

Preserve Historic Sleeping Bear
Wilderness Designation and the General Management Plan
September 3, 2002

The following comments are excerpts from Preserve's response to wilderness issues and the new general management plan as was being developed in 2002. Preserve is aware that the process has been reopened by the National Lakeshore and the National Park Service to address wilderness designation and to develop a new general management plan. Preserve looks forward to engaging in this effort and will make our comments available to our membership and supporters through this website. All references are to the final preferred preliminary alternative for the general management plan that was presented to the public in 2002 in Newsletter 4.

THE STATUS OF WILDERNESS AT SLEEPING BEAR

Background Section of Wilderness Status

- In listing the bullets for management direction in column one – **there is no reference to the management of cultural resources in wilderness.** There is reference to *NPS Management Policies 2001* and Preserve recommends adding language drawn from these policies regarding cultural resources just as was done regarding natural resources.
- According to *NPS Management Policies 2001*: “Cultural resources that have been included within wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources, using management methods that are consistent with the preservation of wilderness character and values. These laws include the Antiquities Act and the Historic Sites, Buildings and Antiquities Act, as well as the subsequent historic preservation legislation, including NHPA, ARPA and NAGPRA. The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation projects provide direction for protection and maintenance.” [page 68]
- “Taken collectively (referring to laws & regs), they provide the service with 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.” [page 48] It is significant that these policies state that both cultural and natural resources should be managed so that these resources are unimpaired for future generations.

Wilderness and the GMP

- Preserve takes issue with the decision to not consider minor changes to the proposed wilderness boundary in the preferred alternative. Preserve does not agree with this approach and believes that minor changes in the proposed wilderness boundary are necessary, appropriate and that it simply makes good sense. (**Note: the National**

Lakeshore is now revisiting the boundaries of wilderness and potential wilderness.)

- Preserve continues to advocate for a minor change to the proposed North Manitou wilderness boundary. The drawing of a proposed boundary right through Cottage Row, right through a National Register Historic District [whether eligible or listed] does not make sense in light of the minor boundary change required. Moreover, it is our view that if a professional evaluation were conducted today the boundary would not be drawn through Cottage Row.
- Preserve is concerned that cultural resources within the proposed boundaries on South Manitou and in the Good Harbor Unit will be negatively impacted by the boundary through limitations accompanying wilderness designation and management approach as presently stated in Newsletter 4. It is difficult to be specific about the cultural resources of concern because the borders of the boundaries are irregular and the map of insufficient scale to determine what cultural resources are in or out of proposed wilderness.

PURPOSE & SIGNIFICANCE STATEMENTS

- Preserve finds that the Purpose and Significance Statements of Newsletter 4 lack sufficient acknowledgement and importance of the cultural resources. We were more supportive of the language in Newsletter 3 and find the current statements, with respect to cultural resources, watered down in comparison to the natural resources. **(Preserve understands that the National Park Service has accommodated this concern in the purpose & significance statements being developed for the most recent general management plan process.)**
- The priority placed on historic and natural resources is the very foundation of the National Park Service as created by Congress through the 1916 Organic Act, U.S.C.1. In reference to this act, the NPS website states, “By law, the National Park Service is mandated 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.”
- Since the passage of the National Historic Preservation Act in 1966, the importance of the National Park Service’s role as stewards of cultural and natural resources has been increasingly acknowledged. This increasing recognition of cultural resources and parity with natural resource 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* are just two examples.
- National awareness and support of cultural resources is also evident in the media and through the support of organizations such as, the National Trust for Historic

Preservation, the Natural Resources Defense Council, the National Parks and Conservation Association and Preserve Historic Sleeping Bear.

- Section 6(b)2 of the 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.” Over the intervening years between the passage of the enabling legislation and the development of the current GMP, the milieu has changed and much has been learned about the historic features. This knowledge should be incorporated into the foundation of the plan.
- From 1994 to 2000, four studies have been completed on the cultural resources within the Sleeping Bear Dunes National Lakeshore; all of the studies were commissioned by the National Park Service. These studies 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.
- Preserve recommends that the Purpose and Significance Statements reflect more awareness, acknowledgement and importance of the significant historic features that have been identified and evaluated through the scholarly information acquired in the above listed reports.

North Manitou Island Unit

- Ferry service and Day Trips – Preserve supports the increased ferry service and day trips, which will positively impact the ability to attract partners, maintain the resources and implement adaptive use partnerships on Cottage Row. We believe that day use can be effectively managed and not be in conflict with a wilderness experience in the Primitive Zone.
- Cottage Row – Preserve is both appreciative of and strongly supports all of Cottage Row being included in the Cultural Landscape Zone. However, the proposed wilderness boundary cuts through Cottage Row and the narrative states that those Cottage Row structures within the boundary will be managed by wilderness policies. It appears access and use would be more limited for that portion of the historic district and this is of concern to Preserve.
- Proposed Wilderness Boundary - It is Preserve’s view that a bit of common sense is called for with respect to wilderness on North Manitou. When a visitor approaches North Manitou – a rather massive modern dock and breakwall, a solar panel array, and a non-historic cement block building are readily visible in addition to the Life Saving Station and Cottage Row. The reality is that any potential wilderness experience does not and will not commence until one leaves the village area.
 - In addition, through research conducted for the National Lakeshore, “Tending A ‘Comfortable Wilderness,’” there is ample evidence that there is a “wilderness myth” associated with North Manitou. The island has been logged over at least

- twice; at one time there were major logging operations on the east and west sides of the island; there were populations of 270 and 400 in different stages of development; and there was considerable agricultural activity and production.
- However, PHSB substantially supports the majority of the island being zoned Primitive. North Manitou is probably the only area of the Lakeshore wherein the visitor can have a wilderness or near wilderness experience once they leave the village area.
- The Borniques Complex, the Frederic Beuham Orchard, and the Manitou Island Association West Side Barn – These historic resources were recommended for National Register listing [Tending A ‘Comfortable Wilderness’], and all these historic resources are within the Primitive Zone and proposed wilderness boundary. The fate of these resources is unclear to Preserve and we seek clarification from the National Lakeshore. The written narrative in the Summary of Alternatives states, “historic structures would only be preserved if they do not conflict with the natural resource goals of the Primitive zone.”

South Manitou Island Unit

- Village Area – Preserve strongly endorses and supports the village area being zoned as Cultural Landscape, and concurrently supports the management treatment described in the narrative.
- Lighthouse Complex - Preserve strongly endorses and supports the Lighthouse Complex being zoned as History Education, and concurrently supports the management treatment described in the narrative.
- Farmsteads/Farm Loop - Conversely, Preserve strongly objects to the absence of a Cultural Landscape zone for the interior farmsteads. Indeed we are puzzled and concerned that the management approach in the PPA will allow further deterioration and limit access, especially in an area wherein three sites have been recommended for National Historic Landmark status. Preserve is very concerned with the statement, “historic structures and landscapes within the Backcountry zone, but not along the farm loop, would be allowed to molder.”
 - It appears that the George Johann and Margaretha Hutzler/John Hutzler Farm, which includes the Pig Barn [individually NR listed and NHL recommended], would be allowed to molder if not considered part of the farm loop.
 - Theodore & Alvina Beck farm will be allowed to molder – in 1996 buildings were deteriorated but house still salvageable
 - The James Sheridan/Aaron and Julia Sheridan/Henry and Maggie Haas Farm will be allowed to molder – site grown in, house all that remains.
 - The August Beck and George Hutzler farmsteads are the only site on the loop tour that have remaining buildings to be preserved and both were recommended for NHL status.

- The Thomas & Mary Kitchen/Mary (Kitchen) Price & Thomas Price/Andrew & Sarah Burdick Farm along the loop has structural ruins. The Alfred & Hannah Evans/Thomas & Estell Foster farm maintains some cultural landscape remnants.
 - All other farmsteads on the island except for those listed above were in ruins or with no extant features in 1996.
- “Coming Through With Rye” - Page 181 of this NPS study stated that 82 acres of a 145-acre historic zone were subject to open field management. “A comparison of these patterns to the fields that were present when the Lakeshore was established indicates that a large quantity of historically significant old fields are in danger of being engulfed by forest. The loss of these old field patterns could dramatically impact the overall integrity of the historic agricultural landscapes.”
 - “Coming Through With Rye” – This NPS study recommended a National Register district for the interior farmsteads; the PPA includes sites in that recommended district that would be allowed to molder or otherwise be overgrown and unrecognizable as a cultural landscape. The study also presented a series of management treatment options and cited a preferred management treatment.
 - PHSB Recommended Action – Preserve strongly recommends that the PPA be amended to reflect the recommended management option cited on pages 246 and 247 of its study, “Coming Through With Rye.”
 - We recommend that the National Lakeshore fully embrace and interpret the historic structures and agricultural landscape features rather than attempt to turn back the clock and manage the area as backcountry and wilderness.
 - Moreover, we would suggest that given the responsibility to manage cultural as well as natural resources, combined with in some cases NHL level of significance of these cultural resources, that it is inappropriate for the National Park Service to do anything less.
 - Lastly, the importance of access to experience and learn the story of these cultural resources is of utmost importance. We urge that considerable thought and creativity be enlisted to ensure a broad spectrum of the public can enjoy this cultural landscape unimpaired.
 - Wilderness Boundary - Given the scale of the map and the irregularity of the proposed wilderness boundary it is difficult for Preserve to determine impact. However, any concerns we might have about impact of cultural resources in proposed wilderness would be rendered moot if the previous recommendation is followed.

Good Harbor Unit

- Bufka/Kropp/Eitzen – Preserve is both appreciative of and supports the identification and management treatment of the Bufka/Kropp/Eitzen farms as a Cultural Landscape zone.
 - However, the proposed wilderness boundary is very close if not running through the Bufka farmstead, the map is of insufficient scale to determine if that is so.
 - The Bufka farmstead is the most picturesque and intact site of the three farmsteads in this cultural landscape zone. Preserve strongly recommends a management approach that would maintain all the structures on the farmstead and continue to maintain the adjacent open field.
 - Preserve recognizes that there is a practical consideration with respect to any adaptive use or visitor understanding at the Bufka farmstead because the present driveway is on an incline and sited on a curve of M-22.

- Port Oneida – Preserve applauds the PPA recognition and management of the entire Port Oneida Rural Historic District as a Cultural Landscape zone. In newsletter 3, there were alternatives that did not include the district or only a portion of the district as a cultural zone.
 - Olsen House - It appears that the Olsen House is included in one of the three Visitor Services areas within the Cultural Landscape zone, but it is not definitive. The Olsen House is mentioned specifically in the first bullet, but not when listing the sites in the first paragraph of the Good Harbor Unit narrative, clarity on this matter would be appreciated.
 - Visitor Services – Preserve supports the three Visitor Services zones within Port Oneida with the caution that it has never been preserves intention to highly develop all cultural resources in the National Lakeshore. In fact, Preserve’s leadership would strive to adopt a balanced plan that will ensure, 20 years from now, that its implementation maintained the quality and character of the natural and cultural resources.
 - Burfiend Farm – Preserve is very supportive of the American Youth Hostel’s mission. At the same time, we harbor some reservations regarding their potential location at the Burfiend farmstead. The Burfiend farm is a significant element of a pastoral, quiet setting, a 40-46-bed facility and related parking lot has the potential to be over developed an intrusive. Preserve would be open to dialog regarding our expressed concerns on this proposed use.
 - Events – Preserve is very supportive of events and would intend to conduct events at the Olsen House and support events at the Thoreson and Lawr farmsteads, as well as those of other partners. We would also hope that events would be limited in terms of frequency and managed to ensure as little conflict as possible with the natural resource experience.

- Proposed Wilderness Boundary – It is the case in Port Oneida as it is elsewhere that the scale of the map and the irregularity of the boundary make it very difficult to

determine what is and is not in proposed wilderness. As has been stated elsewhere, Preserve seeks clarity and more detail on what historic structures are in proposed wilderness and how those resources will be managed under wilderness policy. Based on previous experience with the National Lakeshore and language in Newsletter 4, Preserve fully expects that we may have a different view as to what is appropriate management of cultural resources under wilderness policy.

- Private Inholders/Category III Properties – While not specifically mentioned or addressed in the newsletter, Preserve believes it is important that the National Lakeshore begin to educate private inholders regarding the importance of historic structures and potential impacts of changes to their property on the cultural landscape.

Sleeping Bear Unit

- Glen Haven and Maritime Museum Complex – Preserve is very supportive of the delineation of these resources within a History Education zone, and supportive of the management treatment for this zone in the narrative.
- D.H. Day Kingdom – Preserve supports the D.H. Day Kingdom cultural landscape as proposed. Preserve's board of directors were curious as to how viable this approach for this signature farmstead is long term and what would happen if the current owner decided to sell.
- Carmichael House – Preserve has no objection to removing the Carmichael house.
- Sleeping Bear Inn – While not specifically addressed in the PPA, Preserve views the adaptive use of the Inn as an important element in the development and interpretation of Glen Haven. Preserve continues to offer its support and assistance to advance the adaptive use of this significant historic structure.

Bow Lakes Unit – It is Preserve's understanding that there are no cultural resources in this unit, thus no need for Preserve to comment. Preserve respectfully asks that the National Lakeshore confirm that there are no historic resources in the Bow Lakes Unit.

Empire Headquarters and Visitor Center

- Preserve recommends re-evaluation of this proposal and exploration of options to include the relocation of the interpretation and orientation functions with the administrative functions to remain in the current location. It makes perfect sense to Preserve for NPS to consider adaptive use of historic structures within our outside of the National Lakeshore.
- As an example relocation of some operations to the historic schoolhouse in Empire would be of very close proximity to the current headquarters' structure and save a vacant historic structure of value to the Empire community.

- In addition to being a good idea in our view, Executive Order 13006 and H.R. 2068 [awaiting President Bush's signature] set out requirements that federal agencies and GSA seek first to locate or relocate operations in historic structures.

Platte Unit

- This most southern unit of the Lakeshore has fewer cultural resources than other units in the park. Thus, those cultural resources within the Platte Unit are especially important for their ability to tell the story, the history to visitors from the Benzie County area.
- Ken-Tuck-U-Inn – Preserve appreciates and supports the identification of the inn as a Cultural Landscape zone, and supports the management treatment stated in the narrative. The location of the inn at the end of the southern unit, on M-22, and near the park boundary allows this site to be adaptively used with minimal or no effect on the primitive zone.
- Tweedle/Treat
 - Preserve supports this proposed cultural landscape zone and the management treatment in the narrative. The stabilization of the remaining resources at the Treat farm would allow visitors of the southern unit to have a quality nature experience, while also pondering questions, such as “What ever possessed someone to farm back here?, How did they do it?, and What was life like?
 - The Tweedle Schoolhouse appears to be within this cultural landscape zone, but it is not specifically mentioned in the narrative. Preserve would certainly recommend its inclusion and state that it is a natural for a partnership with an educational institution.
- Esch Farm
 - Preserve is basically supportive of the management treatment identified in the PPA for the Esch Farm. The property is eligible for the National Register for local significance and we would be respectful of any concerns expressed from the surrounding community, i.e. consternation that it is not identified as a cultural landscape.
 - Given the Esch farm's location and sighting, it is Preserve's view that farm provides opportunity for adaptive use and partnership with minimal impact on the viewshed and natural resource goals of the Platte Unit.
- Bookeloo Complex
 - The narrative states that the structures would continue to be preserved by NPS (once the use and occupancy expires). The narrative does not identify for what purpose. Preserve seeks more clarity and information regarding maintenance, use and long-term outcome for these historic structures.
 - As is the case with all historic resources in primitive zones, if there is only access by hiking trail how will the resources be maintained? To our knowledge this is

- the only log cabin structure of its type in the National Lakeshore. More broadly such simple cabins are becoming more rare throughout the region as well.
- The history of the Bookeloo Cabin is closely tied to the wilderness experience. Preserve would suggest that this resource presents a great opportunity to generate rent through a rustic wilderness experience for those in the literary arts.

Benzie Corridor – PHSB would like to know if there are any cultural resources that have been identified in the corridor?