

INTRODUCTION

Preserve Historic Sleeping Bear has been a non-profit partner of Sleeping Bear Dunes National Lakeshore since 1998. Our mission is to assist the Lakeshore in preserving and saving the historic structures and cultural landscapes in Sleeping Bear Dunes National Lakeshore to provide a window into the past, and opportunities for recreation, education and inspiration which these resources provide. As such, we have welcomed the opportunity to give input on the General Management Process since 2000, with a focus on the cultural resources, but with the understanding that natural and cultural resources can be in balance, co-exist and actually enhance each other.

Our comments today are consistent with those expressed previously by Preserve Historic Sleeping Bear in the first GMP process and over the past seven years, which articulates our desire and concern that management of historic resources in the Park be given equal priority with the natural resources; are accessible to varying degrees, and have the commitment from the Park to *allow* for the highest appropriate level of preservation, rehabilitation or restoration, with no possibility of return to nature other than lack of funding. Our comments reiterate what we see as the most desirable management zones (though the names of the zones have changed from 2002) and purpose statement to ensure that future generations will learn from and enjoy the wealth of cultural landscapes which this Park has to offer. Because we care deeply about these historic treasures, these suggestions are meant to cement their longevity in your plan and clarify terms that could be interpreted in a way detrimental to this goal.

Our board's discussion of Newsletter 4 in general was limited to management zones for cultural resources, and the immediate surrounding areas which may have an impact on these resources. As an organization, we do not endorse any alternative as it stands, but rather choose to build our own through our comments below. We will not be commenting at this time on other topics in Newsletter 4 such as picnic areas, the Benzie corridor, campgrounds, inland lakes, beach access or Bow lakes. While we will continue to consider the options and their ramifications for cultural resources, the following is our initial response of Newsletter 4.

GENERAL COMMENTS

Preserve Historic Sleeping Bear would first like to compliment the Park on a more easily digestible and well-designed Newsletter. We also appreciate the comparative chart available on your website. Clearly, the Park considered the opinions and comments from the public and organizations such as Preserve Historic Sleeping Bear in response to the 2002 GMP alternatives, as they prepared the current preliminary alternatives. The process, outreach, and care you have put into the General Management Planning is exemplary, and we believe not only evident to us but the public at large. Please know that we are supportive of the Park and its management team as you move forward in your task of balancing the wide range of visitor interests with the stewardship of cultural and natural resources.

Overall, we are pleased with the direction of this GMP, granting significantly broader recognition and value to the cultural resources, removing wilderness boundaries that crossed through these resources, and stating your intention to preserve as many as possible. We

would like all historic structures and elements to be preserved; some selected for rehabilitation and adaptive-reuse, and others restored and interpreted.

EXECUTIVE SUMMARY

- ❑ Amend the Enabling Legislation to include historic resources
- ❑ Revise the Purpose Statement to include historic resources
- ❑ Please provide more detailed maps that include all cultural resources
- ❑ Define for your readers, “available funds” in the Management Zones Notes area
- ❑ Remove “park priorities” in management zone language
- ❑ Remove “return to nature” entirely, or define as an option only given available funding
- ❑ Historic resources should be zoned for Experience History or Recreation, but not nature zone unless the “return to nature” option is removed. We have concerns about the method of prioritizing cultural resources for work
- ❑ We support wilderness designation on NMI, with the exception of noted areas for Experience History. We have added resources in the history zone not mentioned in any alternative.
- ❑ On SMI, we support Recreation Zones surrounding the Experience History Zones noted in our comments to allow for rehabilitation and better access to cultural resources

NARRATIVE

Suggestions for Newsletter Improvement:

We do have a concern regarding the maps in Newsletter 4. These maps do not give the public a clear and accurate picture of the extent of cultural resources in the Park, other than the main fundamental resources areas (Port Oneida, Glen Haven, lifesaving station/complex on North and South, and light house on South,. Using the map as a guide, the public would be unaware of the historic resources in the Good Harbor (such as the Bufka/Kropp/Eitzen Farmsteads) and Platte Bay Units nor the full extent of resources on the islands. This could mislead one to believe there are no cultural resources outside of those specifically mentioned on the maps, affecting their comments for management. This leaves a need for educating the public on these other areas and their potential fate to the Park through their other venues, and organizations like Preserve Historic Sleeping Bear. Without this knowledge, one could inadvertently provide comments that contradict one’s own desires. For example, those that desire a nature zone, yet also support historic rehabilitation, may unknowingly provide comments that support a nature zone where the historic properties exist and have potential for rehabilitation. Perhaps this will come in the next round, but we would ask for more detailed maps of cultural resources so that the public can provide the Park with a truly educated, and more informed picture of what they would like to see in the Park and how they wish to access and experience it.

PURPOSE STATEMENT AND ENABLING LEGISLATION (bold added)

Sleeping Bear Dunes National Lakeshore has attained considerable knowledgeable about the historic structures and landscapes within its boundaries since the Park was established. The enabling legislation for which the park was established is now clearly out of date. Significant historic features in quantity and quality have been identified and evaluated through

information acquired over the past 30 plus years that justify a change in the enabling legislation and Purpose statement that should embrace these resources in your care.

1. To ensure the highest level of protection of cultural resources in the Park for years to come, Preserve Historic Sleeping Bear supports amending the enabling legislation of the Lakeshore to include cultural resources. We are not suggesting the optimum time to propose this, whether during the GMP process or at a subsequent time. However, we recommend that the Park seek commitment to take this action to best secure these cultural resources into the future regardless of fluctuations in management staff.

And/Or

2. Preserve Historic Sleeping Bear strongly recommends that the Purpose Statement also reflect an awareness, acknowledgement and importance of the cultural resources in the Park as seen in previous Purpose Statements. The Purpose Statement of Newsletter 4 lacks any acknowledgement of these cultural resources. If it is possible to change the Purpose Statement without changing the Enabling Legislation, this may suffice; however, we have been informed that this would not be allowable.

The current Enabling Legislation reads:

“Congress established Sleeping Bear Dunes National Lakeshore to: Preserve outstanding natural features, including forests, beaches, dune formations, and ancient glacial phenomena in their natural setting, and protect them from developments and uses that would destroy the scenic beauty and natural character of the area, for the benefit, inspiration, education, recreation, and enjoyment of the public.”

- We were more supportive of the language in Newsletter 1, 2006 which included, *“And then to: provide for recreational opportunities and protection of scenic, scientific, and **historic** features consistent with the maximum protection of the natural environment of the area.”*
- In addition, in newsletter 3, 2001, the Park states: *“Purpose statements represent the reasons the Lakeshore was established, and come directly from the lakeshore’s enabling legislation and **other laws**.... Much input has gone into improving the Purpose and Significance Statements presented in Newsletter 2. Following are the latest versions that are still referred to as preliminary, because you may still provide comments on them....”*
- And then this statement was added: *“Protect scenic, scientific, and **historic** features that contribute to the benefit, inspiration, education, recreation and enjoyment of the public.”* Obviously at that time, the Park saw this as an improvement.

As we understand it, other laws and studies that justify changing the purpose statement and/or enabling legislation include:

- Section 6(b)2 of the National Lakeshore’s enabling legislation called for the development of a management plan that provides for the “protection of scenic, scientific, and **historic** features contributing to the enjoyment of the public.”
- **1916 Organic Act**, which states the National Park Service’s mandate to, “conserve the scenery and the natural and **historic** objects and the wildlife therein and to

provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”

- **National Historic Preservation Act** which indicates the importance of the National Park Service’s role as stewards of cultural and natural resources. This increasing recognition of cultural resources and parity with natural resources is evident in several NPS reports, guidelines and publications. In addition to the National Historic Preservation Act, the *1997 Cultural Resource Management Guidelines* and the *NPS Management Policies 2001* which refers to “the authority and responsibility for managing cultural resources in every unit of the national park system so that those resources may be preserved unimpaired for future generations,” are just two examples.
- **Four studies** completed on the cultural resources within the Sleeping Bear Dunes National Lakeshore and commissioned by the National Park Service include: “A Garden Apart: An Agricultural Settlement History Of Michigan’s Sleeping Bear Dunes National Lakeshore Region,” 1994; “Farming At The Water’s Edge,” 1995; “Coming Through With Rye,” 1996; and “Tending a ‘Comfortable Wilderness.’” 2000.

THE ALTERNATIVES

The primary point Preserve Historic Sleeping Bear would like to convey is that no cultural resources on the mainland or on South Manitou Island should be in the nature zone as this zone is currently defined, as it would not allow the flexibility of potential modern adaptive-use. Although we do recognize that conceivably some resources in the nature zone could be used as primitive adaptive-uses that might provide shelter or storage, as examples, without rehabilitation. Therefore the nature zone, while not supporting rehabilitation, would allow for adaptive-use.

Available Funds and Priorities

Each management zone refers to the Lakeshore’s intent to preserve and protect natural and cultural resources to the greatest extent possible “given **available funds and park priorities.**” We applaud and obviously support the Park’s stated, and more importantly, demonstrated intent, to preserve and protect all historic structures and cultural landscapes. It’s the last part of the sentence that gives us some concern - how the priorities are determined, and how the funds are used.

□ Funds

While we understand better than most the difficulty of obtaining funds for historic preservation in the Lakeshore, we would like clarity in the next newsletter, perhaps under Management Zone Notes, that available funds refers to funds within the Park, as well as looking outside to existing and potential partnerships and volunteers that could provide financial and other types of assistance. Indeed, Preserve Historic Sleeping Bear was formed when the public learned that due to lack of available funds, the Park was removing and “returning to nature” cultural resources and did not look outside of itself to solicit or encourage the assistance of partnerships. Preserve Historic Sleeping Bear would like to ensure that this scenario has no possibility to be repeated. **With cultural and natural resources having equal priority – we need to be assured that funding will be applied equally to cultural resources given the money available.**

□ **Park Priorities**

- The treatment of cultural resources is “based on fundamental park resources, National Register significance, documentation condition, interpretive value and suitability for park operations.” In each management zone the Park has identified fundamental resources, which in the case of cultural resources is specifically Glen Haven, The Port Oneida Rural Historic District, the Lifesaving Complex on NMI, and the Lighthouse on SMI. This implies that park priorities could leave out historic structures that are not fundamental resources – which is a large number.
- We concur with the State Historic Preservation Office in their letter to the Park dated, September 19, 2001 that states: “We believe the management plan should call for the retention of **all** cultural resources. [bold **not** added] It should address appropriate uses and encourage partnerships and adaptive reuse for properties for which NPS itself has no use.”
- As a board, we have not discussed the method of prioritizing but intend to do so in the future as this is a critical aspect of treatment for cultural resources in the Park and relates directly to the GMP alternatives. We are concerned that given the limitation of funds, the Park may put money into those that qualify as fundamental resources, and work on the remainder only if funding is available which may result in the loss of structures. We question if the priority shouldn’t be rather, to ensure that all structures are saved - stabilized - so as not to lose any, followed by rounds of increasing upgrades, giving priority at that point to those fundamental resources. This method would establish condition as the priority, followed by the significance (ie: fundamental resources). In this scenario, the priority would provide at least minimal stabilization on all properties to preserve as much of the story as possible, but if the condition of the structures were essentially equal, fundamental resources would receive priority. Relative to this discussion are the materials used for stabilization, which is a financial issue. We would like to see non-historic materials used only for rehabilitation, or as temporary measure until such funds are available to give proper treatment that are in line with the SHPO and Secretary of Interior standards.

Remove “Park Priorities”

Does park priorities refer to how cultural resources fare in competition with other Park needs? Or does it refer to ranking cultural resources to determine which will be saved first - within the context of cultural resources having equal priority with natural resources?

If it is the former, we would like to see the phrase “park priorities” removed since we have been repeatedly reassured by the Park that only time and resources would jeopardize the preservation of the cultural resources, and that cultural resources are a priority. We also understand the terms “to the extent possible” as it relates to funds available (from various sources within and without the Park). However, we would like to see the Park state that preservation is limited only by funds across the board rather than by Park priorities.

If “priorities” is referring to the latter, we would again refer to our concerns stated above regarding stabilization for the broadest scope of work.

Clarify Conditions for “return to nature”

Given the current wording, we are left with the impression that resources could molder in the recreation and nature zones if park priorities dictated such treatment based on documentation,

condition and significance. Since it's highly unlikely that all cultural resources in the Park could be in Experience History Zone, we would like to suggest recreation zones for some areas where cultural resources exist, but are hesitant to do so given the "return to nature" option. We would like to see a statement from the Park that a "return to nature" is only due to money constraints and not policy. Return to nature is not a treatment but rather neglect, and is unacceptable to us for any reason other than funding limitations.

These recommendations are not comprehensive but outline some specific areas:

SMI

- Experience History Zone— for entire village area including U.S. Life Saving Service Station/Ranger station; visitor center; Lighthouse complex; Farm loop
- All other historic resources including Beck and both Hutzler farms; Sheridan and Haas Farms and surrounding areas we suggest the Recreation Zone. This will allow bike and horse-drawn wagon tour access limited to historic areas and natural attractions such as the large cedars to be considered;
- Allow rehab for interpretation and/or for compatible adaptive use
- The remainder of the island where no cultural resources exist we recommend nature zone to best preserve the dunes area from too much recreational foot traffic and preserve the pastoral scenery that island settlers experienced
- Trails on the island should be maintained to allow hiking explorations
- We support management of cultural resources and landscapes as recommended in "Coming through with Rye" including a proposed South Manitou Island Historical Agricultural District, preservation of all historic structures and maintenance of historic fields.
- Do not close off the farm loop

NMI

- Strongly supports the Park's inclusion of Cottage Row (National Register eligible) in its entirety, and the life-saving service station complex (NHL), in the Experience History Zone and the exclusion of these areas from Wilderness designation.
- We also want to include the Katie Shepherd Hotel, the MIA sawmill and barn, the MIA west-side barn, cemetery, Bourniques Complex, and the Frederic Beuham Orchard (all recommended for National Register Listing) - in the Experience History Zone which allows for the broadest spectrum of preservation possibilities.
- Wilderness boundaries should encompass the remainder of the island as in alternative C with exclusions noted above to provide a wilderness experience in the Park.
- Maintain trail systems
- Cultural resources in Wilderness need to be maintained
- Allowing day trips a few days a week to North could positively impact the ability to attract partners, maintain the resources, provide access to the Lifesaving Complex which is a National Historic Landmark, and implement adaptive use partnerships. We believe that day use can be effectively managed and not be in conflict with the wilderness experience but would like to hear arguments against this.

Wilderness

Again, we support wilderness on North Manitou Island with the exceptions as noted above. We understand from the NPS management policies of 2001 that the Park has the "responsibility for managing cultural resources in wilderness" and that it is not optional. We appreciate Sleeping Bear's encouragement and demonstration of this treatment. We do not

support wilderness designations on SMI or the Good Harbor Unit. We have not specifically identified other areas for wilderness. Our broad statement again, is that cultural resources on the mainland should not be in nature zones.

GOOD HARBOR UNIT

The Bufka/Kropp/Eitzen farmsteads in this unit are only suggested as nature or wilderness areas in the preliminary alternatives. The Bufka farm is one of the most picturesque and intact site of the three farmsteads. We strongly recommend a management approach that would maintain all the structures on the farmstead and continue to maintain the adjacent open field. All three sites should be included in the Experience History Zone. We do not support this area as wilderness. Further, the area between Port Oneida and the Good Harbor Unit, particularly on the south side of M-22, should be zoned in whatever way that will allow for maintaining the historic fields there that contribute to Port Oneida's farms.

North Unity School should also be in the Experience History or Recreation Zones to allow for rehabilitation if desired.

PLATTE

Tweddle/Treat and the Tweedle Schoolhouse should be included in the Experience History zone.

Boekeloo – Recreation Zone

Ken-Tuck-U-Inn – Recreation Zone

Esch – Recreation Zone

PORT ONEIDA

The Park has come a long way since the 2002 effort, in recognizing the significance of the Port Oneida Rural Historic District to now be counted among your fundamental resources in the Park. We are grateful that proposed wilderness designations have been removed entirely from this area in all alternatives and is rightly placed in the Experience History Zone in each alternative.

SLEEPING BEAR UNIT

Glen Haven, Maritime Museum – Experience History Zone

Benzie Corridor and Bow Lakes

Although we have no opinion on the alternatives for this area as of yet, it would be helpful to know if there are cultural resources in the corridor.

In general, we strongly support preservation of the surrounding natural resources for their own value, and for the natural backdrop and contributing landscapes they provide for the cultural resources, rather than see these areas become high visitor use areas with development. We are interested in details as the plans develop where we can comment on things like parking issues in Experience History Zones.

Given the Park's desire to save all the historic and cultural resources in the Park, we understand money to be the key element as it relates to our concerns, with the exception of the purpose statement and enabling legislation that will guide the future of the park. Preserve Historic Sleeping Bear would like to be as helpful as possible by securing a greater amount of funding which would make many of our concerns and yours, moot points.

We thank the Park for the wonderful job they are doing in managing resources and visitor experiences and the opportunity to partner with you, and look forward to reviewing and commenting on your next newsletter.