PLANNING PROCESS AND HISTORY OF PUBLIC INVOLVEMENT FOR THIS PROJECT

SUMMARY OF PUBLIC INVOLVEMENT

In the summer of 1999 the public was notified of the Pictured Rocks general management plan effort by means of Newsletter 1 and announcements in the media. Part of the framework for the plan (and the first task for the planning team) was to reaffirm the purpose, significance, and mission for the national lakeshore. In Newsletter 1 the public was asked to review the lakeshore’s purpose, significance, and mission statements. The first newsletter also asked the public to comment on a list of preliminary topics and issues to be addressed in the plan (also see appendix G).

Nearly 300 written comments were received in response to Newsletter 1. Additional comments were provided by people who attended a series of public scoping meetings held in August and September 1999 in Novi, Grand Rapids, Grand Marais, and Marquette, Michigan and in Green Bay, Wisconsin. The rest of the national lakeshore staff (those not on the planning team) were introduced to the planning process, and their comments were solicited as part of the planning process.

Newsletter 2, issued in November 1999, provided information on several topics. It summarized public response to the first newsletter and announced that a wilderness study would be prepared as part of the general management plan. It presented draft general management plan “decision points,” which are the key questions the plan needs to answer. It also introduced and asked for public input on management prescriptions, which identify a range of ways to manage resources and provide for different experiences in the national lakeshore. More than 250 comments were received in response to Newsletter 2.

The results of the public responses to Newsletter 2 were summarized in May 2000 in Newsletter 3. This newsletter also presented revised management prescriptions and five draft alternative concepts. In June 2000 public meetings were held in Lansing, Grand Marais, and Wetmore, Michigan to provide another way for the public to learn about the alternatives, ask questions about them, and share ideas with the planning team. A total of 107 persons attended the meetings, and more than 500 written responses were received. Using input from the public and considering the probable environmental consequences and costs of the alternatives, the planning team developed a preferred alternative. A Draft Pictured Rocks National Lakeshore General Management Plan and Wilderness Study Environmental Impact Statement was produced and distributed for public review.

All newsletters and draft documents were also available online at www.nps.gov/piro

A Federal Register notice and media announcements initiated the beginning of a formal public comment period on the Draft General Management Plan and Wilderness Study / Environmental Impact Statement. All interested agencies, groups, and individuals were invited to review the document and submit comments.

The date, time, and locations of the five public meetings were announced in the local media and in the transmittal letter that accompanied the draft document that was sent to the 3,200 people on the mailing list. The availability of the Final General Management Plan and Wilderness Study / Environmental Impact Statement as also announced in the Federal Register.
SUMMARY OF THE PUBLIC MEETINGS ON THE DRAFT GENERAL MANAGEMENT PLAN AND WILDERNESS STUDY / ENVIRONMENTAL IMPACT STATEMENT

Five public open houses were held throughout Michigan during the comment period; two of these meetings also included formal hearings on wilderness. The open houses were held in Marquette (August 25, 2003), Munising (August 26), Grand Marais (August 27), Lansing (August 28), and Novi (August 28). A total of 129 people attended the open houses. Most of the people came because they were interested in learning more about the general management plan and wilderness study. An official transcript was prepared of the two wilderness hearings.

In accordance with Wilderness Act requirements, formal public hearings were held at the Munising Community Credit Union on August 26, and at the Burt Township Public School in Grand Marais on August 27. Each participant was allocated four minutes, and their comments were recorded and transcribed by a professional court reporter. In all, 21 people spoke at the Munising hearing and four people spoke at the Grand Marais hearing. Of those who spoke in Munising, seven people supported wilderness (either expressing support for wilderness or for an alternative that proposed wilderness) and 14 people opposed wilderness. Of the people who spoke in Grand Marais, three people supported wilderness (either expressing support for wilderness or for an alternative that proposed wilderness), while one person did not appear to favor or oppose wilderness. Copies of the hearing transcripts can be seen at the Pictured Rocks National Lakeshore headquarters in Munising.

CONSULTATION

In accordance with Section IV of the 1995 programmatic agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, certain undertakings require only internal NPS review for Section 106 purposes. Other undertakings require standard Section 106 review in accordance with 36 CFR 800, and in those instances the National Park Service consults as necessary with the state historic preservation officer, the Advisory Council on Historic Preservation, tribal officials, and other interested parties.

NPS staff met with Mr. Eugene Big Boy, Tribal Chairman of the Bad River Band (Wisconsin) of the Lake Superior Ojibwa Tribe. There are about 1,500 members of the tribe on the reservation and some 7,000 nationwide. Mr. Big Boy did not have any immediate concerns and expressed interest in keeping informed of planning for the general management plan and other activities within the Pictured Rocks National Lakeshore.

Other affiliated tribes were contacted via letter and phone calls but did not elect to meet with national lakeshore staff. No comments were received.

A letter requesting comments was sent to tribal chairpersons on July 23, 2003. The Draft General Management Plan was either included with the letter or sent under separate cover. The following tribes were sent letters and the draft plan:

- Bay de Noc Indian Cultural Association
- Bay Mills Indian Community of the Sault Ste. Marie Band of Chippewa Indians
- Bad River Band of the Lake Superior Tribe of Chippewa Indians
- Forest County Potawatomi Community of Wisconsin Potawatomi Indians
- Grand Traverse Band of Ottawa and Chippewa Indians of Michigan
Hannahville Indian Community of Wisconsin Potawatomi Indians of Michigan
Ho-Chunk Nation
Keweenaw Bay Indian Community
Lac Courte Oreilles Band of Lake Superior Chippewa Indians
Lac du Flambeau Band of Lake Superior Chippewa Indians
Lac Vieux Desert Band of Lake Superior Chippewa
Little Traverse Bay Bands of Odawa Indians
Menominee Indian Tribe of Wisconsin
Red Cliff Band of Lake Superior Chippewa Indians
Saginaw Chippewa Indian Tribe of Michigan
Sault Ste Marie Tribe of Chippewa Indians
Stockbridge Munsee Community of Mohican Indians
St. Croix Chippewa Indians of Wisconsin
Sokoagon Chippewa Community Mole Lake Band

No responses were received from the tribes. Thus, another letter and copy of the draft management plan was mailed on February 9, 2004.

One response, from the Lac du Flambeau Band of Lake Superior Chippewa Indians, was received on March 10, 2004. The tribe indicated that it had no comments related to the plan.

Phone calls were placed to the Bay Mills Indian Community of the Sault Ste. Marie Band of Chippewa Indians on February 18, March 5, and March 9, 2004. Messages were left for the tribal biologist.

Phone calls were placed to the Great Lakes Fish and Wildlife Indian Commission (GLIFWC) on March 9 and March 19, 2004. On March 23, GLIFWC biological services director Neil Kmiecek contacted the national lakeshore. He indicated that tribes represented by commission had no comments on the draft management plan. The commission represents the following tribes within the 1842, 1837, and 1854 treaty areas:

Bad River Band of the Lake Superior Tribe of Chippewa Indians
Red Cliff Band of Lake Superior Chippewa Indians
St. Croix Chippewa Indians of Wisconsin
Sokoagon Chippewa Community Mole Lake Band
Keweenaw Bay Indian Community
Lac Courte Oreilles Band of Lake Superior Chippewa Indians
Lac du Flambeau Band of Lake Superior Chippewa Indians
Lac Vieux Desert Band of Lake Superior Chippewa

A phone message was left for the Chippewa/Ottawa Resource Authority on March 30, 2004. A phone call was placed to Tom Gorenflo of the Chippewa/Ottawa Resource Authority on April 6, 2004. Mr. Gorenflo indicated tribes located in the lower peninsula of Michigan have no comment on the draft management plan.

In accordance with Section 7 of the Endangered Species Act, the National Park Service consulted with the U.S. Fish and Wildlife Service and Michigan Department of Natural Resources regarding species known or potentially occurring in the national lakeshore. Section 7 consultation was initiated in September 1999. The Fish and Wildlife Service responded with a species list in October 1999. The National Park Service again consulted the Fish and Wildlife Service in May 2001, requesting an update of the list, including proposed or candidate species and designated critical habitat or essential habitat that might occur at or near the lakeshore. The Fish and Wildlife Service responded to that request in June 2001.

In response to the draft General Management Plan / Environmental Impact Statement, the Fish and Wildlife Service submitted comments
on October 31, 2003, stating that additional Section 7 consultation was needed before the Fish and Wildlife Service could concur with the determination in the draft document (see the later “Comments and Responses” section). The National Park Service subsequently prepared a biological assessment for the preferred alternative in the General Management Plan, which is included in appendix D. The biological assessment was submitted to the Fish and Wildlife Service on March 16, 2004. The Fish and Wildlife Service has issued a letter of concurrence with the findings in the biological assessment. This letter of concurrence is included in appendix D.

LIST OF AGENCIES AND ORGANIZATIONS RECEIVING A COPY OF THE FINAL PLAN

Note: an * denotes those agencies or organizations that responded to the draft.

Federal Agencies
Advisory Council on Historic Preservation
Army Corps of Engineers
Bureau of Indian Affairs
Bureau of Land Management
Environmental Protection Agency, Region 5
Federal Highway Administration
International Joint Commission
National Park Service
  Washington Office
  Midwest Regional Office
  Ice Age and North Country National Scenic Trails
  Isle Royale National Park
  Sleeping Bear Dunes National Lakeshore
  Keweenaw National Historical Park
Ontario Ministry of Natural Resources
Pukaskwa National Park
US Fish & Wildlife Service
  Seney National Wildlife Refuge
  East Lansing Field Office
US Forest Service
  Hiawatha National Forest
  Grand Island National Recreation Area
US Geological Survey
USDA- Natural Resources Conservation Service
USGS- Biological Resources Division

Tribes
Bay de Noc Indian Cultural Association
Bay Mills Indian Community
Bay Mills Tribe
Bad River Tribal Council
Forest County Potawatomi Tribal Office
Grand Traverse Band of Ottawa & Chippewa
Hannahville Indian Community
Keweenaw Bay Band
Keweenaw Bay Indian Community
Lac Courte Oreilles Governing Board
Lac du Flambeau Tribal Council
Lac Vieux Desert Band of Lake Superior
Chippewa
Menominee Indian Tribe
Red Cliff Tribal Council
Saginaw Chippewa Indian Tribe
Sault Tribe of Chippewa Indians
Sokaogon Chippewa Community
Sokaogon Chippewa Tribal Office
St Croix Tribal Council
Stockbridge Munsee Tribal Council
Wisconsin Winnebago Tribal Office

US House of Representatives/Senate
The Honorable Bart Stupak, U.S. House of Representatives*
The Honorable Carl Levin, U.S. Senate
The Honorable Debbie Stabenow, U.S. Senate

Michigan House of Representatives/Senate
The Honorable Michael Prusi, Michigan Senate, district #38*
The Honorable Stephen F. Adamini, Michigan House, district 109

State Agencies
The Honorable Jennifer Granholm, Michigan Governor
Michigan Department of Environmental Quality
Michigan Department of Natural Resources
Michigan Department of State
Michigan Department of Transportation
Michigan Air National Guard
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Michigan Environmental Council
Michigan Resources Commission*
Michigan Welcome Center
Minnesota Department of Natural Resources
State Historic Preservation Office
State of Michigan

City/Township/County Agencies
Alger Chamber of Commerce
Alger Conservation District
Alger County Board of Commissioners*
Alger County Clerk
Alger County Planning Commission
Alger County Sheriff’s Dept
Alger Parks & Recreation Dept
Altran
AuTrain Township
Burt Township Planning & Zoning Commission
Burt Township Public School
Burt Township Board*
Central U.P. Planning & Development Commission
Eastern U.P. Community Assistance Tech Council
Grand Island Township
Limestone Township
Marquette Co Soil Conservation District
Mathias Township
Munising City*
Munising Township*
Munising Township Board
Onota Township
Rock River Township
Upper Great Lakes Regional Commission

Organizations
Alger County Historical Society
Alger County Kiwanis
Alger County Promotional Committee
Alger County Sportsman Club
Alger Snowmobile Association
Alger Underwater Preserve
American Legion Post 131
Audubon Council Minnesota
Audubon Society - Laughing Whitefish Chapter
Audubon Society - Northeast Wisconsin Bear Hunters Association
Capitol Area Audubon Society
Central Lake Superior Watershed Partnership
Central U.P. Sportfishing Association
Central U.P. Sportsmen Association
Champion International Corporation
Circle Michigan
Coalition for Canyon Preservation
Degraff Nature Center
Delta County Chamber of Commerce
Dickinson County Chamber of Commerce
Discovering Michigan
Ducks Unlimited
Grand Island Lodge 422, Masonic Lodge
Grand Marais Chamber of Commerce
Greater Ishpeming Chamber of Commerce
Great Lakes Cruising Club
Great Lakes Indian Fish & Wildlife Commission
Great Lakes Lighthouse Keepers Association
Great Lakes Natural Resources Center
Great Lakes Sea Kayak Club
Great Lakes Sea Kayakers
Great Lakes Shipwreck Museum
Great Lakes Sport Fishing Council
Great Lakes Sports Fishermen Inc
Headwaters Environmental Station
Izaak Walton League
Kalamazoo Nature Center
Little Traverse Conservancy
Loyal Order of the Moose
Marines of Munising
Marquette Area Chamber of Commerce
Marquette County League of Women Voters
Menominee Chamber of Commerce
Michigan Association of Conservation Districts
Michigan Association of Timbermen*
Michigan Audubon Society
Michigan Bearhunter’s Association
Michigan Bow Hunters Association
Michigan Chamber of Commerce
Michigan Loon Preservation Society
Michigan Natural Areas Council
Michigan Natural Features Inventory
Michigan Nature Association
Michigan Sharp-tailed Grouse Association
Michigan Snowmobile Association
Michigan Trailfinders Club
Michigan Trappers Association
Michigan United Conservation Clubs
Michigan Waterfowl Association
Michigan Wildlife Habitat Foundation
Moosewood Nature Group
Munising Council – Knights of Columbus

2804
Munising Lioness Club
Munising Lions Club
Munising Memorial Hospital Auxiliary
Munising Rotary Club
Munising Senior Citizens Club, Inc
Munising Visitors Bureau*
National Federation of Federal Employees
National Parks & Conservation Association
Natural Areas Association
Newberry Area Chamber of Commerce
North Country National Scenic Trail Association
North Country National Scenic Trail Hikers
Northeast Michigan Consortium
Oakland Audubon Society
Oneida Business Committee
Paradise Area Chamber of Commerce
Rails to Trails Conservancy
Ruffed Grouse Society
Sault Ste. Marie Chamber of Commerce
Schoolcraft Co Chamber of Commerce
Sierra Club
Sigurd Olson Environmental Institute
Skyline Pictured Rocks
Snell Environmental Group
Society of American Foresters
St. Ignace Area Chamber of Commerce
Superior Scenic Drive Committee
Superiorland Fish & Game Club
The Nature Conservancy
Timber Products Michigan
Travel Michigan, MEDC
Trout Unlimited - Michigan State Council
Trout Unlimited
Trust for Public Lands
U.P. Bear Houndsmen
U.P. Catholic
U.P. Whitetails Association Inc
Upper Peninsula Environmental Coalition
Upper Peninsula Highway Coalition
Upper Peninsula Travel & Recreation Assn.
Vietnam Veterans Association Chapter 237

Wetmore Community Club
White Water Associates Inc
Whitefish Point Bird Observatory
Wilderness Society
Wildlife Unlimited of Delta County

Local Businesses
BayWatch Resort
Camel Riders Resort
Curly's Hilltop Grocery
Das Gift Haus
Forest Glen Resort
ForestLand Group, Limited Liability Corporation
Hiawatha Log Homes
Mead Corporation
Melstrand General Store
Munising Pro Sports
Pictured Rocks Cruises
Robinsons Grocery
Shelter Bay Forests
Singleton Oil Co
Shipwreck Tours
Trenary Home Bakery
Wandering Wheels Campground
White Fawn Lodge

Media
Action Shopper News
Associated Press
Boat U.S. Reports
Booth Newspapers
Capitol Times
Chicago Tribune
Daily Globe
Daily Mining Gazette
Delta Reporter
Detroit Free Press
Detroit News
Escanaba Daily Press
Evening News
Grand Marais Gazette
Grand Marais Pilot
Grand Rapids Press
Green Bay Press Gazette
Iron Mountain News
Iron River Reporter
Lake Superior Magazine
Lansing State Journal
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Manistique Pioneer
Marinette Eagle-Star
Marquette Monthly
Michigan Boat & Travel
Michigan Snowmobiler
Milwaukee Journal
Milwaukee Sentinel
Mining Journal
Munising News
Newberry News
North Woods Call
Porcupine Press
WBAY-TV
WDBC-WYKK
WFRV-TV
WGLQ
WHCH-WQXO
Wheels Cycle & Sport
WHWL
WJPD-WDMJ-WIAN
WLUC-TV
WLUK-TV
WMQT
WNBY
WRUP-WFXD
WSOO News
WTIQ

Education
AuTrain Onota Public School
Bay de Noc Community College
Central Elementary School
Delta Schoolcraft ISD
Lake Superior State University
Marquette-Alger ISD
Mather Middle School
Michigan State University
Michigan Tech University
MSU Extension
Munising Baptist School
Munising High School
Munising Public Schools
Northern Michigan University
Ohio University, Athens, Ohio
Okemos Montessori/Radmoor School
Seventh Day Adventist School
Superior Central Public Schools
University of Michigan
University of Minnesota
University of Pittsburgh
University of Rochester
University of Wisconsin
University of Wisconsin - CPSU
Utah State University

Libraries
Blue Water Library
Brown County Public Library
Detroit Public Library
Gogebic Community College Library
Grand Marais Public Library
Grand Rapids Public Library
Kent County Library
Lansing Public Library
Lenawae County Public Library
Library of Michigan
Macomb Library
Mideastern Michigan Library
Munising Public Library
Muskegon County Library
Novi Public Library
Oakland County Library
Peter White Public Library
Superiorland Library Cooperative
Traverse Area District Library
Washtenaw Public Library
Wayne Public Library
This section presents elected officials, government agency, organization, and public comments received on the Draft General Management Plan and Wilderness Study / Environmental Impact Statement for Pictured Rocks National Lakeshore. The comments and agency responses allow interested parties (including the National Park Service) to review and assess how other agencies, organizations, and individuals have responded to the preferred alternative, the other alternatives, and their potential impacts.

The planning team received almost 800 separate written responses during the comment period, including letters, faxes, postcards, and e-mail comments. Of those responses, 28 were from agencies and organizations, including three federal agencies, two state agencies, four local governments, 14 environmental groups, and five other special interest groups. One state senator and one congressman provided comments. All of the other responses were from individuals and businesses. Comments were received from across the country, although most were from the Midwest, and specifically the Upper and Lower Peninsula of Michigan.

The largest group of respondents did not express a preference for any of the alternatives. Instead, 58% of the written comments focused only on wilderness. The overwhelming majority of this group (about 99%) supported wilderness designation in the national lakeshore, although they did not specify locations or size of the wilderness area. (All of the environmental groups supported wilderness designation in varying degrees.) These e-mail comments were largely identical form responses. Most of the responses were from nonlocal citizens. (Local is defined as residents of Alger County and the Upper Peninsula of Michigan.) People who supported wilderness (including those supporting alternative E and the preferred alternative) gave a variety of reasons, including: there is not much wilderness left and/or is vanishing on the Upper Peninsula, Michigan, Midwest, or the U.S.; wilderness will enable future generations to enjoy this area; wilderness will ensure that the national lakeshore’s resources are protected from development and human impacts; wilderness will ensure that visitors have an opportunity to enjoy a quiet, natural setting; wilderness will keep access as it is; and there are plenty of places people can take motor vehicles while there are very few places for hikers and kayakers who don’t want to hear the noise of motor vehicles. A number of these people also noted they would like wilderness in order to eliminate motorized vehicles like personal watercraft, and/or were opposed to paving H-58.

A much smaller group did not express a preference for an alternative but wrote in opposition to wilderness. These respondents (about 1% of the commenters who did not express a preference for an alternative but expressed a preference on wilderness) were primarily local residents and local or state organizations including the Michigan Association of Timbermen, Michigan Natural Resources Commission, and Congressman Bart Stupak. (With the exception of the environmental groups, virtually all local organizations opposed wilderness.) This group (as well as many who favored alternatives A, C and the no- action alternative) opposed wilderness for several reasons: they felt it would restrict access into the national lakeshore; prevent the elderly and disabled from enjoying areas; alienate visitors; hurt business (or at least not further economic growth); there were enough areas already
designated as wilderness; the area is already managed as wilderness so there is no need to designate it; and there is no need for a change in management.

Of those who expressed a preference for the alternatives, the largest group (38%) supported alternative E or variations of alternative E. Out of that group 36% were local (Alger County and the Upper Peninsula of Michigan) and 64% were nonlocal. Organizations that supported this alternative included most (10) of the conservation groups, including the Lake Superior Alliance, Sierra Club, Bluewater Network, PEER, and the Wilderness Society. The primary reasons commenters gave for supporting alternative E is that it proposed the largest area for wilderness, saving the center of the national lakeshore for a wilderness experience; it best protected resources; and it struck a balance between development and preservation. Some also noted it was the least costly alternative. A relatively large number of the respondents who supported alternative E proposed variations in the alternative. The most common variations were not paving H-58, allowing electric motors on the lakes in the wilderness area, and banning personal watercraft from the park. The Bluewater Network opposed the use of personal watercraft, ATVs, snowmobiles, and outboard motors in the national lakeshore, and urged that strong guidelines and policies be established before partnership agreements are created. PEER and the Wilderness Society supported adding the Grand Sable Dunes as a second wilderness unit.

The preferred alternative was also supported by a large number of commenters (24% of those who expressed a preference for an alternative). Organizations that favored this alternative or variations included the Izaak Walton League (Michigan Division), Sierra Club, The Nature Conservancy, Upper Peninsula Environmental Coalition, and two businesses. Commenters that supported the preferred alternative generally saw the alternative as a compromise, designating some wilderness without restricting access to much of the national lakeshore — the alternative was seen as protecting the area while providing for a variety of uses into the future. The preferred alternative also had suggestions for a large number of variations, including not paving H-58, permitting electric motors on boats in the wilderness, restricting personal watercraft use, and providing an education center for school groups. The Izaak Walton League favored limiting all motorized vehicle access to major points of interest or as access to national lakeshore facilities and expanding the protection of Lake Superior shoreline and internal wilderness. The Upper Peninsula Environmental Coalition recommended several changes in the alternative, including providing additional protection to the Chapel Lake area (not the casual recreation management prescription), prohibiting the beaching and anchoring of motorboats at Chapel Beach, extending the nonmotorized zone from the wilderness area west to Grand Portal Point, and not constructing a new campground north of the Miners Falls road.

Alternative C was preferred by 22% of those expressing a preference, primarily local residents and organizations including the Township and city of Munising, Alger County, State Senator Prusi⁴, and the Upper Peninsula Trapper’s Association. This group primarily supported alternative C because they wanted additional access and more development and services in the national lakeshore.

Much smaller numbers of people and organizations supported the no-action alternative (6% of those expressing a preference) and alternative A (9%). These alternatives were primarily supported by local residents. The no-action alternative was supported because this group did not see a need for any change in management. Most did

¹ The Sierra Club supported both the preferred alternative and alternative E.

⁴ Senator Prusi expressed support for either alternative C or alternative A.
not want changes in services or developments (although a few still wanted road improvements). Of those who gave reasons for supporting alternative A, the most common reason was that they were opposed to wilderness, believing it would take away or restrict access into much of the national lakeshore (although they apparently supported preserving the central portion of the lakeshore in a primitive condition). Several of the people favoring alternative A wanted H-58 paved, and a few mentioned they didn’t want to see a campground established in the Miners area.

One business, Peoples State Bank, supported a new alternative that incorporated a combination of actions in alternative C and the preferred alternative. One individual also proposed a new alternative that included such actions as keeping Beaver Basin relatively undeveloped without a wilderness designation, putting in bicycle trails, widening the trails, allowing random camping, disallowing hunting and trapping in the national lakeshore, and expanding use for mountain bike riders, horseback riders, and skiers.

Four agencies did not provide opinions on the alternatives, including the Burt Township Board and the Michigan Department of Natural Resources, but instead addressed specific concerns. Among its suggestions, the Burt Township Board believed that handicap access should be a priority at several locations; they also favored allowing electric motors and small gas motors on the Beaver Lakes and wanted to see more access for local residents, including improvements at Grand Sable Lake. The Michigan Department of Natural Resources was also opposed to banning motors on the lakes and was concerned about the impact of wilderness on its ability to monitor fish populations. It also was concerned about the impacts of improvements to H-58. The U.S. Fish and Wildlife Service expressed concerns about the lack of discussion and inaccuracies in the document regarding federally threatened and endangered species, and noted that section 7 consultations needed to be completed.

A few individual commenters didn’t express a preference for alternatives or for wilderness. Instead, they focused on specific concerns or issues. Generally, there was no common thread in these comments. A couple people, however, wrote urging that more camping facilities be provided, especially at Beaver Lake.

When one looks at the overall written comments, those supporting at least some wilderness (91% of the commenters, including those individuals and organizations supporting the preferred alternative, alternative E, or variations, or just writing in support of wilderness) far outweighed those individuals and organizations opposing wilderness (9% of the commenters, including those supporting the no-action alternative, alternative A, alternative C, or variations, or just writing in opposition to wilderness).

**SUMMARY OF WRITTEN COMMENTS**

There were 799 written comments received on the draft document. There were 765 written comments from individuals. Written comments were also received from two local, state, and federal representatives, three federal agencies, two state agencies, four local and regional governments, four businesses, and 19 organizations and special interest groups. Three hundred and ten total written comments were received expressing support for an alternative (282 individuals and 28 agencies/organizations/businesses/officials).

Of the commenters not favoring an alternative, 462 supported wilderness and six opposed wilderness. Five hundred and seventy six commenters supported wilderness irrespective of alternative while 46 opposed wilderness irrespective of alternative. One commenter suggested a new alternative. One
handwritten comment letter was indecipherable.

For the commenters supporting an alternative, the results are as follows:

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Number</th>
</tr>
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<tbody>
<tr>
<td>Preferred</td>
<td>47</td>
</tr>
<tr>
<td>Preferred with variations</td>
<td>19</td>
</tr>
<tr>
<td>No Action</td>
<td>17</td>
</tr>
<tr>
<td>No Action with variations</td>
<td>3</td>
</tr>
<tr>
<td>A</td>
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<td>A with variations</td>
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<td>C</td>
<td>56</td>
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<td>C with variations</td>
<td>4</td>
</tr>
<tr>
<td>E</td>
<td>88</td>
</tr>
<tr>
<td>E with variations</td>
<td>21</td>
</tr>
</tbody>
</table>

**RESPONSES TO COMMENTS / SUBSTANTIVE COMMENTS**

The Council on Environmental Quality (1978) guidelines for implementing the National Environmental Policy Act requires the National Park Service to respond to substantive comments. A comment is substantive if it meets any of the follow criteria (from Directors Order 12: Conservation Planning and Environmental Impact Analysis, NPS 2001):

- It questioned, with reasonable basis, the accuracy of the information.
- It questioned, with reasonable basis, the adequacy of environmental analysis.
- It presented reasonable alternatives other than those proposed in the plan.
- It would cause changes or revisions in the preferred alternative.

Many of the comments expressed an opinion but did not meet the above criteria. Others were outside the scope of the Pictured Rocks General Management Plan and Wilderness Study / Environmental Impact Statement.

Although the National Park Service values this input, no response is provided to such comments. Comments that identified errors such as misspelled words and typos were not included as substantive, but the National Park Service appreciates the information and has corrected the errors.

As required, all agency letters are reprinted. Photocopies of letters from elected officials, organizations, and individuals with substantive comments are reprinted. The National Park Service’s responses to the substantive comments are adjacent to the comment.

Written transcripts from the two wilderness hearings and copies of all the written comments are available for public review at Pictured Rocks National Lakeshore headquarters.

**CHANGES TO THE PREFERRED ALTERNATIVE IN RESPONSE TO PUBLIC COMMENTS**

In response to public comment, the National Park Service changed the management prescription for the 0.25 mile portion of the national lakeshore in Lake Superior from primitive to casual recreation. This allows for motorboat use along the entire 42- mile shoreline. Instead of prohibiting all motorized boating, electric motors would be allowed on Little Beaver and Beaver Lakes; however, gasoline- powered motorboats would still be prohibited.

A concerned member of the public noted that there was a difference between the wilderness acreage figures and percentages in the draft plan and the same figures that were presented in post- draft letters/news releases. Before the draft was printed, it was noted that the eastern wilderness boundary as shown on the Wilderness Study map was difficult to identify from the ground. The eastern wilderness boundary was moved west slightly to the...
mouth of Sevenmile Creek to make it more easily identifiable. This should have resulted in a change of wilderness acreages and percentages in the draft in those alternatives —

- in the preferred from 12,843 acres and about 18% of the national lakeshore proposed for wilderness designation to 11,739 acres and about 16%, and
- in alternative E from 18,063 acres and 25% of the national lakeshore proposed for wilderness designation to 16,959 acres and 23%.

Those changes have been made in this final plan.

SUBSTANTIVE COMMENT LETTERS AND NPS RESPONSES

Following are reprinted letters and responses to substantive comments.

It should be noted that when referring to motorized boating use and access, personal watercraft (PWC) use is a separate issue. Regulations for PWC use are currently in the Federal rulemaking process. Under the proposed regulations, PWC use would be restricted to designated launch sites (currently Sand Point) and on Lake Superior within the national lakeshore boundary from the western boundary up to the east end of Miners Beach. Personal watercraft users would be allowed to beach their craft on Miners Beach. Personal watercraft would not be allowed to launch or operate elsewhere in the national lakeshore.
Bart Stupak

1. The preferred alternative was created in response to public comments on the draft alternatives. The wilderness boundary was drawn around the access road to Beaver Lakes and Little Beaver campground to continue to provide vehicular access to this popular area. In response to public comment on the draft plan, the National Park Service will allow electric motors on Little Beaver and Beaver Lakes and will change the management prescription on the 0.25 mile wide portion of Lake Superior adjacent to proposed wilderness, from primitive to casual recreation, which will allow motorized use from Spray Falls to Sevenmile Creek. The intent of the preferred alternative was to provide additional recreational and access opportunities on the east and west ends of the national lakeshore. Specifically, construction of a new drive-in campground in the Miners area, upgrades to the trails in the Chapel area, improved access to east-end attractions, addition of a boat-in campsite on Grand Sable Lake, new day use area at Coast Guard Point (pending land acquisition), and conversion to public use the Sand Point Coast Guard Station and Munising Range Light Station once a new administration facility is built.

2. Chapel Basin was not included in the proposed wilderness in the preferred alternative.

3. As mentioned above, the change in management prescriptions from primitive to casual on Lake Superior allows for motorboat use and fishing access.
COMMENTS

The GMP must include the perspective of all park users -- picnickers, hikers, boaters, campers, canoeists, anglers, hunters, cross-country skiers, and snow mobilers.

Additionally, I urge the lakeshore management to work with the county in partnership with the Michigan Department of Transportation (MDOT) to quickly move the Alger County Highway 58 project to completion. The federal government has done its part in contributing $5 million to this project and it is now time for the state to finally see this to fruition. Until its completion, the cost to rebuild H-58 will continue to increase as funding continues to be drawn out.

Ultimately, it is the local governmental units that are most directly impacted by the day to day operation of the park and whose comments, I hope the NPS would closely review as to the direction and future of PRNL. Working together, the revised GMP can benefit the park, its visitors and the local communities.

Sincerely,

BART STUPAK
Member of Congress

BTS/af
Response to Michael Prusi letter

1. Please see response 1 to Congressman Stupak.

2. Please see response 1 to Congressman Stupak.

3. Only a two-stall garage remains from the Michigan Wisconsin Pipeline Camp in Beaver Basin. Further research (since the draft plan was released) indicates that it is ineligible for listing on the National Register of Historic Places. We added this finding to the final plan in the “Wilderness Study” section.
Ms. Karen Gustin
Pictured Rocks National Lakeshore
P.O. Box 40
N5391 Sand Point Road
Munising, MI 49862-0040


Dear Ms. Gustin:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the National Park Service's (NPS) Draft Environmental Impact Statement (DEIS) for the Pictured Rocks National Lakeshore General Management Plan, Alger County, Michigan. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The CEQ's number for this DEIS is 030391.

The last comprehensive planning effort (general management plan) for Pictured Rocks National Lakeshore was completed in 1981. Much has occurred since 1981. Patterns and types of visitor use have changed, boundaries have been amended and changed, and the development of a scenic drive has been prohibited by recent legislation. Each of these changes has major implications for how visitors will access and use the National Lakeshore in the future.

General management concerns were identified by the NPS through its planning and scoping processes. The concerns were the extent to which visitor services and facilities, or administrative and support services can be provided without impacting natural and cultural resources.

The No Action Alternative describes a continuation of the existing management practices at Pictured Rocks National Lakeshore, and provides a baseline for evaluating the changes and impacts of the other alternatives.

In Alternative A, the management of the National Lakeshore would be very similar to existing management practices with a few exceptions. Administration and maintenance functions would be consolidated in new facilities near Munising and Grand Marais. A new campground would be provided in the Miners area, and pavement County Road H-58 would be recommended. Alternative B was dropped from consideration.
Alternative C would provide an easier and more convenient way to visit the National Lakeshore. Vehicular access and/or improved pedestrian access would be provided to additional lakeshore areas, features and significant cultural resources. Many roads would be paved and improved to increase areas of access to visitors.

Alternative E would propose much of the middle third of the National Lakeshore for designated wilderness. To accommodate possible increased use in the non-wilderness portions of the National Lakeshore, certain roads would be upgraded, and a new campground would be added. Operational facilities would be consolidated near Munising and Grand Marais.

Alternative D. The NPS's Preferred Alternative, would provide additional and more convenient access to significant National Lakeshore features, thus expanding opportunities for visitor use and enjoyment. Efforts would continue to restore the National Lakeshore to as natural a state as possible. Natural ecological processes would be allowed to occur, and restoration programs would be initiated where necessary. Federal lands in the Beaver Basin area would be proposed for designation as wilderness. About 15% of the National Lakeshore acreage would be proposed for designation as wilderness.

Having reviewed the DEIS, U.S. EPA rates Alternative D, the NPS's preferred alternative, as LO - Lack of Objections. Although Alternative E also provides for substantial wilderness designation and preservation, the Preferred Alternative would provide more economic benefit to Alger County. The LO rating indicates that we do not have concerns about the project impacts or amount of information the NPS has supplied in support of the management plan.

We appreciate the opportunity to review the DEIS. Please send only two copies of the final EIS to this office at the same time it is officially filed with our Washington, D.C. Office. If you have any questions, please call Joana Bezerra at (312) 885-6004, or send email to bezerra.joana@epa.gov.

Sincerely,

Kenneth A. Westerling
Chief, Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

Enclosures (1): Summary of Rating Definitions
SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impacts of the Action

1- Lack of Objectives
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that would be accomplished with no more than minor changes to the proposal.

EC-Environmental Concern
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

SO-Environmental Objections
The EPA review has identified adverse environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

DU-Environmentally Unacceptable
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unacceptable from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unacceptable impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1- Adequate
The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2- Insufficient Information
The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA review has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3- Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA review has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have been given public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

Response to U.S. Fish and Wildlife Service

1. The National Park Service initiated Section 7 consultation in September 1999. The Fish and Wildlife Service responded with a species list in an October 1999 letter. Given the length of time since the 1999 request, the National Park Service again consulted the Fish and Wildlife Service in a May 2001 letter requesting an update of the list, including proposed or candidate species and designated critical habitat or essential habitat that might occur at or near this locality. A response was received from Fish and Wildlife in June 2001 listing only the bald eagle (Haliaeetus leucocephalus) and Pitchers thistle (Cirsiumpitcheri) as threatened and that there was proposed piping plover critical habitat.

2. Please see response number 1. We added piping plover (Charadrius melodus) to table 6, List of Species of Concern at Pictured Rocks National Lakeshore. We have critical habitat on the beach of Lake Superior at Grand Marais, but the species has not been detected at the national lakeshore in more than 10 years.
3. Please refer to Appendix G: Biological Assessment for Threatened and Endangered Species. The National Park Service has stated what it proposes to do, listed species and critical habitat that potentially are known to occur in the action area, and analyzed impacts and cumulative impacts.

4. Please refer to comment 3 above.

5. Please refer to comment 3 above.

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### COMMENTS

3. As endangered species and critical habitat are found within the proposed action area, a determination of how the proposed project would affect listed resources (federally threatened and endangered species and designated critical habitat) is required. There are three conclusions that could be reached as a result of the determination: no effect, not likely to adversely affect and likely to adversely affect. A "no effect" determination means your assessment revealed that the proposed action would have no effect whatsoever on listed resources. A "not likely to adversely affect" determination is reached if the proposed action would have any beneficial, insignificant, or de minimus effects, and a "likely to adversely affect" determination should result if any direct or indirect adverse effects can be identified that are not insignificant or de minimus.

If your effects determination concludes that the project will have no effect on listed resources, you should document this in your file. A concurrence letter from our office is not needed. If your effects determination concludes that listed resources may be affected (positively or negatively) by the proposed action, you should initiate section 7 consultation with our office. If the effects determination concludes that listed resources are not likely to be adversely affected as a result of the proposed action, you must obtain concurrence from us through informal consultation. If, however, you determine that listed resources are likely to be adversely affected as a result of the proposed action, you should initiate formal consultation with our office.

Within the DEIS (p.175) a discussion regarding likely impacts of the preferred alternative on species of concern is incorporated (similar discussions are provided for each alternative and, although the preferred alternative on bald eagle, gray wolf, and Pitcher's thistle, are briefly discussed, effects determinations for piping plover and piping plover critical habitat were not incorporated). When you request section 7 consultation with this office, we suggest that an effects determination is incorporated for piping plover and piping plover critical habitat, and that every determination should incorporate all potential direct, indirect, and cumulative effects.

Information provided in the enclosed document titled "Guidance for Preparing Biological Assessments and Biological Evaluations" may help in developing your effects determination.

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### RESPONSES

3. Please refer to Appendix G: Biological Assessment for Threatened and Endangered Species. The National Park Service has stated what it proposes to do, listed species and critical habitat that potentially are known to occur in the action area, and analyzed impacts and cumulative impacts.

4. Please refer to comment 3 above.

5. Please refer to comment 3 above.

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### Table: Effects Determination

<table>
<thead>
<tr>
<th>Species</th>
<th>Determination</th>
<th>Reasoning</th>
<th>FWS Involvement</th>
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<td>Beneficial effects</td>
<td>Letter of concurrence</td>
</tr>
<tr>
<td>Pitcher's Thistle</td>
<td>Not likely to adversely affect</td>
<td>Beneficial effects</td>
<td>Letter of concurrence</td>
</tr>
<tr>
<td>Gray Wolf</td>
<td>Not likely to adversely affect</td>
<td>Insignificant or de minimus effects</td>
<td>Letter of concurrence</td>
</tr>
<tr>
<td>Piping Plover</td>
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</tr>
<tr>
<td>Piping Plover Critical Habitat</td>
<td>No Determination</td>
<td>NA</td>
<td>Unknown at this time</td>
</tr>
</tbody>
</table>
Endangered Species and General Natural Resource Management

We suggest that PIRC's responsibilities for listed species and critical habitat under section 7 of the Endangered Species Act (ESA) be addressed in the DEIS. Section 7(a)(1) of the Act imposes an affirmative duty to conserve listed species on Federal agencies. Section 7(a)(1) directs all Federal agencies to proactively conserve listed species by carrying out programs aimed at their recovery. Although not articulated in the DEIS, we are aware that PIRC staff is working proactively to protect and recover federally listed endangered species. These activities and planned future activities, should be incorporated into the DEIS. If this information is currently found in another publicly reviewed document then that document should be incorporated into the DEIS by reference.

A discussion regarding natural resource management also appears to be lacking from the DEIS. It seems appropriate that this information be incorporated into the DEIS since the General Management Plan provides a framework for making decisions about and managing PIRC's resources over the next 15 years. This proposed natural resource management section should include information on how PIRC will manage aquatic and terrestrial resources. This section could also include endangered species management as discussed above. Again, if a publicly reviewed document exists on natural resource management already exists then this document should be incorporated into the DEIS by reference.

6. Please refer to comment 3 above.

7. Appendix B contains all servicewide mandates and polices for the management of natural resources. Most of these come directly from NPS Management Policies 2001. The lakeshore also operates under a National Park Service-approved "Resource Management Plan" for natural and cultural resources, which is available upon request from Pictured Rocks National Lakeshore.

8. Table 6: List of Species of Concern at Pictured Rocks National Lakeshore has been amended as follows:

**Changes:**

- Gray wolf is state threatened
- Peregrine falcon has been delisted at the federal level, no federal designation
- Bald eagle is state threatened

**Additions:**

- *Accipiter gentilis* Northern goshawk state species of concern
- *Buteo lineatus* Red-shouldered hawk state threatened
- *Dendroica cerulea* Cerulean warbler state species of concern
- *Gavia immer* Common loon state threatened
- *Potamogeton confervoides* Alga pondweed state species of concern
- *Charadrius melodus* Piping plover federal/state endangered

Co: Lyn McLean, Twin Cities, MN (ES)
**Endangered Species Updates for PIRO DEIS**
Draft General Management Plan & Wilderness Study
2003

Please update Table 6 (pg. 128) and text on pg. 129 to reflect the following information:

**Gray Wolf**
In March 2003, the gray wolf was reclassified as a threatened species under the Endangered Species Act (Act).

In winter 2003, 321 wolves were estimated to live in the Upper Peninsula.

Your use of critical habitat when describing wolf habitat within Pictured Rocks National Lakeshore (PIRO) could be misinterpreted. Critical habitat is a specific designation under the Act. Isle Royale National Park is the only area in Michigan which is designated critical habitat for gray wolves. We suggest not using the word critical when describing gray wolf habitat. Perhaps rework the sentence to read: "According to the Michigan Department of Natural Resources (MDNR 2000), the national lakeshore does not contain significant habitat for gray wolves as the lakeshore lacks a year-round food source."

**Peregrine falcon**
The peregrine falcon (*Falco peregrinus*) was removed from the federal list of threatened and endangered species in 2000. Due to delisting, the peregrine falcon no longer receives protection under the Act.

**Great Lakes Piping Plover**
Piping plover was discussed in the text on page 129, however, it was not included in your species of concern list presented in Table 6. The Great Lakes Piping plover is listed as an endangered species under the Act.

Critical habitat for piping plovers was designated in 2001. A segment of piping plover critical habitat in Grand Marais is owned by PIRO. This property is just north of the Grand Marais ranger station. Piping plovers nested on this property in 1992.

**Pitcher’s Thistle**
The Recovery Plan for Pitcher’s thistle was completed in 2002. The Pitcher’s thistle population that occurs at Grand Sable Dunes is ranked as an “A” under NatureServe Element Global Ranking Criteria. An “A” rank suggests a dune size over 250 acres and a population of at least 5,000 individuals.
We added the North Country National Scenic Trail to the “Purpose and Need” section.
### COMMENTS

1. Congressionally authorized area administered by the NPS, it would seem appropriate to mention it in "The Region" section along with other NPS- and Federally-administered areas.

2. Pages 14 and 17-19—The NTS Act is appropriately referenced on page 14. It might also be appropriate to include in the table on pages 17-19 the fact that the NTS Act requires that motorized use of the North Country NST is prohibited, and that the policy of the NPS is that the trail be managed primarily for hiking and backpacking in accordance with the following Statement of Purpose and Desired Future Condition adopted by the NPS and USDA-Forest Service on November 6, 1998.

### RESPONSES

2. We added your suggestion at the end of the table.

### NORTH COUNTRY NATIONAL SCENIC TRAIL

**Statement of Purpose / Desired Future Condition**

The North Country Trail, conceived of in the 1960s, was established as a National Scenic Trail in 1980 under the National Trails System Act (16 U.S.C. 1241 et seq.). According to the Act, the North Country Trail is:

- To be a trail of approximately thirty-two hundred miles, extending from eastern New York State to the vicinity of Lake Sakakawea in North Dakota, following the approximate route depicted on the map identified as “Proposed North Country Trail—Viscinity Map” in the Department of the Interior “North Country Trail Report,” dated June 1975;

- To be so located as to provide for its maximum outdoor recreation potential;

- To be so located as to provide for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which it passes;

- To be administered by the Secretary of the Interior and operated, developed, and maintained in conjunction with other Federal Agencies, States, their political subdivisions, adjacent landowners, and private organizations and individuals; and

- To be administered in a manner that encourages and assists volunteer citizen involvement in the planning, development, maintenance, and management of the trail.

The Trail will be administered and managed as a path whose use is primarily for hiking and backpacking. Management of the North Country National Scenic Trail is also affected by other Federal legislation, including, but not limited to, the 1916 Organic Act, the National Forest Management Act, the Wilderness Act, the National Environmental Policy Act, the National Historic Preservation Act, the Wild and Scenic Rivers Act, and the Endangered Species Act. Numerous regulations, policies, plans, and cooperative agreements have been established to
3. Under the casual recreation and primitive prescriptions we added "Bicycle use would not be permitted on trails within the shoreline zone." The National Park Service cannot dictate appropriate trail use on private property in the inland buffer zone. Under the mixed use prescriptions we added "Bicycle and motorized use on the North Country National Scenic Trail would be prohibited."

4. We added at the end of each alternative concept (no action, preferred, A, C, and E) the following sentence: "Continue to preserve the North Country National Scenic Trail's character and use as a premier hiking and backpacking trail."

5. We added "accessed by the North Country National Scenic Trail" to the first sentence.

6. We added "The North Country National Scenic Trail is one of only eight National Scenic Trails in the nation, and when completed it will be the longest hiking trail in the nation (4,200 miles)."

7. We added "Ice Age and North Country National Scenic Trails" to the list.

We understand and appreciate the enormous amount of work that has gone into the planning process and bringing it to this point of a draft plan. We also appreciate the opportunity to provide these comments and your consideration of them in the finalization of the plan and EIS. Please contact us if you have any questions about our comments.

/s/ Thomas L. Gilbert

Tom Gilbert
COMMENTS

JENNIFER M. GRIANHOLM
GOVERNOR

DEPARTMENT OF NATURAL RESOURCES

LANING

November 17, 2003

Ms. Karen C. Gustin, Superintendent
Pictured Rocks National Lakeshore
P.O. Box 40
Munising, MI 49862-0040

Dear Ms. Gustin:

Thank you for the opportunity to comment on the draft revision of the Pictured Rocks National Lakeshore general management plan. We are pleased to offer the following comments on the designated preferred alternative.

We recognize the need for a diversity of recreational opportunities, including wilderness experiences, however, we also must consider the impacts to recreational opportunities. We believe that the preferred alternative, which proposes wilderness designation for Beaver Basin, will significantly decrease recreational opportunities for fishing by prohibiting the use of motorized boats on the Beaver Lakes. It is our understanding that wilderness designation does not preclude the use of electric motors on fishing boats. Restricting lake use to electric motors or human powered vessels may be a suitable compromise to address recreational use.

In addition, our Fisheries Division has expressed concern that wilderness designation will impact its ability to monitor fish populations on the Beaver Lakes and Seven Mile Creek, using current survey protocols. Seven Mile Creek has been an area of emphasis for restoration of coaster brook trout. Evaluation of restoration efforts is critical for improving success of future restoration efforts. We understand that you may be willing to develop a Memorandum of Understanding that would permit the continued use of our standard survey methods. From our review of the wilderness designation, it does not appear that such exemptions are allowed. Thus, we are not willing to support wilderness designation until this issue can be resolved in a manner that is allowed within this designation.

We are also concerned about further improvements to County Road H-58. Improvements of this road will likely increase off-road vehicle and other human activities in the Kingston Plains area, an ecosystem that is sensitive to overuse. Improvement of the road may also lead to increased development which will negatively impact wildlife resources of the area. We would agree that any improvements to H-58 should maintain a low-speed road that preserves the forest canopy, rustic character, scenic qualities, and archeological resources wherever possible.

RESPONSES

Department of Natural Resources

1. In response to public comment, the preferred alternative was changed to allow electric motors on Little Beaver and Beaver Lakes.

A query on the Michigan Department of Natural Resources website produced these results:

Within 25 miles of the city of Munising there are 32 public access sites, not including NPS Beaver and Sable Lake access sites (7 type 1 ramps, 6 type 2 ramps, 13 type 3 ramps, and 6 type 4 launch sites). Beaver Lake represents 3.6% of all water bodies with drive-in public access. All of these are water bodies allowing motorized use.

Within 50 miles of the city of Munising there are 112 public access sites, not including NPS Beaver and Sable Lake access sites (30 type 1 ramps, 16 type 2 ramps, 20 type 3 ramps, and 26 type 4 launch sites). This includes access sites on major rivers. All of these allow motorized use except for sections of the Fox River in Schoolcraft County. Beaver Lake represents 1.1% of water bodies with drive-in public access.

The numbers include boat ramps for Lake Superior.

Ramp Categories:

Type 1: Hard surface ramp — drive-in access
Type 2: Hard surface ramp on limited size water body — drive-in access
Type 3: Gravel surface ramp — drive-in access
Type 4: Carry down launch site — drive-in but no boat ramp

2. Scientific research can occur in wilderness. Per NPS Management Policies 2001, 6.3.6.1, “Scientific activities are to be encouraged in wilderness. Even those scientific activities (including inventory and monitoring and research) that involve a potential impact to wilderness resources or values (including access, ground disturbance, use of equipment, and animal welfare) should be allowed when the benefits of what can be learned outweigh the impacts on wilderness resources or values. However, all such activities must also be evaluated using the minimum requirement concept and include documented compliance that assesses impacts against benefits to wilderness.”

Natural Resource Commission
No substantive comments.
Ms. Karen C. Gustin

November 17, 2003

Visitors to this area comment on the natural resource and cultural/historical values of the area. The Lakeshore is uniquely situated to educate residents and visitors on the importance and context of landscape-level planning and processes, incorporating concepts like the buffer zone and mutually compatible uses. We commend efforts to ensure all factors are considered, and ask that concerns about consequences of wilderness designation be addressed before a final decision is made.

Again, thank you for the opportunity to participate in the planning process.

Sincerely,

George E. Burgoyne, Jr.
Resource Management Deputy
517-373-0046

cc: Ms. Rebecca A. Humphries, DNR
    Dr. Kelley Smith, DNR
Ms. Karen Gustin
National Park Service
P.O. Box 40
Munising, MI 49862

Dear Ms. Gustin:

During the September 12, 2003 meeting of the Michigan Natural Resources (NRC), the following resolution was unanimously adopted by the NRC:

**Pictured Rocks National Lakeshore**

Commissioner Madigan made a motion, supported by Commissioner Campbell, opposing the National Park Service proposal to designate Beaver and Little Beaver Lakes as "wilderness areas," and the NRC recommends that any regulations changes should not be made without DNR Fisheries Division agreement. Motion unanimously carried.

Please feel free to contact me if you have questions or wish to discuss this issue further.

Sincerely,

John Madigan, Commissioner
Natural Resources Commission
906-632-3337
Local Governments

Alger County Resolution

1. Please see response 1 to Congressman Stupak.

2. Please see response 1 to Michigan Department of Natural Resources.

3. Please see response 3 to State Senator Michael Prusi.

4. We do not agree that additional hikers and backpackers would have a negative impact on Alger County’s tourist-based economy. In summer 2001, the University of Idaho conducted a Visitor Services Project at Pictured Rocks and found that national lakeshore visitors spent $14.8 million in the local area (within 60 miles of the national lakeshore) and generated $4.6 million in direct personal income (wages and salaries) for local residents.
At last night’s special meeting of the Burt Township Board, we discussed the General Management draft for PRNL. Some of us had attended meetings during which you and others explained the alternatives and answered questions. Although we have been trying for some time to come to an agreement on which alternative we could support, we were unable to come to a majority decision let alone a consensus. We do not support “no action” either.

I was assigned to write to you informing you of our non-decision, but to comment on a few ideas that did have majority or unanimous support. We agreed that handicap access should be a priority at several locations; possibly scheduled trips to these locations using a small bus or other suitable vehicle. We do not want to see the Beaver Lakes prohibit the use of all motors, we believe electric trolling motors and small gas motors should be allowed. We also agreed that more planned events for the slow times. (April, May, early June, late September, October and November), would benefit our businesses. We believe that from late June through early September, our facilities are saturated and any additional traffic may create problems.

Our main sticking points were the paving of H-58 and restriction of use by the public, especially the year round residents. In fact most of us would like to see more access for locals including improvements at Sable Lake. If Burt Township can be of further assistance, please let us know.

Sincerely,

JT Seibert

Burt Township Board
1. Handicap access is provided to the Chapel area on a reservation fee basis through AITran, the local transportation service.

2. In response to public comment, the preferred alternative was changed to allow electric motors on Little Beaver and Beaver Lakes. Due to the noise and potential for pollution, gasoline motors will be prohibited.

3. Planned events are a park programming decision and are not a general management plan decision.
City of Munising Resolution

1. The Wilderness Study concluded that the Beaver Basin met the criteria for proposed wilderness. NPS Director's Order 41 “Wilderness Preservation and Management” in section 6.2 states “Lands that have been logged, farmed, grazed, mined, or otherwise utilized in ways not involving extensive development or alteration of the landscape may also be considered suitable for wilderness designation if, at the time of assessment, the effects of these activities are substantially unnoticeable or their wilderness character could be maintained or restored through appropriate management actions.”

2. Please see response 1 to Michigan Department of Natural Resources.

3. Please see response 3 to State Senator Michael Prusi.

4. In response to public comment on the draft, the management prescription on the 8.5-mile stretch of Lake Superior from Spray Falls to Sevenmile Creek was changed from primitive to casual recreation, which allows for motorized boat use.

5. Please see response 4 to the Alger County resolution.

Rod DesJardins, Mayor
8/19/02
Township of Munising Resolution
1. Please see response 1 to Congressman Bart Stupak.
October 28, 2003

Karen Gustin
Pictured Rocks National Lakeshore
P.O. Box 40
N8391 Sand Point Road
Munising, MI  49862-0040

Re: Pictured Rocks National Lakeshore Draft General Management Plan and Wilderness Study Environmental Impact Statement

Dear Ms. Gustin:

On behalf of the members and supporters of Bluewater Network, please accept the following comments on the General Management Plan for Pictured Rocks National Lakeshore. Bluewater Network is a national organization that strives to champion innovative solutions and inspire individuals to protect the earth’s finite and vulnerable ecosystems.

We commend the Park Service for producing the GMP for Pictured Rocks and for proposing to preserve areas of the lakeshore as wilderness for current and future visitors. Wilderness areas provide visitors an opportunity to experience the lakeshore in a setting that eliminates the noise and pollution of motorized craft. Our concerns regard the continued use of high-polluting, noisy, and wildlife-disturbing personal watercraft, snowmobiles, and two-stroke outboard engines within the boundaries of the lakeshore.

Proposed wilderness
The Wilderness Act of 1964 defines wilderness as “an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain.” As such, designated wilderness areas do not allow the use of motorized craft such as personal watercraft, snowmobiles, and motor boats. The intention of the wilderness act was to provide citizens with areas of refuge and sanctuary from everyday life with “outstanding opportunities for solitude or a primitive and unconfined type of recreation.” A side effect of this policy is that wilderness areas are not subject to the pollutants, noise and harmful impacts to wildlife that motorized thrillcraft pose. Wilderness designation provides significant long-term benefits for an area, especially considering how far and few between wilderness experiences are for Americans today. Bluewater Network therefore supports the wilderness proposal outlined in alternative E, which proposes to designate 18,063 acres (approximately 25 percent) of the lakeshore as wilderness.

Noise
It is appropriate that the Park Service pursue wilderness designation for a portion of Pictured Rocks since, as the GMP states, “public comments received on the preliminary draft alternatives indicate that many visitors are seeking a quiet, nature-based experience when visiting the national lakeshore and man-made noise that carries over long distances.
Organizations

Bluewater Network opposes the use of personal watercraft, snowmobiles, and two-stroke outboard motors in national park areas. We recommend that if Pictured Rocks is going to permit these activities within the boundaries of the lakeshore, that only the quietest machines be used. Two-stroke engines on personal watercraft, snowmobiles, and outboard motors are significantly louder than four-stroke models currently on the market. While the Park Service clearly does not have jurisdiction over adjacent lands and waterways (the Park Service can do next to nothing to affect the sounds of chainsaws on adjacent lands or the noise from personal watercraft on Lake Superior), the agency has an obligation under the Organic Act, and if proposed, the Wilderness Act, to ameliorate the ability of visitors to enjoy the natural soundscape of the lakeshore. The Park Service has demonstrated an ability to address these noise sources by outlining mitigation measures to reduce the sound of the public address system on tour boats operating on Lake Superior. Mitigation measures should also be put in place for noisy machines that are permitted to operate in the park. The most effective way for the Park Service to do this would be to allow only four-stroke powered snowmobiles, personal watercraft and outboard motors in the lakeshore boundaries.

The draft EIS makes no mention of all-terrain vehicle (ATV) use at the lakeshore. Bluewater Network opposes the use of ATVs in national park units, but if ATV use is permitted in the lakeshore, they should be restricted to high standard gravel and paved surfaces. ATVs can have severe environmental impacts on backcountry areas and beaches and these sensitive areas should be protected from their use.

To the extent possible, we also encourage the Park Service to employ the National Park Air Tour Management Act of 2000 to mitigate or eliminate new and existing air tours occurring directly over the lakeshore, as outlined in the draft EIS.

Impacts to air and water resources

The two-stroke engines found on most personal watercraft, snowmobiles and outboard motors also have detrimental impacts to air and water resources in the lakeshore. By design, two-stroke engines dump between 25 and 30 percent of their fuel (a gas and oil mixture) unburned into the environment. This pollution has been shown to cause significant damage to air and water quality. The National Academy of Sciences (NAS) recently reported in Oil in the Sea III: Inputs, Fates, and Effects, that two-stroke engine pollution has a major impact on water and biological resources. In particular, the research reported that even minor, short-term spills like the kind generated by two-stroke engines can cause detrimental damage to the energetic and biosynthetic processes and immune systems of aquatic wildlife, as well as their structural development and reproduction.
The National Park Service would continue to support the development and use of best available technology for both snowmobiles and personal watercraft. Use of snowmobiles and personal watercraft would continue to be restricted at the national lakeshore. Snowmobiles are restricted to roads traveled by vehicles in the summer. The National Park Service is unable to enforce a ban of snowmobiles on county-owned roads. Personal watercraft use is restricted to designated launch sites (currently Sand Point) and on Lake Superior within the national lakeshore boundary from the western boundary up to the east end of Miners Beach. Personal watercraft users would be allowed to beach their craft on Miners Beach. Personal watercraft would not be allowed to launch or operate elsewhere in the national lakeshore.

Please see response 2.

These activities do not currently occur at Pictured Rocks National Lakeshore. The casual recreation management prescription for the Lake Superior portion of the national lakeshore describes resource condition and character, visitor experience, and appropriate activities or facilities that could occur in that area. As new uses occur at the national lakeshore, staff would evaluate their impact against the management prescription and determine whether that use is consistent with the intent of the management prescription.
Global warming is beyond the scope of this general management plan.

Pictured Rocks National Lakeshore does not have an advisory committee.

Increasingly, partnerships are becoming an effective means for the National Park Service to fulfill its mission and foster a shared sense of stewardship that is so crucial for the future. Partnerships are not mentioned specifically in NPS Management Policies 2001 or in a Director’s Order, but guidance on partnerships can be found on the National Park Service website www.nps.gov/partnerships. This serves as guidance for parks until more formal guidance can be prepared.

The Park Service should encourage further study of global warming impacts and incorporate a plan for mitigation measures from such impacts in the Pictured Rocks GMP.

Public/private partnerships
While Bluewater Network encourages the Park Service to reach out to all interested parties regarding park management, we are deeply concerned about the establishment of formal partnerships. All too often, partnership agreements lead to misunderstandings at best and, at worst, an attempt by these outside interests to circumvent or prevent necessary management actions. Formal partnership agreements lead special interest groups to develop expectations that their desires will be fully accommodated. When they are not, the partnered group can paint the Park Service as “non-cooperative” or lead the press and public to believe that the so-called partnership was a token political arrangement. The Park Service’s trouble with so-called “cooperating agencies” in the Yellowstone/Grand Teton Winter Use Management Plan process is a prime example of the many problems that surround partnership agreements.

Bluewater Network is also concerned with the disturbing trend by federal agencies to relinquish more control over resource management decisions to so-called partner local citizen advisory committees. While Bluewater Network supports full citizen involvement in national park management, the creation of an advisory committee and the potential recommendations of such do not release the Park Service from its statutory and administrative mandates to protect and preserve park resources and wildlife. Judicial reviews of “local control” committees at units such as Niobrara National Scenic River have rendered similar opinions.

At a minimum, before the Park Service at Pictured Rocks enters into partnership with any outside interest, we recommend that the preferred alternative of the final GMP include

5. Global warming is beyond the scope of this general management plan.
6. Pictured Rocks National Lakeshore does not have an advisory committee.
7. Increasingly, partnerships are becoming an effective means for the National Park Service to fulfill its mission and foster a shared sense of stewardship that is so crucial for the future. Partnerships are not mentioned specifically in NPS Management Policies 2001 or in a Director’s Order, but guidance on partnerships can be found on the National Park Service website www.nps.gov/partnerships. This serves as guidance for parks until more formal guidance can be prepared.

6. The creation of an advisory committee and the potential recommendations of such do not release the Park Service from its statutory and administrative mandates to protect and preserve park resources and wildlife. Judicial reviews of “local control” committees at units such as Niobrara National Scenic River have rendered similar opinions.

7. At a minimum, before the Park Service at Pictured Rocks enters into partnership with any outside interest, we recommend that the preferred alternative of the final GMP include
the agency alone has final say on all management decisions regarding park resources and wildlife. The agency should make it expressly clear that “partnership” agreements do not release the agency from its legal mandates (in particular the Organic Act requirement) to leave park resources unimpaired. Next, the Park Service should make clear that any partnership agreement will confer no right of control or decision making power over the management of park resources and wildlife, nor any control or decision making power over the development of park structures or facilities. The Park Service should also spell out that partnership agreements confer no right to advertise inside park boundaries. Finally, all partnership agreements should be made available for public review.

Thank you for the opportunity to comment.

Sincerely,

Carl Schneebeck
Public Lands Campaign Associate
PEER—Public Employees for Environmental Responsibility

1. The Grand Sable Dunes, a designated research natural area (RNA), are among the best examples of perched dune systems in the world (Dorr, J.A. and D. F. Eschman, 1972, Geology of Michigan. University of Michigan Press.) The Grand Sable Dunes were not determined to be suitable for wilderness due to their proximity to Alger County Road H-58 and the protection already afforded it from the RNA designation. Research natural areas contain prime examples of natural resources and processes, including significant genetic resources that have value for long-term observational studies or as control areas for manipulative research taking place outside the park. Activities in research natural areas are restricted to nonmanipulative research, education, and other activities that will not detract from an area’s research values. (NPS Management Policies 2001, 4.3.1).

Federal land management agencies, including the National Park Service, have established a national network of research natural areas. The RNA designation affords more ecological protection than the wilderness designation. The highly protective pristine management prescription was applied to the Grand Sable Dunes in every alternative.

2. The National Park Service applied the same primitive management prescription to most of the Chapel Basin (except for the casual recreation prescription surrounding the trails to Chapel Lake and Chapel Beach) as it did for the Beaver Basin. It was not included in the wilderness proposal because it receives the most amount of day use hiking in the national lakeshore. Excluding the heavily used portion from wilderness (as was done for the Little Beaver Lake road and campground) would have left a fragmented narrow unit both east and west of the basin. The logging road referenced in sections 31 and 32 was not a factor in the decision. The road has been closed.
3. The preferred alternative, which includes proposed wilderness in the Beaver Basin, was developed in response to many public comments. A primary concern of half our public was continued vehicular (and boat trailer) access to the popular small Beaver Lake campground and launch ramp. Drawing the wilderness boundary around the access road, campground, and launch ramp responds to these concerns and still leaves a viable wilderness area in the Beaver Basin.

4. Please see response 1.
COMMENTs

4.
road that is suitable for public travel by means of four-wheeled, motorized vehicles intended primarily for highway use. 43 CFR 19.2.

The Grand Sable Dunes area meets every one of these criteria and the NPS is flatly wrong to assert that because the Dunes are only 2,084 acres in size the area is automatically unsuitable as wilderness.

B. Proximity of Road
The NPS further disqualified the Grand Sable Dunes because of the proximity of Alger County Road H-58. This decision is improper.

The wilderness suitability assessment is aimed at determining the wilderness character of roadless undeveloped park areas. The term "wilderness character" applies only to the immediate land involved, not to influences upon it from outside areas. Visual, audible or other human influences from outside an undeveloped roadless area do not disqualify that area, or any part of it, from wilderness suitability.

The suitability of each possible acre of roadless area is to be determined on the basis of the area itself. Sights and sounds from outside the area do not render an undeveloped roadless area unsuitable for wilderness. If it were otherwise, wilderness boundaries would need to be miles from road corridors and exclude mountaintops from which the lights of a city may be visible. Such a practice would be contrary to everything Congress has said about designating wilderness. Yet the NPS applied such a yardstick to disqualify the Grand Sable Dunes.

Summary
Alternative E, even as modified as we propose, would designate only 28% of the park as wilderness. Motorboats will continue to operate in all of the waters within the park boundary, which constitute 27,000 acres (39%) of the park.

5.
PEER has also learned that, due to political pressure from the Department of the Interior, these waters will also be open to jet-skis, a decision that we would also oppose.

Under Alternative E, only those park areas qualified for wilderness preservation would be wilderness, with little or no disruption to established uses such as hunting, fishing, camping or motorboat use.

All of Beaver Basin, Chapel Basin and the Grand Sable Dunes qualify for a wilderness recommendation to Congress both under the NPS Management Policies (2001) and under the intent of the Wilderness Act. Senator Frank Church made this clear to then Assistant Secretary of the Interior Nathaniel Reed in the wilderness oversight hearings of May 5, 1972. Senator Church stated that

"[I]n the absence of good and substantial reasons to the contrary, (wilderness) areas within national parks should embrace all wild land. There is no lawful basis for massive exclusions (from wilderness recommendations) of qualified lands on
6. Please see responses 1 and 2.

Sincerely,

Jeff Ruth
Executive Director

cc: Senator Carl Levin
Senator Deborah Stabenow

which no development is planned." U.S. Senate Hearings, Subcommittee on Public Lands, May 5, 1972, pp. 59-60.

The NPS Draft proposes to exclude Chapel Basin and Grand Sable Dunes constitutes a major exclusion in proportion to the whole from a wilderness proposal in the absence of "good and substantial reasons."