Below are suggested talking points that you may use to personalize your letter to the Department of Environmental Quality regarding the Singapore Dunes property between the Kalamazoo River mouth and the Saugatuck Dunes State Park.

All of us who care about our community and the extraordinary Saugatuck Dunes need to make sure by our presence at the Monday August 26th public hearing (and our letters) that the Michigan Department of Environmental Quality (MDEQ) understands that this road request is NOT in the public interest and does NOT meet the standards required. And it is equally important to voice support for the public acquisition of this land because this is the best way to serve the public interest!

What follows are additional details that further explain why the road permit(s) should be denied:

GENERAL/TECHNICAL/ADMINISTRATIVE OBJECTIONS

- The application is incomplete.

THREAT TO WETLANDS

- The proposed road will damage the globally imperiled interdunal wetlands according to Professor Lissa Leege, who has studied these specific wetlands for over twenty years. In her December 15, 2012 letter to the Saugatuck Township Planning Commission and the DEQ, she writes:

  “One of the key features of this dune system is the extensive interdunal wetlands, also known as dune slacks or wetpannes. This is a unique and critical habitat in this otherwise arid and wind-regulated system. Wetpannes hold water near the soil surface and support an incredible diversity of plant and animal species found nowhere else in the dunes. This special hydrology is a life support system to the whole dune complex and is easily disrupted. Without functional wetpannes, the integrity of the dune system is threatened and the critical ecosystem services provided by the dune system will be compromised.

The current proposal for the placement of a road and series of houses throughout the wetpanne in the tract south of Saugatuck Dunes State Park Natural area, if implemented, would do irreparable damage to this critical dune habitat. Once altered, wetpanne hydrology is not readily restored. The wetpanne system is interconnected throughout the dunes, and impacts will not just be isolated to the location of the development.

The construction of a road through the wetpanne in this pristine dune habitat would be a shortsighted decision with long-term negative consequences for this world-class resource. The treasures of this precious habitat are far too valuable to allow its
destruction for the benefit of a few. I sincerely hope that you will consider the long-term consequences of the actions of development and make a decision based on protecting a habitat that is not only unique around the world, but that in its current, undeveloped state, provides irreplaceable ecosystem services and a spectacular economic resource in recreation and tourism.”

- Kristi Sherfinski, a wetlands specialist, has also written letters detailing her concerns with the development as it is proposed. Ms. Sherfinski used the wetlands on the Singapore Dunes’ property as part of her Master’s Thesis research project.

- Professor Peter Murphy has sent over 1,500 students into the Saugatuck Dunes and has overseen seven dissertations specific to the Saugatuck Dunes. Professor Murphy has been intimately familiar with the dunes and wetlands in question for more than forty years. Professor Murphy’s letter of October 1, 2012 to the Saugatuck Planning Commission and DEQ begins by stating:

  “At the outset, I wish to state that I believe the proposed development of the sand dune tract to the south of Saugatuck Dunes State Park is entirely inconsistent with the public interest. In my opinion, it would be damaging not only to one of the State’s – and indeed the World’s – most important and famous natural ecosystems, but it would also harm the high standing of our State with regard to the many tourists and other visitors who come to our region to enjoy nature at its finest and to experience natural features unavailable elsewhere.”

THREAT TO HISTORICAL SITES
The proposed road threatens historically significant sites – both Native Peoples & the Historic Singapore Settlement

- Professor Peter Murphy’s letter also addresses concerns with the archaeology of the site:

  “In the just-published book by W.A. Lovis, A.F. Arbogast and G.W. Monaghan (2012), *The Geoarchaeology of Lake Michigan Coastal Dunes*, it is stated (on p. 16) that “The importance of coastal zones to the precontact inhabitants of Michigan cannot be overstated, as witnessed by the abundance of archaeological sites spanning several millennia recorded in coastal contexts...”. And on p. 38 there is a map showing the major dunes and dunefields in Michigan. There are only five such areas on Lake Michigan and the Saugatuck Dunes are one of them, which I find quite remarkable. So, in addition to the natural features for which Saugatuck is known, we also need to consider its known and potential archaeological significance.”

- Professor James Schmiechen has also voiced concerns with how the proposed
road, and development, will impact the archeological site of the buried ghost town of Singapore, specifically the Singapore cemetery.

- As the proposed project would ‘damage or destroy features of archaeological or historical significance’ an environmental impact statement is required before the DEQ can consider granting the permit. It is important to remember that the original Saugatuck Dunes State Park Master Plan unanimously approved by the Natural Resource Commission in 1981 included expansion plans that included most of the Singapore Dunes property. As specified in the plan, an expansion into the now-Singapore Dunes property would have featured a “Historic Zone: Area of historic significance to be set aside for future interpretation of the village of Singapore (should the property involved become public ownership)” [Appendix B, page 13].

- The Saugatuck Douglas Historical Society has issued the following statement regarding the potential damage by development to historic resources in our community:

  “The built environments of our towns and the natural lands, vistas, and historic and archeological sites of the Lake Michigan lakeshore and along the Kalamazoo River are irreplaceable assets. They are vital to the quality of the community’s cultural life as well as its economy. The Society asserts that any development that devalues the historic townscape, landscape or view sheds, or diminishes our ability to understand or commemorate our varied history, should be considered a “taking” from the people of the region.

  The Society urges local, state and federal governments to recognize the significance of these unique historical assets and to protect them from development or activities that would alter the areas character or appearance.”

CONFLICTS WITH LONG-TERM PUBLIC PLANNING

The proposed road does not comply with the Tri-community Master Plan or regional and state planning goals and initiatives

- The proposed road through the interdunal wetlands is not in the public interest. According to Professor Lissa Leege, impacts to the interdunal wetlands on the Singapore Dunes property will impact the Saugatuck Dunes State Park Natural Area. The September 23, 2012 report to Governor Snyder, The Future of Michigan’s Parks and Outdoor Recreation, clearly articulates that protection of the natural resources is in the public interest.

  “When the panel’s vision is achieved, the state will be protecting important recreational, natural, cultural, historic, and prehistoric resources” [page 9]
- "In order to maintain, enhance, and provide valuable interactions with and interpretation of Michigan's high-quality outdoor recreation areas, the state must protect rare, unique, and representative natural, cultural, historic, and prehistoric assets." [page 12]

- "Michigan's parks and outdoor recreation areas are true gems, and should be viewed by the state and all of our residents as critical assets for advancing Michigan's prosperity. They return dividends – social, ecological, and economic – that far exceed the investments made by the state and other public and private partners. These resources are part of our state's identity, and an increasingly important part of how we reflect ourselves to the world." [page 33]

- The proposed road through the interdunal wetlands is not in the public interest. According to Professor Lissa Leege, impacts to the interdunal wetlands on the Singapore Dunes property will impact the Saugatuck Dunes State Park Natural Area. The August 15, 2003 report to Governor Granholm, *Michigan's Land, Michigan's Future, Final Report of the Michigan Land Use Leadership Council*, clearly articulates that protection of the natural resources is in the public interest:

  “The principal purpose of the Michigan Land Use Leadership Council is to make recommendations to reform land use decisions in Michigan so that we can create sustainable and more livable communities... It is about: *Preserving ecologically significant natural habitats* and unique scenic resources that enhance the quality of life for state residents, attract visitors, and maintain biodiversity." [page 22]

  “It is important to be responsible stewards of the tremendous assets of our state found in our existing parks, recreation areas, open spaces, agricultural and forested lands, tribal lands, and waterways to provide renewable products, recreational opportunities, and the biodiversity required to sustain these natural systems. Cultural and historic resources throughout Michigan also play an important role in defining who we are and in building community pride. *The goal is to maintain the integrity of environmental and cultural assets* to sustain a quality of life that Michigan residents can point to with pride and pass on as a legacy to future generations." [page 25]

- Damaging the interdunal wetlands is not in the public interest. The West Michigan Strategic Alliance, in their November 2003, Green Infrastructure Task Force Final Report, cited the Coastal Dune System and Interdunal Wetlands of the Saugatuck Dunes as a priority ecosystem for preservation. The West Michigan Strategic Alliance views ‘protection of critical dunes and shorelines’ as a key regional priority.

  - The DNR study of the Kalamazoo River from September 2005 offers many ‘Management Options’ which support a Natural River Designation for the Mouth segment of the River. This underscores the public interest in increasing the proposed road set-back from the river. Allowing the proposed road so close to
The proposed road is not in the public interest as it contradicts the Tri-Community Master Plan that calls for protecting the dunes and wetlands, specifically these dunes and wetlands:

- **“The northwest corner of the Township**, along with the most of the land in Saugatuck west of the Kalamazoo lake should be preserved for public open space and the portion that remains in private ownership **should be maintained for low intensity uses (like the art colony and church camp).**” [Pg 10-7]

- “Although waterfront lands have a high revenue generating potential, a major attraction of both the Lake Michigan and Kalamazoo River waterfronts is their scenic, natural shorelines composed of forested sand dunes and large wetland areas. Should these natural areas be greatly damaged or destroyed through inappropriate development, then the “goose that laid the golden egg” will be dead.” [Pg 8-2]

- “The Plan seeks to define a balance between competing uses. **It places protection of the natural environment as first and foremost in making future land use decisions along the Lake Michigan and Kalamazoo River waterfronts.**” [Pg 8-2]

- “**Sensitive dune ecosystems also occur in the dune areas on either side of the Kalamazoo River mouth at Lake Michigan. This area is planned for protection** but details have yet to be finalized.” [Pg 8-6]

- “**Several vistas have public values that deserve protection. These include the entry into and exit from Lake Michigan on the Kalamazoo River**, the view from Mount Baldhead, the view of the Kalamazoo River from both ends, and approaches to the Kalamazoo River Bridge.” [Pg 8-26]

At great cost, the people of the Tri-Communities have followed through with the vision described in the Tri-Community Plan:

- Establishing the R-4 Lakeshore Open Space Zoned District in 2006 - this included the river mouth, Ox-Bow, Tallmadge Woods. (since revoked due to a settlement in a Federal lawsuit filed by Aubrey McClendon’s Singapore Dunes LLC [2012])

- Restricting Presbyterian Camp as ‘Camp’ with single family residences as ‘special use only’ [in 2005]

- Placing Tallmadge Woods into a conservation easement [in 2007]

- Assisting in the $20 million public acquisition of the Saugatuck Harbor Natural
The voters of Saugatuck Township even passed a millage in May 2010 to tax themselves in order to better support protections on local zoning that calls for protection of the natural resources. As Township Trustee Jim Hanson wrote:

"Today, the pressure the Township faces in maintaining its rules, regulations and ordinances is great. The Township wants to defend the land use goals in the 2005 Tri-Community Plan and the equitable treatment of all landowners. The only alternative to this defense is to abandon those good public policy goals that most residents of the area support, and allow the litigator with the deepest pockets to win every time."

THREAT TO THRIVING TOURIST ECONOMY
The proposed road degrades the natural landscape and compromises scenic viewsheds and habitats known to be primary tourist attractions

- The most important economic sector of the Saugatuck area is tourism. According the June 2002 Saugatuck 10-Year Strategic Development Plan, funded by the City of Saugatuck and the Saugatuck-Douglas Convention and Visitors Bureau, ‘tourism is the base industry in Saugatuck. Indeed, is it such a large part of the local economy, one could say that tourism is what Saugatuck does.’ [page 58] 53% of overnight visitors ranked Beach, Dunes Ride, and Hiking within the top four recreational activities; Beach and Dunes Ride were first and second. The report goes on to explain, ‘The beach also appears to be the primary attraction and activity for day trip visitors from the West Michigan region.’ [page 59]
Anything that degrades the outdoor recreational experience will potentially degrade Saugatuck’s tourist-based economy.

THREAT TO NEARBY PUBLIC AND PRIVATE LANDS
The proposed road fragments and degrades the ecosystem and reduces greenspace values

- The Singapore Dunes property is nearly completely surrounded by publicly-funded natural areas and unique outdoor educational opportunities (the Dune Schooner Rides and Pine Trail Camp). What negative impacts occur on the Singapore Dunes properties will have repercussions to the surrounding areas. This is addressed specifically by Professor Leege’s letter. I am also concerned
with the following:

- Removing more than 500 trees would create habitat fragmentation and degradation to the forested backdunes which is vital habitat to the State Threatened Cerulean Warbler which is found on the Singapore Dunes property and adjacent properties.
- Using over 30,000 yards of fill has the potential for introduce invasive species into the nearly pristine dunes ecosystem.
- Paving 200,000 square feet of dunes and interdunal wetpannes will create unnecessary runoff that, as the proposed plan details, will collect primarily in the wetpannes areas.

**UNDERMINES STATE, REGIONAL, COMMUNITY PLACEMAKING VISION**

This property should be acquired as an investment of the state to protect the public interest.

Below are additional details that further explain why the Singapore Dunes LLC property should be acquired and added to the Saugatuck Dunes State Park Natural Area which is in the public interest, and is the highest and best use of the property:

- This property is the first priority of our Tri-Community Master Plan: “Public acquisition of the Denison property on both sides of the Kalamazoo River is the top priority for the Tri-Communities.” Pg 13-2
  - We came together as a community – Saugatuck, Douglas, Saugatuck Township -- in a series of meetings between 2003 and 2005 to discuss and debate the land use issues that would determine future development decisions – this is our long-term economic vision for the community.
  - A significant number of citizens contributed to the process by attending two townhall-style meetings, filling out a survey sent to every home in the tri-communities (with a 40+% return rate – unheard of for a survey that required an hour to complete), and by participating in interviews and other meetings.
  - The Master Plan cost nearly $100,000, was a two year process, and collectively well over 10,000 hours went into its creation.
  - The Master Plan was unanimously approved by Saugatuck, Douglas and Saugatuck Township.
  - This document clearly states what the people of the Tri-Communities regard as being in the highest public interest: protection and acquisition of the former Denison property.
• At great cost, the people of the Tri-Communities have followed through with the vision described in the Tri-Community Plan:

  ▪ Establishing the R-4 Lakeshore Open Space Zoned District in 2006 - this included the river mouth, Ox-Bow, Tallmadge Woods. (since revoked due to a settlement in a Federal lawsuit filed by Aubrey McClendon’s Singapore Dunes LLC [2012])
  ▪ Restricting Presbyterian Camp as ‘Camp’ with single family residences as ‘special use only’ [in 2005]
  ▪ Placing Tallmadge Woods into a conservation easement [in 2007]
  ▪ Assisting in the $20 million public acquisition of the Saugatuck Harbor Natural Area [in 2010]
  ▪ The voters of Saugatuck Township even passed a millage in May 2010 to tax themselves in order to better support protections on local zoning that calls for protection of the natural resources. As Township Trustee Jim Hanson wrote:

    “Today, the pressure the Township faces in maintaining its rules, regulations and ordinances is great. The Township wants to defend the land use goals in the 2005 Tri-Community Plan and the equitable treatment of all landowners. The only alternative to this defense is to abandon those good public policy goals that most residents of the area support, and allow the litigator with the deepest pockets to win every time.”

• There has been a steady and persistent effort to preserve this Cultural Landscape – The Saugatuck Dunes – that dates back to 1957 when the National Park Service did a survey of potential park sites along Lake Michigan. The Park Service study wrote:

    “By virtue of its fine beaches and scenic hinterlands, Saugatuck has a high public use value,” “Immediate steps should be taken to safeguard these values in order to meet the recreation demands of this region.”

• The Department of Natural Resources received many letters supporting a proposed expansion of the Saugatuck Dunes State Park to include the former Denison property as part of the Land Consolidation Strategy. The Department received over 100 letters supporting that expanded boundary in January 2004. (Many of the letters of support and official DNR Land Consolidation Strategy map are attached to this application.)

  ▪ [www.michigan.gov/dnr/0,1607,7-153-30301_31154_33787---00.html](http://www.michigan.gov/dnr/0,1607,7-153-30301_31154_33787---00.html)
  ▪ [www.saugatuckdunes.org/WhitePapers/Images/DnrSdspProjectBoundries646x627.jpg](http://www.saugatuckdunes.org/WhitePapers/Images/DnrSdspProjectBoundries646x627.jpg)

Many notable public leaders support expanding the Saugatuck Dunes State Park Natural Area to include the former Denison property, now the Singapore Dunes
property. Below are excerpts from letters by several key leaders:

- In a letter to the Natural Resource Trust Fund Board in 2009, Governor Milliken writes:
  “As a state, we need to preserve as much of the Saugatuck Dunes area as we can. It makes good economic sense in terms of tourism and recreation. And it is the right thing to do for our natural resources. The ecological significance of the Saugatuck Dunes has been detailed in an array of scientific studies and resource management plans. It has also filled the field notes of local birders with more than 170 species of birds, including breeding and nesting pairs of the Michigan-endangered Prairie Warbler.

  The historic, cultural, ecological, recreational resources of this land provide unique educational opportunities and will collectively drive a regional economy that is both durable and sustainable.”

- In a letter to the Natural Resources Trust Fund Board in 2009, Congressman Ehlers wrote:
  “This acquisition would be an essential first step in linking Saugatuck’s Oval Beach to the Saugatuck Dunes State Park Natural Area – a plan that’s been in the works for over fifty years.”

- Representative Peter Hoekstra wrote in 2007:
  “I write today to add my name to the list of supporters of the Saugatuck Dunes Coastal Alliance’s efforts to preserve and protect the Saugatuck Dunes coastal region in the Kalamazoo River Watershed.

  During my years of service, I have worked with local leaders to secure funding to preserve this natural habitat for future generations. It is obvious that the Saugatuck community has placed a high priority on the preservation of the former Dension property.

  This unique stretch of undeveloped Lake Michigan shoreline has contributed to an unparalleled quality of life for the citizens of Saugatuck and West Michigan. It is critical to the local tourism industry, heritage and environmental that this land remains protected.”