

KETTLES TRAIL PLAN AND ENVIRONMENTAL ASSESSMENT

PUBLIC COMMENT SUMMARY AND ERRATA

The National Park Service (NPS) at Sleeping Bear Dunes National Lakeshore (National Lakeshore) has completed the process of determining how to best provide safe public access to the southern, publicly-owned portion of the “Bow Lakes area,” while protecting adjacent private property. An environmental assessment (EA) was prepared to analyze the proposed action alternatives and their impacts on the environment.

Internal (agency) and external (public) scoping occurred prior to preparation of this EA. Internal scoping involved an interdisciplinary process to identify issues, develop a public involvement plan, identify data needs, and develop a planning process schedule. An internal scoping meeting was held on February 4, 2013, which was attended by members of the project planning team. Based on this meeting, a public involvement plan was developed that identified two stages in the process in which public comment would be solicited and considered: the public scoping stage and the public review of environmental assessment stage.

On April 15, 2013, a letter was mailed to 80 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 April 16, 2013, a press release was distributed electronically to the 58 media outlets in the National Lakeshore’s media database. The official comment period ended on May 20, 2013.

As a result, 11 comments were received from the PEPC website, six emails, and four handwritten or typed letters, for a total of 23 comments. The comments received were organized into seven broad subject areas:

- Private property and trespass
- Parking and access
- Visitor use
- Resource protection
- Planning and public involvement
- Hazards
- Other comments

A Public Scoping Comment Summary was prepared and placed on the PEPC website.

An alternatives development workshop was held at the National Lakeshore on May 14, 2013, with members of the planning team in attendance. The purpose of this workshop was to review and discuss the public comments received during public scoping, discuss issues and opportunities, identify draft alternatives, and identify the impacts of these alternatives on National Lakeshore resources, adjacent landowners, and visitors.

The EA was placed on public review for a 39-day period from May 23-June 30, 2014. A letter was mailed or emailed to 91 federal, state, and local agencies, tribes, elected officials, groups, and interested individuals. Also, a press release was distributed to park media outlets, hard copies were available for

review at the National Lakeshore Visitor Center in Empire, and the document was placed on the NPS PEPC website. Additionally, a limited number of paper copies and CDs were available upon request.

A public open house was held at the Philip A. Hart Visitor Center Auditorium on June 4, 2014 from 5:00 p.m. to 7:00 p.m. Fifteen people attended.

As a result of these public involvement activities, the National Lakeshore received 18 pieces of correspondence from the PEPC website, five typed letters from agencies (Michigan Department of Natural Resources, Michigan Department of Environmental Quality, U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service, Michigan State Historic Preservation Office) and three written or typed letters from individuals, for a total of 26. The issues raised by the public in these comments have been organized into seven subject areas that broadly describe the nature of the contents.

Only “substantive” comments are addressed in this summary. Substantive comments are defined as those that do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EA
- Question, with reasonable basis, the accuracy of environmental analysis
- Present reasonable alternatives other than those presented in the EA
- Cause changes or revisions of the proposal

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

Trailhead Access (Lanham Road):

Three commenters did not favor including parking at the end of Lanham Road, citing that it is too undeveloped and would encourage trespassing on private lands.

NPS Response: The NPS has decided to eliminate the proposed parking lot and designated public access at the end of Lanham Road and the associated accessible trail segment and overlook from the Selected Alternative. Vehicular access onto existing two-tracks will be blocked to prevent access from Lanham Road.

Naturalness:

Although most commenters were in favor of the project, they wanted to retain the natural beauty and uniqueness of the area. Adequate trail signing (but not overly signed), narrow naturally-surfaced trails, modest restroom facilities, and small gravel parking areas were mentioned as being appropriate for the area. Several commenters did not want to see paved trails in the trail system.

NPS Response: Trail signage will be limited to an amount needed to adequately guide visitors and provide interpretation of resources. Trails will be a single track primitive trail with a typical maintained trail width of three feet. The trail tread will typically consist of native soil. Universally accessible segments would include hardened natural surfaces (e.g., crushed limestone) but will not be paved. Such trails would have trail widths at least 36” wide and would be designed to reduce slopes (e.g., switchbacks, meanders) and/or provide necessary resting areas to meet ADA standards. Universally accessible trail is a small percentage (18%) of the total trail system (2.2 miles) with 0.4 miles in the south end of the system (the proposed northern segment will not be included in the Selected Alternative). The trailhead parking

area will be gravel surfaced and small, adequate for 6-8 vehicles to park and maneuver. A vault-type toilet would be constructed should demand warrant it.

Trailhead Access (Southwest Corner):

One commenter suggested moving the proposed trailhead parking near the Baatz Road-Fritz Road intersection to a site in the southeast corner of the project area, away from residential areas. Another commenter encouraged constructing an attractive restroom at the trailhead and another suggested building it with concrete to eliminate the porcupine problems incurred with other park vault toilets.

NPS Response: The Baatz Road-Fritz Road trailhead location was selected because of its ease of access off Baatz Road (access drive already present), flat topography, room for 6-8 vehicles to park and maneuver, and at a previously disturbed site. The southeast corner of the project area is heavily wooded and not as flat, requiring greater resource impacts and cost. A vault-type toilet would be constructed should demand warrant it and design would certainly consider noted pest issues.

Trespass and Vandalism on Private Lands:

Five commenters mentioned concern for impacts to private property owners from this project. There was concern that the NPS has not done an adequate job of informing visitors of the private lands north of the project area through better signing and maps. One commenter did not favor the proposed overlook at the north end of the project area, as it would overlook private lands and be “intrusive.”

NPS Response: Two-tracks and social trails would be blocked on federal land to prevent motor vehicle traffic or entry onto private lands. Signage would also be used to help reduce trespass. Site maps and brochures will clearly indicate private lands to the north and any existing references to “Bow Lakes” in the park will be removed so visitors will not be encouraged to search out the private lakes. The NPS has decided not to construct the proposed overlook at the north end of the system in the Selected Alternative, but an interpretive wayside between the two kettles on the Kettles Loop at that location may be constructed to interpret these unique geological features. The private lands to the north would be visible from this location, but this area is heavily wooded with no residences nearby.

Motor Vehicle Access:

Two commenters emphasized blocking access to motor vehicles to the proposed trail system.

NPS Response: Two-tracks and social trails would be blocked on federal land to prevent motor vehicle traffic.

Universal Access:

Three commenters expressed the desire to keep the area as natural as possible, using naturally-surfaced trails. One commenter mentioned that universally accessible hard-surfaces within the forest are unwarranted and another suggested that universally accessible trails should be limited to highly developed two-tracks. As one commenter stated, “Creating new road-like corridors to meet accessibility standards fails to meet the objectives for creating an area to experience nature in a primitive state.”

NPS Response: Universally accessible segments would include hardened natural surfaces (e.g., crushed limestone) but will not be paved. Such trails would have trail widths at least 36” wide and would be

designed to reduce slopes (e.g., switchbacks, meanders) and/or provide necessary resting areas to meet ADA standards. Universally accessible trail segments are a small percentage (18%) of the total trail system (2.2 miles) with 0.4 miles in the south end of the system (the proposed northern segment will not be included in the Selected Alternative).

Resource Concerns:

A few commenters were concerned that providing access to observation platforms at the edge of the bog (as found in Alternatives 3 and 4) would entice visitors to enter the bog, disrupting the fragile hydrology and ecology of the system. One commenter recommended no use of heavy equipment, except for parking lot construction, and another suggested that the trail system be “crafted” so that it minimizes damages to natural resources and protects the natural features.

The U.S. Environmental Protection Agency (EPA) recommended that a wetland delineation be done for all areas of disturbance to provide evidence that wetlands will not be impacted by the action. They also suggested that the NPS examine alternatives that do not impact wetlands (e.g., by modifying the path and location of trails). The EPA suggested permits and consultations from state or federal agencies may be needed for projects that involve wetlands impacts, federally listed threatened and endangered species and other rare species. They also suggested that the NPS implement best management practices (BMPs) to protect the bog and any other water resources during construction activities.

The U.S. Fish and Wildlife Service concurred with our findings in a letter dated July 25, 2014 that the proposed action is not likely to adversely affect listed species or those proposed for listing.

The Michigan State Historic Preservation Office concurred with our findings in a letter dated September 3, 2014 indicating that no historic properties are affected within the area of potential effects of this undertaking.

NPS Response:

The NPS is indeed purposefully directing visitors to the bog to foster education and provide recreational opportunities. It is expected that providing formalized trails, specific overlooks for viewing, physical barriers at overlooks and interpretive materials about this sensitive resource would discourage most visitors from accessing the bog area.

Any heavy equipment use would be limited to the parking areas and accessible trail segments. The EA includes *Appendix 1: Sustainable Trail Guidelines* that outlines in detail how trails will be designed and how final routes will be selected with full consideration of minimizing impacts to park resources.

Wetland delineations are premature at this time due to the conceptual nature of this plan, as are any permitting efforts. All areas proposed for development will be reviewed for wetland issues by trained field staff prior to final design and implementation of trails and other amenities, with a goal of avoiding direct impacts to wetlands and other water resources. Should there be any indication from field investigations during planning that impacts to wetlands may yet occur, focused wetland boundary determinations or delineations (as appropriate) would be conducted at that time. If any impacts are expected after all efforts to avoid them, the NPS would revise and update the environmental analysis as necessary and pursue appropriate permitting and mitigation measures at that time.

In the document on pages 35-36 we presented a list of 36 federal and state-listed known from Leelanau County from the Michigan Natural Features Inventory and evaluated possible impacts to those species from the proposed action. Appropriate surveys will be conducted prior to finalizing trail segments and construction, especially in those areas that leave previously disturbed two-tracks.

It is our usual practice to incorporate current construction BMPs for all phases of the project to ensure protection of resources.

Errata:

Page 5, paragraph 5:

Replace "*Ledium*" with "*Rhododendron*"

Replace "*Allium burdickii*" with "*Allium sp.*"

Replace "*purperea*" with "*purpurea*"

Replace "*Adiantum spp.*" with "*Adiantum pedatum*"

Page 34, paragraph 5:

Replace "*Adiantum sp.*" with "*Adiantum pedatum*"

Replace "*Impatiens sp.*" with "*Impatiens capensis*"

Page 34, paragraph 6:

Replace "march" with "marsh"

Replace "*Potentilla palustris*" with "*Comarum palustre*"

Page 35, paragraph 6:

Replace "NRFI" with "MNFI" (two instances)

Page 36, Table 3:

Replace "*Bercula*" with "*Berula*".