT:** Provide more bicycle opportunities in the National Lakeshore for both mountain bikes and road bikes. Provide a mountain bike area (such as Burnham Woods). Use a park trail near Otter Creek as a connector to county roads, creating a bicycle route from the Platte River campground to Empire. Add bike trails and bike concessions on the islands.

**RESPONSE:** Placing Burnham Woods in the recreation zone in the preferred alternative allows consideration of future use of this area by mountain bikes, pending planning and environmental analysis. The hiking trail south of Otter Creek Road (South Aral Road) is in an area zoned experience nature and proposed for wilderness in the preferred alternative. Allowing bicycles on this hiking trail west of Otter Lake would



negatively affect wilderness values. The M-22/M-109 hike/bike trail referred to in the preferred alternative would provide the desired connection between county roads. Currently, bicyclists can make the connection by accessing M-22 between Trails End and Esch Road. Most of North Manitou Island is proposed as wilderness, there are no county roads, and bicycling would not be allowed. Bicycles are permitted on county roads, including those on South Manitou Island, but there are no plans to develop a bicycle trail or concession operation on South Manitou Island.

**COMMENT:** The National Park Service should provide additional equestrian trails in the National Lakeshore.

**RESPONSE:** Equestrian use is currently allowed within the National Lakeshore on the Alligator Hill trail system and along state and county road rights-of-way. All of the *General Management Plan / Wilderness Study's* management zones (especially the recreation zone and experience nature zone) would allow for future consideration of additional horse trails, although none are specifically proposed in the preferred alternative. Wilderness proposal/designation does not preclude horse trails. Any future trail proposals would be subject to analysis of environmental impacts, per the National Environmental Policy Act of 1969.

**COMMENT:** The National Park Service's pet policy at the National Lakeshore should be changed.

**RESPONSE:** The pet policy is not a component of the *General Management Plan / Wilderness Study*; however, it is addressed in the "Superintendent's Compendium," which is a list of designations, closures, permit requirements, and other restrictions imposed under the discretionary authority of the park superintendent, as provided for in Title 36 of the *Code of Federal*

*Regulations*. The "Superintendent's Compendium" can be accessed via the National Lakeshore's website ([www.nps.gov/slbe](http://www.nps.gov/slbe)).

**COMMENT:** Designate a portion of the Lake Michigan beach as a "clothing optional" area.

**RESPONSE:** Michigan Penal Code 750.335a prohibits indecent exposure, which includes public nudity. It would therefore be inappropriate for the National Lakeshore to designate a "clothing optional" area.

**COMMENT:** Recreational hunting has no place at the National Lakeshore.

**RESPONSE:** The law that established the National Lakeshore in 1970 (Public Law 91-479) specifically permits hunting within the National Lakeshore (see "Special Mandates" discussion of chapter 1).

**COMMENT:** Noise impacts were not considered in the document. Noise levels (especially from trucks and motorcycles) are increasing, and this is affecting wildlife and recreational enjoyment. Are there any noise level regulations in the National Lakeshore?

**RESPONSE:** Impacts related to noise are analyzed for each of the alternatives in "Chapter 5: Environmental Consequences" under the "Visitor Opportunities and Use" heading, "Visitor Opportunities" subheading (reference natural sounds) and the "Natural Resources" heading, "Vegetation and Wildlife" subheading (reference sensory-based disturbance).

Most roads in the National Lakeshore are rights-of-way that are controlled by the Leelanau County and Benzie County road commissions; however, NPS regulations still apply. Title 36 of the *Code of Federal Regulations* (section 2.12) prohibits noise

exceeding 60 decibels, or making a noise that is unreasonable considering the nature and purpose of the actor's conduct, location, time of day or night, purpose for which the park was established, impact on park users, and other factors that would govern the conduct of a reasonably prudent person under the circumstances. Park rangers have the authority to enforce this regulation and do so as needed.

**COMMENT:** Consider allowing electric motors on all lakes.

**RESPONSE:** The preferred alternative has been revised to allow electric motors on Bass Lake (Leelanau County), Tucker Lake, and Otter Lake. A few lakes remain completely nonmotorized.

**COMMENT:** Provide visitor center services in the North district/Port Oneida area or Leland.

**RESPONSE:** Visitor services will be provided in Port Oneida (see "Port Oneida Rural Historic District Environmental Assessment" subheading of the "Relationship of the General Management Plan to Other Planning Efforts" heading in chapter 1 of this document).

## Wilderness

**COMMENT:** How and when did portions of the National Lakeshore come to be managed "so as to maintain their presently existing wilderness character"?

**RESPONSE:** Information about the legislative direction for wilderness studies and wilderness management at Sleeping Bear Dunes National Lakeshore is provided in chapter 1 under the "Purpose and Need for the Wilderness Study," discussion and in "Chapter 3: Wilderness Study and Proposal."

**COMMENT:** Some areas should not be included in the preferred alternative's wilderness proposal because they are routinely used by large school groups and guided tours.

**RESPONSE:** The preferred alternative's wilderness proposal was revised to remove the Cottonwood Trail to allow continued use by large groups without compromising solitude within designated wilderness. The Cottonwood Trail provides an opportunity for large groups to experience one of the National Lakeshore's fundamental resources, the namesake Sleeping Bear Dunes. Other areas either duplicate this opportunity or are not routinely needed by rangers for large group tours.

**COMMENT:** Networks of small roads used by motorized vehicles (including off-road vehicles and snowmobiles) contribute to trail damage, litter, and a decreased nature experience, and they seem incompatible with wilderness.

**RESPONSE:** For clarification, in the preferred alternative, all developed county road rights-of-way are excluded from wilderness. Off-road vehicles, including snowmobiles, are allowed only on county road rights-of-way and the shoulders of state highways. The National Lakeshore works with the county road commissions to minimize resource and visitor impacts associated with county roads. In developing the wilderness proposals associated with the various alternatives, the planning team considered what effect keeping the roads open and out of wilderness would have on the wilderness values and character of adjacent lands. Because some of the area proposed as wilderness in 1981 would be broken into small parcels surrounded by roads, the preferred alternative proposes about 600 fewer acres for wilderness (the area south of Trails End Road and east of Lasso/Peterson roads, and the area between Peterson and Tiesma roads) than the 1981 recommendation.

Chapter 5 considers impacts on wilderness character.

**COMMENT:** Congress would not be able to designate wilderness in the Bass Lake and Otter Lake areas (Benzie County) because these areas have county roads, docks, picnic tables, and restroom facilities.

**RESPONSE:** Neither Otter and Bass Lakes (Benzie County) nor the Trails End developed area is proposed for wilderness in any action alternative. In the no-action alternative, the lakes themselves are in proposed wilderness but the roads and facilities are not. In the preferred alternative, the proposed wilderness would be located west of these lakes. (See Preferred Alternative map).

### Other

**COMMENT:** The impact analysis of the management zoning for the M-22/M-109 hike/bike trail should include condemnation of adjacent private property; landform constraints on siting the hike/bike trail; and impacts to safety, property values, and vegetative buffers.

**RESPONSE:** A “Trailway Plan and Environmental Assessment” is being prepared to analyze a range of alternatives within Leelanau County for providing a nonmotorized hike/bike trail that is separate from the road surface. That plan, scheduled for release in the near future, is separate from this GMP/WS planning process, and will examine likely impacts of the hike/bike trail in more detail.

It is anticipated that the trail would be located entirely on either federal land within the National Lakeshore, on state highway rights-of-way, or (in a few cases) on county road rights-of-way. The trail would be sited within the state highway right of way in areas where private land abuts the highway corridor.

Planning for the trail in Benzie County has not been initiated. However, the *Draft General Management Plan / Wilderness Study* includes management zoning that would accommodate the hike/bike trail in both Benzie and Leelanau counties.

Placement of the high use zone in the GMP/WS alternatives in no way implies acquisition of private lands for the hike/bike trail. This point has been clarified in “Appendix D: Development of the Preferred Alternative.” The National Park Service does not control state or county road rights-of-way within the National Lakeshore. The National Park Service also recognizes private inholdings and other valid existing rights, and the management zones shown on the alternative maps are not intended to imply otherwise.

**COMMENT:** Consideration of a Lake Michigan boat access in the high use zone near Platte Point should be made more assertively in the preferred alternative.

**RESPONSE:** A decision on whether a new boat ramp should be developed within the high use zone near the mouth of the Platte River is likely to be complicated and controversial. As stated in the preferred alternative, a separate environmental impact statement would be needed to determine whether any such facility would be appropriate in this area. Such a study would consider a number of alternatives (including a no-action alternative) and the environmental, safety, visitor opportunity, and other impacts of implementing those alternatives. The National Park Service will not make a decision on this topic until such a study, conducted with opportunities for public input, is completed.

**COMMENT:** A Lake Michigan boat access in the high use zone near Platte Point would have undesirable environmental impacts.

**RESPONSE:** See the response immediately above.

**COMMENT:** Over-building the parking area at Esch Beach could result in more use and watershed problems.

**RESPONSE:** The preferred alternative places the Esch Beach parking area out of proposed wilderness and in the recreation zone, and proposes improvements at this site. If the scale of the developments eventually proposed have the potential for significant impacts, these would have to be assessed in a planning document with the input of the public. Please also see the comment and response about Esch Beach under the “Natural Resources” topic.

**COMMENT:** National Lakeshore use of sustainable technologies (wind and solar

power, alternative fuels transportation, etc.) should be part of the preferred alternative.

**RESPONSE:** Sustainability of NPS operations and facilities is a National Lakeshore-wide goal. The GMP/WS alternatives do not differ with regard to this goal. This topic is addressed in the chapter 1 “Desired Conditions and Strategies” heading, under the “Facilities and Services” subheading.

**COMMENT:** The National Park Service should collaborate with nearby counties on “The Grand Vision,” a regional traffic and land use study.

**RESPONSE:** The National Park Service has been participating in “The Grand Vision” effort, attending meetings and workshops and providing input.



IN REPLY REFER TO:

## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
East Lansing Field Office (ES)  
2651 Coolidge Road, Suite 101  
East Lansing, Michigan 48823-6316

June 16, 2008

Ms. Dusty Shultz, Superintendent  
National Park Service  
Sleeping Bear Dunes National Lakeshore  
9922 Front Street (Hwy M-72)  
Empire, Michigan 49630

Subject: Request for consultation under section 7 of the Endangered Species Act  
for the General Management Plan for Sleeping Bear Dunes National  
Lakeshore, Leelanau and Benzie Counties, Michigan.

Dear Ms.Shultz:

We have received your April 8, 2008 letter and Draft General Management Plan (GMP)/Wilderness Study/Environmental Impact Statement (EIS) requesting consultation under section 7 of the Endangered Species Act of 1973, as amended, for the Sleeping Bear Dunes National Lakeshore (SBDNL), Leelanau and Benzie Counties, Michigan. According to your letter, the GMP provides an overall decision-making framework for long-term management direction for the next twenty years. Your preferred alternative, described on pages 52 to 55 in the GMP, values the Lakeshore primarily for preservation of natural resources and for opportunities for visitor enjoyment of natural, cultural and recreational resources. It also includes a proposal to designate 32,200 acres as wilderness. The preferred alternative was considered the proposed action for purposes of this consultation.

Your EIS addresses potential effects of the proposed action on the Pitcher's thistle (*Cirsium pitcheri*), Michigan monkey flower (*Mimulus glabratus* var. *Michiganensis*), piping plover (*Charadrius melodus*) and piping plover critical habitat. We concur that these are the only federally listed threatened or endangered species or critical habitat that are currently known to occur within the action area. The potential range of the Indiana bat (*Myotis sodalis*) may extend into portions of Leelanau and Benzie Counties, but there are no known records of this species within the Lakeshore. As a result, you dismissed Indiana bat from further analysis in your EIS.

## COMMENTS

## RESPONSES

Ms. Dusty Schultz

2

Pitcher's thistle, piping plover and piping plover critical habitat occur in association with near-shore dunes and beach areas at various locations within the Lakeshore, including sites on North Manitou Island. Michigan monkey flower, in contrast, is restricted in distribution to one lakeside location within the Lakeshore interior. Your analysis assumes continued protection of threatened and endangered species within the Lakeshore, as outlined in the desired condition statements in the GMP.

For projects proposed under the preferred alternative, the GMP indicates you will implement measures to ensure there will be no adverse effects on listed species. These include:

- Safeguarding the known locations of listed species
- Restricting human activity in piping plover breeding areas by use of specialized fencing
- Increasing the number of NPS/volunteer piping plover nest monitors, should conditions warrant
- Restricting human activity in piping plover breeding areas
- Restricting dogs from piping plover breeding areas during the breeding season
- Flagging or fencing plants prior to any work in or adjacent to Pitcher's thistle habitat
- Providing education about the listed species and their habitat
- Designating alternative access points away from areas occupied by listed species.

Given these measures, you have indicated that NPS cannot foresee at any time, any project proposed in the GMP for which adverse effects could not be avoided. In the event adverse effects cannot be avoided you have indicated that you will discontinue the project or request formal consultation with our office. In addition, you have indicated the preferred alternative includes a 3% increase in areas managed as wilderness. The increase in wilderness area may benefit listed species within the Lakeshore, although you have indicated the benefit may not be significant due to the current management practices already underway at the Lakeshore.

Based on information provided in the EIS, including the measures described above, we concur with your determination that the proposed preferred alternative may affect but not likely adversely affect Pitcher's thistle, Michigan monkey flower, piping plover or piping plover critical habitat. Effects of the proposed alternative are considered insignificant, discountable or beneficial.

This precludes the need for further action on this project as required under section 7 of the Act. If, however, project plans change, elements of the preferred alternative are modified, or new information becomes available that indicates listed or proposed species may be affected by any actions proposed under the preferred alternative, you should reinitiate consultation with this office.

## COMMENTS

## RESPONSES

Ms. Dusty Schultz

3

### Comments on the EIS

We have also reviewed the GMP/Wilderness Study/EIS and offer these comments.

1.

Table 21, Page 172. We suggest you consider adding piping plover critical habitat to the "species potentially affected" column. As we have consulted on restoration activities and the potential effect on piping plover and piping plover critical habitat, we suggest you also add these to the "potential impacts" column. You may wish to consider these additions in Chapter 5: Environmental Consequences.

Cumulative Impacts, Page 206. Clarification and additions may be needed here. Some past projects at the Lakeshore, such as the site restoration project near Glen Lake, have adversely affected federally listed species, i.e. Michigan monkey flower. These resulted in formal consultation with our office. The Cumulative Impacts section suggests past projects have had only beneficial effects.

We appreciate the opportunity to cooperate with the Sleeping Bear Dunes National Lakeshore in conserving endangered species. If further assistance is needed or you have any questions, please contact Jack Dingledine at (517) 351-6320.

Sincerely,



Craig Czarnecki  
Field Supervisor

1. Table 21 was revised as suggested. The "Cumulative Impacts" sections related to federal threatened and endangered species have been revised to reflect past projects that have adversely affected the Michigan monkey flower.



## COMMENTS

## RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

RECEIVED  
BY *SP* DATE 6/2/08

JUN 09 2008

REPLY TO THE ATTENTION OF:

E-19J

Mr. Nick Chevance  
Regional Environmental Coordinator  
National Park Service  
Midwest Region  
601 Riverfront Drive  
Omaha, Nebraska 68102-4226

**Re: Draft Environmental Impact Statement / Draft General Management Plan/Draft  
Wilderness Study for Sleeping Bear Dunes National Lakeshore, Benzie and  
Leelanau Counties, Michigan, CEQ#: 20080134**

Dear Mr. Chevance:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan (GMP), Wilderness Study and Environmental Impact Statement (EIS), issued by the National Park Service, for the project listed above.

Sleeping Bear Dunes National Lakeshore consists of a mainland portion plus North Manitou and South Manitou islands and is in the northwestern portion of Michigan's Lower Peninsula. The park is 71,291 acres total.

Five alternatives are presented in the DEIS. There is a no-action alternative that primarily reflects current conditions and activities at the park. There are four action alternatives (preferred, A, B, and C) representing different ways to manage the site. Four Management Zones have been designated in the Draft GMP. They are as follows: High Use, Experience History, Recreation, and Experience Nature.

The no-action alternative does not contain any Management Zones. The other four alternatives were closely aligned in the Management Zones of High Use and Experience History, except alternative A, which only designated 1% of the park to High Use. The preferred alternative is zoned for 25% Recreation and 67% Experience Nature. Alternative A is zoned for 19% Recreation and 74% Experience Nature. Alternative B is zoned for 56% Recreation and 35% Experience Nature. Alternative C is zoned for 25% Recreation and 66% Experience Nature.

The wilderness study designates the following percentages of wilderness for each action alternative: 46% for the preferred alternative (32,200 acres), 47% for alternative A (33,600 acres), 20% for alternative B (14,400 acres), and 32% for alternative C (23,200 acres). The no-



## COMMENTS

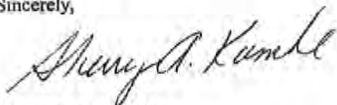
## RESPONSES

action alternative has 43% of the park designated as wilderness (30,903 acres).

U.S. EPA rates the DEIS preferred alternative as **LO (Lack of Objection)**. The preferred alternative represents a large portion of the park being managed as the Experience Nature Management Zone, while still providing many recreational opportunities. We have included a Stormwater Green Sheet for your consideration during planning activities and project design. We also want to inform you that we recently became aware that using certain types of plastic mesh as an erosion barrier may prove fatal to snakes and birds. If these materials are used at Sleeping Bear Dunes National Lakeshore, please consider alternate materials or methods.

If you have any questions please contact Julie Guenther at (312) 886-3172 or email her at [guenther.julia@epa.gov](mailto:guenther.julia@epa.gov).

Sincerely,



Kenneth A. Westlake  
NEPA Implementation  
Office of Enforcement and Compliance Assurance

Enclosures: Summary of Ratings Definition and Followup Action  
Stormwater Green Sheet

Cc: Superintendent Dusty Schultz  
Sleeping Bear Dunes National Lakeshore  
9922 Front St  
Empire, Michigan 49630-9797

**\*SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\*****Environmental Impact of the Action****LO-Lack of Objections**

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC-Environmental Concerns**

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

**EO-Environmental Objections**

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU-Environmentally Unsatisfactory**

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

**Adequacy of the Impact Statement****Category 1-Adequate**

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2-Insufficient Information**

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

**Category 3-Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions impacting the Environment

## NEPA Stormwater Green Sheet

**Stormwater section of NEPA documents should discuss/include (at a minimum):**

- ✓ Compliance with NPDES construction and post-construction requirements (project larger than one acre has to comply by writing a pollution prevention plan)
- ✓ Compliance with local ordinances
- ✓ Compliance with the Energy Independence and Security Act of 2007

"Energy Independence and Security Act of 2007" Title IV ("Energy Savings in Building and Industry"), Subtitle C "(High Performance Federal Buildings)". Here is the entire provision:

SEC. 438. STORM WATER RUNOFF REQUIREMENTS FOR FEDERAL DEVELOPMENT PROJECTS.

The sponsor of any development or redevelopment project involving a Federal facility with a footprint that exceeds 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow.

This provision is quite significant. It will require Federal sites to achieve/maintain the predevelopment hydrology to the "maximum extent technically feasible". Sites will need to include things like rain gardens and permeable pavements in order to do this.

**Stormwater measures beyond the bare minimum:**

- ✓ Mimic natural hydrology. Does the project decrease the recharge of the upper aquifer system?
- ✓ Sensitive areas should be given treatment beyond the bare minimum
- ✓ Keep native vegetation during construction and replant ASAP
- ✓ What types of salt/chemicals are being used for deicing? Latest BMP's used for deicing?  
[http://www.upperdesplainsriver.org/bbb\\_roadsalt.htm](http://www.upperdesplainsriver.org/bbb_roadsalt.htm)
- ✓ Sprawl is bad! Smart growth is good! Are there ways that the development can be implemented in a more compact area? [www.epa.gov/ehp/pages/pollsmartgrowth.html](http://www.epa.gov/ehp/pages/pollsmartgrowth.html) -select "pollution prevention programs" and "sustainability" for more info.
- ✓ Rain gardens, and permeable parking surfaces. Rain gardens and permeable parking surfaces increase the amount of water filtering into the ground and recharge aquifers, prevent community flooding and drainage problems, help protect waterbodies from pollutants carried by urban stormwater, and provide valuable wildlife habitat in an urban setting.
- ✓ Commitment to creating a Sustainable Buildings Implementation Plan (per Executive Order 13423) prior to construction.
- ✓ Green roofs, created wetlands, vegetated swales, native plant landscapes, and rain barrels
- ✓ Websites that can help with Stormwater Pollution Prevention and Sustainable Design:
  - Menu of stormwater BMP's: <http://cfpub1.epa.gov/npdes/stormwater/menuofbmps/>
  - Medium and small-sized model stormwater pollution prevention guides for construction sites: [www.epa.gov/npdes/swpppguide](http://www.epa.gov/npdes/swpppguide)
  - Green infrastructure practices (e.g. rain gardens): <http://www.epa.gov/npdes/greeninfrastructure/>
  - Some standards, including standards for individual sites: <http://www.sustainablesites.org/>
  - Standards for neighborhoods (LEED for Neighborhood Development): <http://www.usgbc.org/DisplayPage.aspx?CMSPageID=148>
  - Center for Watershed Protection: [www.cwp.org](http://www.cwp.org)
  - Low impact Development Center: [www.lowimpactdevelopment.org](http://www.lowimpactdevelopment.org)
  - Green Alley Handbook: <http://egov.cityofchicago.org/city/webportal/home.do> -at top of page City Departments, choose Transportation, under CDOT Programs choose Green Alleys, choose Green Alleys again and scroll down for the Green Alley Handbook
  - Menu of Stormwater Best Management Practices (compost-based fact sheets, etc.): <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>

## COMMENTS

## RESPONSES



### The Grand Traverse Band of Ottawa and Chippewa Indians

2605 N. West Bay Shore Drive • Peshawbestown, MI 49682 • (231) 534-7750

June 18, 2008

Received by

JUN 24 2008

SLBE Mailroom

Ms. Dusty Shultz, Superintendent  
Sleeping Bear Dunes National Lakeshore  
9922 Front Street  
Empire, MI 49630-9417

Re: Sleeping Bear Dunes National Lakeshore Draft Management Plan/Wilderness  
Study/Environmental Impact Statement April 2008 Comments

Dear Ms. Shultz,

The Grand Traverse Band of Ottawa and Chippewa Indians (GTB) are the cultural and political descendants of the Ottawa and Chippewa Bands who have resided in the upper Great Lakes Region for countless generations are, to a great extent, pleased with the effort SLBE has made regarding the Park Management Plan, Wilderness Study, and Environmental Impact Study required by the National Environmental Policy Act of 1969(NEPA). We understand that consultation with Tribal governments is not only an obligation of Federal Trust Responsibility and a requirement of NEPA; it is a process in which GTB is familiar with, and successfully engages with the implementation of the management plans and practices required by other Federal agencies in Northern Michigan.

After significant review and deliberation among staff of our Natural Resources Department (NRD) we would like to offer the following comments and would hope that you consider incorporating slight adjustments to your Preferred Alternative as we suggest:

#### Management Zone Comments:

In general we support the configuration and extend of your various management zone designations, where there appears to be a balance of natural resource and recreational opportunities.

- **High Use Zone (HUZ)** – It is the fundamental view of GTB NRD that “high use” zones should be limited in scope and extent and include only the main thoroughfares through the Park (M-22 and M-109); Peirce Stocking Drive; the Dune Climb and Empire Bluffs parking areas; and the Platte River Ranger Station, campground and associated access road to Platte River Point. Additionally, after consultation with NRD staff and members of the Tribe’s Natural Resources and Environment Committee, it was agreed that small boat access to Lake Michigan is important. We would suggest that the road ends at County Road 669 and Esch Road be modified and maintained to allow

1. These road ends are maintained by the county road commissions, and currently accommodate launching of small watercraft.



Ms. Dusty Shultz, Superintendent  
June 18, 2008  
Page 2 of 4

1. <sup>↑</sup>launching of small trailerable fishing watercraft if possible. <sup>↑</sup> Though our philosophy remains that promoting high use within certain areas of the National Lakeshore is undesirable, we feel that if planned and implemented carefully the addition of such access, high use could be minimized while offering access for both tribal and non-tribal subsistence fishers. Given the aforementioned recommended change, the Preferred Alternative reflects our desired future condition in terms of HUZ's.
- **Experience History Zone (EHZ)** – Though the Historic Properties are not of particular interest to the Grand Traverse Band primarily stemming from the fact that homesteading of properties ultimately led to the reduction, modification and/or elimination of lands traditionally used for tribal cultural, traditional and subsistence purposes. To the Tribe this is relatively recent history. However given that, the Grand Traverse Band respects the registration of Historic places
2. and does not object to their preservation, however we would offer that the concept of preserving landscapes “as they would have been while in operation” be carried further to included that such landscapes could possibly benefit not only the visiting public as well as local wildlife and the environment. Working farms producing crops such as alfalfa, rye, clover, summer or winter rape and other grass or oil-seed bearing species would not only give the appearance of a working farm, but also provide forage for many native wildlife species and potentially provide a source of biofuels. We would be interested in discussing this further once the GMP is under implementation.
3. Additionally, we understand the premise of the Purpose and Significance Statements as reflecting the enabling legislation of the Park and that the EHZ carries that concept forward, however we would offer the following: We continue to feel strongly that some reference should be made to the preservation and/or potential restoration of tribal cultural resources within the Park including, but not limiting to, components such as Native American burial and ceremonial sites; natural resources utilized by Native Americans; and reference to the Department of Interior's Trust Responsibility to Indian Tribes. Given the aforementioned recommended considerations, the Preferred Alternative reflects our desired future condition in terms of EHZ's.
- **Recreation Zone (RZ) and Experience Nature Zone (ENZ)** – Our views on these elements remain consistent with our letter sent on May 4, 2007. It
4. appears to us that there are really only very subtle differences between the “recreation” and “experience nature” zones. The only substantive difference appears to be the occurrence of Wilderness. Generally it appears that the recreation zone would offer accommodation to slightly higher visitation levels, but it is not clear to what degree this refers. Realistically, the opportunity for solitude are likely indiscernible between the RZ and ENZ. It is unclear what is
5. meant by the reference to “developments” under Facilities and Commercial Services. Clarification would be helpful. Fundamentally, the tribe supports

2. The experience history and recreation zones would allow for agricultural crops to be considered in accordance with historic preservation principles, and after an analysis of potential impacts. Such crops may incidentally benefit wildlife and the natural environment.

3. These concerns are addressed in chapter 1, under the “Desired Conditions and Strategies” heading, “Relations with American Indian Tribes” subheading, and in chapter 4 under the “Impact Topics Considered but Not Analyzed in Detail” heading, “Indian Trust Resources” subheading. A strategy related to American Indians has been added to the chapter 1 “Natural Resources (General) and Diversity” subheading of the “Desired Conditions and Strategies” heading.

4. Although some differences between the recreation zone and experience nature zone may seem subtle, many are not. For example, the recreation zone permits motorized use, while the experience nature zone does not. Also, the recreation zone permits major operational facilities such as roads, parking areas, docks and boat launches, and formal picnic areas, while the experience nature zone permits only very modest improvements such as trails or signs. These distinctions are true regardless of wilderness status. Table 1 in chapter 2 provides a side-by-side comparison of the four management zones.

5. In Table 1: Management Zones (chapter 2), “developments” refers to infrastructure intentionally developed by humans. As such, NPS development ranges from primitive maintained trails, to roads and (continued on next page)

## COMMENTS

## RESPONSES

Ms. Dusty Shultz, Superintendent  
June 18, 2008  
Page 3 of 4

5. the ENZ philosophy in that the resources within them should be enjoyed and protected from development, but we would offer that resource "enhancement" be added as allowable under the ENZ and include "resource improvement" in addition to *reduce resource impacts* as it relates to resource modification. Given the aforementioned recommended considerations, the Preferred Alternative reflects our desired future condition in terms of Recreation and Experience Nature Zones.

6. **Wilderness** – We remain unclear as to the costs and benefits related to designating areas as Wilderness. We also continue to struggle with the concept of wilderness in region largely defined by recreational values mixed with strong local and regional desires to maintain access to such areas. We understand that access via County owned roads would remain the same as they are not classified as wilderness, but it remains unclear whether these roads would remain open and classified under a Recreation Zone if any were relinquished by the County to the Park in the future. Particularly given the fact that the Wilderness designation as defined in the 1981 recommendation would remain in effect "until Congress acts on a new recommendation" effectively leaving some important road right-of-ways in Wilderness given relinquishment from the owning Counties, clarification would be helpful.

We understand that a wide variety of recreational uses and management actions are allowed within Wilderness, and we support this provided it includes resource enhancement/improvement in addition to restoration. Often enhancement or improvement of resources is necessary for restoring native communities of flora and fauna. In some cases, restoration may mean returning an already existing population of individuals to its historic or natural levels. In short we feel it is important to consider the possibility of improving natural resources within SLBE rather than getting caught up in semantics. We would like to discuss this further and come to a mutual understanding of this issue.

7. Finally, we continue to seek clarification as to whether some of the prohibitions within Wilderness areas may conflict with certain tribal ceremonies and rituals (eg sweatlodges). We would invite further discussions related to this issue: Given the aforementioned recommendation the Preferred Alternative reflects our desired future condition in terms of Wilderness.

### Grand Traverse Band Preferred Alternative:

Fundamentally, the Grand Traverse Band would support the Sleeping Bear Dunes National Lakeshore Preferred Alternative as it appears to provide a good mix of enjoyment opportunities to the public as well as resource protection. Based on the description of the ENZ and Uses and Management in Wilderness it is evident that management actions may be taken to preserve and potentially "enhance" resources and we would support this vision. Yet, as mentioned above we would prefer to

5. (continued) parking lots, to boat ramps or docks, to administrative offices and museums. Protecting and preserving natural resources is the top priority in the experience nature zone. Natural resources would be modified only to provide for safe visitor access or to reduce resource impacts, such as from exotic species or past developments. These sorts of "resource improvements" are allowed in all of the zones to the extent described in the "Desired Future Conditions and Strategies" heading in chapter 1 and the management zone table in chapter 2. The terms "resource enhancement" and "resource improvement" can have many meanings. NPS staff will work closely with affiliated tribes to evaluate any specific proposals.

6. Costs for each of the alternatives are included in each alternative description (chapter 2) and in appendix C. Environmental impacts have been evaluated in chapter 5. The areas proposed as wilderness are intended to provide a specific type of recreational value, and the existing roads provide access to those areas. The preferred alternative includes a new wilderness proposal in which county roads would remain out of wilderness, in the recreation zone, even if they were abandoned by the county(ies) within the life span of this plan. The recreation zone specifically allows for their continued use for vehicle travel. However, if a new wilderness proposal is not advanced, and acted upon by Congress as a result of this process, any abandonment of the rights-of-way for the county roads in the 1981 "Wilderness Recommendation" would indeed result in their closure. The counties have given no indication that they plan to abandon these rights-of-way.

7. Tribal ceremonies and rituals, (e.g., sweatlodges) are not precluded in wilderness. NPS staff will continue to work closely with affiliated tribes to address these and other issues.

## COMMENTS

## RESPONSES

Ms. Dusty Shultz, Superintendent  
June 18, 2008  
Page 4 of 4

discuss and clarify this issue further in addition to discussing the costs and benefits of wilderness designations in general.

In summary, we support the Preferred Alternative with the following changes and considerations:

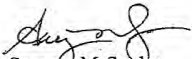
- ☐ Add and maintain small fishing boat access at County Road ends 669 and Esch Road.
- ☐ Consider developing wildlife plantings around farms under Historic Preservation.
- ☐ Add "enhancement" and "resource improvement" to the definition of ENZ.
- ☐ Ensure improved roads remain open regardless of whether ownership is retained by the Counties.

In closing, we appreciate the opportunity for involvement in the revision process of the General Management Plan and look forward to further participation in the upcoming process components as well as the overall management of natural resources within the National Lakeshore. I would encourage a meeting with my staff to discuss your next steps in selecting the Preferred Alternative in defining the future vision of the Sleeping Bear Dunes National Lakeshore, and also encourage future discussions of issues identified above in regards to future management actions related to GMP implementation. Please contact Suzanne McSawby at 231-534-7104 with any questions and to identify the timing of a consultation meeting.

Sincerely,



Robert Kewaygoshkum  
Tribal Chairman



Suzanne McSawby  
Natural Resources Department Manager



## COMMENTS

## RESPONSES



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



STEVEN E. CHESTER  
DIRECTOR

June 23, 2008

Received by

JUN 26 2008

SLBE Mailroom

Ms. Dusty Shultz, Superintendent  
Sleeping Bear Dunes National Lakeshore  
9922 Front Street  
Empire, Michigan 49630-9797

Dear Ms. Shultz:

On behalf of the Coastal Management Program in the Department of Environmental Quality (DEQ), I am pleased to provide comments on the Draft General Management Plan, Wilderness Study, and Environmental Impact Statement.

It appears that all of the proposed Alternatives, other than the No-Action Alternative, would bring additional resources and significantly increase federal investments in the Lakeshore for improvements. However, we strongly support the Preferred Alternative identified in the Draft Management Plan. The Preferred Alternative strikes a good balance between protecting sensitive coastal resources and providing ample opportunity for visitor access and recreation. Activities such as controlling invasive species, protecting open dune areas, restoring disturbed sites, and protecting threatened and endangered species are all consistent with the goals of the Coastal Management Program and the DEQ.

We also support the emphasis placed on protecting cultural and historic resources within the context of the management zone in which they are located. We are pleased to see that the Preferred Alternative would preserve, rehabilitate, and restore important historic structures at some of the more popular destinations such as Glen Haven, Port Oneida, and North and South Manitou Islands.

1. There are activities identified in the Preferred Alternative that will require state permits under the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. [The National Park Service (NPS) has a long history of stewardship of coastal resources and cooperation with the state of Michigan on development proposals. The staff of the DEQ looks forward to working with you on implementing improvements at the Park.

The Coastal Management Program also greatly appreciates the strong emphasis that the NPS placed on encouraging public input on the planning process. The consultation process was extensive and it is apparent the Park Service was open and responsive to comments that were submitted.

1. The National Park Service will continue to work closely with the state of Michigan during implementation of the preferred alternative. This includes obtaining required state permits once development proposals are in the design phase.



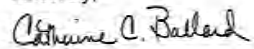
## COMMENTS

## RESPONSES

Ms. Dusty Shultz  
Page Two  
June 23, 2008

The Coastal Management Program greatly appreciates the significant commitment of federal resources the NPS brings to Michigan's shoreline. We view the Sleeping Bear Dunes National Lakeshore as one of the most significant coastal resources in the state, and we look forward to working with you as you implement the selected alternative.

Sincerely,



Catherine Cunningham Ballard, Chief  
Michigan Coastal Management Program  
Environmental Science and Services Division  
(517) 335-3456

cc: Mr. Michael Duwe, NPS  
Mr. Frank Ruswick, DEQ  
Mr. Ken DeBeaussaert, DEQ  
Ms. Liz Brown, DEQ  
Ms. Amy Butler, DEQ  
Mr. Christopher Antieau, DEQ

# COMMENTS

# RESPONSES



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR. WILLIAM ANDERSON  
DIRECTOR

June 30, 2008

DUSTY SCHULTZ  
NATIONAL PARK SERVICE  
SLEEPING BEAR DUNES NATIONAL LAKESHORE  
9922 FRONT STREET HWY M-72  
EMPIRE MI 49630-9797

Received by

JUL 07 2008

SLBE Mailroom

RE: ER96-12 Sleeping Bear Dunes National Lakeshore Draft General Management  
Plan/Wilderness Study/EIS, Leelanau County (NPS)

Dear Ms. Schultz:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the above-cited Draft General Management Plan/Wilderness Study/EIS (GMP) for Sleeping Bear Dunes National Lakeshore. Based on the information provided for our review, it is the opinion of the State Historic Preservation Officer (SHPO) that the preferred alternative identified in the GMP does not meet the criteria of adverse effect [36 CFR § 800.5(a)(1)] and will have no adverse effect [36 CFR § 800.5(b)] on historic properties within the area of potential effects for the above-cited undertaking.

The views of the public are essential to informed decision making in the Section 106 process. Federal Agency Officials or their delegated authorities must plan to involve the public in a manner that reflects the nature and complexity of the undertaking, its effects on historic properties and other provisions per 36 CFR § 800.2(d). We remind you that Federal Agency Officials or their delegated authorities are required to consult with the appropriate Indian tribe and/or Tribal Historic Preservation Officer (THPO) when the undertaking may occur on or affect any historic properties on tribal lands. In all cases, whether the project occurs on tribal lands or not, Federal Agency Officials or their delegated authorities are also required to make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties per 36 CFR § 800.2(c).

This letter evidences the NPS's compliance with 36 CFR § 800.4 "Identification of historic properties" and 36 CFR § 800.5 "Assessment of adverse effects", and the fulfillment of the NPS's responsibility to notify the SHPO, as a consulting party in the Section 106 process, under 36 CFR § 800.5(c) "Consulting party review".

The State Historic Preservation Office is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Martha MacFarlane Fae, Environmental Review Coordinator, at (517) 335-2721 or by email at ER@michigan.gov. Please reference our project number in all communication with this office regarding this undertaking. Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

Brian D. Conway  
State Historic Preservation Officer

BDC:DLA:ROC:REM:hgg

STATE HISTORIC PRESERVATION OFFICE, MICHIGAN HISTORICAL CENTER  
702 WEST KALAMAZOO STREET • P.O. BOX 30740 • LANSING, MICHIGAN 48909-8240  
(517) 373-1630  
www.michigan.gov/hp

## COMMENTS

## RESPONSES



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES

LANSING



REBECCA A. HUMPHRIES  
DIRECTOR

June 11, 2008

Ms. Dusty Shultz, Superintendent  
U. S. Department of the Interior  
National Park Service  
Sleeping Bear Dunes National Lakeshore  
9922 Front Street (Hwy. M-72)  
Empire, MI 49630-9797

Received by

JUL 15 2008

GLBE Mailroom

SUBJECT: Comments on the Sleeping Bear Dunes National Lakeshore General  
Management Plan/Wilderness Study/Environmental Impact Statement  
for a National Lakeshore

Dear Ms. Shultz:

The Michigan Department of Natural Resources (DNR) is pleased to have the opportunity to review these plans and comment on them. Your presentation on May 22, 2008 helped to bring into focus the multitude of considerations covered in your planning process and your general management plan, and I thank you for providing us with that opportunity.

All of the DNR resource divisions have reviewed the plan and their comments have been consolidated into the attached Summary. This Summary shows that the DNR supports the recommended "Preferred Alternative" as outlined in your plan.

If you have any questions regarding the attached summary, please contact Mr. Paul Curtis, the DNR Parks and Recreation Division's Park Management Plan Administrator, who coordinated the review of this document and summarized the DNR's comments. Mr. Curtis can be reached at 517-335-4832 or [curtisp@michigan.gov](mailto:curtisp@michigan.gov) via e-mail.

Thanks again for the opportunity to meet with you and comment on this plan.

Sincerely,

Mindy Koch  
Resource Management Deputy  
517-373-0046

cc: Director Rebecca A. Humphries, DNR  
Mr. Ronald A. Olson, DNR  
Mr. Douglas Reeves, DNR  
Mr. Kelley Smith, DNR  
Ms. Lynne Boyd, DNR  
Mr. Paul Curtis, DNR

NATURAL RESOURCES COMMISSION

Keith J. Charters, Chair • Mary Brown • Hurley J. Coleman, Jr. • Darrell Earley • John Madigan • J. R. Richardson • Frank Wheatlake

STEVENS T. MASON BUILDING • P.O. BOX 30028 • LANSING, MICHIGAN 48909-7528  
[www.michigan.gov/dnr](http://www.michigan.gov/dnr) • (517) 373-2329

Great Lakes, Great Times, Great Outdoors!

## COMMENTS

## RESPONSES

6.10.2008

### **Sleeping Bear Dunes National Lakeshore**

Department of Natural Resources (DNR) Summary on the Draft General Management Plan (GMP), Wilderness Study and Environmental Impact Statement

#### Comments were provided by the DNR's:

- Parks and Recreation Division (PRD)
- Forest, Mineral, and Fire Management Division (FMFMD)
- Fisheries Division (FD)
- Wildlife Division (WD)
- Law Enforcement Division (LED)
- Northern Lower Peninsula Ecoregion Team (NLP)

#### Coordinated response prepared by:

- Paul N. Curtis, PRD Park Management Plan Administrator

#### Recommendation:

The Michigan Department of Natural Resources (DNR) supports the "Preferred Alternative" proposed by the National Park Service (NPS) for the Sleeping Bear Dunes National Lakeshore. The General Management Plan and Wilderness Study were reviewed by all resource divisions of the DNR, as well as the DNR's Northern Lower Peninsula Ecoregion Team.

Following are general comments on the overall plan and process, as well as comments specific to each main section of the General Management Plan.

#### General Comments:

Our overall impression is that this plan represents a very thorough development of an assessment of natural/cultural resources and opportunities for recreation and education. We appreciate that State listed endangered and threatened species, and special concern species, were addressed in the plan, as were cultural resources of significance at the local level.

We support the work of the NPS and their planning partners in the development of the "Preferred Alternative," and we endorse that recommendation. The preferred plan is the result of a planning process that demonstrated an impressive effort to engage the public and stakeholders. The document is well organized and succinct in its recommendations. The creation of the four zones is both creative and informative to any casual visitor and should serve the NPS well in its future management of the Sleeping Bear Dunes National Lakeshore.



## COMMENTS

## RESPONSES

The DNR manages properties and programs in close proximity to the Sleeping Bear Dunes National Lakeshore, and there has been a history of cooperation between the two agencies on regional land management issues, including, but not limited to:

- Management of deer populations on both the mainland and the offshore islands of South and North Manitou.
- Operation of the weir on the Platte River, which is on DNR property within the national lakeshore boundary.
- Cooperative work on threatened and endangered species, such as the piping plover.
- Cooperation with training and law enforcement issues.

The DNR looks forward to continued cooperative management opportunities, specifically as relates to these and to forest health, regional recreation and wildfire management and assistance.

1. Under the text of 'Ecosystem Management' (pg. 16) the plan does advocate regional cooperation with surrounding landowners on regional land management issues, but we feel that it should be strengthened to include in the listed strategies the following:

- Manage for forest health to include not only invasive species but also insects and diseases. Forest pests and diseases such as emerald ash borer, beech bark disease, oak wilt and others have the potential to regionally impact forests.

2. Acknowledge that impacts of proposed recreation changes (e.g. elimination of motorboat use on Bass Lake, a new trail, or removal of a campground) may have an impact on other regional providers of recreation, and discuss what those impacts might be.

3. More specific language regarding the benefits of interagency cooperation on fire management and assistance (e.g. for prevention, mitigation of threat, readiness, detection, suppression of wildfires (if needed), and use of fire to meet management objectives in and adjacent to their areas of responsibility)

### General Management Plan

#### Summary:

- The explanation of why you did all three documents at once is good ('Purpose' statements). Not only because of the similar processes involved, but more importantly because it makes sense for the GMP to guide the recommendation for designation of the Wilderness area.
- This will be the only part this document that some people read. Inclusion of maps/graphics (a location map and maps of the GMP alternatives incorporated into the text of the "Summary") would help convey the message more effectively. (Maps of these were provided in a pocket in

1. In chapter 1, under the "Desired Conditions and Strategies" heading the strategy regarding control of invasive nonnative species ("Ecosystem Management" subheading) and the strategy about fire management ("Natural Resources [General] and Diversity" subheading) have been revised.

2. Chapter 5 (Environmental Consequences) sections on regional socio-economics have been revised to address these impacts as suggested.

3. In chapter 1, under the "Desired Conditions and Strategies" heading the strategy regarding control of invasive nonnative species ("Ecosystem Management" subheading) and the strategy about fire management ("Natural Resources [General] and Diversity" subheading) have been revised.

the back of the document, but no reference was made to them or their location in the text.)

- Grammar question...the management zones are identified as "high use zone" (for example). As a specific title, shouldn't it be capitalized? (this occurs throughout document)
- Reference is made in the discussion of the Preferred Alternative for selected areas to be zoned 'high use' or 'recreation' to allow for possible future recreation opportunities...we could not find where these might be in this section or in the full discussion starting on page 52. If it merits mention, it seems it should merit some discussion of where and why.
- 'Next Steps' is good information on what to expect.
- Overall content well thought-out and understandable. (The style used for naming/page numbering in the "Contents," however, is distracting and hard to read.)

#### Chapter 1 – Introduction:

- Good overviews of both the park and the planning process
- 'Purpose and Needs' statements do a good job of outlining the GMP and Wilderness Study
- Like the focus given for 'Primary Interpretive Themes' (pg.12) and the reference to the 1836 Treaty (pg.14)

#### Chapter 2 – Alternatives:

4. 

- Evaluation of the 'No-Action Alternative' and comparison of it to the others would be easier if the proposed management zones were applied to it. That would give readers of the plans a way to see how the park in currently managed in the context of zones.

  - "Implementation Funding" is a great way to start this chapter with the statement that "...this plan does not guarantee future NPS funding." It is good to have that stated clearly and perhaps often.
  - "Management Zones" brief definitions are good.
  - We'll be interested in how the park implements the monitoring of criteria and indicators of "user capacity" impacts as described in the "User Capacity (Carrying Capacity)" Section.
  - Discussion of alternatives...No-Action, Preferred, and 'A,' 'B' and 'C'...wide range of proposed plan impacts.
5. 

- 'Lake Michigan Boat Access' (pg.54) discusses ramps/docks at the Platte River mouth. This was the source of a DNR effort in the mid-1970's to respond to the new and exploding salmon fishery in Lake Michigan and particularly Platte Bay. A proposal to develop a safe harbor at the river mouth was rejected with much public input against any proposed changes to one of the few remaining "natural" river mouths.

4. The management zones described in chapter 2 were developed through this planning effort and are prescriptive rather than descriptive. In other words, they do not necessarily reflect existing management. Thus, it would be inaccurate and misleading to apply these zones to the map of the no-action alternative.

5. This element of the preferred alternative, like most, is dependent upon funding. The National Park Service will work closely with the Michigan Department of Natural Resources to seek funding for such a study. Cessation of dredging would likely be a component of one or more of the alternatives in this separate study.

## COMMENTS

## RESPONSES

5.  
(continued)

Additionally, we feel that the language regarding Lake Michigan Boat Access should be strengthened regarding the discussion of a 'separate study.' There is no timeline offered for the study. We think that a needed addition to the plan is that it should specify that an Environmental Impact Study be conducted within the lifetime of the General Management Plan. The study should look at alternatives for boat access as well as the current impacts of on-going dredging to accommodate existing use.

6. - 'Inland Lake Use and Access' (pg. 54) recommends removal of motorized boats on Bass Lake and North Bar Lake. These lakes are low in fish productivity and a non-motorized experience is appropriate here, as well as at other inland lakes as proposed. Effecting this change may shift current use to other lakes in the area, including those managed by the DNR or local units.

- Did not see any mention of equestrian use in any of the discussions of recreation activities or trails, though it currently is an activity at Alligator Hill?
- Alternates 'A' and 'B' omit cultural resource opportunities in the middle of South Manitou Island (determined eligible for National Register)

### Chapter 3 – Wilderness Study:

- No comment

### Chapter 4 – Affected Environment:

7.

- Economic Contributions of Sleeping Bear Dunes National Lakeshore (pg.145) ... how were these determined? It would be good to cite the source of this.

### Chapter 5 – Environmental Consequences:

- No comment

### Chapter 6 – Consultation and Coordination:

- Extensive effort demonstrated to interact with the public throughout the planning process.

6. Chapter 5 (Environmental Consequences) sections on regional socioeconomics have been revised to address these impacts as suggested.

7. The information source has been added to the referenced section as suggested.

## COMMENTS

## RESPONSES

**PEPC**  
Planning, Environment and Public Comment

Home Parks Projects/ Search Reports Tools Admin Logout

National Park Service  
U.S. Department of the Interior

SLBE > General Management Plan/Wilderness Study (14651) > Public Documents > Sleeping Bear Dunes National Lakeshore, Draft General Management Plan/Wilderness Study/Environmental Impact Statement - April 2008 > Correspondence

Correspondence (95)

### Author Information

**Keep Private:** No  
**Name:** carolyn damstra  
**Organization:** Michigan Council for Arts and Cultural Affairs  
**Organization Type:** S - State Government  
**Address:** PO Box 30705  
Lansing, MI 48909-8206  
USA

E-mail:

### Correspondence Information

**Status:** Reviewed **Park Correspondence Log:**  
**Date Sent:** 06/11/2008 **Date Received:** 06/11/2008  
**Number of Signatures:** 1 **Form Letter:** No  
**Contains Request(s):** No **Type:** Web Form  
**Notes:**

### Correspondence Text

1. We must insure that preservation of cultural resources is included in the purpose of the Lakeshore statement as Congress intended for every unit of the National Park System. This park's unique cultural resource are a gem of the state and the nation, replicated nowhere else. These resources contribute to the quality and diversity of park offerings and contribute to the economic health of the area. They are as important as the dunes, the water and wildlife for drawing visitors to the area.  
As a program manager for the state's art agency, I help fund cultural projects across the state. Preserving cultural resources are an investment in the future of Michigan, they are why many of the state's residents choose to live here and why visitors come. Human history is natural history, and to ignore this aspect of the lakeshore is to neglect a fundamental part of why this park was chosen to be part of the NPS.  
Carolyn Damstra

Status	Assigned Code(s)	Code
Coded	FO1010	Code

1. A park unit's purpose statement, simply stated, is the reason a specific park was designated by Congress. The purpose of Sleeping Bear Dunes National Lakeshore was clearly specified by Congress in the 1970 legislation that established the National Lakeshore; that purpose does not include cultural resources.

A park unit's purpose statement does not replace or lessen the impact of the National Park Service's mission. Rather, it focuses the agency's management role at a particular park unit. A park's purpose statement also does not permit the National Park Service to ignore the requirements of federal legislation, such as the NPS Organic Act, National Historic Preservation Act, the Archeological Resources Protection Act, or the Native American Graves Protection and Repatriation Act. The National Lakeshore's cultural resources are protected by these laws, and by the *General Management Plan's* specifically stated intent to preserve them.