

RE: Isle Royale Boaters Association Response to Environmental Assessment to Siskiwit Bay Dock Project.

The Isle Royale Boaters Association members are opposed to the removal of the Siskiwit Bay dock for the following reasons:

- As stated by the NPS, the Siskiwit Bay dock and campground is one of the top ten most visited campgrounds during 1998. These visitation numbers include boater's numbers which are significant. This is denying access of most boaters to this area of the island. The use of mooring facilities does not provide for safe harbor while camping at Siskiwit Bay campground. In addition, most boats that visit Siskiwit Bay campground do not carry tenders.
- Boaters often hike the trails of Isle Royale from a dock site. Boaters also enjoy hiking the island trails and are now being denied access to a large portion of the trails of Isle Royale. This substantive issue has not been address in the EA. "NPS Management Policy §8.1.1 states that besides resource protection "the fundamental purpose of all parks also includes providing for the enjoyment of park resources and values by present and future generations." Dock removal or replacement will impact boaters and other visitors' experiences at the park. " By taking out the Siskiwit Bay dock the NPS is violating fundamental rights of ALL park users equal rights to enjoy all aspects of Isle Royale.
- The Siskiwit dock is healthy as stated by the NPS. "The dock remains structurally sound with only slight warping of the dock." The removal of Siskiwit Bay Dock is predicated on a few aerial photographs showing the sedimentation of sand and gravel buildup around dock and breakwall that have occurred for the past 60 or so years in a non-wilderness area with no removal of sediment during that time. The people have enjoyed this area for 60 plus years and the NPS has not adequately address the use and enjoyment by the people relative to the removal of the dock. Nowhere in the EA has the NPS shown a significant impact of sedimentation causing coastal problems other than a director's orders. If proper dredging maintenance had been performed over the years, there would still be 245 ft of usable dock space to users. Even if the breakwall causes the natural flow of water and sediment to be diverted from the nature path, what damages to the shoreline have been documented to cause this major action? The conclusion to the no-action alternative as stated by the NPS is " Conclusion: Overall the no-action alternative would continue to impede longshore sediment transport in the area and require maintenance dredging over roughly 6300 ft² around the dock. No cumulative impacts are expected." The NPS's only conclusion of the environmental consequence of no-action is "No Cumulative impacts are expected". By not choosing the no-action alternative is to remove a structurally sound dock that has been enjoyed by hikers and boaters for the last 60 years.

- Regarding cumulative impacts: the NPS states: “cumulative (incremental impacts from the project in the context of past, present and reasonably foreseeable future actions regardless of actor)”. Of the three alternatives, the no-action alternative has the least impact to Isle Royale and provides the most enjoyment of Isle Royale by the visitors. NPS Management Policy §8.1.1 states that besides resource protection “the fundamental purpose of all parks also includes providing for the enjoyment of park resources and values by present and future generations.” Dock removal or replacement will impact boaters and other visitors’ experiences at the park.
- Comments concerning offset due to the loss of dock space and campground facilities to boaters. Impact of Siskiwit Dock removal on boaters at Isle Royale. A comparative analysis of “offset” of existing conditions versus the NPS preferred alternative.
- In the General Management plan (pg 34) it states that "Docks would be removed from a few campgrounds to reduce noise and better meet the expectations of hikers and paddlers in these areas. Similarly, several new campgrounds with docks for motorboaters and paddlers are proposed in areas that are not accessible by trail. Docks would not be removed until the new docks in the vicinity were available for public use". Dock space built in Windigo to offset dock space for removal of Siskiwit is not replacements for dock space in the Siskiwit Bay area.

Facts pertaining to Siskiwit Dock:

Siskiwit original dock length: 245 feet on two sides, total linear length 490 feet
 Siskiwit current dock length: usable dock length due to NPS neglect, two sides, 300 feet, (The NPS claim of 100 feet of at least 2-3 ft of water depth is false. There is no substantiation of this in the EA and is in direct contradiction to the experience of boaters at Isle Royale.)

Facts pertaining to “replacement” docks:

Hay Bay original dock length (pre new dock): 50 feet, two sides, total linear length 100 feet.

Hay Bay new dock: 50 feet, two sides, total linear length 100 feet.

Hay Bay provides NO NEW DOCK SPACE.

Wright Island: 54 feet usable on one side only, total linear length 54 feet.

Windigo: 3 docks at 24 feet, two sides, total linear length 144 feet. These docks are irrelevant to the area of Siskiwit Bay, they are thirty miles from the Siskiwit area.

Facts pertaining to Campgrounds:

Siskiwit: 2 shelters and 7 campsites

Hay Bay: one tent site no shelters

Wright Island: Currently no shelters or campsites. IF a future EA adopts an alternative that includes campsites, an unknown number would be built.

Windigo: No new shelters or campsites.

Facts pertaining to the access of Isle Royale trails:

Siskiwit: Currently provides access to Isle Royale trails. Future mooring buoys would provide little to no access for the majority of boaters, do to the fact most don't have tenders.

Hay Bay: No access to Isle Royale trails.

Wright Island: No access to Isle Royale trails.

Windigo: Provides access to Isle Royale trails. Access to these trails are irrelevant to the area of Siskiwit Bay, they are thirty miles from the Siskiwit area.

Offset Analysis –Dock Space

Currently available linear dock length: Siskiwit 300 feet, Hay Bay 100 feet. Total of 400 feet.

Future available linear dock length not including Windigo: Hay Bay 100 Feet, Wright Island 54 feet.

Total of 154 feet.

Net change in available linear dock length. **A loss of 246 feet of dock (62% Loss.)**

Currently available linear dock length including Windigo: Hay Bay 100 Feet, Wright Island 54 feet, Windigo 144 feet. Total of 298 feet.

Net change in available linear dock length. **A loss of 102 feet of dock (26% Loss.)**

Offset Analysis –Campgrounds

Currently available not including Windigo: Shelters 2, Campsites 7.

Future available: Shelters 0, Campsites Unknown.

Net change in available campsites could very well be a negative 7 if the future EA alternative does not include campsites at Wright Island. A potential **TOTAL LOSS** of available campsites.

The NPS has already stated there will be no new shelters. This is a **TOTAL LOSS of SHELTERS** available to boaters

Offset Analysis – Island Trail Access

With the proposed alternative there will be NO ISLAND TRAIL ACCESS.

Offset Analysis – Summation

As can be seen from the analysis above, there is significant loss of dock and campground facilities for boaters and an elimination of trail access.

- Boaters at Isle Royale not only like to experience the maritime aspects of the island; but just as much like to experience the island itself. It appears the NPS does not appreciate that boaters; just as hikers, backpackers and paddlers; love the island. The proposed action, in a biased manner, reduces boater's access to Isle Royale campsites, shelters, and trails.
- NPS Management Policy §8.1.1 states that besides resource protection "the fundamental purpose of all parks also includes providing for the enjoyment of park resources and values by present and future generations." Dock removal or replacement will impact boaters and other visitors' experiences at the park.

- Since dredging has never occurred at Isle Royale, to now include it as a possibility in both the description and impacts sections of the No Action Alternative, invalidates the No Action Alternative. This “no action” was not fully considered along with Alternatives A and B. The Draft EA should be amended to include this “no action” as an “action alternative” along with the original two, so that the proposed three actions can be analyzed along with a No Action Alternative that does not suggest an action that has never occurred.