

**FINDING OF NO SIGNIFICANT IMPACT**  
**PLATTE RIVER MOUTH RESTORATION AND ACCESS PLAN**  
**ENVIRONMENTAL ASSESSMENT**  
**SLEEPING BEAR DUNES NATIONAL LAKESHORE**

**INTRODUCTION**

The National Park Service (NPS) has prepared a Platte River Mouth Restoration and Access Plan Environmental Assessment for Sleeping Bear Dunes National Lakeshore (the National Lakeshore), in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended. The Environmental Assessment (EA) documents the results of the Platte River Mouth Restoration and Access Plan and the potential environmental impacts associated with the Proposed Action.

The Council on Environmental Quality (CEQ) regulations specifically direct that "Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts" (40 Code of Federal Regulations [CFR] 1501.2). Additionally, both CEQ regulations and NPS policies direct that environmental assessments be prepared when compliance with the NEPA can be achieved through environmental analysis and preparation of an Environmental Impact Statement (EIS) is not necessary.

An EA serves three primary purposes: 1) to help determine whether the impact of a proposed action or alternative could be significant; 2) to aid in NEPA compliance when no EIS is required, by evaluating a proposal that will have no significant impact but that may have measurable adverse impacts; and 3) to facilitate preparation of an EIS, if one is determined to be necessary.

**PURPOSE AND NEED**

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.

Restoration of fluvial geomorphic processes and ecosystem function is needed because the Platte River has been dredged annually to maintain boat access to Platte Bay, and the dredge spoils placed on the riverbank at the mouth of the river, mostly on the eastern side. These actions have resulted in the unnatural control and channelization of the river, and the creation of an artificial sand and gravel mount that interferes with the aesthetics, public use, and use of the site by rare plant and animal species.

Recreational boat access to Platte Bay is highly desirable as paddlers, boaters, and fishermen come to Platte Point because it is the only access facility between Empire and Frankfort, and is the closest location to the Platte River salmon hatchery and the historic salmon migration area.

A sustainable access plan is needed that is economically feasible and conforms to applicable laws and the NPS mission and policies. The following objectives were identified during the initial project planning phases and must be achieved for the project to be considered a success:

- Restore natural conditions and processes to the river mouth and beaches to the greatest extent practical.
- Reduce impacts to the Platte River due to dredging, and improve dredge spoil pile management should dredging continue.
- Identify, minimize, and mitigate effects on federally endangered and other sensitive species.
- Provide recreational boat access to Platte Bay.

## **ALTERNATIVES**

Three alternatives, including two action and one no action, were considered and carried forward for evaluation. The two action alternatives would meet the project purpose and need for river restoration; improved dredge spoil pile management; minimizing or mitigating impacts on federally endangered flora and fauna; and recreational boat access to Lake Michigan. The No Action Alternative would not meet the project purpose and need. The three alternatives evaluated in the EA are summarized below.

### **Alternative 2: The Proposed Action (Selected Action)**

Alternative 2 is the NPS' selected alternative that will best address the purpose and need for the proposed action. Under this alternative, recreational boat access to Platte Bay would remain available via the existing boat ramp and Lake Michigan Road owned and maintained by Benzie County. However, the NPS would no longer conduct the annual fall dredging of the river, and the existing dredge spoil piles along the river bank would be removed and the river banks restored to pre-dredging conditions.

This alternative retains recreational boat access consistent with the General Management Plan (GMP) zoning. Boats would still be able to access Lake Michigan at the Benzie County ramp, although the ease of such access would be more dependent upon current lake levels, the location of the river mouth and the boating equipment involved. Increased consideration of the difficulty and risk associated with the use of a natural river mouth access point would be required of boaters, as is the case for other unprotected boat access points. No expenditures for dredging or new facilities would be needed for this alternative.

The river mouth would be allowed to return to a more natural (i.e., pre-dredged) state over time. Rehabilitation of the river banks, through removal of the dredge spoil piles, will facilitate a return to naturally meandering river mouth. 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. Rehabilitation and restoration of the western river bank may be addressed, if deemed feasible and beneficial during final restoration planning.

Disposal options for the dredge materials removed from the river banks include in-water disposal, upland disposal, hauling off-site, or use as construction material. Appropriate sites within the National Lakeshore for off-site disposal may include old gravel pits, demolition sites, etc, to avoid additional resource impacts. Further environmental analysis will be completed for the selected disposal option.

Rehabilitation, restoration, and mitigation activities would generally be conducted in the fall (September to November) after the piping plovers have migrated and salmon fishing and beach use has diminished and would include:

- Rehabilitation of the river banks including removal of existing spoil piles and vegetation and reshaping the contours that would be conducive to piping plover nesting (e.g., typical foredune with a large flat cobble pan behind it) on the eastern bank.
- Restoration of the beach and dune ecosystem landscape including replanting of vegetation during the appropriate growing season.
- Development of a plan to conduct river monitoring to track the success of passive or natural restoration in the river.
- Development of a plan to conduct vegetation monitoring to track the success of active restoration.

### **Alternative 1: No Action**

Under the “No Action” alternative, no changes would be made to the current NPS management practices. Recreational boat access to Platte Bay would be available via the existing boat ramp at Platte Point that is owned and maintained by Benzie County. Annual fall dredging of the Platte River would continue dependent upon funding availability and need. The cost of dredging for an estimated 900 cubic yards of spoil material is approximately \$10,000 per year. Dredging of the river annually would also continue to add to the dredge spoil pile on the eastern riverbank. Disposal of the dredge material was estimated to range from \$14,400 to \$18,000 annually, dependent upon disposal method. However, alternative spoils management (e.g., in-water disposal or off-site disposal) may be considered and impacts evaluated as part of any permitting efforts.

### **Alternative 3: Restoration and New Boat Access at Tiesma Road**

Under this alternative, the NPS would cease dredging the Platte River and conduct restoration actions as described in the Alternative 2, the Selected Action. The Benzie County boat ramp at Platte Point would remain open for recreational boat use as determined by the County. Additionally, the NPS would provide new recreational boat access to Platte Bay at Tiesma Road, east of Platte Point. The existing Tiesma Road is a 10-foot wide gravel road that leads to a small gravel parking lot and foot path to the Platte Bay beach. The public can also access the beach path by a trail from the Platte River campground located approximately 300 feet due east of the Tiesma Road beach access trail.

Facilities and improvements for the new recreational boat access would include:

- Improvements to Tiesma Road
- Asphalt access road to the boat ramp
- Asphalt parking lot
- Removable geoweb boat ramp
- Single vault restroom
- Vegetation clearing and tree removal

Under Alternative 3, the NPS would also implement restoration and mitigation measures described for the Proposed Action, as well as the following:

- Removal of woody vegetation during winter months (October through March) to avoid immediate impacts to migratory birds.
- Revegetation of areas impacted by construction activities with appropriate native species.
- Application of erosion and sediment control best management practices (BMPs) for construction activities.
- Development of an adaptive management plan to address long-term monitoring and management of resources.

## SIGNIFICANCE CRITERIA REVIEW

The CEQ regulations define ‘significantly’ as requiring consideration of both context and intensity (40 CFR 1508.27). Context is the analysis of the significance of an action in relation (context) to society, locality, and affected region and interests. Both short- and long-term effects are relevant. Intensity refers to the severity of the impact and is evaluated using ten criteria listed in 40 CFR 1508.27:

***(1) Impacts may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance, the effect will be beneficial.***

The NPS’ selected alternative has the potential for both beneficial and adverse effects on: wildlife and wildlife habitat, threatened and endangered species, vegetation, water resources, and visitor experience and safety.

The following table summarizes the impacts under the proposed action.

Impact Topic	Alternative 2 Restoration of Platte Point
Wildlife and Wildlife Habitat	Beneficial impacts to wildlife species through the addition of natural habitat, including beach habitat for foraging, due to the removal of dredged materials and the restoration of the area to a more natural state.
Threatened and Endangered Species (T&E)	Beneficial impacts to piping plover critical habitat and other T&E species not currently present through restoration of the river banks to more natural conditions.
Vegetation	Impacts to vegetation would be beneficial due to removal of less desirable non-dune vegetation and restoration of dune conditions that are more conducive to sensitive dune species, including late successional dune species.
Water Resources	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.

<b>Visitor Experience and Safety</b>	<p>Visual character would benefit by the restoration of the river banks. Visitor use of the riverbanks could be more restricted within certain locations during the spring nesting season if restoration results in the need for more temporary enclosures to protect piping plover nest sites.</p> <p>Boater safety could be adversely impacted if the channel becomes shallow due to natural meandering and boaters are required to lift motors to enter or exit the river.</p> <p>Access to fishing in bay from the Platte River could be adversely impacted dependent upon changes in lake and river conditions. However, the public has access to salmon fishing throughout the lake and its tributaries.</p>
--------------------------------------	--

The level of adverse and beneficial effects will not be significant.

***(2) The degree to which the proposed action affects public health or safety.***

Entering and exiting the Platte River mouth would likely be more challenging for boaters dependent upon lake and river conditions, making entry and exit to the bay less safe for some boaters. 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.

Cessation of dredging under the Proposed Action could have a beneficial impact on public safety by reducing the potential for conflicts between boaters and swimmers, an issue currently occurring at the river mouth. If fewer boats used this area for lake access, this would also result in a reducing these potential conflicts.

The effects as described above on public health and safety would not be significant.

***(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetland, wild and scenic rivers, or ecologically critical areas.***

The proposed action would have beneficial effects on the river by allowing the channel and mouth of the river to change and migrate to the east, which would change the physical attributes of the area, returning the river to a more natural state. Beneficial impacts to wetlands may occur as the lower 900 feet of the river gains sediment, causing a shallower environment for potential wetlands to form. Riverine wetlands would expand in the area. No impacts to the floodplain would occur.

The impact analyses contained in the EA support a conclusion that no direct and adverse impacts on the National Rivers Inventory (NRI) segment or its Outstanding Remarkable Values (ORVs) are expected from the proposed action that would affect its eligibility for listing under the Wild and Scenic Rivers Act. Furthermore, no impacts to historic or cultural resources, prime farmlands, or ecologically critical areas would occur.

***(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.***

The selected alternative retains recreational boat access consistent with the General Management Plan (GMP) zoning. Changes to the natural and physical environment will be relatively unchanged through

implementation of the selected alternative. New development is not planned, NPS dredging would cease, and restoration would return natural conditions to the mouth of the Platte River. Restoration is not expected to change how the majority of users (swimming, beach users, kayaking, canoeing) recreate at Platte Point and is not expected to be highly controversial. Public comment both supported and opposed new development of an alternative boat launch. Restoration of the river mouth was generally supported with some commenters preferring to see dredging continue with alternative spoils management.

Allowing the return of natural conditions to the river mouth will have some impact on recreational boat access to Platte Bay. Boats would still be able to access Lake Michigan at the Benzie County ramp, although the ease of such access would be more dependent upon current lake levels, the location of the river mouth and the boating equipment involved. Boater safety concern garnered the greatest number of comments. Increased consideration of the difficulty and risk associated with the use of a natural river mouth access point would be required of boaters, as is the case for other unprotected boat access points. Under all alternatives environmental conditions would require boaters to be alert to lake and weather conditions.

While some of the public may believe impacts to boater safety to be controversial, 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.

Effects on the quality of the human environment are not likely to be highly controversial

***(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.***

The actions under the selected alternative will not result in highly uncertain effects or involve unknown risks. The need for boaters to consider the difficulty associated with the use of a natural river mouth access point would be required; this is a well-understood risk that exists for other unprotected boat access points. Therefore, the degree to which potential effects on the human environment are highly uncertain or involve unique or unknown risks would not be significant.

***(6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.***

No future actions are planned that would result from implementation of the selected alternative. Further, the decision to maintain a more natural lakeshore at the mouth of the Platte River does not set a precedent for future actions with significant effects.

***(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.***

Cumulative effects were determined by combining the effects of the alternative with other past, present, and reasonably foreseeable future actions. Therefore, it was necessary to identify other past, ongoing, or reasonably foreseeable future actions at the National Lakeshore and in the surrounding region. These other actions in relation to this project are intended to preserve and restore cultural resources and to improve visitor experience. Indirect cumulative impacts for all alternatives from increased recreational use are relatively small compared to current use patterns. The EA determined that no significant impacts (and no significant cumulative impacts) related to the proposed action are anticipated.

***(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.***

There are no known historic structures or cultural landscapes in the study area. If any historic structures or archeological artifacts (shipwreck pieces, dock remains, dugouts, etc) are discovered during project implementation, the NPS would stop work and evaluate per National Historic Preservation Act (NHPA) procedure and NPS policies (including consultation with the State Underwater Preserve) prior to proceeding.

***(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act.***

Beneficial impacts to piping plover critical habitat would occur from restoring the area currently consisting of spoil piles to a more natural habitat and surrounding landscape. This would provide additional habitat for piping plovers to nest within the designated critical habitat, but it may not result in improved nesting success due to the continued high recreational use expected on the east side of the riverbank. Other listed species (Pitcher's thistle, broomrape) may see increased benefits from dune restoration activities, which would allow these species to establish in the restored areas where they are not currently present. The Proposed Action may affect but is not likely to adversely affect piping plover, its critical habitat, or Pitcher's thistle.

***(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.***

The selected alternative will not violate any Federal, State, or local laws or requirements imposed for the protection of the environment. Furthermore, consultations were completed with the U.S. Fish and Wildlife Service (USFWS) under Section 7 and with the State Historic Preservation Office (SHPO) under the National Historic Preservation Act (NHPA) Section 106, as described below.

**Consultation with the USFWS.** The NPS consulted with the USFWS under Section 7 of the Endangered Species Act on November 22, 2016 regarding potential impacts of the proposed action on federally listed threatened and endangered species. The NPS determined that the proposed action and selected Alternative (Alternative 2 in the EA) "may affect but is not likely to adversely affect" the federally listed as threatened rufa red knot (*Calidris canutus rufa*), Pitcher's thistle (*Cirsium pitcheri*), and federally listed as endangered Great Lakes piping plover (*Charadrius melodius*) and its critical habitat. Other species listed in the consultation letter included the Michigan monkey-flower (*Mimulus michiganensis*), Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), or eastern massasauga (*Sistrurus catenatus*), which are either not found in the National Lakeshore or for which habitat is not present in the study area. On February 8, 2017, the USFWS concurred with the NPS further stating that "any effects of the project are insignificant and/or wholly beneficial".

**Consultation with the Michigan State Historic Preservation Office.** The Midwest Archeological Center (MWAC) conducted archeological surveys within the National Lakeshore in September 2014 and July 2016. Findings in a memorandum from a MWAC archeologist dated September 30, 2014, noted that "Because the spoil piles are, by definition, composed of disturbed materials, removing part of the piles is unlikely to cause additional damage to the dredge material, and MWAC finds no adverse effect for

proceeding with the work as planned.” A second memorandum from a MWAC archeologist dated August 30, 2016 noted similar findings, stating that “Modifying the spoil piles is unlikely to disturb any archeological deposits, as the piles are situated on top of the natural surface and any significant archeological deposits that may be at that location would be deeply buried and, therefore, unaffected by modifications to the spoil piles. Both memorandums stated that “No additional archeological work is necessary for the work to proceed as planned.”

In a letter dated December 5, 2016, the NPS notified the State Historic Preservation Officer of the availability of the EA document on the NPS PEPC website and provided excerpts of the MWAC 2014 and 2016 trip reports. In a letter dated May 3, 2017, the SHPO provided concurrence with MWAC's evaluation of the archeological implications of this project resulting in the conclusion that the project will not threaten archeological resources and had no additional comments on the project.

## **PUBLIC INVOLVEMENT**

Internal (agency) and external (public/agency) scoping occurred prior to preparation of this EA. Internal scoping on September 11, 2015 involved an interdisciplinary process to identify issues, develop a public involvement plan, identify data needs, and develop a planning process schedule. Five Preliminary alternatives were outlined based on two feasibility studies and resulting reports (Baird/USR and SFS).

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. 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 45 day public 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:

- Other Lake Access Locations
- Park Legislation/Authority
- Threatened and Endangered Species- Birds
- Other Dredging Practices
- Visitor Conflicts and Safety – Boater Safety

The top five non-substantive topics that received comments were:

- Support recreational boat access



- Support riverbank restoration
- Oppose river dredging
- Support any new facilities
- Oppose any new facilities

On November 16, 2016, SLBE released the Platte River Mouth Restoration and Access Plan EA for public review and comment. The public was invited to submit comments on the planning process, alternatives analyzed, and conclusions made through January 15, 2017. During the Public Review period, a public meeting was held at the Philip A. Hart Visitor Center Auditorium on December 7, 2016. The meeting presented information about the project background, the planning process, and plan development. 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 online through the NPS Planning, Environment & Public Comment (PEPC) website or in writing to the SLBE Superintendent.

During the 45-day review period, 41 pieces of correspondence were received from four states and Guam, a U.S. Territory. A majority of the comments received were residents of Michigan (90%). Of the comments received, 78% were from unaffiliated individuals, 10% were from governmental agencies (county, state, and federal), 7% were recreational groups, 2.5% were conservation/preservation organizations, and 2.5% were from NPS employees. Substantive issues raised within comments have been organized into seventeen subject areas. Concern statements representative of the subject areas were then developed. The Comment Summary Report is available on the PEPC website. Concern statement subject areas include:

- Visitor Conflicts and Safety:
  - Boater Safety,
  - Impacts of Proposal and Alternatives
- Alternatives:
  - Spoils Management and Uses,
  - Other Parking Locations,
  - Grant Land Back to State,
  - Other Dredging Practices,
  - Mitigation and Management Plans
- Visitor Experience: Scenic Values
- Socioeconomics:
  - Local Economy,
  - Cost to NPS
- Affected Environment:
  - Wildlife and Wildlife Habitat,
  - Threatened and Endangered Species,
  - Fish and Fisheries
- Wildlife and Wildlife Habitat: Fish and Fisheries
- Threatened and Endangered Species: Birds
- Purpose and Need: Park Legislation/Authority

- Water Resources: River and River Processes

**Michigan DNR.** The Michigan DNR was sent a scoping brochure and attended the public scoping meeting held on October 15, 2015. On December 18, 2015, the DNR provided the NPS with a letter noting the importance of protecting the resource and the protection to boaters that the current access and management provide and that they fully supported the no action alternative.

The EA document was made available to the DNR on November 16, 2016. In letters dated January 9 and 17, 2017, the DNR provided comment on the plan/EA, reiterating the importance of safe access for recreational boaters to Platte Bay and that is a high priority for the agency. The DNR stated that if new facilities at Tiesma Road were not possible, then they support the no action alternative in an effort to continue providing safe access for boaters and the fishing public in the future.

**American Indian Tribes.** Representatives of associated tribal governments were sent a copy of the scoping brochure October 1, 2015, notifying them of the NPS' intent to develop a restoration and access plan/EA and the opportunity to provide input during the public comment period. No comments were received.

In letters dated December 5, 2016, the NPS notified Tribal Historic Preservation Officers of the availability of the EA document on the NPS Planning, Environment and Public Comment (PEPC) website and provided excerpts of the Midwest Archeological Center (MWAC) 2015 and 2016 trip reports. No comments were received.

## FINDING OF NO SIGNIFICANT IMPACT

Based on a review of the facts and analysis contained in this EA (incorporated herein), the selected alternative for the Platte River Mouth Restoration and Access Plan Environmental Assessment for the National Lakeshore will not have a significant impact, either by itself or in consideration of cumulative impacts. Accordingly, the requirements of NEPA, regulations promulgated by the CEQ, and provisions for NPS Director's Order 12 and the 2015 NPS Handbook have been fulfilled.

It is my determination that the proposed action does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969, as amended, and regulations of the CEQ (40 CFR 1500 et. seq.), an environmental impact statement is not required and will not be prepared for implementation of the selected alternative.

Recommended:

      Sept. 19, 2017  
Superintendent, Sleeping Bear Dunes National Lakeshore      Date

Approved:

      9/28/17  
Regional Director, NPS Midwest Region      Date

# **SLEEPING BEAR DUNES NATIONAL LAKESHORE**

## **PLATTE RIVER MOUTH RESTORATION AND ACCESS PLAN**

### **ENVIRONMENTAL ASSESSMENT**

#### **APPENDIX 1: DETERMINATION OF NON-IMPAIRMENT**

Actions that require preparation of an Environmental Assessment (EA) or Environmental Impact Statement (EIS) constitute actions that may have the potential to impair park resources or values. The National Park Service (NPS) *Management Policies 2006* defines impairment as an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunity that otherwise would be present for the enjoyment of those resources or values. An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Park resources and values subject to the no-impairment standard include:

- The park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals.
- Appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them.
- The park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system.

- Any additional attributes encompassed by the specific values and purposes for which the park was established.

A non-impairment determination must include a discussion, for each impacted resource analyzed in detail in the associated EA or EIS, of why the selected action's impacts will not result in impairment. The impairment determination does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, environmental justice, land use, park operations, etc., as these do not constitute impacts to park resources and values subject to the non-impairment standard.

### **Wildlife and Wildlife Habitat**

Ecological communities present within the National Lakeshore include wetlands, aquatic areas, coastal forests, dune systems, and open fields. Dunes and coastal forests, the predominant community types present within the EA study area, provide habitat for a variety of wildlife species that have been documented at the National Lakeshore. Open fields and dunes provide valuable habitat for grassland nesting birds in the summer and other wildlife throughout the year.

Cessation of dredging is not anticipated to measurably change the condition or size of existing aquatic habitats in the area, and no effects, beneficial or otherwise, would be anticipated on aquatic habitat. With the cessation of dredging activities, boat use at the mouth of the Platte River may decrease, as deposited sediment at the mouth may limit the size of boat able to pass from the river to the lake. Less boat traffic may have a beneficial impact on wildlife species in the area, as there may be less boat noise and human activity and some wetland species may re-establish. However, Platte Point would continue to attract a high number of visitors for recreational activities during the summer months. With the continued use of the area for other recreational activities, wildlife may continue to avoid the area due to human activity. Overall, the proposed action will not result in impairment to the National Lakeshore's wildlife and wildlife habitats.

### **Threatened and Endangered Species**

Based on data from the U.S. Fish and Wildlife Service Information for Planning and Conservation (IPaC) system, several threatened and endangered species were identified that are known to occur in the vicinity of the EA study area. In addition to the presence of a number of state and federally protected species, almost the entire study area is located within designated Critical Habitat for the federally listed endangered piping plover. The area surrounding Platte Point provides suitable and regularly utilized nesting habitat for the piping plover.

Restoration of the area currently consisting of dredge spoil piles to a more natural habitat and surrounding landscape would provide beneficial impacts to piping plover critical habitat by providing additional nesting habitat. However, this would not necessarily result in improved nesting success due to the high recreational use of the area. Other federal and state listed species (Pitcher's thistle and broomrape) may see increased benefits from dune restoration activities, which would allow these species to establish in the restored areas where they are not currently present. Overall, the proposed action will not result in impairment to threatened and endangered species at the National Lakeshore.

## Vegetation

Vegetative communities present within the National Lakeshore include: Great Lakes Beachgrass Dune, Great Lakes Coast Pine Barrens, Great Lakes Dune Pine Forest, Great Lakes Juniper Dune Shrubland, Jack Pine - Northern Pin Oak Forest, Northern Red Oak - Sugar Maple Forest, Sand Cherry Dune Shrubland, and White Pine - Red Oak Forest.

The study area is located entirely within an area mapped by the Michigan Department of Environmental Quality (MDEQ) as a Critical Dune Area (CDA). These areas are dunes that are considered to be sensitive to disturbance and occupy approximately 70,000 acres along the shorelines of Lake Michigan and Lake Superior. Dunes and shoreline habitats present harsh growing conditions characterized by strong winds, shifting sands, dry conditions, and seasonally high surface temperatures. Vegetation starts just behind the “storm beach” of Lake Michigan, which is generally devoid of vegetation due to high waves, ice, and drifting sands. The first dunes behind the storm beach support sparse pioneer plants, such as American beachgrass (*Ammophila breviligulata*), Pitcher’s thistle (*Cirsium pitcheri*), sand cherry (*Prunus pumila*), and beach pea (*Lathyrus japonicus*). Inland from the pioneer plants, in more stabilized areas of the dunes are intermediate and later successional grass, forb, and shrub species.

Impacts to vegetation would be beneficial as less favorable plant species would be removed from the river bank area and natural dune conditions along with sensitive dune species would be re-established. Overall, the proposed action will not result in impairment to vegetative communities at the National Lakeshore.

## Water Resources

The National Lakeshore contains a wide variety of water resources including Lake Michigan, the Platte River, various types of wetlands, and floodplains. The Platte River originates at Lake Ann in Grand Traverse County, runs through Leelanau and Benzie Counties and empties into Lake Michigan. Approximately 4.6 miles of the river are located within the National Lakeshore. Within this reach there are several recreational developments including boat launch ramps and campgrounds. Most of the river supports canoeing, kayaking, and fishing activities.

Cessation of dredging and restoration of the river mouth would allow the river channel and mouth of the river to change and migrate to the east, which would change the physical attributes of the area, returning the river to a more natural state. Beneficial impacts to riverine wetlands may occur as the lower 900 feet of the river gains sediment, causing a shallower environment for potential wetland vegetation. No impacts to floodplain would occur. Overall, the proposed action will not result in impairment to water resources at the National Lakeshore.