



April 22, 2024

Sleeping Bear Dunes National Lakeshore  
Attn: Superintendent Scott Tucker  
9922 Front Street  
Empire, MI 49630

Dear Superintendent Tucker:

The National Parks Conservation Association (NPCA) writes to provide comments for the National Park Service (NPS) record related to the Leelanau Sleeping Bear Heritage Trail specific to Segment 9. NPCA requests the exploration of new alternatives with reduced environmental and cultural resource impacts.

Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System. NPCA and our 1.6 million members and supporters, including over 55,000 in Michigan, advocate for America's national parks and work to protect and preserve the nation's most iconic and inspirational places for present and future generations.

The Environmental Assessment, approved 15 years ago, found no significant impact at the time. NPCA acknowledges that since approval, there are new opportunities and community partners to provide diverse perspectives on strategies to achieve goals related to connectivity. **We encourage the exploration of alternatives that minimize environmental impacts while protecting this important trail.** Sleeping Bear Dunes National Lakeshore, like many parks across the region, has been negatively impacted by climate change. This has prompted the need to safeguard cultural resources and create resiliency for park resources more actively.

Segment 9 was identified as the preferred alternative chosen for extending the Leelanau Sleeping Bear Heritage Trail in an Environmental Assessment (EA) completed by NPS in 2009 (Service, Leelanau Trailway Plan FONSI, 2009). While we appreciate the desire to increase connectivity by extending the trail, there are concerns about the impact this project could have on park resources, including sensitive dunes, ephemeral wetlands, wildlife habitat, and culturally significant resources. Many of these unique features are the very reasons that Congress designated the landscape as a national park.<sup>1</sup>

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<sup>1</sup> Sleeping Bear Dunes enabling legislation states, in part: "Congress finds that certain outstanding natural features, including forests, beaches, dune formations, and ancient glacial phenomena, exist along the mainland shore of Lake Michigan...and that such features ought to be preserved in their natural setting and protected from developments and uses which would destroy the scenic beauty and natural character of the area." (Public Law 91-479).

There are efforts by NPS to reforest Great Lakes National Parks, including Sleeping Bear Dunes National Lakeshore, due to pests and diseases killing off several species of trees that often lead to trail closures (Service N. P., 2024). Efforts have included grafting resilient trees for future planting and prescribed burns to increase diversity within and adjacent to the proposed trail. Under the current alternative, the trail will need to be constructed in the State of Michigan's regulated critical dunes requiring a 15 ft. retaining wall, extensive boardwalks through wetlands, reduction of canopy cover and habitat through the removal of 7,300 trees some culturally significant to the Odawa. A trail within this area would exacerbate impacts to forest diversity and water quality.

NPCA requests the exploration of new alternatives with reduced environmental impacts to our beloved trail and associated resources. We welcome the opportunity to serve as a thought partner as interested groups are engaged on this issue. Thank you for your consideration.

Sincerely,

*Kira Davis*

Kira Davis  
Great Lakes Senior Program Manager  
National Parks Conservation Association, Midwest Region