

# **GREAT LAKES INVASIVE PLANT MANAGEMENT PLAN / ENVIRONMENTAL ASSESSMENT PUBLIC SCOPING COMMENT SUMMARY**

## **1.0 INTRODUCTION**

The National Park Service (NPS) has begun the process of developing a plan that identifies long-term invasive plant management tools that would reduce the impacts of (or threats from) invasive plants to natural and cultural resources and provide opportunities for restoring native plant communities and cultural landscapes. To do so, the NPS will prepare a Great Lakes Invasive Plant Management Plan (IPMP) and an associated Environmental Assessment (EA) for the following ten parks located in the Great Lakes region: Apostle Islands National Lakeshore (APIS), Grand Portage National Monument (GRPO), Ice Age National Scenic Trail (IATR), Indiana Dunes National Lakeshore (INDU), Isle Royale National Park (ISRO), Mississippi National River and Recreation Area (MISS), Pictured Rocks National Lakeshore (PIRO), Sleeping Bear Dunes National Lakeshore (SLBE), St. Croix National Scenic Riverway (SACN), and Voyageurs National Park (VOYA). The purpose of the IPMP/EA will be to provide strategies for park staff to manage terrestrial and emergent wetland invasive plants on both NPS and NPS managed lands within the designated boundaries of the ten Great Lakes parks.

## **2.0 PUBLIC SCOPING OPPORTUNITIES**

### **2.1 Pre-Scoping Courtesy Letter**

A pre-scoping courtesy letter was provided to the ten Great Lakes parks on March 3, 2011 to disseminate to working partners and interested parties of each park. The recipients of the pre-scoping courtesy letter were at the discretion of each park. The template pre-scoping courtesy letter is included in **Attachment A**.

### **2.2 Press Release**

On March 10, 2011, a template press release was provided to the ten Great Lakes parks for release to the public March 21, 2011 through March 28, 2011. The recipients of the press release were also at the discretion of each park. The template press release is included in **Attachment B**.

### **2.3 Scoping Brochure**

On March 17, 2011, a scoping brochure was provided to the ten Great Lakes parks for distribution by each park to Federal, State, and local agencies, elected officials, groups, and interested individuals. The scoping brochure provided information on the NPS purpose and need for the IPMP and asked for comments on the scope of issues to be addressed in the IPMP/EA (see **Attachment C**). The distribution of the scoping brochure was also at the discretion of each park, which could have included park websites, email distribution lists, and mailing lists. The scoping brochure was also posted on NPS' Planning, Environment and Public Comment (PEPC) website at: <http://parkplanning.nps.gov/ipmpea> on March 28, 2011. Members of the public were afforded two different methods for providing comments: electronically through the PEPC website or by mail at Great Lakes IPMP, c/o Kleinfelder, 300 E. Mineral Ave., Suite 7, Littleton, CO 80122-2655.

## 2.4 Supplementary Media Exposure

Project information was also provided to the public through other media outlets such as news articles, radio interviews, and websites prior to and during the public scoping period. **Table 1** identifies the IPMP/EA news articles, radio interviews, and websites that provided project related information to the public.

**Table 1. Supplementary Media Exposure Sources and Dates**

Media Type	Media Source	Date
Radio Station	FM 91.3 KUWS	April 3, 2011
Website	RV Daily Report	April 4, 2011
Website	Stop Aquatic Hitchhikers: Protect Your Waters	April 5, 2011
Radio Station	WQXO Great Lakes Radio	March 21, 2011
Newsletter	St. Croix River Association	March 21, 2011
Newspaper	Glen Arbor Sun	March 22, 2011
Newspaper	Ashland Current	March 28, 2011
Radio Station	WTIP North Shore Community Radio	March 30, 2011

## 3.0 COMMENTS

The official public scoping period was from March 28, 2011 until May 2, 2011. Four comments were received through the PEPC website, and one typed letter was received through the contractor's mailing address, for a total of five scoping comments (See **Attachments D – H**). The topics addressed by the public in these comments have been organized into four major subject areas that broadly describe the nature of the contents:

- Need - landscape scale conservation efforts (**Attachment D, F, and G**)
- Potential Impacts - concern for treatment types (**Attachment E**)
- Existing conditions (**Attachment F**)
- Other (**Attachment H**)

These scoping comments will help set the stage for topics that the IPMP/EA will address. Public input will continue to be invaluable in developing a plan that will make a lasting difference in the long-term invasive plant management of the ten Great Lakes parks. The NPS thanks all who commented and looks forward to your comments on the Draft IPMP/EA, which is expected to be available for review in the spring of 2012.

**RE: Courtesy Letter Regarding NPS Preparation of the Great Lakes IPMP/EA**

Dear Valued Stakeholder:

The National Park Service (NPS) is planning to prepare an Environmental Assessment (EA) for a Great Lakes Invasive Plant Management Plan (IPMP) for the following ten parks located in the Great Lakes region: Apostle Islands National Lakeshore (APIS), Grand Portage National Monument (GRPO), Ice Age National Scenic Trail (IATR), Indiana Dunes National Lakeshore (INDU), Isle Royale National Park (ISRO), Mississippi National River and Recreation Area (MISS), Pictured Rocks National Lakeshore (PIRO), Sleeping Bear Dunes National Lakeshore (SLBE), St. Croix National Scenic River (SACN), and Voyageurs National Park (VOYA).

Based on the purpose and need for the project, the scope of the Great Lakes IPMP EA is to develop a plan that identifies long-term invasive plant management tools that would reduce the impacts of (or threats from) invasive plants to natural and cultural resources and provide opportunities for restoring native plant communities and cultural landscapes.

This IPMP/EA is intended to provide strategies for park staff to manage terrestrial and emergent wetland invasive plants on both NPS and NPS managed lands within the designated boundaries of the 10 Great Lakes parks.

**Public Scoping Opportunities**

The National Environmental Policy Act (NEPA) regulations at 40 CFR 1501.7 requires an early and open process to determine the scope of issues to be addressed and for identifying the significant issues related to a proposed action in an EIS. This process is termed “scoping.”

The formal public scoping period for the IPMP/EA will be held from approximately March 28, 2011 until May 2, 2011. The public will be encouraged to provide input on the proposed IPMP during this time. However, as a valued stakeholder in our park’s resources, we are providing you advance notice of our intent to prepare the IPMP/EA.

During the formal scoping period we will be inviting you to submit your comments, thoughts and suggestions regarding the project. Information on how to submit these comments will be provided at a later date.

Interested parties should also know that once the Draft EA is completed it will be made available for a 30-day public review and comment period. The NPS anticipates that the Draft IPMP/EA will be published for public review in the spring of 2012.

Sincerely,

---

**Park Superintendent Name**  
Superintendent

---

Date



**National Park Service**  
**U.S. Department of the Interior**

Great Lakes Region

2800 Lakeshore Drive E.,  
Suite D  
Ashland, WI 54806  
715 682-0631 phone  
715 682-6190 fax

---

## Great Lakes Region News Release

**March X, 2011**

For Immediate Release

Contact: Carmen Chapin, 715-682-0631 ext. 30

### **Great Lakes Invasive Plant Management Plan / Environmental Assessment**

The National Park Service (NPS) is planning to prepare an Environmental Assessment (EA) for a Great Lakes Invasive Plant Management Plan (IPMP) for the following ten parks located in the Great Lakes region: Apostle Islands National Lakeshore (APIS), Grand Portage National Monument (GRPO), Ice Age National Scenic Trail (IATR), Indiana Dunes National Lakeshore (INDU), Isle Royale National Park (ISRO), Mississippi National River and Recreation Area (MISS), Pictured Rocks National Lakeshore (PIRO), Sleeping Bear Dunes National Lakeshore (SLBE), St. Croix National Scenic River (SACN), and Voyageurs National Park (VOYA).

The Great Lakes IPMP/EA will be based on sound integrated pest management (IPM). IPM is defined as a decision-making process that coordinates knowledge of pest biology, the environment, and available technology to prevent unacceptable levels of pest damage, by cost-effective means, while posing the least possible risk to people and park resources.

Based on the purpose and need for the project, the scope of the Great Lakes IPMP EA will be to develop a plan that identifies long-term invasive plant management tools that would reduce the impacts of (or threats from) invasive plants to natural and cultural resources and provide opportunities for restoring native plant communities and cultural landscapes.


This IPMP/EA will be intended to provide strategies for park staff to manage terrestrial and emergent wetland invasive plants on both NPS and NPS managed lands within the designated boundaries of the 10 Great Lakes parks.

### **Public Scoping Opportunities**

The National Environmental Policy Act (NEPA) regulations at 40 CFR 1501.7 require an early and open process to determine the scope of issues to be addressed and for identifying the significant issues related to a proposed action. This process is termed "scoping."

The public scoping period for the Great Lakes IPMP/EA is from March 28, 2011 until May 2, 2011. The public is encouraged to provide comments electronically through the NPS' Planning, Environment and Public Comment (PEPC) database at: <http://parkplanning.nps.gov/ipmpea>.

Comments may also be mailed to: Great Lakes IPMP, c/o Kleinfelder, 300 E. Mineral Avenue, Suite 7, Littleton, CO 80122-2655.



Comments must be received by, time-stamped, and/or post-marked by May 2, 2011, 5:00pm eastern standard time (EST). Before including your address, phone number, email address, or other personal information in your comments, you should be aware that your entire comment - including your personal identifying information - will be included in the administrative record for the IPMP/EA, and may be made publicly available at any time. While you may ask us in your scoping comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. Scoping comments may also be published as part of the IPMP/EA. All submissions from organizations or businesses will be made available for public inspection in their entirety.

During the public scoping period, public meetings may be held at the discretion of the individual parks within the Great Lakes region. Notices of public meetings will be advertised in local newspapers, park administrative offices, and on the PEPC website. For more information, please visit the project website at <http://parkplanning.nps.gov/ipmpea> or contact Carmen Chapin at 715-682-0631 ext. 30.

Interested parties should also know that once the Draft IPMP/EA is completed it will be made available for a 30-day public review and comment period. The NPS anticipates that the Draft IPMP/EA will be published for public review in the spring of 2012.

-NPS-



National Park Service  
Great Lakes Network Office  
2800 Lakeshore Drive E., Suite D  
Ashland, WI 54806

Great Lakes Region  
Invasive Plant Management Plan  
Environmental Assessment

National Park Service  
U.S. Department of  
Interior



**PUBLIC SCOPING FOR:  
Great Lakes Invasive Plant Management Plan  
Environmental Assessment**

The National Park Service (NPS) is planning to prepare an Environmental Assessment (EA) for a Great Lakes Invasive Plant Management Plan (IPMP) for the following ten parks located in the Great Lakes region:

- Apostle Islands National Lakeshore
- Grand Portage National Monument
- Ice Age National Scenic Trail
- Indiana Dunes National Lakeshore
- Isle Royale National Park
- Mississippi National River & Recreation Area
- Pictured Rocks National Lakeshore
- Sleeping Bear Dunes National Lakeshore
- St. Croix National Scenic Riverway
- Voyageurs National Park



Photo courtesy of: Daniel P. Hojnacki

The public scoping period for the Great Lakes IPMP/EA is from **March 28, 2011** until **May 2, 2011**. The public is encouraged to provide comments electronically through the NPS' Planning, Environment and Public Comment (PEPC) database at: <http://parkplanning.nps.gov/ipmpea>

Comments may also be mailed to:  
Great Lakes IPMP, c/o Kleinfelder, 300 E. Mineral Avenue, Suite 7, Littleton, CO 80122-2655.

Comments must be received in writing by, time-stamped, and/or post-marked by:  
**May 2, 2011, 5:00pm** eastern standard time (EST).



*"....to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations"*

National Park Service - The Organic Act of 1916

## PROJECT BACKGROUND

The Great Lakes Invasive Plant Management Plan (IPMP) / Environmental Assessment (EA) will be based on sound integrated pest management (IPM). IPM is defined as a decision-making process that coordinates knowledge of pest biology, the environment, and available technology to prevent unacceptable levels of pest damage, by cost-effective means, while posing the least possible risk to people and park resources.

Based on the purpose and need for the project, the scope of the Great Lakes IPMP EA will be to develop a plan that identifies long-term invasive plant management tools that would reduce the impacts of (or threats from) invasive plants to natural and cultural resources and provide opportunities for restoring native plant communities and cultural landscapes.

This IPMP/EA will be intended to provide strategies for park staff to manage terrestrial and emergent wetland invasive plants on both NPS and NPS managed lands within the designated boundaries of the ten Great Lakes parks.

## PUBLIC SCOPING OPPORTUNITIES

The National Environmental Policy Act regulations at 40 CFR 1501.7 require an early and open process to determine the scope of issues to be addressed and for identifying the significant issues related to a proposed action. This process is termed "scoping."

Comment submittal instructions are included on the other side of this brochure.

Before including your address, phone number, email address, or other personal information in your comments, you should be aware that your entire comment - including your personal identifying information - will be included in the administrative record for the IPMP/EA, and may be made publicly available at any time. While you may ask us in your scoping comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. Scoping comments may also be published as part of the IPMP/EA. All submissions from organizations or businesses will be made available for public inspection in their entirety.

During the public scoping period, public meetings may be held at the discretion of the individual parks within the Great Lakes region. Notices of public meetings will be advertised in local newspapers, park administrative offices, and on the PEPC website. For more information, please visit the project website at <http://parkplanning.nps.gov/ipmpea> or contact Carmen Chapin at 715-682-0631 ext. 30.

Interested parties should also know that once the Draft IPMP/EA is completed it will be made available for a 30-day public review and comment period. The NPS anticipates that the Draft IPMP/EA will be published for public review in the spring of 2012.





United States  
Department of  
Agriculture

Forest  
Service

Hiawatha National Forest  
Munising District

400 East Munising Avenue  
Munising, MI 49862  
(906) 387-2512

File Code: 1900 Planning

Date: April 13, 2011

**To:** Great Lakes IPMP  
Attn: Kleinfelder  
300 E. Mineral Avenue, Suite 7  
Littleton, CO 80122-2655

**Subject:** Great Lakes Invasive Plant Management Plan/Environmental Assessment

The Hiawatha National Forest has received your letter dated March 14, 2011, and the March 21, 2011, News Release regarding the proposed Invasive Plant Management Plan for the ten parks located in the Great Lakes Region. We were encouraged to see your proposal. The Hiawatha National Forest is also concerned about invasive plants and their potential to disrupt native ecosystems. Coordination with your agency, particularly Pictured Rocks National Lakeshore, allows landscape scale conservation efforts to be implemented and for the potential to protect ecosystems across boundaries.

The Hiawatha currently has several tools available for controlling invasive plants. In 2007, we completed an Environmental Assessment that authorized a variety of tools for invasive species control including manual, mechanical, herbicides, and biological techniques. We have been implementing the decision since 2007. We are currently in the process of preparing a new EA that will use similar treatment techniques on additional locations known to be infested with non-native invasive plants. The focus of the project will be roadsides, gravel pits, recreation portal areas, openings and other disturbed areas. It will also incorporate 200 to 300 acres of non-FS lands within and near the proclamation boundary of the Hiawatha National Forest. Including other ownerships will allow the control of invasive species to occur at a larger scale. Further, the Hiawatha has an active native plant program including a greenhouse that produces over 35,000 native plugs a year which we are using to restore disturbed areas.

The Hiawatha National Forest supports the proposal and looks forward to working with you in the future to control the impact of invasive plants on our natural communities. Please forward a copy of the EA when it is complete.

Sincerely,

*James F. Gries*  
Acting District Ranger

CC:  
Bruce Leutscher – Pictured Rocks National Lakeshore



Caring for the Land and Serving People

Printed on Recycled Paper





## PEPC Project ID: 34281, DocumentID: 39820

### Correspondence: 1

#### Author Information

Keep Private: No

Name: Jan McDonald

Organization: Adopt a Beach

Organization Type: I - Unaffiliated Individual

Address: Traverse City, MI 49696  
USA

E-mail:

#### Correspondence Information

Status: New Park Correspondence Log:

Date Sent: 03/29/2011 Date Received: 03/29/2011

Number of Signatures: 1 Form Letter: No

Contains Request(s): No Type: Web Form

Notes:

#### Correspondence Text

Topic Question 1:

My main concern is the type of agent that will be used to control the invasive plant species. In the past, we introduce species to counteract other species and then THAT spirals out of control. . . .particularly in our waters. Thank you.

## PEPC Project ID: 34281, DocumentID: 39820

### Correspondence: 2

#### Author Information

Keep Private: No

Name: Savannah M. Howington

Organization: NPS

Organization Type: I - Unaffiliated Individual

Address: 7540 SW 59th Ct #38  
South Miami, FL 33143  
USA

E-mail: gourmetchefpirate@yahoo.com

#### Correspondence Information

Status: New Park Correspondence Log:

Date Sent: 03/29/2011 Date Received: 03/29/2011

Number of Signatures: 1 Form Letter: No

Contains Request(s): No Type: Web Form

Notes:

#### Correspondence Text

Topic Question 1:

First, I want to clarify that my opinions do not represent those of my employer, the Everglades National Park. I am submitting my comments as part of the public comment.

Second, my concerns:

+ I feel that the plan should emphasize that the need for including the 10 participating NPS units in the same plan is because the spread of invasive plants may very well be one that originates in one park is transferred to another park. In other words, the problem and solution must be viewed from the perspective of invasive species in each individual park unit and then from a regional landscape.

+There should be a level of synthesis of what is already known and then what is needed to understand the spread of invasive species within a park and the risk of those species spreading to designated wilderness, adjacent lands, and in particular, other federally managed lands.

+Determining the origin of invasive species is important including any continuous sources that cannot easily be

controlled such as wind, water, and wildlife.

+A landscape approach should be emphasized that generates an understanding of past, present, and potential future outcomes of invasive plant spread with the alternatives.

+The effect of changing weather patterns, areas with poor water quality, and urban growth should be included in a study of how invasive plants might be managed.

Topic Question 2:

\*Why invasive plant management should or shouldn't be implemented in the Great Lakes National Parks?

+ I have already made up my mind that invasive plant management should be implemented. Alternatives that might be evaluated might consider a simple analysis of the number of known invasive plants in the Great Lakes region by park unit, the number of years each park has already had a plan or actions taken to address invasive plants, the money spent, and the success rate. In other words, an alternative to just bring the issue to light is what has been done or is being done now enough to negate the need for more effort or are invasive plants spreading beyond adjacent lands into the parks and vice versa at an uncontrollable rate despite the cost and effort to date being taken?

+The beach and dune areas along the shores of the lakes should be of particular concern and both removal of plants and plantings can potentially impact those ecosystems. Restoring the native vegetation should be a priority and addressed in the context of the role plants have in sand and soil stabilization and food for migrating animals.

+The potential impact invasive plants are having on the initial spring food supplies for hibernating animals should be considered as both a justification for the need for the plan and in the management alternatives for invasive plant control.

\*Management tools such as outreach and education, prevention and control that should or shouldn't be implemented in the Great Lakes National Parks?

+Along with the removal invasive plants, at least one alternative might include the restoration planting of the displaced native plants.

+Outreach might include alternatives to a program to organize volunteers and school groups for removal of invasive plants and restoration planting of native plants.

\*Species or areas that should or shouldn't be considered in an invasive plant management program for the Great Lakes National Parks?

+The spread of genetic hybrids should be a secondary concern to controlling invasive species that are already hard to distinguish. An example is cattail hybrids. The emphasis should first be on if the plant is an invasive or exotic impacting the area. If there is an impact of the plant as an invasive, but there is a question of whether or not it is a native, then the question of whether or not it is a hybrid can be pursued. Part of this question is how management of the hybrid will improve or impact biodiversity.

I look forward to seeing the progress of the scoping period.

## PEPC Project ID: 34281, DocumentID: 39820

### Correspondence: 4

#### Author Information

Keep Private: No

Name: Shaun C. Howard

Organization: The Nature Conservancy in Michigan

Organization Type: I - Unaffiliated Individual

Address: 3728 West River Dr NE  
Comstock Park, MI 49321  
USA

E-mail: showard@tnc.org

#### Correspondence Information

Status: New Park Correspondence Log:

Date Sent: 05/02/2011 Date Received: 05/02/2011

Number of Signatures: 1 Form Letter: No

Contains Request(s): No Type: Web Form

Notes:

#### Correspondence Text

The Nature Conservancy fully supports the National Park Service's proposed Environmental Assessment for a Great Lakes Invasive Plant Management Plan (IPMP) in 10 Great Lakes region parks. The proposed IPMP is based on the principles of Integrated Pest Management (IPM), ensuring cost-effective control methods implemented with minimal risk to desirable natural resources. Recognizing the incredible threat posed by invasive species, in 2007 The Nature Conservancy and the National Park Service formed a partnership to implement invasive plant control in the Sleeping Bear Dunes National Lakeshore. These efforts have been highly successful; to date we have removed 47 percent of the baby's-breath infestation that once covered over 1,800 acres of coastal dune ecosystems and are now expanding our focus to a number of other regional invasives. While it's clear that much has been accomplished, future work will greatly benefit from IPM and we believe every effort should be made to compose future management strategies using its framework.

While concerns about the use of herbicides are valid, IPM provides a guide to the safest and most beneficial ways in which to use them and clearly defines when their use is inappropriate. Within the Lakeshore, the herbicides have not only been thoroughly tested for effectiveness, but also for their effect on the sensitive native

communities. By combining highly-specific application methods with herbicides that are reduced to inert organic compounds upon contact with non-target materials, there has been no observed damage to the native species present in the area, including federally-threatened Pitcher's thistle (*Cirsium pitcher*) and federally-endangered piping plover (*Charadrius melodus*). As IPM dictates, the results of our efforts will be carefully reviewed and the methodology of those efforts altered as necessary to provide the greatest possible improvement to both the area's ecology and its benefit to the public.

Without the comprehensive, large-scale vision that the Great Lakes Invasive Plant Management Plan provides, ongoing protection for our National Parks will be less effective and more costly. A plan that encompasses the entire Great Lakes region has the ability to provide information on existing invasive species distribution and spread more readily; essentially an early-warning system to prevent emergent populations from becoming unmanageable infestations. Based on a huge body of collective expertise, the plan also ensures park managers identify and implement the best tools and resources for long-term control and eradication of targeted invasives. Effectively managing and eradicating invasive plants in the treasures we call our Great Lakes National Parks is of the utmost importance, and through an Invasive Plant Management Plan it is a thoroughly attainable goal.



**PEPC Project ID: 34281, DocumentID: 39820**

**Correspondence: 3**

**Author Information**

Keep Private: Yes  
Name: C M  
Organization:  
Organization Type: I - Unaffiliated Individual  
Address:  
Glasgow, UN GW16FF  
GBR  
E-mail:

**Correspondence Information**

Status: New Park Correspondence Log:  
Date Sent: 04/06/2011 Date Received: 04/06/2011  
Number of Signatures: 1 Form Letter: No  
Contains Request(s): No Type: Web Form  
Notes:

**Correspondence Text**

Topic Question 1:  
Just looking