



Costa Kutulas
Director of Parks and Maintenance
540 Hibbard Road
Winnetka, Illinois 60093

December 5, 2025

Eric Otto
Senior Water Resources Engineer
Illinois Coastal Management Program
Illinois Department of Natural Resources
Lake Michigan Programs
160 N. LaSalle Street, Suite S-703
Chicago, IL 60601

Subject: Federal Consistency Certification – Centennial Beach Temporary Dog Beach Fencing Project

Dear Mr. Otto,

The Winnetka Park District hereby submits this Federal Consistency Certification for the Centennial Beach Temporary Dog Beach Fencing Project, pursuant to the requirements of the Illinois Coastal Management Program (ICMP) Federal Consistency Review Procedures (2025).

The project involves the installation of chain-link fencing required to maintain compliance with the Cook County Animal Control Ordinance. The fencing will be supported by posts driven directly into sand and underlying clay to refusal, with no dredged or fill material discharged into Lake Michigan.

The Winnetka Park District acknowledges that the project must comply with Illinois' approved coastal management program and will be carried out in a manner consistent with all applicable policies.

I would also like to clarify the use of the term “temporary” as referenced in the application. The Park District intends to install the fencing as noted and shown in the submitted plans and permit

540 Hibbard Road, Winnetka, IL 60093
www.winpark.org

(847) 501-2040
Fax: (847) 501-5779



documents. Based on further discussions with the Village of Winnetka during the ongoing Special Use Permit process, the easternmost 20 feet of fencing on both the north and south sections will be designed to be removable. This modification is intended to alleviate concerns regarding potential winter storm and ice-related damage. Seasonal removal would occur approximately mid-November through late March or early April. For the remainder of the year, the fencing will remain installed as depicted in the permit drawings.

The Park District does anticipate future master planning efforts for Centennial Beach; however, no formal plans have been approved at this time. Until any future improvement plans are completed and submitted for permitting, the District intends for the proposed fencing configuration to remain in place to ensure public safety, pending approval by all applicable permitting agencies.

Please contact me with any questions or requests for additional documentation.

Sincerely,

Costa Kutulas
Director of Parks & Maintenance
Winnetka Park District
540 Hibbard Road, Winnetka, IL 60093

CC: Soren G. Hall, U.S. Army Corps of Engineers, Chicago District – Regulatory Branch
Sophia Morgan, U.S. Army Corps of Engineers, Chicago District – Regulatory Branch
Shannon Nazzal, Executive Director - Winnetka Park District



Illinois Coastal Management Program (ICMP)
Federal Consistency Submission Packet
Centennial Beach Dog Beach Fencing Project
Winnetka Park District
225 Sheridan Road
Winnetka, Illinois 60093

Executive Summary

The Winnetka Park District proposes the installation of fencing at Centennial Beach to maintain compliance with county requirements for off-leash dog areas and address safety concerns. The fencing includes two short segments extending approximately 15 feet into Lake Michigan, with all posts driven into existing substrate and no fill, dredging, or excavation proposed. The easternmost 20 feet of fencing on both the north and south sections is designed to be removable. This modification is intended to alleviate concerns regarding potential winter storm and ice-related damage. Seasonal removal would occur approximately mid-November through late March or early April. For the remainder of the year, the fencing will remain installed as depicted in the permit drawings.

A full range of alternatives was evaluated, including offsite locations, onsite alignment variations, reduced waterward extensions, and upland-only fencing options. Alternatives were dismissed due to impracticability, safety issues, or greater environmental impacts.

Required ICMP Project Information

Applicant Contact:
Costa Kutulas, Director of Parks & Maintenance
Winnetka Park District
540 Hibbard Road, Winnetka, IL 60093

Project Description

4-foot chain-link fencing supported by driven posts, extending approximately 15 feet lakeward from existing steel seawall, including two public access gates. No fill, dredge, or permanent structures. The easternmost 20 feet of fencing on both the north and south sections is designed to



be removable. This modification is intended to alleviate concerns regarding potential winter storm and ice-related damage.

Location

Centennial Beach, 225 Sheridan Road, Winnetka, IL 60093

Latitude: 42.09821° N | Longitude: -87.71452° W

Project Duration

Two-week installation period; seasonal removal of the eastern most 20' (estimated, distance may change due to changing lake levels at the time of removal for winter) of fencing to alleviate winter storm damage.

Federal Consistency Certification Statement

"The proposed activity complies with Illinois' approved coastal management program and will be conducted in a manner consistent with such policies."

Exhibits

- #1 - U.S. Army Corps Joint Permit Application (submitted separately)
- #2 - Project plans and fencing diagrams
- #3 - Location map and aerial imagery
- #4 - Alternatives Analysis Report (LEDPA Determination, submitted separately)

Exhibit #1

JOINT APPLICATION FORM FOR ILLINOIS										
ITEMS 1 AND 2 FOR AGENCY USE										
1. Application Number					2. Date Received					
3. and 4. (SEE SPECIAL INSTRUCTIONS) NAME, MAILING ADDRESS AND TELEPHONE NUMBERS										
3a. Applicant's Name: Company Name (if any) : Address: Email Address:			3b. Co-Applicant/Property Owner Name (if needed or if different from applicant): Company Name (if any): Address: Email Address:			4. Authorized Agent (an agent is not required): Company Name (if any): Address: Email Address:				
Applicant's Phone Nos. w/area code Business: Residence: Cell: Fax:			Applicant's Phone Nos. w/area code Business: Residence: Cell: Fax:			Agent's Phone Nos. w/area code Business: Residence: Cell: Fax:				
STATEMENT OF AUTHORIZATION										
I hereby authorize, _____ to act in my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this permit application.										
_____					_____					
Applicant's Signature					Date					
5. ADJOINING PROPERTY OWNERS (Upstream and Downstream of the water body and within Visual Reach of Project)										
Name		Mailing Address					Phone No. w/area code			
a.										
b.										
c.										
d.										
6. PROJECT TITLE:										
7. PROJECT LOCATION:										
LATITUDE: LONGITUDE:					UTM's Northing: Easting:					
STREET, ROAD, OR OTHER DESCRIPTIVE LOCATION					LEGAL DESCRIP	QUARTER	SECTION	TOWNSHIP NO.	RANGE	
<input type="checkbox"/> IN OR <input type="checkbox"/> NEAR CITY OF TOWN (check appropriate box) Municipality Name					WATERWAY				RIVER MILE (if applicable)	
COUNTY		STATE	ZIP CODE							

Revised 2010

☐ Corps of Engineers

☐ IL Dep't of Natural Resources

☐ IL Environmental Protection
Agency

☐ Applicant's Copy

8. PROJECT DESCRIPTION (Include all features):					
9. PURPOSE AND NEED OF PROJECT:					
COMPLETE THE FOLLOWING FOUR BLOCKS IF DREDGED AND/OR FILL MATERIAL IS TO BE DISCHARGED					
10. REASON(S) FOR DISCHARGE:					
11. TYPE(S) OF MATERIAL BEING DISCHARGED AND THE AMOUNT OF EACH TYPE IN CUBIC YARDS FOR WATERWAYS: TYPE: AMOUNT IN CUBIC YARDS:					
12. SURFACE AREA IN ACRES OF WETLANDS OR OTHER WATERS FILLED (See Instructions)					
13. DESCRIPTION OF AVOIDANCE, MINIMIZATION AND COMPENSATION (See instructions)					
14. Date activity is proposed to commence	Date activity is expected to be completed				
15. Is any portion of the activity for which authorization is sought now complete? Yes <input type="checkbox"/> No <input type="checkbox"/> Month and Year the activity was completed					
NOTE: If answer is "YES" give reasons in the Project Description and Remarks section. Indicate the existing work on drawings.					
16. List all approvals or certification and denials received from other Federal, interstate, state, or local agencies for structures, construction, discharges or other activities described in this application.					
<u>Issuing Agency</u>	<u>Type of Approval</u>	<u>Identification No.</u>	<u>Date of Application</u>	<u>Date of Approval</u>	<u>Date of Denial</u>
17. CONSENT TO ENTER PROPERTY LISTED IN PART 7 ABOVE IS HEREBY GRANTED.				Yes	No
18. APPLICATION VERIFICATION (SEE SPECIAL INSTRUCTIONS) Application is hereby made for the activities described herein. I certify that I am familiar with the information contained in the application, and that to the best of my knowledge and belief, such information is true, complete, and accurate. I further certify that I possess the authority to undertake the proposed activities. <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">Signature of Applicant or Authorized Agent</div> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">Date</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">Signature of Applicant or Authorized Agent</div> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">Date</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">Signature of Applicant or Authorized Agent</div> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">Date</div> </div>					

☐ Corps of Engineers
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☐ IL Dep't of Natural Resources

☐ IL Environmental Protection Agency

☐ Applicant's Copy Agency

SEE INSTRUCTIONS FOR ADDRESS

LOCATION MAP

Revised 2010

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PLAN VIEW

FOR AGENCY USE ONLY

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Agency

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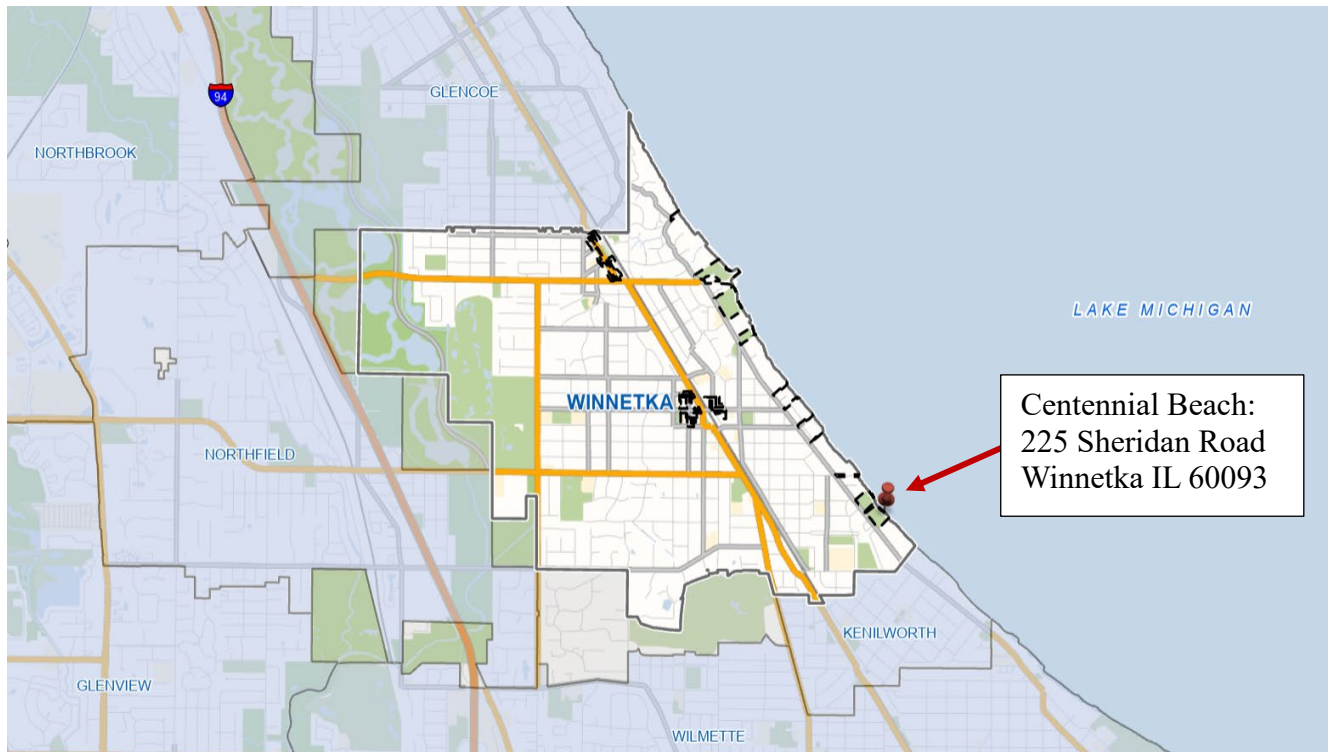
Winnetka Park District

Location Map: Centennial Beach, 225 Sheridan Road, Winnetka Illinois 60093

Project Title: Centennial Dog Beach Temporary Dog Beach Fencing

Latitude: 42.09821°N

Longitude: -87.71452°W



Winnetka Park District
Centennial Dog Beach Temporary Dog Beach Fencing
Location of Project: 225 Sheridan Road, Winnetka, IL 60093
Adjacent Property Owners List

List of property owners (from North to South):

1. John A. Edwardson, 301 Sheridan Road, Winnetka, IL 60093

(mailing: 585 Bank Lane, Lake Forest IL 60045)

2. Elder Lane Beach, 299 Sheridan Road, Winnetka, IL 60093

(mailing: Winnetka Park District, 540 Hibbard Road, Winnetka, IL 60093)

3. Orchard 2020 Revocable Trust, 261 Sheridan Road, Winnetka, IL 60093

(mailing: 353 N. Clark Street, Floor 27, Chicago, IL 60654)

4. Subject Property: Centennial Park, 225 Sheridan Road, Winnetka, IL 60093 (Permit Location)

(mailing: Winnetka Park District, 540 Hibbard Road, Winnetka, IL 60093)

5. Orchard 2020 Revocable Trust, 209 Sheridan Road (to be known as 205 Sheridan Road), Winnetka, IL 60093

(mailing: 353 N. Clark Street, Floor 27, Chicago, IL 60654)

6. Walton 2019 Revocable Trust, 203 Sheridan Road (to be known as 205 Sheridan Road), Winnetka, IL 60093

(mailing: 353 N. Clark Street, Floor 27, Chicago, IL 60654)

7. Orchard 2020 Revocable Trust, 195 Sheridan Road (to be known as 205 Sheridan Road), Winnetka, IL 60093

(mailing: 353 N. Clark Street, Floor 27, Chicago, IL 60654)

8. Nancy Santi, 191 Sheridan Road, Winnetka, IL 60093

9. Joint Management LLC, 181 Sheridan Road, Winnetka, IL 60093

(mailing: 309 W. Chicago Avenue, #1R, Chicago, IL 60654)

10. Robert & Carol Rasmus, 175 Sheridan Road, Winnetka, IL 60093

11. Richard Tinberg, 159 Sheridan Road, Winnetka, IL 60093

12. Jason Hanold, 151 Sheridan Road, Winnetka, IL 60093

(mailing: 207 Cumberland Avenue, Kenilworth, IL 60043)

13. John McDonagh, 141 Sheridan Road, Winnetka, IL 60093

14. Mike Bonds, 139 Sheridan Road, Winnetka, IL 60093

**East Wacker Drive
Suite 2700
Chicago, Illinois 60601
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540 Hibbard Rd
Winnetka, IL 60093

Temporary Dog Beach Fencing

**225 Sheridan Rd
Winnetka, IL 60093**



ISSUED FOR PERMIT
April 25, 2025
REVISIONS

No	Date	Issue

VICINITY MAP

SCALE IN FEET
1" = 30'

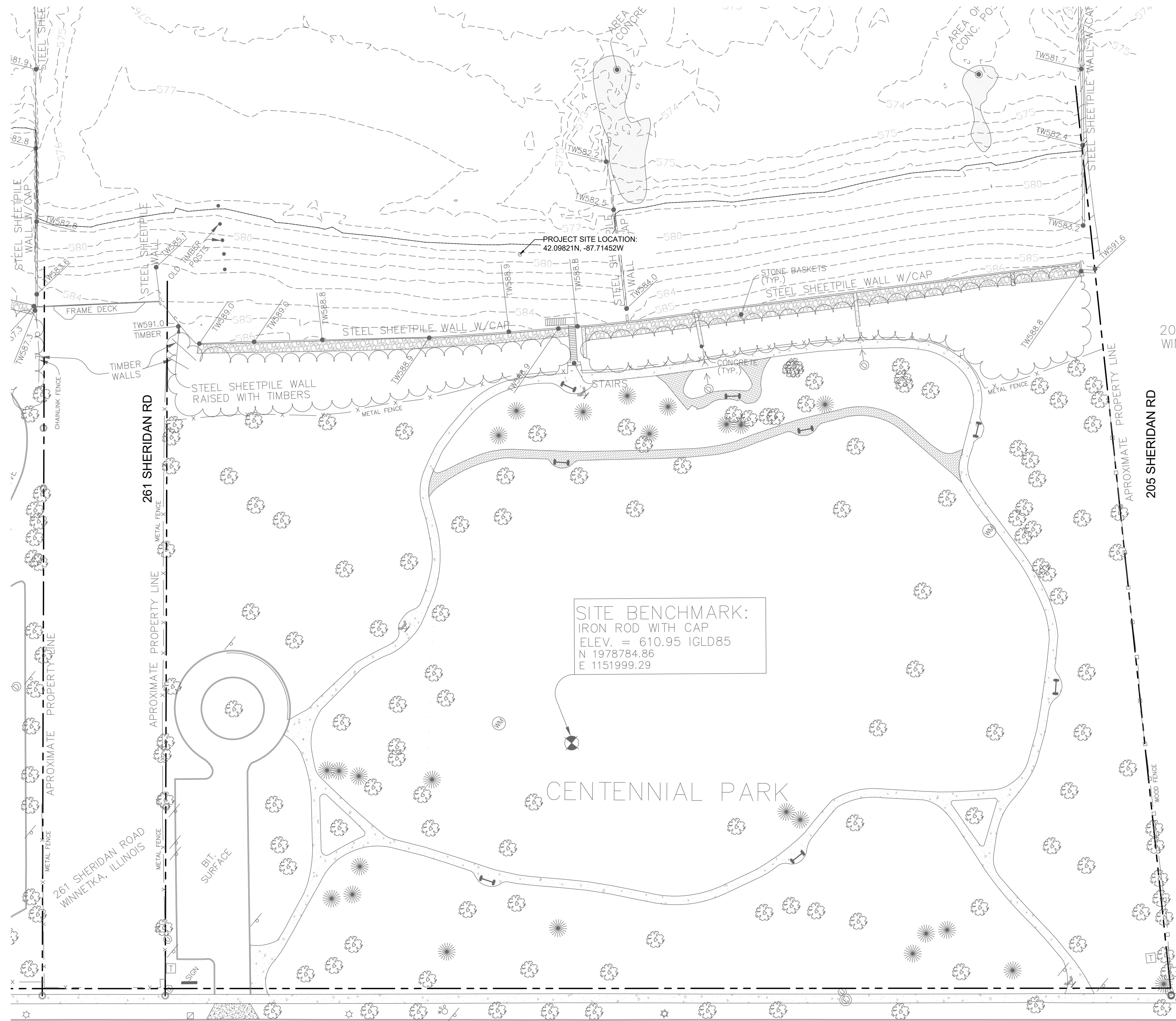
' 15' 30' 90'

NORTH **SHEET NUMBER**



L1.0

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SITE FENCING PLAN

SCALE IN FEET
1" = 20'

0' 10' 20' 60'

NORTH

SHEET NUMBER
L2.0
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The main site plan shows the layout of the temporary dog beach fencing along Sheridan Rd. It includes a north fence with two 10'-0" double gates, a south fence with two 3'-3" single gates, and a steel sheetpile wall with a cap. The plan also shows the water level per 10/21/24 survey (elevation 578.6), the project site location (42.09821N, -87.71452W), and various elevation points (TW581.7, TW582.2, TW582.5, TW584.0, TW588.8, TW588.9, TW589.0, TW589.1, TW591.6, TW591.0 MBER). The plan also shows the area of old concrete posts, stone baskets (typ.), concrete (typ.), stairs, and a metal fence. The plan is bounded by 261 SHERIDAN RD on the left and 205 SHERIDAN RD on the right. The approximate property line is shown on the right side.

Detail 1: Double Access Gate at Dog Beach - Elevation
Scale: 1/2" = 1'-0"
This detail shows a double gate with a double gate latch for public access, a steel frame attached to hinges, and two gate hinges mounted to the gate. The gate is 5' o.c., typ.

Detail 2: Single Access Gate at Dog Beach - Elevation
Scale: 1/2" = 1'-0"
This detail shows a single gate with a single gate latch for public access, a steel frame attached to hinges, and gate hinges mounted to the gate. The gate is 3'-3" o.c., typ.

H:\Lakota_files\Projects\2023\23008 - Elder Lane-Centennial Park\07 Graphics\03 DD CD\01 CAD\20250422 Centennial Dog Beach Fencing Application.dwg

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No	Date	Issue

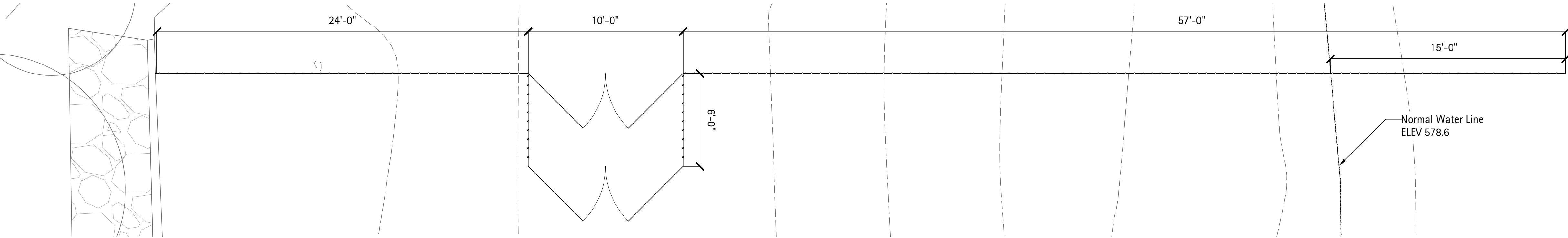
FENCE
ELEVATIONS

SCALE IN FEET
1/4" = 1'-0"

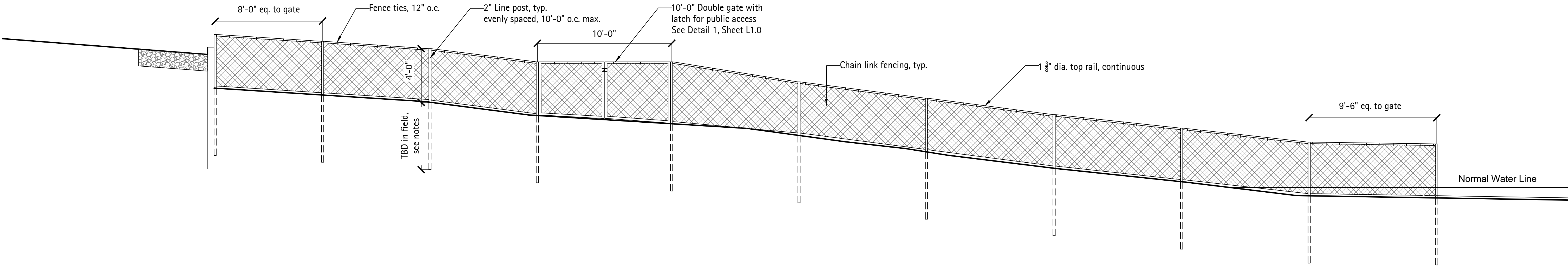
0' 2' 4' 12'

NORTH

SHEET NUMBER
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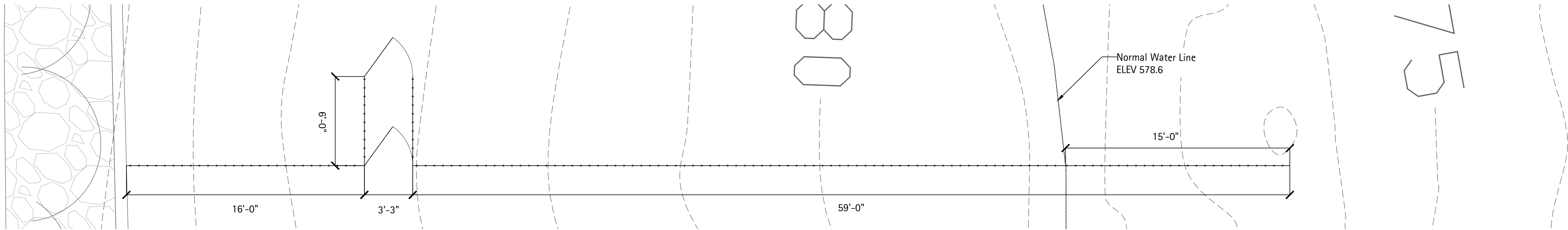
Plan



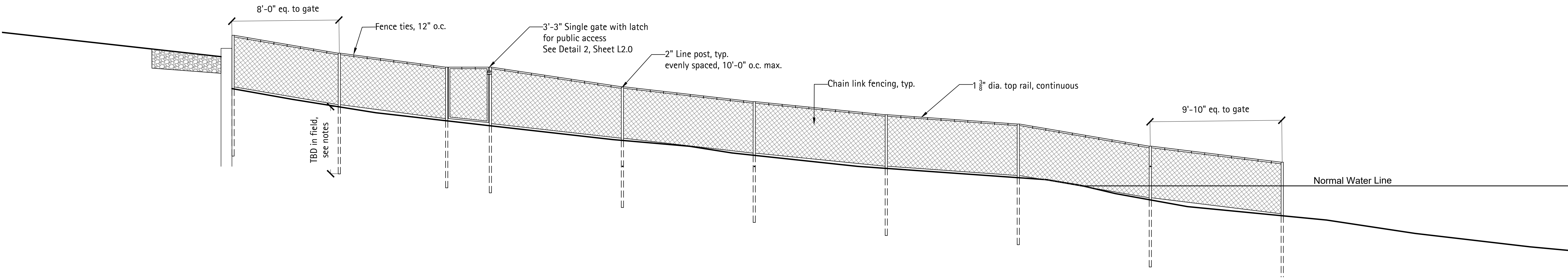
1 Elevation - North Dog Beach Fence

Scale: 1/4" = 1'-0"

- Notes:
- Steel top rail to run continuously over multiple posts.
 - Posts to be driven into the sand and underlying clay until refusal. Posts will then be cut 48" above the sand line



Plan



2 Elevation - South Dog Beach Fence

Scale: 1/4" = 1'-0"

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540 Hibbard Rd
Winnetka, IL 60093

CENTENNIAL DOG BEACH

Dog Beach
Fencing

225 Sheridan Rd
Winnetka, IL 60093

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April 25, 2025

REVISIONS		
No	Date	Issue
	12/4/25	Revised for USACE

VICINITY MAP

SCALE IN FEET
1" = 30'

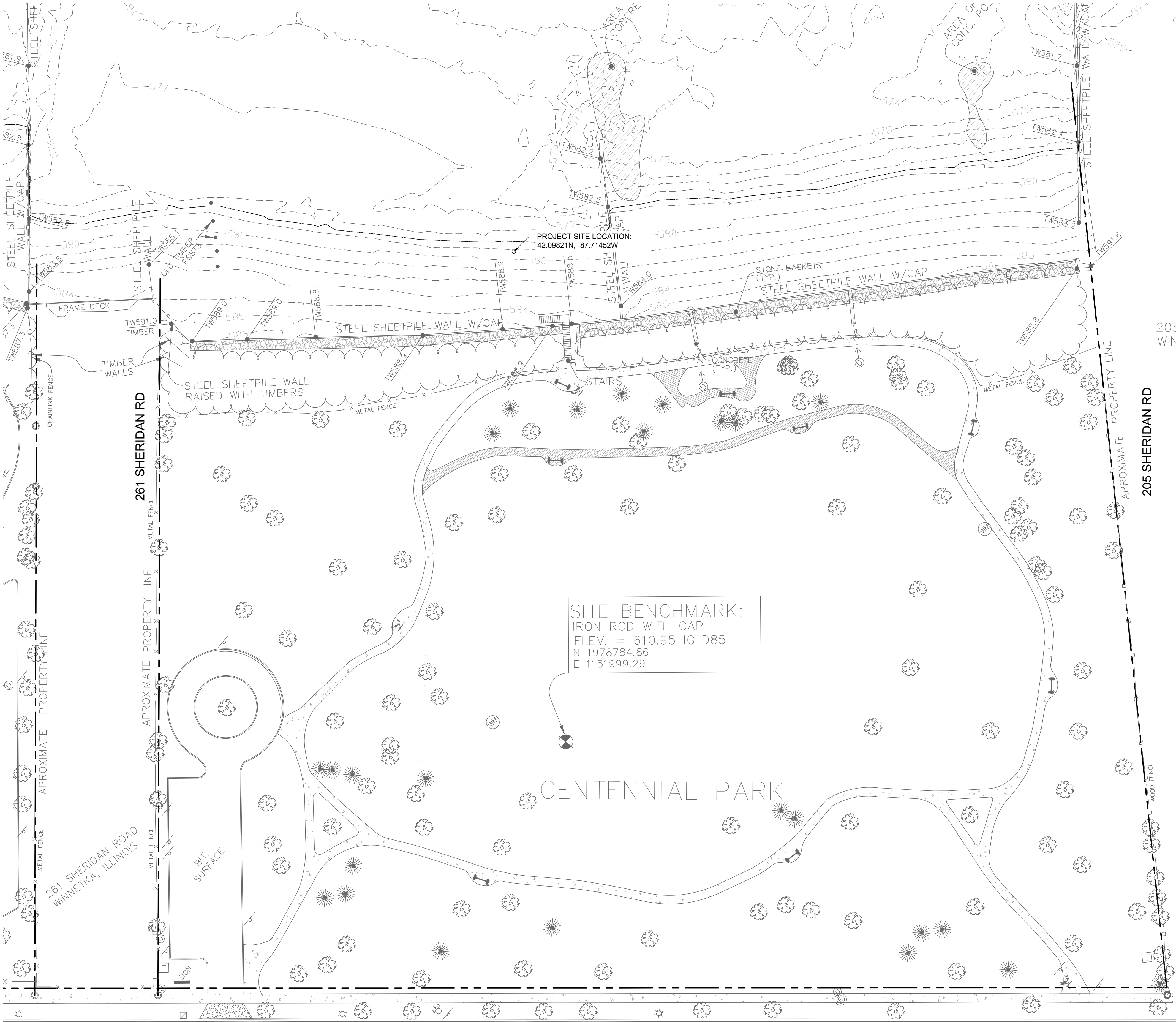
0' 15' 30' 90'

NORTH

SHEET NUMBER

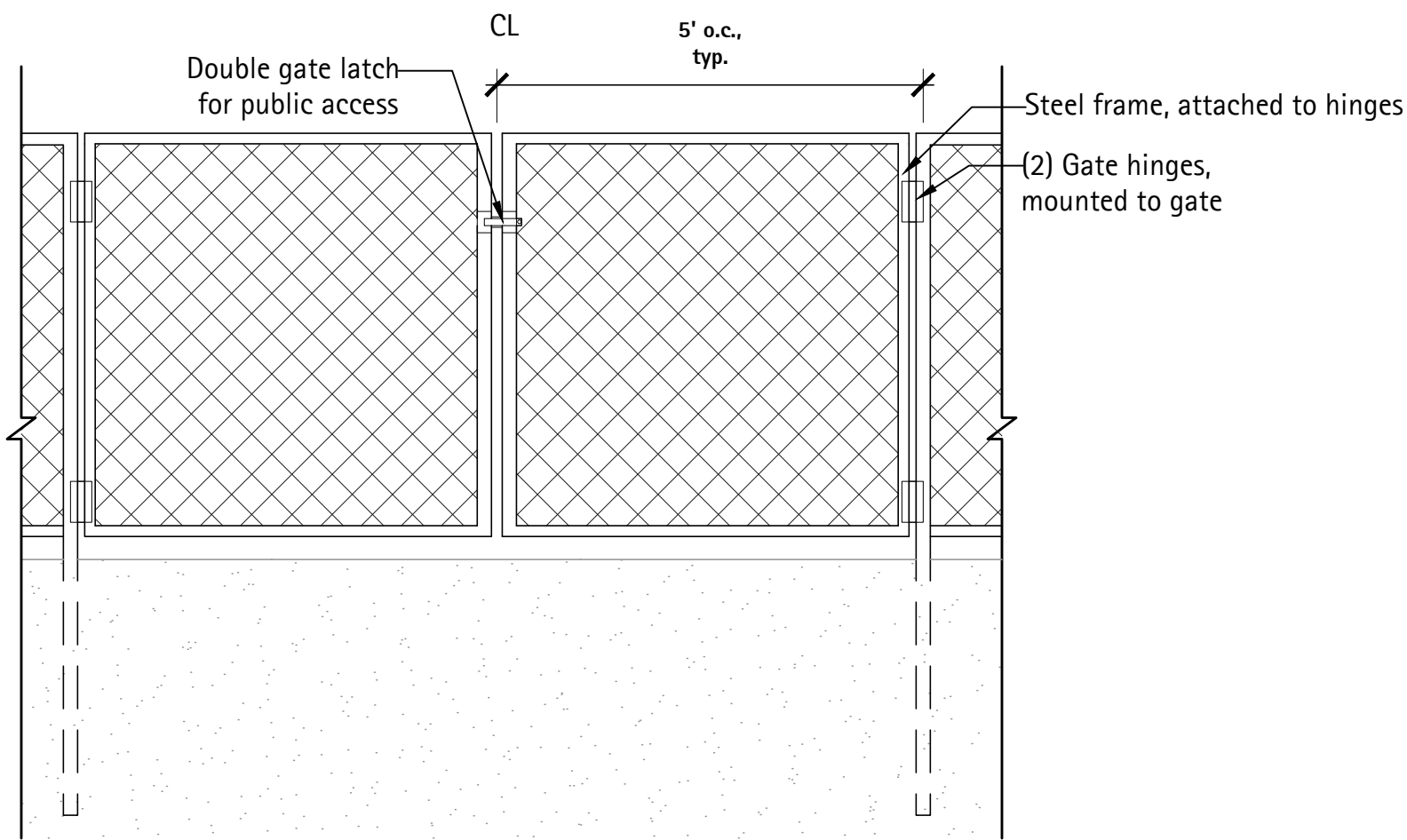
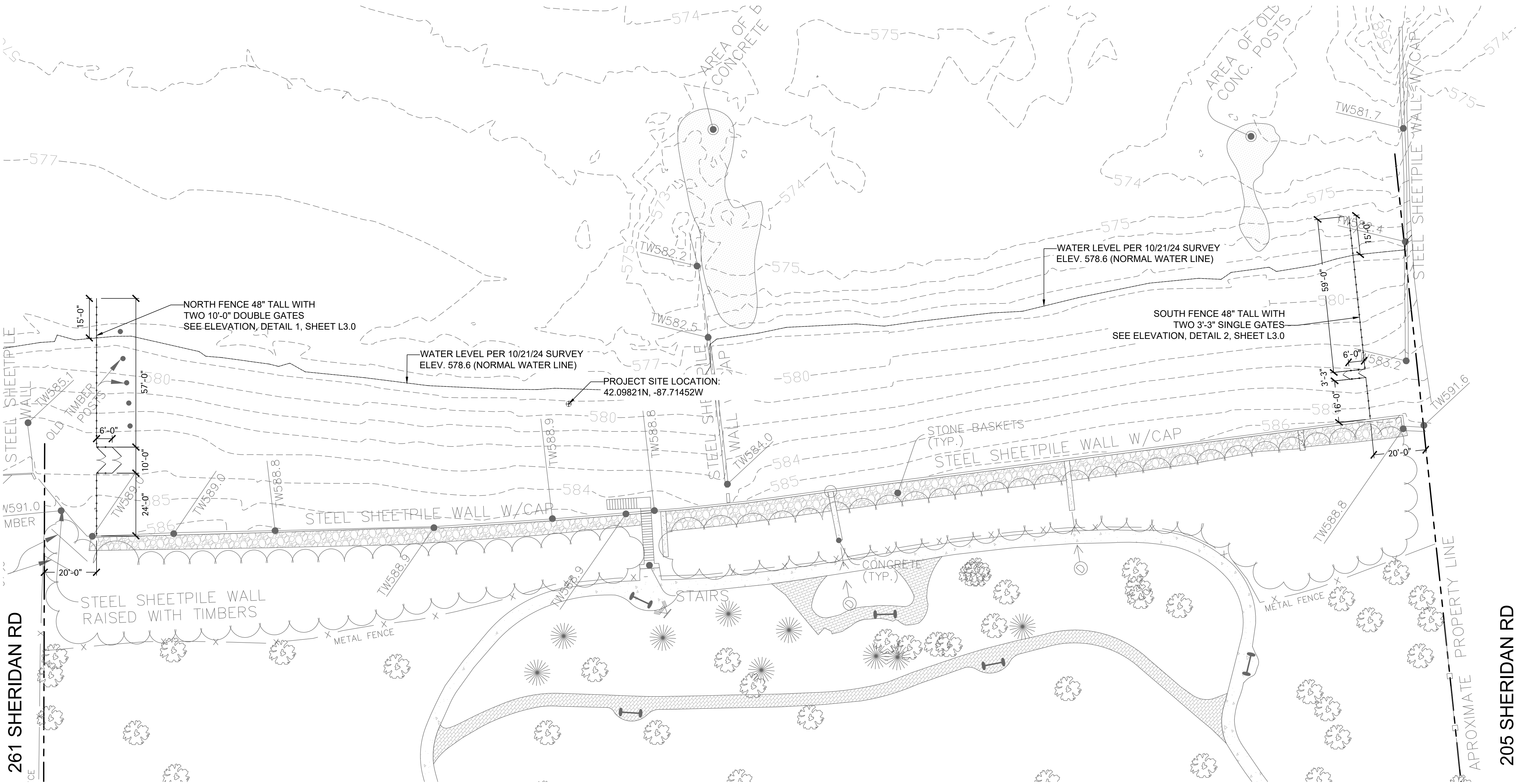
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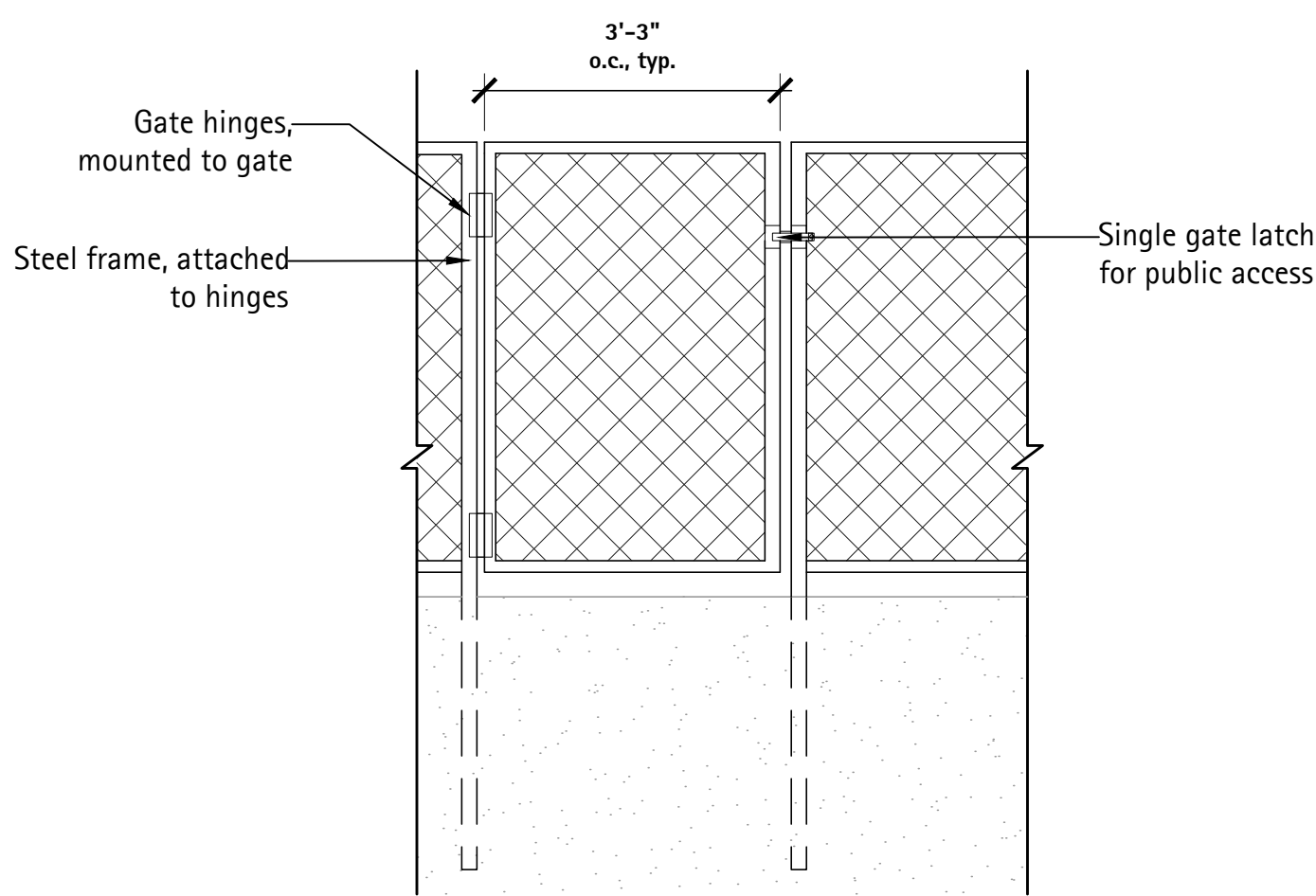


SHERIDAN ROAD

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1 Double Access Gate at Dog Beach - Elevation
Scale: 1/2" = 1'-0"



2 Single Access Gate at Dog Beach - Elevation
Scale: 1/2" = 1'-0"

Note: The easternmost 20 feet of the proposed fencing is designed to allow for seasonal removal during the winter months in order to prevent damage from storm conditions and ice formation.

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PREPARED FOR Winnetka Park District

540 Hibbard Rd
Winnetka, IL 60093

CENTENNIAL DOG BEACH Dog Beach Fencing

225 Sheridan Rd
Winnetka, IL 60093



ISSUED FOR PERMIT
April 25, 2025
REVISIONS

No	Date	Issue
	12/4/2025	Revised for USACE

SITE FENCING PLAN

SCALE IN FEET
1" = 20'
0' 10' 20' 60'



SHEET NUMBER

L2.0

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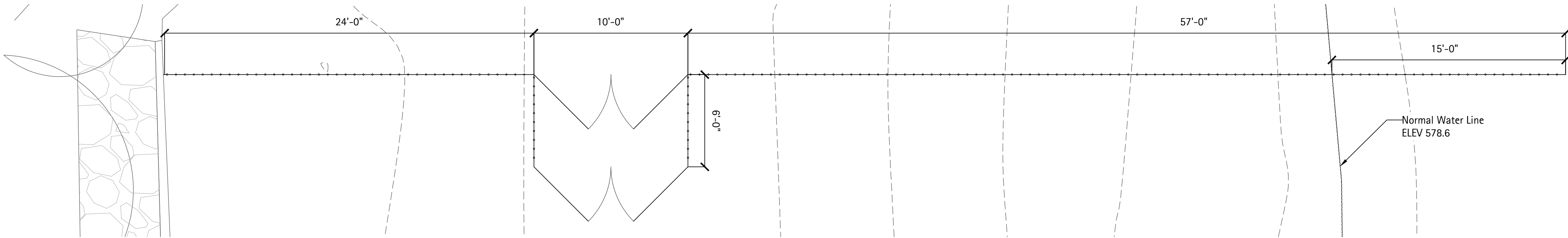
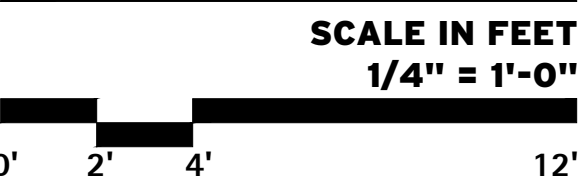
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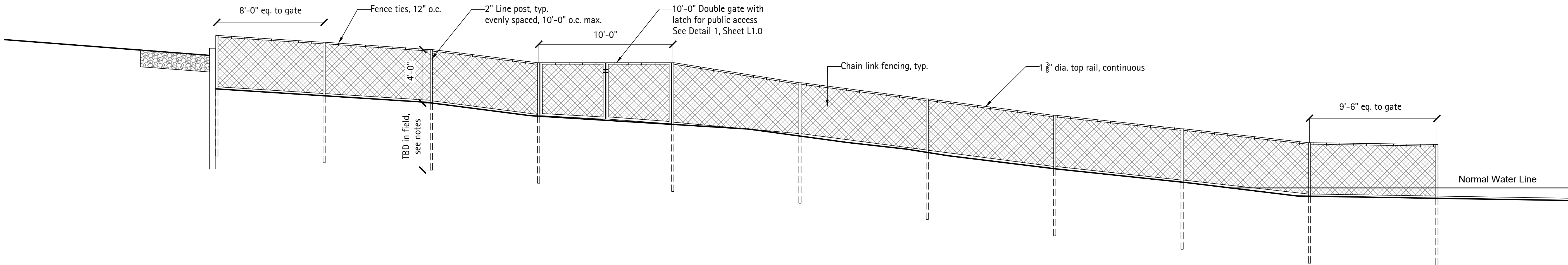
It's the law.

ISSUED FOR PERMIT April 25, 2025 REVISIONS		
No	Date	Issue
	12/4/2025	Revised for USACE

FENCE
ELEVATIONS



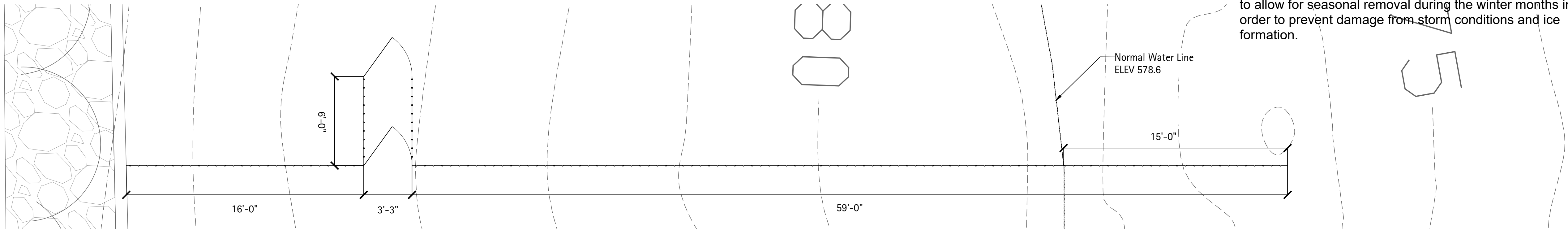
Plan



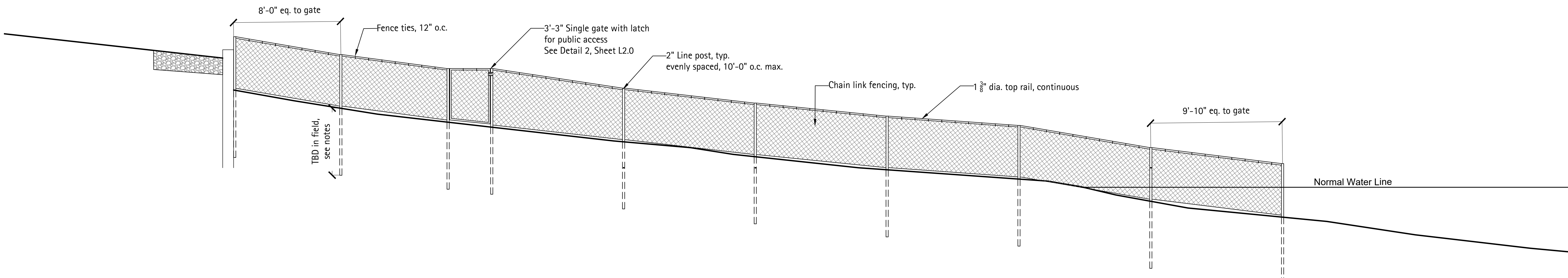
1 Elevation - North Dog Beach Fence

Scale: 1/4" = 1'-0"

- Notes:
- Steel top rail to run continuously over multiple posts.
 - Posts to be driven into the sand and underlying clay until refusal. Posts will then be cut 48" above the sand line
 - The easternmost 20 feet of the proposed fencing is designed to allow for seasonal removal during the winter months in order to prevent damage from storm conditions and ice formation.



Plan



2 Elevation - South Dog Beach Fence

Scale: 1/4" = 1'-0"

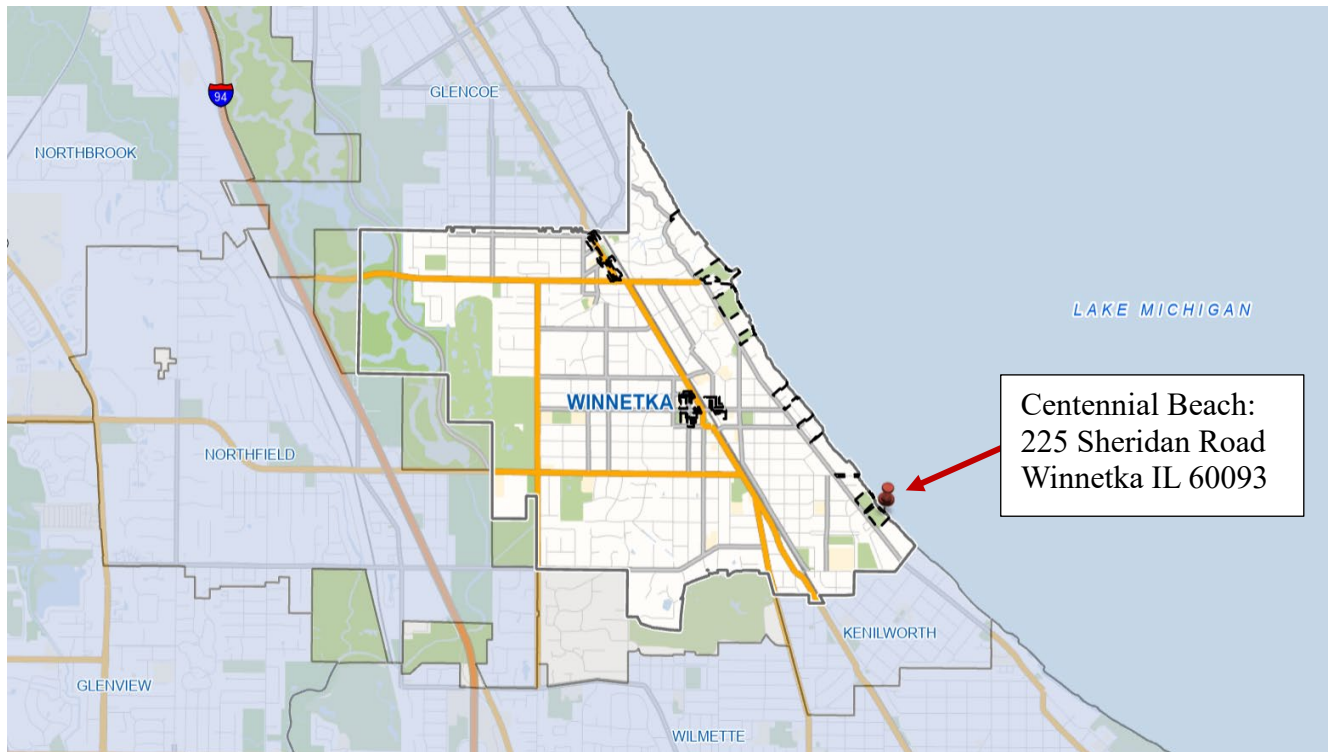
Winnetka Park District

Location Map: Centennial Beach, 225 Sheridan Road, Winnetka Illinois 60093

Project Title: Centennial Dog Beach Temporary Dog Beach Fencing

Latitude: 42.09821°N

Longitude: -87.71452°W



Centennial Beach, 225 Sheridan Road, Winnetka Illinois 60093

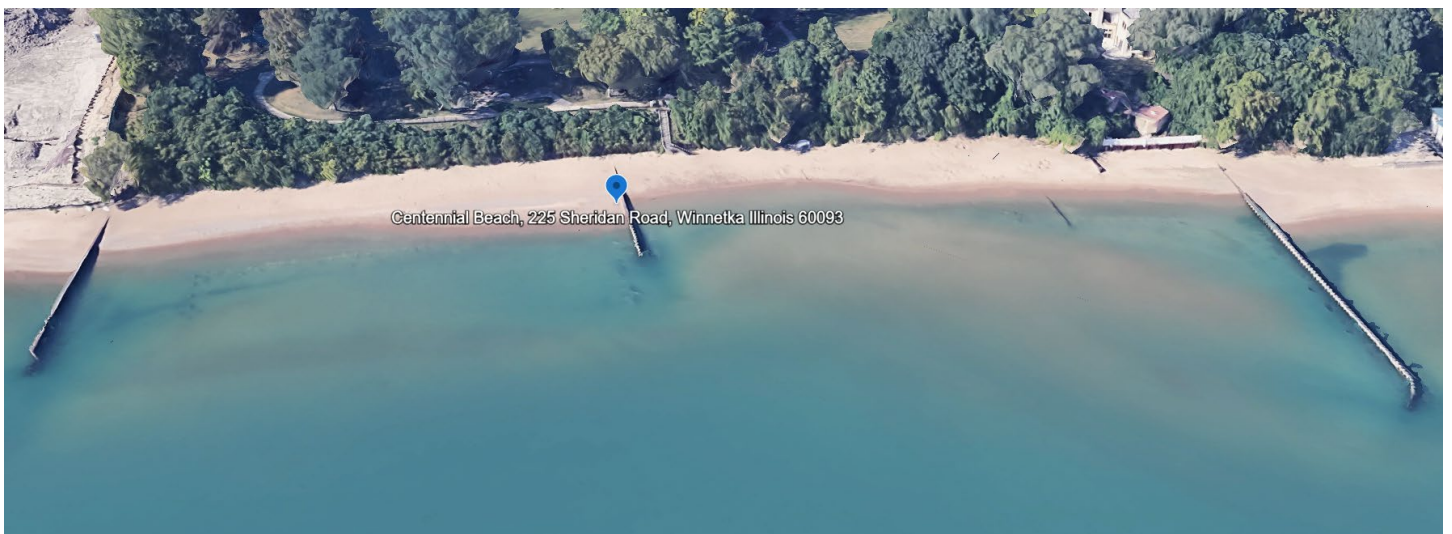
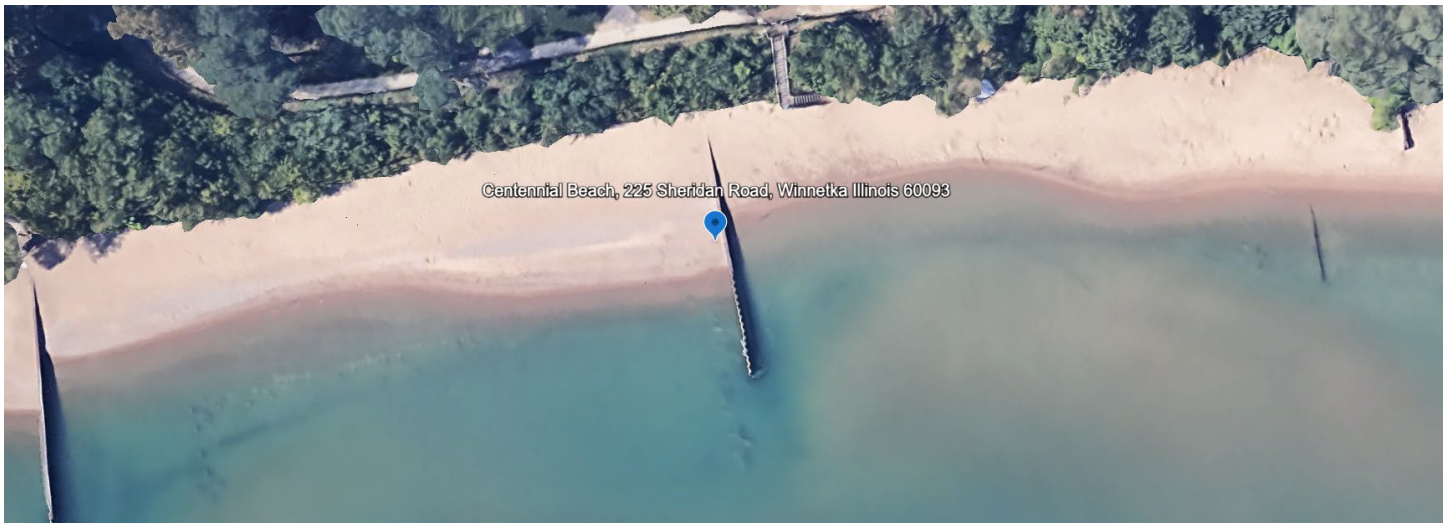


Exhibit #6



Costa Kutulas
Director of Parks and Maintenance
540 Hibbard Road
Winnetka, Illinois 60093

November 20, 2025

Sophia Morgan
Project Manager
Regulatory Branch - U.S. Army Corps of Engineers
231 S. La Salle St, Suite 1500
Chicago, Illinois 60604

Permit Application LRC-2023-0082 Centennial Dog Beach Fencing Alternatives Analysis

Dear Sophia,

On behalf of the Winnetka Park District, I am submitting the enclosed Alternatives Analysis for the Centennial Beach Temporary Dog Beach Fencing Project located at 225 Sheridan Road in Winnetka, Illinois. This analysis has been prepared in accordance with the U.S. Army Corps of Engineers' Checklist for Preparing an Alternatives Analysis, consistent with the requirements of the Section 404(b)(1) Guidelines and the National Environmental Policy Act (NEPA).

As detailed in both the Alternatives Analysis and the Joint Permit Application, the proposed project consists solely of the installation of temporary chain-link fencing required to ensure compliance with the Cook County Animal Control Ordinance. The fencing will be supported by posts driven directly into sand and underlying clay to refusal, with no dredged or fill material placed into Lake Michigan.

The enclosed Alternatives Analysis demonstrates that the proposed project:

- Meets the Applicant's overall project purpose,
- Avoids the discharge of fill material into Waters of the United States,
- Minimizes lakebed disturbance to only temporary driven posts, and
- Represents the Least Environmentally Damaging Practicable Alternative (LEDPA).



We respectfully request the Corps' review of the enclosed documentation and welcome any follow-up questions or requests for clarification. Please feel free to contact me directly at

Thank you for your time and consideration.

Sincerely,

Costa Kutulas
Director of Parks & Maintenance
Winnetka Park District



EXECUTIVE SUMMARY

Centennial Beach Temporary Dog Beach Fencing – Alternatives Analysis

The Winnetka Park District proposes to install temporary chain-link fencing at Centennial Beach to comply with the Cook County Animal Control Ordinance, which requires off-leash dog areas to be fully enclosed. The fencing system will include short linear sections extending approximately 15 feet into Lake Michigan, with posts driven into sand and clay without concrete, excavation, or fill placement.

Purpose and Need

The project ensures that Centennial Beach can continue to operate as a safe, compliant off-leash dog beach for residents and non-residents while maintaining uninterrupted public shoreline access along Lake Michigan.

Alternatives Evaluated

A full range of alternatives was considered, including:

- No Action: Not practicable because it eliminates the off-leash dog beach.
- Offsite Locations: Nearby beaches are incompatible with dog-beach use and would require longer in-water fencing, causing greater environmental impact.
- Onsite Layout Modifications: Upland-only fencing, shorter waterward extensions, and above-ground barriers fail due to safety, non-compliance, or technological impracticality.
- Applicant's Preferred Alternative: Minimal in-water footprint, temporary construction, no fill, and full compliance with containment requirements.

Environmental Considerations

Because the project entails no discharge of dredged or fill material, environmental effects are limited to temporary placement of driven posts. No substrate modification, grading, or permanent lakebed disturbance will occur.

LEDPA Determination

The Preferred Alternative is the Least Environmentally Damaging Practicable Alternative, as all other alternatives:



- Fail to meet the overall project purpose, or
- Would result in greater aquatic impact, or
- Are infeasible due to logistical, technological, or land-use constraints.

Conclusion

The proposed temporary fencing project represents the minimal-impact solution required to maintain a compliant off-leash dog beach while preserving uninterrupted public shoreline access. This submittal satisfies the Corps' alternatives analysis requirements under the Section 404(b)(1) Guidelines and NEPA.



Alternatives Analysis

Centennial Beach Temporary Dog Beach Fencing Project LRC-2023-082

Winnetka Park District 225 Sheridan Road, Winnetka, IL 60093

Introduction & Purpose of Submittal

The Winnetka Park District (“Applicant”) submits this Alternatives Analysis in support of its Joint Permit Application for the Centennial Beach Temporary Dog Beach Fencing Project located at 225 Sheridan Road, Winnetka, Illinois. The intent of this document is to address the requirements of the Section 404(b)(1) Guidelines and the NEPA reasonable alternatives review, consistent with the Corps’ “Checklist for Preparing an Alternatives Analysis.”

This project involves no discharge of dredged or fill material into Lake Michigan, and the only in-water activity consists of driving temporary fence posts directly into beach sand and underlying clay to refusal, with no excavation, grading, or substrate modification.

STEP 1 – Purpose and Need

Need for the Project:

Centennial Beach has long served as a designated dog beach for residents and non-residents. In 2024, Cook County Animal Control communicated that dogs may only be allowed off-leash in areas that are fully enclosed. Compliance with this requirement necessitates construction of a temporary barrier that prevents dogs from bypassing the designated area.

Project Purpose:

To install temporary fencing at Centennial Beach to comply with Cook County Animal Control requirements and allow continued operation of an off-leash public dog beach while maintaining uninterrupted public shoreline access.

Basic Project Purpose:

To provide a safe, enclosed off-leash dog area adjacent to Lake Michigan. (Not water-dependent; fencing extends slightly lakeward only to prevent dog egress.)

Overall Project Purpose:



To install a temporary, minimally intrusive fencing system at Centennial Beach that creates a compliant off-leash dog area, maintains public shoreline access, minimizes aquatic impacts, and can be seasonally installed and removed (last 20+/- feet of fencing lakeward side).

STEP 2 – Identification of Alternatives

The Applicant evaluated a range of alternatives consistent with Corps requirements, including:

A. No Action Alternative: Do not install fencing; Centennial Beach would lose its designation as an off-leash dog beach.

B. Offsite Alternatives:

1. Other public beaches in Winnetka (Elder Lane Beach, Lloyd Beach, Maple Street Beach, and Tower Road Beach).
 - a. These locations were evaluated based on size, access, shoreline configuration, public use, lakebed conditions, and programmatic constraints.
2. Inland fenced dog park alternative
 - a. Would not meet the basic or overall project purpose (off-leash lakefront access).

C. Onsite Alternatives:

1. Alternative fence alignments entirely in upland areas (no lakeward extension)
 - a. Would not prevent dog egress into shallow water, making the enclosure non-compliant.
2. Reduced in-water fencing footprint
 - a. Moving fence posts closer to the water's edge or shortening the lakeward extension.
3. Modified fence construction types
 - a. Including above-ground weighted barriers or temporary mats, would not allow for the dogs to be contained within the boundaries.

D. Applicant's Preferred Alternative:

Install two parallel 4-foot chain-link fence lines extending lakeward from the existing steel seawall, with posts driven into sand/clay and no fill, concrete, or excavation, along with



pedestrian access gates at both north and south limits with double entry gates to meet Cook County Department of Animal and Rabies Control.

STEP 3 – Practicability Analysis

The Corps defines a practicable alternative as one that is available and capable of being done considering cost, existing technology, and logistics.

Below is a summary of practicability considerations.

Alternative A – No Action

Practicability Factor	Result
Cost	Practicable, but eliminates off-leash dog beach entirely
Technology	Not applicable
Logistics	Fails to meet need; non-compliant with county requirements
Conclusion	Not practicable because it fails the overall project purpose

Alternative B – Offsite Locations

B1: Elder Lane Beach

Immediately adjacent, but Elder Lane Beach is a high-use swimming and recreational beach and unsuitable for dog beach programming.

- Cannot safely separate dog use from swimmers.
- Conflicts with existing community recreational priorities.
- Would require in-water fencing (similar to Centennial or longer due to the length of the beach).
- Site not available for reprogramming under the current Winnetka Park Board Resolution 23-5-25.



Conclusion: Impracticable due to logistics, land use conflicts, and current Park District Resolutions.

B2: Lloyd Beach / Tower Road Beach/Maple Street Beach

These beaches have constrained footprints, limited upland space, recreational programming conflicts and significant boating/watercraft access areas.

- Off-leash dog programming incompatible with boat storage/launch functions.
- Requires longer fencing runs and potential greater in-water fencing requirements due to more open shoreline geometry.
- Major conflicts with existing park uses/programming
- None of these beaches have been established by the Park Board for this type of off-leash dog beach activity (which Centennial Beach is already).

Conclusion: Impracticable due to logistics and conflicts with existing public recreational needs.

B3: Inland fenced dog park

Does not meet the basic purpose (off-leash access to Lake Michigan).

Conclusion: Not reasonable under NEPA and not practicable under 404(b)(1).

Alternative C – Onsite Layout Modifications

C1: Fence entirely in upland (no lakeward extension)

- Dogs could bypass the fence by entering shallow water.
- Would not satisfy Cook County Animal Control enclosure requirements.
- Would not contain off-leash activity.

Conclusion: Fails logistics and purpose, not practicable.

C2: Reduce lakeward fence extension

- Less than 15 feet does not prevent dog egress in typical lake conditions.
- Safety and containment performance becomes unreliable.



Conclusion: Not practicable due to failure of overall project purpose.

C3: Weighted temporary above-ground fencing

- Not stable in wave action.
- Potential for flotation, displacement, or debris hazard.
- Would introduce artificial materials into surf zone during storms (greater impact).

Conclusion: Fails existing technology and logistics, not practicable.

Applicant's Preferred Alternative (D)

- Meets purpose and need.
- Minimizes aquatic footprint to only temporary driven posts.
- No fill discharged.
- No substrate alteration.
- Seasonal installation and removal.
- Maintains public shoreline access via gates.
- Currently recognized and approved by the Winnetka Park District by Resolution 23-5-25.

Conclusion: Practicable.

STEP 4 – Least Environmentally Damaging Practicable Alternative (LEDPA)

Because this project involves no discharge of dredged or fill material, the LEDPA determination focuses on:

- Minimizing the number of driven posts
- Minimizing lakeward extent
- Avoiding substrate disturbance
- Avoiding impacts to public use, habitat, and shoreline
- Maintaining existing hydrology and sediment transport

Environmental Comparison

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Alternative	Aquatic Impact Summary	LEDPA Consideration
No Action	No impact	Not practicable
Offsite beaches	Greater lakeward fencing Length required	Higher aquatic impact
Onsite upland-only	No aquatic impact	Not practicable; fails purpose
Reduced fencing	Potential dog escape; unsafe	Not practicable
Above-ground barrier	Risk of debris in lake; unstable	Greater impact
Preferred Alternative	Smallest possible in-water footprint; only driven posts; no fill	LEDPA

Because all other alternatives either fail practicability standards or result in greater aquatic disturbance, the preferred alternative is the LEDPA.

STEP 5 – LEDPA Conclusion

The Winnetka Park District concludes that the Temporary Dog Beach Fencing Project as proposed, consisting of two short sections of chain-link fencing extending approximately 15 feet into Lake Michigan, supported by driven posts with no discharge of dredged or fill material, represents the Least Environmentally Damaging Practicable Alternative.

- Provides the minimum in-water footprint necessary to meet public safety and regulatory requirements.
- Avoids any substrate removal, grading, or fill placement.
- Does not impede public shoreline access.
- Minimizes habitat disturbance compared to all evaluated alternatives.
- Can be removed seasonally, leaving no permanent structures.



In conclusion the Winnetka Park District respectfully requests that the U.S. Army Corps of Engineers determine that the proposed action complies with the Section 404(b)(1) Guidelines and qualifies for authorization.