



August 5, 2013

Mr. Eric Ehn  
Management Assistant  
Indiana Dunes National Lakeshore  
1100 N. Mineral Springs Road  
Porter, IN 46304

Dear Mr. Ehn:

Save the Dunes is pleased to provide these comments on the Environmental Assessment (EA) for the Wabash Avenue/Porter Access Site released by the National Park Service July 10<sup>th</sup>, 2013.

Porter Beach provides access to the beach for many members of the Porter community, as well as visitors to the Indiana Dunes National Lakeshore from outside the region. The recent addition of a bathhouse to the beach, which replaced portable restrooms, greatly improved the experience of people visiting the beach. Additional planning, if developed inclusively and with sensitivity toward the needs of both residents and the environment, presents an opportunity to further enhance the site.

Save the Dunes appreciates the effort that the National Park Service has put into the Environmental Assessment for Wabash Avenue/Porter Access Site. Addressing the erosion problems associated with the foot-wash station and installing barriers around natural areas often disturbed by visitors are necessary steps for protecting the fragile dune ecosystem at Porter Beach, and Save the Dunes is glad to see these measures mentioned as actions common to all alternatives.

In addition to these protective measures, we are also in favor of the proposed safety improvements to Wabash Avenue mentioned in Alternatives 2 and 4. In its current state, the pedestrian route from the parking lots to the beach poses a significant safety threat. Raising, widening, and curbing the sidewalk is necessary to protect pedestrians. Save the Dunes recommends that National Park Service (NPS) coordinate with the Town of Porter regarding sidewalk construction along Wabash Avenue; it is our hope that Porter may also be interested in implementing safety measures along their section of Wabash Avenue. Aligning the projects would certainly produce the most effective result.

While Save the Dunes is in support of the proposed features listed above, there are components of certain EA alternatives that Save the Dunes finds inappropriate for the Porter Beach site. Save the Dunes is strongly opposed to plans that include parking lot expansion, construction of overflow lots, or other similarly disruptive projects. For example, the expansion of the southern parking lot proposed in the preferred alternative is not a suitable modification for the Porter Beach site. Expanding parking lots and building new roads will disturb natural areas and will not adequately address issues of congestion. The size and nature of the Porter Beach site is simply not compatible with the increased capacity that the preferred alternative encourages in adding 100 additional parking spaces.

While several of the alternatives include parking lot expansion or construction, the language in the EA did not convey that such options were under consideration or part of the EA process. The EA focused on



improving visitor access, not expanding it. Listed as a Project Objective on page 13 of the EA, the Porter Beach modifications are meant to “Emphasize better visitor accommodation for existing levels of visitation; the project is not designed as an effort to increase the number of visitors”. This statement directly contradicts proposed plans for additional parking, which would increase the number of visitors without properly addressing the specific limitations and needs of this site. Additionally, in an article in the Chesterton Tribune on August 11, 2011, Superintendent Constantine Dillon publicly opposed the construction of expanded parking lots, stating, “You don’t want to build giant parking lots that you only need for a few weekends a year. If you do, they’ll be empty 99 percent of the time”<sup>1</sup>. The public scoping documents and open house also indicated that parking lot expansion and construction would not be an element of the Porter Beach modification, and instead included language that suggested upgrades within the existing footprint.

On page 47 of the EA, the numbers used to illustrate the immediate need for increased traffic flow are cited as 2011 traffic counts. We were unable to locate the source of these numbers and we ask that NPS include that information in future reports. We feel that a formal traffic study is needed prior to making conclusions about parking or traffic flow and that all necessary information should be properly collected before releasing an EA.

We also believe that additional parking will not solve congestion challenges faced during peak summer months. If parking were expanded, the site would likely receive even more visitors, placing additional pressure on enforcement resources. We suspect that enforcement resources are already strained in managing these additional crowds, and we are unsure of what burden this would place on the Town of Porter and NPS staff in terms of law enforcement time and traffic management costs. Save the Dunes feels that this baseline information should be carefully researched before recommending parking modifications that would increase the number of visitors accessing Porter Beach.

Concerning traffic patterns and road access, special care should be taken in the natural areas surrounding current infrastructure at Porter Beach. This is particularly important in relatively undisturbed areas adjacent to the site that contain conservative native species such as prickly pear cactus, sumac and hoary puccoon. We strongly encourage the National Park Service to consider traffic solutions that do not require the construction of any new roads. Road construction proposals as mentioned in Alternatives 3 and 4 would potentially result in habitat degradation and erosion. Instead, solutions such as moderate widening of Wabash Ave. and/or construction of a low median or barrier through the middle, or other forms of traffic flow enhancement should be considered.

Save the Dunes is pleased that larger structures such as a visitor center, pavilion, restaurant, or concession stand are not included in any of the alternatives. However, we feel that picnic shelters should also not be included in Porter Beach modifications. Siting picnic shelters north of the Porter lot is problematic, because the area is prone to flooding when Lake Michigan’s water level rises. In fact, in the not-too-distant past, lake levels were high here. We question the appropriateness of using funds to install a structure that will likely be prone to wave damage and erosion. It would also awkwardly suggest that the shelter is a Town of Porter amenity rather than an NPS amenity because of its adjacency to the Town’s parking lot. The alternate option, which would site the picnic shelters to the east of either the

---

<sup>1</sup> [http://chestertontribune.com/Environment/911119%20indiana\\_dunes\\_national\\_lakeshore.htm](http://chestertontribune.com/Environment/911119%20indiana_dunes_national_lakeshore.htm)



north or south parking lot, would disturb the surrounding natural area. Frankly, we suspect the shelters may be poorly utilized due to the distance from the beach. Save the Dunes does not feel that compromising the health of the ecosystem is worth the construction of these picnic shelters.

Material concerns aside, we would like to express our concern over the format in which the National Park Service chose to discuss possible improvements to the area. The Open House format employed for the EA did not serve the pressing need for open dialogue. We believe the onus ultimately falls to the facilitators of the meeting to listen and respond to public concerns in an open and transparent forum. Save the Dunes suggests avoiding the use of the Open House format in future public engagement sessions, and recommends a process through which the public can voice its concerns and hear feedback from NPS.

In the same vein, we believe that the National Park Service may have been disingenuous with the public when it claimed at the forum that no plans had been formulated for the site. Superintendent Dillon has been speaking in the media of specific plans for the site since as early as August of 2011 (See "Indiana Dunes National Lakeshore's Dillon talks about Porter Beach at meet-and-greet" in Chesterton Tribune, August 11, 2011 at [http://chestertontribune.com/Environment/911119%20indiana\\_dunes\\_national\\_lakeshore.htm](http://chestertontribune.com/Environment/911119%20indiana_dunes_national_lakeshore.htm)). While we support the inclusion of the public in the earliest stages of the planning process, to potentially mislead the public merely breeds suspicion and distrust toward the park. In this case, the facilitators should have been open about the history of plans at Porter Beach. This approach would have helped clarify the scope of the work to be discussed and cleared the air of unwarranted suspicion.

These procedural concerns aside, Save the Dunes supports the thoughtful management of Indiana Dunes resources and acknowledges that, in many cases, real opportunities to improve the experience of visitors while protecting the park's natural resources exist. We support the Indiana Dunes National Lakeshore's efforts to address issues at Porter Beach and hope that real improvements are achieved in the areas of need identified.

Thank you very much for your consideration of these concerns.

Sincerely,

A handwritten signature in black ink that reads "Nicole Barker". The signature is written in a cursive, flowing style.

Nicole Barker  
Executive Director