

National Park Service  
U.S. Department of the Interior

Sleeping Bear Dunes National Lakeshore  
Empire, Michigan



## Platte River Mouth Restoration and Access Plan Environmental Assessment

### *Public Scoping Comment Analysis Report*



Prepared for:  
National Park Service

Prepared by:  
Vireo, Olsson Associates  
SFS Architecture

January 22, 2016

This page is intentionally blank

# Contents

INTRODUCTION .....	1
COMMENT ANALYSIS PROCESS .....	1
DEFINTION OF TERMS .....	2
GUIDE TO THIS DOCUMENT.....	3
NATURE OF THE COMMENTS RECEIVED .....	3
CONTENT ANALYSIS REPORT .....	4
PUBLIC SCOPING COMMENT SUMMARY .....	6

## List of Tables

Table 1:	Correspondence Distribution by Substantive Code.....	4
Table 2:	Correspondence Distribution by Non-substantive Code.....	5
Table2:	Correspondence Signature by Organization Type.....	5
Table 3:	Correspondence Distribution by Correspondence Type.....	5
Table 4:	Correspondence Distribution by State.....	5

## APPENDIX State and Federal Agency Correspondence Received

Michigan Department of Environmental Quality

Michigan Department of Natural Resources – Parks and Recreation Division

US Fish and Wildlife Service

US Environmental Protection Agency

This page is intentionally blank

## INTRODUCTION

Public scoping is the process by which public input is sought on the scope of issues and alternatives to be addressed in a National Environmental Policy Act (NEPA) document, such as an Environmental Assessment (EA). The process is open to the public and is conducted early in the NEPA planning process. Public scoping can include mailings and meetings to inform and educate the public on the project and the planning process guiding the preparation of an EA. It also instructs the public on how and when to provide comments on the project. At the conclusion of the public scoping comment period, correspondence received is analyzed and summarized using an established protocol.

On October 1, 2015, Sleeping Bear Dunes National Lakeshore (SLBE) released the Public Scoping Brochure for the Platte River Mouth Restoration and Access Plan EA for public review and comment. The public was invited to submit comments on the scope of the planning process and potential alternatives through November 15, 2015. During the scoping period, a public scoping meeting was held at the Philip A. Hart Visitor Center Auditorium on October 15, 2015. The meeting presented information about the project background, development of the plan, and the planning process. National Park Service (NPS) staff was on hand to answer questions and provide additional information to meeting participants. Public input was not accepted at the meeting, instead participants were directed to provide input on-line through the NPS Planning, Environment & Public Comment (PEPC) website or in writing to the SLBE Superintendent. During the scoping period, 64 pieces of correspondence were entered into the PEPC system either from direct entry by the commenter, or uploading of emails and hardcopy letters by NPS staff.

This report represents a summary of the input received. The NPS will use all of the input received, in addition to other relevant law, policy, planning documents, and scientific literature, to determine the scope of the EA.

## COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision-makers and the Platte River Mouth Restoration and Access Plan EA Team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- Developing a coding structure
- Employing a comment database for comment management
- Reading and coding of public comments

- Interpreting and analyzing the comments to identify issues and themes
- Preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondences and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

Analysis of the public comments involved the assignment of the codes to statements made by the public, organizations, and agencies in their letters, email messages, and written comment forms. All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Comments were also identified as substantive or non-substantive. Substantive comments consist of factual information about an alternative, impact, or other consideration. Substantive comments were identified and summarized into formal concern statements. Non-substantive comments consist of opinions and general support for or against a proposal or project elements. Non-substantive comments were identified and reported separately.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. The emphasis was on identifying substantive comments for further analysis, not necessarily tallying the number of times a particular comment was raised.

## DEFINITION OF TERMS

Primary terms used in the document are defined below.

**Correspondence:** A correspondence is the entire document received from a commenter. This includes letters; written comment forms; comments entered directly into PEPC; and any other written comments provided either at the public scoping meetings, by postal mail, or in person at the park.

**Comment:** A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support or opposition for an alternative, additional data regarding the existing condition, or suggestions for resource topics to be considered. Comments are considered either substantive or non-substantive, which is reflected when they are coded. Substantive comments raise, debate, or question a point of fact or policy while non-substantive comments express opinions of support or opposition.

**Code:** A code is a grouping centered on a common subject. The codes were developed during the scoping process and are used to track major subjects throughout the EA planning process. Codes are marked as either substantive or non-substantive.

**Concern:** Concerns are statements that summarize the issues identified by each code. Each code was further characterized by concern statements to provide a better focus on the content of comments. In cases where no comments were received on an issue, the code was not identified or discussed in this report.

## GUIDE TO THIS DOCUMENT

This report is organized as follows:

**Content Analysis Report** - This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section provides general demographic information, such as the states where commenters live, and the number of letters received from different categories of organizations, etc. The second section of the report provides a summary of the number of comments that were coded under each topic.

**Public Scoping Comment Summary** - This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and further organized into concern statements. Below each concern statement are representative quotes, which have been taken directly from the text of the public's comments and have not been edited. These representative quotes further clarify the concern statements.

## NATURE OF THE COMMENTS RECEIVED

During the 45 day scoping period, 64 pieces of correspondence were received from four states. Of the comments received, 81% were from unaffiliated individuals, 9% were from governmental agencies (county, state, and federal), 5% were from businesses, 3% were conservation/preservation organizations, and 1% were recreational groups. All comments received were from the United States, with most (84%) from Michigan.

The top five substantive topics that received comments were: Alternatives - Other Lake Access locations; Purpose and Need - Park Legislation/Authority; Threatened and Endangered Species

– Birds; Alternatives – Other Dredging Practices; and Visitor Conflicts and Safety – Boater Safety.

The top five non-substantive topics that received comments were all alternatives that: support recreational boat access; support riverbank restoration; oppose river dredging; support any new facilities; and oppose any new facilities.

It is important to note that all comments, regardless of their topic, were carefully read and analyzed. Commenters will continue to be notified of the project's progress and are encouraged to visit the park's planning website at <http://parkplanning.nps.gov/platte> to view information pertaining to this project.

## CONTENT ANALYSIS REPORT

Table 1. Comment Distribution by Substantive Code

Code	Description	Number of Correspondences
AL4100	Alternatives: Other Lake Access Locations	12
PN4000	Purpose And Need: Park Legislation/Authority	12
TE4100	Threatened and Endangered Species: Birds	12
AL4600	Alternatives: Other Dredging Practices	10
VS4100	Visitor Conflicts and Safety: Boater Safety	9
AE23000	Affected Environment: Visitor Conflicts	9
AE12100	Affected Environment: Fish and Fisheries	8
SE4100	Socioeconomics: Costs to NPS	8
AL4700	Alternatives: Spoils Management and Uses	7
WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives	6
VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives	6
VE4100	Visitor Experience: Scenic Values	6
AL4300	Alternatives: Other Parking Locations	5
SE4200	Socioeconomics: Local Economy	4
CC1100	Consultation and Coordination: Permitting Requirements	4
TE4200	Threatened and Endangered Species: Vegetation	4
AE12200	Affected Environment: Rivers and River Processes	4
AL4400	Alternatives: Grant Land Back to State	3
AE11000	Affected Environment: Species Of Special Concern	3
AL4000	Alternatives: New Alternatives Or Elements	3
WR4100	Water Resources: Rivers and River Processes	3
WH4100	Wildlife and Wildlife Habitat: Fish and Fisheries	2
VR4000	Vegetation And Riparian Areas: Impact Of Proposal And Alternatives	1
AQ4100	Air Quality: Construction Emissions	1
VR4100	Vegetation and Riparian Areas: Tree Removal	1
WR4200	Water Resources: Wetlands	1
AL4800	Alternatives: Mitigation and Management Plans	1
AE10000	Affected Environment: Rare Or Unusual Vegetation	1
WH4200	Wildlife and Wildlife Habitat: Invasive Species	1
VR4200	Vegetation and Riparian Areas: Research Study Plots	1
ON1200	NEPA: Conduct EIS	1
WH4300	Wildlife and Wildlife Habitat: Climate Change	1
AE12000	Affected Environment: Wildlife And Wildlife Habitat	1



Table 2. Comment Distribution by Non-substantive Code

Code	Description	Number of Correspondences
AL1100	Alternatives: Supports Recreational Boat Access	41
AL2000	Alternatives: Supports Riverbank Restoration	27
AL2300	Alternatives: Opposes River Dredging	27
AL2400	Alternatives: Supports Any New Facilities	23
AL2500	Alternatives: Opposes Any New Facilities	22
AL2200	Alternatives: Supports River Dredging	14
AL2410	Alternatives: Supports New Facility at Platte Point Only	8
AL1200	Alternatives: Consistency with General Management Plan	7
AL2100	Alternatives: Opposes Riverbank Restoration	5
PO4100	Park Operations: Enforcement	3
ON1100	NEPA: Public Involvement	3
RF1000	References: General Comments	3
AL2420	Alternatives: Supports New Facility at Illinois Drive Only	3
AL2430	Alternatives: Supports New Facility at Tiesma Road Only	2
MT1100	Miscellaneous Topics: Partnerships	2
CC1000	Consultation and Coordination: General Comments	2
AL4500	Alternatives: Site Control Under NPS	1

Table 3. Correspondence Signature Count by Organization Type

Organization Type	Correspondences
Business	3
Conservation/Preservation	2
County Government	1
Federal Government	2
Recreational Groups	1
State Government	3
Unaffiliated Individual	52
<b>Total</b>	<b>64</b>

Table 4. Correspondence Distribution by Correspondence Type

Type	Correspondences
Web Form	39
Letter	20
E-mail	3
Park Form	2
<b>Total</b>	<b>64</b>

Table 5. Correspondence Distribution by State

State	Number of Correspondences
Michigan	54
Indiana	5
Ohio	3
Illinois	1
Unknown	1
<b>Total</b>	<b>64</b>

## PUBLIC SCOPING COMMENT SUMMARY

### *AE10000 - Affected Environment: Rare Or Unusual Vegetation*

**CONCERN STATEMENT:** (Concern ID: 55396) Commenters noted the presence of the Pitcher's Thistle, a state and federally listed threatened and endangered species.

**Corr. ID: 63 Organization:** Fish and Wildlife Service **Comment ID: 481895 Organization Type:** Federal Government

**Representative Quote:** Other federally listed species such as the threatened Pitcher's Thistle (*Cirsium pitcheri*) also occurs at this location.

### *AE11000 - Affected Environment: Species Of Special Concern*

**CONCERN STATEMENT:** (Concern ID: 55397) Several commenters noted the presence of Piping Plover, a federally listed threatened and endangered species.

**Corr. ID: 63 Organization:** Fish and Wildlife Service **Comment ID: 480309 Organization Type:** Federal Government

**Representative Quote:** The mouth of the Platte River and adjacent beach and dune areas are important habitats for many sensitive species of wildlife and plants, including several federally or state listed species. This location has been one of the most important and consistent breeding sites for the critically endangered Great Lakes Piping Plover, (*Charadrius melodus*) with nests occurring each season since 1995. In some years the plovers breeding at the Platte River Mouth and adjacent areas have comprised as much as 20% of the entire breeding population (11 out of 55 breeding pairs in 2011). The project area is also located with UnitMI-16 of the federally designated Critical Habitat for Great Lakes Piping Plover.

The federally threatened rufa Red Knot subspecies (*Calidris canutus rufa*) does not breed in the Great Lakes but could potentially use the beaches in the vicinity of the project area for migratory stopover locations in spring and fall. Each of these species, and their designated Critical Habitat, should be considered in the evaluation of project alternatives.

### *AE12000 - Affected Environment: Wildlife And Wildlife Habitat*

**CONCERN STATEMENT:** (Concern ID: 55398) Commenter noted the presence of sensitive species in relation to past restoration efforts by NPS.

**Corr. ID: 39 Organization:** *Not Specified* **Comment ID: 480466 Organization Type:** Unaffiliated Individual

**Representative Quote:** Environmentally the proposals directly contradict the NPS efforts of the last 46 years to restore this area to its current 'natural' state. The fore-dunes areas have been recovering from the impacts to remove houses, roads, powerlines, ATV and motorized access etc. It would be a terrible reversal of NPS efforts to now install a boat launch and parking area to this 'scenic recovered area'

There is also the issue of the piping plover, pitcher thistle and fore-dune recovery. The proposed alternatives are directly in the very area that the NPS has very diligently, and with great effort and expense, tried to promote the recovery of these species.

#### ***AE12100 - Affected Environment: Fish and Fisheries***

**CONCERN STATEMENT:** (Concern ID: 55399) Commenters noted the history of salmon fishing and dredging within the Platte River. Several commenters expressed concern about the future of salmon fishing within the river in regards to number of fish and accessibility.

**Corr. ID: 13 Organization:** *Not Specified* **Comment ID:** 480168 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Historical agreements, signed by both Michigan Department of National Resources (MDNR) and the National Park Service (NPS) call for cooperation and mutual support of the fisheries and fishing on public waters within the park's property, by both the National Park Service and the Michigan Department of National Resources.

**Corr. ID: 44 Organization:** *Not Specified* **Comment ID:** 480274 **Organization Type:** Unaffiliated Individual

**Representative Quote:** According to the Michigan DNR's, Lake Michigan Fishery Update (released this year) the salmon population is down about 75% from the 2012 peak. The decline is attributed to two factors; 1) The DNR has reduced stocking rates since 1999, 2) Natural reproduction has declined substantially since 2013 because there is less prey in the lake. Alewives, the salmon's primary prey, have been on the decline since the mid-90s because they are competing for food with invasive zebra and quagga mussels.

#### ***AE12200 - Affected Environment: Rivers and River Processes***

**CONCERN STATEMENT:** (Concern ID: 55401) Commenters noted the changing nature of the river and expressed the importance of the NPS in preserving the integrity of this resource.

**Corr. ID: 5 Organization:** *Not Specified* **Comment ID:** 480127 **Organization Type:** Unaffiliated Individual

**Representative Quote:** This portion of the Platte River is listed on the Nationwide Rivers Inventory. Impacts to the river's ORVs, free flow and water quality from dredging should be evaluated (past/present).

**Corr. ID: 45 Organization:** *Not Specified* **Comment ID:** 481865 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Aerial photos taken over the last 60 plus years prove there is substantial negative impact to the natural shoreline caused by dredging.

#### ***AE23000 - Affected Environment: Visitor Conflicts***

**CONCERN STATEMENT:** (Concern ID: 55515) Commenters expressed concern about conflicts resulting from the varied use and management of the Platte River Point area.

**Corr. ID: 5 Organization:** *Not Specified* **Comment ID:** 480130 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The Platte River is overcrowded with use (from what staff and visitors have said, and my own observations of crowds/fights/trash on site). This is a dangerous situation- -

allowing motorboats to operate up/down a flowing river channel when there are kids playing in the water at the mouth, often without adults nearby, is not safe.

**Corr. ID: 18 Organization:** *Not Specified* **Comment ID:** 480198 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Platte Bay has been almost unfishable in recent years due to the lack of dredging activity. That makes it unsafe to attempt to navigate the mouth. I have personally seen several boats swamped while trying to re-enter the river with no channel markers, and was in my father's boat this year when we were fishing until right after dark and we beached out boat on accident because there were no channel marker buoys in place - the markers that are traditionally put in place by the dredger. There was also a rock dam built this summer that made things harder for anglers to get around/through with boats.

**Corr. ID: 20 Organization:** *Not Specified* **Comment ID:** 480207 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The one major problem with any launch site in the bay is that there are a tremendous amount of tourists that take up all the parking spots for a boat and trailer. If you are going to fish in the evening then you have to wait until most of the tourists leave for dinner which is usually around 7pm or later making your trip out fishing very short.

#### ***AL4000 - Alternatives: New Alternatives Or Elements***

**CONCERN STATEMENT:** (Concern ID: 55402) Commenters recommended new elements to consider in the plan that included such things as harbor safety features and pervious pavers for parking areas.

**Corr. ID: 14 Organization:** *Not Specified* **Comment ID:** 480214 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Ideas:

- 1-Construct a harbor at Platte River Point or Empire with NP, Federal and State assistance in funding.
- 2-Construct a stone or steel jetty at the mouth of the Platte River into Lake Michigan to keep the mouth of the river deeper.
- 3-Pump Lake Michigan water into the Platte River to increase water depth at the mouth. This would be done at predetermined dates and times. This is done on the Gauley River in West Virginia for rafters.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480636 **Organization Type:** Federal Government

**Representative Quote:** EPA recommends that NPS commit to the use of permeable pavement or permeable pavers in areas proposed for parking areas or other permanent hardscaped areas. The use of permeable pavement, with associated public education signage at the parking lot site(s), would add value to the National Lakeshore and have a secondary benefit of providing water infiltration rather than runoff into Lake Michigan.

#### ***AL4100 - Alternatives: Other Lake Access Locations***

**CONCERN STATEMENT:** (Concern ID: 55403) Several commenters recommended use of past or present lake access locations outside of this area of the park to provide direct access to Lake Michigan without the need for developing additional facilities at this location.

**Corr. ID: 39 Organization:** *Not Specified* **Comment ID:** 480474 **Organization Type:** Unaffiliated Individual

**Representative Quote:** There is a well protected harbor in Frankfort that is accessible to Platte Bay for fisherman. It is 10 miles distance from the river via Lake Michigan. Empire has a boat launching ramp at a distance of 6 miles to the Platte River. The Benzie launch site is on the river and fisherman can access the river with small boats if they so desire. Why does a fourth facility even need to be considered for a fishery that may not be sustained for 'future generations'?

**Corr. ID: 58 Organization:** *Not Specified* **Comment ID:** 480300 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Boat travel between the present launch site and Lake Michigan is not possible for everyone, and it should not be the responsibility of SBDNL to make it so. Vessels too large to navigate this section due to the river's natural limitations of depth and width need to use alternative launch facilities at Frankfort or Empire.

**Corr. ID: 63 Organization:** Fish and Wildlife Service **Comment ID:** 480313 **Organization Type:** Federal Government

**Representative Quote:** We recommend that SLBE consider an additional alternative that includes the development of access at the end of Esch Road. This location would be outside Great Lakes Piping Plover critical habitat and away from current plover nesting areas. This location also has fewer Pitcher's Thistle plants.

#### ***AL4300 - Alternatives: Other Parking Locations***

**CONCERN STATEMENT:** (Concern ID: 55404) Commenters expressed concern about parking lot size and locations especially in relation to the existing facilities at Platte River Point.

**Corr. ID: 42 Organization:** Riverside Canoe Trips **Comment ID:** 480271 **Organization Type:** Business

**Representative Quote:** We would prefer alternative number 3. However we would like to see additional parking provided for the safety of the people (more than 30). The ones specifically that I am talking about are those walking along Lake Michigan Road a long distance. At some point someone will end up getting hurt. It would allow beach access closer to the desired location.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480631 **Organization Type:** Federal Government

**Representative Quote:** The Draft EA should discuss why the proposed parking area is located in its currently proposed location. EPA recommends that the Draft EA also study an alternative location for a parking area for Alternative 3 closer to existing parking areas.

***AL4400 - Alternatives: Grant Land Back to State***

**CONCERN STATEMENT:** (Concern ID: 55405) Commenters expressed a desire for the park, or part of the park, be returned to the State of Michigan because they do not feel that the NPS is meeting their obligations.

**Corr. ID: 13 Organization:** *Not Specified* **Comment ID:** 480169 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As part of these understandings we believe the NPS is obligated to facilitate safe access to the Platte and other waters within the park for fishing and boating purposes. We believe that if the park fails to do that the State of Michigan has the right to rescind property transfer documents involving some 3,000 acres of land and adjacent Platte River waters deeded by the state during the formation of the park.

**Corr. ID: 31 Organization:** *Not Specified* **Comment ID:** 481807 **Organization Type:** Unaffiliated Individual

**Representative Quote:** If the National Park is not willing to meet its commitment (dredging the mouth of the Platte River) to the State of Michigan, the Michigan DNR and the people who use the access, then the National Park should give the land back to the State of Michigan.

***AL4600 - Alternatives: Other Dredging Practices***

**CONCERN STATEMENT:** (Concern ID: 55406) Several commenters noted the desire for continued dredging of the river until an alternative is developed.

**Corr. ID: 13 Organization:** *Not Specified* **Comment ID:** 480176 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As a resident of Benzie County, and as the President of the Benzie Fishery Coalition, speaking in behalf of hundreds of licensed salmon fishermen who live in or travel to Benzie County, we support a long term solution other than the Platte River for access to Platte Bay, and continuous dredging of the river mouth each fall, until another means of safe access is made available

***AL4700 - Alternatives: Spoils Management and Uses***

**CONCERN STATEMENT:** (Concern ID: 55407) Commenters provided suggestions for alternative management and use of the river dredge spoils and noted the importance of management occurring outside of the Piping Plover nesting season.

**Corr. ID: 43 Organization:** Riverside Canoe Trips **Comment ID:** 480503 **Organization Type:** Business

**Representative Quote:** I do think that if dredging continued the park could be more sensitive to the spoil management. Either by trucking it out, or allowing the river to wash it away. This may be the easiest answer to an otherwise complicated dilemma.

**Corr. ID: 48 Organization:** *Not Specified* **Comment ID:** 480284 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Option 2 as described in the detailed analysis (off-shore disposal of dredge spoils) would come second as long as the dredging and disposal is done outside of the Piping Plover nesting season.

#### ***AL4800 - Alternatives: Mitigation and Management Plans***

**CONCERN STATEMENT:** (Concern ID: 55516) Commenters suggested various mitigation and management plans should be part of the alternatives discussion.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480655 **Organization Type:** Federal Government

**Representative Quote:** We also recommend that a monitoring and maintenance plan be developed and included in the NEPA analysis, including quantifiable and measureable success criteria for the restoration work (e.g., goal of 85 percent native aquatic and terrestrial species), and the duration of the monitoring period(s) and rationale for selecting the monitoring time period. A discussion of monitoring plan key features would be useful to the reviewer to understand what NPS envisions as measures of success.

Open-water restoration efforts undertaken by several U.S. Army Corps of Engineers districts in the Great Lakes basin have utilized the Lacustrine Qualitative Habitat Evaluation metrics method to score potential restoration sites. EPA supports the use of qualitative metrics to score both baseline and restoration conditions. In the Draft EA, please provide narrative information on the type of proposed metric(s) to be utilized for management/monitoring. EPA recommends that baseline measurements be taken and utilized for comparison during monitoring.

EPA also suggests that the forthcoming draft NEPA documentation identify the aquatic and terrestrial noxious weeds/invasive species found near the project area<sup>2</sup>. Early recognition and control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have more adverse impacts on biodiversity and nearby water quality. We recommend that the NEPA documentation include aquatic and terrestrial invasive management plans that address identification and control of noxious weed/invasive species in and near the project area during construction and perhaps, more importantly, a boater education program to reduce the spread of aquatic invasives in the waterbody.

Because there are many unknowns regarding these types of project features (vegetation), we recommend a typical adaptive management plan (AMP) for this type of project be included with the Draft EA. The plan could include a description of actions to be initiated when NPS determines that proposed revegetation actions are not progressing as desired. The AMP should include triggers that would invoke the AMP, along with specific actions and timelines for adaptive actions.

#### ***AQ4100 - Air Quality: Construction Emissions***

**CONCERN STATEMENT:** (Concern ID: 55517) Commenters suggested that impacts to air quality during dredging operations were a concern and should be mitigated.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480647 **Organization Type:** Federal Government

**Representative Quote:** Although every project is unique, common actions can reduce worker and Park user exposure to diesel exhaust as well as reduce air impacts. EPA strongly recommends that



the forthcoming NEPA documentation be revised to include the diesel emissions reductions stated below, as applicable, and commit to these reductions in the decision document.

Using low-sulfur diesel fuel (less than 0.05% sulfur)

- Retrofitting engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Positioning the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed.
- Using catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Using enclosed, climate-controlled cabs pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Regularly maintaining diesel engines, which is essential to keeping exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Reducing exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Purchasing new vehicles that are equipped with the most advanced emission control systems available.
- With older vehicles, using electric starting aids such as block heaters to warm the engine reduces diesel emissions.

#### ***CC1100 - Consultation and Coordination: Permitting Requirements***

**CONCERN STATEMENT:** (Concern ID: 55408) Commenters noted the need for agency coordination and provided a list of many of the potential permits that could be required for project implementation.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480657 **Organization Type:** Federal Government

**Representative Quote:** Based on this information, EPA recommends a comprehensive list of permits that would be required for the selected alternative be included in the Draft EA. Specifically, the Draft EA should discuss the need for U.S. Army Corps of Engineers Clean Water Act Section 404 permits, U.S. Army Corps of Engineers Section 10 (Rivers and Harbors Act) permits, Coastal Zone Consistency Review/Permits, sediment and erosion control permits, septic permits, etc.

**Corr. ID: 62 Organization:** Michigan Department of Environmental Quality **Comment ID:** 480306 **Organization Type:** State Government

**Representative Quote:** In development of the EA and your planning process, we request that you consider that various permits from the state could potentially be required for these activities, including, but not limited to, permits under Part 301, Inland Lakes and Streams; Part 303, Wetlands Protection; Part 325, Great Lakes Submerged Lands; and Part 353, Sand Dunes Protection and Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The DEQ cannot comment further without specific details of the boat access, riverbank work, and other earth moving and associated activities.



The DEQ recommends that you consider early coordination of the permit procedure by utilizing the preapplication process.

**ON1200 - NEPA: Conduct EIS**

**CONCERN STATEMENT:** (Concern ID: 55451) Commenter suggested the study require an EIS to address impacts of the proposed alternatives.

**Corr. ID: 38 Organization:** *Not Specified* **Comment ID:** 480261 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Consideration for the impact of changes to any Platte River plans for easy access to Lake Michigan should require a complete Environmental Impact Statement not just an Environmental Assessment.

**PN4000 - Purpose And Need: Park Legislation/Authority**

**CONCERN STATEMENT:** (Concern ID: 55411) Some commenters express concerns regarding the NPS and their responsibility to manage the natural resources within the park and their responsibilities to the agreement with the State of Michigan for the Platte River mouth.

**Corr. ID: 19 Organization:** *Not Specified* **Comment ID:** 480204 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Platte River and the access to it is a unique prime recreational site that is not found elsewhere in the area. While I do not fish, I understand, as a conservationist, the importance of dredging and the obligation to do so which is endemic upon the National Park Service to keep recreational access open. It is my understanding that when the NPS was granted the Platte River area by the state, that it agreed to keep access open and assume the responsibilities once handled by the Michigan Department of Natural Resources. Apparently, this agreement is not being honored by the National Park Service, based upon my own observations of the channel in question this summer.

**Corr. ID: 54 Organization:** Michigan Committee for Water Conservation **Comment ID:** 480295 **Organization Type:** Conservation/Preservation

**Representative Quote:** Our rationale is that the Sleeping Bear National Park's primary purpose is to preserve only the natural features of the landscape.

**SE4100 - Socioeconomics: Costs to NPS**

**CONCERN STATEMENT:** (Concern ID: 55518) Commenters expressed concern about the high costs of construction and future management of alternative access locations.

**Corr. ID: 21 Organization:** *Not Specified* **Comment ID:** 480210 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Alternatives 3-5 would incur large expenses upfront to remove trees, widen and cover roads, prepare and pave parking lots, build boat ramps and rest rooms, etc., as well as considerable future costs to maintain these new facilities and structures.

**Corr. ID: 30 Organization:** *Not Specified* **Comment ID:** 480238 **Organization Type:** Unaffiliated Individual

**Representative Quote:** It is undeniable that Alternatives 3, 4 and 5 in the Platte River Mouth Restoration and Access Plan would be costly, both now and in the future, in terms of money and likely impact on the environment (pipng plover habitats, natural ground vegetation, forested areas, etc.).

***SE4200 - Socioeconomics: Local Economy***

**CONCERN STATEMENT:** (Concern ID: 55519) Commenters expressed concerns about impacts to businesses and the local economy resulting from changes in boat access.

**Corr. ID: 4 Organization:** Big Bob's Up North Outfitters/Tiny Bubbles Charters **Comment ID:** 480152 **Organization Type:** Business

**Representative Quote:** Businesses such as ours, Empire Outdoors\*, Riverside Canoes\*, Honor Trading Post\*, TAG Limit Outdoors\*, Stapleton's Corner Store\*, Backcast Fly Shop\* and many more rely on the Great Lakes Fishery as a means of sustainable income for our families. Additionally, recreational anglers bring millions of dollars each year to all of our local businesses, not just those specializing in outdoor recreation.

**Corr. ID: 16 Organization:** *Not Specified* **Comment ID:** 480193 **Organization Type:** Unaffiliated Individual

**Representative Quote:** As a retiree I live in the Benzonia community six months per year and spent locally thousands of dollars this past year on a new boat and house trailer. If I cannot have safe access to the east Platte Bay fishery, my desire to spend time and money is greatly diminished

***TE4100 - Threatened and Endangered Species: Birds***

**CONCERN STATEMENT:** (Concern ID: 55412) Commenters expressed concern about potential impacts to Critical Piping Plover Habitat and nest sites from the proposed alternatives.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480639 **Organization Type:** Federal Government

**Representative Quote:** The Draft EA should explain how each alternative proposes avoidance and minimization of impact to the endangered Piping Plover from increased levels of disturbance from beach use from construction equipment, recreational boaters, people, and domestic pets. EPA recommends coordination with USFWS regarding avoidance and minimization be included in the NEPA documentation and committed to in any decision document.

**Corr. ID: 63 Organization:** Fish and Wildlife Service **Comment ID:** 480310 **Organization Type:** Federal Government

**Representative Quote:** Under current conditions, Platte Point itself has heavy recreational pressure as thousands of people visit the location each nesting season. Great Lakes Piping Plovers nest on either side of the river mouth with a pair of plovers sometimes nesting on the dredge spoil area itself. Although SLBE staff currently close sections of the beach, set up nesting exclosures and monitor Great Lakes Piping Plovers at this location, this does not entirely alleviate negative impacts on piping plovers from the heavy recreational use at Platte Point due to violations of closed areas, and the fact that adult plovers and chicks can leave the closed areas soon after hatching. Sensitive plant species, such as Pitcher's Thistle can also be impacted by trampling in high use areas. Continuing to dredge the Platte River and place dredge spoils on the eastern bank would continue to

alter natural processes at Platte Point that may lead to further stabilization of the dune system here. This could lead to increased vegetation of the dunes and beach that could eventually leave much of the area unsuitable for Great Lakes Piping Plovers and sensitive dune plants.

***TE4200 - Threatened and Endangered Species: Vegetation***

**CONCERN STATEMENT:** (Concern ID: 55413) Commenters are concerned with potential impacts to the threatened Pitcher's Thistle within the proposed alternatives.

**Corr. ID: 14 Organization:** *Not Specified* **Comment ID:** 480186 **Organization Type:** Unaffiliated Individual

**Representative Quote:** It is not in the best public interest to have major construction of a boat ramp and parking area in a State mandated Critical Dune Area with endangered plants and animals.

**Corr. ID: 63 Organization:** Fish and Wildlife Service **Comment ID:** 480312 **Organization Type:** Federal Government

**Representative Quote:** Alternatives 3-5 all call for new recreational boat access in other nearby locations within Great Lakes Piping Plover critical habitat, including at Platte Point east of the river mouth, at Illinois Drive, or at Tiesma Road. All three alternatives would also involve removal of the current dredge spoil pile and restoration of the eastern bank of the Platte River. Each of these three alternatives, but especially alternatives 4 and 5, would involve new construction within Great Lakes Piping Plover critical habitat. Alternatives 4 and 5 would likely require construction of new parking facilities and possibly paved roads to allow for greater access at these locations. This could allow for increased recreation pressure onto the beaches east of Platte Point where Piping Plovers breed and where, under current conditions, piping plovers experience less recreation pressure than at Platte Point itself. Potential impacts to Piping Plovers, Piping Plover critical habitat, and Pitcher's thistle resulting from habitat alterations as well as increased recreation pressure, should be fully evaluated for each of these alternatives. Should an alternative be further developed that includes permanent structures along the shoreline within Piping Plover critical habitat, we recommend modeling how near shore processes may change as a result of the structure.

***VE4100 - Visitor Experience: Scenic Values***

**CONCERN STATEMENT:** (Concern ID: 55520) Commenters expressed concern about impacts to scenic values resulting from the new boat access locations.

**Corr. ID: 34 Organization:** *Not Specified* **Comment ID:** 480249 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I urge you to avoid any alternative which punches through new developed access points along the coast. New parking lots, launches and related facilities take a toll on habitat and the natural values of the shoreline and that sort of impact should be kept consolidated at Platte Point. They also spoil the coastline for users who value beach walking, bird watching, hiking and quiet enjoyment in the park.

#### ***VR4000 - Vegetation And Riparian Areas: Impact Of Proposal And Alternatives***

**CONCERN STATEMENT:** (Concern ID: 55414) Commenters express the need for more information on potential impacts to the shoreline and vegetation by the proposed alternatives.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480625 **Organization Type:** Federal Government

**Representative Quote:** The Draft EA should explain the connections between greater flexibility with a removal boat ramp, shifts in shoreline topography, and impacts to wooded upland. We recommend NPS explain what is meant by "shifts in shoreline topography and/or lake water levels" and how those anticipated shifts might impact location of the boat ramp in conjunction with impacts to wooded upland due to the need for a new access road.

#### ***VR4100 - Vegetation and Riparian Areas: Tree Removal***

**CONCERN STATEMENT:** (Concern ID: 55415) Commenter recommends agency coordination for tree removal and discussion of forest fragmentation.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480651 **Organization Type:** Federal Government

**Representative Quote:** EPA recommends that the Draft EA include information on current vegetation (e.g., native/non-native, species, etc.), the numbers or acres of trees that would be removed for each alternative, whether NPS is considering tree mitigation, and how trees will be disposed of. EPA strongly recommends that any vegetation not be burned, as burning vegetation increases air impacts, but instead mulch woody vegetation for use in the Park and/or by the community in yards, parks, commercial areas, etc.

EPA also recommends coordination with MDEQ and Michigan Department of Natural Resources regarding seasonal restrictions (e.g., removal of woody vegetation during winter months (October 1 through March 31), to the extent feasible, to avoid damage to migratory birds protected under the Migratory Bird Treaty Act; and in-water work restriction dates for fish species). We recommend these timeframes become a commitment in the decision document.

Lastly, the forthcoming Draft EA should discuss how fragmentation of the wooded area shown in Figures 8, 10, and 12 of the Final Report might impact migratory bird usage of this wooded area.

#### ***VR4200 - Vegetation and Riparian Areas: Research Study Plots***

**CONCERN STATEMENT:** (Concern ID: 55416) Commenter suggested consideration of potential impacts of proposed alternatives on existing vegetation research plots.

**Corr. ID: 21 Organization:** *Not Specified* **Comment ID:** 480212 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I didn't see mention of the ecological studies currently being done on Tiesma Road by Dr. Kerri Crawford on native grasses and other natural vegetation. If these studies are long-term they should also be considered, as should the effect new development and higher usage would have on this fragile vegetation.

#### ***VS4000 - Visitor Conflicts And Safety: Impact Of Proposal And Alternatives***

**CONCERN STATEMENT:** (Concern ID: 55417) Several commenters noted concern regarding safety for all recreationists and the need to minimize conflicts.

**Corr. ID: 40 Organization:** *Not Specified* **Comment ID:** 480492 **Organization Type:** Unaffiliated Individual

**Representative Quote:** While recreational canoes, kayaks and tubers crowd the river and mouth from late May to early September, the existing launch ramp is minimally used by fishermen during this time. If safety and conflict of recreational users and power craft is of concern, consideration may be given to requiring recreational users to exit at the commercially designated exit point for Riverside and The Trading Post customers. Simple signage alerting adults and children that re-entry down river is at their own risk as it is shared by power craft, instructing swimmers to stay above water and to move aside when any power craft is approaching. That should serve to significantly reduce the chances of any conflict. Signage could again be placed just past the launch ramp to alert parents and others in the river.

**Corr. ID: 55 Organization:** *Not Specified* **Comment ID:** 480521 **Organization Type:** Unaffiliated Individual

**Representative Quote:** However, a launch facility near the mouth of the Platte River would serve a large number of varied users and for a much longer period of time, virtually peak summer season and the "shoulder" seasons. The supporting parking would separate boat/trailer users from most other users especially in the late summer and early fall when salmon season is at the peak. It would reduce the potentially unsafe, overflow parking on Lake Michigan Road on any given busy day. Park users should expect safe parking as a part of their park user fee, so give the safest parking possible. This launch facility, of course, addresses not only this safer parking issue but also safe ingress and egress at Lake Michigan in the spring, summer and fall. It send a clear message that the NPS is willing to work with and provide for quality recreational opportunities, not only on the land of Sleeping Bear but upon the actual lake shore and its near offshore waters.

#### ***VS4100 - Visitor Conflicts and Safety: Boater Safety***

**CONCERN STATEMENT:** (Concern ID: 55418) Commenters expressed concerns about the need for providing safe access for boaters to Lake Michigan.

**Corr. ID: 40 Organization:** *Not Specified* **Comment ID:** 480487 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Alternative 2 poses a significant risk to those fishermen who utilize the existing launch ramp and to those who fish Platte Bay by traveling from launch ramps in Frankfort or Empire. A point of quick exit is needed in the area. By no longer dredging, power craft will be unable to get off the Lake quickly in the event of a storm or an emergency. There is no justifiable reason to remove the present spoils. The winds will eventually remove the sand piles, eliminating the cost to load and relocate these spoils. Let nature take its course, if that is what is to be. From a simple safety standpoint, I am against Alternative 2.

***WH4000 - Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives***

**CONCERN STATEMENT:** (Concern ID: 55419) Commenters noted the dynamic nature of the dune ecosystem and recommend that the selected plan minimize impacts to wildlife and habitats present.

**Corr. ID: 14 Organization:** *Not Specified* **Comment ID:** 480184 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Any plan should benefit all boaters with minor impact on animal, vegetation and the beauty of Platte Bay and River.

**Corr. ID: 39 Organization:** *Not Specified* **Comment ID:** 480471 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The five proposed areas are all within what is the dynamic fore-dune ecosystem. This area is comprised of water, beach, grasses, sand and one hell of a lot of wind! Not just a breeze now and again, but gales that rage for days on end, of seas that pound the areas, sand that piles up in feet, not inches, and dunes that actually move around days at a time. Each and every one of these elements influences what the others do on a daily, weekly, monthly and decades long basis. This is not a stable environment that stays in place.

***WH4100 - Wildlife and Wildlife Habitat: Fish and Fisheries***

**CONCERN STATEMENT:** (Concern ID: 55420) Commenter recommends a discussion on short-term and long-term restoration goals along with how restoration will be measured.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480560 **Organization Type:** Federal Government

**Representative Quote:** EPA recommends the forthcoming Draft Environmental Assessment (Draft EA) include current baseline information concerning the Platte River and beaches to the east and to the south of the bay. Specifically, what indicators (e.g., aquatic wildlife, vegetative, terrestrial wildlife, etc.) will be selected to measure restoration of natural conditions/processes? What are the short-term/long-term goals for restoration of the selected indicators? The Draft EA should clearly discuss how each alternative will increase habitat quality and affect chosen indicators, in addition to the overall criteria used by NPS to evaluate alternatives and to select a preferred alternative.

***WH4200 - Wildlife and Wildlife Habitat: Invasive Species***

**CONCERN STATEMENT:** (Concern ID: 55421) Commenter expressed concern about the viability of the current salmon fishery in light of problems with other invasive species.

**Corr. ID: 39 Organization:** *Not Specified* **Comment ID:** 480469 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Is the current fishery viable in Lake Michigan in the next couple of decades and does it warrant an NPS commitment of resource development? The NPS planners need to read scientific papers related to the impacts of invasive species to the Great Lakes. SPECIAL ATTENTION SHOULD BE DIRECTED TO THE IMPACT OF THE QUAHHA MUSSEL INVASION WITHIN LAKE MICHIGAN. This mussel seems to be the 'new' fact of life to the Great Lakes. It's impact is just beginning to be felt and the science is just now catching up. There is a near consensus that this species is devouring the plankton as a food source within the Great Lakes and the



impacts will certainly be felt in the fishery to a great extent. (Nearly all of the charter fisherman along the western shoreline of Lake Michigan can and will attest to that fact). This mussel is a serious threat to the entire Great Lakes Basin.

***WH4300 - Wildlife and Wildlife Habitat: Climate Change***

**CONCERN STATEMENT:** (Concern ID: 55422) Commenter recommends a discussion of how climate changes are expected to impact wildlife habitats and how the impacts may be mitigated.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480656 **Organization Type:** Federal Government

**Representative Quote:** Based on this information, EPA recommends the following information be added to the forthcoming Draft EA:

- a) A summary discussion of climate change and reasonably-foreseeable climate change impacts relevant to the project, based on U.S. Global Change Research Program<sup>5</sup> assessments. This summary discussion would assist with identification of potential project impacts that may be exacerbated by climate change and inform consideration of measures to adapt to climate change impacts. This effort will assist in identifying resilience-related changes to the preferred alternative that should be evaluated and considered as part of the proposed project;
- b) An estimation of GHG emissions associated with all project alternatives. Example tools for estimating and quantifying GHG emissions can be found on CEQ's NEPA.gov website. For actions that are likely to have less than 25,000 metric tons of CO<sub>2</sub>-e emissions/year, providing a qualitative estimate is acceptable, unless quantification is easily accomplished. The estimated GHG emissions can serve as a reasonable proxy for climate change impacts when comparing the proposal and alternatives. In disclosing the potential impacts of the proposal and reasonable alternatives, consideration should be given to whether and to what extent the impacts may be exacerbated by expected climate change in the project area, as discussed in the "affected environment" sections;
- c) Measures to reduce GHG emissions associated with the proposed project, including reasonable alternatives or other practicable mitigation opportunities. Disclose the estimated GHG reductions associated with such measures. Any commitments to implement reasonable mitigation measures that will reduce or eliminate project-related GHG emissions should be committed to in the decision document; and
- d) A discussion on adaptation and, as appropriate, practicable changes to the alternatives to make them more resilient to anticipated climate change.

***WR4100 - Water Resources: Rivers and River Processes***

**CONCERN STATEMENT:** (Concern ID: 55423) Commenters suggest that the study address what will happen to the river and the adjoining river banks without dredging. They also recommend better definition of river bank restoration goals.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID:** 480563 **Organization Type:** Federal Government

**Representative Quote:** The Draft EA should address whether restoration of the river bank will resemble 1938 conditions. If restoration alternatives will address only the eastern river bank, how was this restoration 'endpoint' developed? What criteria were used to determine restoration to the eastern river bank only was needed, rather than restoration to a 1938, pre-dredging condition?

**Corr. ID: 63 Organization:** Fish and Wildlife Service **Comment ID: 480311 Organization Type:** Federal Government

**Representative Quote:** Alternative 2 would end dredging at this location and remove the existing dredge spoil pile on the eastern riverbank while continuing to allow access for recreation boats via the Platte River. This alternative would allow for natural processes to be returned to the river mouth, which may result in improved habitat conditions for Great Lakes dune species. However, this alternative may eventually result in lack of recreational boating opportunities in the area if boats are no longer able to access Lake Michigan from the Platte River once dredging is discontinued.

***WR4200 - Water Resources: Wetlands***

**CONCERN STATEMENT:** (Concern ID: 55424) Commenter recommends a wetland delineation be conducted throughout the study area for proposed alternatives where potential construction impacts are proposed.

**Corr. ID: 61 Organization:** US EPA Region 5 **Comment ID: 480641 Organization Type:** Federal Government

**Representative Quote:** EPA recommends that a wetland delineation be undertaken for all locations where construction is proposed to be undertaken, including new roadways, areas of widening for existing roadways, proposed parking lots, proposed restroom areas, construction staging areas, and any areas in which sand disposal from the eastern dredge material pile may be reimbursed. The delineation should be undertaken during the growing season and be reviewed by Michigan Department of Environmental Quality (MDEQ) and the US Army Corps of Engineers (USACE).



## APPENDIX

### State and Federal Correspondence Received

This page is intentionally blank



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

November 12, 2015

Ms. Dusty Shultz, Superintendent  
United States Department of the Interior  
National Park Service  
Sleeping Bear Dunes National Lakeshore  
9922 Front Street  
Empire, Michigan 49630

Dear Ms. Shultz:

Thank you for the brochure sent to Director Dan Wyant, Department of Environmental Quality (DEQ), regarding the proposed Platte River Mouth Restoration and Access Plan Environmental Assessment (EA). Director Wyant has referred the brochure to me for response.

The potential activities noted in the brochure appear to include the construction of boat access facilities, dredging, or other earth work at or near the riverbank. In development of the EA and your planning process, we request that you consider that various permits from the state could potentially be required for these activities, including, but not limited to, permits under Part 301, Inland Lakes and Streams; Part 303, Wetlands Protection; Part 325, Great Lakes Submerged Lands; and Part 353, Sand Dunes Protection and Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The DEQ cannot comment further without specific details of the boat access, riverbank work, and other earth moving and associated activities.

The DEQ recommends that you consider early coordination of the permit procedure by utilizing the preapplication process. Information on preapplication requests and the standard application process can be found at: <http://www.michigan.gov/jointpermit>.

If you have any further questions regarding this matter, please contact Ms. Robyn Schmidt, Cadillac District Office, Water Resources Division, at 231-383-5952; [schmidtr1@michigan.gov](mailto:schmidtr1@michigan.gov); or DEQ, 120 West Chapin Street, Cadillac, Michigan 49601; or you may contact me.

Sincerely,

  
Jim Sygo  
Chief Deputy Director  
517-284-6709

cc: Mr. Dan Wyant, Director, DEQ  
Mr. Jon Allan, Director, Office of the Great Lakes, DEQ  
Mr. Bryce Feighner, DEQ  
Mr. Robert Wagner, DEQ  
Mr. William Creal, DEQ  
Ms. Robyn Schmidt, DEQ

Received by

NOV 16 2015

SL: [unclear] Room



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF NATURAL RESOURCES  
LANSING



KEITH CREAGH  
DIRECTOR

December 18, 2015

Received by

DEC 28 2015

ALBE Mailroom

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

Dear Mrs. Schultz:


This is in response to your request that the Michigan Department of Natural Resources (DNR) comments on alternatives presented at the public meeting October 15, 2015. We share the same objectives for the protection of this valuable natural resource associated with the Platte River mouth restoration and access plan.

We support the objectives as stated and amended, in your master plan. The Platte River mouth dredging has provided protected public boating access to Lake Michigan that does not exist in nearly 50 miles of shoreline. This strategically located access to Platte Bay would be difficult, to replace. The most important aspect of the current boating access to Platte Bay is the protection offered to recreational boaters in the Platte River. To duplicate this protection on the shores of Lake Michigan would require considerable infrastructure to be built (breakwaters) that would cost approximately \$4 million dollars.

In 2004, the State of Michigan met with partners and stakeholders regarding a proposal to improve the access on the Platte River at the end of Lake Michigan Road. The project closed out in 2011 and has been a major access point, the only protected access, since that time. We remain committed to providing this protected boating access to Lake Michigan and Platte Bay. We support Alternative 1, including dredging the mouth of the river to enable the access to continue. We would recommend that the dredge spoil pile management be assisted through collaboration with the U.S. Army Corps of Engineers, Detroit District.

If you have any questions, or would like further information, please contact Mr. Bill Boik, Department Manager at 517-286-6086 or e-mail at: [boikw@michigan.gov](mailto:boikw@michigan.gov).

Sincerely,

  
Ronald A. Olson, Chief  
Parks and Recreation Division  
517-284-6135

Cc: Mr. Keith Creagh, Director, DNR  
Dr. William E. Moritz, Natural Resources Deputy, DNR  
Mr. Dave White, Mackinaw City Manager  
Army Corp. of Engineers, Detroit District  
Benzie County Board of Commissioners  
Benzie County Parks and Recreation Commission  
Lake Township  
Michigan Steelhead and Salmon Fishermen's Association  
Benzie County Sport Fishermen's Association



IN REPLY REFER TO:

## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

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

December 9, 2015

Mr. Tom Ulrich  
Deputy Superintendent  
Sleeping Bear Dunes National Lakeshore  
9922 Front St. (Hwy N-72)  
Empire, Michigan 49630-9797

Re: Comments on Scoping for the Platte River Mouth Restoration and Access Plan  
Environmental Assessment

Dear Ms. Schultz:

Thank you for the opportunity to provide comments as part of the scoping process for the Platte River Mouth Restoration and Access Plan Environmental Assessment at Sleeping Bear Dunes National Lakeshore (SLBE). The purpose and objectives of this project are to 1) restore natural conditions and processes at the Platte River mouth to the greatest extent possible, 2) reduce impacts to the river due to dredging if dredging continues, 3) identify, minimize and mitigate effects to federally endangered and other sensitive species and to 4) continue to provide recreational access to Platte Bay.

The mouth of the Platte River and adjacent beach and dune areas are important habitats for many sensitive species of wildlife and plants, including several federally or state listed species. This location has been one of the most important and consistent breeding sites for the critically endangered Great Lakes Piping Plover, (*Charadrius melodus*) with nests occurring each season since 1995. In some years the plovers breeding at the Platte River Mouth and adjacent areas have comprised as much as 20% of the entire breeding population (11 out of 55 breeding pairs in 2011). The project area is also located with Unit MI-16 of the federally designated Critical Habitat for Great Lakes Piping Plover. Other federally listed species such as the threatened Pitcher's Thistle (*Cirsium pitcheri*) also occurs at this location. The federally threatened rufa Red Knot subspecies (*Calidris canutus rufa*) does not breed in the Great Lakes but could potentially use the beaches in the vicinity of the project area for migratory stopover locations in spring and fall. Each of these species, and their designated Critical Habitat, should be considered in the evaluation of project alternatives.

The scoping brochure included five possible alternatives for consideration in the EA. Alternative 1, considered the "No Action" alternative would continue current operations which allows for recreational boat access via the Platte River by continuing dredging activities and placement of spoils on the eastern river bank. Under current conditions, Platte Point itself has heavy recreational pressure as thousands of people visit the location each nesting season. Great Lakes Piping Plovers nest on either side of the river mouth with a pair of plovers sometimes nesting on the dredge spoil area itself. Although SLBE staff currently close sections of the beach, set up nesting exclosures and monitor Great Lakes Piping Plovers at this location, this does not entirely alleviate negative impacts on piping plovers from the heavy recreational use at Platte Point due

to violations of closed areas, and the fact that adult plovers and chicks can leave the closed areas soon after hatching. Sensitive plant species, such as Pitcher's Thistle can also be impacted by trampling in high use areas.

Continuing to dredge the Platte River and place dredge spoils on the eastern bank would continue to alter natural processes at Platte Point that may lead to further stabilization of the dune system here. This could lead to increased vegetation of the dunes and beach that could eventually leave much of the area unsuitable for Great Lakes Piping Plovers and sensitive dune plants.

Alternative 2 would end dredging at this location and remove the existing dredge spoil pile on the eastern riverbank while continuing to allow access for recreation boats via the Platte River. This alternative would allow for natural processes to be returned to the river mouth, which may result in improved habitat conditions for Great Lakes dune species. However, this alternative may eventually result in lack of recreational boating opportunities in the area if boats are no longer able to access Lake Michigan from the Platte River once dredging is discontinued.

Alternatives 3-5 all call for new recreational boat access in other nearby locations within Great Lakes Piping Plover critical habitat, including at Platte Point east of the river mouth, at Illinois Drive, or at Tiesma Road. All three alternatives would also involve removal of the current dredge spoil pile and restoration of the eastern bank of the Platte River. Each of these three alternatives, but especially alternatives 4 and 5, would involve new construction within Great Lakes Piping Plover critical habitat. Alternatives 4 and 5 would likely require construction of new parking facilities and possibly paved roads to allow for greater access at these locations. This could allow for increased recreation pressure onto the beaches east of Platte Point where Piping Plovers breed and where, under current conditions, piping plovers experience less recreation pressure than at Platte Point itself. Potential impacts to Piping Plovers, Piping Plover critical habitat, and Pitcher's thistle resulting from habitat alterations as well as increased recreation pressure, should be fully evaluated for each of these alternatives. Should an alternative be further developed that includes permanent structures along the shoreline within Piping Plover critical habitat, we recommend modeling how near shore processes may change as a result of the structure.

We recommend that SLBE consider an additional alternative that includes the development of access at the end of Esch Road. This location would be outside Great Lakes Piping Plover critical habitat and away from current plover nesting areas. This location also has fewer Pitcher's Thistle plants.

While all of the alternatives would likely involve continued consultation with the U.S. Fish and Wildlife Service, Alternatives 3, 4 and 5 are likely to require formal consultation under section 7 of the Endangered Species Act for potential impacts to Great Lakes Piping Plover and Great Lakes Piping Plover Critical Habitat as well as Pitcher's Thistle. Our office is available to assist you in initiating the consultation process.

We appreciate the opportunity to cooperate with you in conserving endangered species. If you have any questions regarding these comments, please contact Vince Cavalieri, of this office, at (517) 351-5467 or [vincent\\_cavalieri@fws.gov](mailto:vincent_cavalieri@fws.gov).

Sincerely,

  
*Acting for* Scott Hicks  
Field Supervisor

cc: Dan Kennedy, MDNR, Wildlife Division, Lansing, MI



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

NOV 16 2015

REPLY TO THE ATTENTION OF E-19J

Dusty Shultz, Superintendent  
Sleeping Bear Dunes National Lakeshore  
9922 Front Street  
Empire, Michigan 49630

**Re: Scoping Request – Platte River Mouth Restoration and Access Plan: Sleeping Bear Dunes National Lakeshore – Benzie County, Michigan**

Dear Mr. Shultz:

The U.S. Environmental Protection Agency received a scoping document regarding the National Park Service's (NPS) proposal to provide recreational boat access to Platte Bay on Lake Michigan and restore the natural fluvial processes of the reach of the Platte River from the existing boat ramp at Platte River Point to its confluence with Lake Michigan. Platte River Point is located approximately 12 miles southwest of the community of Empire, Michigan, in Benzie County. The study area is within the Platte River District, which is the southernmost portion of the NPS's Sleeping Bear Dunes National Lakeshore (SLBE). This letter provides EPA's comments on the scoping document, pursuant to our authorities under 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.

The scoping information indicates that dredging between the existing boat launch and the mouth of the River has occurred regularly since 1968. However, budget constraints in 2013 led NPS to stop dredging; dredging was completed by the State of Michigan that year. Due to economic constraints and high lake levels, dredging has not occurred since 2013. Because dredging has occurred since the 1960s, a large quantity of dredged material is located near the mouth of the river, on the eastern side. NPS is proposing to restore, to the fullest extent practical, the natural fluvial processes of the reach of the Platte River (from the boat ramp at Platte River Point to the river mouth and adjacent shoreline where stockpiled dredged materials are located) to a natural condition. The second purpose of the proposed project is to provide recreational boat access to Platte Bay in a manner protective of Park resources (e.g., protected species, wildlife, and habitat).



Five alternatives were presented in the scoping information:

- **Alternative 1** - the no action alternative: this proposes recreational boat access via the Platte River at its existing location while continuing or allowing dredging, and continuing to place dredged materials on the eastern river bank;
- **Alternative 2** – this proposes recreational boat access via the Platte River at its existing location without any maintenance dredging. This alternative also proposes removal of the existing spoil materials and restoration of the eastern river bank;
- **Alternative 3** – this proposes construction of a new recreational boat access location at Platte River Point east of the river mouth. This alternative also proposes removal of the existing dredged material and restoration of the eastern river bank;
- **Alternative 4** – this proposes construction of a new recreational boat access location at Illinois Drive. This alternative also proposes removal of the existing dredged material and restoration of the eastern river bank ; and
- **Alternative 5** – this proposes construction of a new recreational boat access location at Tiesma Road. This alternative also proposes removal of the existing dredged material and restoration of the eastern river bank.

Additionally, each alternative will require clearing and tree removal to different extents, new roadways (for access) and/or upgrades to existing vehicular roadways to provide the necessary widths and grades that allow for two-way traffic ingress and egress. Specifically, alternatives proposing new access locations would require that Illinois Drive and Tiesma Road be widened by approximately 6 feet. One parking lot is proposed to be constructed for each alternative and is expected to have a total of 30 parking stalls that can accommodate boat trailers. A single-vault restroom facility was also considered as part of the conceptual plan for each alternative.

EPA also reviewed the April 2014 Sleeping Bear Dunes National Lakeshore Conceptual Design Study – Final Report (Final Report). We offer the following comments, categorized by topic, to help NPS prepare the forthcoming NEPA documentation.

#### **Project Alternatives/Descriptions/Information**

- 1) The scoping documentation includes the project objective of restoring natural conditions and processes to the river mouth and adjacent beaches to the greatest extent possible by reducing impacts to the Platte River from dredging and improving dredged material management.  
**Recommendations:** EPA recommends the forthcoming Draft Environmental Assessment (Draft EA) include current baseline information concerning the Platte River and beaches to the east and to the south of the bay. Specifically, what indicators (e.g., aquatic wildlife, vegetative, terrestrial wildlife, etc.) will be selected to measure restoration of natural conditions/processes? What are the short-term/long-term goals for restoration of the selected indicators? The Draft EA should clearly discuss how each alternative will increase habitat quality and affect chosen indicators, in addition to the overall criteria used by NPS to evaluate alternatives and to select a preferred alternative.



- 2) The Final Report (page 5) indicates “*Pranger reviewed aerial photographs taken as early as 1938 to evaluate geomorphic changes in the reach of the Platte River from the boat ramp to the river mouth, and the lakeshore. The photographs clearly show how dredging of the river mouth and deposition of the sediment on the river banks have resulted in a narrower channel, which must either increase its velocity or become deeper in order to maintain flow continuity. Pranger noted that dredging practices in this reach have reduced the river from its natural width of 80 feet to an average of 30 to 50 feet and the depth has been increased from 1 foot or less to 2.5 feet.*”

**Recommendations:** The Draft EA should address whether restoration of the river bank will resemble 1938 conditions. If restoration alternatives will address only the eastern river bank, how was this restoration ‘endpoint’ developed? What criteria were used to determine restoration to the eastern river bank only was needed, rather than restoration to a 1938, pre-dredging condition?

- 3) The Final Report indicates that “*Given the quantity and quality characteristics of the dredge spoils, potential options for removing the existing dredge spoil stockpiles were evaluated and compared based on their pros and cons, and estimates of the associated costs. The options evaluated include:*

*A. In-water disposal*

*B. Platte Bay dune re-creation and upland disposal*

*C. Use as a construction material*

*D. Off-site hauling and upland disposal near existing Tiesma Road parking lot.”*

Potential locations for Options A, B, and D are represented in Figure 16 in the Final Report.

**Recommendations:** The Draft EA should discuss how Option C will be considered as a location to place materials that can be used as construction material, as this location is at eastern edge of the project area along the beach. Is this location a staging site for the material that would be removed at a later time to be used as construction material? If so, what are the impacts of using this area as a staging site? How long could materials be left in that location? EPA recommends that NPS identify an area in non-sensitive habitat to place construction materials.

EPA also recommends that the forthcoming Draft EA discuss whether other beneficial reuse of the clean dredged material is available.

- 4) Currently, recreational boat access to Lake Michigan within the region around the Platte River District is available at Platte River Point, Empire, and Glen Arbor.

**Recommendations:** The Draft EA should address what will happen to the existing boat access if a new recreational boat access point is developed, as suggested in Alternatives 3-5. For example, will boat access at Platte River Point be demolished and original conditions restored or will it still be used until no longer viable due to littoral drift and low drafts?

- 5) The Final Report indicates Alternatives 3-5 would include a removable boat ramp, which provides greater flexibility in seasonal placement of the ramp if changes occur due to shifts in the shoreline topography and/or lake water levels.

**Recommendations:** The Draft EA should explain the connections between greater flexibility with a removal boat ramp, shifts in shoreline topography, and impacts to wooded upland. We recommend NPS explain what is meant by “*shifts in shoreline topography*”

and/or lake water levels” and how those anticipated shifts might impact location of the boat ramp in conjunction with impacts to wooded upland due to the need for a new access road.

- 6) The Final Report indicates Alternatives 3-5 “will require new roadways or upgrades to existing roadways to provide the necessary widths and grades that allow for two-way traffic ingress and egress. Existing roadways (Illinois Drive and Tiesma Road) generally need to be widened by approximately 6 feet, and it was assumed that each linear foot of roadway widening would require 3 CY of grading. New roadway sections were proposed with a 20-foot top width and it was assumed that each linear foot of new road width would require 12 CY of grading.”

**Recommendations:** The Draft EA should study the effects of grading, including disposition of any material that would need to be taken off-site as a result of grading the roadway.

- 7) Alternative 3 proposes construction of a new parking lot near the beach, instead of near existing parking lots that are currently utilized.

**Recommendations:** The Draft EA should discuss why the proposed parking area is located in its currently proposed location. EPA recommends that the Draft EA also study an alternative location for a parking area for Alternative 3 closer to existing parking areas.

- 8) Several alternatives propose redistribution of sediments from the eastern dredged material site; these alternatives propose impacts to existing Piping Plover nests.

**Recommendations:** EPA does not support the relocation of existing sediments in a manner that impacts existing Piping Plover nests. The Draft EA should describe how project alternatives avoid impacts to existing nests.

- 9) The Final Report indicates that “one parking lot is proposed for each alternative and is expected to have a total of 30 parking stalls that can accommodate boat trailers. Each parking area is generally 60 feet wide by 150 feet long. Asphalt surfacing is proposed for the parking lot, which will require annual maintenance, consisting of cleaning or removal of windblown sand every 10 to 14 days during public use, and repair or replacement every 8 years. The annual maintenance cost is estimated at \$1,800 for asphalt maintenance and sand removal.”

**Recommendations:** EPA recommends that NPS commit to the use of permeable pavement or permeable pavers in areas proposed for parking areas or other permanent hardscaped areas<sup>1</sup>. The use of permeable pavement, with associated public education signage at the parking lot site(s), would add value to the National Lakeshore and have a secondary benefit of providing water infiltration rather than runoff into Lake Michigan.

- 10) Scoping documentation indicates “The Platte River District is located within the Platte River watershed, which is 179 mi<sup>2</sup> in size. ... Water resources are generally considered to be of good quality, with biotic communities more likely controlled by biologic processes within the stream than by environmental variability (NPS, 2009). However, the Platte River is still considered an area of concern as it is susceptible to impairment due to inputs from outside sources including septic systems, stormwater runoff, and increasing recreational uses.”

---

<sup>1</sup> [http://www.dnr.state.mn.us/water\\_access/bmp/pervious\\_pavement\\_bmp.html](http://www.dnr.state.mn.us/water_access/bmp/pervious_pavement_bmp.html)

**Recommendations:** The Draft EA should discuss whether NPS is working with relevant municipalities to address impacts from septic systems, stormwater runoff, and other potentially contaminated water runoff sources. Although water quality is not one of the stated objectives for the proposed project, water quality is essential to the Park's uses as a fishery and recreational destination in concert with the project purpose of restoring natural conditions to the river mouth and beaches to the greatest extent possible.

- 11) The Final Report indicates pros and cons associated with each alternative.

**Recommendations:** The Draft EA should explain how each alternative proposes avoidance and minimization of impact to the endangered Piping Plover from increased levels of disturbance from beach use from construction equipment, recreational boaters, people, and domestic pets. EPA recommends coordination with USFWS regarding avoidance and minimization be included in the NEPA documentation and committed to in any decision document.

### **Construction, Staging and Diesel Emissions Reduction**

- 1) Scoping documentation did not discuss any construction access or staging areas that may be required to implement any of the action alternatives.

**Recommendations:** Proposed construction measures, including a discussion of staging areas, access to the worksite(s), and any proposed in-water construction should be included the Draft EA. Additionally, EPA recommends the Draft EA include a draft spill management plan to discuss what measures might be employed to address accidental fuel spills.

- 2) Each alternative will require new roadways or upgrades to existing vehicular roadways to provide the necessary widths and grades that allow for two-way traffic ingress and egress. It is not clear if these areas have been studied for the presence of wetlands.

**Recommendations:** EPA recommends that a wetland delineation be undertaken for all locations where construction is proposed to be undertaken, including new roadways, areas of widening for existing roadways, proposed parking lots, proposed restroom areas, construction staging areas, and any areas in which sand disposal from the eastern dredge material pile may be reimbursed. The delineation should be undertaken during the growing season and be reviewed by Michigan Department of Environmental Quality (MDEQ) and the US Army Corps of Engineers (USACE).

- 3) While EPA recognizes that Benzie County is an attainment area for all criteria pollutants, we expect construction equipment used during the proposed project to emit diesel emissions. The National Institute for Occupational Safety and Health has determined that diesel exhaust is a potential occupational carcinogen, based on a combination of chemical, genotoxicity, and carcinogenicity data. In addition, acute exposures to diesel exhaust have been linked to health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues.

Although every project is unique, common actions can reduce worker and Park user exposure to diesel exhaust as well as reduce air impacts. EPA strongly recommends that the forthcoming NEPA documentation be revised to include the diesel emissions reductions stated below, as applicable, and commit to these reductions in the decision document.

Using low-sulfur diesel fuel (less than 0.05% sulfur).

- Retrofitting engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Positioning the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed.
- Using catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Using enclosed, climate-controlled cabs pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Regularly maintaining diesel engines, which is essential to keeping exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Reducing exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Purchasing new vehicles that are equipped with the most advanced emission control systems available.
- With older vehicles, using electric starting aids such as block heaters to warm the engine reduces diesel emissions.

### **Archaeological and Cultural Resources**

- 1) Scoping documentation did not discuss whether archaeological and cultural resources occur in the project area.

**Recommendations:** EPA recommends coordination with the Michigan State Historic Preservation Office to assess impacts to resources within the project area, if applicable. Please include copies of any coordination as an appendix to the Draft EA.

### **Vegetation and Wildlife Habitat**

- 1) The figures for Alternatives 3-5 show tree removal for access road construction.

**Recommendations:** EPA recommends that the Draft EA include information on current vegetation (e.g., native/non-native, species, etc.), the numbers or acres of trees that would be removed for each alternative, whether NPS is considering tree mitigation, and how trees will be disposed of. EPA strongly recommends that any vegetation not be burned, as burning vegetation increases air impacts, but instead mulch woody vegetation for use in the Park and/or by the community in yards, parks, commercial areas, etc.

EPA also recommends coordination with MDEQ and Michigan Department of Natural Resources regarding seasonal restrictions (e.g., removal of woody vegetation during winter months (October 1 through March 31), to the extent feasible, to avoid damage to migratory birds protected under the Migratory Bird Treaty Act; and in-water work restriction dates for

fish species). We recommend these timeframes become a commitment in the decision document.

Lastly, the forthcoming Draft EA should discuss how fragmentation of the wooded area shown in Figures 8, 10, and 12 of the Final Report might impact migratory bird usage of this wooded area.

### **Management/Monitoring**

- 1) Scoping documentation indicates that project features include restoring natural conditions and processes to the river mouth and to the beaches to the greatest extent possible.

**Recommendations:** As mentioned in the Project Alternatives/Descriptions/Information section of this letter, EPA recommends that the Draft EA discuss short- and long-term goals for restoration, as measured by select indicators. We also recommend that a monitoring and maintenance plan be developed and included in the NEPA analysis, including quantifiable and measureable success criteria for the restoration work (e.g., goal of 85 percent native aquatic and terrestrial species), and the duration of the monitoring period(s) and rationale for selecting the monitoring time period. A discussion of monitoring plan key features would be useful to the reviewer to understand what NPS envisions as measures of success.

Open-water restoration efforts undertaken by several U.S. Army Corps of Engineers districts in the Great Lakes basin have utilized the Lacustrine Qualitative Habitat Evaluation Index method to score potential restoration sites. EPA supports the use of qualitative metrics to score both baseline and restoration conditions. In the Draft EA, please provide narrative information on the type of proposed metric(s) to be utilized for management/monitoring. EPA recommends that baseline measurements be taken and utilized for comparison during monitoring.

EPA also suggests that the forthcoming draft NEPA documentation identify the aquatic and terrestrial noxious weeds/invasive species found near the project area<sup>2</sup>. Early recognition and control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have more adverse impacts on biodiversity and nearby water quality. We recommend that the NEPA documentation include aquatic and terrestrial invasive management plans that address identification and control of noxious weed/invasive species in and near the project area during construction and, perhaps, more importantly, a boater education program<sup>3</sup> to reduce the spread of aquatic invasives in the waterbody.

Because there are many unknowns regarding these types of project features (vegetation), we recommend a typical adaptive management plan (AMP) for this type of project be included with the Draft EA. The plan could include a description of actions to be initiated when NPS

---

<sup>2</sup> U.S. Department of Agriculture National Invasive Species Information Center link at:  
<http://www.invasivespeciesinfo.gov/resources/lists4states.shtml>

<sup>3</sup> Michigan aquatic nuisance species link at:  
[http://www.michigan.gov/dnr/0,4570,7-153-10365\\_10884-160949--,00.html](http://www.michigan.gov/dnr/0,4570,7-153-10365_10884-160949--,00.html)

determines that proposed revegetation actions are not progressing as desired. The AMP should include triggers that would invoke the AMP, along with specific actions and timelines for adaptive actions.

### **Climate Change Impacts**

- 1) Scoping documentation states, *“The 2009 Assessment of Natural Resources Report (NPS, 2009) identified three primary threats to SLBE: climate change, invasion of exotic species, and development pressure. Due in part to these factors, the report noted that the forecast for Lake Michigan is reduced ice cover, declining lake levels, reduced groundwater levels and stream base flows, and higher runoff during extreme precipitation events. Each of these threats contributes to the challenges of managing the diverse resources within SLBE.”*

In December 2014, CEQ issued revised draft guidance<sup>4</sup> with recommendations of how to consider the effects of greenhouse gas (GHG) emissions and climate change in NEPA documentation.

**Recommendations:** Based on this information, EPA recommends the following information be added to the forthcoming Draft EA:

- a) A summary discussion of climate change and reasonably-foreseeable climate change impacts relevant to the project, based on U.S. Global Change Research Program<sup>5</sup> assessments. This summary discussion would assist with identification of potential project impacts that may be exacerbated by climate change and inform consideration of measures to adapt to climate change impacts. This effort will assist in identifying resilience-related changes to the preferred alternative that should be evaluated and considered as part of the proposed project;
- b) An estimation of GHG emissions associated with all project alternatives. Example tools for estimating and quantifying GHG emissions can be found on CEQ’s NEPA.gov website. For actions that are likely to have less than 25,000 metric tons of CO<sub>2</sub>-e emissions/year, providing a qualitative estimate is acceptable, unless quantification is easily accomplished. The estimated GHG emissions can serve as a reasonable proxy for climate change impacts when comparing the proposal and alternatives. In disclosing the potential impacts of the proposal and reasonable alternatives, consideration should be given to whether and to what extent the impacts may be exacerbated by expected climate change in the project area, as discussed in the “affected environment” sections;
- c) Measures to reduce GHG emissions associated with the proposed project, including reasonable alternatives or other practicable mitigation opportunities. Disclose the estimated GHG reductions associated with such measures. Any commitments to implement reasonable mitigation measures that will reduce or eliminate project-related GHG emissions should be committed to in the decision document; and
- d) A discussion on adaptation and, as appropriate, practicable changes to the alternatives to make them more resilient to anticipated climate change.

---

<sup>4</sup> <http://go.usa.gov/3KEyR>

<sup>5</sup> <http://www.globalchange.gov/>

### **Permits**

- 1) The need for permits from MDEQ was mentioned in the Final Report, if one of the three alternatives that results in a new recreational boat access is selected. However, other necessary Federal, state or local permits were not mentioned.

**Recommendations:** Based on this information, EPA recommends a comprehensive list of permits that would be required for the selected alternative be included in the Draft EA. Specifically, the Draft EA should discuss the need for U.S. Army Corps of Engineers Clean Water Act Section 404 permits, U.S. Army Corps of Engineers Section 10 (Rivers and Harbors Act) permits, Coastal Zone Consistency Review/Permits, sediment and erosion control permits, septic permits, etc.

### **Federal and State Endangered/Threatened/Rare Species/Migratory Birds**

- 1) The Fish and Wildlife Coordination Act<sup>6</sup> (FWCA) requires that agencies consult with the U.S. Fish and Wildlife Service (USFWS) and state wildlife agencies concerning the conservation of wildlife resources where the water of any stream or other water body is proposed to be controlled or modified by a Federal agency or any public or private agency operating under a Federal permit.

**Recommendations:** Coordination concerning the FWCA should be described in an appendix to the Draft EA.

We commend the NPS for presenting two factors in the scoping information and Final Report: inclusion of maintenance costs to inform the public not only of estimated construction costs, but also typical maintenance costs and frequency; and secondly, for using a pros and cons format to present positive and negative factors associated with each alternative.

Kathy Kowal of my staff contacted Kevin Skerl, SLBE's Chief of Natural Resources, requesting an exhibit showing the relative locations of the preliminary Alternatives 3-5 in relation to existing facilities. The enclosed exhibit, provided by Mr. Skerl, indicates that all potential locations for construction of a new boat access location would be accessed via Lake Michigan Road. If selection of a new boat launch site is determined to be required, based on the scoping information and the Final Report, EPA would tentatively support Alternative 3 or 4. Support of Alternative 3 or 4 is predicated on the idea that Alternatives 3-5 would have similar impacts to Piping Plover. If however, Alternative 5 has greater impacts to upland habitat, but fewer impacts to Piping Plover, we would, of course, recommend the alternative with the least amount of impact to the Piping Plover. Overall, EPA would also support alternatives that do not propose any impacts to existing Piping Plover nesting sites or those alternatives that will not exacerbate the likelihood of future disturbance or harassment of existing nest sites by the public.

Thank you for the opportunity to comment on the proposed project at its earliest stages. We look forward to receiving future NEPA documentation concerning this project. If you have any

---

<sup>6</sup> 16 U.S.C. §§661-666c; PL 85-624

questions about this letter, please contact Kathy Kowal of my staff at 312-353-5206 or via email at [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov).

Sincerely,



*for* Kenneth A. Westlake, Chief  
NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

Enclosure: Platte Bay Access Preliminary Alternatives Location exhibit

cc: (via email)

Kevin L. Skerl, Chief of Natural Resources, Sleeping Bear Dunes National Lakeshore  
Charlie Simon, USACE-Detroit District  
Burr Fisher, USFWS, Ecological Services Field Office  
Brian Conway, MI SHPO