SLEEPING BEAR DUNES NATIONAL LAKESHORE
PLATTE RIVER MOUTH RESTORATION AND ACCESS PLAN
ENVIRONMENTAL ASSESSMENT

APPENDIX 2: ERRATA AND RESPONSES TO COMMENT

The Platte River Mouth Restoration and Access Plan Environmental Assessment (EA) was made available for public review and comment during a 45-day period from November 16, 2016 through January 15, 2017. During the Public Review period, a public meeting was held at the Philip A. Hart Visitor Center Auditorium (Empire, Michigan) on December 7, 2016. The meeting presented information about the project background, the planning process, and plan development. National Park Service (NPS) staff was on hand to answer questions and provide additional information to meeting participants.

During the review period, 41 pieces of correspondence were received from state and federal agencies, local government, conservation and recreation groups, and individuals. The correspondence was documented in the NPS Planning, Environment, and Public Comment (PEPC) website.

This appendix consists of two parts. Part 1 includes corrections and minor revisions to the EA. Page numbers referenced pertain directly to the EA document made available for public review. The edits and text corrections did not result in any substantive modifications to the selected alternative, and it has been determined that the revisions do not require additional environmental analysis. Part 2 includes responses to substantive public comments on the EA.

The Errata, when combined with the Platte River Mouth Restoration and Access Plan EA, comprises the only amendment deemed necessary for the purposes of completing the Final Platte River Mouth Restoration and Access Plan.

CORRECTIONS TO THE ENVIRONMENTAL ASSESSMENT

Some comments necessitated minor changes to the EA, which are noted below:

1. **Correction.** Change the EA, page 3, Background and Study Area, to read: Boat ramps are located at the end of county roads at Platte Point, Empire, and Glen Arbor. Boat access facilities are currently available at Leland (not shown) and ~~Frankfurt~~ *Frankfort.*

2. **Correction.** Change the EA, page 13, Impact Topics Dismissed from Detailed Analysis, Cultural Resources, to read: NPS staff from the Midwest Archeological Center (MWAC) evaluated locations within the study area in ~~2015~~ *2014* and 2016.

3. **Correction.** Change the EA, page 18, Alternative 2: Restoration of Platte Point (Preferred & Proposed Action), following the first paragraph bulleted activities have been added to include the following mitigation measures:

    - *Measures to reduce diesel and other construction related emissions, such as fugitive dust.*

- *Prohibiting contractors or other on-site personnel from staging construction or other equipment in wetlands or adjacent waterways, such as the Platte River itself.*

- *Identification of signs to keep visitors away from locations where debris removal is taking place or new vegetation is establishing. This may also include education-oriented signs that describe restoration goals, work schedule, and why it is important for visitors to stay out of certain areas.*

4. **Correction.** Change the EA, page 24, Comparison of Alternatives, Table 2.1 Water Resources, Alternative 2 Restoration of Platte Point, to read: *Beneficial impacts to wetlands would result from restoration of natural river migration. Deposition of sediments could provide a shallower environment for wetlands to form. No impacts to the floodplain are expected.*

5. Correction. Change the EA, page 32, Platte River to read: *The Platte River originates at Lake Ann in ~~Grand Traverse~~ Benzie County, and ~~runs through Leelanau and Benzie Counties and~~ empties into Lake Michigan.*

6. **Correction.** Change the EA, page 68, Appendix B, List of Threatened and Endangered Flora and Fauna Species to:

Name	Federal Status	State Status	Potential to Occur in Project Area?
Reptile Species			
Blanchard's Cricket Frog *Acris crepitans blanchardi*	Not Listed	Threatened	No
Spotted Turtle *Clemmys guttata*	Not Listed	Threatened	No
Eastern Massasauga *Sistrurus catenatus*	Threatened	Species of Concern	No
Blanding's Turtle *Emydoidea blandingii*	Not Listed	Species of Concern	~~No~~ *Yes, undocumented, anecdotal*
Wood Turtle *Glyptemys insculpta*	Not Listed	Species of Concern	~~No~~ *Yes, undocumented, anecdotal*
Eastern Box Turtle *Terrapene carolina carolina*	Not Listed	Species of Concern	No

Name	Federal Status	State Status	Potential to Occur in Project Area?
Bird Species			
Piping Plover *Charadrius melodus*	Endangered	Endangered	Yes
Henslow's Sparrow *Ammodramus henslowii*	Not Listed	Endangered	No
Short-eared Owl *Asio flammeus*	Not Listed	Endangered	~~No~~ *Yes*
Prairie Warbler *Dendroica discolor*	Not Listed	Endangered	~~No~~ *Yes*
Peregrine Falcon *Falco peregrinus*	Not Listed	Endangered	~~No~~ *Yes*
Loggerhead Shrike *Lanius ludovicianus migrans*	Not Listed	Endangered	No
Rufa Red Knot *Calidris canutus rufa*	Threatened	Not Listed	~~No~~ *Yes*
Red-shouldered Hawk *Buteo lineatus*	Not Listed	Threatened	No
Cerulean Warbler *Dendroica cerulea*	Not Listed	Threatened	No
Common Gallinule *Gallinula chloropus*	Not Listed	Threatened	No
Common Loon *Gavia immer*	Not Listed	Threatened	No
Caspian Tern *Sterna caspia*	Not Listed	Threatened	~~No~~ *Yes*
Common Tern *Sterna hirundo*	Not Listed	Threatened	~~No~~ *Yes*
Least Bittern *Ixobrychus exilis*	Not Listed	Threatened	No
Merlin *Falco columbarius*	Not Listed	Threatened	Yes
Northern Goshawk *Accipiter gentilis*	Not Listed	Species of Concern	No
Grasshopper Sparrow *Ammondramus savannarum*	Not Listed	Species of Concern	No
Marsh Wren *Cistothorus palustris*	Not Listed	Species of Concern	No
Bald Eagle *Haliaeetus leucocephalus*	Not Listed	Species of Concern	~~No~~ *Yes*

Name	Federal Status	State Status	Potential to Occur in Project Area?
Common Tern *Sterna hirundo*	Not Listed	Threatened	~~No~~ *Yes*
Least Bittern *Ixobrychus exilis*	Not Listed	Threatened	No
Merlin *Falco columbarius*	Not Listed	Threatened	Yes
Northern Goshawk *Accipiter gentilis*	Not Listed	Species of Concern	No
Grasshopper Sparrow *Ammondramus savannarum*	Not Listed	Species of Concern	No
Marsh Wren *Cistothorus palustris*	Not Listed	Species of Concern	No
Bald Eagle *Haliaeetus leucocephalus*	Not Listed	Species of Concern	~~No~~ *Yes*
Osprey *Pandion haliaetus*	Not Listed	Species of Concern	~~No~~ *Yes*

7. **Addition.** Page 38, Water Resources, Platte River: The EA did not contain a conclusion regarding the impacts of the Selected Alternative on the Platte River National Rivers Inventory (NRI) segment. However, the impact analyses contained in the EA support a conclusion that no direct and adverse impacts on the NRI segment or its Outstanding Remarkable Values are expected from the proposed action that would affect its eligibility for listing under the Wild and Scenic Rivers Act.

8. **Addition.** Page 42, Threatened and Endangered Species, Impacts to Threatened and Endangered Species from Alternative 2, Conclusions: The EA identified rufa red knot (*Calidris canutus rufa*) as potentially present in the study area, but does not specifically address impacts to this species as it had not been recorded in the National Lakeshore. However, the proposed action may affect but is not likely to adversely affect rufa red knot, if present, due to the minimal scope and timing of the proposed action and overall beneficial effects on beach habitats.

RESPONSES TO COMMENTS

The following are the NPS responses to substantive comments received during the public review of the Platte River Mouth Restoration and Access Plan Environmental Assessment. The NPS's Director's Order 12 (DO 12, section 4.6A) defines a substantive comment as one that does the following:

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

Based on the comments received, there were no substantial modifications required for Alternative 2: Restoration of Platte Point (NPS preferred and proposed action), which has been selected for implementation. The comment responses below are arranged by substantive code.

Affected Environment:

The affected environment represents existing conditions. Comments were provided relating to threatened and endangered species; wildlife and wildlife habitat; and fish and fisheries.

Threatened and Endangered Species

Commenters noted the successful nesting of piping plovers in the relatively pristine area of the Tiesma Road beach access, and additional threatened and endangered species listed in the EA that occur in the project study area.

> **NPS Response:** As noted on page 27 of the EA, the entire project area (except for portions of Tiesma Road) is within designated Critical Habitat for piping plover. The NPS' piping plover monitoring program records indicate an average of 2.6 nests per year in the Platte Bay/Tiesma Road area over a 10-year period (2005-2014) compared to an average of 7.7 nests at Platte Point within the same period.
>
> As noted in "Corrections to the Environmental Assessment," text in the EA Appendix B-List of Threatened and Endangered Flora and Fauna Species has been amended to include the following state-listed species of concern, as occurring in the Platte Point area:
>
> - Short-eared Owl - Observed in wetlands west of river during spring migration
> - Prairie Warbler - Occur and breed regularly in the dunes near Tiesma Road and in the dunes just south of the Platte River.
> - Peregrine Falcon - Seen regularly in migration (both spring and late summer) at Platte Point and along Platte Bay.
> - Rufa Red Knot - At least three records of occurrence at Platte Point during migration.
> - Caspian Tern - Regular summer resident at Platte Point, often occurring in large flocks. No breeding known in Sleeping Bear Dunes National Lakeshore (SLBE).
> - Common Tern - Yearly records at Platte Point during spring, summer, and fall.
> - Merlin - Known to breed and hunt in the area of Platte Point and Tiesma Road. Yearly summer resident.

- Bald Eagle - Almost daily sightings at Platte Point and along Platte Bay. Bald Eagles are known to nest between Esch and Peterson Road along Otter Creek.
- Osprey - Yearly migration observations at Platte Point and along Platte Bay.

Wildlife and Wildlife Habitat

Commenters noted additional wildlife species listed in the EA that occur within the project study area and the need to consider a large user group--birders--in the Platte River area.

NPS Response: As noted in "Corrections to the Environmental Assessment," text in the EA, page 26, Existing Conditions/Affected Environment, Wildlife and Wildlife Habitat, third paragraph has been changed to clarify the number of wildlife species documented in the National Lakeshore including 268 species of birds, of which 170 have been documented at Platte Point (NPS 2008; Cornell Lab of Ornithology, eBird 2016).

As noted in "Corrections to the Environmental Assessment," text in the EA Appendix B-List of Threatened and Endangered Flora and Fauna Species, has been amended to include the following state-listed species of concern, as occurring in the Platte Point area:

- Blanding's Turtle (undocumented, anecdotal)
- Wood Turtle (undocumented, anecdotal)

Management of resources within the National Lakeshore provides opportunities for all types of users to enjoy a variety of experiences. The High Use management designation of the Platte Point area does not preclude use of the area by bird watchers. As noted on page 37, universal accessibility within the National Lakeshore is important to provide opportunities for visitors of all abilities to experience the dunes, surrounding sands and water, historic structures and cultural landscapes, and enjoy representative portions of the back country.

Fish and Fisheries

Commenters noted efforts by the Michigan Department of Natural Resources (MDNR) to increase opportunities for anglers and the importance of contributions by this user group on ecological functions within the Lake.

NPS Response: As noted on page 12 of the EA, this impact topic was dismissed from detailed analysis because implementation of the proposed alternatives would not impact the performance of the State of Michigan Department of Natural Resources (MI DNR) upstream hatchery or management of the fishery.

As the Purpose and Need for this EA states on page 8, the NPS must consider how to provide recreational boat access in a manner that is sensitive to natural resources and the needs of the visiting public. Anglers make up a small proportion of the total visitor use, but are provided ample opportunities for fishing. The comment noted 2,558 angler trips from April-October based on the 2012 Creel Survey. Total visitation to this area during the same time period was approximately 284,000. Page 6 of the EA notes public use records for the Platte River from 2011 through 2013 indicated a range of 82,000 to 93,000 visitors monthly in July and August. Page 37 of the EA notes visitor use data for the National Lakeshore (NPS 2016b) shows a relatively steady increase in visitors annually from the 696,600 recorded in 1976 to over 1.5 million in 2015. The Platte River

District is considered one of the highest use areas with traffic counts showing a high of 31,307 vehicles at the Platte River mouth in the month of July (NPS 2015a).

Regarding the ecological health of Lake Michigan, the mission of the NPS does include preserving and enhancing ecological health and processes within the National Lakeshore. However, maximizing angler opportunities in an effort to increase state licensing fees is not an efficient, or appropriate, way for the NPS to attempt to achieve this.

Alternatives:

This section of comments relates to the no action and action alternatives presented within the EA. Alternatives that received comments were related to other parking locations; granting the land back to the State; other dredging practices; spoils management and uses; and mitigation and management plans.

Other Parking Locations

Several commenters noted the need for additional parking to accommodate the increasing number of users at Platte Point.

NPS Response: The Purpose and Need for Action on page 8 of this EA, states that the purpose of this Platte River Mouth Restoration and Access Plan project is to restore fluvial geomorphic processes and the aquatic ecosystem functions to the mouth of the Platte River while maintaining recreational boat access to Platte Bay, in Lake Michigan, in a manner that is sensitive to the National Lakeshore's natural resources (such as habitat, wildlife, and protected species) and the needs of the visiting public. Alternative 3, Restoration and new Boat Access at Tiesma Road, discusses parking on page 19 and later states that a parking area at Tiesma Road may be easier at Platte Point through the dispersal of visitors, and could potentially reduce the number of vehicles parked along roadsides during peak use periods in section 4.6 on page 49. The discussion of parking in Alternative 3 is incidental to the construction of a new launch location rather than as a purpose of the project. Further parking needs at Platte Point is beyond the scope of this project.

Grant Land Back to State

Commenters expressed a desire for the NPS to return the park back to the State of Michigan, if they are unwilling to manage the park for public access.

NPS Response: Returning National Park Service lands back to state and private ownership is beyond the scope of this EA. As noted on page 1, in the "Description of the Park" text in the EA, "The U.S. Congress established the National Lakeshore on October 21, 1970 (Public Law 91-479) to preserve "outstanding natural features, including forests, beaches, dune formations, and ancient glacial phenomena" for the "benefit, inspiration, education, recreation, and enjoyment of the public." The returning of these lands was not part of the analysis of this EA and would require an act of Congress.

Other Dredging Practices

Several commenters noted that the MI DNR has expressed a willingness to take over dredging and conduct it in a manner that does not adversely impact the adjoining shoreline habitats.

NPS Response: As stated in the Purpose and Need on page 8 of this EA, dredging actions have resulted in the unnatural control and channelization of the river. Page 3 describes a study on dredging at the Platte River Mouth conducted by the NPS' Geological Resources Division (NPS 2005a), which concluded that human disturbances and dredging operations have directly altered this reach of the Platte River, meaning the segment of river from the boat ramp at Platte Point to the river mouth. While deposition of dredge spoils is an impact to adjacent shoreline environments, it is the dredging practices themselves that have reduced the river from its more natural width of 80 ft to an average of 30 to 50 ft; and its depth increased to at least 2.5 ft to meet dredge permit criteria for boat access. Dredging impacts to the fluvial geomorphic processes are discussed on page 45 and state that continued dredging would impact approximately 900 linear ft of the Platte River.

As noted on page 23 of the EA, alternative spoils management would only allow for limited restoration by itself and does not meet the NPS' objective of restoring natural river processes to the mouth of the Platte River. Alternative spoils management is provided in Alternative 1, the no action alternative. However, further environmental review is recommended as part of the required permitting process and was not part of the impact analysis in this EA.

Spoils Management and Uses

Several commenters expressed support for managing the dredge spoils in a more efficient and environmentally sensitive manner, with the desire to maintain dredging of the Platte River and provide piping plover nesting habitat.

NPS Response: As noted on page 23 of the EA, alternative spoils management would only allow for limited restoration by itself and does not meet the NPS' objective of restoring natural river processes to the mouth of the Platte River. Alternative spoils management is provided in Alternative 1, the No Action alternative. However, further environmental review is recommended as part of the required permitting process and was not part of the impact analysis in this EA.

Alternative 2 does look at alternative spoils disposition for the river bank restoration and notes the need for further environmental analysis to be completed for the selected disposal option. As noted on page 18 of the EA, restoration of the riverbank includes reshaping the contours of the eastern bank (e.g., typical foredune with a large flat cobble pan) to be more conducive to piping plover nesting.

Mitigation and Monitoring Plans

A commenter recommended providing additional mitigation measures within the final EA and the Finding of No Significant Impacts (FONSI).

NPS Response: As noted in "Corrections to the Environmental Assessment," text in the EA, Alternative 2: Restoration of Platte Point (Preferred & Proposed Action), page 18, following first paragraph bulleted activities have been added to include the following mitigation measures:

- Measures to reduce diesel and other construction related emissions, such as fugitive dust, as outlined in our scoping letter, page 6.

- Prohibiting contractors or other on-site personnel from staging construction or other equipment in wetlands or adjacent waterways, such as the Platte River itself.
- Identification of signs to keep visitors away from locations where debris removal is taking place or new vegetation is establishing. This may also include education-oriented signs that describe restoration goals, work schedule, and why it is important for visitors to stay out of certain areas.

Purpose and Need:

This topic addresses the purpose and need for actions taken by the NPS. Comments were directed to the NPS' authority to take action.

Park Legislation and Authority

Several commenters expressed the need for the NPS to meet its obligations to the State of Michigan to maintain safe access for recreational boaters using the Platte River.

> **NPS Response:** The NPS has dredged this area to improve boater access since the State ceased doing so in 1979. The NPS is under no obligation to continue to do so under any agreement, memorandum, or deed. The NPS has periodically reviewed whether this activity should continue, and this EA is intended to be a decision document toward that end.

Socioeconomics:

The topic addresses potential effects of the alternatives on socioeconomics for the NPS and the local economy.

Costs to NPS

Commenters expressed concern that if the NPS cannot afford to dredge the river, it is unlikely that they can afford alternative spoils management or the addition of new facilities.

> **NPS Response:** There are different funding sources for the recurring operational practice of dredging, and the one-time cost of restoration. Under the No Action Alternative, page 15 of this EA, annual fall dredging would continue to depend upon funding availability and need at a cost of approximately $10,000 a year. Uncertainty associated with the recurring need to dredge and the timing of the decision for need make funding difficult to obtain from fund sources other than the base operating funds for the Lakeshore.
>
> Alternative 3 would have a one-time cost associated with construction related activities. However, as noted in the first paragraph of page 22, the park operating budget would be impacted due to the need to perform the seasonal tasks to place boat ramp, annual maintenance and repair of the boat ramp, restroom facilities and roadway. Resource protection and maintenance would also be needed. Estimates of operation and maintenance costs for the new facilities are comparable to the expenditures currently used for annual dredging at Platte Point. While dredging is subject to funding availability under the No Action Alternative, operation and maintenance required under Alternative 3 would be required regardless of funding availability and likely impair other park

operations to offset costs. Costs would vary by year based on maintenance needs but there will always be costs associated with ramp maintenance and road and facility maintenance.

The NPS Preferred and Proposed Action estimates the removal and disposal of dredge spoils ranging in cost between $172,000 (off-site disposal) to $214,000 (in-water disposal) on page 17. The funding needed to accomplish this action would be required one time and can be obtained through alternative fund sources as a planned project with known costs and timing. No expenditures for new facilities or recurring dredging and maintenance would be needed for this alternative.

Local Economy

Commenters expressed concern regarding potential impacts to the local economy if fishermen are unable to access Platte Bay in the absence of dredging.

NPS Response: The socioeconomic impact topic was removed from detailed analysis as noted on page 12 of the EA, as the net tourism benefits of the National Lakeshore are not expected to change measurably under any alternative. While a few individual businesses would likely be affected, the effects on the overall local economy would be minimal and recreational fishing opportunities would remain accessible at Platte Point and other nearby locations.

The 2012 Platte Bay Creel Survey reported 2,558 angler trips from April through October. This does not reflect the number of individuals that could then be translated into license dollars as some anglers may have repeatedly visited the area. Also, when compared to the overall use of the park, fishermen represent a very small proportion of the visitors at Platte Point as there were approximately 284,000 visitors to this area from April to October of 2012. As noted on page 6 of the EA, public use records for the Platte River from 2011 through 2013 indicate a range of 82,000 to 93,000 visitors monthly in July and August. As noted on page 37 of the EA, the Platte River District is considered to be one of the highest-use areas within the National Lakeshore with traffic counts at a high of 31,307 vehicles at the Platte River mouth in the month of July (NPS 2015a).

Threatened and Endangered Species:

This topic addresses potential impacts by the alternatives to threatened and endangered species. Comments were received related to threatened and endangered bird species.

Birds

Commenters noted potential impacts to piping plovers resulting from river bank restoration and potential development of facilities at Tiesma Road.

NPS Response: As noted on page 16 of the EA, rehabilitation of the eastern river bank by actively removing the dredge spoil pile and reshaping the bank to conditions that existed prior to stockpiling is the primary objective and will be more conducive to piping plovers. Rehabilitation and restoration of the western river bank may be addressed, if deemed feasible and beneficial during final restoration planning.

A reference to the 2011 Baird/URS report on page 16 of the EA noted that during the early years of dredging, approximately 2,600 cubic yards (CY) of dredge material was placed along a 1,200-foot stretch of the western river bank to stabilize the bank and to keep the river mouth from wandering. Therefore, due to this limited quantity of spoils deposition, vegetative management is likely the most practical and feasible method to restore the western river bank.

Additionally, as noted on page 42 of the EA, piping plovers have successfully nested on or near the spoil piles in previous years but nesting attempts have generally been unsuccessful, likely due to high visitor use in the area. Based on nesting densities from previous years in adjacent locations on the western bank of the Platte River, the restored spoil piles could potentially provide additional habitat for up to four additional nesting pairs, but their nesting success, especially on the eastern side, may remain limited due to continued high levels of recreational use.

Consultation with the U.S. Fish and Wildlife Service (USFWS) provided concurrence that Alternative 2, the preferred and proposed action, is not likely to adversely affect Great Lakes piping plover or Great Lakes piping plover critical habitat, and that any effects of the project would be insignificant and/or wholly beneficial.

Regarding potential impacts to piping plovers at the Tiesma location, Alternative 3, the EA notes on page 43 that constructing amenities at this location would be expected to draw in more visitors to this area. This could lead to more recreation pressure on the beach location within the critical habitat, which currently receives less recreation pressure. This increased activity may result in reducing the success of nesting piping plovers in this area. Based on data from previous years of nesting, this could result in the loss of one to two nests annually.

Visitor Experience:

This topic relates to the experiences visitors may have within the National Lakeshore. Comments were received regarding the scenic value of the study area and potential effects of the alternatives.

Scenic Values

Commenters expressed concern about the impacts of developing recreational boat access at Tiesma Road in what they consider to be a natural area.

NPS Response: As noted on page 8 of the EA, Platte Point and Tiesma are within the NPS' designated High Use management zone, which provides for high levels of recreational use and potential development to accommodate visitor use. One of the purposes of the EA is to evaluate the appropriateness of facilities (such as boat ramps) for providing recreational boat access to Platte Bay.

As noted on page 48 of the EA, there would be short-term adverse impacts to the visual quality of the Tiesma Road area during construction due to the presence of construction equipment. In the long-term, there would be adverse impacts due to placement of a visible structure (restroom facility). The increase in public use of the area would also likely have an adverse impact on the scenic character of this area.

Visitor Conflicts and Safety:

This topic addresses the potential effects of the alternatives on visitor conflicts and safety. Comments were received related to impacts of the proposed alternatives on visitors; and boater safety.

Impact of Proposal and Alternatives

Several commenters noted issues with overcrowding at Platte Point and the need for the NPS to address this issue through changes in management.

> **NPS Response:** Assessing changes in management to address overcrowding of Platte Point is beyond the scope of the EA. However, as noted on page 49 of the EA, the addition of facilities at the Tiesma Road location may provide long-term benefits to Platte Point by dispersing visitors throughout this high-use area. This may also benefit the safety of swimmers by reducing the number of motor boats at Platte Point. New facilities may attract more public use to an area that is currently underused and under advertised, adversely affecting individuals who prefer solitude, but benefitting those who would enjoy a new location they may not have otherwise visited. Increased public use of this area could result in the need for additional facilities.
>
> Vehicular access and parking would benefit over the long-term through the widening of Tiesma Road and the additional parking lot. Parking at Platte Point may be easier through the dispersal of visitors, and could potentially reduce the number of vehicles parked along roadsides during peak use periods. The increased use of this new facility for parking would adversely impact the visual character of the area which currently has no structures and limited parking.

Boater Safety

Commenters expressed the importance of safe boat access to Platte Bay, especially in light of the Coast Guard Station at Frankfort becoming seasonally operated. Concern was also expressed regarding boater safety through direct bay access at Tiesma Road if proper refuge is not provided.

> **NPS Response:** A plan to make the Frankfort Coast Guard Station seasonal has not yet been approved. Public information has not yet been made available regarding exact staffing dates though a December 30, 2016 press release published by the Record-eagle.com notes that staff will be relocated to the larger Manistee Station for the fall and winter months. The article states that the Manistee Coast Guardsmen already have responsibility in the Frankfort coverage area any time waves exceed 6 feet or winds blow harder than 25 knots because of the Frankfort Station's lack of necessary equipment. Equipment also limits crews to responding only to incidents within 10 nautical miles offshore. The Coast Guard points to new and modernized equipment, like communication networks that provide pinpoint locations of boats or people in distress, to add to their argument that they can adequately assist emergency responders from Manistee and provide adequate service from Manistee for the Leland to Arcadia area.
>
> As noted on page 49 of the EA, use of the ramp at the Tiesma location would require boaters to be alert to lake and weather conditions. The Tiesma Road boat ramp would be similar to other ramps that directly access Lake Michigan without wave protection structures. Such ramps can be challenging to use under certain conditions.

Boating on Lake Michigan has inherent risks, and all boaters must take proper precautions, including gauging their ability to successfully negotiate launch sites and shallow near-shore waters.

Wildlife and Wildlife Habitat:

This topic addresses the potential effects of the proposed alternatives on wildlife and wildlife habitat. Comments were received related to fish and fisheries.

Fish and Fisheries

Commenters noted the importance of the Lake's fishery and expressed concern about the lack of information on the potential impact on this resource if dredging is ceased.

NPS Response: The mission of the NPS is to preserve and enhance the ecological health and processes within the National Lakeshore. As noted on page 12 of the EA, this topic was dismissed from detailed analysis as implementation of the proposed alternatives would not impact the performance of the State of Michigan Department of Natural Resources (MI DNR) upstream hatchery or management of the fishery.

As noted on page 48 of the EA, access to fishing in Platte Bay would still be provided but could potentially be more difficult dependent upon lake and river conditions. However, the public has access to salmon fishing throughout the lake and its tributaries. Overcrowding issues may actually have a greater affect upon use of the Platte Point area by recreational boaters than conditions at the river mouth.

Water Resources:

This topic addresses the potential effects of the proposed alternatives on water resources. Comments were received related to rivers and river processes.

Rivers and River Processes

A commenter noted that the Platte River could return to a natural state with dredging and management of the dredge spoils.

NPS Response: As stated in the Purpose and Need on page 8 of this EA, dredging actions have resulted in the unnatural control and channelization of the river. Page 3 describes a study on dredging at the Platte River Mouth conducted by the NPS' Geological Resources Division (NPS 2005a) which concluded that human disturbances and dredging operations have directly altered this reach of the Platte River, meaning the segment of river from the boat ramp at Platte Point to the river mouth. While deposition of dredge spoils is an impact to adjacent shoreline environments, dredging practices in this reach have reduced the river from its natural width of 80 ft to an average of 30 to 50 ft; and the depth has been increased from 1 ft or less to 2.5 ft to meet dredge permit criteria for boat access. Dredging impacts to the fluvial geomorphic processes are discussed on page 45 and state that dredging would impact approximately 900 linear ft of the Platte River, which would result in the temporary mobilization of fine sediments in the river and in Lake Michigan. This may temporarily impact water quality at the mouth of the Platte River and

into Lake Michigan. Dredging would also channelize the mouth of the Platte River and prevent dune habitat from forming.

As noted on page 23 of the EA, alternative spoils management would only allow for limited restoration by itself and does not meet the NPS' objective of restoring natural river processes to the mouth of the Platte River. Alternative spoils management is provided in Alternative 1, the no action alternative. However, further environmental review is recommended as part of the required permitting process and was not part of the impact analysis in this EA.