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Response submitted May 1, 2007 by **Citizens for Access to the Lakeshore (CAL)** to the Comment Form of the **National Park Service's (NPS) March 2007 Newsletter 4** proposing a new **General Management Plan (GMP) for Sleeping Bear Dunes National Lakeshore**

THANKS: CAL thanks you for so many invitations for public input, including your newsletters, news releases, public meetings, excellent Web Site, special Web Site Forum, and your willingness to appear before groups any time of day. CAL also appreciates Newsletter 4's elimination of county roads from all wilderness proposed.

CAL'S PREFERRED ALTERNATIVE: With modifications, CAL's first choice would be Alternative B and our second choice Alternative C. Our reasons are two: the statutory purpose of the Park, and the unknown future interpretations of a wilderness designation, as explained below:

1. **STATUTORY PURPOSE:** CAL objects to an agency of the federal government coming up with its own "Overall Vision" for the Park when such was clearly established by Congress in the purpose statement of its 1970 enabling legislation. In CAL's view, it is appropriate for the Park Service to review and amend their GMPs from time to time, but the review question should be: does the current GMP still carry out in the best way possible the Park's statutory purpose, and if not, what changes should be made? But, without any authority to do so, Newsletter 4 proposes what, in effect, would be a replacement of the statutory purpose of the Park with one of three new "overall visions" quoted below:

Alternative A: "The Lakeshore is valued primarily for conservation of its natural resources."

Alternative B: "The Lakeshore is valued primarily for its recreational opportunities in scenic outdoor settings."

Alternative C: "The Lakeshore is managed in such a way that most visitor use is concentrated in selected areas, with more natural, primitive conditions promoted in the rest of the Lakeshore."

However, Congress long ago established the "overall vision" under which this Park is to be managed, e.g., the plain English, statutory "purpose" of this Park:

**"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."**

You already acknowledged the above in your May 2006 NPS Newsletter Two. So CAL respectfully asks why, two Newsletters later, these new Park Service-created "overall visions" are being proposed? And what is the result, but the following:

- Alternative A's "vision" is contrary to the Park's statutory purpose: Congress did not create the Lakeshore "primarily for conservation of its natural resources." If it had, it would have created a "Preserve" rather than a "Lakeshore".
- Alternative B's "vision" lacks any mention of Congressional purpose regarding the "preservation" of the Park's "outstanding natural features".
- Alternative C's "vision" is not a "vision", but a statement of agency intent to begin implementing its authority, explained on page 3 of the Newsletter, to manage "user capacity".

The true "overall vision" can only be the statutory purpose of the enabling legislation; only Congress has the authority to change the purpose or vision, not the Park Service.

2. WHY CAL RETAINS CONCERNS ABOUT TOO MUCH WILDERNESS DESIGNATION:

- Past and Future Wilderness Management: You have said frequently that half the Park has been managed as “wilderness” the past twenty years, and therefore, the public should be comfortable with it. However, during the past twenty years, the Park Service was prevented from full implementation of wilderness requirements because you did not yet have jurisdiction: many non-wilderness-conforming uses existed that the Park Service did not yet have authority to remove, so the impact of a “wilderness” designation was not apparent. Besides county-owned roads, those uses included private properties, buildings, homes, driveways, farms, orchards, historical buildings and private roads/trails with beach accesses. With the termination the last few years of many in-holders’ 25-year-leases, you have moved quickly to remove any and all evidence of the former inhabitants. CAL is not expressing criticism of such, only pointing out that there is a significant difference between what “wilderness” looked like the past twenty years and what it will look like the next twenty years.

- Unfortunate That New Map Will Not Replace 1981 Wilderness Map: CAL feels it would go a long way to resolving many current problems if one of the new Maps would actually replace the 1981 Wilderness Boundary Map. However, you have said that, despite the results of this new Study, the 1981 Wilderness Study, not the new one, will continue to be enforced where its strictures are not compatible with the new Study unless and until the U.S. Congress deems otherwise. Therefore, 1981 wilderness areas will continue to be managed as “wilderness”, despite the new Map, unless Congress intervenes. Also, since the 1981 Wilderness Study did not map out the county roads, it is only the jurisdictional authority of Benzie and Leelanau Counties over those roads that keeps them open, not any new NPS maps. The 1981 NPS Wilderness Study’s boundaries need to be removed and replaced with the new Study, but you have said it cannot not do so, because of a few lines in a 1982 law requiring you to manage the Park as if the 1981 Study had been Congressionally approved, which it never was. You have said that only Congress can remove the Park Service from that 1982 “mandate”. Yet whether future Park Service personnel would support the newer Study unequivocally in a Congressional setting is unknown. Also unknown is exactly who would provide the political support/pressure to push Congress to take all this action, as you have said the Park Service cannot perform such advocacy before Congress. It is also unclear if the Park Service is committing itself to keep open and maintain those roads for vehicular access if the counties do ever give up rights-of-way on any of them. What does appear clear is that there remain many contingencies and “if’s” before this perennial issue would be resolved permanently, and perhaps it never will be. CAL would have preferred a permanent solution with no contingencies. The end result on the county road issue does not appear a whole lot different from the past twenty years, e.g., as long as future county road commissioners remain constant, the roads will be kept open for vehicular access. However, the new Wilderness Study maps are a long-sought and much appreciated on-the-record acknowledgement from the Park Service of county jurisdiction.

- Access Needs “Protection” :
 - Given the history of previous NPS proposals to eliminate the Coho fish hatchery, close the county roads, eliminate auto access to the beaches, kill off the entire deer herd on North Manitou Island, “moulder” many historical and cultural resources, and
 - Given the “minimal” fire suppression techniques required in “wilderness”, and
 - Given the prohibition (*absent temporary exemptions*) against using any mechanized tools for historical preservation, and
 - Given that in 1987 that vehicles were suddenly and summarily prohibited from using most of the established county roads on South Manitou Island, and
 - Given that the Park Service announcement at the time proclaimed they were taking the action due to the threat of a lawsuit from the Sierra Club pushing the NPS to impose wilderness requirements against roads/cars in the 1981 wilderness-recommended areas on the Island,

CAL believes it has good reasons to remain concerned about interpretations future NPS personnel may have regarding “wilderness” areas. Therefore, just as more-wilderness advocates desire for as much area as possible to be cordoned off from vehicular access and from the use of any mechanized tools for fire suppression, resource maintenance, or historical preservation, CAL wishes just as much area as possible to remain protected from future unknown wilderness interpretations not yet contemplated or voiced.

- Current, traditional visitor usage needs “Protection”: Having said the above, CAL would NOT like to see a vastly different visitor usage than that currently enjoyed; we simply want current usage protected. That includes retention of the character of wilderness and lots of places where one already experiences a reasonable degree of solitude and quiet. All three Alternatives appear to do so through application of the proposed Management Zones (“*High Use*”, “*Experience History*”, “*Recreation*”, and “*Experience Nature*”). None of the Alternatives rely on “wilderness” but rather on the Park Service’s “**User Capacity**” and Management Zones and other authority to continue to address incompatible visitor uses throughout the Park, such as dune buggies, motorcycles on trails, and jet skis in Lake Michigan waters just off the Park’s shoreline. If we understand correctly, these and any other usages you deem incompatible with current visitor use would continue to be prohibited throughout the Park, not just in “wilderness” areas. Newsletter 4’s “*User Capacity*” section makes very clear that you have decision-making authority to protect the quality of the visitor experience in all areas of the Park. Thus, this section appears to verify CAL’s belief that a “wilderness” designation is not required for the Park Service to have the duty and authority to “*sustain... the quality of park resources and visitor opportunities...*” If such is not the case, or if we have misunderstood, or if you plan to significantly change the type of recreation within the Park, please let us know. Otherwise, we shall remain under the impression that all three Alternatives plan to retain and improve current, traditional visitor experiences, and continue to prohibit incompatible uses, and retain the Park’s wilderness character so beloved to our CAL members.

SUGGESTED MODIFICATIONS:

Overall Vision: CAL strongly urges that the “overall vision” of the Preferred Alternative and eventual GMP be the Park’s statutory purpose, as quoted in NPS May 2006 Newsletter Two.

Sleeping Bear Plateau: CAL would not object to Alternative C’s map of some of Sleeping Bear Plateau as “wilderness”. There are no roads involved, and traditional usage has long been the same as if the area was under a wilderness designation. Also, CAL shares concern with the Park Service about the dune face on the water side if damage is occurring from visitors running down it. However, a wilderness designation on the Plateau will not prevent such, but appropriate signage announcing serious fines with noticed amounts would go a long way to address this issue. CAL supports the Park Service’s continuance in all Alternatives of encouraging visitors to select the established Dune Climb on the land side to experience the joy, wonder and experience of climbing and running down these great dunes. On the changes being contemplated outside this GMP to Overlooks 9 and 10 on Pierce Stocking Scenic Drive, CAL looks forward to seeing future NPS proposals to retain the spectacular views while addressing the expensive maintenance the Park Service says is involved in the current configuration.

Alternative’s C’s “more structure, e.g. more guided programs, in concentrated use areas”: CAL respectfully asks what structure, programs, areas?

Bay-to-Bay Trail for both hikers and paddlers: Alternatives A, B, and C all propose that “*A bay-to-bay trail for hikers and Lake Michigan paddlers would parallel the mainland shoreline within the Lakeshore; on land, this trail would make use of active beach areas or existing disturbed areas and corridors.*” However, the proposed trail does not appear on any of the Maps nor a description of where exactly it would be located (on the beach? in the woods?). We hope such a trail would be inside the shoreline’s nearby adjoining woods rather than on the beach. We also would like more information about where and how sufficient parking would be provided for those transporting canoes or kayaks by trailer. Such parking would have to be fairly close to the water’s edge to avoid long portaging but if so, we would like assurance that the ambiance would not change significantly at the traditionally quiet and family oriented road-end beaches. We are under the impression that it is not your intent to replace the current traditional beach usage by overwhelming the road ends or other areas with other activities, but simply to provide more recreational opportunities for kayakers, backpackers, campers, and canoeists. If so, we applaud the idea, and we request that the next GMP publication explain how these varying uses will be accommodated and managed so that all beach goers would continue to enjoy the experience.

“4 or 5 small, primitive Campgrounds located an easy day’s hike or paddle apart along the Lake Michigan shoreline” for the Bay-to-Bay Trail: Since the Bay-to-Bay Trail is presented in all three new Alternatives, we would appreciate your thinking on why the new campgrounds feature is excluded from Alternative C. CAL also hopes the next GMP publication will give the campgrounds’ locations on the Maps or at least in the narrative. We hope the campgrounds would be designed so as not to change the ambiance and current uses of the popular areas of the beach and shoreline itself, especially near the road ends. We also hope that the next GMP publication will assure us that the Campgrounds would not be so “*primitive*” that campers would not have facilities to handle their human and garbage waste.

Dune Climb: We are unfamiliar with the term “*social trail*” in Alternative A. CAL respectfully asks the meaning and where such are now or would be located. Are they on the plateau or does “*social trail*” refer to something to be added to the face of the Dune Climb in the bare sand?

“Undeveloped” County Roads: The GMP promises to map out of wilderness boundaries only “*developed*” county roads or those roads with “*existing vehicle use*”. We understand from speaking with Park Service personnel that the only county roads falling under this description are Weir Road in Benzie County and a few roads on South Manitou Island, and that the respective County Road Commissions agree with such. We also understand that Shefler Road to the Giant Cedars on South Manitou Island is considered “*developed*”, as we would hope. We ask that the next GMP publication specify these matters, for the record.

NPS Roads: CAL would not support Alternative A’s closing of NPS-owned farm loop road off Chicago Road on South Manitou or of Tiesma Road in Benzie County.

Concession tours to the Giant Cedars: CAL greatly appreciates that Alternative B and C would “consider” allowing the concession tours on South Manitou Island to go to the Giant Cedars. For the past decade, the concessionaire has been prevented from doing so. We appreciate very much your telling us by phone that all that needs to happen for this to go forward is for the concessionaire to agree to expand the tour, and that you have a ranger assigned to handle the negotiations, and that you expect the concessionaire will want to do so. CAL will write to the concessionaire to express our membership’s long held desire for this to be available to the general public. CAL strongly urges that whatever negotiations are required are concluded soon, and that the next GMP publication states unequivocally in the Preferred Alternative that the concession tour on South Manitou Island will be expanded to allow the general public to view the Giant Cedars as long as the concessionaire wishes to do so.

Hike/Bike Trail: Alternatives A, B, and C would “consider” allowing partners to add a hike/bike trail along M-22 and M-109, but that a “study” would be needed. CAL hopes that the partners and the Park Service will work out whatever is needed to get a study accomplished.

Cross Country Skiing in Alternative B says “*Existing trails would be evaluated to see if a select few could be groomed for skiing in winter.*” CAL hopes that the eventual Preferred Alternative will commit more strongly and say that “Some existing trails will be groomed for cross country skiing in the winter.”

Campgrounds on North Manitou Island: CAL prefers Alternative C’s proposal to provide “*in addition to dispersed camping, additional designated campgrounds*” over Alternative B’s removal of “*dispersed camping*”. Unless there is a persuasive reason for removing the public’s historic access and use, CAL would favor retaining the public’s right to continue that usage. As no reason is given in Alternative B for the removal, CAL favors Alternative C in this instance.

Lake Michigan Beach Access:

- CAL highly supports Alternatives B and C’s addressing the parking problems at the Platte River.
- CAL asks that any “*improvement*” or “*expansion*” of parking at the ends of Peterson Road, County Roads 651 and 669, and Esch Road retain the natural character of the area and not duplicate the over-kill of asphalted driveway area created at Loon Lake years ago.

Lake Michigan Boat Access: While Newsletter 4 takes pains to provide opportunity for many recreational pursuits (camping, hiking, etc.), there is nothing proposed in any Alternative to meet the needs of those who wish safe access to fish the waters of Lake Michigan. Boat launching and return access to Lake Michigan beyond that afforded by the unsafe current use of the Platte River Mouth had been assumed and sought by the State of Michigan ever since the State gave land for the formation of a federal Park in 1970. The Park property enjoys a vast shoreline along miles and miles of prime Lake Michigan frontage. Surely there is somewhere along that vast coast that a small safe ramp may be located away from other visitor usages and natural resources that would be incompatible. Because the State of Michigan retains jurisdictional rights requiring the federal government to allow fishing and hunting on this federal property, we know you must and do comply, but the historical record would have one conclude that it is only because of such that the Park Service has allowed what little and unsafe boat access exists solely at the mouth of the Platte River. CAL is grateful for your frank discussion with CAL of the latest efforts by local fishermen on this issue, e.g.,:

- That non-Park Service grant money has been obtained by a local fisherman to pursue the possibility of improving the launching area right at the mouth of the Platte River.
- That other fishermen wish to see a small ramp available for launching boats into Platte Bay but not at the mouth of the Platte River where children play and swim while boaters are attempting to launch boats safely, and where constant dredging of the river is required.

You have shared with CAL that the second effort listed above would require specific recommendations followed by an in depth study of the location, any environmental impact, the engineering, etc. You also shared that the presence of pitcher's thistle and piping plover nests may be possible impediments. You have also mentioned you do not have the funding or other resources to undertake all on your own such an extensive Study in the near future, but that private funding, if provided, might serve this need. You have informed us that this is still not a high priority for you, given many other projects you are undertaking. While we applaud you for all that you have done in recent years and the attention you are now giving to all areas of the Park, we are disappointed that this GMP fails to address this need. Boating and fishing with safe access and egress on Lake Michigan are legitimate recreational activities, and if managed appropriately, do not intrude upon other visitors' enjoyment. It would be our preference to have the Park Service jump on this issue and address it, especially since a number of fishermen perished a few years ago with the lack of a safe refuge needed during a sudden storm. CAL would like to know from you and the fishermen attempting to address this need what amount of Study funding is needed, if partnerships with the Park are needed, and if there is anything CAL or others can do to help.

Ferry Service: CAL believes it an excellent idea in Alternative B to add day trips once or twice a week to North Manitou Island, and just wonders what the reason is for excluding this idea from Proposals A and C.

Benzie Corridor: Since most of the "Corridor" is privately owned rather than Park Service property, public access to its usage is a moot issue for CAL at this time. However, CAL has, as much as is within our power, encouraged those having strong opinions on the various scenarios to voice them. In addition, CAL months ago encouraged the Benzie County Board of Commissioners and impacted townships to do their own economic impact studies and give the results and their opinions on this subject to the Park Service. Some on CAL's Board of Directors strongly oppose further acquisition by the Park Service within the Benzie Corridor, believing it a waste of Park Service/taxpayer money. Some on CAL's Board are concerned about potential environmental impact on the Platte and Crystal Lake Watersheds. Some are concerned about further erosion of the County's property tax base as more private property goes off the tax rolls. Some on CAL's Board believe that if the Corridor is to be developed, a trail would be preferable to a road. All on CAL's Board want the natural character of the area preserved and the view of the ridgeline protected. Currently, much of the property appears to be former and current orchards. It also appears that unpaved county roads already snake through those hills, allowing public access by car or foot into this very beautiful area, although the current roads offer only very limited views of the lakes and woods below, and few are aware of the already available scenic hike or ride. Because so much of the impact, positive or negative, is unknown, CAL months ago strongly urged the Park Service to conduct and provide an environmental and economic impact study of each scenario prior to asking for public input so that the public could send in more informed comment. Such has yet to be done, but you have recently assured us that such would be done and published at the same time as the Preferred Alternative. CAL strongly urges the following concerns to be addressed by the contractor performing the Study:

- The potential environmental impact on the Crystal and Platte Lake Watersheds of construction of a scenic road or trail on the ridgeline where run-off from a century of agricultural usage could be expected to occur;
- The potential environmental impact on the same if the Park Service ceased acquisition efforts and the property remains in private hands;
- The potential impact on the ridgeline view if the Corridor remains in private hands or if the Park Service acquires the ridgeline properties and develops a scenic road or trail;
- The potential economic impact, positive and negative, of all scenarios, including the loss of taxpayer base on one side and the potential additional tourist dollars into the economy on the other side.

Poison Ivy: CAL does not believe it serves anyone, whether a hiker, camper, recreational user of any kind, or even Park personnel that poison ivy has been allowed to take over much of South Manitou Island. Whether most of South Manitou remains in a "wilderness" boundary or not, CAL believes the "control" and "management" of this invasive species has been neglected and should be remedied.

Economic Impacts: None of the NPS Newsletters to date include the economic impact study that is supposed to accompany wilderness proposals, and that we believe should also be done for the Benzie Corridor proposals. On the wilderness proposals, you have told us you believe the economic impact would not be significant as you believe not a vast difference exists between any of that proposed and current usage. You have also assured us that an extensive, very thick Environmental and Economic Impact Study will be provided when the Preferred Alternative is published. We would have preferred the Economics studied prior to launching various proposals, but we never-the-less look forward to seeing the Economic Impact Study promised.

Gratitude: CAL expresses our gratitude for the tremendous work and effort you have put into the ideas presented in Newsletter 4, for the obvious attention you are giving public concerns, and for this opportunity to comment.