



United States Department of the Interior

National Park Service
Midwest Region
601 Riverfront Drive
Omaha Nebraska 68102-4226

18-00127 (MWR-LCPP/G)

September 16, 2016

Mr. Cameron Clark
Director, Indiana Department of Natural Resources
402 West Washington Street, W 256
Indianapolis, Indiana 46204

Dear Mr. Clark:

It was a pleasure meeting you and members of the Indiana State Parks team last week during the National Association of State Park Directors Conference in French Lick, Indiana. Your team did an amazing job hosting this meeting.

Thank you for setting aside time to sit down with the National Park Service staff to review and discuss further details of the Indiana Dunes State Park Pavilion Restoration Project; we thought it was a worthwhile discussion. We want to reiterate the highlights of that conversation to ensure we are all on the same page.

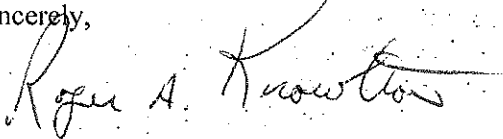
First and foremost, we were pleased to hear the Indiana Department of Natural Resources (INDNR) is reviewing and working with Pavilion Partners to adjust the lease to reflect the Land and Water Conservation Fund (LWCF) provisions and restrictions. We spent time after the meeting thinking of the best sequence of the restoration project pieces and strongly recommend updating the lease as a top priority for INDNR. Please refer to Chapter 8 – Section D. of the 2008 LWCF Manual for items that must be addressed.

After visiting the pavilion at Indiana Dunes State Park, hearing more about the planned uses of the space, and knowing a revised lease is forthcoming, we continue to believe that the currently planned uses and work proposed for the existing pavilion would be acceptable in accordance with the memorandum for Allowable Uses of Buildings Located on LWCF 6(f)(3) Protected Lands (Memo) dated January 16, 2014. Currently, we believe that the following planned allowable uses (or facilities) will serve the site's outdoor recreating public: lifeguard station, general store, ice cream shop, and different dining options (beachside, sit down dining room, and roof top lounge). Once the lease is revised, per the Memo referenced above, NPS review and approval would not be required for the proposed improvements or changes to the building to accommodate these allowable uses because the building was constructed before the establishment of Section 6(f)(3) of the LWCF Act.

Finally, based on the information provided, we continue to believe that the banquet/conference center would trigger a conversion. Although the facility could bring additional visitors to the park, it seems these visitors' primary purpose for visiting Indiana Dunes would be to attend a function held in the facility, making outdoor recreation secondary to the facility event. Meanwhile visitors who come to the park primarily to recreate will not have access to the facility. Taken together, we believe these circumstances would prevent the facility from being either secondary to or supportive of public outdoor recreation, as required by the LWCF Manual.

Please feel free to reach out to me if you have any questions or concerns about the items outlined above. Once again, congratulations to the State for a fabulous conference and enjoy the rest of your State Parks Centennial Celebration.

Sincerely,

A handwritten signature in cursive script that reads "Roger A. Knowlton". The signature is written in black ink and is positioned above the typed name.

Roger A. Knowlton
Acting Chief, Recreation Grants