

**SLEEPING BEAR DUNES NATIONAL LAKESHORE
HAZARD TREE MANAGEMENT PLAN UPDATE
ENVIRONMENTAL ASSESSMENT
PUBLIC SCOPING COMMENT SUMMARY**

The National Park Service (NPS) at Sleeping Bear Dunes National Lakeshore (National Lakeshore) proposes to update its Hazard Tree Management Plan (HTMP) to include guidance to coordinate the National Lakeshore's responses to current and imminent tree disease epidemics.

The National Lakeshore has begun to see the effects of the region's Emerald Ash Borer and Beech Bark Disease epidemics, two tree diseases which are new to the area and which both unfortunately have very high mortality rates for the tree species that they affect. A third tree disease, Oak Wilt, has been reported nearby and is likely to appear in the National Lakeshore's forests soon. White Ash and American Beech are both abundant as large-sized canopy trees in the National Lakeshore's forests, including near several developed areas, and along roads, trails, and adjacent landowner property lines. This will mean a greatly increased hazard tree workload for the foreseeable future, as well as presenting the National Lakeshore with decisions concerning which of the available response methods will be utilized. These include procedures such as preemptively removing trees that do not yet present the usual hazard tree characteristics (in cases where they do show clear disease symptoms) to avoid dangerous tree removal situations, stump grinding, and using a vibratory blade implement to isolate the root systems of infected oak stands, in the event of Oak Wilt infections.

The NPS will prepare an Environmental Assessment (EA) with the following objectives: 1) maximize the effectiveness of the Lakeshore's hazard tree management program by preparing for an increased workload and updating operational procedures; 2) determine which of several available approaches the Lakeshore will use to best respond to hazard tree situations created by widespread, high mortality tree diseases, and 3) consider a variety of measures for hazard tree zone forest/landscape maintenance and restoration.

On January 2, 2014, a letter was mailed to 74 federal, state, and local agencies, tribes, elected officials, groups, and interested individuals asking for ideas on what issues and concerns should be considered in this planning effort. Simultaneously, the letter was placed on the park's website (nps.gov/slbe) with a link to the NPS Planning, Environment and Public Comment (PEPC) website, which allowed the public to comment electronically. On January 2, 2014, a press release was distributed electronically to the 58 media outlets in the National Lakeshore's media database. The official comment period ended on February 15, 2014.

As a result, we received a total of twelve comments: six comments from the PEPC website and six handwritten or typed letters. These comments will help to set the stage for the topics that the EA will address. Public input will continue to be invaluable in developing a plan that will make a lasting difference for the project. We thank all who commented and look forward to your comments on the EA that is expected to be available for public review this spring.

The topics addressed by these comments have been organized into four subject areas that broadly describe the nature of the contents:

Water Resources / Jurisdictional Issues: The U.S. Army Corps of Engineers (USACE) wrote to remind the National Lakeshore of their jurisdiction over several waterways and adjacent wetlands within the Park, wherein any hazard tree operations that might affect these water resources would necessitate applying for authorization from the USACE. Likewise, the Michigan Department of Environmental Quality (MDEQ) reminded the National Lakeshore that tree removal and restoration on wetlands, waterways, and dunes require state permitting.

Listed Species and other Wildlife: The U.S. Fish and Wildlife Service (USFWS) provided comments regarding species of special concern that depend on trees, primarily for nesting and roosting, and which may be affected by hazard tree removal activities. These species include the Indiana bat (endangered), northern long-eared bat (proposed as endangered), bald eagles (protected under Eagle Act and Migratory Bird Treaty Act), and various migratory bird species (protected under a Memorandum of Understanding between USFWS and NPS). As these species are likely to be found in forested areas in the National Lakeshore, and often use ash, beech, and oak trees, USFWS recommends that we take precautions to avoid affecting them, including timing tree removal activities to periods when these species are not likely to be present (October 1 to March 31), and using site-specific surveys to determine presence/absence of these organisms prior to tree felling operations. They also suggested that NPS confer with USFWS to develop these practices.

General Hazard Tree Management Plan Advice: Several commenters provided general suggestions for how to best define hazard tree “targets”. One US Forest Service (USFS) Plant Pathologist provided several literature references that may be useful in drafting a revised HTMP. An NPS Midwest Region Forest Ecologist made suggestions specific to revising the language and content of the National Lakeshore’s 2002 HTMP; among these were 1) increasing the hazard tree crew’s inspection schedule from its current spring inspection cycle to an annual schedule that would include spring, summer, and fall inspections of high priority areas, 2) revising the hazard tree inspection procedures and rating system, and 3) adopting the use of Geographic Information System databases for maintaining hazard tree treatment records.

Specific Beech Bark Disease and Oak Wilt Treatment: The NPS, USFS, MDEQ and Michigan Department of Natural Resources all provided comments on the approaches they use and/or recommend for treatment of hazard trees with Beech Bark Disease and Oak Wilt. These included a suggestion that American Beech trees with Beech Scale present should be automatically “rated high hazard requiring removal”, and special handling suggestions for the removal of Oak Wilt infected wood. Strengthening measures to prevent the introduction of Oak Wilt into the National Lakeshore by enforcing firewood movement restrictions was also recommended. Also, aggressive measures for responding to oak wilt outbreaks, if/when the disease does appear in the National Lakeshore, were recommended to protect visitors from hazard trees and to protect the health and sustainability of the forest in general by minimizing source sites that incubate the Oak Wilt fungus for new outbreaks.

Other Comments:

The Benzie County Road Commission encouraged interagency communication and cooperation in managing hazard trees along shared boundaries and roadways.

Several commenters generally supported more aggressive ash and beech hazard tree removal and proactive oak wilt measures. The Friends of Sleeping Bear Dunes specifically pointed out a need for hazard tree work along the Sleeping Bear Heritage Trail near the Dune Climb and one particular large ash tree behind the General Store in Glen Haven.

One commenter suggested that the revised HTMP include language that recognizes that hazard tree management can affect surrounding forest health, and vice-versa.

One commenter suggested that the National Lakeshore offset the cost of these projects through the sale of commercial timber and “wood products”.

One commenter expressed concern about the Asian long-horned beetle as “the next possible threat to our hardwoods,” and recommended an educational effort to raise awareness of this forest pest threat.