



July 23, 2018

Meridian Hospitality Group  
55 Erieview Plaza, Suite 328B  
Cleveland, OH 44114

Dear Sir/Madam:

Save the Dunes is an organization established in 1952 with a mission to preserve, protect and restore the Indiana dunes and all natural resources in Northwest Indiana's Lake Michigan Watershed for an enhanced quality of life. Over 30% of our membership are residents of Gary's Miller neighborhood, and recreate at Lake Street Beach, Marquette Park, and the adjoining Chanute Trail. Lake Michigan and our Indiana dunes are critical parts of our Region's identity and quality of life. The protection of these resources is imperative to current and future generations who live, work, and play in Northwest Indiana.

We appreciate the opportunity to participate in the public comment process on Meridian Hospitality Group's conceptual renderings for the 90+ acre footprint located at Gary's Lake Street Beach, referred to as NewGary Northwest Indiana Waterfront Development. One of our greatest concerns regarding the proposed renderings is their lack of public input to date as well as the lack of consideration given to existing planning efforts in the region. A proposal that includes such extensive development and substantive changes to the current land must be highly public and incorporate the community's input throughout the process. The following comments outline our concerns regarding the conceptual renderings presented to date:

**Comment 1: The proposed plans threaten critical dune and wetland complexes, compromising the ecological value, recreational benefit, and community character that they provide.** The existing Gary dune and wetland complexes that characterize a significant portion of the 90+ acre footprint are highly revered and demand protection. Although Meridian Hospitality Group emphasizes the need to protect these areas, the conceptual plans would significantly alter the natural landscape, reducing the amount of natural features present in this area and further contributing to its degradation. Furthermore, this area is treasured as an area by the community as a place of passive recreation. The proposed plans would greatly alter its existing use as well as develop structures out of line with what the community values for this area. That said, opportunity to enhance passive recreation as well as existing facilities, such as the armory and concession stand, are a better fit for transformation rather than surrounding natural lands. The basis for these claims are further described in Comment 2.

**Comment 2: The proposed plans are contradictory to guiding regional and local plans, including the Marquette Plan and the Miller Neighborhood Spotlight Environment and Ecotourism Plan.** Phase I and II of the Marquette Plan, championed by Congressman Pete Visclosky, the Indiana Department of Natural Resources, regional communities including the City of Gary, and with input from residents and visitors of the lakefront, provide a comprehensive land use vision to guide reinvestment efforts to reclaim Indiana's lakefront as a livable lakefront. The Marquette Plan is guided by three principles. First, 75 percent of the lakeshore should be available for free, open, public use. Second, development should be set back by a minimum of 200 feet from the water. Third, there should be a continuous biking and



walking trail parallel to the shoreline for all Northwest Indiana residents to enjoy. In 2018, the Northwestern Indiana Regional Planning Commission released the Marquette Action Plan which identifies a range of actions, vetted by the community, to steward lakefront access while balancing the protection of sensitive ecological features. The Marquette Action Plan identifies the 90+ acre footprint and the community's desire to enhance existing amenities and increase way-finding signage. This area is identified as an area suited for passive recreation interests and a desire for the land to remain natural. Additionally, conceptual plans appear to violate the Marquette plan's urgency for keeping the lakefront free from additional development and with a 200 foot setback. Furthermore, in 2015, the Miller Neighborhood Spotlight Initiative, a community-led effort to plan for community revitalization, developed a localized plan for Ecotourism and the Environment that emphasizes creating awareness about existing amenities, promoting passive recreation and way-finding signage throughout the myriad of existing natural areas. The proposed Meridian Hospitality Group's conceptual plans differ tremendously from the intention of the community members who created these plans for this area and does not reflect the desired interests of those who live, work, and play in Gary.

**Comment 3: The proposed plan may prove contrary to the recent Indiana Supreme Court Ruling, Gunderson et al. v. State of Indiana et al.** Early 2018, the Indiana Supreme Court ruled that the boundary separating public trust land from privately-owned riparian land along the shores of Lake Michigan is the common-law ordinary high-water mark and that, absent an authorized legislative conveyance, the State retains exclusive title up to that boundary. After recent communication with the City of Gary Redevelopment Commission, we are aware that Meridian Hospitality Group does not hold exclusive right to acquire the 90+ acre footprint. However, should transfer occur and any attempts be made by a private entity such as Meridian Hospitality Group to develop below the Natural Ordinary High Water Mark, this would infringe on the rights of the citizens of Indiana. As shown in the Advanced Rendering II, the Faith and Celebration Pavilion, pier, beach bleachers, and possibly additional structures may compromise the public trust doctrine.

**Comment 4: The proposed plans perpetuate poor coastal zone management and reduce shoreline protection.** The dunes serve as a natural barrier to the destructive forces of wind and waves, serving as the first line of defense against coastal storms and beach erosion. They absorb the impact of high waves, preventing or delaying flooding of inland areas and damage to inland structures. They are also sand storage areas that supply sand to eroded beaches during storms and buffer windblown sand. Indiana has made progress in protecting its naturalized shorelines by not adding further development on the lakefront. The proposed structures would decimate this natural protection area. Furthermore, the 2013 Shoreline Environmental Impact Statement led by the National Park Service at Indiana Dunes National Lakeshore clearly identifies a range of major impacts of having breakwaters and other such structures in the lake including large-scale sand accretion and starvation. The presented conceptual plans would further perpetuate these negative impacts. Save the Dunes is strongly against any additional structures including the breakwater and boat slips from being placed in the Lake.



**Comment 5: The National Park Service at the Indiana Dunes National Lakeshore remains an uninformed stakeholder.** It is a grave concern to Save the Dunes that Meridian Hospitality Group sites the National Park Service at Indiana Dunes National Lakeshore as a group engaged in this planning process as well as a key user of structures developed in the footprint. As a key partner to the National Park Service, we have met with Superintendent Paul Labovitz and it was shared that no engagement has taken place with the Park or its leadership. To suggest the National Park Service at the Indiana Dunes National Lakeshore is a part of these plans without their knowledge is misleading and fosters a false sense of support for the project.

Overall, Save the Dunes opposes the conceptual renderings that have been produced by Meridian Hospitality Group. We firmly believe that any development of the natural areas between Lake Street Beach and Marquette Park would result in tremendous negative impacts to our dune and wetland ecosystems as well as negate the direction in which the community would like to see this area utilized. We do, however, support the idea of revitalizing existing disturbed footprints such as the armory as well as the concession stand. Ecotourism is of great potential to the City of Gary and could be enhanced by specifically focusing efforts on these key areas rather than the dunes and wetlands.

Lastly, we would like to share the quote delivered by Carl Sandburg which we feel best summarizes the significance of this natural area— “Those dunes are to the Midwest what the Grand Canyon is to Arizona and the Yosemite to California. They constitute a signature of time and eternity. Once lost, the loss would be irrevocable.”

Again, we appreciate this opportunity to comment and look forward to your response.

Respectfully,

A handwritten signature in blue ink that reads "Natalie Johnson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Natalie Johnson  
Executive Director