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## PICTURED ROCKS NATIONAL LAKESHORE: PERSONAL WATERCRAFT USE ENVIRONMENTAL ASSESSMENT

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### PUBLIC SCOPING CORRESPONDENCE RECEIVED OCTOBER 9 – NOVEMBER 9, 2012

<b>Correspondence ID:</b>	1	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,09,2012 14:42:32				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	On the proposed use of motor powered personal watercraft... no, no, no. A thousand times no! There are many of us who really, really value going to a National Park or Lakeshore for sounds that only come from nature. To be hiking, or canoeing or kayaking and have this solitude disturbed by someone on a powered vehicle is horrible. There are so many other places in the Upper Peninsula of Michigan where people who don't care or value solitude can run their on-water/on-land recreational vehicles. Please don't let Pictured Rocks be one of them!				
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<b>Correspondence ID:</b>	2	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,09,2012 00:00:00				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	Over the years, while working at two nature centers in West Michigan, I have led both backpacking and kayaking trips to Pictured Rocks National Lakeshore. On all occasions, considerable time was spent either hiking the bluffs or paddling the cliff faces. We camped several nights along the shoreline. We never had any disturbance by personal watercraft during our stays but I can assure you, we would have been very unhappy about the experience if we had to listen to the noise from their use. I would strongly prefer that small, motorized craft of any sort, be limited to areas with less of a wilderness aspect. Exclusion should include Beaver Lake, Miners Beach and basically any remote shoreline beach areas. There is a public beach area at the far west end near the headquarters, that could be made to accept pwc. Maybe that could be alright as long as they stay in the area where there are more people and homes. Thanks for the opportunity to comment.				
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<b>Correspondence ID:</b>	3	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,09,2012 19:50:35				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	Personal watercraft (PWC)should be banned from Pictured Rocks National Lakeshore. This is a pristine area that needs be protected for its natural beauty. There are many, many other areas on Lake Superior and many other lakes that personal watercraft have access to. PWC negatively impact water quality, air quality, wildlife and are downright annoying to people trying to enjoy the peaceful atmopshere of the natural environment offered by the Picture Rocks National Park. For the sake of the much sought after and treasured wildlife experience, please do not allow PWC in the Pictured Rocks! Thank you.				
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<b>Correspondence ID:</b>	4	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,15,2012 15:12:26				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	Please don't take this shoreline access away from us. I hope you will allow the use of PWC on Lake Superior along the full length of the park. Please allow us to land our PWC on the shoreline anywhere we want to. Government has taken enough of our rights away from us now. Thank You				
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<b>Correspondence ID:</b>	5	<b>Project:</b>	39835	<b>Document:</b>	50079

**Received:** Oct,15,2012 15:13:23  
**Correspondence Type:** Web Form  
**Correspondence:** Please do not allow PWC use anywhere in Pictured Rock's waters. These vehicles are noisy, pollute the air and water and are totally inconsistent with the character of the Lakeshore. This is not an area with a long tradition of "beach-like" recreational use of the lake. The PWC issue is just the aquatic side of the ATV issue and snowmobile issue facing other national parks. As new technology is created, the NPS must hold the line, deciding on a case by case basis which forms are appropriate and where.  
One of the "intangible" elements of the Superior shoreline experience is a sense of remoteness, a "sense of lonely." A sense that instills respect in one for the hardy Indians and Europeans who lived in this forbidding environment. That's hard to achieve with the whine of a PWC in the distance.  
There are other places they can do that. Let's keep some places for solitude.  
Thank you.

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**Correspondence ID:** 6    **Project:** 39835    **Document:** 50079  
**Received:** Oct,16,2012 18:28:19  
**Correspondence Type:** Web Form  
**Correspondence:** I am against allowing PWC in the National Park of Picture Rocks and feel that it would have a negative impact on the surrounding area of wild life and disrupt the peaceful feeling of nature of the park.  
I agree with all of these listed concerns. Water Quality PWC engines can discharge gas and oil emissions directly into the water, resulting in potential impacts to water quality. Air Quality PWC engines emit hydrocarbons, nitrogen oxide, and carbon monoxide which are known to impact air quality. Soundscapes Noise from PWCs can negatively impact the experience of park visitors, especially those desiring a more natural or serene experience. Wildlife PWC movement and noise can disturb wildlife, especially waterfowl and shorebirds, potentially impacting reproductive success of these species. PWCs can also contribute to the spread of exotic species, such as the quagga mussel. Special Status Species The park's shoreline provides important habitat for sensitive species including piping plovers, peregrine falcons, bald eagle, osprey, merlins, and loons. These species may be disturbed by PWCs in the same way as described above for wildlife. Visitor Conflicts and Safety PWCs operate in areas that are currently used by swimmers, kayakers, commercial cruises, and other boaters. Increased park use could result in overcrowding in popular areas, increasing the potential for visitor conflicts and safety concerns. Backcountry and Wilderness Park visitors' backcountry and wilderness experience could be negatively affected by noise from PWC use adjacent to backcountry and designated Wilderness areas in the park. Park Operations Managing PWC use may impact park operations by requiring additional staff and funding for law enforcement, resource protection, and visitor education and outreach. Cultural Resources PWC use has the potential to impact cultural resources at the park such as underwater shipwrecks, the Au Sable lighthouse cultural landscape, and Native American sites and resources.  
No PWC~ thank you!

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**Correspondence ID:** 7    **Project:** 39835    **Document:** 50079  
**Received:** Oct,17,2012 12:36:25  
**Correspondence Type:** Web Form  
**Correspondence:** I believe that banning personal watercraft at a park while not having justification to ban boats is an absolute injustice to the american people.  
There is very little difference between damage a boat will do to an environment versus a PWC. In fact, because PWC have no exposed prop they often do no damage to marine life, where boats cause damage. PWC are extremely quiet now that they are four stroke, they have lower emissions than most boats in use on the water today. Look at Lake Mead where they found no reason to ban four stroke PWC at all. In fact, all you have to do to see what kind of damage outboard boats cause to seagrass is fly over the Keys. That damage was not caused by PWC, it's been proven. To make the statement PWC cause more damage to seagrass is ridiculous, seagrass will immediately stop up a PWC pump, so the users stay away from it. This policy is just because one group of people dislikes another group of users and that is an absolute injustice. Someone at a higher level has the responsibility to say, this is not right.

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**Correspondence ID:** 8    **Project:** 39835    **Document:** 50079  
**Received:** Oct,17,2012 14:58:55  
**Correspondence Type:** Web Form  
**Correspondence:** Both my husband and myself would vote to eliminate PWCs entirely from the park. However, the next best thing would be extremely limited use at all times.

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**Correspondence ID:** 9    **Project:** 39835    **Document:** 50079  
**Received:** Oct,18,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** I appreciate the opportunity to provide my comments.  
My objective is to help clear some misconceptions about PWC and the people who ride them. The 'modern day' PWC is leaps and bounds ahead of those built even as recently as 2005. They are very environmentally friendly and most put out less emissions than most boats on the water. Because of the technology available today, the sound impact is far less than it used to be. The average PWC rider is far more responsible than the general non-riding public gives them credit for. We truly care about and appreciate the lakes and rivers and environment in which we ride. The group of PWC riders I represent (Grand Tour) spend a great deal of their time and hard earned money each year to help raise money for charity (Leader Dogs for the Blind). During our ride, we take great pride in showing the observing communities how we can make a positive impact in the lives of others and at the same time show great respect for others, such as the boating community, water-front property owners, and others who are enjoying the same natural resources. I also feel any legislation to ban PWC at the National Park shows intentional discrimination against PWC owners. As I stated previously, today's PWC are vastly improved over the watercraft of yesteryear and are equal to or better than most boats. To ban PWC for the reasons explained but not have that ban pertain to boats is not right. Therefore based on my reasons stated above, I am suggesting you adopt the following: Allow PWC use on Lake Superior along the full length of the park (approximately 42 miles), within the park's 0.25-mile jurisdictional boundary. PWC users could land anywhere on shoreline. I would also be open to the following measure being added to the legislation: Restrict PWC use to only those with 4-stroke engines or best available. Again, thank you for the opportunity to provide my input.

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**Correspondence ID:** 10    **Project:** 39835    **Document:** 50079  
**Received:** Oct,18,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** I find it hard to believe that jet skis produce more waste than boats. Boats of any size but lets think about this for a minute. A larger boat makes more waves, has more power, has a deeper hull and its propeller is deeper which would make more movement and sound. I am an ex- Jet skier and now boat owner. I think it is crazy that PWCs are getting attacked like this. If your going to look into equality than look into freighters and commercial boats that go through, Oh wait you don't want to do that because it will ruin the economy of business. Well, take one minute to think how much money PWCs bring to the economy. We use to travel up north JUST to go jet skiing. We purchased gas, food, hotel, and the occasional gift from gift shops. I am all about making and protecting our waters but come on. PWCs?! Really? Thats what you want to eliminate or "fine" with permits to ride there? That seems to political to me. This comes just around the time we start to make our plans for this next summer too. this may be the first year in 15 that we do not take the up north trip with the family. I'll just have to sit back and watch.

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**Correspondence ID:** 11    **Project:** 39835    **Document:** 50079  
**Received:** Oct,19,2012 08:50:18  
**Correspondence Type:** Web Form  
**Correspondence:** Please prohibit the use of PWC at Pictured Rocks National Lakeshore. In the Great Lakes Regions there are thousands of square miles where PWCs can operate with no restrictions. There needs to be a few small places protected from the noise, air, and water pollution of PWCs. Pictured Rocks is one of the very, very few places remaining where a person can experience the sounds of nature and silence without the interruption of noise from PWCs.

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**Correspondence ID:** 12    **Project:** 39835    **Document:** 50079  
**Received:** Oct,19,2012 09:19:21  
**Correspondence Type:** Web Form  
**Correspondence:** I strongly urge you to prohibit all PWC use within Pictured Rocks National Lakeshore. Because of the negative impact of PWCs on all of the issues mentioned in your brochure (air quality, water quality, noise, wildlife disturbance, etc), PWC use is inappropriate within a National Park/National Lakeshore. PWCs may be used on a vast majority of lakes in the USA, but they certainly don't belong everywhere, including our National Parks and National Lakeshores. Please hold firm and prohibit their use completely within Pictured Rocks National Lakeshore. Thanks for the opportunity to comment.

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**Correspondence ID:** 13    **Project:** 39835    **Document:** 50079  
**Received:** Oct,19,2012 10:52:21  
**Correspondence Type:** Web Form  
**Correspondence:** It would be a very sad thing to omit pwc from our park.there is more damage done by the thousands of hikers and boaters visting the park every year than could ever be done by the pwc's. I have played and lived in this park for over 50 years and you need to take the high road, be fair to all.not to mention all the revenue that would be stripped from the area. thank you

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**Correspondence ID:** 14    **Project:** 39835    **Document:** 50079  
**Received:** Oct,20,2012 15:28:10  
**Correspondence Type:** Web Form  
**Correspondence:** I live on a lake in Southeastern Wisconsin and am a PWC owner. I am on the Board of our lake association and actively work to maintain the quality of this lake. PWC's have been the "fall guy" for many lake issues. We have been impacted by Zebra Mussels and Eurasian Watermilfoil and have found that it IS NOT the PWC's that contribute to the spread but rather the fishermen who roam from lake to lake never bothering to wash their boats or remove seaweed from their trailers. The boat noise and foul language at day break are not "Jet Skiers". How some judge can single out one type of craft banning PWC's from access to Pictured Rocks National Lakeshore is insane. Today's PWC's are quieter and cause far less environmental harm than most other water craft. It is grossly unfair to penalize one class of boaters on the whim of some special interest group. I urge the US District Court to review this decision and correct the error this judge made.

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**Correspondence ID:** 15    **Project:** 39835    **Document:** 50079  
**Received:** Oct,21,2012 14:38:19  
**Correspondence Type:** Web Form  
**Correspondence:** My wife and I are frequent visitors to the park and we both would like to see a COMPLETE PROHIBITION of Personal Watercraft (PWC) or "thrillcraft" within the whole park. These people who ride around on jet skis are communing with their machines, not nature. They frequently ride in a circle - going nowhere fast, and in the mean time cause collateral disruption of the "natural" park experience for all other non participants of their activity. Their noisy and smelly "riding around" is really sociopathic and shows a complete lack of respect for others desire for a different kind of experience. They either enjoy the fact that they are disrupting others, or are so oblivious to their side effects that they actually think that as long as they are ok with their noise and wildlife disruption that everyone else should be too. Non-motorized activities on the other hand like hiking & kayaking have a far less tendency to disturb other non-participant humans as well as wildlife.

PWC use in the park is just not acceptable for all the reasons that are important for a National Park experience. PWC: 1. disturb wildlife and other park visitors, 2. pollute air (noise & exhaust fumes) and water, 3. threaten the safety of non motorized, silent sports participants within the park, 4. create the need for expensive regulation and enforcement of their activity because of their inherently disruptive tendencies, 5. disrupt fishing activities, 6. contributes to the unhealthy obesity epidemic ( a major public health problem) since these people are just riding around on a motorized couch and getting very little excersize, 7. contributes to global warming for well, just a few thrills from their machine.

PWC activities can destroy the escape into the natural world so many of us are looking for within our National Parks. We want and expect a full ban of PWC within the park. Educating those who are insisting that they be able to use their PWC that it will be healthier and better for them in the long run if they learn to use their arms and legs for something other than props on a machine, is a good angle to take when explaining to them why the ban is going into effect. Sell the PWC, buy a kayak and then come enjoy the park.

PS Please feel free to read our statement at the public hearings, it would be appreciated. Marquette, MI

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**Correspondence ID:** 16    **Project:** 39835    **Document:** 50079  
**Received:** Oct,21,2012 19:21:53  
**Correspondence Type:** Web Form  
**Correspondence:** I support the use of PWC's in the Pictured Rocks National Lakeshore. These boats have no enviromental impact on the park whatsoever, and are likely less disruptive than any of the other marine craft that are allowed on the lake. They are highly refinded watercraft that are evironmentally friendly and safe for the operator and marinelife. They are a low cost boating alternative for many people that provide a great way to enjoy the out of doors. Pictured Rocks are best seen and enjoyed from the water and these machines are a

great way to allow people to make to most of their experience at the park. Please support the use of PWC's. Thank you.

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**Correspondence ID:** 17    **Project:** 39835    **Document:** 50079  
**Received:** Oct,22,2012 07:27:33  
**Correspondence Type:** Web Form  
**Correspondence:** I am adamantly opposed to allowing PWC along the entire shoreline of Pictured Rocks National Lakeshore. I understand that they have previously been allowed use from Sand Beach to Miner's Castle. My objection is based on the following:  
Backcountry & Wilderness: Pictured Rocks needs to be reserved for the wilderness experience. There are very few places one can paddle or hike a shoreline to enjoy what nature has created without hearing and seeing a plethora of loud PWCs. These watercraft would totally decimate the experience. In addition, the few beaches along the way would be littered with PWBs, ruining the rustic nature of the area.  
Camping: Another issue is camping along the lakeshore. Currently the only way to get to most of the campsites are to hike in or paddle in. Opening the area up to PWCs will ruin the camping experience and will significantly reduce the availability of campsites.  
Wildlife: I have personally paddled the lakeshore and know full well the wildlife that lives along the shoreline. The wildlife (especially the birds) will be severely impacted by the noise and ability of PWCs to come very close to nesting areas.  
Overall Serenity: The National Lakeshore was set aside to protect the area and allow visitors to enjoy the lakeshore as it has been for centuries. Allowing PWCs into the area will destroy the overall feel of the lakeshore and will ruin the rustic nature and natural beauty of the area.  
I strongly recommend either restricting PWCs to their current allowance (Sand Beach to Miners Castle) or better yet to ban PWCs from the National Lakeshore in their entirety.

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**Correspondence ID:** 18    **Project:** 39835    **Document:** 50079  
**Received:** Oct,22,2012 07:37:03  
**Correspondence Type:** Web Form  
**Correspondence:** Corrected spelling:  
I am adamantly opposed to allowing PWC along the entire shoreline of Pictured Rocks National Lakeshore. I understand that they have previously been allowed use from Sand Beach to Miner's Castle. My objection is based on the following:  
Backcountry & Wilderness: Pictured Rocks needs to be reserved for the wilderness experience. There are very few places one can paddle or hike a shoreline to enjoy what nature has created without hearing and seeing a plethora of loud PWCs. These watercraft would totally decimate the experience. In addition, the few beaches along the way would be littered with PWBs, ruining the rustic nature of the area.  
Camping: Another issue is camping along the lakeshore. Currently the only way to get to most of the campsites are to hike in or paddle in. Opening the area up to PWCs will ruin the camping experience and will significantly reduce the availability of campsites.  
Wildlife: I have personally paddled the lakeshore and know full well the variety of wildlife that lives along the shoreline. The wildlife (especially the birds) will be severely impacted by the noise and ability of PWCs to come very close to nesting areas.  
Overall Serenity: The National Lakeshore was set aside to protect the area and allow visitors to enjoy the lakeshore as it has been for centuries. Allowing PWCs into the area will destroy the overall feel of the lakeshore and will ruin the rustic nature and natural beauty of the area.  
I strongly recommend either restricting PWCs to their current allowance (Sand Beach to Miners Castle) or better yet to ban PWCs from the National Lakeshore in their entirety.

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**Correspondence ID:** 19    **Project:** 39835    **Document:** 50079  
**Received:** Oct,22,2012 14:26:09  
**Correspondence Type:** Web Form  
**Correspondence:** I am sending this note to comment upon the use of personal watercraft use at Pictured Rocks. I currently live in California. Moved here 7 years ago. I previously lived in Chicago and discovered Pictured Rocks shortly after it became a national park. 7-8 hour drive and so worth it. Remember when the headquarters was in a Coast Card station? What a thrill to discover this most unusual and beautiful place. I have backpacked there probably about 12 times over the years taking novice backpackers into what to them was an amazing experience. As an avid backpacker and wilderness lover who has experienced wilderness all over the country, this is a gem, not just of the Midwest where there is little wilderness to

enjoy. A national gem.

What is so surprising is that Lake Superior has what ?? 1,800 miles of shoreline? Aren't there enough places for boaters to enjoy? Do they have to literally ruin / destroy the wilderness experience on 42 miles of wilderness shoreline? It does not work! What happened to the other 1,758 miles?

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**Correspondence ID:** 20    **Project:** 39835    **Document:** 50079

**Received:** Oct,22,2012 14:45:00

**Correspondence Type:** Web Form

**Correspondence:** I support use of PWC at Pictured Rocks. I've been riding jetskis for over 20 years and have seen vast improvements with 4-stroke engines with much less noise and fewer emissions. Even one of the greatest opponents of jetskis on our lake remarked on how quiet the 4-strokes are. In addition, riders have expanded to include families and people of all ages looking for a nice way to cruise and enjoy the lake and scenery - not just thrill seekers trying to jump waves or scare each other. More models are made for cruising, quiet running, fuel efficiency, and environmental quality. They are no different than other boats running 4-stroke engines. I've enjoyed riding on Lk Superior on a calm day and being able to slowly come up to cliffs and rocks to stop and pause briefly to admire the incredible rock formations up close near Marquette. A wonderful cruise that I'd like to also do along Pictured Rocks some day. We are well aware of our maneuverability and would certainly give way to the larger sightseeing cruise vessels. We also know about and follow the required safety equipment and rules for PWC on the Great Lakes. Please allow the use of PWC at Pictured Rocks National Lakeshore. Thank you.

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**Correspondence ID:** 21    **Project:** 39835    **Document:** 50079

**Received:** Oct,22,2012 17:34:18

**Correspondence Type:** Web Form

**Correspondence:** I stand in support of Boating in and around the park by all.  
I cannot see how responsible boaters of any watercraft cause any serious harm over any other type of watercraft? Granted, wreckless boaters are a nuisance, but rather than assuming all PWC'ers are going to ruin the park, keep in mind that things are very different than they were in the "hey day" of jet ski sales which have long ago dropped dramatically. Also, wherever I go, I see that boats outnumber PWC's by a large margin. Therefore I don't understand what the deal is about singling out jet skiers over any other boater?  
Concerning pollution, I will attest that my 150 HP 2006 Kawasaki is vastly cleaner than my 1984 Evinrude 60 horse (on my beloved Starcraft). This goes the same for noise emission, as well.  
Regarding PWC "damage," most places I go have a 100' Slow No Wake zone for my boat and a 200' zone for my PWC. I understand that inexperienced persons need to have a buffer zone for safety, but the boat kicks up much more wake and would damage shorelines etc. much more so than my PWC.  
Back in the 90's when PWCs were selling like hot cakes, it was much more common to see novices really zipping in and around other boaters, jet skiers and swimmers. Honestly, haven't you seen any change in behavior in the last decade? Also most PWC operators who are going to ride "big water" are not the type who are zinging around in small circles near a shoreline or other people. They are likely to be possessing the most experience and best judgment.  
Of course, this is not going ever be without incident, I'm sure. But it just seems that all too often, a few "bad apples" ruin it for everyone. That may be a fine "rule" for grade school, but I don't think it's necessary for the majority of adults. If it were, I'm sure that automobiles would be banned from driving the roads of our free land. Thanks for your consideration.

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**Correspondence ID:** 22    **Project:** 39835    **Document:** 50079

**Received:** Oct,23,2012 00:00:00

**Correspondence Type:** Web Form

**Correspondence:** As an advocate of motorized recreation, my personal observation is to maintain the same regulations and requirements as all other watercraft, nothing more or less. I feel discrimination toward one particular mode is unfair. Motorcycles have the same rights as other vehicles on all our nation's highways and a PWC should have the same rights as other vessels on the water. If other vessels are eligible for alternative #3, then PWC's should also be eligible, and I support #3, otherwise, I would be in favor of maintaining alternative #1. Than k you for the opportunity to voice my opinions.

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**Correspondence ID:** 23    **Project:** 39835    **Document:** 50079

**Received:** Oct,23,2012 11:50:23

<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	I have visited and enjoyed Pictured Rocks several times, but will never visit again if personal watercraft are allowed. There are many, I would say too many areas where these obnoxious machines are allowed to disturb the peace. If they are allowed at Pictured Rocks, my family will stay away; it just would not be worth our while.		
<b>Correspondence ID:</b>	24	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Oct,23,2012 20:17:56		
<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	<p>DOB 4/24/1945 I am for removing all PWC restrictions on the Pictured Rocks National Lakeshore for the following reasons:</p> <ol style="list-style-type: none"> <li>1. I have seen no compelling evidence or argument for ANY restrictions.</li> <li>2. As a former Michigan public school ecology teacher, I see no evidence of deleterious effects from PWC.</li> <li>3. To single out PWC as a threat to the preservation of the park's resources and/or interference to other permitted uses seems totally arbitrary and without merit.</li> <li>4. To eliminate an entire class of recreational activities is contrary to the gateway community of Munising efforts to bring business to our community.</li> <li>5. PWC have been involved in several rescue missions in the area. They are also being used by lifeguards in Marquette and other areas.</li> </ol>		
<b>Correspondence ID:</b>	25	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Oct,23,2012 00:00:00		
<b>Correspondence Type:</b>	Other		
<b>Correspondence:</b>	Concerned about selective enforcement. Concerned that Bluewater is going after PWC and will eventually go after other boats.		
<b>Correspondence ID:</b>	26	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Oct,23,2012 00:00:00		
<b>Correspondence Type:</b>	Park Form		
<b>Correspondence:</b>	The current regulations work well. I was born in Munising in 1959 and have not heard one complaint on being able to go to the east side of Miners Beach to Sand Point.		
<b>Correspondence ID:</b>	27	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Oct,23,2012 00:00:00		
<b>Correspondence Type:</b>	Park Form		
<b>Correspondence:</b>	PWC are needed in Park because: - Revenue source of multiple options ? kayak or PWC, pontoon, or speed boat, the key to generating revenue is to diversify and give options. - The park is very spread out. A kayaks can't go around the Grand I, in one day, a PWC could do it in 2 hours. A boat will take \$50.00 or more for gas. A PWC can do it with 5 gallons of gas. Time, range, fuel all better with PWC. - Lake Superior is rough water mostly. A PWC can take waves, better than other watercrafts.		
<b>Correspondence ID:</b>	28	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Oct,15,2012 00:00:00		
<b>Correspondence Type:</b>	Letter		
<b>Correspondence:</b>	The City of Munising hereby resolves that it strongly opposes any restrictions on the use of Personal Watercraft, or any other types of vessels, on the water of Lake Superior adjacent to the Pictured Rocks National Lakeshore.		
<b>Correspondence ID:</b>	29	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Oct,24,2012 19:17:35		
<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	Born and raised in Munising, Michigan, I have been blessed with the exceptional privilege of growing up next door to the Pictured Rocks National Lakeshore. Thus I am not approaching from a backdrop of environmental or socioeconomic expertise, but as a local to Alger County who upholds most firm opinions regarding the policies established pertaining to our national preserves. My opinionated presentation is not merely of my own but I vouch for those associated with me whose lives are intimately connected to the Pictured Rocks National Lakeshore and surrounding area, Grand Island and what-not, just as my own life is. Such a majestic area as the Pictured Rocks National Lakeshore is so removed from the ugly world that the		

international attention it has received in regards to the local tourist industry should be of no surprise to anyone. And any local, certainly myself as I have already expressed, should feel blessed and privileged to be so well acquainted with such a utopia.

My promoted emphasis is that locals and tourists alike being so infatuated with the Pictured Rocks National Lakeshore, it is natural that we desire sensual interaction with such heavenly landscape by seeking opportunities as those that will allow us to most personally approach that which we desire. This fact is evident in the selection of cruise ships that traverse the Pictured Rocks National Lakeshore daily and additionally the many pontoons, catamarans and ski boats that maneuver up and down the majestic shoreline.

I am a young man, and the intention of such a statement is that I do not recall when personal watercraft use was unrestricted along the Pictured Rocks National Lakeshore. I am, however, familiar with different opinions concerning why restrictions were set on their use. I've been told that tourists didn't appreciate hearing the loud and obnoxious personal watercraft buzzing about along the shoreline while they were hiking, and so thus restrictions were set to avoid crippling the local tourist industry. I've also been told that restrictions were set because the harsh interaction personal watercraft had with the water along the shoreline was potentially threatening to the Pictured Rocks National Lakeshore; that waves spawning from personal watercraft activity could erode the shoreline and damage it's safety or beauty. Quite frankly, several large Pictured Rocks cruise boats pound up and down the lakeshore every day during the summer, and the waves they create are much more corrosive than the minuscule ripples that a personal watercraft produces. Therefore if personal watercraft are considered a threat, we're obviously playing a game of Tumbling Tower; except that the goal of the game is to knock the tower down and personal watercraft have been disqualified from competing to let the cruise boats have at it. If that is a ridiculous notion, than so is setting restrictions upon personal watercraft for their use being a potential threat. To the contrary, I can understand such complaints as personal watercraft being too noisy for hikers. A possible solution to that issue--if it is indeed a known and significant concern--would be to restrict personal watercraft use along the Pictured Rocks National Lakeshore only during a week or two of the season's most intense tourist traffic, for example around Independence Day. This solution would provide personal watercraft users with fair liberty and pose no threat to the local tourist industry.

These are the concerns regarding personal watercraft use along the Pictured Rocks National Lakeshore that I am familiar with and have addressed to the most adequate of my ability. I am an advocate to unrestrict personal watercraft use along the Pictured Rocks National Lakeshore.

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<b>Correspondence ID:</b>	30	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,25,2012 07:41:53				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I am an avid hiker in the Lake Superior area, I hope that you do not allow these type of water craft for safety and noise pollution reasons. Thanks.				

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<b>Correspondence ID:</b>	31	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,25,2012 00:00:00				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	<ol style="list-style-type: none"><li>1.) I was impressed with professionalism on behave of park personel at munising meeting oct. 23rd 2012.</li><li>2.) I would like to see the total ban lifted on PWC use .... ability to use PRNL in its entirety (from munising to grand marias) 42 miles</li><li>3.) As it exists now, PWC units travel past east end of miners beach, they must stay out 1/4 mile from shore. How can a pwc person go to the bathroom for 35 miles ?</li><li>4.) Additional statement regarding suggestion (3) What if a pwc operator was in paril 1/4 mile offshore in 6ft seas. Without being able to come a-shore. He dies, because of this ban. What are the judicial ramifications/lawsuits regarding a pwc death because they are not allowed to come to shore ? (a huge lawsuit is entitled to pwc rider from PRNL)</li><li>5.) A complete waterway assesment should be completed to cover "ALL" types of watercraft (powered or non-powered) in a umbrella type outline to show all good &amp; bad effects of pollution, noise, visual appearance, lake courtesy, shoreline errosion and other items of importance regarding PRNL Policy's.</li><li>6.) If the parks intentions are to ban PWC use all-together ..... such negative ramifications will obviously dilute respect from local natives on the parks bulling type of jurisdiction. .... as of now ... I personally believe the park has helped the pwc users to enjoy a small portion of the park from sandpoint to miners beach. WE thank-you for that &amp; hope at the very minimum ... PRNL keeps allowing us to use this area for pwc use.</li></ol>				

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- 7.) It is with respect ...I tell other pwc users to tread gently when approaching shorelines of the park & grand island .... slow no-wake speed is the rule when going close to shore.
- 8.) I truly believe that today's jet-skier is more aware of these constraints and my personal vision of such pwc runners, I usually observe & obey current laws regarding PWC use in our Lake Superior area. There are some individuals with reckless disregard, I do not encourage any of these pwc driving habits, as lake respect around other watercraft is paramount.
- 9.) Opening up the entire portion of the PRNL Park to PWC Use, could possibly save a life someday of a boater in distress, a kayaker in big seas, injured hikers, and many other possible life saving ordeals that require a fast/safe jet ski to get there, help out, and get back in a fast and safe manner. There are such cases that a PWC launched from sandpoint could have saved a life.
- 10.) Thank-you for your time & allowing us to use the east end of PRNL for the past seven years. I sincerely hope your decision to allow PWC use in the park continues.

<b>Correspondence ID:</b>	32	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,24,2012 00:00:00				
<b>Correspondence Type:</b>	Park Form				
<b>Correspondence:</b>	We don't need PWC in the park at all! It is incongruous that the polluting, invasive devices are allowed anywhere near our wilderness area. Sensitive special status species don't need to be disturbed nor do human visitors. When PWC start launching in Grand Marais the loons leave. The noisy "roaring around" of PWCs destroys the outdoor experience in my opinion.				
<b>Correspondence ID:</b>	33	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,25,2012 09:29:36				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	hello				
<b>Correspondence ID:</b>	34	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,25,2012 10:27:38				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	<p>I recently attended a meeting regarding "Personal Watercraft Use" for the Pictured Rocks National Lakeshore and want to express my thoughts and ideas with this matter. My husband and I have two children, we live 3 blocks from Lake Superior, and we also own, kayaks, canoes, and a personal watercraft. Year around, we participate in Lake Superior and the surrounding park frequently; we enjoy camping, hiking, swimming, snorkeling, diving, skiing, fishing, and numerous boating activities. We consider ourselves stewards of this wonderful place we call home! I also work for MSU Extension as a nutrition instructor and participate in many activities that teach youth how to be healthy living in this area (Life of Lake Superior youth program, 4-H, Kids R Cooks and Gardeners, just to name a few). I say all of this, to convey that we do not take this issue lightly and that we always consider the impact we make on our environment.</p> <p>The current rules and regulations for Personal Watercraft (PWC) at the Pictured Rocks National Lakeshore are very restrictive and discriminating, so much so that it is very difficult to follow and to have any real enjoyment. Furthermore, there are 3 different regulation areas (all with different rules) that we have to know and follow the rules for: Grand Island, Pictured Rocks Lakeshore, and the Coast-Guard. It is our priority to follow these rules, but we have found it very difficult to do so with so many entities, rules changing frequently, plus motor boat rules and non-motor boat rules to consider as well. We are left with feelings of frustration, isolation, discrimination, and extremely unwelcomed. When discussing these rules with family, friends, and tourists, it usually is with negativism. We love this area and want to speak positively about it. The current PWC regulations are also unjustly discriminating. Motor boats create fuel emissions, Pictured Rocks Cruise boats create fuel emissions, both create huge waves that crash the shore line and potentially endanger wildlife, motor boats are capable of high speeds, both types of boats use the Pictured Rocks Lake Shore all day long during the boating season, and they both make loud noises. The only differences between PWC and other motor boats is that PWC can get closer to the shore line which can potentially disturb nesting waterfowl with waves and noise. Let's not forget that non-motor boats can also get closer to the shore and potentially disturb waterfowl too with noise and contact. With reasonable near shore regulations, PWC can be nearly as quiet and calm as non-motor boats. PWC also make smaller waves than motor boats and much smaller than the Pictured Rocks Boat Cruises that send huge waves crashing into the shore line all day long for 5 months.</p> <p>All water craft have an effect on the natural environment and our experience at the park, let's not unjustly</p>				

single out one craft and over regulate or completely ban it, while others have an equal or greater negative impact. With justified regulations we can all enjoy this natural wonderland!

I propose that regulations address PWC speeds while near the lake shore: requiring PWC to be at "idle" or a range of 1-3 miles per hour within 25 feet of the lake shore.....or something similar, in addition, prohibit wave making close to shore. I would also, be willing to pay a use-fee to have access to all the areas that motor boats have access to. I would be willing to follow all regulations that keep our environment safe and enjoyable as long as it is fair and logical for all watercraft users.

We can all participate in the Pictured Rocks National Lakeshore fairly and responsibly. Thank you for your time and efforts!

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**Correspondence ID:** 35    **Project:** 39835    **Document:** 50079  
**Received:** Oct,25,2012 10:31:39  
**Correspondence Type:** Web Form  
**Correspondence:** We have been to Pictured Rocks area many times and consider it the best place in Michigan. It is a unique place.  
Our opinion on the PWC issue is this: These machines can be used most anywhere and usually are. There are few places you can get away to where you can enjoy the quiet and visual of a great lake without some kind of machine making a lot of noise.  
I realize you have other watercraft there at times and the tour boats but they don't seem as out of place as PWC's. Other than the rental outfits, I don't see any negative impact of completely banning these machines. Why do they have to be in our National Parks? The riders of these should rent a kayak instead or hike or backpack and find out what it is like to experience the area that way.

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**Correspondence ID:** 36    **Project:** 39835    **Document:** 50079  
**Received:** Oct,25,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** This country is overrun with motorized vehicle use of some sort or another. Vehicles penetrate into the far corners of most parks, forests, and other places where nature reigns. I see no good reason why Pictured Rocks National Lake Shore needs to open itself up to indiscriminate use of PWCs just because they exist. There are ample opportunities for people to view the most spectacular portions of the Park using the permitted private vendors and their watercraft. This is an area of spectacular beauty and natural processes. Opening it up to the use of PWCs conflicts with what this coast line is all about - preservation in the way it has historically been over the years. PWCs and their noisy engines will destroy the quiet natural environment, disturb wildlife and people along the shore seeking this environment, cost more to regulate, take additional staff resources or take staff from already employed at some other Lakeshore tasks, facilitate more intense use of the shore by landing PWCs along with damages to resources. As far as I am concerned, the alternatives should be limited to 2 - current use to Miners Beach and no PWC use at all. Thank you for the opportunity to comment.

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**Correspondence ID:** 37    **Project:** 39835    **Document:** 50079  
**Received:** Oct,26,2012 20:52:54  
**Correspondence Type:** Web Form  
**Correspondence:** We feel that PWC's should be allowed in the entire park area on Lake Superior. They are not very noticeable or impactful and there are small amounts of them. Some people have PWC's as their main mode of water transportation and do not have other watercraft to travel with. PWC owners are usually self-reliant as well and do not have to be rescued near as often as the kayakers we read about in the newspapers. Please allow PWC use in the entire park area on Lake Superior. Thank you.

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**Correspondence ID:** 38    **Project:** 39835    **Document:** 50079  
**Received:** Oct,27,2012 10:47:53  
**Correspondence Type:** Web Form  
**Correspondence:** Superintendent, PRNL  
Sir,  
I am in full support of PWC use anywhere on the Lake Superior coast of the PRNL. There is simply no reason to prohibit it.  
PRNL, as well as other national lakeshores and seashores (i.e. Apostle Islands, Sleeping Bear Dunes, Sandy Hook and Cape Hatteras) were established to provide public access to a rapidly private coastline. In other words with much of the shore in private hands, where could the general public recreate? From reading the

administrative histories of the national seashores and lakeshores, full public use was always an important component which included of course boating, fishing and bathing. Jet skis are merely another form of boating. Refusing full use to jet skiers is clearly against the intent of the seashores and lakeshores. In the case of PRNL there are in fact very, very few folks who jet ski in area so denying them access to the full lakeshore is a needless exercise in federal authority. If there isn't a problem, why "fix" it? While not in the scope of the jet ski question it is worth considering banning kayaking due to the many "rescued" from the shore every season.

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**Correspondence ID:** 39    **Project:** 39835    **Document:** 50079  
**Received:** Oct,27,2012 13:55:46  
**Correspondence Type:** Web Form  
**Correspondence:** I am commenting on the PWC issue in Pictured Rocks National Lakeshore. First off, I do not own, nor have I ever owned a PWC. I have a pontoon boat, and I bet that I was on Lake Superior/Pictured Rocks at least 2 days a week the past couple summers. People saying that the PWCs are a nuisance are wrong. Most of the people I witnessed were of middle age and were operating the PWC at slow speeds while along the rocks in the designated area. They are not loud, and I doubt the pollution is even measurable given the new technology in motors nowadays(4-stroke, e-tech motors). The people that I know that use PWCs use them responsibly and are not out to just race around all day. Now I don't know for sure what the exact complaint is against them(I've researched it a bit and was unable to find an exact reason), I've thought of many possibilities being it pollution, wake, noise, and every one of those complaints can be said the same for the fleet of cruise boats that travel out there many times a day that are more of a nuisance than any PWC could possibly be. I understand that the cruise boats are an important part of our local economy, and I'm not against them, but I can't tell you how many times we've had to stop whatever we were doing to make sure our boat is pointed in the right direction when the wake from the cruise boat comes in to avoid damage to my boat and the cloud of black diesel exhaust that follows them around. Even kayakers can be a nuisance. When there is a large group of them, you are focused on where they are to stay a safe distance from them only to find that one or a few are out further than the group and are hard to see. But again, I am not against that either, I enjoy kayaking. I'm sure the same can be said for boats in general also(being a nuisance in some eyes). The point I am trying to make is that no matter what you do, people are still going to be unhappy with what is being done with the park in some shape or form. I ask that you take an honest look at it, and just because some big group like the Bluewater Network that has a lot of backing is going after PWCs in the park, don't let them have their way and intimidate you. I bet if you took a survey on how many of the group have actually visited the park, the numbers would be very low. And if they succeed in banning them from the park, are they going to stop there? Or will they just continue until everything is banned? The PWCs pose no more threat to anything in the park than any other form of travel that is permitted there. Pictured Rocks truly is an amazing place and I am glad that I am able to enjoy it and other places like Grand Island Recreational Area with my boat. Myself and some others push hard to promote this area and I feel that a ban on PWCs will give it somewhat of a black eye. Thank you for time in reading this.

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**Correspondence ID:** 40    **Project:** 39835    **Document:** 50079  
**Received:** Oct,27,2012 18:17:01  
**Correspondence Type:** Web Form  
**Correspondence:** PWC's should be allowed everywhere in the park, they aren't any more disruptive than motorboats, tourboats, and jetboats. PWC operators are respectful of the park, visitors, and the weather. A full ban or partial ban doesn't make sense and would isolate a very important user group from enjoying the park.

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**Correspondence ID:** 41    **Project:** 39835    **Document:** 50079  
**Received:** Oct,27,2012 21:43:41  
**Correspondence Type:** Web Form  
**Correspondence:** While I am not a user of a PWC, I cannot fathom how one can be any more/less destructive than any other type of boats or the natural elements themselves. I do know that there have been a nesting pair of bald eagles on Grand Island who don't seem to be all that bothered by the boat traffic/PWC - they keep nesting there.  
As far as shipwrecks go, the ones I've seen along the PRNL are rather close to shore and have been taking a beating from Mother Nature for years. The shipwreck in Murray's Bay on Grand Island doesn't seem to be negatively affected by all the boat traffic through there, or at least from what I've seen.  
I guess my biggest issue is, you're restricting this particular form of recreation and nothing else. When was the last time someone capsized a PWC and had to have the Coast Guard fly in or the Sheriffs Department

make an emergency run? I'm guessing a helicopter sent to pick up a stranded boater or a hovercraft/boat sent out to help a stranded kayaker may have a more significant effect on the environment than the (probably) occasional PWC who decided to head out to the park - most people I know prefer to hop on a pontoon.

I guess what I'm trying to say is, with the amount of boat traffic already allowed to visit the park, I can't imagine that allowing PWC are going to have more of an impact. The noise from a PWC can't be any more/less distracting than the hum from a diesel engine and the loud speaker on a cruise boat (never mind the wake difference), the radio on a pontoon or other leisure craft or people who drove their car (especially those with no muffler or had their radio up) to enjoy one of beaches with their kids.

The majority of people who use any type of boating as a recreational pastime from this area respect and love the beauty that we have in the Pictures Rocks National Lakeshore. We respect Lake Superior and fear her at the same time. At least a PWC has a better chance of out-running a storm than a kayak.

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**Correspondence ID:** 42    **Project:** 39835    **Document:** 50079  
**Received:** Oct,28,2012 11:34:30  
**Correspondence Type:** Web Form  
**Correspondence:** I believe the number of PWC's are down that use the parks waters. However, I think they should be restricted from use within park boundaries. I do not feel they represent what Pictured Rocks is all about or trying to be. I also think you should require more restrictions on kayakers, there have been far too many rescues that could have been avoided if folks were required to take courses. Also the use of "recreation" kayaks on the Superior shoreline should be limited to within a few hundred yards of Miners Beach. Sea kayaks properly outfitted and paddled by competent paddlers should be able remain unobstructed on the Superior waterway.

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**Correspondence ID:** 43    **Project:** 39835    **Document:** 50079  
**Received:** Oct,28,2012 13:21:40  
**Correspondence Type:** Web Form  
**Correspondence:** I am against allowing PWC in the Park boundaries as they are noisy and will compromise my experiences at PIRO. There is also the potential to interfere with nesting birds both along the shore and cliffs. PWCs should not be allowed to operate within the Park boundaries.

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**Correspondence ID:** 44    **Project:** 39835    **Document:** 50079  
**Received:** Oct,16,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Dear Superintendent:  
I do not feel it is right for the Park to restrict the use of PWC of any kind from traveling on the waters of Lake Superior. We should be able to travel the entire length of the park and use the beach all along the shoreline.  
So, I am for: Allowing PWC use on Lake Superior along the full length of the park (approximately 42 miles) within the park's 0.25-mile jurisdictional boundary. PWC users could land anywhere on the shoreline.

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**Correspondence ID:** 45    **Project:** 39835    **Document:** 50079  
**Received:** Oct,14,2012 00:00:00  
**Correspondence Type:** Fax  
**Correspondence:** October 14, 2012  
I am 100 percent opposed to having PWC's allowed in the boundaries of Pictured Rocks.  
Just as ATV's or snowmobiles aren't allowed in environmentally sensitive areas that could cause damage nor should PWC's be allowed in PRNP. People assume because there on the top of the surface their not causing any harm. Nothing could be farther from the truth.  
I'm an ATV and snowmobile rider and I don't expect to be able to ride in areas that could cause harm on either type of machine. Areas that could be harmed are usually marked and avoided by riders. I don't think that's totally possible for PWC's.

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**Correspondence ID:** 46    **Project:** 39835    **Document:** 50079  
**Received:** Oct,16,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Dear Superintendent,

I am opposed to the use of PWCs in Pictured Rocks National Lakeshore and all other National Parks due to the negative effects on water and air quality and wildlife and especially soundscapes. I will follow your progress on this issue in NPCA magazine.

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**Correspondence ID:** 47    **Project:** 39835    **Document:** 50079  
**Received:** Oct,23,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Dear Mr. Northup,  
I am writing to you about the PWC rules in Pictured Rocks. The mission of the National Park Service states that it "preserves unimpaired the natural and cultural resources and the national park system for the enjoyment, education, and inspiration of this and future generations."  
I believe that personal watercraft deplete the natural resources within the Lakeshore. There are several reasons for this. By using gasoline and oil they contaminate the pristine waters of Lake Superior. The noise and presence of the PWCs infringe on native animals that are foraging and breeding in their habitats. I monitor the endangered piping plovers in Grand Marais. Some of their habitat belongs to Pictured Rocks National Lakeshore. We need to protect this environment that has been so overdeveloped so plovers can continue to nest here.  
I live at the east end of Pictured Rocks National Lakeshore and frequently hike in the park. A few years ago I hiked all the trails within the Lakeshore. The main reason I do this is to enjoy the natural world. The noise from PWC as I approach the Lake is very irritating.

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**Correspondence ID:** 48    **Project:** 39835    **Document:** 50079  
**Received:** Oct,16,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** - I think PWC's should have some emission controls as all boats. - They should not be allowed to be noisy. - They could be restricted to a specified distance from the Pictured Rocks. - They could be allowed to come ashore on sandy beaches where there is no people, at no wake speed. - It would be great if the National Park could be open to everybody. We should not let the few ruin it for everybody.

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**Correspondence ID:** 49    **Project:** 39835    **Document:** 50079  
**Received:** Oct,29,2012 07:20:36  
**Correspondence Type:** Web Form  
**Correspondence:** I would like to write a more detailed comment but can't because I'm at work. I've hiked well over a hundred miles in the Pictured Rocks National Park over the past seven or so years. In that short amount of time I have noticed minor negative changes. I still love it though. Short and sweet on this discussion, the noise factor alone should be enough reason not to make changes to allow personal watercraft to invade the PR Lakeshore. The tour-boats and occasional aircraft are more than enough noise pollution. Who's been to Chapel Beach on a nice day and been amazed at the number of visitors that have come in by foot? Can you imagine the scene if it was opened up to personal watercrafts? Please vote this down.

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**Correspondence ID:** 50    **Project:** 39835    **Document:** 50079  
**Received:** Oct,29,2012 18:45:53  
**Correspondence Type:** Web Form  
**Correspondence:** Use the same techniques at PRNL as used at Grand Canyon to determine rock-face deterioration related to PWCs? Measure the amount and kind of pollutants emitted by the cleanest PWCs and extrapolate to the whole Park? I am in favor of very, very limited motor use in the water--in the whole Park. All motorized vehicles degrade the environment more quickly and un-naturally.  
(It seems to me that, given the strong feelings at the Munising meeting and the inability of several participants to restrain from commenting and follow the agenda, the Superintendent did a great job of running the meeting.)

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**Correspondence ID:** 51    **Project:** 39835    **Document:** 50079  
**Received:** Oct,29,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** I would like to see the ban completely removed. The last 3 summers I have spent considerable time on Lake Superior, from Au Train to Grand Marais. I have been aware of the PWC rules along the PRNL and have watched each and every PWC I have seen on the lake very closely. Not one time did I observe inappropriate or reckless behavior. In fact, this summer (2012) I was happy to see most PWCs were operated by middle

aged and older individuals. I was glad to see them enjoying the lake, and their financial means to purchase new(er) machines and operate them. A new PWC is well over \$10000.

We truly need to get beyond our 'recreational profiling' and focus, within any "sport", on those who are doing wrong.

We have seen substantial increases in kayak related emergencies on Lake Superior. Tourism is on a pleasant, constant up-tick. It is inevitable as more people visit our area we will have enforcement issues to deal with.

Banning a harmless method of enjoying Lake Superior is the wrong way to handle the PWC issue.

I am troubled at the logic behind labeling PWCs as a less-environmentally friendly watercraft than any other vessel. The fleets of pontoons, cruise boats and fishing vessels are unquestionably more damaging than the PWCs. I am troubled by the thought of money being spent on "studies" to quantify such data.

The exact same mechanical technologies in PWCs are utilized in dozens of "permitted" vessels along the PRNL. This loophole alone shows a blatant lack of integrity in the rule. Ban all, or none.

We need to move on. Our Park should be open for all to enjoy.

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<b>Correspondence ID:</b>	52	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,30,2012 05:28:16				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I do believe that would should respect our environment and not abuse or destroy it. But I also believe that would should be able to get out in the environment in order to enjoy it and not just on foot or under the are own power. I do not think motorized vehicles should be ban from any park or forest. My husband is an amputee and this limits him in how much and far he can walk and do other sports. Banning motorized vehicles would not allow people with limitations to enjoy what other people can enjoy. When my husband and I are on trails or water we are there to enjoy it not abuse it and we follow the rules. We would like to continue to do so for many years to come.				

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<b>Correspondence ID:</b>	53	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,30,2012 10:39:22				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	When I first heard about this matter of banning pwc's I was less than thrilled, because we have run our power boat along Pictured Rocks and shown our friends the awesome area...and we have kayaks and stand-up paddleboards and use them a lot. After reading the information I have to say that I think motorized PWCs, such as jet skis and wave runners should be banned from the area. I have taken my family on weeklong backpacking trips along Pictured Rocks and we enjoy the serenity. If pwc owners want to experience Pictured Rocks National Lakeshore then they can hike, kayak it, or boat it like everybody else.				

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<b>Correspondence ID:</b>	54	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,30,2012 17:08:43				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I support any effort to free the Lakeshore, and the waters in and around it, of motorized activity, in this case personal watercraft. If not all of the Lakeshore, perhaps just the Beaver Basin Wilderness at this time. On an unrelated note, I would support any effort to install simple pit latrines in campsites without such facilities as I am finding waste products--including feminine products and diapers--behind trees, on beach margins, etc. No reply necessary, just keep up the good work on our behalf. Thanks You.				

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<b>Correspondence ID:</b>	55	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,31,2012 06:58:38				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	Please don't restrict or ban PWC from Pictured Rocks! PWC are no different from any other boat, if you don't need to ban others you don't need to ban PWC!				

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<b>Correspondence ID:</b>	56	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,31,2012 14:29:53				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	To: Jim Northrop, Superintendent, Pictured Rocks National Seashore Re: Personal Watercraft Use Environmental Assessment Alternative concepts recommended: - First choice: Prohibit PWC use at Pictured Rocks - Second choice:				

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Manage PWC use under the existing special regulation

Compelling reasons for the above recommendation:

The simple truth is that PWC users already have virtually unrestricted access to most of the Great Lakes shore. Their primary need is water, waves, and sunshine. Most PWC users have little or no interest in pristine shorelines, wildlife, quiet, natural scenic beauty, and air/water quality.

In sharp contrast to the interests of PWC users are the majority of Pictured Rocks National Seashore visitors who go there because it is the most spectacular and pristine uninterrupted stretch of accessible natural lakeshore that we have in Michigan. People visit this special place because it is pristine, it has plentiful wildlife (some of it quite rare), it is quiet and peaceful, it has unparalleled natural beauty, and the quality of water and air is especially high. It is a truly inspiring place.

It would be extremely difficult if not impossible to justify the significant diminution or elimination of these rare park resources and values already enjoyed by so many park visitors, simply to give PWC users access to more Great Lakes shore of which they already have a plentiful supply. PWC users have alternatives; park visitors seeking Pictured Rock's uniqueness do not.

Just as John Muir was able to save Yosemite Park from the narrow interests of miners, loggers, and cattlemen, so too must we protect the Pictured Rocks National Seashore from PWC users to help protect its unique natural features and values for this and future generations.

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**Correspondence ID:** 57    **Project:** 39835    **Document:** 50079  
**Received:** Oct,31,2012 14:34:49  
**Correspondence Type:** Web Form  
**Correspondence:** To whom it may concern, I am very unhappy with the rules pertaining to dogs on leashes on the lakeshore trails. You don't allow dogs on leashes on the trails, but you allow hunting dogs run free.If you take your dog with you and keep them leashed,don't let them bother other people and clean up after them,what is the harm.Are travelers suppose to leave them lock in their autos? Some lone hikers take them with them for protection.As far as droppings speading evasive species, hunting dogs,coyotes and wolfs all have the same digestive tracks.

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**Correspondence ID:** 58    **Project:** 39835    **Document:** 50079  
**Received:** Oct,18,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Dear Superintendent Northrup:  
I will be brief. I live in the lower peninsula (Oakland County), so relatively close wilderness experiences that include unspoiled shoreline are in short supply. I was a backpacking visitor to Pictured Rocks a few years ago. As I made my way down the trail I was shocked and dismayed to see and hear personal watercraft so close to shore. I thought to myself, "This can't be legal." Well, I learned that I was wrong. Given the relatively short length of shoreline at Pictured Rocks compared to the entire Lake Superior shoreline, it seems to me that a total ban on PWC within the park boundary is the only sensible approach. It is virtually impossible for any visitor to Michigan to enjoy a Great Lakes shoreline walk without seeing the visual and aural intrusion of humans, whether it's homes or watercraft on the lakeshore. A set aside of the 42 miles of Pictured Rocks shoreline seems to me to be a modest ban for those of us desiring to enjoy nature unmolested by the obnoxious buzz of PWC.  
At a time when political compromise has become anathema, it pains me to conclude that there is no room for compromise on this issue. PWCs have to be banned from the Pictured Rocks shoreline, a precious and unique natural resource that is being despoiled by a handful who have other options to enjoy themselves along Lake Superior's shoreline.

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**Correspondence ID:** 59    **Project:** 39835    **Document:** 50079  
**Received:** Oct,17,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Superintendent,  
In response to your "Scoping/Preliminary Draft Alternatives Brochure" concerning the use of personal watercraft in Pictured Rocks National Lakeshore, I submit the following comments. PWC use at Pictured Rocks should be PROHIBITED because they are detrimental to all the "Project Issues" listed in the brochures: Water Quality, Air Quality, Soundscapes, Wildlife, Special Status Species, Visitor Conflicts and Safety, Backcountry and Wilderness, Park Operations, and Cultural Resources.  
They should also be prohibited as a matter of balance. If the situation in Michigan is similar to that of my state, Wisconsin, motorized traffic is allowed on almost all the 15,000 some lakes. There are few lakes

where a person can be assured of a quiet, natural setting. And PWC's can use most of the remainder of Lake Superior so it seems short-sighted not to protect a small portion of Lake Superior from motorized intrusion. The sooner PWC's are prohibited the easier it will be as shown by Yellowstone National Parks struggle with snowmobiles.

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**Correspondence ID:** 60    **Project:** 39835    **Document:** 50079  
**Received:** Oct,16,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** To who it may concern, my wife and I have ridden our personal watercraft in the Pictured Rocks National Lakeshore many times over the years. We have found it a very enjoyable experience. The sights are breathtaking and the water is amazing. We have often wondered why a boat is allowed to beach for a lunch, swim or sun bathing and PWC have not been allowed to do so. Our watercraft is the latest technology and does not harm the water, air or sound quality of the area. We both feel that this alternative fits best with the area.  
"Allow PWC use on Lake Superior along the full length of the park (approximately 42 miles), within the park's 0.25-mile jurisdictional boundary. PWC users could land anywhere on shoreline."  
Thank you

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**Correspondence ID:** 61    **Project:** 39835    **Document:** 50079  
**Received:** Oct,19,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Dear Sir,  
My husband and I have since 1979 spent part if not all our summer months and occasional fall weeks in the Upper Peninsula at our cabin on Steuben Lake in the Hiawatha Forest. We go to Pictured Rocks several times every year we are there and have hiked the North Country Trail and spent lots of time near Munising at Sand Point and up to Marquette along Rt 28 / 41 and beyond.  
One of the things we treasure about our experiences is the peace and quiet. Our own little lake is suitable only for canoes and rowboats and small motor boats for fishermen and we appreciate that we don't get large motor boats, speed boats nor PWC's. The latter in our opinion, are a nuisance. They are loud, create a terrific wave pattern and make fishing impossible.  
We like seeing the kayaks along Superior south shore and don't mind the excursion boats because they are off shore. We do not think PWC's belong there, either. I admittedly have never ridden on one, but I have observed people being rather reckless and I question their use by children alone.  
We appreciate your asking our input on this matter. If we have a vote, we vote "NO" to PWC's.  
Thank you

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**Correspondence ID:** 62    **Project:** 39835    **Document:** 50079  
**Received:** Oct,17,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Dear Clerk,  
I thank you for writing on what I think of Personal Watercraft use at Pictured Rocks National Lakeshore. I believe we should leave things as is.  
Manage PWC use under the existing special regulation for the park.  
The reason I say that is when I visited Pictured Rocks I never had any troubles with them.  
If you were to prohibit PWC use what's next. To prohibit tour boats because there PA system is too loud.  
I want you to know I don't own a boat or PWC. I have no plans on buying a PWC or boat. Some people just don't like PWC for some reason.  
Please keep my name on the mailing list for PWC use.

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**Correspondence ID:** 63    **Project:** 39835    **Document:** 50079  
**Received:** Oct,17,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Mr. Jim Northup, Superintendent  
PWC Environmental Assessment Comments  
We are responding to the PWC Environmental Assessment flyer sent from Pictured Rocks National Lakeshore. We start with a short introduction about our background to help you better understand how our experiences within the park systems might support our comments. Thank you for including us.  
I have been a user of the Pictured Rocks area as a hiker, camper in front and back country, fisherman,



explorer, and adventurer even before it was a park (about 50 years). I know the Park lands, physical area, and general history very well. There have been many changes to park use, some great ideas and some questionable. My wife Carolyn and I have intimately explored the Park with our boys from shoreline to the interiors most remote locations. We happily volunteered over the years doing back country clean up, trail preservation, and violation reports. We like to think we have helped others know and enjoy the Park better. We also contributed comments and action to the Grand Island recreational design, Rock River management decisions, Big Island lake decisions, and many other smaller management issues over the years. We remain on the forest service public comment mailing list.

Carolyn and I have been involved in the North Country Trail recon and patrols in Lower and Upper Peninsula areas. We worked with the DNR in the 80's and 90's on user issues at parks like the Porkies and Craig Lake. We helped develop trails and management ideas within the Ottawa National forest with management at Kenton, and Rapid River (Indian River) to develop ideas and action to better user experiences. Unauthorized use, trash, unauthorized campsites, and stream crossings were diminishing the experience for others and destroying the resource. In our local Mecosta County we just spearheaded in planning a shared recreational usage of undeveloped land tracts initiating quiet spaces for seniors to walk, ski/snowshoe, or bike.

We have witnessed the consequences of forest management attempts to overlap conflicting user types in a single location. The changes created in enjoyment and for the physical environment were not always beneficial especially when enforcement was not adequately funded or pursued. Other federal park units like McCormick Tract back in the 90's and Big Island Lake recreation area had significant abuses until regulatory common sense was applied. All manner of users wanted to control the units including outfitters and motorized sports however the environment of these units could not sustain such a mix of users.

All this said; we wanted you to know about us and our commitment to preserving the fragile nature of special places. Some places need protection and reservation from those who would diminish its enjoyment or character such as unique place like Pictured Rocks. Some times change brings a lot of unforeseen baggage with it and then the real issues can begin. We truly understand and believe in the premise "you cannot have everyone do everything they want in the same place at the same time and please all of them-nor should we try".

Our comments:

Pictured Rocks National Lakeshore is a uniquely friendly, easily accessible WILDERNESS experience. It can continue to be successful only if we preserve its natural and special environment. Many people have worked hard to preserve it for good reason. Over the years there have been plenty of attempts to undo its special environment from ATV's interior trails to a proposed road right through the heart of it by a past Governor. All these situations were challenging for management but the wilderness prevailed. This request is an attempt by a group of special users to gain special access asking traditional users to compromise their enjoyment once again and potentially suffering the park resources and environment.

In the last couple of years there have been increases of special other user types. (Example: Kayakers have increased and we have personally observed some new ways of circumventing rules along 12 mile beach. (Pets, glass containers on shore, and alcohol, buried trash on the beach. The evidence is the items my wife Carolyn and I have packed out from Beaver Creek, Coves, and Pine Bluff after volunteer trips. Power boaters have also been more aggressive dropping off beach users at remote locations or circumvent back country camp rules including people counts at camps or bringing pets ashore within the wilderness. (We have reported dogs at Pine Bluff coming through the Beaver lake trail from Beaver Lake campers or boaters).

People unaccustomed to back country etiquette are more frequently entering the wilderness areas evidenced by the trash and toilet tissue we cleaned up on the beach and at the Beaver Lake outlet to Beaver Creek in the last two years.

PWC's are popular in our state and not well regulated possibly making enforcement a challenge. On many inland lakes they have been banned because of shoreline destruction, habitat destruction, and nuisance. They can involve alcohol use and operational extremes when riders look for ways to make a ride more "exciting". PWC's are recreational vehicles and not just a transportation vehicle suggesting they should only be used in an area appropriate for them. (Example: skate boards are transportation however they are generally inappropriate on walk ways or vehicular traffic lanes). PWC's can present user danger and possible rescue situations along a potentially dangerous Lake Superior shoreline. They also contribute to emissions and possibly contamination of water along the beach. What would happen to the hiker's drinking water? PWC's have few restrictions on Vt10-10 is riding or what safety training they have had. PWC's could easily run in groups magnifying their disturbance and nuisance.

Inclusion of PWC's would most certainly involve the shoreline drive-in campgrounds like Hurricane River

and 12 Mile Beach. How would this additional access affect parking lots, beach launch sites, erosion, crowds? What happens when a disproportion of camp sites become PWC users as happened with ATV's when Muskellunge Lake state park became an ATV trail depot? (I stopped going there after 20 years because of the "cultural change"). Then there is Beaver Lake 'no motors on Beaver lake back country side but PWC's on the Superior side of interior camp sites? As you know, noise can travel a long way down the shore area. Even 4-stroke engines would be audible on calm days or at night if someone decides to take a moon light run. Currently we clearly hear early or late boaters from the Munising harbor even when they are out a distance. How is this going to be received or enforced when it happens?

One might argue with some common sense how PWC's have most of the Great lakes and multitudes of inland lakes to enjoy. ATV's it miles of trails or roads, why do they need the few last places of pleasant easy access to solitude, for hikers? Why do they deserve to limit what we enjoy just to have more of what they want?

We also ask how you would enforce rules on PWC's when existing enforcement resources cannot stop all the abuses in the Park. How would it diminish existing enforcement resource?

As volunteers, we can attest to a recent change of attitude by some back country users in disregarding rules, noise, and leave no trace ethics. Carolyn and I do what we can to educate on the trail, especially when we find inexperienced people or ill prepared users. We are often in a position to interact with many types of back country users and found most understand their basic responsibility toward the environment but a growing number disregard or disrespect their surroundings.

What we cannot imagine is a future with PWC's beached up and down the pristine coastal area of 12 mile beach or their potential use accessing back country camp areas. These vehicles are a form of recreation and would not sit idle for long at a camp site. Just imagine the off/on beaching, out and back traffic to the water, or back to camp on PWC's from Beaver Creek or Seven Mile much less 12 Mile camp ground. Imagine the beach traffic with PWC's following tour boat wakes or buzzing Kayakers? Imagine the traffic and potential abuse of container rules for anyone using a PWC to access back country camps have the ability to zip into Munising for a night cap or supplies? Imagine the drone of high torque motors over the sound of waves hitting the shore as you try to retire for the night? If not the PWC itself, the user abuse you could create many problems. Imagine a ranger chasing down a violator on a PWC? Isn't this the same as allowing ATV traffic along the trail system and into back country camps?

We think it would be a disaster. This could be the one thing that completely changes the very nature (no pun) how we enjoy this special resource.

We know it's not as simple as it may sound to decide these issues however as the leader of this issue and the next issues to pop up, I employ, you to protect the Park as a hiking sanctuary and not another recreation area to be divided up between users until the overlap finally destroys the original benefit of this special environment.

One additional but important issue as the demographic change:

Pictured Rocks is one of the last places older hiker like us (68yr) can easily, access a real wilderness experience and expect reasonable solitude and beauty in a relatively safe environment for families and seniors alike without the cost of expensive traveling outside of Michigan. Many of the people we meet are new to the Park and compared to other National Parks they consider it the cleanest most peaceful place around. With the increase in "staycation" type of vacationing, it would seem more important to protect the Park from unexpected invasions of PWC's. (Considering the easy access launch site at Sand Harbor). This alone is a reason to continue protecting our rare jewel and have a "PURE MICHIGAN" motivation to bring visitors looking for a special experience to the Park. A place for people of all ages to utilize a back country as pristine to be inside as it looks on the outside.

What else needs to be said?

Pictured Rocks National Lakeshore isn't just another recreation area. It is a unique park in a unique setting, providing an already fragile balance of user access. How far can we go until it's lost? Sometimes saying "No" to some users is saying "Yes" to preservation of the wilderness values of the Park and the Park itself. Please say "no" to this issue. Do not compromise away what we have. Thank you for reading these comments.

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**Correspondence ID:** 64    **Project:** 39835    **Document:** 50079

**Received:** Oct,19,2012 00:00:00

**Correspondence Type:** Letter

**Correspondence:** Sir: I am responding to a request for public comment with respect to PWC's at Pictured Rocks. I do not have a computer, e-mail, a type writer, and my writing is no longer readable. If you cannot decipher this just toss it.

It is probably true that my generation is the last one to know what quiet is. I visited Pictured Rocks many times even before the Lake Shore was there. It was pretty quiet even then with the trailer park. The lady with the shotgun and the kids fishing their lives on the castle with each visit the noise was worse and the quiet less. Most people have no idea how noise travels especially over water but there is more to it than that. Noise is one the great enemies ? a sickness - of our society and the disease. Deafens millions, much of the noise is avoidable if people only desired to make it so. You need to look no further than two motorcycles ? exert the same except one has been quietly made that way.

But there is more than that. There are two great evils to noise ? one defensive and one offensive. The person with noise is using it to say "look, here I am!!" " See me, I am important." It is noise is done on purpose. The other is even more evil ? "Look at me!! Listen to my noise!! Its hurts you, doesn't it?" There is a great selfishness in our society and a disregard for our fellow man so they send their noise and we can only answer with silence ? quiet.

We are fast destroying the nature of our earth and PWC's are just one of many examples ? we don't care. Pictured Rocks is one of the few places where people can go for quiet. There is no reason why the PWC owners cannot experience the rocks for the good feeling for himself and others ? in silence.

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**Correspondence ID:** 65    **Project:** 39835    **Document:** 50079

**Received:** Oct,17,2012 00:00:00

**Correspondence Type:** Letter

**Correspondence:** Dear Superintendent Northup:

We are writing to submit our input for developing an Environmental Assessment (EA) for evaluating personal watercraft (PWC) use at Pictured Rocks National Lakeshore.

We strongly believe that PWC use in the waters of Pictured Rocks is incompatible with the resources and values of the Lakeshore for the reasons we have outlined below.

PWCs are noisy. Sound waves travel greater distances across water, where there are minimal objects to deflect or absorb the waves. Restricting PWC use to a specific area of the Lakeshore will not protect other areas from the sound generated by PWC use. Restriction of hours of operation to control noise levels is extremely difficult to enforce.

PWCs have much greater maneuverability and a shallower draft compared with boats. This means that users can operate close to shore in as little as one foot of water. This use offers the potential to disturb wildlife, including vulnerable aquatic life, cultural resources, and other Lakeshore users. PWCs have a significant potential to impact the water quality of the Lakeshore through oil and gas emissions, disturbance of lake sediments, and through the potential to spread invasive species. Finally, through our personal experience as lake cabin owners in Minnesota, we know that successful enforcement of the rules governing PWC use is nearly impossible. Any attempt at enforcement would require a constant Park Service presence along the shoreline, as well as significant visitor education and outreach programs. Even with these major and costly efforts, successful enforcement is still extremely difficult.

In summation, it is better not to allow this use of the Lakeshore than to develop costly and minimally successful strategies to mitigate the effects of this use. Thank you for consideration of our input. Sincerely,

P.S. We would have submitted these comments at your on-line site: <http://parkplanning.nps.gov/piropwc>, but we were unable to connect to the site. Is it operational?

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**Correspondence ID:** 66    **Project:** 39835    **Document:** 50079

**Received:** Oct,16,2012 00:00:00

**Correspondence Type:** Letter

**Correspondence:** Re: Personal Water Craft Environmental Assessment

1. Water quality will be degraded to some extent, depending on make and number of PWC's on the water. 2. Air quality will be impacted to some extent, for the above reasons also. 3. The soundscape of the park will be most definitely negatively impacted. This may be the single biggest problem with PWC's. 4. The birds will be disturbed by the noise. How badly this will impact nesting and other behavior is beyond my scope of knowledge. I do think the fish and mussels will be impacted to a lesser extent. 5. PWC operators are notoriously insensitive to other users of the surface waters. I firmly believe conflicts will be unavoidably common, and require extra manpower to enforcement park regulations. 6. I am not sure what the impact to cultural resources will be. But, PWC's will allow people access to skin dive or possibly scuba dive, in off shore waters and on ship wrecks unsupervised. 7. The backcountry and wilderness experience could easily be spoiled by the noise.

In my opinion, the area around Grand Island is a better location for PWC operation. The island is a federally designated recreation area that legally allows for a wider range of approved uses than the park.

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**Correspondence ID:** 67    **Project:** 39835    **Document:** 50079  
**Received:** Oct,19,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Superintendent Jim Northup,  
PWC cannot belong in any area considered wilderness. As a camper and hiker at the Lakeshore for almost twenty years, I know the experience is ruined by the sight and noise created not to mention the impact it has on wildlife in the park, which really adds to the experience of nature. We come to the forest for solitude and peace.  
So much of the rest of the state is available for PWC; please do not allow our last few vestiges of nature be destroyed. With the Park now so accessible, without limitations the Park, as we know it, could be destroyed in a few short years. We do not need another amusement or water park.  
Therefore, I am for gunning PWC use within the park. Thank you for the opportunity to voice my concern.

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**Correspondence ID:** 68    **Project:** 39835    **Document:** 50079  
**Received:** Nov,01,2012 10:25:03  
**Correspondence Type:** Web Form  
**Correspondence:** I believe that PWCs impact environmentally quality by interfering with animal habitat and breeding. I also believe that gas and oil from PWCs degrades the quality of Lake Superior. People come to Pictured Rocks to experience a quiet natural area. The noise from PWCs impacts their adventures. The mission of the National Park service is to preserve the natural environmet. There are fewer and fewer places to do this. We must preserve Pictured Rocks National Lakeshore.

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**Correspondence ID:** 69    **Project:** 39835    **Document:** 50079  
**Received:** Nov,01,2012 17:21:53  
**Correspondence Type:** Web Form  
**Correspondence:** I believe that personal watercraft should be forbidden in Pictured Rocks because there is no reasonable way to control them to particular areas if they are allowed to be used in specified areas.

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**Correspondence ID:** 70    **Project:** 39835    **Document:** 50079  
**Received:** Nov,01,2012 20:35:52  
**Correspondence Type:** Web Form  
**Correspondence:** Dear Sir or Madame,  
I recently became aware of an evaluation the National Park Service is conducting of the impact of personal watercraft at Pictured Rocks National Lakeshore in Michigan.  
My concerns are several, not the least of which is the singling out of personal watercraft only for the purposes of the study. As a user of all types of watercraft for over 20 years, including canoes, kayaks and motor boats as well as personal water crafts, I am of the firm belief that personal watercraft are the recipient of much undeserved bad publicity. From personal experience I can attest that the wake of a motor boat is much greater than than of a personal watercraft. I've had both a canoe and a 20 foot boat almost swamped by the wakes of other motor boats - something that would be impossible from a personal watercraft. If a study needs to be conducted, by rights it should include all vessels that may have an impact in the area. To ban or limit personal watercraft without also including larger vessels that have a much greater impact on their surroundings is discrimination against personal watercraft.  
A few years ago a marine life research study the state of Nebraska used personal watercraft exclusively to collect samples. Personal watercraft were chosen over motor boats for use in the study soley because they had LESS impact on marine life and marine environment than traditional motor boats and allowed for more ease of use than canoes or kayaks. The personal watercraft allowed researchers to approach nesting sites more quietly and allowed the collection of samples in shallow areas, without the danger that the larger wake a traditional motor boat would have had. In light of uses as this one, how can personal watercraft be said to cause more damage to the environment?  
Also of consideration is that personal watercraft are used by coastal search and rescue and life guards because of they are safer than using traditional boats closer to shore (no propeller to injure a distressed swimmer and closer to the water for recovery).  
I strongly disagree that a personal watercraft has a greater impact on the environment that a traditional motorized vessel. If a study has been recommended for the impact of personal watercraft at Pictured Rocks

National Lakeshore, the study should also include the impact traditional motorized boats. To imply that a personal watercraft alone would damage the environment more than larger propeller driven vessels is uninformed, misguided, and discriminatory.  
Thank you for your consideration.

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**Correspondence ID:** 71    **Project:** 39835    **Document:** 50079  
**Received:** Nov,02,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** Pwc's should be allowed for the full extent of the national lakeshore. Pwc's are one of the best platforms for rescuing kayaks ,swimmers and pontoons in distress. Pwc's are as quite as boats and pontoons and should not be discriminated against. Emissions are minimal and are no different 1/4mile off shore as on shore. I do not own or rent a Pwc but utilize the lakeshore as a hiker and a boater with scuba diving charters inside the lakeshore. We have never had problems or rescues of Pwc's with our glass bottom boats or dive charters. I find it personally disturbing that one group of users want to outlaw another group from enjoying our national lakeshore.

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**Correspondence ID:** 72    **Project:** 39835    **Document:** 50079  
**Received:** Nov,02,2012 11:44:43  
**Correspondence Type:** Web Form  
**Correspondence:** Thank you for your publication, "Personal Watercraft Use Environmental Assessment." We have been summer residents in the Hiawatha National Forest since 1965, and have enjoyed the Pictured Rocks National Lakeshore.  
We are definitely in favor of the alternative which would ban the use of PWC everywhere within the park for all of the concerns listed in your publication under "Project Issues." Although unfortunate for shoreline residents, there are plenty unregulated areas of Lake Superior available for use of PWC, but the National Park should NOT be one of them. The Park should serve a higher purpose than as a playground for environmentally degrading activity of thrill seekers.  
Please protect this precious resource. Thank you,

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**Correspondence ID:** 73    **Project:** 39835    **Document:** 50079  
**Received:** Nov,02,2012 11:50:16  
**Correspondence Type:** Web Form  
**Correspondence:** I am opposed to the admission of personal water craft within the boundaries of the national lake shore. I believe that the use of such craft should be prohibited at all times. The use of such craft is inconsistent with other established uses in the park as defined in the management plan. The potential and likely dangers to air, water and general esthetic elements of the park are significant and negative impact on wildlife is also likely. I believe there is no necessary use for these craft within the park boundaries that cannot be satisfied in other less sensitive locations.

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**Correspondence ID:** 74    **Project:** 39835    **Document:** 50079  
**Received:** Nov,03,2012 08:30:07  
**Correspondence Type:** Web Form  
**Correspondence:** I support allowing PWC use at Pictured Rocks.  
Owning both a boat (19' Glastron 1990-120hp outboard) and a PWC (2012 Yamaha FX HO 180hp), the project issues make no sense to me. Why are PWCs singled out? All the identified issues apply to all motor powered watercraft, not just PWCs. My boat motor (2-stroke) discharges more gas and oil and exhaust into the water and air than my PWC. My boat operates much louder than my PWC. My boat displaces much more water creating a much larger wake that crashes the shoreline. I also feel safer on my PWC than in my boat (or in my kayak) when the waves suddenly pick up on Lake Superior. The identified issues are not against PWCs, but against obnoxious operators of watercraft that do not respect other boaters, wildlife or environment. And they operate both boats and PWCs.  
I do support restricting use to only those with 4-stroke engines. Having owned both a 2-stroke and a 4-stroke watercraft, the 4-stroke is much quieter and more environmentally friendly. I think that is the real issue...to protect the wildlife, environment, and tranquility of this serene area. Thank you.

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**Correspondence ID:** 75    **Project:** 39835    **Document:** 50079  
**Received:** Nov,03,2012 12:57:57  
**Correspondence Type:** Web Form

**Correspondence:** I and my wife find the PWC to be very invasive of the serenity and beauty of the Pictured Rocks National Lakeshore. The noise, odor and visual distractions caused by pwcs in the park overwhelm the beauty, peace and delicacy of the lakeshore. We would prefer the park ban use of all motorized watercraft within 500' of the shoreline.

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**Correspondence ID:** 76    **Project:** 39835    **Document:** 50079  
**Received:** Nov,03,2012 15:56:08  
**Correspondence Type:** Web Form  
**Correspondence:** Personal Watercraft Issue: Pictured Rocks National Lakeshore  
"Natural Quiet" is a precious resource of Pictured Rocks National Lakeshore, and it is important to protect it. We simply must continue to provide some places in this cacophony of modern life where one can experience solitude, peace, and the precious quiet of natural sounds. The concept that natural quiet is an important resource that needs to be protected has been validated in other national parks such as the Grand Canyon with the regulation of over flights.  
I personally treasure that natural quiet and have had that quiet shattered by the loud and shrill whine of PWC's on so many occasions in the park while kayaking, hiking, and just enjoying the park overlooks and beaches.  
I have also felt threatened by PWC's on several occasions while swimming and kayaking. I have abandoned my plans for swimming workouts a few times because of feeling unsafe due to the presence of PWC's. Although most operators may be very responsible in their use, I have had the unfortunate experience of having some approach me at high speed while swimming and kayaking, sometimes circling around me in my kayak creating an unsafe situation. I feel that they are often operated at such high speeds that it is quite possible that they might not see a swimmer in the water.  
While an argument could be made that there are many other types of boats allowed in the park, including the cruise ships, the noise level of those other types of boats simply is not as loud and shrill. They also do not operate at the high speeds of the PWCs and I have never felt threatened by their presence. The cruise boats are always very careful to give kayakers a wide berth, and I have never had a problem with other boaters creating unsafe conditions or making the kind of noise that simply shatters the quiet.  
Pictured Rocks National Lakeshore is only a very small portion of the Lake Superior shoreline. There is ample room on the lake for their use outside of the national park.  
Please consider the values of those who strongly desire a respite from the noise of everyday life, and like me, treasure the opportunity to find peace and refresh spirits within a national park where natural quiet is protected.

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**Correspondence ID:** 77    **Project:** 39835    **Document:** 50079  
**Received:** Nov,04,2012 08:13:14  
**Correspondence Type:** Web Form  
**Correspondence:** We believe PWC are antithetical to siteseeing both for the rider and other persons in the area. They are a high speed, noisy craft enjoyed for jumping waves and racing in circles. While probably a lot of fun, they are extremely annoying to people on shore, dangerous for anyone swimming and generally provide only visual and auditory noise pollution for anyone that is not the rider. We are concerned as well about the environmental effect of gas and oil emission, sound emission and exhaust smells. We are also concerned it will disturb wildlife and all the other park visitors who wish to experience a quite visit of a beautiful scenic area.  
Personal watercraft drove B.T.'s parents away from their beloved lakefront home. They are as jarring an intrusion into a park experience, whether woodland or waterfront, as are ATVs and snowmobiles.  
We believe the general management plan should prohibit PWC use in the boundries of the Pictured Rocks National Park.  
Thank you for allowing our input.

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**Correspondence ID:** 78    **Project:** 39835    **Document:** 50079  
**Received:** Nov,04,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** November 3, 2012  
Dear Superintendent Northup, I write on behalf of the City of Munising to reiterate this community's opposition to any restriction on personal watercraft, or any other type of power vessel, to and through the navigable waters of Lake Superior adjacent to the Pictured Rocks National Lakeshore. My reasons are several. First of all, it is unnecessary. The Pictured Rocks are best seen from the water, but however

popular, there is still no vessel congestion in these waters. We live in a boating community and I spend a great deal of time on the water from May to October. PWCs gained some popularity in and around Munising 10-15 years ago, but that popularity has waned. They are almost rare now and they prefer the flat waters of the bay. Displacing them in quantity are pontoon boats and kayaks. This is obvious from even casual observations. Every time the Park Service restricts an activity in the park it has a negative impact on the local tourism industry. Even if it does not directly impact any one segment of visitors, it creates negative publicity for the park and its gateway communities. Finally, trying to study the impact of PWCs on the park using the ten criteria to be measured is not possible without also studying the impact of other vessels using those same criteria. How can you make any objective and logical determination on the impact of PWCs on air quality, or water quality, without measuring the impact from other types of vessels? It's like trying to determine the impact of automobile traffic on a neighborhood by looking at the impact of only Ford model cars, or of only motorcycles. I cannot be done objectively or fairly and any conclusion reached on any of the ten criteria to be measured, regardless of the outcome, will be immediately challengeable.

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**Correspondence ID:** 79    **Project:** 39835    **Document:** 50079  
**Received:** Nov,04,2012 16:30:07  
**Correspondence Type:** Web Form  
**Correspondence:** Our Family has owned a PWC since 2004 and have enjoyed the shoreline of Lake Superior for many years. We also enjoy Lake Superior with a 22.5' Sea Nymph that is used for both fishing and pleasure. We like to travel together when using both the boat and the PWC. We have updated to a 4 stroke engine and feel that the noise from the PWC is less than what the boat emits. It is unfair to say that they emit gas an oil that affects the water when other watercraft operate with the same fuel. We also feel that is is unfair to single out PWC as a threat to wildlife species when the use of other boats (even large cruise boats) is allowed in the same area of concern. Kayak users are traveling the shoreline getting even closer to the said inhabitants and yet they are not considered a threat. We agree that there should be rules (for all users) and that they need to be followed. We do not agree that PWC should be singled out as a concern and no other watercraft (cruise boats to kayaks) are.

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**Correspondence ID:** 80    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 11:42:17  
**Correspondence Type:** Web Form  
**Correspondence:** My preference would be no PWC in the park, or at least none in the park waters beyond where shoreline settlements occur (e.g. Sand Point areas). I do not think that these vehicles contribute to mission based use of the park. While I do not generally like the PWC in the park, I think that IF you decide to continue to allow them, the current allowance area is best. Expanding this area would be impactful to the ecosystems and would impact visitor appreciation because of the noise associated with the PWC. I have spent substantial time at the lakeshore and one of its most valuable resources is its quiet, undisturbed setting. At Mosquito, you can hear the tour boats a substantial distance inland (0.5mi and more, depending on conditions) and I suspect that PWC noise would also travel inland because of its frequency. Further, I think that allowing PWC to move beyond Miners would be a risk to their operators' safety. Having spent time on the water, I am aware that there are relatively few put in locations between Miners and the beginning of the beach east of Mosquito on a lake that is highly changeable. This is a concern for all watercraft, but is particularly difficult for PWC because they are to large to easily pull up on rocks (like a kayak). From an ecosystem perspective, the noise and disturbance is a problem for birds and I also have some concerns about the amount of fluids released from PWC, particularly since there are limited put in locations (at least in some areas) which might concentrate users and their effluent.  
Overall, I would prefer to see a more restrictive, rather than less, usage of PIRO by PWC. If they are allowed, I think they should remain restricted to west of Miners. I also think there should be a requirement of 4 stroke engines to try to minimize chemical pollution and, perhaps, noise. I would also suggest consideration of a "season" where PWC would only be allowed from Memorial Day through Labor Day to try to limit their users' exposure to harsh lake conditions.

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**Correspondence ID:** 81    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 12:33:06  
**Correspondence Type:** Web Form  
**Correspondence:** I strongly support either a ban on PWC use within Pictured Rocks or, at most, PWC use as designated under the existing special regulation. The interior of Pictured Rocks currently provides a high-quality backcountry experience which would be negatively affected by the intrusion of PWCs.

In his classic book *Desert Solitaire*, Edward Abbey noted that the total number of users is less important than the speed and decibel level of users. To paraphrase Abbey, space which one hundred hikers or canoers can inhabit without intruding upon each others' solitude and satisfaction may support only only tenth that number of noisy, speeding motorized playthings before the character of the experience is irrevocably compromised.

Lake Superior has plenty of other space for the motorized set to enjoy, and it is their privilege to use those spaces. There must be one place left in the world where the rest of us can breathe.

I also am concerned about adverse impacts to water and air quality, wildlife, and cultural sites within the park. Even if only a handful of PWC operators are bad actors, is there really enough money to police and protect the lakeshore from that handful in view of the diminishing budgets allotted to our park system?

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**Correspondence ID:** 82    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 12:38:33  
**Correspondence Type:** Web Form  
**Correspondence:** Michigan is blessed with many areas open to personal watercraft (motorized), the most shoreline in the contiguous 48 states, in that regard asking PRNL to be of the silent sports only, is not to be considered at all restrictive. It is the fact that someone in authority has said no, that it becomes attractive to the few, who feels restrictions of any sort invade their personal rights.

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**Correspondence ID:** 83    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 12:43:51  
**Correspondence Type:** Web Form  
**Correspondence:** As a park volunteer I feel it's extremely important to keep personal watercraft away from Picture Rocks National Lakeshore. Our section of trail is in a designated wilderness area and we would find it extremely disconcerting to hear the whine of personal water craft just feet from the cliffs.  
There are many opportunities for people to use their personal water crafts adjacent to the part.

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**Correspondence ID:** 84    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 15:55:04  
**Correspondence Type:** Web Form  
**Correspondence:** Seakayaking is my mode of choice to experience the beauty of the Lakeshore's waters, on the inland lakes and rivers as well as along the "Big Lake". I have kayaked the waters of Pictured Rocks National Lakeshore since the summer of 1998 through August 2012. In 2001 I purchased a home, relocating almost 400 miles, in a small village west of the Lakeshore in large part because of the close proximity of access to the kayaking at Pictured Rocks National Lakeshore. Since 2007 my husband and I travel over 1600 miles from New Mexico each summer to kayak the shores of Lake Superior. In a seakayak I can approach the cliffs and beaches of Lake Superior quietly, even serenely, and depart leaving only traces of my bow in the sand, traces that are quickly erased by the wind and waves. I am not alone in my passion for this quiet, self-propelled experience as is evidenced by the numbers of brightly colored kayaks and churning paddles that can be seen along the cliffs, beaches and arches in Picture Rock National Lakeshore from spring into late fall.  
I have paddled this area when PWC were allowed and when they were banned. I participated in the Public Review and Comment on the EA that was initiated by then Superintendent Karen Gustin as well as the Comment sessions in late 2004 and early 2005 on the "Pictured Rocks Rule". Although Alternative B had been amended to reduce the PWC area to eight miles of the Lakeshore my concerns about PWC use in the Lakeshore remained unchanged. My knowledge that the PWC rules are not being followed is first hand. I ask the same question as the Court: "Why has NPS issued Rules allowing jetski use in two beautiful and pristine national parks, acknowledging that such use will impact, to varying degrees, water quality, air quality, wildlife, animal habitats, soundscapes, visitor use and safety, etc., when the users of jetskis are perfectly free to enjoy their vehicles in other, equally accessible areas, without threatening the serenity, the tranquility--indeed, the majesty-of these two national treasures?" Especially in light of the ban of PWC in all National Parks except PIRO and GUIIS.  
As I read the PWC Decision document I became aware that a fundamental element has been missing in the information provided and that is information regarding experiences and encounters between kayakers and jetskiers.  
I have never kayaked on Lake Superior without the concern of an encounter with jetskiers!  
The most common encounter is always the incredible noise. You can hear "them coming" long before you can see them. Okay for the sake of other visitors enjoying the park, let the sanctity of the nature's peace and



quiet be abandon. But, what about concern for my safety? As a kayaker, good paddling skills and equipment are a must on Lake Superior and that includes the ability to stay upright and in the kayak. Waves, and more specifically, confused waves, coming from several directions at once, can cause a capsizes. In the waters of Lake Superior, even in the height of summer, a kayaker out of their boat in the water can be in trouble. Jetskiers like waves. Jetskiers like to create waves. These waves can and do cause problems for kayakers, especially novice paddlers which comprise the majority of the paddlers in the groups that are taken out by the kayak tour companies. I have observed jetskis in operation in close proximity to kayakers in PIRO. As soon as I hear one I get afraid they will come too close to me and I won't be able to control my kayak and stay safely in my boat. This is not right! I typically paddle from 25 to 50 yards from shore or cliffs. If I have experienced concerns at this distance from shore then the jetskiers are definitely within the 200 yard boundary established in the Pictured Rocks Rule on PWC. I have also observed jetskis landing and taking off from beach areas from Miners Beach and Chapel Beach with swimmers and kayakers within several yards. And let me tell you, they create wakes!

I really don't have to ask "why", as the Court did, I know the reason PWCs are allowed in PIRO while banned in all but one other National Park and I understand the desire to maintain, or perhaps attempt to reestablish, good relations with the gateway communities of our national parks. But, on this issue I feel strongly that the consideration of one category of visitor's use, has trumped all other users and issues of impact. There is more going on out there than is has observed by the park service staff and all PWC impact issues need to reviewed.

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**Correspondence ID:** 85    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 16:51:55  
**Correspondence Type:** Web Form  
**Correspondence:** All of the criteria listed as negative impacts of pwc can also be attributed to snowmobile use. Therefore, to be consistent, either allow both, or disallow both. I would favor the latter, although that doesn't have a snowball's chance in hell of happening.

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**Correspondence ID:** 86    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 17:24:01  
**Correspondence Type:** Web Form  
**Correspondence:** I have no objection to motor powered craft in surface waters of Lake Superior within the park as long as they are quiet (< 50 db at 10 meters) and are powered by a 4 stroke engine(s) that meets appropriate federal emission standards. Boats powered by electricity or sail would only be required to meet the noise standard. This would apply to all water craft not just personal water craft.

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**Correspondence ID:** 87    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 18:07:44  
**Correspondence Type:** Web Form  
**Correspondence:** I believe that this restriction would be detrimental to our county's tourism. I think people should have the opportunity to see Pictured Rocks without having to take the boat tours.

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**Correspondence ID:** 88    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 18:09:34  
**Correspondence Type:** Web Form  
**Correspondence:** I am writing this letter to express my deep concern and opposition in allowing the use of PWC's on the Pictured Rocks National Lake shore. I have been a visitor of this National reserve for the last 20 years and have witnessed changes for the worse over time with the increased numbers of human traffic. It is a choice that we all have, to leave the comfort of our controlled environments to experience the peace and serenity that our protected lands have to offer. Since the paving and modernization of the Pictured Rocks National Lake shore, it seems as though the mindset of unlimited and easy access to these areas has superseded the very reason we have labeled them sacred in the first place. The intent of the National Park Service is to make Pictured Rocks as accessible as possible for everyone and looks to be driven by the perceived income that may be realized as a result of this access. A national preserve should not be treated as a shopping mall to be advertised and exploited as a commodity. With regards to the PWC ban lift, it is the increase in human traffic and NOISE that is the biggest offender of the access. It is completely unacceptable to have to listen to numerous PWC's screaming up and down the lake shore after having made the sacrifice of walking so many miles to experience the peace and quiet that the original intent of the preserve had to offer. The tour boat(s) and recreational boats are bad enough, and in my opinion, should also be banned from touring this

vista from such a close vantage point. PWC's have NO right to be accessing pristine and naturally quiet areas of our world that has been deemed sacred for the purpose of the "pure" outdoors. Michigan has 3,288 miles of lake shore. 3,238 can remain accessible by PWC's. It is a selfish expectation that we, as humans, feel that we are entitled to disrespect the natural inhabitants of the wild, without constraints. It would be a tragedy to have these PWC's cutting into the silence and beauty of Pictured Rocks. I have every right to enjoy this land as it has always been, not for what some feel the way it should be. Where does it end?

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<b>Correspondence ID:</b>	89	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,05,2012 18:48:36				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	To all whom it concerns: Though I have only just discovered the great natural beauty of Pictured Rocks National Lakeshore, I intend to bring my family back to enjoy the splendor for many summers to come. While I have enjoyed riding PWC's in the past, I believe it would be a huge mistake to allow them at this location. There are not many beaches in this great state that are unspoiled by noise and chemical pollutants. We want to protect not only the lakeshore but also the enjoyment and safety of the people who love it. Kayaks and motor vehicles together creates a recipe for danger. We must make sure we have sufficient rescue personnel in place if we are to allow these types of vehicles. Further, for those who cannot enjoy the lakeshore by hiking or kayaking, there are already plenty of charter boats available. Please don't spoil the experience for us by allowing personal watercraft vehicles. Thank you.				

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<b>Correspondence ID:</b>	90	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,05,2012 18:48:45				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	The peace and calm that can be found along the shores of lake Superior within the park's boundaries are part of the treasure that led to the establishment of this place. In recent years the tour boats have reduced their speed and thus the noise. I noticed the reduction of noise immediately. The noise from personal water crafts is an obnoxious and imposing threat to my experience while hiking the Lakeshore trails. Were they to have quiet engines, I might reconsider. I feel that there are plenty of alternatives for these types of crafts and that the shoreline along a National Park is not the place for thrill seeking of this nature. I hike the trails of PIRO on a regular basis year around. The quiet is an important aspect of what makes this park a refreshing retreat.				

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<b>Correspondence ID:</b>	91	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,05,2012 19:19:22				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I support prohibiting PWC use anywhere at Pictured Rocks. My husband and I have backpacked the length of the park. Our wilderness experience would be compromised by the noise of PWC. There are not many places one can go to find peace and quiet. This national park should be a place of serenity, a place to hear birds and other wildlife, the wind blowing and the waves lapping on the shore, a place to rejuvenate one's spirit. How can this be accomplished with the annoying sound of PWC, what I call the "mosquitoes of the lake" in my ears? PWC have most of the rest of the lake for their enjoyment. This small stretch should be protected not only from their sound, but for the sake of wildlife, and for cleaner air and water.				

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<b>Correspondence ID:</b>	92	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,05,2012 19:27:58				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I support prohibiting PWC use at Pictured Rocks. The noise from the PWCs carries a long distance across the lake which makes for a less than wilderness experience when one hikes along the North Country Trail. There are very few accessible areas along the Great Lakes for backpacking where PWCs are not allowed. This small section of Great Lakes shoreline should be reserved for the sounds of the wild.				

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<b>Correspondence ID:</b>	93	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,05,2012 19:33:55				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I vote NO to the proposal of allowing Personal Watercraft in areas closer than 1/4 mile from the lakeshore of Pictured Rocks east of Miners Beach. I am a user of Pictured Rocks in the area in question and I enjoy this area inpart because it is quiet. I strongly feel it would detract from the natural beauty and the feeling of				

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peacefulness and serenity. I personally would ask that consideration be given to those of us using the park for quiet water sports. My experience with personal watercraft has not always been favorable as most are driven by younger individuals that enjoy speed and can be reckless around kayakers. Pictured Rocks is already inherently dangerous enough without adding another element of danger to the shoreline waters. Thank you

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**Correspondence ID:** 94    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 19:49:15  
**Correspondence Type:** Web Form  
**Correspondence:** I had many peaceful days of hiking along the Pictured Rocks Shoreline before the days of PWC. It is a unique, natural place that many people worked hard to protect. As the park was being created, no one envisioned the dirty, disruptive impact of PWC. I feel extremely fortunate to have had many quiet outings all along the Pictured Rocks National Lakeshore, both before and since it became a National Park. Although I have traveled to other wonderful places in various parts of the world, I have never found any place more beautiful, pristine, and inviting. My family owns a cabin south of Munising. We continue to spend time in the Upper Peninsula and we visit the Lakeshore regularly.  
Please make the decision not to allow any PWC use along the shoreline of the Pictured Rocks National Lakeshore, or anywhere within the park! Their use disrupts the experience of a powerful, natural place. How can visitors savor the beauty of nature when the noise of these engines dominates the sound space? Furthermore, the activities of wildlife, especially waterfowl, are disturbed by PWC. Air and water pollution also result from their use. Safety of paddlers, as well as the PWC drivers and riders, is at risk. I believe the best solution is to disallow any PWC anywhere in the park.

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**Correspondence ID:** 95    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** I frequent Pictured rocks in all season. I spend alot of time hiking the shore and picking up garbage. It is a far more peaceful place without the engine noise and smell from motor boats and personal watercraft. Every summer we sit about Spray falls and watch personal watercrafters take runs under the falls which is illegal. I agree that a ban within the boundries previously stated of personal watercraft is not enough. You can hear and smell their engines far in the distance. All watercraft that is non-emergency should be kept at least a mile from shore to preserve the wilderness aspect of this beautiful National Shoreline. Four stroke engines only reduce pollution but still pollute and are noisy. Canoes, row boats and kayaks (self propelled watercraft) should only be allowed. With special-use permission, people with limitations can apply for special permitted motor boat activity if they cannot use self-propelled watercraft.  
Thank you for these considerations

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**Correspondence ID:** 96    **Project:** 39835    **Document:** 50079  
**Received:** Nov,05,2012 21:16:54  
**Correspondence Type:** Web Form  
**Correspondence:** I think that protecting and preserving our natural resources is very important. I also think it is important to have areas that are free from motorized vehicles for those desiring a more natural and serene experience. However, I don't think that it is right to discriminate against personal watercraft and personal watercraft users and families. To me the Scoping/Preliminary Draft Alternatives Brochure seems to be outdated and have a heavy anti PWC bias.  
How is a personal watercraft going to impact underwater ship wrecks any more than any other type of boat? I can't say with certainty, but I would guess that a kayaker's paddle could be extended deeper in the water than the normal draft of a PWC hull. Boat engines can discharge oil and gas emissions into the water just as well as PWC engines. Boat engines, car engines and motorcycle engines can emit hydrocarbons, nitrogen oxide, and carbon monoxide which are known to impact air quality just as well as PWC engines. The same argument can be made for the noise of cars, motorcycles and boats disturbing the wildlife serenity of the park.  
Today's personal watercraft are among the quietest, most efficient and cleanest watercraft available today. If it is "determined" that personal watercraft are detrimental to the park and should be banned then I believe that all motorized boats should be banned. The argument could be made that all motorized vehicles including cars and motorcycles should be banned to "protect" the park. However, that would most likely reduce the number of people that are able to enjoy the park and to me that seems counter productive. As someone that has explored waterways, lakes and oceans by PWC in many states I believe that personal

watercraft can be one of the best not to mention cleanest, quietest and least disruptive ways to experience our natural resources.

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<b>Correspondence ID:</b>	97	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,06,2012 07:38:37				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	Please, please, please do not expand the use of PWCs within the Pictured Rocks National Lake Shore.				

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<b>Correspondence ID:</b>	98	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,06,2012 08:52:12				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I am very much in favor of allowing PWC to continue using PRNL as they have been the last few years. I do not own one but do have a larger boat and I have not seen or heard of any conflicts.				

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<b>Correspondence ID:</b>	99	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,06,2012 10:09:23				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	<p>Hi, I am a sea kayaker and a hiker. I love the outdoors, being in nature and seeing it from different angles that most people can't or won't do. The solitude is an amazing experience and paddling along Pictured Rocks for the first time this summer was something I will never forget. I firmly believe that the tour boats are enough. Allowing jet skis access would adversely effect the shoreline. The last thing I want to hear when out there is the engine noise when I am trying to enjoy the park. Most people who use jet skis just want to go fast, without much concern for anything but their own fun. Don't get me wrong, they are fun to ride, but the place to ride them is not along Pictured Rocks. As a kayaker who might be paddling along the shore, I don't need to have one of these zooming by me, creating a loud echo off the cliffs, extra waves or gas fumes to suck down.</p> <p>I think the current options of tour boats, personal watercraft, kayaks and tours that bring the kayak to the area are more than enough options for visitors to enjoy the shoreline. The sole purpose of a jet ski is to go fast and have fun, not as a slow cruising vessel to tour a coastline. I really don't see any good points to allowing them access to Pictured Rocks.</p>				

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<b>Correspondence ID:</b>	100	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,06,2012 10:22:02				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	There are too many waterways being invaded by noisemaking machines and we need places like this to be able to appreciate nature without all the noise..please do not allow jetski access to this waterway....				

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<b>Correspondence ID:</b>	101	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,06,2012 10:32:49				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	<p>I am an avid kayaker and occasional backpacker. Pictured Rocks is one of my favorite places to kayak or backpack. I own a powerboat, and have owned wave runners (similar to a JetSki).</p> <p>I am in favor of keeping Pictured Rocks JetSki free. They tend to be loud and the sound carries over long distances, which detracts from the beauty of the park.</p> <p>As I kayaker, almost all conflicts I have had with other watercraft have been with JetSki's.</p>				

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<b>Correspondence ID:</b>	102	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,06,2012 10:36:40				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	The Pictured Rocks Lakeshore is not only a place or something pretty to look at, but an experience of nature. This experience can be had from the land and from the water. There are currently many ways to enjoy the Pictured Rocks from the water -- kayak and canoe, tour boats, other personal motorized watercraft. All of these vehicles leave their mark, be it from noise, pollution from fumes and fuels, or simply just being there. However, I feel that jet skis are in another, more detrimental class. They are noisier and smellier than these other watercraft. Jet skis are designed for, and used for, going fast on the water, not for the leisurely viewing of a peaceful, natural lakeshore. The disruption caused by these watercraft will definitely have an adverse effect on the experiences of others visiting the Lakeshore. I firmly believe that the current means of viewing the Pictured Rocks from the water are sufficient and that access to jet skis				

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should be denied.

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**Correspondence ID:** 103    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** It is disheartening to hear that there is interest in polluting the beautiful Pictured Rocks shoreline with PWC. So many inland lakes and public waterways have been over run with the wahhhh, wahhhh, wahhhh sound of PWC gunning and blasting their way with no regard for solitude and the sanctity of the outdoor wilderness. Pictured Rocks is a special place, a place that should be held in high regard and for the same reasons you wouldn't let ATV's into the land portion of the parks, why would PWC's be allowed to stink up the shore with gas, oil and sound pollution.

As an avid kayaker, hiker and camper there still needs to be places on earth where we can go to get away from noisy and ugly conveniences of modern life. While fun in their own regard, PWC have many places they can enjoy and stink up. I can't imagine the safety issues associated with the additional bodies and vehicles on the water. It's only matter of time before a kayaker and a PWC collide or some overzealous teenager decides to have some fun at the expense of a quiet boater. It is difficult to educate and rescue even the most prepared kayakers, I can't imagine what kind of situations PWC would present to authorities. Even kayakers and hikers have a negative impact on the cleanliness and accessibility of the Pictured Rocks shoreline, why would anyone want to add another dimension to a problem that is already hard to police. Everyone still has to register for campsites and the demand won't decrease when a PWC can swoop in and access even the most remote sites. What happens with a big blow pops up and a PWC can't be hauled above the high waterline like a kayak. Are we going to have mini oil slicks as a PWC is bashed on the rocks? Lastly as an Ohioan, I spend a lot of my recreational time and money in Michigan. Michigan has many incredible outdoor spaces. My incentive to drive 8-9 hours to experience Pictured Rocks diminishes if I'm elbow-to-elbow with PWC's. When I don't travel north my hard earned dollars don't travel with me.

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**Correspondence ID:** 104    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** I am a kayaker and hiker and like to visit places like the Pictured Rocks for the natural environment. The sights and particularly the sounds. So, my objection to jet skis/personal watercraft is directed mainly at the noise that they make in the way that they are normally used. I would also object to cigarette boats along the lakeshore (which it seems like can be heard from miles away). In both cases, the noise pollution of these machines can be heard even when the boats themselves can't be seen.

I have no problem with boaters of all types touring along the Pictured Rocks as long as they do it with respect for the other visitors, especially with respect to the loudness of their craft. If they feel the need to loudly zoom in visit and zoom out, then they are not showing that respect. If they cannot be trusted to show that respect, then they shouldn't be allowed along the Pictured Rocks.

No matter what restrictions are applied (e.g. "no PWC along the Pictured Rocks Lakeshore" or "PWCs along the Pictured Rocks Lakeshore shall limit the volume of their crafts to...") there will always be people who don't know the rules or just disobey them. It may come down to what is easier to enforce.

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**Correspondence ID:** 105    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** I am appalled that the NPS would consider degrading the beauty of the Pictured Rocks lakeshore with the obnoxious buzz of jet skis and other PWCs. The noise, fuel and environmental pollution those crafts would emit is a definite threat to the ecosystem of the lakeshore.

I am a seasoned kayaker and know both the beauty and the potential dangers of navigating the waters around the Pictured Rocks waters. Without sounding too biased, but based on observation and past experiences, the experience, aquatic skill and intellectual levels of most who venture out on jet skis is decidedly lacking. How many rescues have been undertaken of paddlers who had hours of experience and just happened to encounter Lake Superior weather turned foul? I have personally seen fog roll in, waves build to 4 feet in less than 30 minutes along the Pictured Rocks.

Please reconsider your potentially dangerous and lethal decision to allow jet skis on the waters along the Pictured Rocks. Do not allow this to become a national news report on a fatality that then prompts a reversal of your decision. Thank you

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**Correspondence ID:** 106    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** Born and raised in the great state of Michigan and now living in Florida where I own and operate my own kayak tour business. I pride myself on showing tourist from all over the world the quite waters of Florida that have been left alone for mankind to view wildlife and nature in it's purest state. There are few places of such beauty left in Michigan and it would so sad to hear that when sitting at the cliffs edge overlooking the crystal blue of Lake Superior, one would have to do so with the sound of PWC in ones ear. The beauty is to close your eyes, listen to the waves crash on the rocks and go back in time to when Indians canoed these waters. PWC have taken over any/everywhere leaving very little for those that kayak, hike, explore. What is to gain from allowing them but a few dollars in income, several injuries, and the furture distuction of the very Nature we seek.

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**Correspondence ID:** 107    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** Hi, I am a sea kayaker and a outdoor person. I love the outdoors, being in nature and seeing it from different angles that most other people can't or won't do. The solitude is an amazing experience. Allowing jet skis access would adversely effect the shoreline. The last thing I want to hear when out there is the engine noise when I am trying to enjoy the park. Most people who use jet skis just want to go fast, without much concern for anything but their own fun. Don't get me wrong, they are fun to ride, but the place to ride them is not along Pictured Rocks. As a kayaker who might be paddling along the shore, I don't need to have one of these zooming by me, creating a loud echo off the cliffs, extra waves or gas fumes to suck down. Plus most jet ski don't even pay attention to kayaker until there almost on top of them I think the current options of tour boats, personal watercraft, kayaks and tours that bring the kayak to the area are more than enough options for visitors to enjoy the shoreline. I really don't see any postive advantage of letting jet ski near Picture Rocks.

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**Correspondence ID:** 108    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 12:52:36  
**Correspondence Type:** Web Form  
**Correspondence:** I am in support of either maintaining the current restrictions on PWC between Sand Point and Miner's Beach with the addition of a park registration or permit system, OR a complete ban on PWC within the park.  
As an avid sea kayaker and hiker, my enjoyment of the PRNLS is dramatically impacted by the presence of PWC in the currently permitted zone when compared to the current exclusion zone. As a hiker, the sound and exhaust smells are very noticeable while hiking the cliff tops, and as a kayaker I have seen PWC operators disregard the safety and comfort of both single kayakers and groups of kayakers while operating at high speed in very unpredictable ways within the PRNLS boundaries. While paddling, the noise of the PWC rebounding off of the cliffs can be overwhelming, as well.  
I encourage all PRNLS visitors to enjoy and cherish the park, but believe that it should be done in a manner befitting the intent of the National Park system and the natural, spectacular places that it protects and shepherds.

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**Correspondence ID:** 109    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 15:31:12  
**Correspondence Type:** Web Form  
**Correspondence:** Please maintain the quiet waters and pristine environment of pictured by not permitting jet skis to use this area. My previous experience with those who use jet skies are that they love to go as fast as they can and cause as much upset to others using the lake. They also emit a great deal of noise which would severely impact the enjoyment of this most precious and natural resource. Thank you.

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**Correspondence ID:** 110    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 16:18:58  
**Correspondence Type:** Web Form  
**Correspondence:** Pictured Rocks is an absolute jewel of Michigan. I encourage the park service to continue to limit use of personal watercraft in the area. Personal watercraft would affect the natural surroundings of the area just with the noise that they produce and add to water contamination by their fuel discharges. In addition, I have

no doubt that there would be an increase in injuries and rescues in association with the use of them in what can be a rapidly changing water environment. There are already much safer opportunities for people to view the rocks from the water on one of the tourist boats if they need to use a motorized method. As a member of the National Parks Conservation Association, The American Canoe Association, and the Nature Conservancy, I have used my charitable dollars towards preserving these amazing places and promoting safe and non-intrusive recreational enjoyment of them. We must do all we can to protect these treasured areas!

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**Correspondence ID:** 111    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 17:58:47  
**Correspondence Type:** Web Form  
**Correspondence:** Thank you for holding the recent meeting regarding the PWC use along the Pictured Rocks National Lakeshore.  
Within the project issues for the ban of PWC, water and air quality is under question for how they are negatively impacted. Other areas around the nation such as Lake Tahoe, PWCs are only permitted if they meet EPA regulations. The park service could generate revenue by having the PWCs tested. The substantial majority of newer PWCs sold throughout the US already meet the lower emission standards.  
For the Soundscapes and the wildlife concerns, the newer 4- stroke motors are half as loud as the older 2 stroke motors, which was what the original survey was based on. The newer models are much quieter than any boat driving by with their large wake regardless of a slow speed.  
Where visitor conflicts and safety are concerned, many kayakers have actually been rescued by local residents that have been on a PWC. Most on a PWC respect the slow/no wake zone when close to any cliffs, beaches, or caves because they are able to maneuver in places that boats can not, even for a rescue.  
Park Operations funding could easily be generated by having all PWC to annually purchase a permit for use along the lake shore.  
PWC is a fun way to generate its own income by tourists. Many may not be able to drive a boat, but almost anyone can operate a PWC. This income can be turned right back to the park for any funding that is necessary. If the entire 42 miles of lakeshore were to be opened this would be an entirely new way to promote the city of Munising along side the park service to the tourists (customers).  
As a local to Munising, I personally have spent my summer days on my own PWC riding between the beaches of miners to Sand Point. I have brought many of my own out of state friends here to enjoy our beautiful scenery, when they are looking for alternative destinations to vacation to. Those that experience the lake shore, appreciate it, and I thank you for allowing us the useage of the east end of the PRNL for the past 7 years.  
I hope your decision will allow PWC to continue to use the 7 mile stretch, and possibly come to an agreement that will allow the entire lakeshore from here to Gran Marais to also be enjoyed by PWC.  
Thank you

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**Correspondence ID:** 112    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 18:10:19  
**Correspondence Type:** Web Form  
**Correspondence:** No way should PWC be allowed any closer than what is currently allowed. I do not like the noise they produce and it seems generally operators of these type watercraft have little regard for other watercraft. They are a nusiance and are unwelcome in most pristine areas. I'm originally from Hawaii and they are unwelcome on many of the beautiful coastlines there as well.

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**Correspondence ID:** 113    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 18:29:59  
**Correspondence Type:** Web Form  
**Correspondence:** The rules that are set forth for National Parks make no sense to apply to all parks. The jet ski issue is a waste of money. First and foremost you are singling out one of many forms that are on the Great Lake Superior. Second, you have people making decisions that have never been to the lake for a summer to observe. I have been on a jet ski since I was 18 years old on this lake. I took boaters safety and I understand the rules. I have never seen a jet ski that was breaking the law. If anything, we are more conscious of the laws because we are on the chopping block about how we decide to enjoy Lake Superior. I do not know anyone under the age of 28 that owns a jet ski. I know many people under the age of 28 that own boats. I have never seen a jet ski out of control. I have seen many boaters out of control. I have never seen a jet ski get to close to a moving boat. I have seen boats play chicken before. I have never seen a jet ski create a huge

wake. I have seen many boats, including the tour boats do much more damage with their wakes than my little jet ski. You cannot single out one avenue. If you are going to ban jet skis, then ban all motors. The rules that are trying to be applied are simply unsafe and not realistic. I was happy to see that I could once again launch my jet ski from Sand Point. It made no sense the my Dad could launch his boat and I could not launch my jet ski. It makes no sense that my friends can pull their pontoon on shore and I cannot pull my jet ski on shore. I please with you to look at this from a logical perspective. If we could make this a form of discrimination, it would be 100%. It is all or nothing here.

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**Correspondence ID:** 114    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 18:56:01  
**Correspondence Type:** Web Form  
**Correspondence:** Is this a solution in search of a problem? There doesn't appear to be a significant, if any, problem with these watercraft. In my opinion, if it's not an issue there should be nothingm to repair. The organizations concerned need to focus on real issues.

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**Correspondence ID:** 115    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 19:39:35  
**Correspondence Type:** Web Form  
**Correspondence:** I am opposed to any motorized personal watercraft allowed within the boundaries of Pictured Rocks National Shoreline.  
As a backcountry camper, I choose to escape the noise- and air-pollution of more populated communities to enjoy the solitude and pristine conditions of Pictured Rocks' beauty. The very last thing I want to hear is someone with their motorized PWC roaring by a location that I spent personal energy to get to. Silent paddlesports are acceptable water users. These folks have gone through a similar process of personal planning and execution, seeking Pictured Rocks' peace and quiet.  
I'm in favor of concluding the special regulation that allowed limited use of PWC on the surface of Lake Superior within the park. Let's save and cherish these special places on Earth.

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**Correspondence ID:** 116    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 21:35:54  
**Correspondence Type:** Web Form  
**Correspondence:** Personally ; I would prefer to have pwc's restricted to offshore. I believe that those craft are detrimental to the intended use of the lakeshore. Additionally, I believe the noise generated will be a distraction for the great majority of users destroying the sense of solitude and place the lakeshore affords.  
The lakeshore tends, I believe, to be principally used by human powered craft such as canoes and kayaks which are slower moving craft that tend to remain close to the shoreline. In other areas I have personally seen rather dangerous interaction between these craft and certainly don't think the lakeshore is the right place to have those interactions. As a general safety measure I would not recommend allowing package close to shore. Thanks for allowing me to voice my opinion.

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**Correspondence ID:** 117    **Project:** 39835    **Document:** 50079  
**Received:** Nov,07,2012 07:21:32  
**Correspondence Type:** Web Form  
**Correspondence:** I like to kayak and enjoy the natural habitat around me. Motor craft interrupt this as I can well verify. There are many rivers and lakes we have to share with the noise and smell of these vehicles. I hope Pictured Rocks keeps it's serene environment.

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**Correspondence ID:** 118    **Project:** 39835    **Document:** 50079  
**Received:** Nov,07,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** Dear Mr. Northup: The United States Environmental Protection Agency has reviewed the scoping request for the above-mentioned project provided by the National Park Service (NPS). Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.  
Pictured Rocks National Lakeshore (the Park) is located in northern Michigan. It was established as a nationally significant lakeshore is 1966 based on its proximity to Lake Superior, scenic shoreline, and mix of transitional wildlife and plant communities. NPS proposes to evaluate the use of personal watercraft (PWC) in the Park via an Environmental Assessment (EA).



In 2005, the Park implemented a special regulation to allow PWC use on the surface of Lake Superior within the park. PWC users were required to comply with State of Michigan regulations. In 2008, the U.S. District Court concluded that the previous EA was inadequate, but continued to allow PWC use in the Park while NPA undertook a new planning process. The forthcoming EA will evaluate whether continued use will be permitted or discontinued and how NPS will ensure protection of the Park's resources and values while offering a variety of visitor experiences consistent the Park's General Management Plan.

**Purpose and Need and Alternatives** The Draft EIS should include a definition of PWC, including which types of vehicles are included in the analysis and whether there are differences in requirements among the types of vehicles. For example, the Draft EIS should detail whether higher-impact vehicles (e.g., motorized boats) are allowed in the same locations or have different restrictions than lower-impact vehicles (e.g., canoes).

EPA recommends the EA discuss what factors precipitated the 2005 special regulation to allow PWC within the Park. This should include whether it came due to visitor requests and whether it is addressed in the General Management Plan. EPA also recommends projected PWC use numbers be included in the Draft EA.

The provided brochure indicates three proposed alternatives will be carried forward: 1) continued current management of PWC use, 2) expanded PWC use along the Pictured Rocks shoreline, and 3) ban PWC use within the park. The Draft EA should include alternatives removed from consideration and rationale for removal. For example, was continued PWC use with additional restrictions considered as an alternative? EPA recommends that proposed mitigation measures be explicitly outlined.

#### Impacts

**Water and Air Quality** EPA notes that discharges of gas and oil and vehicle exhaust emissions are existing impacts imposed by PWC users. The Draft EA should include current permit conditions mitigating or addressing these impacts, as well as additional proposed restrictions that could further reduce impacts to human health and the environment.

**Wilderness and Sensitive Areas** EPA strongly encourages alternatives be considered that restrict PWC use adjacent to designated wilderness areas and other sensitive areas within the Park.

Thank you in advance for your consideration of our comments. We look forward to reviewing the Draft EA

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<b>Correspondence ID:</b>	119	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,07,2012 11:58:30				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	<p>I don't represent a special interest group. Just someone who lives in this county and is an outdoor enthusiast. Lake Superior's weather does not permit everyday excursions to the park via the lake because of the winds, especially for small water crafts. I was only able to view the rocks twice this past summer because of high winds. These watercrafts (PWC) have no adverse affects to the rocks, especially when you consider them against the wakes and size of the Cruise boats that run along the coast. I believe that sandpoint and miners beach is acceptable areas to visit since the true numbers of these types of watercrafts are minimal. You are after all a National "Lakshore" which is only accessable by land for approximately 4 miles. Unless you plan to open up the Lakeshore to other people than backpackers and open more of the 42 miles, give the boaters a chance to see this park which they can't do by land. It is a National Lakeshore afterall.</p> <p>One last comment. I was sitting on my pontoon this summer and actually did not hear a PWC come by me until it was right there. Technology has come along way with the noise. Let us recreate on Lake Superior and the National Lakeshore.</p>				

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<b>Correspondence ID:</b>	120	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,07,2012 00:00:00				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	<p>Upper Peninsula Environmental Coalition P.O. Box 673 Houghton, MI 49931 <a href="http://www.upenvironment.org">www.upenvironment.org</a> November 7, 2012</p> <p>Jim Northup, Superintendent Pictured Rocks National Lakeshore P.O. Box 40 Munising, MI 49862 RE: PERSONAL WATERCRAFT (PWC) ENVIRONMENTAL ASSESSMENT</p> <p>Dear Mr. Northup:</p> <p>The following comments are submitted on behalf of the Upper Peninsula Environmental Coalition (UPEC). With regard to alternatives to be considered, UPEC clearly favors the alternative of prohibiting use of PWCs within the boundaries of Pictured Rocks National Lakeshore.</p> <p>UPEC is a non-profit corporation organized in 1975 under the laws of the State of Michigan. UPEC is "Dedicated to the Protection and Maintenance of the Unique Environmental Quality of Michigan's Upper</p>				

Peninsula". It is a regional conservation organization with more than 250 members who reside principally in the Upper Peninsula of Michigan.

UPEC believes that the following issues regarding use of PWCs within Pictured Rocks National Lakeshore must be considered, as a minimum, in any environmental analysis of this subject conducted by NPS:

- 1) PWCs adversely affect water quality. PWCs with 2-cycle engines are estimated to create exhaust in which an excess of 25% of their fuel and oil is unburned in addition to the products of incomplete and complete combustion. PWCs with 4-cycle engines, though cleaner, still emit a significant amount of pollutants into the air and water.
- 2) PWCs create a significant amount of noise, which is not compatible with the type of experience being sought by many visitors who visit Pictured Rocks. Our members, for example, visit Pictured Rocks to enjoy its natural splendor, complete with natural sounds. The noise from a PWC going by would almost certainly ruin that experience.
- 3) PWCs have the potential to disturb wildlife (both aquatic and terrestrial), including sensitive/rare species. The noise, wake, and pollutants emitted by PWCs could easily disturb or displace many species of native wildlife that inhabit Pictured Rocks. Further, because PWCs are more easily beached than other types of watercraft, PWC users could easily and quickly gain access to portions of the lakeshore not typically visited by people on a frequent basis, thus potentially leading to further disturbance of sensitive wildlife species.
- 4) PWCs create conflicts with other recreationists using Pictured Rocks, such as kayakers and hikers. Wakes from PWCs can be dangerous to kayakers. In addition, the sight of a speeding PWC going by would clearly negatively impact the recreational experience of a kayaker or hiker who has come to Pictured Rocks to enjoy the natural sights and sounds of the area.
- 5) In addition to the danger to kayak users caused by the PWC wake, the PWCs pose a threat of collision with other watercraft including kayaks, as PWCs have a higher rate of accidents than other watercraft.
- 6) Unlike most other watercraft, which are typically used mainly for transport, PWC users typically operate their crafts at higher speeds for the fun and sport involved. PWCs are often used in groups of two or more multiplying the amount of impact. The propeller-less propulsion system of PWCs allows them to operate in shallower water and at higher speeds in shallow water than other watercraft increasing their impacts on wildlife and other park visitors.
- 7) PWC use within the Lakeshore would certainly lead to law enforcement challenges for NPS, likely necessitating the hiring of additional law enforcement personnel to insure that PWCs are operating within the rules. It would be particularly difficult for rangers in motorized patrol boats to distinguish between different types of PWCs if differential regulations were applied depending on the PWC engine type. Where is this money for hiring additional staff going to come from, in this era of tight federal and state budgets?
- 8) Since PWCs are banned in other Lake Superior National Parks (Apostle Islands National Lakeshore and Isle Royal National Park) allowing them at Pictured Rocks National Lakeshore would be inconsistent with the regulations in these similar national parks.

For all the above reasons, we believe that PWCs are not compatible with the basic NPS mission to protect and preserve our nation's most unique and precious natural resources. PWCs can currently legally use a vast majority of all lakes and rivers within Michigan and the USA. There is simply no valid reason that they should be able to operate within the boundaries of a National Lakeshore also, when such use presents so many user conflicts and so many potential threats to natural resources of the Park.

With regard to alternatives to be considered, UPEC clearly favors the alternative of prohibiting use of PWCs within the boundaries of Pictured Rocks National Lakeshore. We expect that you will include this alternative within the analysis. If other alternatives are considered (that allow some degree of PWC use), we will look for NPS to conduct a comprehensive assessment of all the potential effects of PWC use within the National Lakeshore, including a thorough analysis of all issues we have mentioned above.

Thank you for the opportunity to comment. If you wish clarification of any aspect of these comments please contact me at the address or phone numbers listed below. If UPEC is not already on your mailing list for this project, please add us, using the name and address below:

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**Correspondence ID:** 121    **Project:** 39835    **Document:** 50079

**Received:** Nov,07,2012 12:36:33

**Correspondence Type:** Web Form

**Correspondence:** Dear Superintendent Northup,

I was unable to attend the scoping meetings concerning the use of personal watercraft within Pictured Rocks, and am therefore submitting my comments via this letter. I would strongly support the use of PWC within a prescribed region of Pictured Rocks National Lakeshore if their access to Lake Superior in our area were limited; but it is not. Access to the lake in the region is widely available. Therefore, I do not believe

that PWC should be allowed to operate within park waters for several reasons:

First, the noise generated by these machines is very likely viewed by the vast majority of the park's visitors as lessening their enjoyment of the park. I would assume that data exist which indicate the reasons most people have for visiting our nation's parks. If it is to enjoy nature and take a break from the press of urban living, the noise pollution generated by PWC will be incompatible with one of the primary reasons people have for visiting Pictured Rocks.

Second, the income generated by Pictured Rocks locally is critical. Repeated visits to the park by tourists would be less likely if their initial visit to the park is an irritating experience of annoyance due to the noise generated by PWC, and the proximity of PWC to their primary reason for coming to the park ? an escape from urban life to enjoy nature through activities such as hiking, sightseeing, tour boat gazing, kayaking, swimming, photography, a walk with the kids, or bird watching. Having tourists complain about having a part of their trip disrupted by noise when inevitably asked by friends "how was your trip?" would also do little to help promote tourism.

Third, the speed and noise of PWC have been shown to negatively affect wildlife. Research in New Jersey has indicated that the flushing response of nesting Common Terns was significantly stronger to PWC than power boats (Burger 1998). Research conducted in Florida similarly determined that PWC negatively affected a wide diversity of water-associated birds including plovers, sandpipers, gulls, terns, and wading birds such as herons (Rodgers and Schwikert 2002).

Fourth, the pollution generated by the two cycle engines used by many PWC is inappropriate for public property intended to provide high quality habitat for organisms and a natural area for human recreation.

Fifth, mitigating the negative effects of PWC through enforcement of regulations would be very difficult to achieve, and costly.

However, I do understand that human interests are diverse, and that meeting these diverse interests by allowing PWC within Pictured Rocks may be determined to be appropriate. If this proves to be the case, regulations protecting wildlife and the ability of those wishing to avoid the noise pollution generated by PWC will be critical, and should be adopted. In particular, I do not feel that access to the park's waters should be increased from that currently available. To do so would be threatening to wildlife and present an inescapable annoyance to visitors wishing to enjoy nature. This is particularly important in camping areas, within "earshot" of the North Country Trail, and the Beaver Basin Wilderness.

An appropriate buffer zone from shore and sand bars would need to be established in order to protect birds. Burger (1998) recommended a minimum distance of 100m from islands with nesting Common Tern colonies as well as reduced speeds. Rodgers and Schwikert (2002) concluded that buffer zones for foraging or resting plovers and sandpipers should be 100m, 140m for gulls and terns, and 180m for wading birds such as Great Blue Herons. Species from all of these groups use the shoreline and sand bars of Picture Rocks regularly.

It should be noted that sand bars are used heavily by gulls and regularly used by migrating sandpipers, likely as a mean of escaping human activity. Therefore I would encourage that buffer zones and speed restrictions concerning the shoreline be extended to include any sand bars that develop within park boundaries. This would be beneficial because almost half of all North American shorebird species and subspecies are experiencing population declines (see Skagen 2006 for a review), and two of the shorebird species I have observed within the park - Buff-breasted Sandpiper and Greater Yellowlegs, are listed as "highly imperiled", and six I have observed within the park - American Golden-Plover, Black-bellied Plover, Killdeer, Solitary Sandpiper, Semipalmated Sandpiper, and Least Sandpiper are listed as being of "moderate concern" in the U.S. Shorebird Conservation Plan (Szalay et al. 2000). Sand bars would most likely function best for wildlife if they were deemed a "no go zone" for humans.

Thank you for considering my views and concerns.

#### Literature Cited

- Burger, J. 1998. Effects of motorboats and personal watercraft on flight behavior over a colony of Common Terns. *Condor* 100:528-534.
- Rodgers, J.A., and S.T. Schwikert. 2002. Buffer zone distances to protect foraging and loafing waterbirds from disturbance from personal watercraft. *Conservation Biology* 16:216-224.
- Skagen, Susan K. 2006. Migration stopovers and the conservation of arctic-breeding calidridine sandpipers. *Auk* 123:313-322.
- Szalay, F., D. Helmers, D. Humburd, S.J. Lewis, B. Pardo, and M. Shieldcastle. 2000. Upper Mississippi Valley/Great Lakes Regional shorebird conservation plan. <http://www.fws.gov/shorebirdplan/RegionalShorebird/RegionalPlans.htm>

**Correspondence ID:** 122    **Project:** 39835    **Document:** 50079  
**Received:** Nov,07,2012 13:41:40  
**Correspondence Type:** Web Form  
**Correspondence:** I don't believe we need any more government regulation on the use of the land and water that we as tax payers own.  
This is the "alternative concept" that I would endorse.  
"Allow PWC use on Lake Superior along the full length of the park (approximately 42 miles), within the park's 0.25-mile jurisdictional boundary. PWC users could land anywhere on shoreline."  
Furthermore I don't beleive that we need to add restrictions to the current regulations regarding PWC's. Trying to police what type of motor a water craft has, and what areas certain water craft have the right to be wouldn't be feasible, and adding more cost to the users of the park is not necessary we already pay enough in taxes to cover this. Having more permit fee's like the one required on grand island to land a boat is just another way of enabling uncle sam to dip into our pockets.

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**Correspondence ID:** 123    **Project:** 39835    **Document:** 50079  
**Received:** Nov,07,2012 14:10:26  
**Correspondence Type:** Web Form  
**Correspondence:** The use of personal water crafts should not be restricted on the lake at this time. In order to benefit from experiencing the beauty of a community's natural resource means that it needs to be accessible to everyone not just on public or specifically licensed watercraft. Water Quality and Air Quality is an obvious concern for everyone who would like to preserve the Great Lakes for future generations and perhaps restrictions based on pollution only would make sense but common sense is essential because minimum water quality damage is worth it if the community can continue to enjoy the Pictured Rocks national park to the fullest and richest extent by using PWC. Soundscapes should not impact PWC. "experience of park visitors" should include all park visitors not just visitors who are "desiring a more natural or serene experience" The impact of PWC on soundscapes is too minimal to be considered a reason for limiting their use. If PWC specifically cause a large negative impact on Wildlife and Special Status Species, then that should be an obvious concern. As someone who goes boating every summer, I feel like PWC have little to no negative impact on sensitive species like the Bald Eagle who are thriving on the lake. As for Visitor Conflicts and Safety, I have never heard of any incidences in which overcrowding has been an issue. Pictured Rocks is a peaceful place and if that becomes a proven recurrent issue then PWC use should be restricted but it should not be a reason to restrict the PWC use preemptively. Park Operations and Cultural Resources, being able to use PWC in the Pictured Rocks park is a natural resource. It encourages tourism and provides a high quality of life for residents. Investing County resources into maintaining PWC use would be an asset to the community not a burden.  
After reviewing the Preliminary Alternative Concepts, I find prohibiting the use of PWC at Pictured Rocks to be an unacceptable solution. PWC should be managed under the existing conditions as there have been no major issues with the status quo. In order to better manage PWC use, there should be a permit system issued only to keep track of the number of boats actually being used on the lakes in these areas for future records. If numbers spike to an extremely unsafe level for the environment, then other measures should be taken like restricting PWC use to only those with 4-stroke engines or best available technology.

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**Correspondence ID:** 124    **Project:** 39835    **Document:** 50079  
**Received:** Nov,07,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** Thank you for the opportunity to comment. Over the last 10 years there has been significant discrimination against the PWC. Because the craft can operate in shallower water than other boats, some people see them as an annoyance and destructive. In reality with the smaller hull size, the PWC produces significantly less wake that boats as they pass by, especially boats that pull skiers or tubes at speeds below the natural planing speed of the boat. While PWC must travel at no wake speeds within 200 feet of shore, boats often ride closer to shore than that to avoid wind generated waves in lakes. And to make matters worse, they often pull skiers and tubes close to shore to avoid rough rides for the towed. Talk about significantly more impact to a shoreline, a towing boat is much worse than a PWC 200 feet from shore.  
As a scuba diver, I can assure you that waves generated by PWCs do not impact anything underwater greater than 6 feet, hardly a danger to underwater wrecks. The larger the wave, the greater the underwater disturbance, and since boats make larger waves, they impact the water to a deeper level.  
As to the noise argument, how many time have you heard extremely loud boats on the lake, boats with straight pipes and no muffling device. Then there are the cigarette type boats with multiple engines racing

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down the lake at speeds that cause extreme noise levels. Granted, earlier generations of PWC can have an annoying sound, those PWCs that have two cycle engines. Since 2002, PWC manufacturers have been concentrating on much quieter and cleaner burning machines and have turned to 4 stroke engines, resulting in more significant noise reduction. In fact all manufacturers have converted to only 4 stroke engines except for specialized stand up watercraft. So as time goes by, the older machines will be retired and the newer quieter machines will become more prevalent.

So as I see it, not only are boats more disruptive to shoreline, in terms of waves and noise (as they are closer to shore going at speed) but it appears that only PWC are being discriminated against unfairly. Making unsubstantiated and ridiculous claims to ban PWCs is wrong and immoral.

Let's not allow the ultra "environmentalists" ruin the boating experience for everyone just because they don't like PWCs. Then again they don't like any fossil fuel burning devices, so next they won't allow cars or trucks in parks either. Stop the foolishness already!

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**Correspondence ID:** 125    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 04:34:12  
**Correspondence Type:** Web Form  
**Correspondence:** Please keep jet skis and motorized vehicles restrictions the same.

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**Correspondence ID:** 126    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 08:49:28  
**Correspondence Type:** Web Form  
**Correspondence:** No Jets ski or motors in the park or within the park boundary. We need more quiet and we need places for wildlife where they are not harassed. Canoes and kayaks good, motors bad for environment especially when every other spot on the Michigan map is open for that type of destruction.

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**Correspondence ID:** 127    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 09:37:38  
**Correspondence Type:** Web Form  
**Correspondence:** Prohibit PWC use throughout Pictured Rocks. I have owned property within the Park buffer for twenty years or more and enjoy times spent there. My family and I hike the Park trails and cross country; most times finding ourselves at some overlook to the most beautiful Lake in the world. We enjoy the peace, quiet, serenity these walks give us. The very last thing I ever want to do is look down in The Lake to see, or worse, hear these PWC destroying our experience. This is not just a selfish position; there are obviously many other people (check the visitor roles) who visit this wonderful park with the same, un-imposing approach of experiencing what Mother Nature has to offer. Many can accomplish this at the same time and not detract from anyone else's quality of experience. The PWC owners have plenty of other opportunities in this State to ride their crafts. I know because I have had to listen and watch when usually at the time and place I would rather do without; but there I have no say / no choice. Here I do, and I repeat - DO NOT Allow Them Anywhere Within the Park Shoreline. Thank You.

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**Correspondence ID:** 128    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 09:43:07  
**Correspondence Type:** Web Form  
**Correspondence:** I live in Munising and enjoy the Pictured Rocks Lakeshore Park on a yearly basis. I also own two 4 cycle PWCs. I spend a lot of time on Lake Superior during our short summer months and enjoy being able to respectfully utilize the Park with the rules that the Park Service implemented the first time around. During the time on Lake Superior, I see other PWCs and only ONE time have I seen a PWC disobey the rules of the Park Service (it was an ignorance of the rules by one driver and the other driver with him quickly corrected him.) I do not want to see the ban of PWC on the Lakeshore. I think it would be a terrible injustice and contrary to one of the purposes of the Park (for all people to enjoy.)  
If you can tell me that a PWC is causing detriment to the environment, I have no problem with the use of banning them because the Park Service's job primary job should be to preserve. But there will NEVER be proof that ONLY PWCs are causing problems. This lawsuit is ridiculous to only talk about PWCs. (I have a hard time believing that ANY man made watercrafts have much of an impact on erosion. I have seen what those October, November, and December waves do.)  
What stops future lawsuits against the Park Service of motor boats, cruise ships, pontoons, camping, kayaks, etc? What stops the owners of PWC and other boats from suing the Park Service for not being able to utilize the Park. It is a never ending cycle of wasted tax payer monies.

It should be everyone's responsibility to preserve the beauty of the Pictured Rocks Lakeshore that surrounds us. I would like to see the Park Service continue to use the prior implementations. I ask you to please not take away an opportunity to enjoy our beautiful Lakeshore.  
I thank you for listening and want to express how impressed I was with Jim Northrup's work during this.  
Sincerely and respectfully submitted,

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**Correspondence ID:** 129    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 16:07:18  
**Correspondence Type:** Web Form  
**Correspondence:** Pictured Rocks National Lakeshore Munising Michigan  
11-4-2012  
Personal Watercraft, PWC use environmental assessment  
As a four-season hiker, skier and kayaker of Pictured Rocks National Lakeshore I have traveled countless miles of trails and waterways within the park. The purpose of National Parks is first and foremost to protect the quality of experiencing the natural wonders this country has to offer. Motorized traffic whether on land or water should be held to a minimum within parklands. Some modes of motorized transportation are more intrusive than others; PWC make the top of the list. There are very few things that shatter the silence along the cliffs of Pictured Rocks quicker than a PWC roaring by at full throttle. The cliffs act as an echo chamber and exemplify the noise even further. It is true other motorized watercraft utilize the shoreline however do to the nature of the PWC they exceed tolerable noise levels. Hikers and kayakers come here "to find peace and get away from noise".  
Safety is also a concern as PWC sit low in the water, maneuver quickly and I, personally have had experience with near collisions. Environmentally they also pose a problem as I have witnessed refueling and spilled gasoline on Miners beach.  
My take on it is the Park Service should ban PWC use along the entire shoreline of Pictured Rocks National Lakeshore.  
Thank you for your consideration  
Please withhold my personal information if possible.

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**Correspondence ID:** 130    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 16:54:14  
**Correspondence Type:** Web Form  
**Correspondence:** I'm a kayak guide for Northern Waters Adventures, a kayak tour operator out of Munising Michigan. During June, July, and August of this year, 2012, I guided 61 trips in Pictured Rocks National Lake Shore for a total number of 534 clients for the year. These were out and back day trips from the east end of Miners Beach to the arch east of Mosquito Beach, AKA Lovers Leap. I should add that Northern Waters Adventures guided many other kayak trips in the park which I did not guide personally and that while guiding I personally observed trips guided by another your operator on a daily basis in which the operator had 2-3 clients for every one that I of mine. Additionally, I've observed hundreds of private kayakers on the water.  
PWC usage has been slight during the trips I've guided. Of the 61 days I guided this year I'd say we saw PWC on maybe only 10 days. About half of the PWC's we saw followed the current regulations. Whether the PWC's followed the regulations or not the paddlers I was with were usually incredulous that they were allowed at all.

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**Correspondence ID:** 131    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 19:13:59  
**Correspondence Type:** Web Form  
**Correspondence:** I'm writing to express my concern with news the the NPS is being forced to perform an Environmental Impact That somehow PWC's are adversely effecting the Pictured Rocks lake shore. I have been visiting Munising area for over 40 years beginning with family trips from my boyhood home in Midland Michigan. In July of 1990 my wife and I spent our honeymoon on Mackinaw Island and brought our 2 up jet ski to ski Pictured Rocks. We spent three nights in Munising and three days touring pictured Rocks and Grand Island. We both agreed this was the second funnest activity of our honeymoon.  
Now 22 years later this past August we again visited Munising with our four children and two New Wave Runners that seat 3 people per boat. Again we spent 5 days and nights enjoying the Munising area hotels, fine dining, lake trout fishing and of course awesome scenery of Pictured Rocks & Grand Island on our PWC's. The feedback from the kids and my wife is that this was one if not the best vacations we spent as a

family in years. In fact everyone voted to make it an annual trip as its only 5 short hours from our Kewaskum Wisconsin home and some of the best PWC riding in the Mid West. In fact, we have talked to other friends who are avid PWC riders from our Wisconsin based marina who are planning on making the trip with us next summer.

Now the sad part. I have recently read that the NPS claims our PWC's have an adverse affect on "deep water shipwrecks", "annoying backpackers on shore" and "impacting the Au Sable lighthouse" on Grand Island. Wow are you kidding me? Not only is this crazy stupid talk, its sad that the NPS could end up banning PWC or moving to a pay or permit system for me and my family to enjoy this public waterway.

I hope this does not happen as I do not agree with this policy and would change our vacation plans as our family enjoys our PWC's and would look for an alternative location that supports our rights to use our Public Waterway in a responsible manner.

I hope you will share our love for Munising, Pictured Rocks and our passion for enjoying our PWC's with your readers and the NPS. We hope to be back in Munising in 2013.....

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**Correspondence ID:** 132    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 19:19:42  
**Correspondence Type:** Web Form  
**Correspondence:** Pictured Rocks is one of the best reasons to live in Michigan. What I treasure most is the tranquility, peace and beauty that it offers. In considering the greatest good for the greatest number of people, consider how far the sound of a single jetski engine can carry over the still waters of Lake Superior: Imagine it echoing off the walls near chapel rock, imagine it replacing the buzz of mosquitos in the blueberry picker's ear, imagine it disturbing a loon as she fishes near shore ----as one selfish individual gets a momentary thrill by tearing over the water on a personal watercraft, polluting the water and shattering the silence, the experience of hundreds of visitors (and wildlife residents) is diminished and the peace that they sought in this public sanctuary is robbed from them.  
I hope you will not allow this treasure that belongs to all of us to be compromised in the self-interest of a selfish few. I would support an all inclusive ban of PWC in the park, or at minimum, heavy regulation.  
Thanks for your consideration.

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**Correspondence ID:** 133    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 19:35:52  
**Correspondence Type:** Web Form  
**Correspondence:** One of the attributes of PRNL is the overall experience of the wonders of nature. To be able to look over Lake Superior and not feel the burdens of modern civilization is something that is precious. Jet skis are the bane of anyone that is seeking a good wilderness experience. Rather than encourage the sharing of nature's wonders, personal watercraft isolate individuals into a noisy self-important sphere, and combined with the unpredictability of Lake Superior, are likely to put riders in harm's way. Imagine sitting on a quiet rock enjoying the scenery and then a couple of people on jet skis come into view, doing the typical stunts and obnoxious behavior that we see all too often by such riders. There are thousands of places where PWC are allowed -- those folks can go there. Where does it continue? ATV's on trails? It's important to keep some place free of the noise pollution and irresponsible use of resources. I Say a resounding NO NO NO to PWC in the bounds of Pictured Rocks National lakeshore.

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**Correspondence ID:** 134    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 19:44:09  
**Correspondence Type:** Web Form  
**Correspondence:** I can't believe the park service is considering jet skis. Jet skiing won't drive tourism but it will hurt it. I come up to pictured rocks almost every year. It would be a very big disappointment to have the invasive sound of jet skis marring the experience.

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**Correspondence ID:** 135    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 20:02:36  
**Correspondence Type:** Web Form  
**Correspondence:** Please don't allow Jet Ski's in the Pictured Rocks! There are so many reasons this is a bad idea but the most important reason is to preserve the quiet space of such a lovely lakeshore . Thank you.

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**Correspondence ID:** 136    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 20:04:11

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<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	I reviewed the issues in the brochure, and the Project Issues section covers many of my concerns. The benefit of having such a beautiful and serene public space could be severely limited if personal watercraft were allowed in the area. I had never really considered the impact of jet-skis and other such personal watercrafts beyond noise and water pollution impacts, but the potential to disturb local protected and endangered species is worth serious consideration.		
<b>Correspondence ID:</b>	137	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Nov,08,2012 20:04:32		
<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	Please choose to not allow jet skis at Pictured Rocks National Lakeshore. I travel to PRNL to experience the majesty of the cliffs and the pure REMOTENESS and silence of the place, and I fear that jet skis, more than other types of personal watercraft, would mar the overall experience.		
<b>Correspondence ID:</b>	138	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Nov,08,2012 00:00:00		
<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	There are so many other places to use these machines but only one beautiful, peaceful and scenic Pictured Rocks National Lakeshore. Please do not allow jet skis into this pristine area. Protect this one of a kind ecosystem.		
<b>Correspondence ID:</b>	139	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Nov,08,2012 20:08:05		
<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	Thanks for soliciting comments. I would prefer to see PWC prohibited from Pictured Rocks National Lakeshore. thanks!		
<b>Correspondence ID:</b>	140	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Nov,08,2012 00:00:00		
<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	I do not think personal watercraft (jet-skis) should be allowed in the Pictured Rocks National Lakeshore. There are plenty of other places for people to use their personal watercraft. I have backpacked the Lakeshore Trail and feel that the presence of these machines would have a significant negative impact on the experience of those who are seeking a backcountry experience in the lakeshore.		
<b>Correspondence ID:</b>	141	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Nov,08,2012 20:31:31		
<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	I cherish the Pictured Rocks National Lakeshore and anything that would take away from the natural beauty it holds is unthinkable. The experience of back country hiking and camping would be severely negatively impacted by the noise PWC's would bring. I strongly urge the National Park Service to prohibit all PWC's within the Pictured Rocks National Lakeshore to preserve why people make the trip there in the first place, to slow down. get away from the hustle and bustle, and appreciate the natural beauty Michigan holds.		
<b>Correspondence ID:</b>	142	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Nov,08,2012 00:00:00		
<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	Dear National Park personnel, Jet skis are too noisy, smelly and annoying to allow in the National Park waters. They seriously degrade the experience of enjoying nature in the parks because they create noise that can be heard for a couple of miles away, and it is a particularly obnoxious sound. They also pollute the water by injecting gas and oil from their exhaust into the lake. I have often observed them speeding in too close to swimmers, recreational fishing boats and wildlife. Please do not allow them access to our national park waters. Thank you		
<b>Correspondence ID:</b>	143	<b>Project:</b> 39835	<b>Document:</b> 50079
<b>Received:</b>	Nov,08,2012 20:44:02		
<b>Correspondence Type:</b>	Web Form		
<b>Correspondence:</b>	The portion of Lake Superior touching Pictured Rocks National Lakeshore is what makes/completes the		



park. Those obnoxious, loud, irritating pwc's cannot be allowed within the area. They love to make noise, spin in circles, and they could care less if they're doing it directly in front of those trying to relax. They have absolutely no respect for land, water, wildlife, or anything but their own enjoyment. If allowed, the Park might as well abandon "back country hiking/camping permits". There will be no need for group sites or quiet times. The next thing "they'll" demand/push for, will be motorbikes, 4-wheelers, and side-by-sides on back country trails. Sound far-fetched? Just think about it, I never thought those horrible jet skis would "ever" be allowed anywhere near the park boundary, but, here we are. You must remember, there are many people who seek solitude in nature. This is why we backpack, hike, camp and swim in Pictured Rocks. Life has become very noisy, we're bombarded with it in so many places. We need to be able to visit nature and hear it, not pwc's out on The Lake (nor radios at 12Mile or Hurricane, please, please). There must be places that ban pwc's or what's the point of the Park? It was bad enough when H58 got paved. Now, I call it "motorcycle highway", because that's what it's become. Unfortunately, the Lakeshore Trail isn't what it was, in the 12Mile - Hurricane stretch. It's Loud. This is why you must protect the Lakeshore from being ruined. Please! There are plenty of other areas that allow those pwc's. I can't understand how "they" can even challenge you to allow them. It's a National Lakeshore?! It seems it would automatically be protected, just like "no 4wheelers". I have been a long time frequent visitor/guest of Pictured Rocks (30+ years). Of all the other Parks I've visited, across the US, it's the best. Why? Because of The Lake! Nothing comes close to Superior. It is beautiful, mysterious and I respect it, for it is dangerous. It's wonderful to swim in and look out on open water. Only the sound of it's waves, or a freighter way off in the distance. Ok, sometimes small boats, but not those rude pwc's. Please save this place for everyone to have somewhere to enjoy the combined beauty of undeveloped backcountry, or car camping, swimming, picnicing and a quiet "nature sounds only", "Greatest of the Great Lakes Park", to explore and appreciate. And please don't ever change the "first come, first serve" campgrounds. Absolutely, no reservation system. Thank you all for preserving Pictured Rocks.

<b>Correspondence ID:</b>	144	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,08,2012 20:53:37				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I think opening up Picture Rocks to jet-ski use is an absolute terrible idea. I thoroughly believe it will detract from the picturesque beauty and very much from the serenity of the lakeshore. There are many areas nearby that people can use for jet skiing and other loud watersports that allow them to still view some great scenery, but won't interfere with the experience of other visitors. I think one of the best things about Pictured Rocks is the kayaking and if it is opened up to jet skis, kayakers may be less inclined to paddle there. The noise pollution is probably the worst part and has the potential to negatively impact wildlife, so for that alone it should be avoided.				
<b>Correspondence ID:</b>	145	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,08,2012 20:56:14				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	As a frequent visitor to Pictured Rocks I would like to see the use of personal watercraft eliminated. Nothing is more annoying to me than jet skis violating the silence.				
<b>Correspondence ID:</b>	146	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,08,2012 21:27:22				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I am against allowing personal watercraft in the National Shoreline. Air and water and noise pollution. Ruins the peacefulness of the beach.				
<b>Correspondence ID:</b>	147	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,08,2012 21:44:48				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I urge that PWC use at Pictured Rocks be prohibited. Being subjected to PWC use is detrimental to humans and other species. Noise from PWCs negatively impacts my experience, as I seek a natural experience when I visit. When I visit the park, I hike in the backcountry and enjoy the wilderness. This is ruined when I hear the whine of the PWCs. I have seen PWC engines discharge gas and oil emissions directly into the water, resulting in potential impacts to water quality. It is nasty to swim or try to kayak in the water when PWCs are operating. I am concerned for my safety whenever they are operating.				

PWC movement and noise disturbs wildlife, especially waterfowl and shorebirds, potentially impacting their reproductive success. The Pictured Rocks shoreline provides important habitat for sensitive species that can be disturbed by PWCs. PWC engines negatively affect air quality for wildlife - and me -- by emitting hydrocarbons, nitrogen oxide, and carbon monoxide. Most unfortunately, the PWC users I have encountered don't seem to be aware of these issues, or perhaps they just don't care. In my experience, there is not enough staff or law enforcement at the park to also effectively manage PWC use; I think enforcement and resource protection will suffer without a ban on PWCs.

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**Correspondence ID:** 148    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** Please do NOT allow jet skis and personal watercraft near the Pictured Rocks National Lakeshore. They are noisy, the two cycle engines are prime polluters, and they will disrupt a pristine and fragile ecosystem. Thank you

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**Correspondence ID:** 149    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** This is a very BAD idea. This would destroy the serenity of the region, allow easier access to remote areas which would then be susceptible to litter, graffiti, and other destructive behaviors.

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**Correspondence ID:** 150    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** The purpose of this correspondence is to provide my recommendations for the scoping phase of a personal watercraft (PWC) environmental assessment (EA) for Pictured Rocks National Lakeshore (PRNL). Delay development of a final list of alternatives for personal watercraft use at Pictured Rocks National Lakeshore until the National Park Service collects appropriate background data. On or about October 5, 2012, the NPS produced and mailed to an unknown number of people a brochure describing the "scoping/Preliminary Draft Alternatives Brochure" for Pictured Rocks National Lakeshore. In this brochure, NPS had a list of "Project Issues." The wording of the "issues" on the list is not comprehensive, has no statements of context, has no citations as to the sources of the issue information, and in no instance offers any data to support the statement of issues. This very likely raises questions that may confront individuals who received the brochure and might like to know facts about the issues before passing judgement on allowing their fellow citizens access to PRNL. These questions may include (following the order of issues from the NPS brochure): ? Water Quality o How many PWC are involved ? annually or seasonally? o How do PWC engines compare with traditional boat engines for emissions into air or water? o How many traditional boats are involved? o What are the levels of water quality impact ? is there any recent data? ? Air Quality o Same questions as for water quality ? Soundscapes o PWC are currently not allowed in 70% of PRNL. How does that mitigate the impact? o Has there been any empirical data or other types of observation of soundscape, or is this a hypothetical issue statement? o How is PWC exhaust sound differentiated from other sounds? ? Wildlife o Are there any data or objective observations made on site at PRNL? ? Special Status Species o Same question as for Wildlife. ? Visitor Conflicts and Safety o There has been seven years of PWC use under the existing regulations. What ? if any ? conflict issues have been noted? o Has the existing or pre-PWC use (if any records exist) resulted in overcrowding as mentioned in the brochure? o Has any use data regarding PWC been collected before 2005 or since? ? Backcountry and Wilderness o Same questions as Soundscape. o Are there other impacts on the soundscape or visitor experience that have either been noted or are being subjected to proposed regulations? (i.e. what is the context of this issue?) ? Park Operations o How do all of the proposed alternatives compare with regard to impact on the management resources listed? o How have the past seven years of use impacted management resources? ? Cultural Resources o Are there any examples of cultural resources at PRNL being impacted? o What sort of impact does a PWC have on a light house or a sunken vessel? In particular, on a light house or sunken vessel that is miles from the existing PWC use area and/or dozens or hundreds of feet from the surface of the lake upon which the PWC (with six inches of draft) is operating? Finally, there is an issue that is not mentioned in the brochure. This is the economic impact of the business community and on PWC owners that the regulations may or already have imposed. As mentioned above, it is now seven years since the existing regulations restricting PWC access to a substantial portion of PRNL

were implemented. Prior to the adoption of the regulations, there was little if any collection of PWC economic data. Now, seven years later, the regulations whose impacts were unexamined before implementation will now be difficult to analyze. This makes it very challenging to find objective and accurate information about this issue that is important to the PRNL gateway communities and other communities throughout Michigan.

This summary shows clearly that there is a substantial lack of data regarding not only the existing use of PWC an PRNL, but also a lack of data before the implementation of the current regulations. This makes the situation seemingly impossible to analyze in any objective manner. Therefore NPS should delay their new management decisions until adequate data specific relating to issues to be managed within PRNL is acquired.

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<b>Correspondence ID:</b>	151	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 05:42:14				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	To whom it may concern. I am opposed to PWC near the shoreline of Pictured Rocks National Park. That park is synonymous with remote quiet beaches and stunning rock formations untainted by the obnoxious buzzing that we hear all the time on waters in more populated areas. Please do not allow them. The tour boats are enough motor activity. Jet skis and the like are just so jarring in natural settings. I've had decades of experience to compare the pluses and minuses. It would definitely impact my choices of where to go on weekends off work if I knew personal watercraft were going to be allowed up in that very special park. Thanks.				

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<b>Correspondence ID:</b>	152	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 06:10:23				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	NOOOOOooooooo snowmobiles in Pictured Rocks. I am still reeling from their inclusion at Yellowstone.				

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<b>Correspondence ID:</b>	153	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 06:26:50				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	Dear NPS, I am one of many who desires a limit on jet ski's and other noise sources in pristine natural areas. Please do not allow jet ski's or other recreational craft powered by internally combusting engines in our parks and public areas.				

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<b>Correspondence ID:</b>	154	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 06:34:12				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	Please do not allow PWCs at Pictured Rocks. The noise and danger to people is not in keeping with the natural beauty of the place. Thank you,				

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<b>Correspondence ID:</b>	155	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 07:04:20				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	Please, no jet skis in the Pictured Rocks. Thank you.				

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<b>Correspondence ID:</b>	156	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 07:06:47				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	I'm against the use of personal watercraft in Pictured Rocks State park. The noise they make is so distracting from the quiet of a beautiful place like Pictured Rocks. Please make the choice to not allow them in the areas of Lake Superior that are in the control of the Park Service.				

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<b>Correspondence ID:</b>	157	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 00:00:00				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	As a 31yr.resident of Alger Co.and employee of Pictured Rocks N.L.,I believe that allowing PWC's				

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(Personal Watercraft) to operate in the park has and will continue to have a negative impact on Park Management goals and the "Project Objectives" as stated in the Scoping/Preliminary Draft Alternatives Brochure. I have a concern for potential negative impact on all the Project Issues stated in this document. As an employee I have witnessed on several occasions PWC's launching at Sand Pt. then traveling at excessive speed, far in excess of no wake speed, at close proximity to swimmers and the swimmers beach. I have also witnessed on several occasions PWC's traveling at excessive speeds performing erratic maneuvers in very close proximity to the shoreline in areas such as Little Beaver, Chapel and 12 Mile Beaches. As a result there is a definite concern for Visitor Safety and conflict with other park users and disturbance of feeding and nesting wildlife particularly waterfowl, shorebirds and raptors. For visitor safety I strongly believe that PWC's should be prohibited from launching and landing on the Lakeshore except in life threatening emergencies. There is also a deep concern that PWC's have the potential to have a negative impact on Water and Air Quality particularly for backcountry users who filter their water in Lake Superior. In addition, there is no doubt that the noise created by PWC use is excessively loud and irritating resulting in a serious potential for creating negative impacts to the soundscapes affecting wildlife and those visitors who are seeking a more natural and calming environmental experience. I believe that it is in the best interest of the Park, its wildlife and our Park Visitors that the Alternative Concept - "Prohibit PWC use at Pictured Rocks" be selected. .

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**Correspondence ID:** 158    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 08:40:14  
**Correspondence Type:** Web Form  
**Correspondence:** Hello - thank you for the opportunity to voice our opinions on any issues in the Park. As an avid user of PIRO, I feel it already has very limited accessibility unless you are a hiker. I do not feel PWC at this time do any harm or endangerment to the Lakeshore. For the folks that do use their PWC, it is a great way to totally enjoy the cliffs, caves and beaches. We can't continue to eliminate ways for people to enjoy our beautiful areas. The impact of the PWC cannot be anything more than the Pictured Rocks Cruise boats - if anything, they are probably less. And at this time, the number of PWC are very little.  
We can all get along together on the lake - big tourist cruise boats, kayakers, recreational boaters and pontoon folks and yes, personal watercraft. This area is meant to be enjoyed and used by all. As I said before, it is hard enough to view and enjoy Pictured Rocks as it is. As I get older, I want to have options to enjoy the beauty. I don't want to take the Pictured Rocks boat cruise anytime I want to see the beauty. Or ride on the new road and catch a glimpse of the cliffs from the Miners Castle overlook, because that is the only place you can see them from land. Or buy a postcard or a picture.  
I represent no big organization against harming the environment -- I represent a local person who totally uses the lakeshore, a person who believes in preserving for the future, but someone who believes we need to work together and make all our national parks as accessible as possible for all people. Not when one person or one organization/group is able to dictate for everyone. Thank you.

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**Correspondence ID:** 159    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 09:13:42  
**Correspondence Type:** Web Form  
**Correspondence:** No Personal Watercrafts in Pictured Rocks!!!!!!!!!!

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**Correspondence ID:** 160    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 09:59:03  
**Correspondence Type:** Web Form  
**Correspondence:** Hi. I appreciate being able to comment on the use of personal watercraft at Pictured Rock.  
I would imagine there would be some concerns about safety in that a disabled craft forced against the rocks would not be a good situation.  
However I am mostly concerned about quiet. Almost everything in nature is best when it is quiet enough to hear. Motor sounds can be incredibly intrusive when one is simply really enjoying the quiet and the lapping waves, the rustling leaves. Jetskis can be obnoxious from two more more miles away, as can be trail bikes. Small aircraft are even worse. Being on foot, or bicycle, or kayaking or canoeing is quiet, unintrusive, and it is a joy to see other people having fun. I think the limit on fun should be, when does that fun intrude into other people's enjoyment. Perhaps I am just sensitive to noise, but jetskis are always intrusive and obnoxious to me.  
I love Pictured Rocks. I have hiked the whole trail. I have enjoyed the bluffs from the sightseeing boats. I don't think they are too bad. I can tolerate them, if they are not too much.

So please don't allow jetskis.

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**Correspondence ID:** 161    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** Personal watercraft should not be allowed, except for use by emergency personnel. The San Juan Island County, in Washington State, has banned these machines in the entire county, as it is county of salt-water islands with crucial habitat. The tourist values has been enhances rather than deflated. The primary concern should be for the flora and fauna and resources of the park. The noise is unquestionably obnoxious, and we have so little information about the ways in which that noise level might disrupt or drown out important communications buy insects or animal. \*See scientist/musicologist Bernie Krauss for studies of the complexity of soundscapes in determining the health of an environment. After considering noise pollution, please consider the petroleum pollutants: dirty exhaust gases, dirty exhaust water, potential for leaky engine oils and fuelsform the machines themselves, or from campers refilling their watercraft via jerrycans. Air pollution and water pollution are both concerns here. Next, please consider the harassment of wildlife, intentional or not. I believe that it is safe to assume that the kind of person who would go to a park to use the waterski, is also not the kind of person whose primary concern would be to care for the safety and comfort of the wildlife. Will the human users interfere with animals trying to drink or catch food at the shore, or birds trying to fish, ducks trying to raise ducklings, fish trying to come to the surface to eat insects? Water communities of zebra mussels and fish are negatively effected. Rookeries and nesting sites are harmed. Finally please consider the larger philosophy of the park. As habitat loss and environmental destruction continue, shouldn't the Park take an ethical stance of providing a sanctuary against the encroachment? Shouldn't the Park be a place where children can see for themselves, and understand, the value of protection of habitat? Thank you for your consideration

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**Correspondence ID:** 162    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** Personal watercraft should not be allowed, except for use by emergency personnel. The San Juan Island County, in Washington State, has banned these machines in the entire county, as it is county of salt-water islands with crucial habitat. The tourist values has been enhances rather than deflated. The primary concern should be for the flora and fauna and resources of the park. The noise is unquestionably obnoxious, and we have so little information about the ways in which that noise level might disrupt or drown out important communications buy insects or animal. \*See scientist/musicologist Bernie Krauss for studies of the complexity of soundscapes in determining the health of an environment. After considering noise pollution, please consider the petroleum pollutants: dirty exhaust gases, dirty exhaust water, potential for leaky engine oils and fuels form the machines themselves, or from campers refilling their watercraft via jerrycans. Air pollution and water pollution are both concerns here. Next, please consider the harassment of wildlife, intentional or not. I believe that it is safe to assume that the kind of person who would go to a park to use the waterski, is also not the kind of person whose primary concern would be to care for the safety and comfort of the wildlife. Will the human users interfere with animals trying to drink or catch food at the shore, or birds trying to fish, ducks trying to raise ducklings, fish trying to come to the surface to eat insects? Water communities of zebra mussels and fish are negatively effected. Rookeries and nesting sites are harmed. Finally please consider the larger philosophy of the park. As habitat loss and environmental destruction continue, shouldn't the Park take an ethical stance of providing a sanctuary against the encroachment? Shouldn't the Park be a place where children can see for themselves, and understand, the value of protection of habitat?

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**Correspondence ID:** 163    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 10:21:34  
**Correspondence Type:** Web Form  
**Correspondence:** I am definitely opposed to allowing watercraft or any other vehicle that is engine driven and gasoline powered in any National Park. I have spent much of my life cross country skiing, canoeing, mountain biking, hiking, rafting and sailing in Parks all over the Western United States. I have enjoyed and continue to treasure the silence and serenity of the few wonderful, wild places we have left. Noise polution is too prevelant and it is damaging to us and other animals more than we imagine. The ambiance and peace of

National Parks needs to be preserved.

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**Correspondence ID:** 164    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** Expanding the use of powered personal water craft is a terrible idea. It's likely to result in additional emergencies and injuries because of the typically cold water temperatures. It is also a huge environmental loss. There are few places where out door enthusiasts can enjoy the peace and quiet of a natural environment, and expanding the use personal watercraft takes away yet another one of these special places. Please, please, please do NOT allow the expansion of personal watercraft at Pictured Rocks.

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**Correspondence ID:** 165    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** On behalf of the National Parks Conservation Association and Freshwater Future, we respectfully submit the following comments on the public scoping process associated with an Environmental Assessment (EA) for Personal Watercraft (PWC) use at Pictured Rocks National Lakeshore (PIRO). Our organizations represent nearly 750,000 people who care deeply about protecting our national parks and ensuring that visitors have a safe, healthy and profound experience while enjoying the resources our national parks were established to preserve. Our members are dedicated to restoring and protecting our Great Lakes for the millions of people, who live, work and visit the shores. We appreciate the opportunity to comment on the EA.

We have reviewed the EA scoping/preliminary draft alternatives brochure and believe that the Preferred Alternative should be to prohibit personal watercraft use at Pictured Rocks. As we will discuss in these comments, it is the option that best comports with the National Park Service (NPS) Organic Act, the park's enabling legislation, and it's 2004 General Management Plan (GMP). Any level of PWC use would be inconsistent with the Organic Act because of the many negative impacts to the resources and values of Pictured Rocks. An outright prohibition on PWC use at the park is the only way to meet the NPS's various project objectives, such as protecting air and water quality, ensuring visitor safety and enjoyment, and minimizing operational needs and costs.

"(W)hy has NPS issued rules allowing jet ski use in two beautiful and pristine national parks, acknowledging that such use will impact, to varying degrees, water quality, air quality, wildlife, animal habitats, soundscapes, visitor use and safety, etc., when the users of jet skis are perfectly free to enjoy their vehicles in other, equally accessible areas, without threatening the serenity, the tranquility--indeed, the majesty--of these two national treasures?" - U.S. District Judge Gladys Kessler,

BACKGROUND Pictured Rocks has the distinction of being America's first National Lakeshore. It is also the only national lakeshore that currently allows the use of personal watercrafts within its boundary. The enabling legislation authorized the Secretary of Interior to establish PIRO in order to "preserve for the benefit, inspiration, education, recreational use, and enjoyment of the public a significant portion of the diminishing shoreline of the United States . . . ." Notably, the lakeshore was established as an "inland buffer zone in order to protect the existing character and uses of the lands, waters, and other properties within such zone for the purpose of protecting the watersheds and streams, and providing for the fullest economic utilization of the renewable resources through sustained yield timber management and other resource management compatible with the purposes of this Act.

Recreational use was clearly envisioned at the park. However, it is notable that the statute directs the Secretary to protect the existing uses of the lands and waters of the park. When the park was established in 1966, there was no personal watercraft use in Lake Superior near Pictured Rocks. PWCs were first permitted in Pictured Rocks around 1990. PWC use increased throughout many National Parks during that time and as a result, NPS proposed a rule finalized in 2000, which prohibited PWC use in all parks, except for 21 parks with a history of PWC use. These 21 parks, which included Pictured Rocks, were given a two-year grace period (ending on April 22, 2002) during which they could develop park-specific regulations allowing PWC use.

Bluewater Network, an environmental organization, was concerned that the rule was not protective enough of the 21 parks, and sued NPS. As a result of the lawsuit, a settlement ("Settlement Agreement") was reached which required any of the parks wishing to allow PWC use after the expiration of the grace period to develop park-specific regulations to that end. Under the terms of the settlement, such parks would also have to comply with the National Environmental Policy Act (NEPA) in developing a regulation to allow PWC use.

Shortly before expiration of the two-year grace period, in February 2002, then-Superintendent Karen Gustin issued a "Superintendent's Compendium" closing the park to all PWC use. Thus, upon expiration of the grace period, PWCs were prohibited at Pictured Rocks. However, during that same year, NPS began an Environmental Assessment ("EA") to evaluate the impacts of PWC at the park. Ultimately:

[i]n October 2005, NPS issued its Final Rule ? the "Pictured Rocks Rule" ? which re-authorized PWC use, as described in Alternative B; however, the use was restricted to an eight-mile segment of the park's 42-mile shoreline. The Pictured Rocks Rule also required that PWCs be launched from only one designated site, and prohibited PWC use within 200 feet of the shoreline unless traveling at a slow enough speed so that no wake was created. On May 15, 2008, Bluewater Network brought a new lawsuit, this time challenging the EAs for Pictured Rocks and the Gulf Islands National Seashore ("Gulf Islands" or "GUIS"). Bluewater Network argued that the EAs violated the Administrative Procedures Act, the National Park Service Organic Act, NEPA, and the parties' settlement agreement from the earlier litigation. The court remanded the GUIS and PIRO final PWC rules back to the agency because it found that NPS's conclusion that PWC use would not result in impairment under the Organic Act was not based on reasoned explanations.

NPS's Decision Making Standard NPS's actions are guided by its Organic Act, as amended, its own management policies, NEPA , and in this case, the Settlement Agreement. The Organic Act directs NPS to: promote and regulate the use of the . . . national parks, monuments, and reservations hereinafter specified . . . by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life 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.

In 1978, Congress passed the Redwoods Act, which reaffirmed Congress' mandate that: the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress.

NPS's Management Policies, which interpret the provisions of these statutes, state that the fundamental purpose of the park system "begins with a mandate to preserve park resources and values." The Management Policies go on to state that "the fundamental purpose of all parks also includes providing for the enjoyment of park resources and values by the people of the United States." While these two purposes may sometimes be at odds, the Bluewater Network court recognized that the conservation mandate predominates. According to the court:

"There can be no doubt, as NPS and the courts have concluded, that the overriding aim of the Organic Act, as well as the purpose of NPS' oversight and management of the park system, is to conserve the natural wonders of our nation's parks for future generations."

NPS is afforded broad discretion in implementing its conservation mandate. However, that discretion is limited by the terms of the Organic Act, which require the agency to manage the parks in a way that will leave them unimpaired for use by future generations. NPS's Management Policies indicate that "an action rises to the level of an impairment when the impacts of that action 'harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.'" NPS determines if an impairment would occur by evaluating "'particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.'" Thus, in order for NPS to justify continuing to allow PWC use in Pictured Rocks, it was required to find "no impairment" from the proposed regulation. The court in Bluewater Network rejected the reasoning behind NPS's "no impairment" finding for every impact topic considered. As a result of the Bluewater Network court's decision to remand, NPS has reinitiated a PWC use Environmental Assessment for Pictured Rocks. The agency is presently at the scoping stage of the analysis.

**PRELIMINARY ALTERNATIVE CONCEPTS:** NPS has proposed three preliminary alternative concepts for public consideration. In addition, NPS seeks input on the following measures, which could be added to the current regulations: 1) Restrict PWC use to only those with 4-stroke engines or best available technology; 2) Implement a permit system for use of PWCs on Lake Superior within the park; and, 3) Restrict PWC use adjacent to sensitive areas (Beaver Basin Wilderness, Grand Sable Dunes, and Chapel Beach).

1. Manage PWC use under the existing special regulation for the park. PWC use would be allowed to operate on the waters of Lake Superior within the boundaries of Pictured Rocks from the western boundary of the lakeshore up to the east end of Miners Beach.

It is clear from the court's ruling in Bluewater Network that NPS did not ? and likely cannot - credibly

demonstrate that the existing special regulation will not cause an impairment that would violate the Organic Act. The existing special regulation raises concerns with respect to negative impacts on water quality, air quality, wildlife, noise, and visitor safety.

**Water Quality:** With respect to water quality, the NPS staff at PIRO has not evaluated the impacts resulting from PWCs with 2-stroke engines. And staff has no way to quantify how many PWCs currently in use within park boundaries are 2-stroke, 4-stroke, or 2-stroke modified engines. As in the previous EA, the current EA should employ a conservative approach by basing the analysis on the use of 2-stroke PWCs. Without specific data indicating the percentage of 2-stroke versus 4-stroke PWCs in use at the park, the agency cannot credibly factor into the analysis any alleged benefits of 4-stroke PWCs.

NPS acknowledged, in the preamble to the 2000 Final National PWC Rule, a U.S. EPA "study that indicate[d] two stroke engines lose roughly 25% of the fuel they consume unburned into the water, resulting in high levels of hydrocarbon emissions from these engines." In the original EA for PIRO's existing special regulation, NPS found there would be "negligible to minor adverse impact" to water quality in the area where PWC use is permitted. Yet, the court in Bluewater Network faulted NPS for failing to: 1. indicate why a national, instead of site-specific, water quality standard was used; 2. adequately explain how the acknowledged impacts comport with the State of Michigan's designation of the portion of Lake Superior adjacent to the park as an "outstanding state resource water" ("OSRW"); and, 3. justify its finding of no impairment given the acknowledged impacts and State's OSRW designation, which bars any lowering of water quality.

According to a poll of registered voters, more than 75 percent of Democrats, Republicans, and Independents support continued federal funding to improve the water quality in the Great Lakes. In fact, the Great Lakes Restoration Initiative, a federal funding source to restore the Great Lakes, provides funding to federal agencies, including the National Park Service, to restore wetlands, habitat, and the waters of Lake Superior and the other Great Lakes. It seems contradictory at best for the park service to allow PWCs, proven to degrade water quality, at the very time there is strong public consensus, unified political will, and significant federal investment in cleaning and restoring the Great Lakes.

**Air Quality:** PWC emissions also cause negative impacts to air quality. As with its water quality analysis, the reasoning used in the original EA to support NPS's finding that these impacts did not cause impairment was deficient. The court faulted the agency for using a one-size-fits-all approach to analyzing air quality impacts. Specifically, the agency defined a "negligible adverse impact" as one where emissions were less than 50 tons/year for each pollutant. NPS also used current compliance with the Clean Air Act's "National Ambient Air Quality Standards" ("NAAQS") as a benchmark for different pollutants. However, the agency never explained why it was appropriate to use the 50 tons/year level as indicative of negligible impact when the NAAQS, dispersion patterns, and atmospheric chemistry for different pollutants vary widely. Going forward, NPS must take a closer look at the specific air pollutants emitted by PWCs. It must also establish credible benchmarks for each air pollutant, recognizing the unique hazards associated with each pollutant, as well as the unique setting of Pictured Rocks National Lakeshore.

Likewise, NPS must establish justifiable benchmarks for each pollutant associated with impacts to air quality related values such as visibility and ozone impacts to plant life. The original EA used the same arbitrary standard of 50 tons/year, combined with no evidence of current impacts, to define "negligible adverse impact" with regard to air quality related values. Moving forward, the thresholds used by NPS for each pollutant must be clearly related to both the ozone-related and visibility impacts of that pollutant. In addition, any discussion of air quality related values must consider the existing, documented ozone damage and visibility impairment at Seney National Wildlife Refuge (approximately 20 miles southeast of Pictured Rocks). Moreover it must consider the current inability of Michigan to meet the Congressionally-mandated goal of natural visibility at Class I areas ? including Seney ? by 2064; at current rates the goal will be met at Seney in 2209. Any additional burden of visibility-impairing pollutants, especially within such proximity, must be carefully considered and justified.

**Wildlife:** The NPS has acknowledged the negative impacts to wildlife associated with PWC use in its 2000 Final National PWC Rule. In fact, NPS noted that it "used existing and potential impacts to wildlife as a primary justification for banning and/or restricting PWC use." NPS also acknowledged: "There is increasing scientific evidence and anecdotal information that impacts to wildlife from PWC use may be more significant than those caused by conventional boats. . . . PWC can penetrate areas not accessible to conventional motorized watercraft. This access has the potential to, and has, adversely impacted wildlife. Studies by both James A. Rodgers, Jr. in Florida and Skip Snow in Everglades National Park support this contention. The fact that manufacturers recommend operation of PWC in a minimum of two feet of water to protect resources is admirable; however, it is evident that not all PWC operators feel compelled to comply with such recommendations. Further, no specific water depth has been established as a "safe" depth for



resource protection."

As explained by the court in *Bluewater Network*, NPS has not yet credibly explained why the acknowledged impact to wildlife does not represent "impairment."

**Soundscape:** NPS has also acknowledged the concern that PWCs create excessive noise. Commenters to the 2000 Final National PWC Rule raised "specific concerns includ[ing] the constant and repeated fluctuation in engine tone and pitch as PWCs enter and exit the water while jumping wakes, changing speed and performing other quick maneuvers along with the persistent noise associated with remaining in one general location rather than traveling from point-to-point." This excessive noise disturbs park visitors who come to the park to experience the stunning natural landscape for which the park was established. It therefore conflicts with NPS's objective to "reduce the potential for conflicts between users."

Additionally, the *Bluewater Network* court faulted NPS for its analysis of soundscapes. The agency acknowledged that, for safety reasons, PWC users at PIRO often travel in pairs. For this reason, NPS found that PWCs often create 85 decibels of noise at PIRO, which exceeds the agency's own regulatory standard of 82 decibels. NPS failed to adequately explain why they found "negligible adverse impacts" on soundscapes, despite the fact that noise from PWC use exceeds the agency's own regulation. Further, despite acknowledging potential impacts to wildlife from PWC noise, NPS failed to assess such impacts. **Visitor experience and safety:** PWC use under the existing special regulation also potentially endangers park visitors and certainly increases the potential for conflicts between visitors. NPS has conceded that "PWC use negatively impacts across a broad spectrum of park users." PWCs are known to be responsible for a vastly disproportionate percentage of boating accidents. Additionally, PWC use in PIRO is likely to conflict with park users in kayaks, those seeking a quiet hike along shoreline trails, those who are birding, and others.

**2. Prohibit PWC use at Pictured Rocks** This should be the preferred alternative, as it is the option that best comports with the NPS Organic Act, the park's enabling legislation, and its 2004 General Management Plan. As discussed extensively above, any level of PWC use would be inconsistent with the NPS Organic Act because of the many negative impacts to the resources and values of Pictured Rocks National Lakeshore. An outright prohibition of PWC use at the park is the only way to meet the NPS's plan objectives as well as fulfill the mission of the agency. These objectives include protecting air and water quality, protecting native wildlife, and ensuring visitor safety and enjoyment.

In addition to best meeting NPS's stated project objectives, a prohibition on PWC use would best comport with the park's enabling legislation. The PIRO enabling legislation directs NPS to protect the existing uses of the lands and waters of the park. The concept of personal watercraft was introduced in the 1960s, and Bombardier Recreational Products introduced a PWC in the late 1960s. It is impossible that PWCs were used in the waters of Lake Superior at Pictured Rocks in the 1960s when the park was established. Therefore, any allowance for PWC use is inconsistent with the enabling legislation.

The 2004 General Management Plan ("Plan") indicates, at that time, that regulations were in the federal rulemaking process regarding PWC use in the park. The Plan designated the park's .25 mile strip of Lake Superior as a "casual recreational" area. The Plan discusses that the proposed (now existing) regulations envisioned PWC use in a portion of the casual recreational area at the Park's west end from a designated launch site to Miner's Beach. Although it is mentioned in the plan, PWC use in the park is directly at odds with the overall goal of the Plan to manage the park "for the perpetuation and protection of the natural environment and the preservation of cultural features while making them available for appropriate public use."

**3. Allow PWC use on Lake Superior along the full length of the park** (approximately 42 miles), within the park's .25-mile jurisdictional boundary. PWC users could land anywhere on shoreline. This alternative cannot be squared with the NPS Organic Act, the PIRO enabling legislation, or the 2004 GMP. As discussed, even PWC use resulting from the existing regulation causes severe negative impacts to park resources and values. These impacts violate the Organic Act. Expanding PWC use across the entire shoreline of the park would only further exacerbate the negative impacts already being caused and cannot be justified.

**Additional Measures: Restrict PWC use adjacent to sensitive areas** (Beaver Basin Wilderness, Grand Sable Dunes, and Chapel Beach) The 2004 General Management Plan mentions the proposed (now existing) regulations in its discussion of the "casual recreational" area. However, any expansion of PWC use would conflict with the Plan's description of the proposed use as being limited to an area between Sandy Point and Miner's Beach. The NPS has recently placed the Beaver Basin Wilderness area in a pristine / primitive zone in advance of a Congressional wilderness designation. Given the water and air quality impacts, noise, and other impacts from PWCs, allowing their use adjacent to this and other pristine / primitive zones would certainly undermine the purpose of those designations.

Presumably NPS envisions that this variation, which would restrict PWC use adjacent to sensitive areas, could be coupled with the third alternative to allow PWC use along the full Lake Superior shoreline. However, even with such a measure, the third alternative cannot be saved, because it would represent an enormous expansion of PWC use at the park. Such an expansion would only worsen the negative impacts already being caused by PWCs and would be inconsistent with the 2004 General Management Plan.

Additional Measures: Restrict PWC use to only those with 4-stroke engines or best available technology AND Implement a permit system for use of PWCs on Lake Superior within the park. The existing special regulation alternative, Alternative 1, should only be given consideration in conjunction with a plan to implement a permit system and to limit PWC use to those with 4-stroke engines. However, even with a plan to implement a permit system and restrict access to 4-stroke PWCs, this alternative fails to meet the Project Objectives and the requirements of the Organic Act. First, there is some doubt as to the benefits of these newer engines. In Bluewater Network, the court noted a study cited in the Gulf Islands Rule, which indicated that newer engines produce increased NOx emissions.

Second, a PWC labeled as "4-stroke" may or may not actually possess the alleged benefits of a true 4-stroke PWC. NPS has acknowledged that "aftermarket modifications" are common. Specifically, operators are known to modify their PWCs to increase horsepower and thrust, which would impact noise levels as well as air and water pollution. Third, any actual noise reduction benefits from a true 4-stroke PWC may be cancelled-out by the fact that at PIRO, PWC users often travel in pairs as a safety measure. Thus, even if only 4-stroke PWCs were allowed in the park, there would likely still be impairment as with the existing regulation. Moreover, the administrative burden on NPS staff from implementing such a regulation would outweigh the benefits afforded to a limited number of PWC users. While restricting PWC use to those with 4-stroke engines and implementing a permit system would be improvements to the existing regulation, such initiatives would carry costly administrative burdens. These practices would require more staff time on the water to enforce the 4-stroke engine limitation, and in issuing permits. It is difficult to square such burdens with NPS' objective to "minimize operational needs and costs associated with the management of PWC use . . . ." And at a time when the National Park Service operational budget has been cut significantly and in turn staff positions have been eliminated, it is logical to assume that NPS would have to shift staff resources from managing park resources and enforcing regulations to issuing permits and checking engine capacity. In short, a plan to modify the existing regulation by restricting PWC use at the park to those with 4-stroke engines is flawed because of evidence that such engines produce increased NOx emissions, and are commonly modified by users in ways that negate any alleged environmental or noise benefits. Further, efforts to prohibit 2-stroke PWCs and/or initiate a PWC permit program, while improvements to the existing regulation, would conflict with NPS's goal to minimize operational needs and costs associated with management of PWC use. Thus, NPS would do well to heed Judge Gladys Kessler's words and recognize the ample opportunities to use PWCs in areas other than Pictured Rocks' pristine coastline, and prohibit PWC use in the park.

Conclusion: In closing, in response to concerns about PWC use in the preamble to its 2000 Final National PWC Rule, NPS stated that PWC use would be prohibited across the National Park System, "unless the NPS determines that PWC use is appropriate for a specific area based on that area's enabling legislation, resources and values, other visitor uses and overall management objectives." Clearly use of personal watercraft at Pictured Rocks National Lakeshore is not appropriate for the reasons stated above.

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<b>Correspondence ID:</b>	166	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 16:11:42				
<b>Correspondence Type:</b>	Web Form				
<b>Correspondence:</b>	To Whom it May Concern, I strongly disagree with allowing personal watercraft access to Pictured Rocks. This area is incredibly unique for its pristine beauty, bright colors and cleanliness. Allowing personal watercraft would not only mar the landscapes but would inevitable cause damage to the already eroding and extremely fragile rock faces. Although the majority of visitors on personal watercraft would likely have good intentions, there are always the careless few who will intentionally damage the landscape, litter and disrupt the nature scenery and wildlife. The limited hiking and boating access to Pictured Rocks is part of what has helped maintain its beauty over the years. There is no doubt in my mind that things will quickly degrade once word gets out that you can just hitch a ride on a jet ski. Please do not open the water access. Thank you for your consideration,				

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<b>Correspondence ID:</b>	167	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 00:00:00				

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**Correspondence Type:** Web Form

**Correspondence:** I wish to comment on PIRO's PWC Use EA as a local sea kayaker. I have kayaked along Pictured Rocks for approximately 12 seasons. PWC access in the area, as in many areas, has seen steady increases.

Regarding Project Issues:

Water Quality ? I have seen gas/oil discharges into Lake Superior from PWC, a direct effect on water quality.

Air Quality ? I have experienced the noxious smell of PWC as they zip along Pictured Rocks. Depending on the weather conditions, PWC fumes can hang in the air for a long time. If windy, the fumes are blown away. On a still day, one can paddle in fumes for extended periods of time. I have not quantified this, but would estimate 5-15 minutes in the right conditions. Not pleasant when participating in muscle powered activity! PWC fumes have a direct effect on localized air quality.

Soundscapes ? All motorized watercraft create noise, but the engines in 2-stroke PWC are particularly high-pitched and whiny. The sound carries for great distances. Again, depending on weather conditions, wind speed/direction, one can hear the whine of a PWC for miles. Most motor boats have a lower pitch that, while not particularly pleasant, does not negatively contribute to nearly the same degree as PWC. PWC have a direct effect on soundscapes along PIRO.

Visitor Conflicts/Safety ? I have not experienced safety concerns from PWC any more so than other motorized watercraft. As a kayaker, I feel it is my responsibility, as much as operators of other watercraft, to be alert to safety concerns and to paddle "defensively". I have definitely experienced "visitor conflicts", as attested to in my comments regarding water, air, and sound quality. PWC contribute to visitor conflicts, due to their sound and emissions.

Pictured Rocks is a special place. Paddling along the rocks is a wonderful experience, yet I do not expect it to be a "back country" or "wilderness" experience. There is motorized boat traffic. (Not sure what the rules are, specifically. Looked on the PIRO website, but found it amazingly difficult to find the rules for where boats are allowed, how close to the rocks, etc.) Many types of recreationists like to experience Pictured Rocks from the water and "I don't mind sharing"! That said, PWC, at least 2-stroke PWC have a bigger impact on a paddling experience than even cruise boats. PWC impacts on water/air/sound quality and visitor conflicts are greater than impacts from other motorized watercraft.

I would support alternatives that: ? prohibit PWC use at Pictured Rocks, or ? allow PWCs with 4-stroke engines (or best available technology, with 4-stroke being the minimum allowable) along the current allowable stretch of Pictured Rocks, from the western boundary up to the east end of Miners Beach.

Thank you for your consideration.

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**Correspondence ID:** 168    **Project:** 39835    **Document:** 50079

**Received:** Nov,09,2012 00:00:00

**Correspondence Type:** Web Form

**Correspondence:** I wish to comment on PIRO's PWC Use EA as a local sea kayaker. I have kayaked along Pictured Rocks for approximately 12 seasons. PWC access in the area, as in many areas, has seen steady increases.

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Air Quality ? I have experienced the noxious smell of PWC as they zip along Pictured Rocks. Depending on the weather conditions, PWC fumes can hang in the air for a long time. If windy, the fumes are blown away. On a still day, one can paddle in fumes for extended periods of time. I have not quantified this, but would estimate 5-15 minutes in the right conditions. Not pleasant when participating in muscle powered activity! PWC fumes have a direct effect on localized air quality.

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Pictured Rocks is a special place. Paddling along the rocks is a wonderful experience, yet I do not expect it to be a "back country" or "wilderness" experience. There is motorized boat traffic. (Not sure what the rules

are, specifically. Looked on the PIRO website, but found it amazingly difficult to find the rules for where boats are allowed, how close to the rocks, etc.) Many types of recreationists like to experience Pictured Rocks from the water and "I don't mind sharing"! That said, PWC, at least 2-stroke PWC have a bigger impact on a paddling experience than even cruise boats. PWC impacts on water/air/sound quality and visitor conflicts are greater than impacts from other motorized watercraft.

I would support alternatives that: ? prohibit PWC use at Pictured Rocks, or ? allow PWCs with 4-stroke engines (or best available technology, with 4-stroke being the minimum allowable) along the current allowable stretch of Pictured Rocks, from the western boundary up to the east end of Miners Beach.

Thank you for your consideration.

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**Correspondence ID:** 169    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 18:35:35  
**Correspondence Type:** Web Form  
**Correspondence:** Personal watercraft should not be allowed, except for use by emergency personnel The San Juan Island County, in Washington State, has banned these machines in the entire county, as it is county of salt-water islands with crucial habitat. The tourist values has been enhances rather than deflated. The primary concern should be for the flora and fauna and resources of the park. The noise is unquestionably obnoxious, and we have so little information about the ways in which that noise level might disrupt or drown out important communications by insects or animal. \*See scientist/musicologist Bernie Krauss for studies of the complexity of soundscapes in determining the health of an environment. After considering noise pollution, please consider the petroleum pollutants: dirty exhaust gases, dirty exhaust water, potential for leaky engine oils and fuels form the machines themselves, or from campers refilling their watercraft via jerrycans. Air pollution and water pollution are both concerns here. Next, please consider the harassment of wildlife, intentional or not. I believe that it is safe to assume that the kind of person who would go to a park to use the waterski, is also not the kind of person whose primary concern would be to care for the safety and comfort of the wildlife. Will the human users interfere with animals trying to drink or catch food at the shore, or birds trying to fish, ducks trying to raise ducklings, fish trying to come to the surface to eat insects? Water communities of zebra mussels and fish are negatively effected. Rookeries and nesting sites are harmed. Finally please consider the larger philosophy of the park. As habitat loss and environmental destruction continue, shouldn't the Park take an ethical stance of providing a sanctuary against the encroachment? Shouldn't the Park be a place where children can see for themselves, and understand, the value of protection of habitat?  
Thank you for your consideration

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**Correspondence ID:** 170    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 18:55:13  
**Correspondence Type:** Web Form  
**Correspondence:** I do not support further restrictions on watercraft within the Lakeshore.

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**Correspondence ID:** 171    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 23:09:50  
**Correspondence Type:** Web Form  
**Correspondence:** Please do not allow personal watercraft such as jet skis in our national parks..the parks are for all to enjoy without this kind of noise pollution and damage to our natural resources..

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**Correspondence ID:** 172    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 00:00:00  
**Correspondence Type:** Web Form  
**Correspondence:** As owner and guide of a kayak touring buisness, my comments are also those of my clients. I have guided kayak tours to Pictured Rocks National Lakeshore for over 20 years. NWA has provided a very popular service to thousands of park visitors. The over welming feeling on personal watercraft from my clients are that PWC's are not compatable with enjoying the park by kayak. Kayakers come to PRNL to explore the colorful towering cliffs and sea caves up close. In kayaks that need water only inches deep to glide,allows the kayaker to get close enough to touch the cliffs. Next to the cliffs, kayakers do not come close to the cruise boats, pontoon boats or sport boats, which stay farther out from the shore. However, we do get close to PWC user's, which can operate in shallow

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water next to the cliffs, like us kayaker's.

Because of bad past experiences, we watch the PWC user's carefully. Many PWC's user's accelerate so quickly close to us, we have to watch out for our own safety. The PWC loud noise and smelly exhaust fumes interrupt the tranquil solitude experience enjoying the park.

Kayakers seek solitude environments away from noise, exhaust fumes and heavy traffic. Therefore, I'm not in favor of PWC use anywhere in the park.

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**Correspondence ID:** 173    **Project:** 39835    **Document:** 50079  
**Received:** Oct,29,2012 00:00:00  
**Correspondence Type:** Park Form  
**Correspondence:** Useful as motorized vehicles are in many circumstances I feel they are also doing a lot of harm. Personal watercraft is one vehicle that is harmful. They endanger peace and tranquility in our lakeshore. They are intrusive, noisy and pose threats to swimmers kayakers and people who are simply walking the shoreline. As it is now jet skiers are permitted in certain areas but as most motorized vehicle owners they abuse these privileges we must have places to keep quiet in our lives, to enjoy the wonderful part of nature that our surrounding areas provide. In these modern days more and more motorized vehicles are creeping in our lives. We must be very careful here and not allow the loss of valuable tranquility. I vote NO to allow jet skis anywhere near Pictured Rocks National Lakeshore. As for biological damage to the waters I am not knowledgeable. I feel that you have educated people who are trained and knowledgeable to make good informed decisions.

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**Correspondence ID:** 174    **Project:** 39835    **Document:** 50079  
**Received:** Oct,27,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** In regards to use of PWC within the boundaries of Pictured Rocks National Lakeshore, we feel that: All Use Should Be Prohibited. There are vast miles of shorelines and open water in other areas of Michigan where these craft have free roam. We come to Pictured Rocks National Lakeshore to experience the sights and sounds of nature, and we feel the use of PWC is not consistent with the nature of the park. Thank you for allowing this comment.

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**Correspondence ID:** 175    **Project:** 39835    **Document:** 50079  
**Received:** Sep,11,2012 00:00:00  
**Correspondence Type:** Fax  
**Correspondence:** As a resident of Munising my entire life I have always considered the Pictured Rocks National Lakeshore as our back yard. Now more recently I was able to purchase my home with my wife on Sand Point Road, making the park literally my back yard. It is something that so many of us in our area take for granted. The beauty and majestic feel you get from traveling through, above, and around the park are things that make me proud of where we live. I have been privileged enough to be able to hike the trails, ride on the waters, fish the cliffs at Jaspers, and fly over our beautiful park. I even asked my wife to marry me on Miners Beach. It is the first thing I want to bring my friends and family to whenever someone comes to town. Now to hear that they are trying to take away a means of showing this beautiful place to those who want to come and share it concerns me. To ban the use of PWC from traveling the lakeshore would keep many people from being able to enjoy in the park. The restrictions that stand already keep the PWC's at a distance. I fear the possibility of banning PWC could only expand and take more ways of enjoying the lakeshore. I understand the Park Service is here to protect the land and the wildlife that calls it home. But it is to preserve it so that all can enjoy. To stop PWC is another niche of people that would no longer be able to enjoy the Park. Please DO NOT ban the use of PWC in the Pictured Rocks National Lakeshore.

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**Correspondence ID:** 176    **Project:** 39835    **Document:** 50079  
**Received:** Nov,06,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Dear Superintendent Northup: We have visited Pictured Rocks National Shoreline three times a year for 27 years. We have driven and walked most of the trails. It is the most serene, magnificent, peaceful place we have ever been. We have also participated in the research surveys you have done for the park, the road construction and various other issues. Pictured Rocks is a tranquil, lovely, peaceful haven for us and the many visitors and the wildlife that live there.  
We STRONGLY OPPOSE the use of PWCs on the water and surfaces of Lake Superior in the park!! The use of PWCs is frightening and disturbing to the wildlife. We have even seen people ride jet skis into areas

close to and into LOONS. This wonderful wilderness park is a place meant for the quiet enjoyment of the "Big Lake", the wildlife and scenery in it.

PWC people are selfish, rude and unacceptable in places like Pictured Rocks. The noise and antics is extremely irritating. These jet ski people are too lazy or revved up on their jet skis to enjoy the quiet solitude that is Pictured Rocks. There are many places people can use PWCs, but few places people can go to enjoy the quiet beauty of Lake Superior and the wilderness surrounding it.

The PWCs bring pollution from fuel, noise and contact with others who are sitting, hiking, canoeing and kayaking. It is very irritating to sit on the quiet shores of Lake Superior and hear the droning and ear piercing sound of the watercraft drown out the sound of the waves. There are few places people can go to avoid the noise pollution of cars, trucks, planes and jet skies. Pictured Rocks should be one of the places where we can retreat to the quiet solitude so hard to find in today's world. These people need to get off their jet skies to walk and enjoy the beauty and peace that is Pictured Rocks. PWCs spoil this magnificent National Park for the animals, shoreline, air, water and people who so dearly love this national treasure. Please ban the use of PWCs so the majority of the people who visit Pictured Rocks can have a quiet, delightful, and serene visit.

P.S. We would attend your meetings, but we live in Indianapolis, Indiana and it is a 12 hour drive.

However, if you have a real need for us to be there sometime in the future we will gladly make the trip!!

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**Correspondence ID:** 177    **Project:** 39835    **Document:** 50079

**Received:** Nov,07,2012 00:00:00

**Correspondence Type:** Letter

**Correspondence:** Dear Mr. Northrup,

I do not own a PWC, nor have I ever ridden but I do believe there is room for everyone in the park but with restrictions including noise, emissions, speed, and recklessness. Also I believe a permit system should be required.

My wife and I live of Grand Marais part time and are well aware of the problems that can arise but 99% of the people that use the outdoor for various activities are good and should not be penalized by the few who simply do not care. Obviously this means developing a way of apprehending and punishing those who do cause problems.

The rules developed must be fair, allow as broad access as possible, and enforced.

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**Correspondence ID:** 178    **Project:** 39835    **Document:** 50079

**Received:** Nov,01,2012 00:00:00

**Correspondence Type:** Letter

**Correspondence:** I am writing in regards to your plans of how to proceed on PWC use at the park.

I have had the opportunity to use the park several times a year, both hiking and camping, for the last 30 years. Along with friends and family I have hiked all the trails, one time going from Grand Marais to Munising. The park is a place where one can truly getaway and enjoy peace ok quiet and the beauty of nature. I want this Park to have these qualities for my children and grandchildren. I personal believe that PWC use should be prohibited throughout the park's full length. Thank you,

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**Correspondence ID:** 179    **Project:** 39835    **Document:** 50079

**Received:** Nov,09,2012 00:00:00

**Correspondence Type:** Letter

**Correspondence:** The Personal Watercraft Industry Association and its member companies Bombardier Recreational Products Inc. (BRP), Kawasaki Motor Motors Corp., and Yamaha (collectively, "PWIA") appreciate the opportunity to submit these comments in response to the National Park Service's ("NPS") October 2012 scoping notice for the Personal Watercraft Use Environmental Assessment ("EA") for Pictured Rocks National Lakeshore ("Pictured Rocks" or "the Park"). These comments supplement comments provided by Nicole Vasilaros on behalf of the PWIA at the recent public meetings on October 23 and 24, 2012. The PWIA's members are manufacturers and/or distributors of personal watercraft ("PWC"), and have unparalleled experience and institutional knowledge with respect to PWC.

The PWIA was founded in 1987 by the manufacturers of personal watercraft and is an advocate for safe and responsible PWC operation. The PWIA supports reasonable and fair regulations, strong enforcement of boating and navigation laws, and mandatory boating safety and education for all PWC operators. The PWIA is an affiliate organization of the National Marine Manufacturers Association ("NMMA"), the leading trade association representing the recreational boating industry in North America. There are 1.3 million registered PWC in the United States today, and only a tiny fraction of that number registered near and operated in the

Pictured Rocks area in Michigan. The recent economic downturn in the U.S. economy has had a significant impact on the boating industry, with production and sales volume for PWC decreasing in the past several years. Recent economic trends have altered the nature and trajectory of the PWC market since the last EA. The overwhelming majority of PWC sold today are three-passenger models, making them affordable and family-friendly vessels to experience and enjoy the outdoors at Pictured Rocks and elsewhere.

The PWIA commends and supports NPS in its undertaking this process under the National Environmental Policy Act ("NEPA"). NPS' scoping notice states that action is needed "at this time to address the inadequacies in the previous Environmental Assessment for PWC use at the park, as identified in the 2010 U.S. District Court opinion." In fulfilling this task, it is important to note at the outset that the Court did not make affirmative findings contrary to the NPS' substantive conclusions in the prior EA or the final rule for Pictured Rocks, but rather questioned, under NEPA and its implementing regulations, the procedures and metrics utilized for presenting impacts in the prior EA. The PWIA looks forward to working with the agency and other stakeholders to rectify these perceived procedural shortcomings during this process, including offering the PWIA's access to current PWC studies and data to inform NPS' review. The PWIA believes that this renewed process will produce a well-supported environmental analysis and rule reflecting the compatibility of PWC and other uses at Pictured Rocks.

For present scoping purposes, the PWIA respectfully requests that NPS consider the following specific comments in developing the draft EA. The PWIA looks forward to contributing and commenting further as the EA process continues.

**A. The EA Should Utilize Current, High-Quality, and Accurate Information.**

The prior EA was published in 2002, and the Finding of No Significant Impact ("FONSI") and final rule for PWC use at Pictured Rocks were issued in 2005. Since that time, NPS has the benefit of over seven years of PWC use in the Park. During that time there have also been developments in the law and in industry technology. This passage of time offers the opportunity to incorporate new PWC data and examine their relative expected impacts at the Park.

To the greatest extent practicable, the EA should proceed on the basis of concrete data and experience rather than generalizations, hypotheticals, anecdotes, or public perception. Under Council on Environmental Quality ("CEQ") regulations, NPS must use best available scientific information. 40 C.F.R. " 1500.1(b), 1502.22. The prior EA from 2002 had to project the numbers and effects of PWC once reintroduced to the Park, typically for a 10-year period ending in 2012, and the Court took issue with how the agency arrived at some of those projections. With 2012 nearly over, NPS can now rely on more reliable actual data in lieu of projections, and the EA should present an analysis of any actually measureable incremental effects attributable to PWC since PWC were reintroduced to the Park. NPS may draw from its actual experience during the period when PWC were initially used (early 1990s to 2002), when PWC were banned (2002 to 2005), and when PWC were reintroduced (2005 to present), and compare those findings to its original estimates. If the actual data closely aligns to projections, that will bolster NPS' original findings and earn greater deference to the forthcoming EA. Grounds for a FONSI similarly would be strengthened if effects did not change significantly upon reintroduction of PWC in 2005. If the projected and actual findings are different, that also will allow NPS to adjust its analysis accordingly. Moreover, if the existing 2005 rule is preserved, direct and indirect impacts regarding increased PWC use should be muted in the EA considering that PWC have already been operating in the Park for several years under that rule.

Thus, for scoping purposes, NPS should collect and consider data from the several recent years of PWC use at the Park, including any actually observed air, water, sound, and biological impacts directly attributable to PWC; currently observed or measured discharges from PWC and other boats; actual visitor experiences of PWC and non-PWC Park users; numbers and models of PWC; origins and usage trends for PWC at the Park; and other relevant topics. If NPS has not already gathered such information since passage of the Pictured Rocks PWC rule, NPS should take the time now to collect such data and test its prior findings. In addition, NPS should obtain and give greater weight to the views of local citizens who regularly visit Pictured Rocks. There are many longtime area residents who can offer valuable perspectives on the effects of PWC use. These views based on actual experience are more credible than statements by national groups predisposed to a blanket ban on PWC use anywhere in the country (and which the Court found had not visited Pictured Rocks or met standing requirements for their claims beyond NEPA).

**B. NPS Should Consider the Significance of PWC Impacts Holistically and in Furtherance of Consistent Park Management.**

The EA should assess any impacts from PWC not in a vacuum, but through a holistic and practical approach incorporating existing conditions and uses throughout the Park. Motorized boating has a long history at the Park since its inception in 1966. Park uses have included PWC since the early 1990s. It is well-established that PWC make up a very small fraction of total boating in Pictured Rocks, and an even smaller percentage

of total users. Based on information conveyed at the recent public meetings, only 75 total PWC were observed during the entire 2012 season (late May through mid-October). Park uses have diversified over time, particularly in frontcountry areas where PWC are present. These largely family-oriented activities include, but are not limited to, swimming, non-motorized boating, and PWC use. Other motorized boat uses include commercial cruises carrying several passengers.

While the PWIA understands that this EA is focused on PWC use at Pictured Rocks, the prevalence of motorized boating and other existing uses is highly relevant in providing the proper context to assess both the baseline conditions and the likely effects of PWC on the environment and visitors' expectations. The issue is not introduction of PWC into an area comprised entirely of "pristine" wilderness, as that term was used by the Court, but rather the aggregation of PWC with existing and diverse high recreational usage at the Park. As NPS has stated in Section 1.4.7 of its 2006 Park Management Policies, "[v]irtually every form of human activity that takes place within a park has some degree of effect on park resources or values, but that does not mean the impact is unacceptable or that a particular use must be disallowed." The "Purpose and Need" stated in the scoping notice also recognizes that the Park should be managed by "offering a variety of visitor experiences." The PWIA fully recognizes and supports the protected resources and values at Pictured Rocks. But this does not mean that continued PWC use will significantly affect the environment or foreclose other Park uses. Indeed, the Park is open to all people, and not every deviation from a natural state, every additional user, or every individually perceived annoyance is a significant impact.

Accordingly, the EA should explain in detail the full range of uses at the Park and where within the Park those uses take place, illustrating upfront that the entirety of the Park is not predominated by passive uses incompatible with PWC. Likewise, in formulating PWC alternatives and mitigation measures, the EA should consider the actual utility of certain PWC restrictions if motorized boats of greater size and in greater numbers may operate in those same areas. In the same vein, since NPS has indicated its desire to minimize operational costs, NPS should create a scheme utilizing consistent standards for similar activities. Relatedly, the analysis of cumulative impacts of PWC use should account for the PWC share of overall recreational use at the Park. When viewed in their proper context, NPS may again find that the effects of PWC at Pictured Rocks are insignificant under NEPA.

#### C. The Areas Open to PWC Should Be Maintained or Expanded Consistent with Other Park Uses.

The scoping notice lists three basic "preliminary alternative concepts": continue the existing rule, prohibit all PWC use, or allow PWC use along the full length of the park. The PWIA favors the third alternative, and at the very least the first alternative. Operation of PWC should be regulated consistently with other motorized vessels operating throughout the Park. The several years of PWC use from the Park's western boundary to Miners Beach demonstrate the absence of significant effects on the environment, and the PWIA perceives no legitimate documented reason to further restrict PWC use in that area. In fact, innovations in PWC technology and legal developments discussed below have lowered, and will continue to lower, the potential for adverse impacts. For example, with regard to visitor safety, PWC accidents are on the decline. See, e.g., U.S. Coast Guard Recreational Boating Statistics 2011, at 48 (available at <http://www.uscgboating.org/assets/1/workflow staging/Publications/557.PDF>). PWC safety is advanced by additional equipment safeguards and mandatory age and education programs. Indeed, at the scoping public meetings, it was reported that PWC were used to rescue kayakers in the Park this past summer. With regard to any local complaints against PWC use, NPS should investigate and collect actual data to factor into its analysis.

The PWIA also supports expansion of the shoreline area for PWC use. The PWIA recognizes that certain segments are more controversial than others, such as adjacent to the Beaver Basin Wilderness. However, PWC use along other portions of the shoreline likely would not impact the areas identified as most sensitive. For instance, the far eastern stretch of shoreline from Grand Murais to Au Sable Light Station would not appear to impact areas of note, and should be considered for PWC use. The recently paved H-58 road running from Munising to Grand Murais, providing increased access to a boat ramp at the eastern end of the Park, constitutes another factor supporting increased PWC access. Due to improved fuel economy, technological advances, and safe operator behavior, PWC users express consistent interest in long and unique scenic tours along Pictured Rocks' forty-two mile shoreline, akin to experiences presently offered by cruise boats and other services without significant effects on other Park values.

#### D. NPS Should Recognize and Incorporate Existing Standards.

Other laws and standards guide PWC use at Pictured Rocks beyond NPS' PWC use rule, some of which have been enacted or updated since the time of the prior EA study. These additional standards should substantially alleviate the Court's concerns and obviate additional restrictions in the PWC rule for Pictured Rocks.

Michigan state law imposes strict standards on PWC use and safety in Michigan waters, including in Lake



Superior. These requirements include prohibitions on PWC operation between sunset and 8:00 a.m., in waters less than two feet deep, and in a manner that disturbs vegetation. PWC users must also comply with a 200-foot buffer zone from the shoreline, a 150-foot buffer zone for crossing behind other non-PWC vessels unless at "slow, no wake speed," restrictions on speed and wake-jumping, age limitations (age 16 to operate an owned PWC alone), life-jacket requirements, and other restrictions. Violators are subject to fines and temporary prohibitions on their PWC use in the Park. Mich. Comp. Laws ' 324.80201-80222.

In 2007, NPS promulgated its final rule on "Boating and Water Use Activities." 72 Fed. Reg. 13694 (Mar. 23, 2007), codified at 36 C.F.R. ' 3.1 et seq. These rules set out additional nationwide standards applicable to PWC and other boats, addressing, among other things, safety and noise concerns. They also incorporate non-conflicting state laws and regulations, thereby promoting a system of consistent rules to facilitate understanding and compliance. See 36 C.F.R. ' 3.2(b). Regarding noise, NPS adopted prescribed sound decibel levels and testing standards from the National Association of State Boating Law Administrators ("NASBLA") Model Act for Motorboat Noise and the NMMA (which includes the PWIA) Model Act. The NPS rule limits PWC and other boats to "(1) 75dB(A) measured utilizing test procedures applicable to vessels underway (Society of Automotive Engineers SAE-41970); or (2) 88dB(A) measured utilizing test procedures applicable to stationary vessels (Society of Automotive Engineers SAE--J2005)." Notably, these noise thresholds are below the decibel levels assessed in the Court's opinion. The Court further noted, but did not accord any importance to, the reduction in decibel levels when utilizing a 200-foot buffer zone. The PWIA's member companies have not only met, but exceeded, these noise requirements by complying with another sound emission standard, ISO 14509. The ISO 14509 limitation is 75dB, measured 75 feet from shore, at a test speed of 40 miles per hour. ISO 14509 is effectually different from SAE-J1970, which sets a 75dB recommended practice during shoreline testing at wide open throttle with no distance measurement. All PWIA member manufacturers meet the ISO 14509 noise standard. Advances in PWC hull design technology include the following features to achieve reduced sound emissions: engine mount isolation, quieter four-stroke technology engines, advanced water jacketing, water lock boxes/mufflers, and exhaust exits at the air/water interface.

With respect to air emissions, the Environmental Protection Agency regulates emissions from PWC and other marine outboard engines under the same regulation. 40 C.F.R. Part 1045. EPA promulgated its most recent emissions standard in 2008, applicable to PWC model year 2010 and beyond. PWC are also subject to EPA evaporative emission standards at 40 C.F.R. Part 1060, most recently promulgated in 2009. Since 1998, PWC have achieved a 75% reduction in hydrocarbon and nitrogen oxide emissions. Today, PWC emit 16 gr/KW-hr of hydrocarbon and nitrogen oxides, compared to 300gr/KW-hr prior to 1998. All PWC manufacturers also meet the California Air Resource Board ("CARB") PWC emission requirements. With the implementation of the EPA final rule in 2010, both CARB and EPA emission standards are harmonized. At this time all new PWC engines are certified to meet both CARB Three Star and EPA 2010 standards, making them some of the cleanest engines on the water today.

Finally, NASBLA has promulgated additional model acts that may serve as useful references for standards in conducting the EA study.

#### E. NPS Should Not Enact Additional Unnecessary Restrictions on PWC Use.

Given the overlapping regime of applicable laws and standards to protect various resources and values at Pictured Rocks, and in the absence of evidence showing significant environmental harm to the Park due to PWC use, it is unnecessary to impose additional restrictions on PWC use beyond those in the current rule. For example, a categorical distinction between two-stroke and four-stroke engines as suggested in NPS' scoping notice would not be optimal because certain two-stroke engines (direct injection, as opposed to carbureted) offer noise levels and improved emission standards comparable to four-stroke engines. To the extent NPS elects to carry certain measures into more detailed alternatives or mitigation analysis in the EA, NPS should not select such measures unless the restrictions are fully explained and the purported benefits are supported by credible evidence. Indeed, the Court did not appear to comprehend the source or marginal utility between the selected alternative and the expanded use alternative in the prior EA, particularly since both options were described as having nearly indistinguishable impacts on several Park resources. In the forthcoming EA, NPS need not present a greater number of alternatives or adopt greater wholesale restrictions, but should better explain the sources and basis for the alternatives studied.

#### F. Socioeconomic Impacts Must Be Fully Considered.

As in its prior EA, NPS should properly consider the economic and social impacts interrelated with its environmental analysis. 40 C.F.R. ' 1508.14. While the Court did not take issue with NPS' prior analysis of these types of effects, NPS should ensure that its draft EA considers not only the effects of PWC use on the local population and economy, but also the socioeconomic effects of further restricting PWC use. On one hand, NPS should consider any increased visitation to the Park and corresponding economic

benefits to the Park and surrounding area if NPS preserves or expands PWC use. On the other hand, NPS should not enact new restrictions without considering their local impacts. The Court noted the concern of PWC users driving other users out of the Park, but did not acknowledge the fact that restricting or banning PWC would have the same effect on PWC users. At Pictured Rocks, most PWC are based and used locally, rather than rented or transported from distant locations. Thus, imposition of new technology-based or other limitations could have the effect of excluding local users.

#### G. Conclusion

Thank you for the opportunity to provide these NEPA scoping comments regarding continued use of PWC at Pictured Rocks. The PWIA and its members appreciate NPS' careful consideration of these views, and support this important project. The PWIA believes that an objective reevaluation of the relevant issues in the EA to address the Court's procedural questions will support maintaining PWC among the wide range of appropriate recreational opportunities that are consistent with environmental protection and visitor enjoyment at the Park.

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<b>Correspondence ID:</b>	180	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,29,2012 00:00:00				
<b>Correspondence Type:</b>	Letter				
<b>Correspondence:</b>	Dear Sir My new Sea-Doo watercraft is one of the cleanest, quietest boats on the water. I know, because I live on the water and hear the rest of them. I believe its quite unfair for my boat to be banned while every other barge and dinghy is permitted. We already suffer being the only boat on the lake that has to rush back to shore as soon as the sun sets. I have visited Pictured Rocks National Seashore in the past and may enjoy doing so again in the future. Please end this unfair discrimination.				

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<b>Correspondence ID:</b>	181	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,07,2012 00:00:00				
<b>Correspondence Type:</b>	Letter				
<b>Correspondence:</b>	Concerning the preservation of our Pictured Rock National Park environment and why personal water craft are detrimental and dangerous. They are already known to be dangerous in any swimming area ? They are detrimental to the peacefulness and quietness of the environmental that the park was intended for. Let us continue to protect this small piece of land and water from the pollution of sounds, and chemicals in the air that surround us daily. Lets keep it a place where we can find healing physically mentally and spiritually.				

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<b>Correspondence ID:</b>	182	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,26,2012 00:00:00				
<b>Correspondence Type:</b>	Park Form				
<b>Correspondence:</b>	First of all, thank you for hearing my comments on this park issue. PWC within the park has been a big issue for sometime now. Although the numbers seem to be relatively few there presence has a big impact on other visitors to the parks experience. I believe for me and others the main complaint is the noise factor they create. I and others expect and desire our time in the park to be a stress free experience where nature soothes our souls from the noise and chaos of city living. We expect the park to be a place of peace and serenity. The annoying noise created by PWC intrudes and often totally destroy that. Their versatility allows them access to every nook and cranny of the shoreline. As they line up with all the pontoons and motorboats along the "choice" beaches they make it completely impossible to walk the shoreline. Beach combers and those wishing to walk the water shoreline are forced to to skirt around these motored vehicles like a watercraft parking lot. The fumes and gas pollution on the water surface create a polluted stroll on the greatest lake. Nature suffers greatly from the preserve of motored vehicles, defeating the goals of setting aside land for nature preservation. There are plenty of places else where that provide use for PWC. The park does not need to be one of them. I feel they are counter productive to the purpose of the park and should be banded.				

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<b>Correspondence ID:</b>	183	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,07,2012 00:00:00				
<b>Correspondence Type:</b>	Fax				
<b>Correspondence:</b>	Dear Mr. Northup: The following comments arc submitted on behalf of the Upper Peninsula Environmental Coalition (UPEC). With regard to alternatives to be considered, UPEC clearly favors the alternative of prohibiting use of PWCs within the boundaries of Pictured Rocks National Lakeshore.				

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UPEC is a non-profit corporation organized in 1975 under the laws of the State of Michigan. UPEC is "Dedicated to the Protection and Maintenance of the Unique Environmental Quality of Michigan's Upper Peninsula". It is a regional conservation organization with more than 250 members who reside principally in the Upper Peninsula of Michigan.

UPEC believes that the following issues regarding use of PWCs within Pictured Rocks National Lakeshore must be considered, as a minimum, in any environmental analysis of this subject conducted by NPS:

- 1) PWCs adversely affect water quality. PWCs with 2-cycle engines are estimated to create exhaust in which an excess of 25% of their fuel and oil is unburned in addition to the products of incomplete and complete combustion. PWCs with 4-cycle engines, though cleaner, still emit a significant amount of pollutants into the air and water.
- 2) PWCs create a significant amount of noise, which is not compatible with the type of experience being sought by many visitors who visit Pictured Rocks. Our members, for example, visit Pictured Rocks to enjoy its natural splendor, complete with natural sounds. The noise from a PWC going by would almost certainly ruin that experience.
- 3) PWCs have the potential to disturb wildlife (both aquatic and terrestrial), including sensitive/rare species. The noise, wake, and pollutants emitted by PWCs could easily disturb or displace many species of native wildlife that inhabit Pictured Rocks. Further, because PWCs are more easily beached than other types of watercraft, PWC users could easily and quickly gain access to portions of the lakeshore not typically visited by people on a frequent basis, thus potentially leading to further disturbance of sensitive wildlife species.
- 4) PWCs create conflicts with other recreationists using Pictured Rocks, such as kayakers and hikers. Wakes from PWCs can be dangerous to kayakers. In addition, the sight of a speeding PWC going by would clearly negatively impact the recreational experience of a kayaker or hiker who has come to Pictured Rocks to enjoy the natural sights and sounds of the area.
- 5) In addition to the danger to kayak users caused by the PWC wake, the PWCs pose a threat of collision with other watercraft including kayaks, as PWCs have a higher rate of accidents than other watercraft.
- 6) Unlike most other watercraft, which are typically used mainly for transport, PWC users typically operate their crafts at higher speeds for the fun and sport involved. PWCs are often used in groups of two or more multiplying the amount of impact. The propeller-less propulsion system of PWCs allows them to operate in shallower water and at higher speeds in shallow water than other watercraft increasing their impacts on wildlife and other park visitors.
- 7) PWC use within the Lakeshore would certainly lead to law enforcement challenges for NPS, likely necessitating the hiring of additional law enforcement personnel to insure that PWCs are operating within the rules. It would be particularly difficult for rangers in motorized patrol boats to distinguish between different types of PWCs if differential regulations were applied depending on the PWC engine type. Where is this money for hiring additional staff going to come from, in this era of tight federal and state budgets?
- 8) Since PWCs are banned in other Lake Superior National Parks (Apostle Islands National Lakeshore and Isle Royal National Park) allowing them at Pictured Rocks National Lakeshore would be inconsistent with the regulations in these similar national parks.

For all the above reasons, we believe that PWCs are not compatible with the basic NPS mission to protect and preserve our nation's most unique and precious natural resources. PWCs can currently legally use a vast majority of all lakes and rivers within Michigan and the USA. There is simply no valid reason that they should be able to operate within the boundaries of a National Lakeshore also, when such use presents so many user conflicts and so many potential threats to natural resources of the Park.

With regard to alternatives to be considered, UPEC clearly favors the alternative of prohibiting use of PWCs within the boundaries of Pictured Rocks National Lakeshore. We expect that you will include this alternative within the analysis. If other alternatives are considered (that allow some degree of PWC use), we will look for NPS to conduct a comprehensive assessment of all the potential effects of PWC use within the National Lakeshore, including a thorough analysis of all issues we have mentioned above.

Thank you for the opportunity to comment. If you wish clarification of any aspect of these comments please contact me at the address or phone numbers listed below. If UPEC is not already on your mailing list for this project, please add us, using the name and address below:

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**Correspondence ID:** 184    **Project:** 39835    **Document:** 50079  
**Received:** Nov,09,2012 00:00:00  
**Correspondence Type:** Fax

**Correspondence:**

Dear Superintendent Northup,

I'm writing today to submit input on issues and concerns addressed as part of a new planning process involving personal watercraft (PWC) use at Pictured Rocks National Lakeshore (PRNL). The following points and discussion are submitted by the American Watercraft Association on behalf of its nationwide membership of PWC owners and dealers.

In October of 2012, the NPS produced and mailed to interested parties a brochure describing the "Scoping/Preliminary Draft Alternatives Brochure" for Pictured Rocks National Lakeshore. In this brochure, NPS listed a number of "Project Issues." We are concerned about the wording of some of these described "issues." Many of the points raised lacked comprehensible context, or citations as to the sources of the issue information, and in no instance offered any data to support the statement.

The NPS should provide context of boating issues as a preliminary step before development of PWC specific regulations.

We understand the frivolous nature of the lawsuit which resulted in the court order of 2010 which has led us to this point. Personal watercraft owners have long been singled out from all other recreational boating issues. We clearly understand that park staff has far more pressing issues to contend with than this lengthy and expensive process. Indeed, it will be a challenge for all parties considering the appropriateness of possible PWC regulations without an understanding the context of PWC use vis-a-vie all motorized recreational boating at PRNL. Selecting a total universe of PWC visits to PRNL of 75 voyages in the past season tells the public nothing about how much boating occurs at PRNL, what types of boats are used, the length of the boating season and other issues providing a rational basis for evaluating the impact of PWC. This is an important point when considering issues such as soundscapes in the backcountry, or wildlife disturbance ' specific issues NPS suggests may be factors in future regulations.

Consider that if there are two or more motorized vessels underway in the same vicinity, one being a PWC, how is it possible to determine the impact on soundscape of the PWC alone? The same question would apply to backcountry and wilderness where the would- be park visitor does not even see the vessels involved and may rightly or wrongly believe the sound is generated by a PWC.

With respect to wildlife, as you know, any movement, noise, or approach can disturb wildlife. When there are other vessels ' powered or not ' in the vicinity, how can the impact of PWC be determined? Further, if PWC are not initially present but join a group of boats (and hikers?), how is it possible to single out PWC as a source of wildlife disturbance? PRNL rangers have said that some of their specific concerns with PWC are their operation in the presence of non-powered vessels. It seems quite logical that the context of only 75 PWC voyages a year compared to an unknown number of other powered and non powered vessels and the impact on wildlife should be more objectively reviewed.

NPS should consider allowing PWC access to all areas of PRNL shoreline except the Beaver Basin wilderness area.

In the NPS' scoping meetings announcement mailer there was a list of possible issues that could be part of the scope of regulatory analysis. Included were water quality and air quality. It is very likely that NPS has no data, or at least none that has been publically disclosed about air and water quality testing. Such data collected before the PWC regulations and again during the past five seasons when the existing regulations have been in place could provide objective information regarding PWC impacts on air and water. Without such information, and especially considering the significant advances in PWC engine technology over the past decade, NPS would only be speculating on the effectiveness of the current regulations or even the need for consideration of air and water quality as issues. Modern personal watercraft are one of the most environmentally neutral boats ever produced.

The original PWC regulations at PRNL and National Parks system wide were sparked in part by zealous advocacy groups who successfully used a national public relations campaign to drive PWC ban initiatives. As a result in over 80 NPS units where general recreational boating is permitted, PWC were banned. In no instances was any objective testing done, at any of those 80+ park units. Instead PWC were banned forever, regardless of any future technical improvements in sound levels, emission levels, etc.

Without having objective data and a context in which to evaluate the impacts of the PWC use, PWC restrictions are simply discriminatory based exclusively on the shape and style of the vessel.

NPS should consider establishing a standard review policy for all aspects of visitor use and access including PWC access.

It is acknowledged that NPS has responsibilities for management of national parks dictated by both legislation and as in the case of PRNL, even court rulings. The NPS should make regulations that specifically call for reviews of PWC in this instance so that whatever regulations are adopted, they can be more readily revised as changes in use patterns, increases or decreases of access, changes in equipment, and changes that may occur within PRNL itself. Such a review process would change the regulations from being

essentially a lifetime rule to one that reflects the current environment and visitor preferences. As a final note, there are recreational waterways elsewhere in the country that conduct such a routine revalidation of access and use regulations.

Finally, there is a moral issue not mentioned. The American Watercraft Association fails to grasp the mindset as to how NPS (plainly forced by a court order), or any other entity justifies, promotes, or adheres to blatant discrimination of one user over another. No reasonable person could conceive of NPS, or any other caretaker of public lands and waters discriminating, or imposing special rules against individuals of a certain race, ethnicity, impairment, or orientation. Ergo, if all other types of boating activity are permitted within the boundaries of PRNL, then why would low impact, environmentally friendly personal watercraft and their citizen owners be denied public access to these publically owned waters?

The American Watercraft Association supports the free and open access to all PRNL for personal watercraft in all areas where other motorized boating is permitted.

In closing, thank you for the opportunity to comment. We share the disappointment that your staff must expend valuable time and resources on adhering to the results of a frivolous lawsuit. Your expertise, and that of your staff could be better used on more critical issues I'm sure. If we can be of any further assistance, please do not hesitate to contact me directly.

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<b>Correspondence ID:</b>	185	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 00:00:00				
<b>Correspondence Type:</b>	Park Form				
<b>Correspondence:</b>	First off let me state that I don't think PWC's should have even been allowed anywhere in the PIRO. Now the problem becomes what to do? Thankfully when they were permitted it was only in a small restricted area. At this present time most PWC are cleaner and quieter than in the past. In fact most of the new 4-strokes are better than most combustion motors on pleasure craft that are allowed anywhere in PIRO. I understand that PWC can get into areas that are more difficult to get into than larger pleasure craft and could cause problems, but on the other hand I've been on chapel Beach and had difficulty walking on the beach because of beached pontoon boats which was more aggregating than PWC. My personal opinion is to not allow any boats to beach anywhere and to follow the same rules for PWC as Sleeping Bear Sand Dunes and the Apostle Island so all parks are on the same page.				

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<b>Correspondence ID:</b>	186	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Oct,29,2012 00:00:00				
<b>Correspondence Type:</b>	Letter				
<b>Correspondence:</b>	Dear Superintendent Jim Northup, Thank you for the opportunity to comment on the use of personal watercraft (PWC) in Pictured Rocks National Lakeshore. We have hiked, camped and participated in trail service trips at Pictured Rocks and we are familiar with the area. We strongly believe PWC use should be prohibited along the full length of the park within the park's 0.25- mile jurisdictional boundary. The noise of just one PWC can negatively impact the experience of all the park visitors along miles of lakeshore in just minutes. The eight other project issues listed in your October 2012 Scoping/Preliminary Draft Alternatives Brochure are each in themselves reason enough for prohibiting PWC use at Pictured Rocks but the soundscape issue is the issue with which we are most concerned. Please keep us informed with this environmental assessment.				

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<b>Correspondence ID:</b>	187	<b>Project:</b>	39835	<b>Document:</b>	50079
<b>Received:</b>	Nov,09,2012 00:00:00				
<b>Correspondence Type:</b>	Letter				
<b>Correspondence:</b>	I favor allowing PWC use on Lake Superior for the Pictures Rocks National Lakeshore. Addressing the issues concerning PWC use in PRNL. I am concerning about air, water and impact on wildlife. If these issues are not a concern for other motorized watercraft, then I see no reason to stop or limit use. PWCs are no more loud or a danger to swimmers than other motorized wildlife. Numbers of PWCs in the park are limited. The season of use is very limited ? more than other types of watercraft. In the 'season' weather impacts use more than other larger watercraft. PRNL is NOT being overrun by PWCs! I find that PWCs seem to be picked on out of 'symbolism' to be 'alone' in the forest crowd. Those people who feel threatened by PEC use in the park should be able to dictate 'use' limits for PWCs in the park. Thank you for your attention.				

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**Correspondence ID:** 188    **Project:** 39835    **Document:** 50079  
**Received:** Oct,30,2012 00:00:00  
**Correspondence Type:** Fax  
**Correspondence:** Dear Superintendent,  
I am writing regarding what I consider discrimination and intolerance against personal watercraft on Pictured Rocks National Lakeshore. PWC are designated as boats by the US Government, ie, Coast Guard. They are just as quiet and more energy efficient than other types of boats. To suggest otherwise borders on ignorance if not down right stupidity. As boats, they should be treated as any other boat.  
I ride PWC in Florida primarily but have had the pleasure of riding in every state on the east coast from Florida to and including NY along with Tennessee, Pennsylvania, Delaware, and Maryland. I am constantly amused by folks who peddle their prejudices as fact and come up with outrageous conclusions. Please approach this subject with your eyes and ears open. If you do that I trust you will come to a reasonable decision regarding this matter. Boats are boats and all should be treated the same.

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**Correspondence ID:** 189    **Project:** 39835    **Document:** 50079  
**Received:** Oct,29,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Dear Sir: I wish to record the following comments on the question of possible environmental impacts of personal watercraft (PWC) at the Pictured Rocks National Lakeshore.  
There is the potential for many undesirable impacts, both short and long term. The Lake Superior shore all along the Park is undoubtedly one of the most beautiful and varied locations in the United States. It is of interest from the point of view of its geology, its diversity of ecosystems, and its pure beauty. In addition, the visitor experience of quiet and solitude is one which should be preserved. The Park, whether along the lakeshore or inland, is highly susceptible to damage, physical as well as biological, from extensive use by human foot traffic and machine traffic. It is not a large park, as parks go, and this makes it more vulnerable. In the Scoping/Preliminary Draft alternatives brochure recently received from you in the mail, the potential impacts are listed under "Project Issues". In my view the points listed there comprise an excellent summary of the environmental dangers of PWC usage along the lakeshore. Every one of these nine points is highly significant. I could not come up with a better wording of the possible environmental impacts. It seems clear that PWC use is not appropriate in the waters off the Park.  
I have been an annual visitor to the Park for more than 30 years and am very familiar with all of its areas, both along the coast and inland, from Miner's Castle to Grand Marais. I strongly recommend that PWC use be totally prohibited in Lake Super or ad he Pictured Rocks National Lakeshore.  
Many of us recall the huge efforts made to have this Park formed, to remove this area from the environmental damage that was being inflicted on it by excessive motorized vehicle use and other activities. It would be a shame to let an increasing presence of PWC's negate those efforts by the people of Michigan and many others.

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**Correspondence ID:** 190    **Project:** 39835    **Document:** 50079  
**Received:** Nov,08,2012 00:00:00  
**Correspondence Type:** Fax  
**Correspondence:** Dear Jim:  
We have been summer residents in the Munising area for forty-two years. During this time, we have heartily supported the efforts of the NPS to preserve natural habitats, to encourage the responsible use of land and waterways, and to protect the natural environment of the Hiawatha National Forest and the Pictured Rocks Lakeshore.  
In keeping with our past support, and because we were not able to attend your recent Public Scoping Meetings, we write now to urge that the NPS take every stop possible to restrict the use of PWC along the Pictured Rocks shoreline.  
Water and air pollution from PWC engines is well documented and known to be severe. The shrill noise from the engines disturbs water foul and shore animals, as well as detracts significantly from the pristine sights and sounds of nature so coveted by hikers, bird watchers and other visitors. Easy access by PWC to the more remote shorelines would run the risk of serious pollution in those areas with little means for patrol or remediation. Other locations along the Superior shore are available where PWC enthusiasts can use their machines.  
We strongly advocate the prohibition of PWC along the entire length of the Pictured Rocks Shoreline. We think such a policy best manifests the responsible stewardship of water, air, and natural life expected of all citizens and public servants. Thank you.

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**Correspondence ID:** 191    **Project:** 39835    **Document:** 50079  
**Received:** Nov,07,2012 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Dear Mr. Northup:  
The United States Environmental Protection Agency has reviewed the scoping request for the above-mentioned project provided by the National Park Service (NPS). Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.  
Pictured Rocks National Lakeshore (the Park) is located in northern Michigan. It was established as a nationally significant lakeshore in 1966 based on its proximity to Lake Superior, scenic shoreline, and mix of transitional wildlife and plant communities. NPS proposes to evaluate the use of personal watercraft (PWC) in the Park via an Environmental Assessment (EA).  
In 2005, the Park implemented a special regulation to allow PWC use on the surface of Lake Superior within the park. PWC users were required to comply with State of Michigan regulations. In 2008, the U.S. District Court concluded that the previous EA was inadequate, but continued to allow PWC use in the Park while NPS undertook a new planning process. The forthcoming EA will evaluate whether continued use will be permitted or discontinued and how NPS will ensure protection of the Park's resources and values while offering a variety of visitor experiences consistent with the Park's General Management Plan.  
**Purpose and Need and Alternatives**  
The Draft EIS should include a definition of PWC, including which types of vehicles are included in the analysis and whether there are differences in requirements among the types of vehicles. For example, the Draft EIS should detail whether higher-impact vehicles (e.g., motorized boats) are allowed in the same locations or have different restrictions than lower-impact vehicles (e.g., canoes).  
EPA recommends the EA discuss what factors precipitated the 2005 special regulation to allow PWC within the Park. This should include whether it came due to visitor requests and whether it is addressed in the General Management Plan. EPA also recommends projected PWC use numbers be included in the Draft EA.  
The provided brochure indicates three proposed alternatives will be carried forward: 1) continued current management of PWC use, 2) expanded PWC use along the Pictured Rocks shoreline, and 3) ban PWC use within the park. The Draft EA should include alternatives removed from consideration and rationale for removal. For example, was continued PWC use with additional restrictions considered as an alternative? EPA recommends that proposed mitigation measures be explicitly outlined.  
**Impacts**  
**Water and Air Quality**  
EPA notes that discharges of gas and oil and vehicle exhaust emissions are existing impacts imposed by PWC users. The Draft EA should include current permit conditions mitigating or addressing these impacts, as well as additional proposed restrictions that could further reduce impacts to human health and the environment.  
**Wilderness and Sensitive Areas**  
EPA strongly encourages alternatives be considered that restrict PWC use adjacent to designated wilderness areas and other sensitive areas within the Park. .

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**Correspondence ID:** 192    **Project:** 39835    **Document:** 50079    **Private:** Y  
**Received:** Nov,07,2012 00:00:00  
**Correspondence Type:** Fax  
**Correspondence:** The purpose of this correspondence is to provide input in the public scoping phase for the development of a personal watercraft (PWC) environmental assessment (EA) for Pictured Rocks National Lakeshore (PRNL). I have put my recommendations for additional issues to be considered in NPS issues and alternatives in BOLD.  
Expand the PWC access areas to include both the existing PWC use areas as well as the shore line from Grand Marais southwestward to the northeastern boundary of the Beaver Basin wilderness area.  
The following summary of PWC capabilities and characteristics that have evolved since 2005 suggest that the National Park Service should expand the PWC access areas to include both the existing PWC use areas as well as the shore line from Grand Marais southwestward to the northeastern boundary of the wilderness area  
It is important to consider ' not only for this issue but throughout the scoping and EA process - the number of changes that have occurred in the PWC industry in the years since the original PRNL PWC management

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plan was initiated in 2002. Some of those changes are as follows:

- The industry has gotten smaller
  - o There are only three manufactures distributing and selling PWC in the United States as of November 2012
  - o This facilitates coordination with the manufacturers
  - o This reduced number of manufacturers is reflected by the smaller number of vessels being added to the fleet annually.
- ? The machines have gotten bigger
  - o Virtually all the PWC in 2012 are the 3-passenger machines
  - o Bigger PWC have greater range and onboard storage capacity, making them more suitable for extending voyages as well as adding versatility for uses such as camping and fishing.
- ? Over 99% of the PWC sold in the United States for the past several years have been powered by 4-stroke engines.
  - o These machines have fuel economy increased by 30% or more, giving them increased range in many cases.
- ? The number of PWC dealers in the Upper Peninsula of Michigan has decreased
  - o Possibly due in part to NPS restrictions at PRNL
- ? There has been a constant development of PWC rider apparel designed to improve rider comfort in cold water situations such as those of Lake Superior.

These changes must be factored into the development of alternative management strategies. For example, a PWC voyage from Marquette or Munising to Grand Marais or beyond is now well within the capabilities of a PWC considering their larger size and increased range. In fact comparable open water voyages are common in many other parts of the country. Another example of what changes in the PWC mean is an increase in onshore camping by PWC operators that is facilitated by the larger storage in many current PWC models mentioned above.

Also by expanding the allowable access areas beyond the present 5 miles or so of shoreline, NPS may enjoy a more dispersed use of PWC. This would have the effect of reducing the level of local impact. Further, economic benefits might accrue to the small gateway community of Grand Marais if PWC owners might subsequently drive on the newly paved H58 to Grand Marais to launch. In fact on the NPS interpretive signage there is a specific statement that the best way to see PRNL is by boat. With the proposed expanded access, PWC owners and operators could enjoy the vistas in PRNL in a manner consistent with NPS recommendations.

NPS should regulate all motorized vessels at PRNL with the same regulations.

One issue that seems to be missing from any background information about PWC issues at PRNL is use data. NPS has not disclosed any use data may have previously been collected and that might be valuable or useful in development of a reasonable and responsive management process. Here are a few examples of the types of information that would seem to be almost mandatory in development of regulations for recreational boating activities by PWC:

- ? Number of PWC excursions in PRNL waters
- ? Locations where PWC excursions start
- ? Destinations of PWC excursions
  - o Inside or outside of PRNL
  - o Other information about the excursion (camping, fishing, touring, etc.)
- o How many other vessels including other types of recreational vessels are included in the excursion
- ? Age and type of PWC
  - o Are they old technology 2-stroke or EPA 2008 compliant models
  - o Are they one, two or three-passenger designs

Where the vessel is registered

- o How frequently has the owner/operator visited PRNL
- o Where does the owner/operator live
- o How long has the owner/operator owned this vessel or any other PWC

Increase educational efforts to inform all boaters about responsible boating in PRNL.

Among other issues NPS should consider when developing recreational boating regulations and access regulations is what the majority of recognized recreational boating regulators are doing with regard to similar recreational boating or PWC issues. One of the most substantial initiatives conducted by dozens and dozens of state boating management agencies, who collectively are participants in the National Association of Boating Law Administrators, is enhanced and even mandatory boat operator education. It would seem logical when states put much effort into educational activities aimed at preserving life and property, NPS would also put forth robust boater educational efforts to aimed at preserving natural and cultural resources and mitigating visitor conflicts rather than simply to deny access to a particular design of vessel.

Increased viable boater use data would be an important element with this issue also. Without finding out who the proposed target audience is for an educational program, i.e. collecting data about PWC users, developing an education program would be difficult. Regulating all boaters with the same regulations and conducting a uniform boating access education effort would be much less difficult, which would reduce the Park Operations impact.

Discussion at the October 24, 2012, public scoping meeting indicated that there were approximately 75 PWC users in the 2012 season. Additional information was available about what law enforcement incidents



occurred with this relatively small community of users. It would seem that taking the information about typical law enforcement incidents and the underlying regulations and initiating an educational program that educated boaters about common boating related violations would be a most effective methods of addressing the list "project issues" published in the scoping meeting announcement mailer.

Developing an education outreach for addressing PWC issues would also focus on the actual heart of the project. An education program would be directed at operator behavior instead of trying to regulate behavior by regulating fiberglass. For example would automobile driving be safer, more courteous, quieter, less emissions if two door cars were prohibited? Or is automobile driving made safer by having all automobile drivers pass a test (thereby exhibiting some minimum level of learning the rules) and have adequate enforcement in those instances where behavior is outside the rules?

Therefore it is suggested that NPS establish a boater education program directed at the appropriate project objectives and regulate all motorized boating with one set of rules.

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**Correspondence ID:** 193    **Project:** 39835    **Document:** 50079

**Received:** Nov,09,2012 00:00:00

**Correspondence Type:** Letter

**Correspondence:** I am for allowing PWC (4 stroke or best technology) use on the waters of Lake Superior in the Pictured Rocks National Lake Shore.

The use of the 4 stroke technology will reduce the oil and gas that could enter the environment. 4 stroke PWCs are quiet and have a lower impact on water, air, and soundscapes than older machines.

I strenuously object to the selectiveness of the lawsuit requiring this environmental assessment. Picking PWCs as a target of this lawsuit is just the tip of the agenda. Once one type of motorized watercraft is removed from Pictured Rocks all other motorized watercraft will be in jeopardy.

I fully appreciate the need to restrict PWCs from Big and Little Beaver, Miner's, and Kingston lakes and fully support that position, but again 4 stroke PWCs should be allowed to be in the park in the waters of Lake Superior.

If this change would need enforcement, then I believe that all watercraft should be required to purchase permits to help defray the cost of enforcement. Again one type of watercraft should not be singled out for a permit.

As a Munising resident, I recreate in the park in all four seasons and the 'water' season is short and there are not many PWCs in the park. The study done a while back supports this conclusion.

As a former PWC owner, I took the rules seriously and if I did see someone disregarding them my husband and I would inform them and they would usually comply or go elsewhere farther out.

Twice while in the park on the PWC, my husband and I have aided hikers who needed water and bug spray. Numerous times we have warned kayakers of incoming weather or the cruise boat wake that was coming when kayakers were around the other side of a point or in a sea cave. All the time, the kayakers were very grateful to us.

As a kayaker who regularly cruises the shoreline of the Pictured Rocks, I have never had an incident with any PWC. I did show one family where a shipwreck was and everything was good. As a swimmer and snorkeler, I have never been approached by a PWC but have had to wave off a boat near Sand Point.

I feel that PWCs do not do any greater impact to water, air, wildlife, or cultural resources than any other motorized watercraft. In fact, I feel that 4 stroke PWCs pollute less. As for sound and pollution, I feel that the Pictured Rocks Cruise boats do far more damage.

Since PWCs do not have a prop, I feel that they are safer in many respects than other motorized watercraft.

I regard Pictured Rocks as a wonderful treasure for all people and some people enjoy seeing the 'rocks' from a PWC and this should be just as respected as any other watercraft. If there are sensitive area or times for breeding, then all motorized watercraft should be limited not just PWCs.

Again, I feel that Pictured Rocks National lakeshore Lake Superior waters should be OPEN to PWCs (4 stroke and better technology). Thank you for this opportunity