

**U.S. Fish & Wildlife Service**

# News Release

## *Midwest Region*



5600 American Boulevard West, Suite 990, Bloomington, MN 55437  
612-713-5360

**FOR IMMEDIATE RELEASE – April 7, 2016**

Contact: Rick Westerhof, 231-584-3553, [Rick\\_Westerhof@fws.gov](mailto:Rick_Westerhof@fws.gov)  
Marcy Hamilton, 269-925-1137 ext. 1525, [hamiltonm@swmpc.org](mailto:hamiltonm@swmpc.org)

### **Open House on Pucker Street Dam Removal Project April 14, 2016**

The U.S. Fish and Wildlife Service in partnership with the City of Niles, Southwest Michigan Planning Commission, Michigan Department of Natural Resources, Wightman & Associates and Inter-Fluve, will host an open house from 6:00 p.m. to 8:00 p.m. on Thursday, April 14, 2016 at the Law Enforcement Complex to receive input and comments from the public as part of an Environmental Assessment (EA) on the environmental impacts of the proposed removal of Pucker Street Dam.

**What:** Public open house on proposed Pucker Street Dam Removal  
**When:** Thursday, April 14, 2016 at 6:00 p.m. EST  
**Where:** Law Enforcement Complex, 1600 Silverbrook Avenue, Niles, Michigan 49120  
**Who:** U.S. Fish and Wildlife Service, Southwest Michigan Planning Commission, Michigan Department of Natural Resources, Wightman & Associates and Inter-Fluve

The EA under consideration will evaluate three proposed actions as pursuant to the National Environmental Policy Act (NEPA) process. These actions are:

- *No Action:* Leave dam in-place, maintain current water level above Pucker Street Dam.
- *Dam Removal with Active Restoration:* Actions would include removing the dam and associated structures, filling in the spillway and actively construct restored river/wetland complexes within dewatered pond area.
- *Dam Removal without Active Restoration:* Actions would include removing the dam and associated structures, filling in the spillway and allow passive/natural processes to establish river channel and associated bottomland wetlands.

Written comments may be made on forms provided at the meeting or may be directed by Thursday April 29, 2016 to:

Ms. Marcy Hamilton  
Southwest Michigan Planning Commission  
376 W. Main St, Ste 130  
Benton Harbor, MI 49022  
Email: [hamiltonm@swmpc.org](mailto:hamiltonm@swmpc.org)

*The mission of the U.S. Fish and Wildlife Service is working with others to conserve, protect and enhance fish, wildlife, plants and their habitats for the continuing benefit of the American people. We are both a leader and trusted partner in fish and wildlife conservation, known for our scientific excellence, stewardship of lands and natural resources, dedicated professionals and commitment to public service. For more information on our work and the people who make it happen, visit <http://www.fws.gov>.*

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**You're Invited.....**

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Written comments may be made on forms provided at the meeting. If you cannot attend the meeting, you may direct written comments by Thursday April 29, 2016 to:

Ms. Marcy Hamilton

Southwest Michigan Planning Commission

376 W. Main St, Ste 130

Benton Harbor, MI 49022

Email: [hamiltonm@swmpc.org](mailto:hamiltonm@swmpc.org)



## SUMMARY OF SCOPING COMMENTS

A total of 41 people submitted written comments during or after the scoping meeting held on April 14, 2016.

Twenty seven comments were received from fishermen that opposed the removal or were concerned about the dispersal of salmon/steelhead making catching fish more difficult, the impacts of sediment on the downstream fishery, the brown trout fishery upstream being negatively impacted and the potential negative impact to the Niles economy if the fishing opportunities were degraded.

There were 4 nearby landowners that support the dam removal. They cited the following reasons for support: improved view, remove an eyesore, a healthier river, and decrease silt buildup behind dam. A landowner did have a question about what the landscape would look like after dam removal. Two landowners had a concern about the amount of water that will be in the river after dam removal. One of these landowners supported the removal, but wanted the dam to be replaced with dirt and rock to create a waterfall. One landowner stated that removal was not happening quickly enough.

Six fishermen and fishing guides submitted comments in favor of dam removal. Michigan Trout Unlimited also submitted an email in support of the dam removal project. The reasons stated in these comments included support of native species, increase in fishing opportunities, increase in spawning area for steelhead and salmon, a healthier river, increase in tourism dollars from fishermen and kayakers, increase in safety downstream of dam and remove an eyesore.

There was one comment submitted that supported the dam removal, but suggested that a whitewater park be developed for increased tourism and improved fish habitat.

The content of the comments are summarized below.

Issue	Number of Comments
A decrease in fishing opportunity due to dispersed fish, sediment impacts downstream, destroyed brown trout fishery upstream will negatively impact local economy	27
Increase in fishing opportunities and support of native species	7
Increase in health of river	4
Improve views/remove eyesore	3
Decrease of silt behind dam	2
Improve safety below dam	2
Uncertain about amount of water in river after dam removal	2
Uncertain about appearance of landscape	1
Increase in tourism dollars	1
Removal has not been fast enough	1
Remove dam, but develop whitewater park	1



**PUCKER STREET DAM REMOVAL  
PROPOSED CONCEPT PLAN  
COMMENT CARD**



Thank you for your interest in the Pucker Street Dam Removal project. The proposed plan is intended to represent concepts in restoring the river habitats and resources that were altered and over time have degraded since the dam was constructed, thus becoming a more natural, free-flowing river.

After reviewing the proposed plan for the Pucker Street Dam Removal project, please give us your comments below.

Please **PRINT** the following information:

Name: JAMES BRITTON

Address: 2934 N. 5TH. ST.

City/State/Zip: NILES, MI. 49120

Phone: 269-683-8892

E-mail: JWBRITTON47@GMAIL.COM

What aspects do you like about the proposed plan?

GETTING RID OF THE SILT

What are aspects you do not like about the proposed plan?

NOT FULLY UNDERSTANDING WHAT IS GOING TO  
HAPPEN TO MY PROPERTY AT THE RIVER.

Other comments you would like to share?

I WOULD LIKE TO HAVE A MEETING OF PROPERTY  
OWNERS WITHOUT THE OUTSIDE INTERESTS DOMINATING  
THE MEETING BETTER EXPLAINING OUR PROPERTIES AND  
WHAT WE AS HOME OWNERS CAN DO TO LANDSCAPE  
AFTER THE RESTORATION IS COMPLETE

**THANK YOU FOR YOUR INPUT AND PARTICIPATION!**



## Marcy Hamilton

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**From:** Martin Hiller [marty@hillerfamily.us]  
**Sent:** Wednesday, April 20, 2016 3:37 PM  
**To:** mccauslin.2@nd.edu  
**Cc:** Marcy Hamilton; rhuff@nilesmi.org; nan3738@aol.com; GretchenCbutlergg@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John\_DiCostanzo@comcast.net; Joe Donnelly  
**Subject:** Please vote in favor of Tourism and Michigan Fisherman

Dear Planning Commission, Elected Officials, and City Employees,

I am writing you today to ask for your vote against removing the dam at Pucker Street. There must be other alternatives which align with multiple interests of all citizens. History has shown that removing a dam, like the one at Pucker Street, will harm fishing for a very long time. To be candid, I am an avid fly fisherman with a home in South Bend. Each year, I bring over 50 people to the river to experience the finest in salmon, steelhead, and trout fishing. We are a catch and release group. I am estimating that my group of anglers has an economic impact on Michigan and the City of Niles of 100 hotel rooms, 400 meals, plus additional spending in the local stores. A conservative figure would place just this group at an economic impact to the City of Niles of at least \$50,000. How much is the fishing of others contributing to the local economy?

Often, we are on the river in the Fall when little other economic impact occurs. The local merchants have shared this with me. Other times of the year, we share the river with kayakers, floating inter-tubers, and others. We peacefully coexist.

Should the dam be removed, we will find fishing elsewhere and will not be coming to your fine city.

I will participate in saving the dam, including fundraisers to rebuild or replace it with a new one that is a fully functioning hydropower. Please don't destroy a wonderful, natural gift that exists.

Sincerely,

Martin Hiller  
53438 Hansel lane  
South Bend, IN  
813.992.8820

DISCLAIMER: \* <http://hillercarbon.com/mail-disclaimer/> \*

## Marcy Hamilton

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**From:** jet.dds@frontier.com  
**Sent:** Thursday, April 21, 2016 8:48 AM  
**To:** Marcy Hamilton  
**Subject:** fishing the Dowagiac

To whom it may concern

I am a fisherman; I live in Ft Wayne, IN. I come to your neck of the woods to fish for Steelhead and Brown Trout. I understand you have plans to remove a dam just upstream of where I fish. Do you realize what a disaster it would mean for the fishing in the Dowagiac if that dam is removed. Please reconsider your plan, as I and others who fish in your river, will not longer be coming to Niles and that will most definitely impact your economy.

John Trok



## Marcy Hamilton

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**From:** Ken Mitchell [kamgjm@verizon.net]  
**Sent:** Thursday, April 21, 2016 10:20 AM  
**To:** Marcy Hamilton; mccauslin.2@nd.edu; rhuff@nilesmi.org; nan3738@aol.com; GretchenCbutlerrg@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John\_DiCostanzo@comcast.net  
**Cc:** rippleguides@hotmail.com; marty@hillerfamily.us  
**Subject:** Dowagiac River Fishing

I just received notice that the dam at Puckers Street is being considered for removal. I understand that if this takes place the fishing on the Dowagiac River will be mostly eliminated.

This is most disturbing.

Many businesses will suffer including the direct impact on the city of Niles. I have enjoyed fishing the Dowagiac and visiting your city and will not return to Niles and the area if this happens.

The fishing on the Dowagiac is very special and cannot be disrupted.

Please note my direct objection to this decision to remove the dam virtually destroying the Dowagiac fishing.

Sincerely,  
Ken Mitchell

## **Marcy Hamilton**

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**From:** Mark Ozog [ozogmark@gmail.com]  
**Sent:** Thursday, April 21, 2016 10:43 AM  
**To:** Marcy Hamilton  
**Subject:** city of Niles plans to remove the dam at Pucker Street

I want to speak against this plan.

I am a fly fisherman who lives in Great Falls MT and I travel to Niles MI to fish the Dowagiac River for the Steelhead and Salmon.

I meet friends from Chicago to fish this river and it is one of the most beautiful rivers I have fished in the Midwest.

When I go there, I stay at Motel in Niles, eat at local restaurants and go to local stores for supplies.

If this plan goes through the fishery will most likely never be the same and those tourist dollars will be lost.

I ask that this idea be abandoned and steps be done to protect this resource.

Sincerely

Mark F. Ozog  
Great Falls MT



## Marcy Hamilton

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**From:** wmkjgreenwald@comcast.net  
**Sent:** Thursday, April 21, 2016 7:01 PM  
**To:** Marcy Hamilton; mccaustin 2; rhuff@nilesmi.org; nan3738@aol.com; GretchenCbutlergg@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John DiCostanzo  
**Subject:** Dowagiac Riv Dam at Pucker St.

To City of Niles:

My local conservation clubs say that there are plans to remove the dam at Pucker Street which will disperse the steelhead and salmon over 150 more miles of streams in the Dowagiac watershed. This will virtually end the steelhead and salmon fishing on the Dowagiac River for many years to come. I oppose the removal of this dam.

Up to eight feet of sediment is trapped upstream of the dam and may cover vital spawning gravel when the dam is removed. This happened in a much smaller scale than what is now probable when the dam was opened in 1999, and the river is just now recovering from that disaster.

Removing the dam will also drastically impact the brown trout fishery above the dam. The dam acts as an upstream barrier for the predator fish that enter from the St. Joe. During the summer months, pike, walleye, and smallmouth enter the Dowagiac and feed on the brown trout below the dam. Trout fishing below the dam is very poor. Fishermen like me spend our dollars in Niles when we make the trip up for seasonal fishing. Please conserve this valuable fishery.

Bill Greenwald  
847-698-2126



**PUCKER STREET DAM REMOVAL  
PROPOSED CONCEPT PLAN  
COMMENT CARD**



Thank you for your interest in the Pucker Street Dam Removal project. The proposed plan is intended to represent concepts in restoring the river habitats and resources that were altered and over time have degraded since the dam was constructed, thus becoming a more natural, free-flowing river.

After reviewing the proposed plan for the Pucker Street Dam Removal project, please give us your comments below.

Please **PRINT** the following information:

Name: Timothy + Diana Mead

Address: 402 Mead Rd.

City/State/Zip: Niles, MI 49120

Phone: 269-687-8360

E-mail: Tmead@rmmfgco.com

What aspects do you like about the proposed plan?

We would like to see the removal of the  
dam + the dredging of the silt up the  
river.

What are aspects you do not like about the proposed plan?

Time frame, would like to see the  
project move faster.

Other comments you would like to share?

N/A

**THANK YOU FOR YOUR INPUT AND PARTICIPATION!**



## **Marcy Hamilton**

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**From:** Byrnes, Daniel [dpbyrnes@bsu.edu]  
**Sent:** Friday, April 22, 2016 4:36 PM  
**To:** Marcy Hamilton; mccaustin.2@nd.edu; rhuff@nilesmi.org; nan3738@aol.com; GretchenCbutlergg@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John\_DiCostanzo@comcast.net  
**Subject:** Dowagiac River

Mayor, City Planners and Administrators:

The Dowagiac River fishery needs your help. I understand the city of Niles plans to remove the dam at Pucker Street. This plan, as you may or may not know, will disperse the steelhead and salmon over 150 more miles of streams in the Dowagiac watershed. The vast majority of these miles are inaccessible due to deep water, no stream access, and private property. This will virtually end the steelhead and salmon fishing on the Dowagiac River for many years to come.

Up to eight feet of sediment is trapped upstream of the dam and may cover vital spawning gravel when the dam is removed. This happened in a much smaller scale than what is now probable when the dam was opened in 1999, and the river is just now recovering from that disaster.

Removing the dam will also drastically impact the brown trout fishery above the dam. The dam acts as an upstream barrier for the predator fish that enter from the St. Joe. During the summer months, pike, walleye, and smallmouth enter the Dowagiac and feed on the brown trout below the dam. The only thing that keeps this from happening in the quality trout fishery above the dam is the barrier that the dam provides. If you want to see what will happen to the trout fishery above the dam, look at the trout fishing below the dam. Unfortunately, the trout fishing below the dam is very poor.

I want to personally let the city and the planners and administrators know of this disastrous plan and how I feel about the end of your/our fishery. You should also know that while I fish there, I stay at hotels in Niles, fill my gas tanks in Niles, and eat at restaurants in Niles. I hope you let the businesses know that the spend that money I spend will end as I won't be coming into your area anymore if there aren't fishable numbers of fish in the river.

Thanks for your consideration of my comments.

Dan

Dan and Dina Byrnes  
2012 W. Petty Road  
Muncie, IN 47304  
765.717.3878



PUCKER STREET DAM REMOVAL  
PROPOSED CONCEPT PLAN  
COMMENT CARD



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After reviewing the proposed plan for the Pucker Street Dam Removal project, please give us your comments below.

Please PRINT the following information:

Name: JEANNINE E. GREGORY  
Address: 2851 CREEK RD.  
City/State/Zip: NILES, MICHIGAN, 49120  
Phone: 1-269-684-8589  
E-mail: \_\_\_\_\_

What aspects do you like about the proposed plan?

AN "EYE-SORE", FROM YEARS OF NEGLECT, WILL BE GONE.

"BACK TO NATURE" WILL TAKE OVER, WITH HOPEFULLY ENOUGH WATER TO MAINTAIN A BEAUTIFUL VIEW.

What are aspects you do not like about the proposed plan?

MY MAIN CONCERN IS HOW MUCH WATER THERE WILL BE ~~TO~~ LEFT TO NATURALLY KEEP A STREAM OR RIVER OF DECENT SIZE — NOT JUST A TRICKLE.

Other comments you would like to share?

AS FOR "FISHERMEN" — THERE IS NOT A SHORTAGE OF PLACES TO FISH. GO ELSEWHERE OR "UP" THE LICENSE FEES IN ORDER TO PROPERLY MAINTAIN EXISTING BLOGS.

THANK YOU FOR YOUR INPUT AND PARTICIPATION!



## **Marcy Hamilton**

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**From:** Lenn Grant [lenngrant911@yahoo.com]  
**Sent:** Tuesday, April 26, 2016 10:43 AM  
**To:** Marcy Hamilton  
**Subject:** Dowagiac river

Please consider leaving the dam at Pucker Ave. in place. There are many reasons that the dam should remain: keeping my plea simple :consider the economic impact. And consider that many fishermen are from other states , such as myself; that spend the time and money to visit the wonderful resources of your area: Thank you

Sent from my iPhone

## **Marcy Hamilton**

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**From:** David Holecek [davidholecek@me.com]  
**Sent:** Monday, April 25, 2016 4:31 PM  
**To:** Marcy Hamilton; mccausin.2@nd.edu; nan3738@aol.com; GretchenCbutlergg@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John\_DiCostanzo@comcast.net  
**Subject:** Dowagiac River Fishery

Dear Government Officials,

Please carefully consider the impact of the dam removal on the Dowagiac River Fishery . I travel 100s of miles from Illinois just for steelhead and salmon fishing on that river. Please don't destroy anything without careful environmental, biological, and economic considerations.

thanks,

David Holecek,  
Northern Illinois resident an Dowagiac River fishing enthusiast

## Marcy Hamilton

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**From:** Byrnes, Daniel [dpbyrnes@bsu.edu]  
**Sent:** Monday, April 25, 2016 3:55 PM  
**To:** Marcy Hamilton; mccaustin.2@nd.edu; rhuff@nilesmi.org; nan3738@aol.com; GretchenCbutlergg@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John\_DiCostanzo@comcast.net  
**Subject:** RE: Dowagiac River

All:

Thanks to those of you who responded.

After further investigation, I understand there is an option to repair the damn in lieu of demolishing it. I hope repairs are being considered.

Thanks again for your consideration of saving the fishery of the Dowagiac and future trips to your area.

Dan

Dan and Dina Byrnes  
2012 W. Petty Road  
Muncie, IN 47304  
765.717.3878

**From:** Byrnes, Daniel  
**Sent:** Friday, April 22, 2016 4:36 PM  
**To:** 'colcloughm@swmpc.org' <colcloughm@swmpc.org>; 'mccaustin.2@nd.edu' <mccaustin.2@nd.edu>; 'rhuff@nilesmi.org' <rhuff@nilesmi.org>; 'nan3738@aol.com' <nan3738@aol.com>; 'GretchenCbutlergg@aol.com' <GretchenCbutlergg@aol.com>; 'dvanden@qtm.net' <dvanden@qtm.net>; 'domerdurm@hotmail.com' <domerdurm@hotmail.com>; 'dmann@nilesmi.org' <dmann@nilesmi.org>; 'zmwrent@sbcglobal.net' <zmwrent@sbcglobal.net>; 'wskalla@sbcglobal.net' <wskalla@sbcglobal.net>; 'John\_DiCostanzo@comcast.net' <John\_DiCostanzo@comcast.net>  
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Up to eight feet of sediment is trapped upstream of the dam and may cover vital spawning gravel when the dam is removed. This happened in a much smaller scale than what is now probable when the dam was opened in 1999, and the river is just now recovering from that disaster.

Removing the dam will also drastically impact the brown trout fishery above the dam. The dam acts as an upstream barrier for the predator fish that enter from the St. Joe. During the summer months, pike, walleye, and smallmouth enter the Dowagiac and feed on the brown trout below the dam. The only thing that keeps this from happening in the quality trout fishery above the dam is the barrier that the dam provides. If you want to see what will happen to the trout fishery above the dam, look at the trout fishing below the dam. Unfortunately, the trout fishing below the dam is very poor.



I want to personally let the city and the planners and administrators know of this disastrous plan and how I feel about the end of your/our fishery. You should also know that while I fish there, I stay at hotels in Niles, fill my gas tanks in Niles, and eat at restaurants in Niles. I hope you let the businesses know that the spend that money I spend will end as I won't be coming into your area anymore if there aren't fishable numbers of fish in the river.

Thanks for your consideration of my comments.

Dan

Dan and Dina Byrnes  
2012 W. Petty Road  
Muncie, IN 47304  
765.717.3878

## Marcy Hamilton

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**From:** Ric Huff [rhuff@nilesmi.org]  
**Sent:** Wednesday, April 27, 2016 9:54 AM  
**To:** Marcy Hamilton  
**Subject:** FW: Pucker street dam

Richard A. Huff  
City Administrator  
333 N. 2nd Street  
Niles, Michigan 49120  
(269) 683-4700 X-3011



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**From:** Zick's Specialty Meats <[office@zicksmeats.com](mailto:office@zicksmeats.com)>  
**Date:** Wednesday, April 27, 2016 at 7:48 AM  
**To:** Ric Huff <[rhuff@nilesmi.org](mailto:rhuff@nilesmi.org)>  
**Subject:** Pucker street dam

I would like to throw my 2 cents in about the dam. There is a lot of confusion about the distruction of he dam. Most of it negative. Being a fisherman for 40 years on the Dowagiac above and below the dam I can tell you that it would be a very pad move to take it out. Listen to the fish biologist and fishing experts on this move and you will find that the bottom line is that it will hurt the trout fishery we have on both ends of the dam.

Thank you  
Garry Zick

--  
Zick's Specialty Meats, Inc.  
215 N. Mechanic Street  
Berrien Springs, MI 49103  
269.471.7121  
[office@zicksmeats.com](mailto:office@zicksmeats.com)

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## **Marcy Hamilton**

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**From:** Kory Boozer [info@boozersguideservice.com]  
**Sent:** Wednesday, April 27, 2016 11:21 AM  
**To:** Marcy Hamilton  
**Subject:** Pucker Street

Hello,

I just wanted to take a moment and drop you a note regarding the removal of the Pucker Street Dam.

I support the removal 100%

Not going to go into detail, but I believe it is what is best for the environment and we have a duty to the native species that will benefit from this removal to move forward with it.

Thank you,

Kory Boozer  
9828 Casey Ln  
Berrien Springs, MI 49103

C. 269.235.0664

E. [info@boozersguideservice.com](mailto:info@boozersguideservice.com)

W. [www.boozersguideservice.com](http://www.boozersguideservice.com)

**Marcy Hamilton**

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**From:** Steve Palbykin [skpalb@cox.net]  
**Sent:** Wednesday, April 27, 2016 4:37 PM  
**To:** Marcy Hamilton  
**Subject:** Dowagiac River Pucker Street dam

Sirs,

I am writing out of concern about the Dowagiac River fishery and plans to remove the dam at Pucker Street in Niles.

Removing the dam will dramatically impact the extremely valuable natural resource of the wild fishery and I fear damage it forever. The dam acts as an upstream barrier for the predator fish that enter from the St. Joe. During the summer months, pike, walleye, and smallmouth enter the Dowagiac and feed on the brown trout below the dam. The only thing that keeps this from happening in the quality trout fishery above the dam is the barrier that the dam provides.

Allowing the dam to be removed will undoubtedly negatively impact the economics of the area by removing any incentive for fishermen from around the country to fish this productive and wonderful natural wildlife resource.

Please consider this plea to prevent the removal of the dam.

Respectfully,  
Stephen J. Palbykin  
1441 E. Caroline Ln.  
Tempe, AZ 85284



## Marcy Hamilton

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**From:** Brett Hartford [hartford.brett@gmail.com]  
**Sent:** Thursday, April 28, 2016 7:29 AM  
**To:** Marcy Hamilton  
**Subject:** Pucker Street Dam Removal  
**Attachments:** P1010538.JPG

Hello:

My name is Brett Hartford, and I wanted to strongly express my support for Pucker Street dam removal. I am an avid angler, and travel all around the region chasing steelhead, trout, and salmon. I often by-pass the Dowagiac system and head to other systems due to the limited amount of water to fish below Pucker Street. Removal of this dam would bring me to the watershed many more times throughout the year, and is something that I would really be looking forward to.

Obviously I'm interested in the angling opportunities, but this is the right thing to do ecologically as well. Please put my vote in to remove Pucker Street Dam.

Thanks,

Brett Hartford  
[hartford.brett@gmail.com](mailto:hartford.brett@gmail.com)

## Marcy Hamilton

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**From:** tomgcouston [tomgcouston@att.net]  
**Sent:** Thursday, April 28, 2016 12:16 PM  
**To:** Marcy Hamilton  
**Subject:** Dowagiac River Pucker Street Dam Removal

I would like to offer a comment on the pending removal of the Pucker St. dam on the Dowagiac River near Niles. I fished the river regularly soon after the ladders opened, initially wading but eventually floating with our driftboat. We enjoyed great success with summer steelhead, fall salmon, and even a few fall/winter Michigan strain steelies. A few resident brown trout showed up from time to time. As the years went by, more boats floated the stretch, and we also saw fishing decline. We experienced the draw down and the years of resulting siltation.

I don't know if the decline was fishing pressure, the siltation, or the overall lower numbers in the Lake Michigan returns in general, but any potential increase in natural reproduction would, IMO, be welcome. This, it would seem, would involve removing the dam. More spawning areas would open up, and the river would eventually clear itself up. Of course, access and boat passibility would be key, especially upstream. This might also spread some of the fishing pressure.

In conclusion, I can't seem to recall a situation where dam removal hurt fishing or river quality overall. The only "bad" thing is it may spread the fish out more, but so will the crowds. So, as long as upstream access is addressed, I am in favor of the Pucker Street Dam removal.

Sent from my Verizon Wireless 4G LTE smartphone

## Marcy Hamilton

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**From:** David Koo [dkoo@roundtablehp.com]  
**Sent:** Thursday, April 28, 2016 1:54 PM  
**To:** Marcy Hamilton; mccauslin.2@nd.edu; nan3738@aol.com; GretchenCbutlergg@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John\_DiCostanzo@comcast.net  
**Subject:** Dowagiac River Dam

To: Southwest Michigan Planning Commission, Mayor of Niles, Niles City Administrator, Niles City Council Members

The Dowagiac River is a vibrant year-long fishery for anglers who enjoy catch and release fishing for steelhead, salmon and trout among other species. I fish the river 4-6 times per year and pay a professional fishing guide every time. I drive from Chicago, IL to come specifically to fish the Dowagiac so my fishing passion supports the local Niles economy. I understand discussions are underway which might result in removing the dam and as a result, this fishery will be destroyed for years to come. The dam protects the habitat for trout above the dam and steelhead and salmon which migrate to reproduce below the dam.

Niles has a jewel today in the Dowagiac River, and this economy supporting asset will be lost for decades if the dam is removed.

Thank you for your consideration,  
David Koo

1834 N. Wolcott Ave.  
Chicago, IL 60622  
C: (312) 961-6333

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*The information in this email is confidential and intended solely for the attention and use of the named addressee(s). If you are not the intended recipient, please notify the sender immediately at (847) 739-3200. You are not authorized to and must not disclose, copy, distribute, or retain this message or any part of it.*



## **Marcy Hamilton**

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**From:** radiantpex@aol.com  
**Sent:** Thursday, April 28, 2016 4:03 PM  
**To:** Marcy Hamilton; mccaustin.2@nd.edu; rhuff@nilesmi.org; nan3738@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John\_DiCostanzo@comcast.net  
**Subject:** DOWAGIAC RIVER REMOVAL

To whom it may concern

I am going to keep this short and sweet.

The push to remove the Dowagiac Dam is wrong IMHO. As someone who regularly floats (boat) and fishes the waters below the seawall to the end of the park island (4 days a week) when the steelhead are in (July-May) your plan is going to destroy a very special section of river. This is much like the Pere Marquette river in Northern Michigan, very rare. The silt from the upper will change forever the gravel sections of the lower. Please see Dustan and Jakes comments below (Ripple Guide Service)

This plan, as you know, will disperse the steelhead and salmon over 150 more miles of streams in the Dowagiac watershed. The vast majority of these miles are inaccessible due to deep water, no stream access, and private property. This will virtually end the steelhead and salmon fishing on the Dowagiac River for many years to come.

Up to eight feet of sediment is trapped upstream of the dam and may cover vital spawning gravel when the dam is removed. This happened in a much smaller scale than what is now probable when the dam was opened in 1999, and the river is just now recovering from that disaster.

Removing the dam will also drastically impact the brown trout fishery above the dam. The dam acts as an upstream barrier for the predator fish that enter from the St. Joe. During the summer months, pike, walleye, and smallmouth enter the Dowagiac and feed on the brown trout below the dam. The only thing that keeps this from happening in the quality trout fishery above the dam is the barrier that the dam provides. If you want to see what will happen to the trout fishery above the dam, look at the trout fishing below the dam. Unfortunately, the trout fishing below the dam is very poor.

What we need to do is let the city and the planners of this disastrous plan know how we feel about the end of our fishery. Let them know that while you are here fishing that you stay at hotels in Niles, fill your gas tanks in Niles, and eat at restaurants in Niles. Let the businesses that you spend that money with know you won't be coming in anymore if there aren't fishable numbers of fish in the river.

If you enjoy fishing on the Dowagiac for migratory fish, your time to enjoy it is nearing an end unless we can get this dam removal stopped.

We who fish Pucker also had no idea you were having a final discussion meeting. Why was it not posted at Pucker/Losensky? Did you really want to hear from the people that actually use this area daily?

Please reconsider other options before destroying our beloved Dowagiac River.

CT Buck

## Marcy Hamilton

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**From:** Bryan Burroughs [bryanburroughs@michigantu.org]  
**Sent:** Thursday, April 28, 2016 5:21 PM  
**To:** Marcy Hamilton  
**Cc:** Ed Hoover  
**Subject:** Dowagiac River Dam Removal

Hello Marcy,

I hope all is well for you.

I received an email forward from a member, that identified you as the targeted recipient of public input for the Dowagiac River dam removal project.

I'm am writing to let you know, that Michigan Trout Unlimited, with 7,500 members in Michigan, including its member chapter the Kalamazoo Valley Chapter of Trout Unlimited (where this river is located), support the dam removal. We understand the tremendous number of miles of stream that will be connected due to this project, and its predicted benefits to the longterm health of the fish community found in it.

Please accept this email as a form of our support for the project. If you seek any additional detailed comments or clarifications, please do not hesitate to contact me personally. It would be my honor to discuss the project in detail. Ed Hoover, from our local chapter where this river is located, is copied on this email if you have need to contact him as well. Please inform us if any modifications to the dam removal plans occur that would significantly modify sediment management plans, or result in less than complete fish passage.

Thank you,

Bryan

Bryan Burroughs, Ph.D.  
Executive Director  
Michigan Trout Unlimited  
P.O. Box 442, Dewitt, MI 48820  
[www.michigantu.org](http://www.michigantu.org)  
517-599-5238



## Marcy Hamilton

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**From:** Ray laudano [rjlaudano@comcast.net]  
**Sent:** Thursday, April 28, 2016 6:28 PM  
**To:** Marcy Hamilton  
**Subject:** PROPOSED REMOVAL OF THE PUCKER STREET DAM

Dear Marcy Hamilton,

My name is Ray Laudano and I am a non-resident angler who has had the pleasure of enjoying the wonderful ecosystem of the Dowagiac River. I mention that I am a non-resident angler because of the time, energy, and funds that I invest in the surrounding communities while fishing the Dowagiac. It is a place I want to return to for many years to come and bring my many Trout Unlimited angler friends to its banks so they too, can experience the beauty of the Dowagiac.

My time on the Dowagiac has been spent with resident angler, guide, and I would go as far as to say 'Steward' of the Dowagiac, Jay Anglin. Jay has shown me the beauty and interconnectedness of life on the Dowagiac and I understand now that with the proposed removal of the Pucker Street dam, the Dowagiac may be in distress for quite some time in the future.

With the inevitability of the dam removal looming, I will quote Jay below because we both want the same things for the river and Jay has already stated it better than I could have done.

Thank you for your time to review this email.

Ray Laudano  
Gary Borger Trout Unlimited Chapter  
527 Lothair Drive  
Libertyville, IL. 60048

Mobile: 224 425 8664

### **Key Points Looking Forward**

- Minimize impact on the lower river with appropriate measures taken during sediment and dam removal upstream
- Identify problem areas downstream of the dam and implement projects to assure this section is capable of efficiently clearing the sedimentation that will take place during and after the project
- Organize volunteer, conservation organizations, state, federal and tribal resource for project work - form alliances
- Clear log jams that block the river upstream of the dam to allow recreational paddler and angler passage
- Acquire additional access sites upstream and work with and assist private landowners, offer access incentives (see MDNR Hunter Access Program, "HAP")
- Select high quality sections of river and implement stricter fishing regulations to encourage establishment of wild fish and improve the size and number of resident trout (no-brainer revenue stream for state and local community)
- Encourage river users to clean-up after themselves (see Kickapoo



River - Wisconsin cooperative effort)

-Encourage the public to contact/assist law-enforcement when illegal activity occurs at the various access sites

These are just a few of the thoughts that come to mind when I brainstorm the future of the Dowagiac River. There is much work to be done - LET'S DO THIS!

Sincerely,

Jay Anglin - Anglin Outdoors

574-210-2844

[jay@anglinoutdoors.com](mailto:jay@anglinoutdoors.com)

[www.anglinoutdoors.com](http://www.anglinoutdoors.com)

## Marcy Hamilton

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**From:** Roger Meyers [meyers.roger@gmail.com]  
**Sent:** Friday, April 29, 2016 9:57 AM  
**To:** Marcy Hamilton  
**Subject:** Dowagiac river dam

Sent from my iPhone

I enjoy fishing on the Dowagiac River for migratory fish, I hope your Committee reconsiders the removal of the dam on the Dowagiac River. When I go to the Dowagiac River to fish I also support the near by communities with purchases of gas, food and licenses for fishing.

Roger Meyers

## Marcy Hamilton

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**From:** Dan [dzambon@woh.rr.com]  
**Sent:** Friday, April 29, 2016 12:56 PM  
**To:** Marcy Hamilton  
**Cc:** 'Dan'; 'Eikerenkotters'  
**Subject:** Please do not remove the dam!

Hello,

As a long time fly fisherman, I have enjoyed many days fishing for steelhead and salmon on the Dowagiac River. Even though I live near Dayton, Ohio, it has always been well worth it to make the trip. For years, fishing buddies and I would make trips to fish the Dow, and still do.

It has been called to my attention that the city of Niles plans to remove the dam at Pucker Street. Please, reconsider this effort.

I think it will spread out the fish too thin, making fishing very poor - much like the Mad River is near me in Urbana, Ohio. I have been told it will disperse the fish approximately one hundred and fifty more miles, and that access will be more limited. This I would very much not like to see.

Please keep in mind I travel to your area because of the great fishing. I stay at local hotels and eat at local restaurants, again, because of the great fishing. If that fishing is gone, then so am I.

The bottom line is I am opposed to any effort that will negatively affect the quality of this fishery. Again, please reconsider removing the dam at Pucker Street.

Thank you for your consideration,  
Dan Zambon  
91 Grand Valley Drive  
Enon, OH 45323  
[dzambon@woh.rr.com](mailto:dzambon@woh.rr.com)



## **Marcy Hamilton**

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**From:** dustan harley [rippleguides@hotmail.com]  
**Sent:** Friday, April 29, 2016 6:18 PM  
**Subject:** Dowagiac River Dam Removal

To Whom It May Concern:

My name is Dustan Harley, and I own Ripple Guide Service. We are a fly fishing guide service that has operated on the St. Joe system including the Dowagiac River in Niles since 1999. We are privileged to guide people from all over the country on this unique fishery. This spring alone we have guided people from Connecticut, Indiana, Illinois, Ohio, Kentucky, Michigan, Wisconsin, Florida, Iowa, Arizona, and even a gentleman from England for three days. Most of these fishermen come to your city multiple times each year. In fact, we have one client who comes to fish the Dowagiac 15 times a year from Florida and brings friends in from all over the country each time! All of these folks visit your city for one reason - to catch fish! If the dam at Pucker Street is removed, it will spread the steelhead and salmon out over 40 times more river miles. This will make catching fish very difficult on the Dowagiac. The fish will be so spread out that finding them will be nearly impossible. What will this mean for our clients? They will still come to fish, but we will no longer have the Dowagiac as a viable option. This will mean that the hundreds of people that we bring into Niles each year will be staying at hotels in South Bend instead of Niles. They will be filling their gas tanks and eating at restaurants outside of Niles as well. These visiting fishermen will have no reason to come back to Niles because trying to catch fish in the Dowagiac will be an exercise in futility.

There has been talk about the Dowagiac bringing in busloads of people to kayak the river once the dam is removed. If you have ever been upstream of the dam, you know that just above Kinzie Road the river has been channelized. Not only has the river been channelized, but it is also filled with log jams that require numerous portages. The river banks are lined with dead ash trees because of the ash boring beetle. Every month these trees fall and are making more blockages to floating the river. Kayakers will not travel to Niles to float a dredged ditch with multiple portages. In order for people to float the river, there will need to be constant clearing of log jams to keep the river open for boaters. This will be an added cost that will need to be picked up by someone. There is a reason that in the last decade we have seen multiple canoe liveries go out of business on this river, and that reason is the upper river is too difficult for the recreational floater. People don't want to get stuck in log jams nor do they want to float a channelized river.

I just don't see an economic upside to this plan for the city of Niles. If repairs can be accomplished for \$1.3 million cost to the city and taking the dam out is going to cost the city \$2.1 million, where is the \$800,000 being made up? Keep the dam; save the money; keep fishermen spending money in your great city. Keep Niles as a destination for fishermen and the Dowagiac as a spotlight for your city.

Tight lines,

Dustan Harley  
Ripple Guide Service  
574-993-7453  
[www.rippleguides.com](http://www.rippleguides.com)

[Check us out on Facebook](#)

## **Marcy Hamilton**

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**From:** lransom1764@comcast.net  
**Sent:** Friday, April 29, 2016 6:45 PM  
**To:** Marcy Hamilton; mccausin.2@nd.edu; rhuff@nilesmi.org; GretchenCbutlergg@aol.com; nan3738@aol.com  
**Subject:** Pucker St. Dam

To Whom It May Concern:

I am writing to voice my objection to the removal of the damn at Pucker Street. My husband and I venture to Niles to fish and stay a few times a year. Our objective is fishing the Dowagiac River. Removal of the dam would greatly inhibit our ability to catch fish. If you forge ahead with removal plans, I guess we'll no longer be visiting your fine town as our main reason for staying, shopping, and eating in Niles is catching fish!

Sincerely,

Linda Ransom



The Dowagiac River in Southwest Michigan is currently being targeted for major changes. The Pucker Street Dam on the north side of the City of Niles is old, non-functional and a liability. It has been on the short list for removal for many years and the powers that be have decided they want the dam gone.

I have pondered this over the years and especially the past few weeks. There are a host of opinions on this matter, and while I agree with many friends and peers on certain aspects of removing this dam, I whole-heartedly disagree with some of their opinions as well. Whether you're an angler, recreational paddler, resident/landowner or, in my case, professional fishing guide, the opportunity to say your piece on this matter is quickly coming to a close. Comments must be received by Thursday, April 28th, email Marcy Hamilton [colcloughm@swmpc.org](mailto:colcloughm@swmpc.org). [Click Here](#) to read the official proposal. Read my comments below.

While many of you are well aware of the unique background of the Dowagiac River and Pucker Street Dam, some are not. I think it's important to cover some basic history and, in the process, explain to some degree, the reasoning for my decision on this matter. My opinion is based on a scientific perspective honed by over twenty years of guiding on the Dowagiac. Brevity has never been my strong suit and, in this case, being succinct is hardly advisable. While I encourage you to read my detailed comments, if you'd prefer not to, simply skip below to "The Bottom Line".

Here goes...

*Historically, the Pucker Street Dam held back sediment that had accumulated over the course of many decades in the small impoundment upstream. Sixteen years ago the gates that controlled the river's flow were unceremoniously opened and the impoundment was quickly drained. The consequence of this was one of the most horrifying things I've ever encountered as a conservationist and an angler: Much of the loose silt and sand held back by the dam migrated into the lower Dowagiac, covering the riverbed with several feet of muck. I will never forget standing on the bank and witnessing the catastrophic result. My eyes welled with tears as I took full stock of the "new" Dowagiac.*

*For months, a slurry of sediment and water slowly worked its way down to the St Joseph River. Inevitably, the Dowagiac cleared, but for years afterward periodic use of a "dragline" to remove sediment immediately above the dam would turn the water the color of mud in a matter of minutes. Eventually, after several years, the*

*stream stabilized to some degree and began the lengthy process of finding its new identity.*

*As the Dowagiac healed, cold-water species such as resident brown trout, as well as migratory steelhead and salmon, responded well and began to spawn in the gravelly stretches within the three miles or so of river they could access below the dam. It wasn't long before wild trout, salmon and steelhead parr filled the quiet, woody edges of the stream in the new "rearing habitat" created as trees collapsed into the river - their roots scoured by unremitting "run of the river" flows. I would often update Michigan DNR biologists with my observations, which were by and large positive.*

*These species are not native to the Dowagiac watershed, and while "browns" were originally stocked in the late 1800's, steelhead and salmon did not gain access to this stream until the late 1980's, when fish-ladders that allow fish passage were installed on the Buchanan and Berrien Springs dams (interestingly, fish and wildlife personnel claim that Brook Trout are not native to the Dowagiac watershed either though I question this assessment). All of these species currently exist within the watershed to some degree, including an abundance of naturally-reproduced, wild fish.*

*Currently, the lower-river is far from "sediment starved", as has been claimed by officials in the past who have spent virtually zero time on the stream prior, or for that matter, after the dam gates were opened. In fact, this statement could not be further from the truth. The shifting bedload coupled with dozens of fallen mature hardwood trees that litter the river in every stretch confirm that this remarkable fishery is in a constant state of flux. While the general character of the stream remains intact, the best holes and runs typically morph into something entirely different every year or so.*

*The past six months, I have noticed the lower river show signs of excessive sedimentation once again. While muck and topsoil tends to come from ditch dredging and agricultural activity upstream, the bulk of sand appears to be coming from directly above the dam where it has remained latent for nearly a century. The large "sediment trap" that was excavated after the dam gates were opened has filled and, yet again, the lower river is guzzling down heavy doses of sediment that moves past the dam. This is a huge problem that will only get worse. Regardless of what is done to prevent this issue, there will always be additional sediment entering the system.*



*There are three primary options have been proposed for this dam: 1) Remove the dam and sediment upstream and allow the river to flow unimpeded in hopes that it will eventually find an appropriate balance more true to its original character, 2) Repair the dam (and ideally dredge a new sediment trap immediately upstream which would require periodic cleaning), or, 3) Take no action at all.*

*An incredible amount of sediment is said to be present within the old impoundment section of the river - an area roughly a mile long and much wider than the actual river channel. It is imperative that this sediment is removed if the dam is razed. While dam removal is expensive, dealing with the sediment immediately upstream will require a lot more money and, of course, wreak havoc on the lower river once the buckets start digging.*

*Why is sediment removal so important? Besides aesthetics and filthy drift boats, sediment choked streams are not terribly productive from a cold-water fisheries standpoint, as the building blocks of the food chain such as aquatic insects and baitfish (including juvenile trout and salmon) are relegated to low-density status when insect habitat is smothered and spawning "redds" full of eggs are filled-in and suffocated. Furthermore, river temperatures tend to increase on average as "turbidity", ie suspended sediment in the water, reduces clarity and absorbs solar heat, often elevating summertime water temperatures into the lethal range for cold-water species.*

*When the Dowagiac runs clean and clear during summer months, it is not unusual for the water temperature to be cooler than the more notable trout streams such as the Manistee and Au Sable in Northern Michigan, as well as other famous trout streams throughout the US. This is true even during stifling hot weather, which is remarkable considering the watershed's latitude and general terrain. This is indicative of a significant and constant influx of cool groundwater, which provides a livable environ for resident brown and brook trout, as well as migratory salmonids from Lake Michigan that find their way into the Dowagiac via the St Joseph River.*

*Removing the Pucker Street Dam will likely solve many of the river's problems, but there are a host of other questions associated with a project of this magnitude. Fish regularly concentrate immediately below dams, which often supports excellent angling opportunities (as well as illegal angling activity such as snagging), but dams also act as a barrier for migratory fish species. These "non-resident" fish tend to be larger and produce plentiful offspring. Theoretically, they compete with or even feed on resident trout and forage minnow species upstream.*

*While migratory trout and salmon will likely move into the far reaches of the upper watershed after the dam is removed, there is also potential for predatory species such as walleye and smallmouth bass to venture into areas that currently support a healthy resident trout population.*

*Many anglers that enjoy fishing for resident trout upstream are less than pleased with the prospect of steelhead, salmon and warm-water predatory species holding and spawning in the upper reaches of the watershed, which includes several tributaries. There is a belief that these fish will destroy the trout fishing that now exists directly through predation and competition, as well as indirectly through angling pressure.*

*I believe the impact these large fish have on the trout fishery is largely exaggerated. The fact is, with good spawning habitat prevalent in many sections of the Dowagiac and its tributaries, natural reproduction is bound to boost biomass and provide a nearly unending protein source for resident species to feed upon. This includes salmon and steelhead eggs, parr and even the flesh of dead adult salmon.*

*Keep in mind, while stream-bound spawning salmon may instinctively take a fly or lure, they are not capable of real feeding at the end of their life-cycle, so they will not actively prey on resident species. Furthermore, the vast majority of feeding done by stream-bound steelhead is on insects and fish eggs. While the overall population of resident fish may or may not drop, clearly the size of resident browns will increase as their largely insect based diet is boosted with the aforementioned buffet of high-protein forage.*

*It should be noted that while steelhead fingerlings and smolts do compete with resident trout to some degree, juvenile steelhead (rainbow trout) and salmon tend to be associated with fast riffles. To the contrary, resident brown trout typically concentrate in slower, deeper sections characterized by woody cover and undercut banks - further reducing the overall impact of migratory species on resident trout.*

*Sadly, only an infinitesimal amount of public access exists upstream of the dam within the roughly 160 miles of watershed. This will relegate fishing activity to landowners and a handful of privileged anglers who have access to these private stretches of water unless more access is opened up. This is, and always has been one of my big hang-ups with removing this dam. An undertaking of this magnitude and expense should offer more benefit to the public, plain and simple.*



*Directly downstream of Losensky Park and Pucker Street Dam, both banks of the lower Dowagiac are private and angler trespassing is a huge issue. This is why savvy anglers and guides use watercraft to access the river and target fish downstream. Unfortunately, the upper-river is not easily drifted with larger watercraft and frankly there is not feasible access for anything that requires trailering such as a drift boat or large raft. Floating the upper stretches requires portaging around massive log jams and is typically done with canoes and kayaks.*

*Future acquisition of upstream river access and clearing log-jams should be considered a mandatory aspect of dam removal. In addition, it is highly advisable to establish stricter fishing regulations that will encourage the rapid establishment of a naturally reproduced, wild fish-based fishery, as well as enhance the quality of the fishery with a net increase of desirable trophy-sized resident trout.*

*While in the past I believed that once the dam was removed very few fish would remain in the lower river to provide angling opportunities, admittedly, I have largely changed my thinking on this matter. While there will surely be a huge number of migratory fish that move directly upstream without pausing to take a look at the scenery, I feel that many fish will still hold in the lower river. It's clear that plenty of steelhead never see the dam now, so whether it exists or not is a non-issue for a reasonable percentage of returning adult steelhead and salmon. It is safe to assume that post-dam-removal-natural-reproduction will increase dramatically, and though "recruitment" always varies when dealing with dammed rivers such as the St Joe, the number of wild fish that return to the Dowagiac as adults is surely to increase within a few years of dam removal.*

*The local and state economic impact of the current lower river fishery is often touted and certainly should not be ignored. Migratory fish often draw anglers from out of town including adjacent states, and myself, as well as other guides, host anglers from around the world who enjoy the excellent fishery that exists below the dam. The lower Dowagiac River is typically bustling with activity during peak migratory fish runs, and the summer months see an ever-increasing number of recreational paddlers and tubers using the river as well.*

*The impact these activities have is not simply economic; recreational usage is clearly evident as the river banks are well worn from foot traffic and often covered with garbage. Over the years I have personally removed a ridiculous number of garbage bags full of refuse, only to see an entirely new batch appear virtually overnight.*

*The Bottom Line:* When I ask myself what the best option is for the Dowagiac River, I try to examine the issue with an open mind. I have always preferred to ignore my occupation and form opinions based on science, conservation and common sense, then hopefully arrive at a reasonable and ethical place. In this case, I have not been enamored with some of the rhetoric that has been coming from both sides of the issue, but I believe in the will of the people to do the right thing.

Comparisons to similar streams is inevitable, but hardly quantitative, as each river possesses its very own set of circumstances. I tend to err on the side of caution, but it's hard for me to deny the ultimate outcome of dam removal that, theoretically, will alleviate many of the issues that currently hang over the Dowagiac like a cloud of toxic smoke. As a guide, I know it is highly likely that any heavy project activity will result in unfishable conditions downstream. Essentially, myself and other guides will be out of business for an undetermined amount of time as far the Dowagiac is concerned. Furthermore, recreational anglers who enjoy fishing the stretch of water below Pucker Street dam are sure to find another place to fish for a while. In a nutshell, everybody will take their money elsewhere.

Lost in this discourse, to some degree, is the general lack of concern for the lower river. This is no time to throw the baby out with the bathwater. The lower Dowagiac is like an old friend that will soon be in need. Those of us who cherish so many great memories this stream has given us would be fools not to do everything in our power to assure that future generations may one day also swing a fly through its deep tail-outs and feel the exhilaration of a throbbing steelhead at the end of the line. We owe this stream everything, and frankly, it doesn't owe us a damn thing.

A couple weeks ago, I sat and stared at the decrepit dam like I had never done before. For whatever reason, in all the years of parking my truck right next to it, I'd never really given it a thorough look. It's in rough shape. It stands as an epitaph to man's seemingly inexhaustible desire to harness the earth's resources - regardless of how insignificant they are in the big scheme of things. What once was considered progress is now a deteriorating eyesore - a relic from a time when it made sense.

I have spent many sleepless nights wondering how my livelihood will be impacted if this dam disappears from the face of our planet. Considering that for nearly half of my life I have guided anglers on the Dowagiac River, it should be easy to understand why.



My thoughts are simple, I believe it is time to do the right thing and stop squabbling over whether or not to remove this dam. I feel that it is inevitable and, instead of looking back, I have chosen to look forward and dedicate my resources and my knowledge to the effort. I want to make sure this project is done right and, in particular, that the lower river is given a new lease on life as well. There are many projects that can be done concurrent with dam removal that will minimize the overall impact on the fishery. Ideally, the heavy lifting will all take place in the least amount of time so one day in the near future we can all look back and say it was well worth our time, money and effort.

The time has come to join forces and attack this as a team.

### **Key Points Looking Forward**

- Minimize impact on the lower river with appropriate measures taken during sediment and dam removal upstream
- Identify problem areas downstream of the dam and implement projects to assure this section is capable of efficiently clearing the sedimentation that will take place during and after the project
- Organize volunteer, conservation organizations, state, federal and tribal resource for project work - form alliances
- Clear log jams that block the river upstream of the dam to allow recreational paddler and angler passage
- Acquire additional access sites upstream and work with and assist private landowners, offer access incentives (see MDNR Hunter Access Program, "HAP")
- Select high quality sections of river and implement stricter fishing regulations to encourage establishment of wild fish and improve the size and number of resident trout (no-brainer revenue stream for state and local community)
- Encourage river users to clean-up after themselves (see Kickapoo River - Wisconsin cooperative effort)
- Encourage the public to contact/assist law-enforcement when illegal activity occurs at the various access sites

These are just a few of the thoughts that come to mind when I brainstorm the future of the Dowagiac River. There is much work to be done - LET'S DO THIS!

Sincerely,

Jay Anglin

*Disease and Surgery  
of the eye*

*Small Incision Cataract  
Surgery*

*Refractive Surgery*

*Glaucoma Evaluation  
and Surgery*

April 20, 2016

Southwest Michigan Planning Commission  
376 W Main St., Suite 130  
Benton Harbor, MI 49022

Dear Commission:

I have been made aware that the City of Niles is planning to remove the dam at Progress Street.

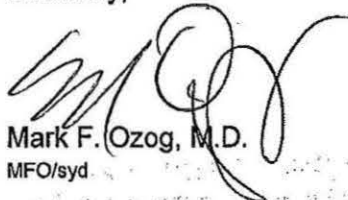
As you may or may not know, this dam allows a development of a destination for steelhead and salmon fishery on the Dowagiac River.

I have traveled from Great Falls, Montana, to the Dowagiac River to fish on multiple occasions for destination fly fishing. If the dam is removed, it would have a detrimental effect on the salmon fishery. Also, removal of the dam would also affect the brown trout fishery above the dam. MX is an upstream barrier for the predator fish that enter the St. Joseph's river. If the dam is removed, the trout fishery will basically die above the dam.

I need you to know that I travel to Niles for fishing. I stay at hotels in the area, I buy food and supplies in Niles. I hire local guides to take me fishing. If the fisheries are damaged or destroyed, I will not return to Niles Michigan. Likewise, other fishermen, like myself, will no longer have a reason to return to the area. This will negatively affect the business economics in Niles and the surrounding area.

Therefore, I am asking that you reconsider your plans and rather formulate plans that keep the fisheries of steelhead, salmon and trout in place. Potentially, you are tarnishing a gem of a tourist industry with potential poor reputations and economic hardships for your community and the surrounding area.

Sincerely,



Mark F. Ozog, M.D.  
MFO/syd

**Mark F. Ozog, M.D.**

Board Certified  
Ophthalmology

1417 9th Street South #100  
Great Falls, Montana 59405

Phone (406) 453-1613 • 1-800-541-2417 • Fax: (406) 453-3717  
Email: ozogeye@imt.net • Web: www.ozogeye.com





**PUCKER STREET DAM REMOVAL**  
**PROPOSED CONCEPT PLAN**  
**COMMENT CARD**



Thank you for your interest in the Pucker Street Dam Removal project. The proposed plan is intended to represent concepts in restoring the river habitats and resources that were altered and over time have degraded since the dam was constructed, thus becoming a more natural, free-flowing river.

After reviewing the proposed plan for the Pucker Street Dam Removal project, please give us your comments below.

Please **PRINT** the following information:

Name: Rod Snow  
Address: 403 Meade St.  
City/State/Zip: Niles MI 49120  
Phone: (269) 683-5048  
E-mail: rodsnow4@comcast.net

What aspects do you **like** about the proposed plan?

Making the river Healthy & Clean

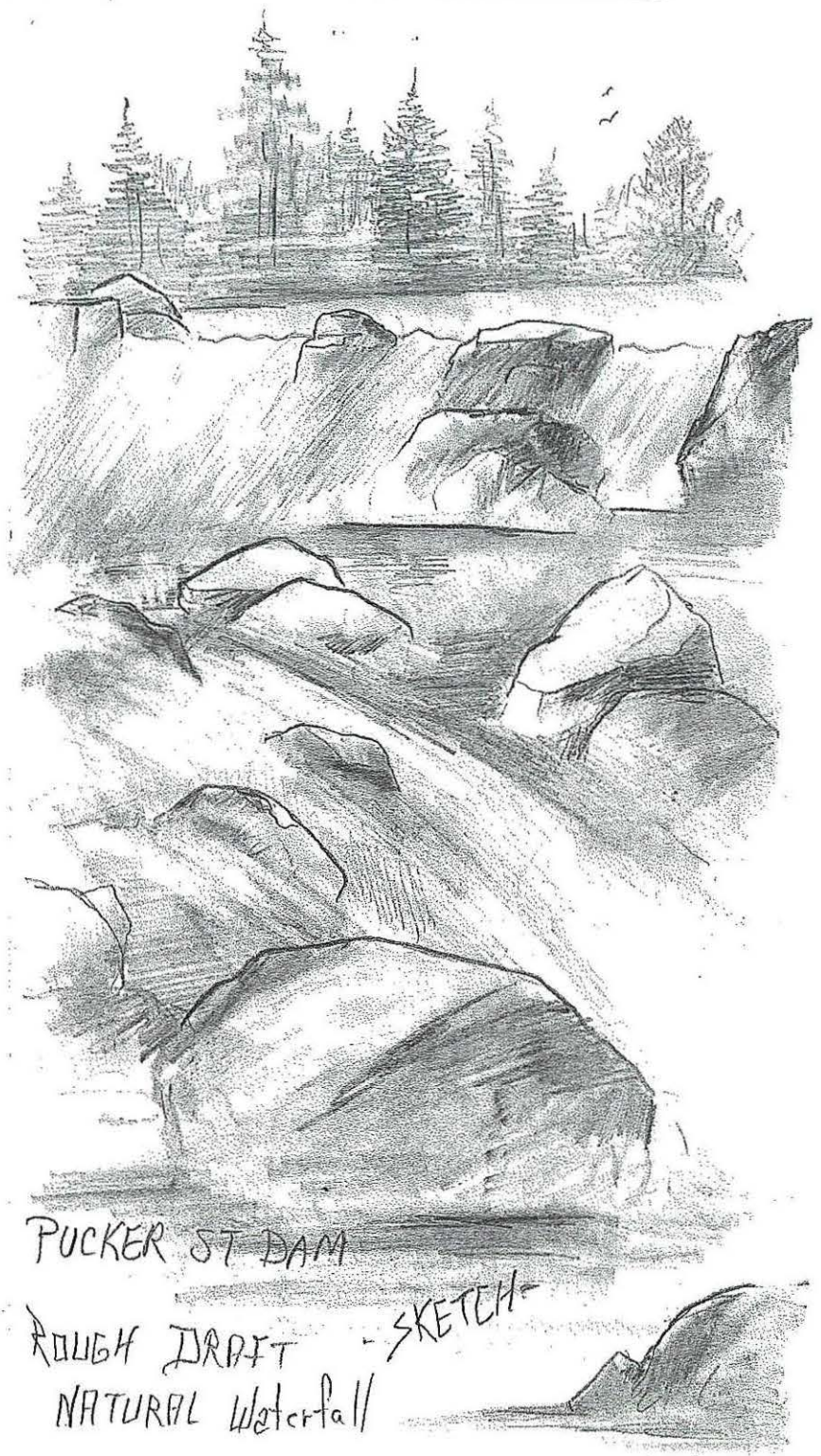
What are aspects you **do not like** about the proposed plan?

It might have the possibility to make the river even more narrow - Last draw down caused much water to leave, I lost a small lake (backwater that looked like a small lake) ☹

Other comments you would like to share?

Attached - Option #4 back fill dam with Rock & create a natural water fall

**THANK YOU FOR YOUR INPUT AND PARTICIPATION!**



PUCKER ST DAM

ROUGH DRAFT - SKETCH -

NATURAL Waterfall



4/24/16

Hi Marcy -

I attended the meeting April 14<sup>th</sup> about the DAM - You lead the meeting - GOOD JOB! ☺

Asked people to send you ideas - I am!

I suggested filling in with Rock/cement chunks behind DAM to create a waterfall - maybe 3 tier - Enclosed is a quick sketch I did - Just to be able to see the vision -

Here is what I see as a positive

- 1) Creates Beauty
- 2) the old dam will be stable with the backfill -
- 3) Save the City much \$
- 4) Creates a natural fish ladder
- 5) Filters the water with Oxygen

The negative I see is -

- 1) Still will hold back silt

may still have to dredge (sp?)  
now & then -

"JUST AN IDEA!" "HAVE a good DAY!" Rod

**Marcy Hamilton**

---

**From:** Eikerenkotters [theeik@att.net]  
**Sent:** Saturday, April 23, 2016 8:56 PM  
**To:** Marcy Hamilton  
**Subject:** Removal of Pucker Street Dam - Niles, Michigan

Southwest Michigan Planning Commission,

I am very concerned. I have recently heard of a plan to remove the city owned Pucker Street dam on the Dowagiac River. While I have long been a proponent of removing unneeded dams on rivers in the west to promote salmon & steelhead migration – I believe removal of this dam could damage more than one current quality fishery. I have been fishing the Dowagiac for about 15 years and currently come up from southern Ohio twice a year to fish the river for salmon or steelhead using a local guide and spending my tourist dollars in local establishments. By the way – I do all catch and release – it is all in the sport.

Removal of the dam will cause an immediate effect of destroying the quality spawning gravel beds and deep holes below the dam. Because of its lower flow and gradient, it will take years for the river to re-establish itself in this area. Dam removal will of course allow the salmon and steelhead to move on upstream and spread out along the remainder of the watershed. The size of the runs in the Dowagiac are not sufficient to support this as it will simply spread a dwindling run over a larger area reducing the chances of catching a fish by the sportsman. In addition, removing the dam will also drastically impact the brown trout fishery above the dam. The dam currently acts as an upstream barrier for the predator fish that enter from the St. Joseph River. During the summer months, pike, walleye, and smallmouth enter the Dowagiac and feed on the brown trout below the dam. The only thing that keeps this from happening in the quality trout fishery above the dam is the barrier that the dam provides. If you want to see what will happen to the trout fishery above the dam, just look at the trout fishing below the dam – it is unfortunately very poor.

The dam should not be removed without a plan to remove the sediment above it prior to removal, then replacing it with a small coffer dam or other barrier that will preclude upstream migration (even during periods of high water) of salmon and steelhead and the dreaded pike and walleye that are sure to destroy the fishery above the existing dam. I personally want to continue to enjoy the lower Dowagiac for many years as a salmon and steelhead fishery.

Tom Eikerenkotter,

Beavercreek, Ohio





**PUCKER STREET DAM REMOVAL**  
**PROPOSED CONCEPT PLAN**  
**COMMENT CARD**



Thank you for your interest in the Pucker Street Dam Removal project. The proposed plan is intended to represent concepts in restoring the river habitats and resources that were altered and over time have degraded since the dam was constructed, thus becoming a more natural, free-flowing river.

After reviewing the proposed plan for the Pucker Street Dam Removal project, please give us your comments below.

Please **PRINT** the following information:

Name: Paul Schimmel

Address: 2918 N 5<sup>TH</sup> ST

City/State/Zip: Niles Mich

Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

What aspects do you like about the proposed plan?

How FAR BACK will you go for  
RESTORATION (YEARS)

What are aspects you do not like about the proposed plan?

Other comments you would like to share?

COME WALK MY  
BANK

**THANK YOU FOR YOUR INPUT AND PARTICIPATION!**

## Marcy Hamilton

---

**From:** littlelooie@comcast.net  
**Sent:** Thursday, April 14, 2016 9:33 PM  
**To:** Marcy Hamilton  
**Subject:** Tonight's presentation...

...was gr8...I must confess to ending up paying less attention to content and more focus on rooting for you as you navigated through the collection of self interested folks in the audience! You were fab!

how can I catch up with you to learn more?

Pete

the guy with the floppy hat talking with you and colleagues after the presentation about the benefit of having DNR and their passion more visible.



## **Marcy Hamilton**

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**From:** Martin Goodman [1martingoodman@gmail.com]  
**Sent:** Wednesday, April 20, 2016 6:15 PM  
**To:** Marcy Hamilton  
**Subject:** Dam removal

Please do not remove the dam. The impact will have serious repercussions on fishing and fisherman coming to your city and the money spent locally.  
Thank you.

Sent from my iPhone

## **Marcy Hamilton**

---

**From:** Niall McCarthy [niall.callahan@gmail.com]  
**Sent:** Saturday, April 16, 2016 10:18 AM  
**To:** Marcy Hamilton  
**Subject:** Pucker Street Dam

Dear Ms. Hamilton,

The removal of the pucker street dam would be economically beneficial to the area of Niles Michigan and the removal would be environmentally beneficial to the entire watershed.

I live in Chicago and travel to the river a number of times each year, I also fish other Michigan rivers like the Pere Marquette which has no dams and is very healthy river. Removal of the dam would make the river healthier and that would attract a large number of tourist dollars. The removal would also make residents downstream of the aging dam safer.

Sincerely,  
Niall McCarthy

## **Marcy Hamilton**

---

**From:** John Barnhart [jrbarnhart\_mi@comcast.net]  
**Sent:** Monday, April 18, 2016 9:58 PM  
**To:** Marcy Hamilton  
**Subject:** Pucker Street Dam Removal Comments

Dear Ms. Hamilton,

I have read with interest the comments by Mr. Harley reported in the South Bend Tribune regarding the impact on the anadromous fishery in the Dowagiac River and I believe his comments have merit in the short term.

However, the removal of the dam will make available long reaches of the river to spawning fish may result in major increases in natural reproduction in the Dowagiac River System and in the survival of the resulting fry and smolts.

Currently, steelhead reproduction is limited to the short reach of the river below the Pucker Street Dam where spawning fish are subject to intense fishing pressure and to the destruction or degradation of spawning redds by the large numbers of careless waders. Removing the dam will allow many fish to find appropriate spawning habitat that is not subject to the intense traffic of the lower river and should result in greater numbers of fry survival. From my own observations, I believe that some natural reproduction occurs in the lower river because I have seen and inadvertently caught steelhead parr in that section of the river. I think that it is likely that greater numbers of steelhead offspring will survive if more habitat is available that is not as pressured as the current habitat.

Consequently, I believe that, as Mr. Harley states, catch rates will decrease for at least the first three years after dam removal. However, as the number of surviving fish increase, I would expect the fishery to rebound and even improve as more fish hatch and mature to migrate to Lake Michigan and, ultimately, return to their natal water to spawn.

I believe the impact on the upstream fishery will not be as severe as some people claim. Currently, there is a fairly good brown trout fishery downstream of the dam and those fish are subject to predation from pike, walleye, and smallmouth bass that migrate up from the St. Joseph River.

The trout fishery upstream of the dam may see some decrease due to predation, but I believe it will be offset by an increase in the food supply provided by anadromous fish eggs, fry and parr and the decaying carcasses of spawned out salmon.

The full effects on the fishery will not be realized for several years until some equilibrium is reached. With careful management, the fishery has the potential to be an even greater asset to the community of southwest Michigan.

Furthermore, the dam is an eyesore, a liability, and a hazard.

Regardless of its affect on the fishery and short term fishing success, it is time to remove this blemish on a beautiful river and make some amends for the damage that earlier generations have bequeathed us.

John R. Barnhart  
24729 US 12 East  
Edwardsburg, MI  
Member St. Joseph River Fly Fishers & Trout Unlimited



## Marcy Hamilton

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**From:** jason tharp [jastharp@yahoo.com]  
**Sent:** Monday, April 18, 2016 1:47 PM  
**To:** Marcy Hamilton  
**Subject:** Pucker Street Dam Removal

Marcy

I have continued to look at the Pucker Street Dam removal in ways that include recreation within the current public lands at the dam. I'm looking at ways to work with the the current plans for dam removal. I see that finding a more natural design that fits with river restoration is important. I have looked at other dam removals in southern Michigan and have found several that show how this would work. These other rivers/dam removals include the Coldwater at Freeport, the Thornapple at Nashville, the Red Cedar at Willamston, and Mill Creek at Dexter. Dexter is a good example because it included dam removal, river restoration, public park space, paddling, and fishing as a cold water stream. All these are parts of the plan.

Here is a video of these sites. <https://www.youtube.com/watch?v=ibcCyvqjVns>

These examples show examples of how this would work. The natural gradient and flow of the Dowagiac would support this. These dam removals and designs were supported by the DNR, Fish&Wildlife, Trout Unlimited, and other conservation and river groups. I'm looking at doing the same things but calling it a whitewater park. These examples show how it would work and has worked for other dam removals.

How this fits with river restoration is the same as these other former dams. These structures placed into the stream have a function of sediment and erosion control. The use of the cross vain helps control and direct the flow. Using these same structures and principals would help control the same issues that will be present on the Dowagiac. M-51 was moved a few feet because of erosion to the bank. Doing something to protect that bank and the state highway above may open up another funding source.

Fishing is also important and heavily done at this location. With the taking out of the dam there will be an impact. Also the Dowagiac has a lot of private property along it and this is one of the public areas. Putting in structures will create habitat for fish and fishing. The eddie lines, fast water, and pools that are good for kayaking are good for fishing. Looking at Mill Creek in Dexter, Ann Arbor Trout Unlimited has made this creek into a trout stream and host a trout fest. Video link [https://www.youtube.com/watch?v=T7C\\_XRnt-2M](https://www.youtube.com/watch?v=T7C_XRnt-2M) Trying to keep fishing its best at this location is important. You don't want equate dam removal with destroying a fishing spot. The inclusion of rapids will make this spot something special to fish. I would also include a good drift boat launch at this location. They already do this but the current way is not the easiest or safest way of putting a boat in the water.

Funding is always an issue with any project. When I started looking at Pucker Street dam I was looking for a cheaper way to remove it. This is a way to fit with the current plans as an add on to the project. Just small changes within the current park that will fit with the dam removal. If funding can not be obtained for this part of the project it could easily be removed and the dam removed without it. I think there are ways to fund it as a add on to the dam removal. The recreational grant Dodd park got is an example of another funding source. I believe Niles would support this.

I do believe dam removal is important. There are many ways to remove a dam. Finding the best way that fit the river and conditions on the each river is important. Recreation is important on the Dowagiac and should be a consideration with dam removal.

Thanks for any consideration  
Jason Tharp

## **Marcy Hamilton**

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**From:** John F Trout III [jft trout@aep.com]  
**Sent:** Wednesday, April 20, 2016 9:06 AM  
**To:** Marcy Hamilton  
**Subject:** dowagiac

I understand there are plans to remove the dam. Just allow me to say that if this proves to destroy the fishing on the river, which most everyone agrees it will, then my tourist dollars won't be set aside for your area any longer.

I have had wonderful fishing trips on the Dowagiac and find it worth every penny I spent. I do hope everyone involved considers the dollars fishermen spend for quality fishing in your area. That money will be missed.

Sincerely,  
John Trout  
(Ohio Valley Fly Rod Club)



## **Marcy Hamilton**

---

**From:** Andy Dziengel [dziengel3@hotmail.com]  
**Sent:** Tuesday, April 19, 2016 10:07 PM  
**To:** Marcy Hamilton  
**Subject:** Niles dam

I am sending this in regards to the elimination of the Niles dam. My family and I spend a minimum of two weeks in the area in order to fish the Dowagiac river, which I find easily fishable with my family. We also enjoy the relative proximity to the Chicago area and South Bend.

It has come to my attention that once the dam is gone so with it will go the accessible steelhead fishing. If there are no steelhead then we will have to fish elsewhere and spend our money outside the Niles area. This is something that I would rather not do but without the easy access to fish we will go elsewhere.

In closing, please reconsider and keep the dam as is.

Sent from [Outlook Mobile](#)

## Marcy Hamilton

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**From:** Jon Romano [jromano@darwill.com]  
**Sent:** Tuesday, April 19, 2016 10:12 PM  
**To:** Marcy Hamilton  
**Subject:** Pucker street dam

Hi, my name is jon, I live in Chicago and I own a camper and have it year round at the campground in nils on the Dowagiac. We spend a lot of time up there fishing with family and friends and eat in nils quite often. We spend money at the grocery stores and many other local places.. If the fishing goes bad because of the dam removal, that would be terrible... Do you know how this removal will impact fishing for steelhead and trout?

Please advise - Very concerned

Jon Romano  
[jroma@darwill.com](mailto:jroma@darwill.com)  
708.236.4953

## **Marcy Hamilton**

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**From:** Steve Hawkins [hawkinsart@sbcglobal.net]  
**Sent:** Wednesday, April 20, 2016 10:16 AM  
**To:** Marcy Hamilton  
**Subject:** Dowagiac dam plans (continued)

Please reconsider the long term negative impacts of the demolition of the Pucker Street dam in Niles. The damage to the trout fishery and subsequent economic repercussions to many businesses in Niles and the surrounding areas from reduced tourism should be of utmost concern.

My fishing friends and I will not be returning to Niles if the Pucker Street dam is removed.

Respectfully,

Steve Hawkins



## Marcy Hamilton

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**From:** Dan Kuksa [dan@hthconsultants.com]  
**Sent:** Wednesday, April 20, 2016 11:22 AM  
**To:** Marcy Hamilton; mccauslin.2@nd.edu; rhuff@nilesmi.org; nan3738@aol.com; GretchenCbutlergg@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John\_DiCostanzo@comcast.net; dustan@rippleguides.com; Adam Marton; Brandon Dillard; Robert Tomes; jon@chifly.com; bbeckner313@gmail.com  
**Subject:** Dowagiac River Dam

Fellow Citizens,

It is with much distress that I have been informed of your plan to remove the dam located on the Dowagiac River. I have been traveling from the far northern suburbs of Chicago to fish for migratory steelhead and salmon for the past 13 seasons. I spend several river days each spring and fall to fish this incredible watershed and plan on continuing to do so...if the current ecosystem remains unchanged!

In addition I have brought many clients, friends, and associates along in order to enjoy the magic that has been the Dowagiac. These individuals have come with me from all over the country in order to experience a place almost unlike any other in the United States. Each trip we patronize the local businesses by eating at their restaurants, staying in their hotels, shopping at their stores, using their services, and buying their gas.

I know that **I am not** the only individual. I would bet the numbers reach into four digits that help cycle part of a local economy... all because of the presence of such a unique fishery. I am a "catch-and-release" angler who encourages the same practice for others, in order to do our part and help maintain the dynamic steelhead population which exists in the lower Dowagiac. The environmental impact of releasing some unknown quantity of metric tons of sediment downstream will do more to destroy a healthy population of species, plus their breeding grounds, than any fisherman ever could.

Sometimes a dam needs to go. But you are very, very wrong in this case. I can choose to fish anywhere in the midwest (or country for that matter). However, myself, along with thousands of others, have made a decision to support and preserve the Dowagiac watershed and its local economy. It would be highly unfortunate to have uninvolved legislators and decision makers be the parties responsible for the destruction of a thriving ecosystem.

Please consider my comments, and those of any other individual and/or organization, in your final decision. I thank you for the opportunity to express my deep concerns. I am confident that the feedback you receive will be sufficient grounds to reject the project.

Good Day.

--

**dan kuksa - business director**



**office 847.247.0200 / direct 847.247.8970**

This electronic mail transmission may contain confidential or privileged information. If you believe that you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

## Marcy Hamilton

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**From:** Adam Marton [adam@fieldworkersclub.com]  
**Sent:** Wednesday, April 20, 2016 6:21 PM  
**To:** Marcy Hamilton; mccauslin.2@nd.edu; rhuff@nilesmi.org; nan3738@aol.com; GretchenCbutlergg@aol.com; dvanden@qtm.net; domerdurm@hotmail.com; dmann@nilesmi.org; zmwrent@sbcglobal.net; wskalla@sbcglobal.net; John\_DiCostanzo@comcast.net  
**Subject:** Dowagiac River Damn Removal

Dear Southwest Michigan Planning Commission, Mayor Michael McCauslin and Niles City Counsel Members,

I am writing to share my opposition to the proposal to remove the Pucker Street Damn on the Dowagiac River. I feel this plan jeopardizes the quality of the recreational trout, salmon and steelhead fishing on the lower river below the damn. Should this fishery be destroyed by the removal of the damn myself and the hundreds (of maybe thousands) of other people who spend time in Niles will no longer come there to fish. This will also mean myself and the other fisherman will no longer utilize any of the business (hotels, gas stations, restaurants, taverns, markets and tackle shops) we have been come to depend on while we are in your community.

The Dowagiac River offers a very unique fishery for many reasons and should be considered as such by the group of decision makers who are considering making a change. Facts should be used to support any changes and it is my hope that complete economic, scientific, usage and environmental studies will be conducted to collect these facts and support any decisions.

Simple watershed comparisons, new utilization projections or economic guesses are in my opinion not adequate to support any change decisions at this time.

Just one of the facets that makes the Dowagiac so unique is it's draw for anglers from outside of the area. People travel great distances on a regular basis to fish on this river and as a result stay and patronize businesses on the community of Niles, Michigan. I have personally fished with friends from Texas, Wisconsin, Indiana and Illinois on this river. In all cases we overnighed in Niles, ate at the restaurants, purchased groceries, gas and tackle. Many of my friends regally come from Chicago, Milwaukee, Rockford, Peoria, Indianapolis and Ohio.

Lastly, I hope that this group of decision makers will consider all that is at stake should a change occur. Beyond everything I've mentioned above should that damn come out is this there a complete understanding of the true environmental impact this could have? Does the committee know what is in the years of silt and agricultural run-off buried behind the damn that will get dislodged and flow down stream into the St Joe, Lake Michigan and beyond?

Please do not take out the Pucker Street Damn.

Thank you for considering my opinions.

Adam Marton  
The Fieldworkers Club  
5985 Trail End Road  
Three Oaks, MI 49218  
[adam@fieldworkersclub.com](mailto:adam@fieldworkersclub.com)  
312-440-1200  
312-213-2324/mobile  
[www.fieldworkersclub.com](http://www.fieldworkersclub.com)



## Marcy Hamilton

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**From:** Richard Kasvin [rkasvin@Prints-Posters.com]  
**Sent:** Wednesday, April 20, 2016 6:58 PM  
**To:** Marcy Hamilton  
**Subject:** Dowagiac river Dam removal.

To whom this concerns, I have been told that the dam on the Dowagiac river, upstream from Niles, is in danger of being removed. I hope you reconsider this. We have been coming to the Dowagiac for 15 years, twice a year, fishing for the migratory steelhead. We stay at local hotels, eat at restaurants, and have even gone antique shopping in Niles on these trips. It would be a great loss to the area to see this come to an end. Also, a great Steelhead stream would be destroyed. I sincerely hope you and your council members reconsider this. I don't want to have to go steel heading further north in Michigan.

Thank You,  
Richard Kasvin  
Owner  
Chicago Center for The Print  
1509 W. Fullerton Ave.  
Chicago, IL 60614  
773-477-1585  
[www.prints-posters.com](http://www.prints-posters.com)  
[rkasvin@prints-posters.com](mailto:rkasvin@prints-posters.com)  
Gallery Hours  
Tues-Sat 11:30- 5:00, Sun 12- 5  
Charter Member  
International Vintage Poster Dealers Association

**To:** hamiltonm@swmpc.org  
**From:** Kory Boozer <koryboozer@icloud.com>  
**Subject:** Pucker Street Dam Removal  
**Date:** Tue, 25 Oct 2016 11:52:46 +0000 (GMT)

---

Hi Marcy,

My name is Kory Boozer, I am a native and resident of Berrien County, born and raised on the St. Joseph River in Berrien Springs and licensed fishing guide here in Southwest Michigan. I run more guided trips in Berrien County than any other guides hands down, but my main focus is on the St. Joseph River, not the Dowagiac River.

I was actually the one that with the direction of Jay Wesley, began creating a stir with the City of Niles to get them to begin thinking seriously about dam removal which has obviously lead to them finally doing so and the number of steps that you all have taken from there to get to where we are now.

For starters, I am not a biologist, I have a lot of knowledge on the matter but hold no degree. I have no dog in this fight other than wanting what is best for my local environment. Obviously anything non-natural is often times not great for the environment, in the case of Pucker Street Dam, I feel it is essentially holding the river hostage.

I was under the assumption that the dam removal process was moving forward as planned, but as of late have heard some mixed statements regarding this matter.

It seems to me, the movement is being stunted by the desires of a few anglers pocket books, on one side you have Dustan Harley and company wanting the dam or at least some sort of blockage to remain to keep fish bottled up in the lower river. On the other side you have anglers wanting the dam removed, but only if there is funding to do restoration work on the lower river once the dam is removed. Which is obviously not a bad idea, but I don't think it is as necessary as some are trying to portray it and seemingly holding the removal process up in doing so. The most disturbing fact of all this to me is, essentially none of these entities are actually locals and they all have something to gain by their ideology being utilized.

If that dam was removed as the plans that were made stated, within a year that lower river would be back to normal, the first and foremost goal should be getting the dam removed here, not complicating the process with a hundred other ideas.

As far as groups spearheading the project, MEANDRS should be the only group doing so, for a variety of reasons. This project should be based on bringing the watershed back to its natural environment with the focus on enhancing the watershed and environment for native species, groups like Trout Unlimited, etc... should not have an official affiliation with any of this. Trout are not native here and the project should not be complicated by considering such things, it should be black & white, this project is best for the local environment and native species that inhabit it. By keeping it that way, nobody can argue whether it is good or bad or anything else, our only goal here should be bringing the environment back to its most natural form. This also keeps all these guys wanting to make a name for themselves out of the picture and removes any bias. MEANDRS is also a locally based group, not some national deal that many many people have negative thoughts about, the fact is, fly fisherman are the minority and TU does not have a great reputation with non fly fisherman, keep in mind, I am a fly fishing guide. You keep it local and non-biased and all the BS goes out the window. Jay Anglin is a Friend of mine and has the best interest of the watershed in mind, but is also an extremely controversial entity, you will have folks disagree with the removal simply based on the fact he supports it, which is why it is very important to stick with this being a MEANDRS project as it

is without a doubt the most "middle of the road" entity we could pick to spearhead this and future enhancement projects. I heard rumors of a TU Chapter being created, etc... that would in my opinion, do more damage than good...

I would appreciate it if I could be kept in the loop and attend any meetings that there may be, many of the statements I have heard as of late I find very disturbing as I don't think many of these folks really have the best interest of the native environment at hand, more than anything I feel they simply want to make a name for themselves and that is not right at all.

Thank you for your time,  
Sincerely,

Kory W. Boozer

Cell: 269.235.0664

eMail: [info@boozersguideservice.com](mailto:info@boozersguideservice.com)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAY 03 2016

REPLY TO THE ATTENTION OF:

E-19J

Rick Westerhof  
U.S. Fish and Wildlife Service  
Midwest Region Office Fisheries  
6644 Turner Road  
Elmira, Michigan 49730

**RE: Scoping – Preparation of an Environmental Assessment for the Proposed Removal of the Existing Pucker Street Dam (aka Niles Dam) on the Dowagiac River; City of Niles, Berrien County, Michigan**

Dear Mr. Westerhof:

The U.S. Environmental Protection Agency (EPA) has recently learned of the U.S. Fish and Wildlife Service's (USFWS) proposal to prepare an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) for the proposed removal of the existing Pucker Street Dam (also known as the Niles Dam) located on the Dowagiac River (River) in Niles, Michigan. EPA has reviewed early project information provided by USFWS on the proposed project, including the Draft Design Report (dated April 7, 2016), and other project specifications provided via email to EPA by USFWS on April 19, 2016. This letter provides EPA's scoping comments, pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The proposed project site on the Dowagiac River is approximately three miles upstream of its confluence with the St. Joseph River. The existing concrete Pucker Street Dam, wingwalls, and powerhouse were built in 1928. The site has not produced power in many years due to maintenance costs, sedimentation in the upstream impoundment, and damaged turbines. Before the construction of the current Dam, a log dam was built just upstream of the existing structure in 1828 and was in place for many years.

The Dowagiac River runs along a former glacial lake bed, and the river bed and much of the watershed is made up of coarse glacial material, which is responsible for storing tremendous volumes of cold groundwater. This cold groundwater comprises the River's baseflow, and also sustains floodplain wetlands and ground-water fed wetland seeps adjacent to the River.

The project was initiated because of structural issues that have created safety concerns both at the Dam and downstream, leading to initial investigations into its removal. In 1996, the City of Niles (City) announced the generators were no longer operational due to major damage to the turbines from silt and sand. At that time, the City decided that the best option was to create run of the river flow. An initial drawdown and passive sediment release occurred at the Dam in May of 1999, when three of the five existing sluice gates were permanently opened. Water levels dropped five feet and hundreds of thousands of cubic yards of sediment were released into the River downstream of the Dam. Because the 1999 drawdown produced such a significant sediment release, and because of fishery, recreational, and infrastructure considerations downstream, active sediment management is desired for the Pucker Street Dam project.

In addition to safety concerns, the Dam also impedes fish migration within the River, blocking almost the entire River watershed and its tributaries (159 miles of mainstem and tributary habitat) to fish passage from the St. Joseph River and Lake Michigan. Removing the existing Dam would eliminate that barrier and allow for restoration of two miles of high-gradient cold water aquatic habitat, which is a rare resource in this region. The project area includes approximately 11,000 feet of river upstream of the Dam and 300' downstream of the Dam.

Information presented by USFWS at a public meeting held April 14, 2016 included discussion of proposed activities at the project location, which include the removal of the Dam and associated structures; filling of the existing raceway channel west of the Dam; active sediment management to excavate hundreds of thousands of cubic yards of sediments that have been trapped behind the Dam for decades; and stabilization of the existing Pucker Street bridge over the River. The project would also entail large amounts of earthwork and grading to slope the banks of the riverbank upstream of the Dam post-removal, as well as the potential for construction of associated access roads and staging areas for project implementation. Removal of the Dam is expected to drop the upstream river pool elevation by several feet, and further drops may be expected during summer months.

To help USFWS prepare going forward, EPA would like to emphasize the role and importance of the statement of purpose and need that will be required in forthcoming NEPA documentation for this project. The purpose and need statement should be specific enough that the range of alternatives can be evaluated in terms of how well they address purpose and need, but not so narrow that they pre-select a single alternative. Furthermore, a project's purpose and need must justify the impacts associated with a Proposed Project. EPA is aware that specific construction plans have been drawn up and that specific project elements (e.g., removal of the Dam, construction of a 20' floodplain bench in river reaches upstream of the Dam, etc.) have been communicated to the public and described in the Draft Design Report; this occurred before the NEPA process was conducted. At this point, USFWS appears to have skipped the important step of developing a range of alternatives (including a No Build alternative) to meet a specific project purpose and need. All reasonable alternatives should be identified and studied, regardless of whether or not they are within the jurisdiction of the lead Federal agency.



Based on the limited information provided, EPA offers the following comments for consideration when preparing the EA for the proposed project.

### **PURPOSE AND NEED / PROJECT ALTERNATIVES**

Several project goals were identified on page 3 of the Draft Design Report. The forthcoming EA should identify and substantiate both the purpose of the project, and the need(s) for the proposed project, and identify the preferred alternative. The project purpose and the project need statements for the proposed action should be clear and concise for reviewers of the EA. After underlying problems have been identified and substantiated, the alternatives identified to solve the underlying problems should then be identified and explained. The no-action alternative and all action alternatives that would satisfy the substantiated purpose and need should be fully assessed in the EA. The EA should identify any alternatives considered but dismissed from further consideration (if applicable), and should provide elimination criteria and clear explanations for their early elimination.

### **CUMULATIVE IMPACTS**

When analyzing the proposed project and alternatives, USFWS must consider actions that result as a direct or indirect consequence - that is, connected, similar, and cumulative actions.<sup>1</sup> Specifically, this would include indirect impacts to upstream wetlands. These connected, similar, and cumulative actions should be incorporated into the description of each alternative, and impacts assessed accordingly. Connected actions are those that are "closely related" to the proposal and alternatives. Connected actions automatically trigger other actions, they cannot or will not proceed unless other actions have been taken previously or simultaneously, or they are interdependent parts of a larger action and depend on the larger action for their justification. Specifically related to this project are the proposed reburial of two TransCanada natural gas pipelines (24" and a 22") that will be exposed post-restoration and the removal or plugging of an existing abandoned water line located 250 feet downstream of the Dam; work involving these pipelines would also be considered a connected action and should be analyzed under NEPA.

### **PROJECT DESCRIPTION AND DESIGN**

Once the NEPA process has been completed and a preferred alternative selected, that alternative will need to be reflected in updated project plans. That preferred alternative will also require regulatory Federal Clean Water Act and state permits through MDEQ. EPA recommends that the forthcoming EA include the following:

- Describe how long the current Dam has been in place, information on location and type of prior (legacy) dams, the type of existing dam and its current condition, and the material of which it is constructed.
- The EA should discuss the potential for erosion due to project implementation. In particular, the EA should discuss if or how Dam removal will increase the possibility of bank scour or in-stream erosion. The EA should also discuss, for each alternative, whether bank erosion control or in-stream grade control measures are necessary and proposed, and if yes, where are they proposed and how were they designed.

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<sup>1</sup> 40 CFR 1508.25



- The EA should provide information pertaining to construction access and how work will be done (e.g., construction staging from the river bank vs. in-stream river work). If cofferdams or other temporary dewatering measures are proposed, those measures, their impacts, and the lengths of time they will be installed, should be discussed.
- The EA should describe information on proposed construction sequencing, including the proposed timeline for this project and the specific proposed steps to accomplish the project.
- Discuss how USFWS plans to deal with non-sediment components if the Dam and appurtenant structures are removed. Include a discussion on where materials from concrete caps, paved roads, and abutments will be disposed.
- The EA should include a determination as to whether a legacy dam exists and whether the removal of a legacy dam will need to be incorporated into any of the action alternatives that propose removal of the Pucker St. Dam. When a new dam is constructed in the same or close location to an original dam (as this dam was reconstructed multiple times), it was historically common to submerge or built to submerge the older dam (or its remnants). A submerged older dam is referred to as a legacy dam. The need for removal of an upstream legacy dam as part of a downstream dam removal project is fairly common in the field of dam removal.

### **WATER QUALITY**

The Dowagiac River is listed as impaired (i.e., not meeting water quality standards) on the MDEQ Clean Water Act Section 303(d) list of impaired waterbodies. The forthcoming EA should discuss existing water quality issues, the existing impairments, and how the proposed project may affect water quality in the Dowagiac River. Additionally, the EA should discuss expected effects of dam removal (both positive and negative) on water quality in the Dowagiac River. Specifically, the EA should discuss how the project will contribute to the overall water quality of the river.

### **WETLANDS**

It is unclear if a wetland delineation has been completed or is planned to be completed. The EA should include a wetland delineation and robust analysis of wetland impacts associated with all project alternatives. Wetlands appear to be present adjacent to and in the vicinity of the Pucker Street Dam. Due to the groundwater-fed system, some of these wetlands may be high-quality groundwater seeps or fens. Project design and the alternatives analysis should incorporate a wetland delineation to ensure wetlands in the project vicinity are located and that wetland impacts are avoided, unavoidable impacts are minimized, and mitigation is provided for unavoidable, minimized impacts (as per the Clean Water Act Section 404(b)(1) guidelines).

Specifically, EPA recommends that a formal wetland delineation be undertaken to determine the potential for wetlands in all access/staging/clearing areas, and in areas of/adjacent to the river pool upstream that could be affected by Dam removal. An action alternative that involves either direct or indirect impacts to wetlands would not be "self-mitigating." Direct impacts to wetlands would be due to the placement of dredged or fill material. Indirect wetland impacts are attributed primarily to the loss of wetland hydrology associated with the drop in water level following Dam removal. In addition to wetland fill, the loss of (via indirect impacts to) wetlands, is of concern to EPA. Many wetland functions and values will be lost if existing



wetlands revert to upland areas. While there is the potential for the development of new wetlands in areas currently inundated by areas of river channel, there is substantial uncertainty as to the quality, location, and acreage of wetlands that may actually develop post-Dam removal. Furthermore, the 1999 drawdown likely contributed to more wetland creation than the proposed project will, as that drawdown took the upstream reach from an impoundment to a channel.

Forthcoming NEPA documentation should include specific narrative information on proposed mitigation for direct wetland impacts. Additionally, EPA recommends that USFWS continue to work with MDEQ and/or EPA to develop an acceptable mitigation ratio and mitigation plan to compensate for indirect wetland impacts that meets requirements of the 2008 USACE Mitigation rule (40 CFR 230). Details on mitigation for indirect wetland impacts (including mitigation ratios, mitigation type, mitigation location(s), etc.), should be included in the EA.

EPA encourages additional coordination between USFWS and the wetland regulatory agencies to ensure that project implementation does not result in a net loss of wetland. The Draft EA should discuss how USFWS is in compliance with Executive Order 11990 (Protection of Wetlands).

The Draft EA should discuss the effects the proposed project will have on lowering the pool elevation behind the Dam, including the likelihood of instability over a period of many years as the river adjusts to a new, stable channel. In the interim period, the channel may headcut, which may induce incision, wasting of banks, and channel widening. Channel instability may also contribute to erosion of the many acres of exposed sediments upstream post-Dam-removal. The Draft EA should include additional information on fluvial geomorphology changes expected or possible in the new channel as it forms post-Dam removal, and the potential for these fluvial processes to affect the proposed restoration efforts.

### **SEDIMENT TESTING/DREDGING**

The EA should include sediment analyses and discuss USFWS's plan for disposal of any contaminated or uncontaminated sediments. Project design may include full or partial removal of impounded materials. Materials reviewed by EPA indicate that sediments to be dredged from the Dowagiac River and/or Dam demolition materials are proposed to be utilized to fill the adjacent raceway channel, to build up a proposed floodplain shelf in the channel reaches above the Dam, and potentially to be placed at an adjacent park site. EPA was provided with recent (2014) sediment testing that has been undertaken for the project, including specific information on sediment testing locations or protocols undertaken for dredging. The forthcoming EA should include, at a minimum, the following information:

- A map/figure outlining the proposed dredging location(s);
- Narrative information on the type and quantity (cubic yards) of material proposed to be dredged, and a proposed dredging schedule;
- Information on prior sediment sampling (prior to 2016) and results of all prior sampling, including a robust discussion of prior arsenic issues in sediments;
- A summary of sediment analyses that clearly states whether sediment behind the Dam is suitable for beneficial re-use (i.e., land application, brownfield restoration, upland fill, landfill cover, etc.);



- A discussion of sediment dispersion expected during and post removal. EPA generally does not support flushing of sediments downstream. If the volume of sediment is sufficient, removal of the Dam may not immediately restore the upstream hydraulic gradient. In this case, remobilization of sediments may occur through head-cutting, with the cut progressing upstream. The period of time required for a head cut to reach equilibrium is determined by several factors including, but not limited to, sediment composition, channel-forming flow events, high-flow events, physical characteristics of the channel (e.g., ledge), presence of infrastructure (e.g., pipeline), and whether river channel aggradation has occurred upstream of the impoundment<sup>2</sup>;
- Discussion of USFWS's plan for disposal of any contaminated sediments. Mitigation of deleterious impacts resulting from the remobilization of previously-impounded sediments may be required. Potential remedial measures may include full or partial removal of impounded materials, staged removal of a Dam to control sediment remobilization, and/or stabilizing sediment exposed through Dam removal. Based on sediment testing, EPA assumes that sediment analyses will inform how USFWS plans to deal with contaminated sediment (if present at the project site), in addition to removal of inert sediment;
- Information on the placement locations for all dredged sediment;
- Specific information on sediment testing (to include elutriate testing) regarding how dredged materials were or will be tested to ensure they are both suitable for open water disposal/shallow water placement, and also meet Michigan Water Quality Standards; and
- A discussion on how sediment, elutriate, biological, and bioaccumulation testing indicate that in-water placement of these dredged materials will not cause an adverse impact on biota or water quality.

### **NON-NATIVE INVASIVE SPECIES**

The Draft Design Report states that the riverbanks upstream of the Dam will be sloped back from a vertical bank, and that a floodplain shelf will be constructed adjacent to each side of the River below the top of bank. Specifically, the Draft Design Report states on page 37, "*We are not proposing stabilizing the banks of the excavated channel with erosion control fabric or stone because the cost of running those treatments along the full length of the excavated river would be prohibitive.*" While we acknowledge stabilizing the banks will increase the overall cost of the project, we recommend the forthcoming EA discuss how this approach will control erosion and the spread of non-native, invasive plant species which will undoubtedly colonize bare soil. We recommend the EA identify the terrestrial noxious weeds/invasive species that are found within or near the preferred alternative project area<sup>3</sup>. Early recognition and control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have more adverse impacts on biodiversity. We recommend the EA include an invasive management plan that addresses the identification and control of noxious weed/invasive species in and near the project area.

<sup>2</sup> [http://onlinepubs.trb.org/onlinepubs/archive/NotesDocs/25-25\(14\)\\_FR.pdf](http://onlinepubs.trb.org/onlinepubs/archive/NotesDocs/25-25(14)_FR.pdf)

<sup>3</sup> Michigan Department of Natural Resources (MDNR) Invasive Species Links at: [http://www.michigan.gov/dnr/0,4570,7-153-10370\\_59996-270796--,00.html](http://www.michigan.gov/dnr/0,4570,7-153-10370_59996-270796--,00.html)



### AIR QUALITY

The forthcoming EA should discuss if Berrien County is in non-attainment or maintenance for any of the National Ambient Air Quality Standards (NAAQS). Because of their impact on human health, EPA has emphasized the need to address PM<sub>2.5</sub> (and diesel emissions) through the National Clean Diesel Campaign<sup>4</sup>, along with regional initiatives.

The forthcoming EA should identify and discuss existing air quality and air quality impacts at the project location, and those potentially associated with future construction and operations at site of the proposed project. The impacts of all action alternatives on air quality should be assessed by evaluating each alternative's impacts on the NAAQS. Each alternative's potential emissions should be discussed, and should include both direct and indirect emissions that are reasonably foreseeable. Be aware that there may be state and local air quality requirements to consider. These requirements can include, but are not limited to, provisions such as State indirect source regulations and State air quality standards.

### GENERAL CONFORMITY

This project may need to address the General Conformity Rule<sup>5</sup> requirements. Under the General Conformity Rule, Federal agencies must work with State, Tribal and local governments in a nonattainment or maintenance area to ensure that Federal actions conform to the clean air quality goals as contained in the State Implementation Plan. General Conformity is required for all National Ambient Air Quality Standard nonattainment and maintenance areas.

### CONSTRUCTION IMPACTS

EPA recommends that the forthcoming EA recommend specific measures and best management practices that will be undertaken to minimize construction impacts to air quality, water resources, soil, and other regulated resources. The EA should discuss proposed construction measures, including a discussion of staging areas and their locations, access to the worksite, and a discussion of any proposed in-stream construction. EPA recommends that equipment not work from the active river, and that dewatering measures such as temporary portable dams or cofferdams be installed to isolate river flow from any active work areas.

### VEGETATION AND WILDLIFE HABITAT

It is likely that some tree removal and clearing will be required to access the project location. The forthcoming EA should include information on current vegetation. Regarding proposed tree trimming and removal, the EA should disclose the types and numbers (and acreage of shrubby areas or trees) that are proposed to be cleared for construction. The EA should also disclose whether these clearing areas are located in wetlands or stream as well as potential impacts to Indiana bat and northern long-eared bat, both species listed on the Endangered Species Act. Additionally, EPA recommends that discussion of tree clearing/removal (if located in wetland areas) specify whether trees will be mechanically cleared (bulldozed) or cut at their base (leaving

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<sup>4</sup> <http://epa.gov/diesel/>

<sup>5</sup> 42 USC 7506(c), Section 176(c)

the trunks intact). This differentiation in tree removal is important with regard to regulatory requirements under Sections 404 and 401 of the Clean Water Act.

We recommend the EA describe the manner in which trees will be disposed of. EPA strongly recommends that any woody vegetation not be burned, as burning vegetation increases air impacts, but instead be mulched and the mulch offered to the community for use in yards, parks, commercial areas, etc.

Trees provide valuable habitat and protect water quality, in part, by stabilizing soils in a watershed. EPA also recommends the draft EA include the acreage of woody vegetation that will need to be removed. We urge avoidance of this resource to the extent feasible. EPA strongly recommends voluntary tree replacement for tree loss at a 1:1 ratio or covering the same acreage amount using native tree species. Mitigation might include, but is not limited to, replanting of native tree species adjacent to the river, or assisting local, county, or state agencies with any appropriate ongoing or planned reforestation plans. We recommend a possible species list and list and map of potential sites where trees can be planted be included with the forthcoming EA.

Lastly, EPA recommends removal of woody vegetation during winter months, to the extent feasible, to avoid damage to migratory birds protected under the Migratory Bird Treaty Act. We recommend this timeframe become a commitment in the decision document.

#### **FEDERAL AND STATE ENDANGERED/THREATENED/RARE SPECIES AND CRITICAL HABITAT**

The USFWS's website<sup>6</sup> lists the presence of eight Federally-endangered, threatened, or proposed as threatened species in Berrien County. Information reviewed by EPA was not clear on whether any mussels are present in the project reach of the Dowagiac River that may provide an important native mussel source population for nearby streams and marshes in the Lake Michigan Watershed. Additionally, it is not clear to EPA if USFWS has undertaken any coordination efforts with the Michigan Department of Natural Resources (MDNR), or the Michigan Natural Features Inventory (MNFI), regarding the potential for impacts to other state-listed species, or if USFWS has coordinated with MNFI to determine if state-listed species are present within any areas proposed to be disturbed via project construction.

The Draft EA should discuss how USFWS has worked with, or initiated a Rare Species Review with MNFI. A Rare Species Review involves a refined review of the rare species in the immediate vicinity of the project. The Rare Species Review corresponds to the Endangered Species Assessment previously provided by the Wildlife Division of MDNR, as MDNR ceased to accept review requests to the Environmental Review Program after September 16, 2011. These consultations are required to determine if any Federally- or state-listed endangered or threatened species are present within the project boundaries, and if project implementation would or could detrimentally affect any listed species or their critical habitat. As on-site surveys vary by species, and in certain instances must be completed during specific short seasonal timeframes, EPA strongly encourages swift and timely coordination with MNFI as soon as possible.

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<sup>6</sup> <http://www.fws.gov/midwest/endangered/lists/michigan-cty.html>



Correspondence to and from the MNFI regarding required consultation efforts should be included in the forthcoming EA. State coordination with the MDNR - National Heritage Program may be required under Part 365 (Endangered Species) of the Michigan Natural Resources and Environmental Protection Act prior to commencement of construction activity. Additionally, the EA should include information on the requirement for consultation for both Federally- and state-threatened and endangered species, and information on the status and results of those consultation efforts.

### **HISTORIC, ARCHITECTURAL, ARCHAEOLOGICAL, & CULTURAL RESOURCES**

The Draft EA should include information on USFWS's consultation with the Michigan State Historic Preservation Office (SHPO) under Section 106 of the National Historic Preservation Act regarding potential detrimental impacts to the Pucker Street Dam and/or any other sites within the project's Area of Potential Effect.

### **PERMITS/PLANS**

The EA should also include a list of all Federal, state, and local permits that will be required to undertake the proposed actions. If construction plans for the action alternatives are available at the time, please include them with the EA. EPA understands that construction plans may be draft or at less than 100% design.

### **MEASURES OF SUCCESS**

The EA should discuss the potential for restoration activities along the affected River stretches if the Dam and its appurtenant structures are removed. EPA recommends development of an Adaptive Management Plan (AMP) with a description of actions to be undertaken if it is determined that restoration is unsuccessful based on the measures of success selected. We recommend the AMP include action triggers based on monitoring. This should be included as an appendix to the EA.

### **MONITORING/MAINTENANCE**

The EA should discuss duration of monitoring and rationale for selecting that time period. Key features of the monitoring plan should also be included (e.g., vegetation density, invasive species, observed wildlife, wildlife habitat, etc.). Monitoring plans should also discuss the intervals at which (after construction and restoration activities are complete) project performance will be measured. Monitoring plans should clearly state which entity(s) (e.g., USFWS, state resource agency, local government, non-governmental organization) will be responsible for monitoring and maintenance activities, and if an entity other than USFWS will be responsible for monitoring and maintenance activities, how USFWS will ensure project standards are met.

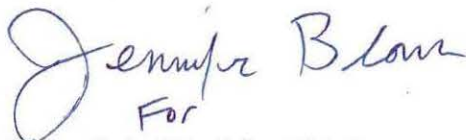


### CORRESPONDENCE

For all environmental impact categories requiring coordination with other Federal or state agencies, EPA recommends that you provide copies of both your letters to those agencies, as well as the responses from those agencies, in the EA. Please include a complete copy of the wetland delineation/determination and MDEQ/USACE regulatory correspondence (e.g., jurisdictional determination) with the forthcoming EA.

Thank you for the early solicitation of EPA's comments regarding the proposal. We are available to discuss our comments with you in further detail if requested. If you have any questions about this letter, please contact the project lead, Ms. Liz Pelloso, PWS, at 312-886-7425 or via email at [pelloso.elizabeth@epa.gov](mailto:pelloso.elizabeth@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jennifer Blane". Below the signature, the word "For" is written in a smaller, cursive script.

Kenneth A. Westlake, Chief  
NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

cc (via email):

Marcy Hamilton, Southwest Michigan Planning Commission  
Oscar Loveless, Wightman Associates  
Brian Gunderman, MDNR-Fisheries  
Luke Trumble, MDEQ-Dam Safety  
Ben Zimont, MDEQ-Land/Water Interface Permitting  
Dean Anderson, Michigan SHPO