

November 14, 2005

Ms. Dusty Shultz, Superintendent
Sleeping Bear Dunes National Lakeshore
9922 Front Street
Empire, MI 49630

RE: *EA for the Port Oneida Rural Historic District*

Dear Superintendent Shultz:

Stabilization, rehabilitation and interpretation of cultural resources in the Port Oneida Rural Historic District are primary goals in achieving Preserve's mission in partnership with the National Lakeshore. Preserve's leadership was thrilled to hear of the funding available for this planning project and we appreciate the opportunity to comment.

Your letter of September 20, 2005, states that "the purpose of the Project/EA is to explore the various ways in which the NPS might stabilize and rehabilitate historic structures and landscapes in the District, while enhancing visitor access to interpretive and recreational opportunities." Further you specifically request ideas on how to best preserve the structures and landscapes, on how to provide opportunities to understand and enjoy them, and on impacts and issues we think you should consider. To that end, we offer the following comments:

- Preserve recommends that the National Lakeshore initiate and complete the process to nominate the Port Oneida Rural Historic District for the National Register at the national level of significance.
- Preserve has consistently stated that it does not support wilderness designation in the Port Oneida area. We recommend that:
 - Cultural resources within potentially designated wilderness be considered and assessed equally with resources outside of the potential wilderness,
 - Cultural resources in wilderness are not automatically given a lower priority for stabilization or rehabilitation than resources outside of potential wilderness boundaries; and
 - Historic agricultural landscapes, the overall setting of the structures, plantings and fields, be considered for rehabilitation within and outside of potential wilderness.
- We encourage NPS to engage Preserve and other existing and potential partners in the planning process, perhaps in a charrette process with the NPS consultants and the National Lakeshore:
 - To assist in the identification of priority structures for stabilization and rehabilitation,
 - To recommend and evaluate potential adaptive use scenarios for farmsteads throughout the District;
 - To provide comments and recommendations on the development of trails and interpretive exhibits; and

- To provide input into decision making with regard to the location and impact of visitor use facilities.
- Preserve expects that recommendations for treatment, adaptive use, recreational and educational use and visitor services will take into consideration the defining characteristics of the resources and the potential impact on those resources.
 - Each farmstead through the integrity of its remaining structures and agricultural setting; its visibility along a paved road, or its remoteness; its relationship to a highway, a gravel road or a two-track; its site and family history; its relationship to the surrounding topography or to the lakeshore, and its place in the overall Port Oneida cultural landscape is unique.
 - While Preserve does not support wilderness in the Port Oneida area, we recognize that the farmsteads represent a range of character and ability to tell a story. For example, the remoteness and character of the Martin Basch farmstead as compared to the visibility and character of the Kelderhouse site should be factored in to treatment, adaptive use, interpretation and visitor use recommendations.
 - Preserve has initiated its own efforts to interpret the Olsen House, the Port Oneida Rural Historic District and the cultural landscape of Port Oneida and we are very supportive of the interpretive component of this project.
 - Preserve would expect that the environmental assessment would develop and assess scenarios for adaptive use, recreation, interpretation and visitor use that are context sensitive to the historic and natural environment.
 - While Preserve's mission and goals support stabilization, rehabilitation, adaptive use partnerships and interpretation, Preserve's intent in so doing is to strike a balance that is highly sensitive to the natural and cultural environment and the quality of the visitor experience.
 - Preserve sees the principal challenge for the Project EA as one of preserving and enhancing the quality and character of the District, and enhancing the visitor experience while minimizing adverse effects.
 - As an example, the location, visibility, ingress and egress, size and surface of the parking lots is a significant issue. The location and type of trails; the size, design and location of exhibits and signage should improve the visitor experience. All of these actions will necessarily alter the landscape and could detract from the quality and character of the District and from the visitor experience.
- If viable within the scope of the EA, Preserve recommends that the project be developed to maximize the funding for implementation with regard to structures and landscapes.
 - Considerable effort has been undertaken in the past by the Sleeping Bear Dunes National Lakeshore and Preserve Historic Sleeping Bear to identify historic structures and prioritize the stabilization and rehabilitation of historic structures in the District.
 - Preserve recommends that we fully utilize existing planning documents, and to the extent possible, channel funding to effective and efficient implementation by the Lakeshore, consultants, contractors and in partnership with Preserve and other existing and potential partners.
- Without a Comprehensive Interpretive Plan in place in the Lakeshore, Preserve has some concern as to in what context the wayside exhibits (interpretive signage) are being developed; what are the themes, what are the stories to be told.

- Preserve recommends that opportunities be explored to utilize the findings and recommendations of the Port Oneida Cultural Landscape Interpretive Model developed for Preserve by Mark Livengood, Ph.D., and funded by the Americana Foundation.
- Preserve has funding from the Michigan Humanities Council, the National Endowment for the Humanities and the Americana Foundation to develop Phase I of an exhibit and develop a cultural landscape walking trail brochure.
- Preserve has worked in partnership with the National Lakeshore with regard to these interpretive efforts, to date. However, at present, we do not understand how these efforts can and will be coordinated with the EA and the project.
- Preserve encourages NPS to fully engage Preserve in the interpretive planning portion of the project to coordinate plans and interpretive content to maximize the use of limited funding for interpretive implementation, and perhaps utilize the planning process to provide a framework to access additional implementation funding.
- Preserve would expect that the EA and the project comply with the appropriate Secretary of Interior Standards.

We again thank you for the opportunity to provide comments. We look forward to working with you on the Project EA.

Sincerely yours,

Lanny Sterling, Chairman

cc: Brian Conway, MI SHPO
Nancy Finegood, MHPN
Brian Price, Leelanau Conservancy
Hans Voss, MLUI