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PRESERVE
Historic Sleeping Bear
Preserving historic structures and cultural landscapes
In Sleeping Bear Dunes National Lakeshore

June 16, 2008

Sleeping Bear Dunes National Lakeshore
Attn: Superintendent, Dusty Shultz
9922 Front St.
Empire, MI 49630

Dear Superintendent Shultz,

Preserve Historic Sleeping Bear is pleased to provide comments on the Park's General Management Plan Preferred Alternative. Overall, we are happy with the direction that the Preferred Alternative takes in regards to the preservation of the Park's cultural resources. We feel that this alternative is a sincere attempt to balance the many facets of the Park and thank the Park for its dedicated stewardship. We do however, continue to advocate strongly for some specific changes that we feel will improve the plan and ensure preservation of cultural resources into the future. Preserve Historic Sleeping Bear provided verbal comments during the Glen Arbor public meeting, as well as written comments on the website. This response supersedes those comments.

Over the past ten years since Preserve Historic Sleeping Bear's inception, we have consistently advocated for equal priority of the Park's historic and natural resources as a result of understanding the unique collection of historic elements in the Park's care. We would like all historic structures and elements to be stabilized, some selected for rehabilitation and adaptive-reuse, and others restored and interpreted. In addition, we support the preservation of a good representation of cultural landscapes.

SUMMARY

Our primary concerns and thoughts related to the preservation of historic resources in the Park are:

- 1) That the Enabling Legislation should be amended to include historic resources.
- 2) That budget decisions regarding the percentage of Park resources invested in historic preservation be in line with and evidence of, the Park's stated intent to save all of its historic resources.
- 3) That the Purpose Statement should be changed to reflect acquired knowledge regarding the quantity and quality of cultural resources, so that there is no opportunity to

misinterpret, due to lack of clarity in the GMP, the stated intent to save all of the cultural resources.

- 4) That there be a full accounting of all historic resources, and that all that have been identified as significant be included on the list of “Fundamental Resources”.
- 5) That the new Asset Management Plan in the National Park Service not be allowed to hijack and/or thwart the good planning and preservation efforts that have been and will be invested in Sleeping Bear Dunes National Lakeshore’s historic assets.
- 6) Wilderness boundaries - we support wilderness designation on NMI, with the exception of noted areas for Experience History. We would question the need for Wilderness areas on SMI around cultural resources and would specifically request wilderness boundaries removed around specific resources.

Enabling Legislation and Purpose Statement

We strongly reiterate our statements from 2007:

Enabling Legislation

“Sleeping Bear Dunes National Lakeshore has attained considerable knowledge 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.”

While our preference remains that this legislation be amended, we acknowledge that Preserve Historic Sleeping Bear has been assured by Park Management, that other language, policies and acts*in the GMP anchor the safe-guarding of historic structures in the Management Plan in the likely event that the Enabling Legislation is not amended.

*

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 thee 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 of 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 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.

Purpose Statement

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 suggested in Purpose Statements offered in earlier Park newsletters throughout this current GMP process. The Purpose Statement in the Preferred Alternative lacks any acknowledgement of these cultural resources.

Our greatest concern is that given the wording of the proposed Purpose Statement of Sleeping Bear Dunes National Lakeshore, and limited funding, Park management may be putting limitations on their own ability and authority to give cultural resources equal priority with natural resources within the Park. In addition, the Park may be at a disadvantage, and consequently be less successful at competing for Federal dollars for cultural resources if these policies do not indicate the preservation of these resources as an important aspect of this Park.

At a minimum, PHSB encourages the Park to highlight and make more prominent the 1916 Organic Act which provides the fundamental management direction for all units of the National Park System. Again, Preserve Historic Sleeping Bear has been assured by the Park that other language, policies and acts in the GMP anchor the safe-guarding of historic structures in the Management Plan though they acknowledge that the Purpose Statement would indeed add another layer of protection.

Full Accounting of Resources

We continue to have some concern over the definition of Fundamental Resources in the GMP, which it appears, may drive what may or may not be preserved. While certainly understanding the need to prioritize historic features in the Park through use of this definition, it appears that some structures and landscapes with significance have been left off from this list. For example, the Beuham Orchard on North Manitou has been identified by Mr. Alanen, author of “Tending a Comfortable Wilderness” as being a significant landscape, as well as Cottage Row and the Bourniques. We would imagine that the Park would want to include any structures that historians have designated as significant.

We also have some concern about how the Fundamental Resource list will be used. We would suggest it come into play to determine priorities after all of the structures have been first stabilized. The method of prioritizing preservation projects is a critical aspect of treatment and relates directly to the General Management Plan. We are concerned that given the limitation of funds, the Park may put money only into those identified as fundamental resources (which again, should include any of designated or potential significance) and work on the remainder

only if funding is available which may result in the loss of structures. This begs the question of methodology. We would ask 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 of treatment, giving priority at that point to those fundamental resources. This method would establish condition as the priority followed by the significance (ie: fundamental resources). The priority would be to provide minimal stabilization on all properties to preserve as much of the story as possible, and then priority would be given to fundamental resources for further preservation. Hopefully, this detail will come in the Historic Properties Management Plan.

Partnership and Funding

Preserve Historic Sleeping Bear was formed when the public learned that due to lack of available funds, the Park was removing and allowing moldering of cultural resources and initially made no effort to solicit or encourage partnership assistance until there was public outcry. Thank you for the strategy proposed in the GMP to, “Continue to establish and foster partnerships with public and private organizations ...to achieve the purposes and mission of Sleeping Bear Dunes National Lakeshore.” Certainly, current management fully endorses this strategy. And while as a Park partner we understand the difficulty of obtaining funds to assist the Park in this way, we would ask again, in an effort to tie this strategy together with discussion about “available funds” used in reference to the Park’s ability to preserve all structures, that the Management Plan clarify “available funds” as funds within the Park as well as *partnership resources*. This provides a uniform directive and requirement that management seek out partnership assistance prior to determining removal or moldering as treatment of historic resources as suggested possibilities in the Asset Management Plan.

ZONING

Mainland

We appreciate that most cultural resources have been removed from the Experience Nature Zone which will allow for the flexibility of potential modern adaptive-use. As an example, it appears that the Bufka, Eizen and Kropp Farms, and the Unity School are now zoned Recreation. While Preserve Historic Sleeping Bear is certainly not advocating for the adaptive use of all of these structures, or even any necessarily, this zoning allows the option, should a suitable and desirable partner emerge. We would like to also suggest that the zone around structures in the Good Harbor unit represent the cultural landscape rather than just the structures. We support the Preferred Alternative’s zoning of the Boekeloo Cabin in Recreation Zone as we foresee this historic log cabin as ideal for a ski/hike in destination. We support your removal of wilderness from the Good Harbor Unit, Boekeloo and Treat Farm.

South Manitou Island

On South Manitou Island, we support the following offered in the Preferred Alternative:

- Access to the giant cedars.
- Keeping the farm loop open

We recommend the following changes on South Manitou

- That the Theodore Beck and both Hutzler farms; Sheridan and Haas Farms be excluded from wilderness which approximates more closely the proposed boundaries suggested in Alternative C on South Manitou.
- 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 select historic fields.

North Manitou Island

On North Manitou Island, we support the following offered in the Preferred Alternative:

- 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.
- Allowing day trips a few days a week.
- Again, we support wilderness on North Manitou Island with the exclusions 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 recommend the following changes on North Manitou:

Consider including the John Newhall cottage in the Experience History Zone and out of wilderness.

Again, our board’s discussion of the Preferred Alternative did not comment specifically on other topics such as picnic areas, trails, the Benzie corridor, campgrounds, inland lakes, beach access or Bow Lakes.

We appreciate the difficulty of your task in weighing natural and cultural resource preservation and visitor services. We feel that if the above recommended changes were adopted, the Preferred Alternative is one that Preserve Historic Sleeping Bear would be extremely happy with. Thank you so much for all of your dedicated efforts to preserve the beautiful natural resources and cultural legacy of Sleeping Bear Dunes National Lakeshore.

Sincerely,

Susan J. Pocklington
Director
Preserve Historic Sleeping Bear