

**UNITED STATES DEPARTMENT OF INTERIOR  
NATIONAL PARK SERVICE**

**FINAL GENERAL MANAGEMENT PLAN / WILDERNESS STUDY /  
ENVIRONMENTAL IMPACT STATEMENT  
SLEEPING BEAR DUNES NATIONAL LAKESHORE  
Benzie and Leelanau Counties, Michigan**

The Department of the Interior, National Park Service, has prepared this Record of Decision on the *Final Sleeping Bear Dunes National Lakeshore General Management Plan / Wilderness Study / Environmental Impact Statement (GMP/WS/EIS)*. This Record of Decision includes a description of the purpose and need for the project; alternatives considered; the preferred alternative; dismissed alternatives (none); the environmentally preferable alternative; mitigative measures; public and agency involvement; the basis for the decision; findings on impairment of park resources and values; and a conclusion.

**PURPOSE AND NEED**

General management plans are required for all units of the national park system and are intended to establish the future management direction of a park unit. This *General Management Plan* will provide comprehensive guidance for perpetuating natural systems, preserving cultural resources, and providing opportunities for quality visitor experiences at Sleeping Bear Dunes National Lakeshore (hereafter referred to as National Lakeshore, Lakeshore, or park). The purpose of this plan is to decide how the National Park Service can best fulfill the National Lakeshore's purpose, maintain its significance, and protect its resources unimpaired for the enjoyment of present and future generations. The National Lakeshore's last *General Management Plan*, completed in 1979, is outdated. New areas have been added to the Lakeshore, many individual parcels within the original boundary have been acquired, new information about the significance of natural and cultural resources in the Lakeshore has been recognized, and private development adjacent to and near the National Lakeshore has increased. The National Lakeshore faces new management challenges as a result of all these changes.

Wilderness, which can be designated only by Congress, provides for permanent protection of lands in their natural condition that provide outstanding opportunities for solitude or primitive and unconfined recreation. Wilderness studies typically result in a recommendation to Congress to designate all, some, or none of the lands possessing wilderness character as part of the national wilderness preservation system. The Wilderness Study element of this new *General Management Plan* is needed because of public interest in developing a proposal that improves upon the 1981 "Wilderness Recommendation" for Sleeping Bear Dunes National Lakeshore. Based on the Wilderness Study included in this document, the National Park Service anticipates preparing a proposal for such a recommendation to forward to the Department of the Interior at the conclusion of this planning effort. However,

by law, areas proposed as wilderness in the 1981 recommendation for the National Lakeshore will be managed as wilderness until Congress acts on a new wilderness recommendation.

## ALTERNATIVES CONSIDERED

Five alternatives for managing the National Lakeshore for the next 20 or more years were analyzed in the *GMP/WS/EIS*. The **no-action alternative** reflects current conditions and activities at the Lakeshore; it is provided as a baseline against which to compare the other alternatives. It also includes 30,903 acres managed to maintain their existing wilderness character (as per law and policy). In the **preferred alternative**, the Lakeshore is valued primarily for preservation of its natural resources, and for the opportunities it provides for visitor enjoyment of the natural, cultural, and recreational resources in a scenic outdoor setting. Lands proposed for wilderness designation include 32,100 acres and no developed county roads. In **alternative A**, the Lakeshore is valued primarily for conservation of its natural resources. Lands proposed for wilderness designation include 33,600 acres and no developed county roads. In **alternative B**, the Lakeshore is valued primarily for its recreational opportunities in scenic outdoor settings. Lands proposed for wilderness designation include 14,400 acres and no county roads. In **alternative C**, the Lakeshore is managed so that most visitor use is concentrated in selected areas, with more natural, primitive conditions promoted in the rest of the Lakeshore. Lands proposed for wilderness designation include 23,200 acres and no developed county roads.

Four management zones are applied to Lakeshore lands and waters in each of the alternatives. The **high use zone** provides for visitor orientation, education, and other structured activities where high numbers of visitors can enjoy and learn about the National Lakeshore. The **experience history zone** is managed primarily to preserve historic structures and landscapes with moderate to high numbers of visitors enjoying and learning about significant historic activities, buildings, and landscapes. The **recreation zone** provides a wide range of recreational opportunities for moderate numbers of visitors. The **experience nature zone** is the wildest, most natural management zone where low numbers of visitors enjoy primitive recreation on foot or in nonmotorized watercraft. This is the only management zone in which wilderness may occur.

## PREFERRED ALTERNATIVE

Under the preferred alternative, the Lakeshore will be valued primarily for preservation of its natural resources and for the opportunities it provides for visitor enjoyment of natural, cultural, and recreational resources in a scenic outdoor setting. About 32,100 acres (45 percent of the National Lakeshore) in the north, central, south, and island areas of the Lakeshore will be proposed as wilderness. No developed county roads are within areas proposed for wilderness.

Based on the emphasis placed on natural resource conditions and experiences in this alternative, the experience nature zone will extend across much of the Lakeshore. Some selected areas will be zoned high use or recreation to allow for possible future recreational opportunities.

Based on the emphasis placed on opportunities for enjoyment of cultural resources in this alternative, the experience history zone will encompass most of the National Lakeshore's historic resources.

Historic structures and landscapes will be preserved at a minimum and managed as specified for the management zone in which they lie.

Visitor orientation services, interpretive activities, visitor access and facilities, and recreational opportunities will remain much as they are now except that a few trails and backcountry campgrounds will be added and new designated campgrounds will be provided on North Manitou Island. Valley View campground will be removed; parking at the end of Esch Road (and possibly at Platte River Point) will be improved; the possibility of improved boat access near Platte River Point could be studied; motorized boats will not be allowed on North Bar Lake; electric motors will be allowed on Bass Lake (Leelanau County), Tucker Lake, and Otter Lake; there will be improved access at some inland lakes; the Glen Lake picnic area will be upgraded; occasional ferry service for day trips to North Manitou Island will be allowed; concession auto tours to near the Giant Cedars area will be considered; and the Crystal River access area will be upgraded or relocated.

The National Park Service will continue to acquire lands within the Benzie Corridor on a willing-seller basis (subject to available funding) for future development of a scenic road and/or a bike/hike trail (determined and evaluated via a future study). The road/trail would not be expected to be built within the life of this plan.

The key impacts associated with implementing this alternative will be in the areas of visitor opportunities and use and wilderness character. Increased access and visitor opportunities related to additional recreation-oriented facilities will have a long-term, moderate beneficial impact on visitor opportunities and use. Implementation of user capacity management strategies will have a long-term, minor beneficial impact on visitor opportunities, but potentially long-term minor adverse effects on use. The removal of Valley View campground and disallowing gas-powered motorboats on two inland lakes will have long-term, minor, adverse impacts on visitor opportunities and use. The increased visitor opportunities and facilities will have a long-term, minor, adverse impact on natural sound and the night sky. Impacts on historic resources, natural resources, regional socioeconomics, and National Park Service operations will not differ substantially from the no-action alternative.

Wilderness studies typically result in a recommendation to Congress to designate all, some, or none of the lands possessing wilderness character as part of the national wilderness preservation system. Based on this *GMP/WS/EIS*, the National Park Service anticipates preparing a proposal for such a recommendation to forward to the Department of the Interior at the conclusion of this *GMP/WS/EIS* planning effort. However, because of the 1982 amendment (P.L. 97-361) to the Lakeshore's enabling legislation, areas proposed as wilderness in the 1981 recommendation will be managed as wilderness until Congress acts on a new wilderness recommendation. If Congress designates wilderness for the Lakeshore as described in the preferred alternative, establishment of 32,100 acres of designated wilderness in all three portions of the mainland and on both islands will permanently protect wilderness values (naturalness and opportunities for solitude or primitive, unconfined recreation). Impacts of the preferred alternative on wilderness character will be mostly beneficial, moderate, and long term (permanent), but there will also be some localized, minor adverse impacts.

## **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

The environmentally preferable alternative is the alternative that promotes the national environmental policy expressed in the National Environmental Policy Act (Sec. 101(b)). This includes alternatives

that 1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; 2) ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings; 3) attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences; 4) preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice; 5) achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and 6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources" (National Park Service DO-12 Handbook, Section 2.7D).

The alternatives do not differ much with respect to criteria 2 and 6; therefore the evaluation focuses on criteria 1, 3, 4, and 5.

The no-action alternative represents "business as usual" and was included to provide a baseline against which to compare the effects of the other (action) alternatives. The no-action alternative realizes criterion 1 in that most of the Lakeshore would be managed as rather natural, and large areas would be managed to maintain their existing wilderness character. The no-action alternative would not fully realize criteria 3, 4, and 5 to the same extent as alternatives B, C, and the preferred alternative because it has fewer recreational opportunities.

The preferred alternative proposes managing much of the National Lakeshore as the experience nature zone, provides limited new recreational opportunities, proposes substantial amounts of designated wilderness, and protects the National Lakeshore's fundamental resources and values; as such it realizes criteria 1, 3, 4, and 5.

Alternative A realizes criterion 1 by managing most of the Lakeshore as the experience nature zone and by proposing substantial amounts of designated wilderness. Because it proposes a narrower range of recreational opportunities (and fewer such opportunities) than alternatives B, C, and the preferred alternative, alternative A does not realize criteria 3, 4, and 5 to the same extent as these alternatives.

Alternative B realizes many aspects of criteria 3, 4, and 5 by providing a relatively wide range of and more new recreational opportunities. Alternative B realizes criterion 1 to a lesser degree than the other alternatives due to the more limited extent of the experience nature zone and its modest wilderness proposal.

Alternative C realizes criterion 1 to a lesser extent than the preferred alternative and alternative A, and to a greater extent than alternative B, based on the relative proportions of management zones and its moderate wilderness proposal. However, similar to alternative B and the preferred alternative, alternative C realizes many aspects of criteria 3, 4, and 5 by providing a relatively wide range of and more new recreational opportunities.

After considering the environmental consequences of the five management alternatives, including consequences to the human environment, the National Park Service concluded that the preferred alternative is also the environmentally preferable alternative. By a slight margin over alternative C, this alternative best realizes the full range of national environmental policy goals as stated in section 101 of the National Environmental Policy Act.

## MITIGATIVE MEASURES

In the legislation that created the National Park Service, Congress charged the agency with managing lands under its stewardship “in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (National Park Service Organic Act). As a result, the National Park Service routinely considers and implements mitigative measures whenever activities that could adversely affect the resources or systems are anticipated. Mitigation means to take action to avoid, reduce, or compensate for the effects of environmental damage.

The following sections summarize mitigative measures that will be applied in the implementation of this *GMP/WS/EIS*.

### General

New facilities (e.g., campsites, trails, bicycle trails) will be sited to minimize impacts on resources. Before any construction activity, construction zones will be identified with temporary fencing to confine disruptions to the minimum area required. All protection measures will be clearly stated in the construction specifications. Construction activities will implement standard soil erosion and storm-water runoff prevention methods.

Outdoor lighting for new or rehabilitated facilities will be the minimum amount required to provide for personal safety. Lights will also be shielded and/or directed downward to minimize impact on the night sky. Standard noise abatement measures will be implemented, as appropriate, during park operations and construction activities.

### Cultural Resources

**Archeological Resources.** Funding for a comprehensive archeological survey for the National Lakeshore has been requested and site-specific surveys continue to be conducted in the interim. As appropriate, archeological surveys and/or monitoring will precede any construction. Known archeological resources will be avoided to the greatest extent possible. If archeological resources listed in or eligible for listing in the national register could not be avoided, an appropriate mitigation strategy will be developed in consultation with the state historic preservation officer and, if necessary, associated American Indian tribes. If during construction previously undiscovered archeological resources were uncovered, all work in the immediate vicinity of the discovery will be halted until the resources could be identified and documented and an appropriate mitigation strategy developed in consultation with the state historic preservation officer and, if necessary, associated American Indian tribes.

**Human Remains.** In the event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001) and other applicable laws will be followed.

**Ethnographic Resources.** Sleeping Bear Dunes National Lakeshore staff will consult with associated American Indian tribes to develop and accomplish programs in a way that respects the beliefs, traditions, and other cultural values of the American Indian tribes who have ancestral ties to National Lakeshore lands. National Park Service staff will maintain government-to-government relations with

associated tribes to ensure a collaborative working relationship, and will consult regularly with them before taking actions that will affect natural and cultural resources that are of interest and concern to them.

**Historic Structures and Landscapes.** All structures and landscapes in the National Lakeshore have been or are being inventoried and evaluated using the criteria of the National Register of Historic Places. Not all of these structures and landscapes have been fully documented and submitted to the keeper of the national register. Until that action has occurred, however, all properties listed on or appearing to meet national register criteria will be treated as though they are listed. No action affecting any of these resources may proceed without appropriate consultation with the state historic preservation officer and documentation of the action under Section 106 of the National Historic Preservation Act of 1966, as amended, as promulgated under the Advisory Council on Historic Preservation's "Regulations for the Protection of Historic and Cultural Properties" (36 CFR 800).

### **Natural Resources**

**General.** For the concessions farm tour to near the Giant Cedars, tour vehicles could travel as far as the end of the county road. From there, visitors will continue on foot for a short distance to the trees. Mitigating measures will be used as needed to prevent visitor-use-related impacts to the cedar trees.

Activities with the potential to disturb natural resources will be monitored for use-related impacts. Management options could range from (a) placing structures to limit impacts (e.g., sand ladders and boardwalks) or redirect visitors (i.e., fences), (b) education, (c) guided activities, and (d) limiting access through a permit system.

**Wetlands.** Trails and other developments will avoid wetlands and "Waters of the United States" to the extent feasible. Where crossing or impingement upon wetlands is unavoidable, design and construction will minimize impacts on the wetlands. All potential impacts on wetlands will require state and federal permits.

**Geology and Soils.** Structures such as sand ladders, boardwalks, and sidewalks will be used to reduce impacts to the substrate, and silt fences will be used to control erosion and runoff. Steep slopes and inundated areas will be avoided.

**Vegetation and Wildlife.** Trails/paths will be placed as close to existing disturbances as possible. The construction footprint will be minimized for both temporary and permanent impacts. Construction will take place outside peak breeding and nesting seasons.

**Threatened and Endangered Species.** Surveys will be conducted, as appropriate, for threatened and endangered species and species of concern before ground-disturbing activities are undertaken. Impacts on three federally threatened or endangered species are analyzed in detail in the *General Management Plan / Wilderness Study / Environmental Impact Statement* — the piping plover (and piping plover critical habitat), the Michigan monkey flower, and the Pitcher's thistle.

Conservation measures will be undertaken to reduce potential impacts on federally listed species or candidate species as needed. These conservation measures will be based on the recommendations provided by the U.S. Fish and Wildlife Service, and will likely include, but would not be limited to, the following:

- Protecting piping plovers by fencing or another system designed to prevent impacts from human activity and discourage predators.
- Restricting dogs from piping plover breeding areas during the breeding season.
- Providing education about species and habitats.
- Designating alternate access points.

## **PUBLIC AND AGENCY INVOLVEMENT**

### **General Public**

Prior to the official start of this planning process, the National Park Service held 35 meetings with 793 people, increasing public awareness of the wilderness situation at the National Lakeshore and hearing from the public their preferences for resolution. Primarily as a result of these meetings, the National Park Service decided to begin a new general management planning process that included a Wilderness Study.

The public was notified of this Sleeping Bear Dunes planning effort via: (1) a *Federal Register* notice of intent, dated December 28, 2005, to prepare an environmental impact statement; (2) distribution of the first newsletter for this effort in January 2006; and (3) a press release announcing a public comment opportunity, including public scoping meetings for the general management plan.

Throughout the *GMP/WS/EIS* process, National Lakeshore staff conducted an extensive public involvement and outreach program. Newsletters and both the draft and final plans were available online, as were other documents related to this planning effort (e.g., public comment summaries, frequently asked questions, letters, and planning updates from the superintendent). An interactive web forum related to the planning effort was also available.

Using input from the public and considering the probable environmental consequences and costs of the alternatives, the planning team developed the preferred alternative. The *Draft GMP/WS/EIS* was then produced and distributed for public review beginning April 7, 2008; the comment period ended on June 15, 2008. Public hearings were held in Honor, Traverse City, and Glen Arbor, Michigan, on June 3, 4, and 5, 2008, respectively, with a total of 196 people attending. A total of 292 comments were received via letters, electronic mail messages, Web responses, and comments transcribed from the public hearings. Comments came from 20 different states. Many other meetings and a radio broadcast regarding the draft plan were attended by park staff, for example, congressional briefings and meetings with road commissions, friends groups, federal agencies, state agencies, and townships.

Public comment received on the *Draft GMP/WS/EIS* showed broad support for the Preferred Alternative, and the wilderness proposal, resource protection, and recreational/access improvements it called for. An abbreviated summary of the comments follows:

- There was a great deal of support for the preferred alternative including the wilderness proposal from the general public, local, state and federal government agencies, tribes and non-governmental organizations. Regarding the Benzie Corridor, the most support was for the preferred alternative's proposal to continue National Park Service acquisition of lands within the corridor for a future decision on whether to construct a trail and/or a scenic roadway.

- There was a great deal of support for the preservation of historic resources. Many comments were received suggesting that cultural resource preservation be added to the purpose statement.
- There was moderate support for new bicycling opportunities, including those included in the preferred alternative.
- Some concern was expressed about whether the M-22/M-109 hike/bike trail might impact private property owners and a moderate number of comments expressed concern about the nature of improvements to the Esch Beach parking area.

In addition to comments on the draft plan, many comments suggested adding equestrian opportunities in the park and a moderate number of comments suggested establishing a clothing-optional beach.

The preferred alternative was revised slightly based on input received on the draft plan. Perhaps the most significant changes are that the Cottonwood Trail into the dunes from the Pierce Stocking Scenic Drive was removed from proposed wilderness, and electric motors will be allowed on Otter, Tucker, and Bass (Leelanau County) lakes. Information on changes to the preferred alternative between the draft and final plans, as well as information on substantive comments on the draft plan can be found in the “Comments on, Changes to, and Responses to Comments on the Draft Plan” section in chapter 6 of the final plan.

In October 2008, the *Final GMP/WS/EIS* was made available to the public in hard copy, CD, on the Lakeshore’s website, and at local libraries. A 30 day no-action period followed.

By the time of printing the *Final GMP/WS/EIS*, National Park Service staff had held more than 90 informational meetings with the general public and dozens of groups or representatives upon their request. More than 2,500 people in total attended these meetings.

### **U.S. Fish and Wildlife Service**

The National Park Service first contacted the U.S. Fish and Wildlife Service (USFWS) in February 2006 advising them of the National Park Service planning process for this *GMP/WS/EIS*. In March 2006, the USFWS provided the Lakeshore with a list of federally listed threatened, endangered, or candidate species found within the National Lakeshore. In September 2007, the two agencies agreed that a biological assessment should not be prepared in association with this *GMP/WS/EIS* because of the plan’s broad and strategic nature. However, the National Park Service will consult with the USFWS on subsequent, more detailed, implementation plans to determine if Section 7 consultation is necessary.

A letter dated June 16, 2008, from the East Lansing Field Office of the USFWS provided comments on the draft preferred alternative in relation to section 7 of the Endangered Species Act. This office concurred with the National Park Service determination that implementing the preferred alternative may affect but not likely adversely affect Pitcher’s thistle, Michigan monkey flower, piping plover or piping plover critical habitat. Effects of the proposed alternative are considered insignificant, dis-countable, or beneficial. This precludes the need for further action on this project as required under section 7 of the Act.

The USFWS noted, however, that if the project plans change or elements of the preferred alternative are modified, consultation should be reinitiated.

#### **U.S. Environmental Protection Agency**

The National Park Service included the U.S. Environmental Protection Agency on the project's mailing list. A letter dated June 9, 2008, from the Chicago office of the Environmental Protection Agency provided comments on the draft plan. This office rated the draft plan preferred alternative as "LO (Lack of Objection)."

#### **Michigan State Historic Preservation Officer**

The National Park Service contacted the Michigan state historic preservation office in February 2006 to advise them about the start of the *GMP/WS/EIS* process. In March and September 2007, National Lakeshore managers met with representatives from the Michigan state historic preservation office to discuss the planning process and historic properties within the National Lakeshore.

A letter dated July 7, 2008, from Brian Conway, the state historic preservation officer (in the Michigan Department of History, Arts, and Libraries in Lansing, Michigan) provided comments on the draft plan. Mr. Conway stated:

Based on the information provided for our review, it is the opinion of the State Historic Preservation Officer (SHPO) that the preferred alternative identified in the GMP does not meet the criteria of adverse effect [36CFR section 800.5(a)(1)] and will have no adverse effect [36CFR section 800.5(b)] on historic properties within the area of potential effects  
...

#### **Michigan Department of Environmental Quality & Department of Natural Resources**

The National Park Service contacted the Chief of the Coastal Zone Management Program (Michigan Department of Environmental Quality) in May 2006. That office responded with a letter in June 2006. Lakeshore managers met with representatives from the Michigan Departments of Natural Resources and Environmental Quality in April 2007, to discuss the planning process. The Michigan Coastal Zone Management Program was provided the opportunity to review the *Draft General Management Plan / Wilderness Study / Environmental Impact Statement*.

A letter dated June 23, 2008, from the state Department of Environment Quality provided comments on the draft plan. That office stated:

[W]e strongly support the Preferred Alternative . . . . The Preferred Alternative strikes a good balance between protecting sensitive coastal resources and providing ample opportunity for visitor access and recreation. Activities such as controlling invasive species, protecting open dune areas, restoring disturbed sites, and protecting threatened and endangered species are all consistent with the goals of the Coastal Management Program and the DEQ.

This office also noted there were activities identified in the preferred alternative that will require state permits.

A letter dated June 9, 2008, from the state Department of Natural Resources provided comments on the draft plan. That office:

supports the work of the National Park Service and their planning partners in the development of the “Preferred Alternative,” and we endorse that recommendation. The preferred plan is the result of a planning process that demonstrated an impressive effort to engage the public and stakeholders.

### **American Indian Tribes**

The National Park Service contacted the following five American Indian tribal groups in a letter dated February 16, 2006: Bay Mills Indian Community, Grand Traverse Band of Ottawa and Chippewa Indians, Little River Band of Ottawa Indians, Little Traverse Bay Bands of Odawa Indians, and Sault Ste. Marie Tribe of Chippewa Indians. The National Park Service letter advised the tribes of the planning process, invited them to participate in planning, and inquired about the tribes’ potential interests and concerns as they relate to the planning effort.

On July 18, 2006, Lakeshore managers met with representatives of the Grand Traverse Band of Ottawa and Chippewa Indians to discuss the *GMP/WS/EIS*. During that meeting, the Grand Traverse Band representatives explained that the other tribal groups had authorized them (Grand Traverse Band) to represent the other tribal groups in the National Lakeshore’s planning process.

In August 2006, the Grand Traverse Band reviewed and provided input on the National Lakeshore’s draft interpretive themes. In March 2007, the National Park Service sent a letter to the Grand Traverse Band and offered to present the preliminary alternatives and answer any questions; this meeting took place in April. In response to a May 2007 letter from the Grand Traverse Band, National Lakeshore staff met with the Band again in June 2007 to discuss their comments in more detail.

A letter dated June 18, 2008, from the Grand Traverse Band of Ottawa and Chippewa Indians provided comments on the draft plan. The tribe fundamentally supported the preferred alternative because it “provides a good mix of enjoyment opportunities to the public as well as resource protection,” although slight modifications were suggested. The tribe expressed interest in continued communication with National Park Service staff.

### **DECISION**

The National Park Service will implement the preferred alternative as described in the *Final Sleeping Bear Dunes National Lakeshore General Management Plan / Wilderness Study / Environmental Impact Statement*. This alternative constitutes the National Park Service’s selected action for the National Lakeshore.

## **BASIS FOR THE DECISION**

After reviewing the public comments on the preliminary alternatives, the planning team used an evaluation process called “Choosing by Advantages” to evaluate the four preliminary alternatives (no action, alternative A, alternative B, and alternative C). In using this process, the planning team considered, “What and how large are the advantages of each alternative?” (with respect to environmental impacts, operational impacts, etc.), “How important are these advantages?”, and finally “Are these advantages worth their associated costs?” The process focuses on the differences between alternatives and determining how important those differences (advantages) are. After addressing the Choosing by Advantages questions in detail, the team used the resulting information to develop the draft preferred alternative. Alternative A provided the overall best value (greatest total advantage for the cost expended). Thus, to build the draft preferred alternative, the team started with alternative A, then studied the Choosing by Advantages results to see where elements of other alternatives could be incorporated (or substituted for elements of alternative A) to add advantages with minimal additional cost.

The draft preferred alternative was presented in the *Draft GMP/WS/EIS*. Based on public, agency, state, and tribal comments on the draft plan, very minor changes were made to the preferred alternative as described in the *Final GMP/WS/EIS*.

The preferred alternative incorporates elements that people liked best; it also represents a good balance among the wide range of interests people have in the National Lakeshore. The preferred alternative strikes a balance that the vast majority of people support because it maintains a variety of recreational opportunities while continuing to preserve and protect the natural and cultural resources of the Lakeshore.

## **FINDINGS ON IMPAIRMENT OF PARK RESOURCES AND VALUES**

The National Park Service may not allow the impairment of park resources and values unless directly and specifically provided for by legislation or proclamation establishing the park. Impairment that is prohibited by the National Park Service Organic Act and the General Authorities Act is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. In determining whether impairment would occur, park managers examine the duration, severity, and magnitude of the impact; the resources and values affected; and direct, indirect, and cumulative effects of the action. According to National Park Service policy, “an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is: a) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; b) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or c) identified as a goal of the park’s general management plan or other relevant National Park Service planning documents.”

This policy does not prohibit all impacts to park resources and values. The National Park Service has the discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of the park, so long as the impacts do not constitute impairment. Moreover, an impact is less likely to constitute impairment if it is an unavoidable result, which cannot be further mitigated, of an action necessary to conserve or restore the integrity of park resources or values.

After analyzing the environmental impacts described in the *Final GMP/WS/EIS* and public comment received, the National Park Service has determined that implementation of the preferred alternative will not constitute an impairment to the Lakeshore's resources and values.

## CONCLUSION

The preferred alternative provides the means for meeting the National Park Service's purposes, goals, and criteria for managing Sleeping Bear Dunes National Lakeshore and for meeting national environmental policy goals. Selection of the preferred alternative, as reflected by the analysis contained in the environmental impact statement, will not result in the impairment of park resources and will allow the National Park Service to conserve National Lakeshore resources and provide for their enjoyment by visitors. As described in the mitigation measures section, all practical means to avoid or minimize environmental harm in the implementation of the preferred alternative will be adopted.

Recommended:

 Date 1/5/2009  
Dusty Shultz, Superintendent  
Sleeping Bear Dunes National Lakeshore

Approved:

 Date 1-6-2009  
Ernest Quintana, Regional Director  
Midwest Regional Office, National Park Service