



Citizens for Access to the Lakeshore (CAL)

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Citizens for Access to the Lakeshore (CAL) is pleased to here submit our comments on the National Park Service's Draft General Management Plan/Wilderness Study/Environmental Impact Statement of April 2008. We do so in advance of the June 13th deadline.

NPS Question Number One: *"Are you fairly satisfied overall with the Preferred Alternative, including its wilderness proposal?"*

CAL RESPONSE:

Very satisfied. The new "Preferred Alternative" for the 20-year General Management Plan is now chock full of access-friendly provisions, cultural and historical preservation, and in a manner keeping with preservation of the natural setting we all love. What a turn-around since 2002! CAL is grateful to NPS Superintendent Dusty Shultz and Assistant Superintendent Tom Ulrich for responding to CAL's concerns over these many years leading to development of their new "Preferred Alternative". CAL also is very grateful to Congressmen Pete Hoekstra and Dave Camp and Senators Carl Levin and Debbie Stabenow for their continued help to CAL during the multi-year process. Following is a list of provisions that CAL finds particularly beneficial:

1. **Purpose:** CAL had asked the NPS to stop attempting to revise the Park's purpose through bureaucratic planning documents, and return to and reiterate the 1970 Congressionally-established statutory purpose of this Park. CAL is highly pleased that the **"Purpose" of the Park in this GMP now repeats the exact language of the Congressional purpose.** (*"Purpose", page 11, GMP*)
2. **Over-all Vision:** CAL had asked the NPS not to revise through the back door the Park's purpose when constructing an "Overall Vision" for this GMP. CAL is highly pleased that the **GMP "Overall Vision" now reflects statutory purpose.** (*"Overall Vision", page 52, GMP*)
3. **County Roads:** CAL had asked the NPS to stop attempting to acquire our county road rights of way and acknowledge Benzie and Leelanau Counties' jurisdiction. CAL is highly pleased that **"Roads would remain essentially the same as now. All developed county roads would be zoned compatible with motor vehicle and bicycle use."** (*"Visitor Facilities, Opportunities, and Activities, page 53, GMP*)
4. **Reasonable Access:** CAL is highly pleased that reasonable access for everyone is now provided, and additional campgrounds and trails are also proposed.
5. **Beach Access:** CAL was concerned about county-road beach access and also asked that NPS-owned Tiesma Road be kept open. CAL is highly pleased that **"The following beach access points that are accessible to motor vehicles would remain essentially the same: Lake Michigan Road (Leelanau County), Glen Haven, North Bar Lake, Peterson Road, and Tiesma Road. Parking at the end of Esch Road would be improved. The beach access area at the end of Lake Michigan Road near the mouth of the Platte River would be zoned high use to allow for parking improvements; a separate study would examine the appropriateness of these developments in more detail."** (*"Lake Michigan Beach Access", page 54, GMP*)
6. **Wilderness Proposal:** The 1981 Wilderness Study had proposed 30,903 acres for wilderness based on the closing of critical, beach access county roads. The 2008 Preferred Alternative proposes more wilderness, 32,200 acres in all, but excludes from proposed "wilderness" the critical developed county roads, which would remain open to motorized vehicular traffic in order to provide reasonable access to established popular beaches and sites. The couple thousand additional wilderness acres newly proposed are on the plateau of Sleeping Bear Dune where no roads exist or should exist, and where a wilderness designation would be helpful, not harmful. **Therefore, CAL finds the new Wilderness Proposal a great improvement over the 1981 Wilderness Study.**

7. **Dune Climb:** CAL had asked that the Dune Climb remain. CAL is highly pleased that it will be. In addition, the NPS plans to **pave the “parking area and make other minor improvements to alleviate vehicular circulation and drainage problems and improve access for the disabled.”** (“Dune Climb”, pages 33 and 54, GMP)
8. **Preserve our History:** CAL had asked that the cultural history and viewscapes of Port Oneida, and on North and South Manitou Islands be preserved for visitor enjoyment. CAL is highly pleased that **“Experience History” Management Zones** have been created to protect these areas and allow for visitation. (“Cultural Resources”, pages 52 & 53, GMP)
9. **Boekelodge:** CAL had asked that historic Boekelodge be preserved for visitor enjoyment. CAL places our trust in the fact that, although the Boekelodge property is not designated as an “Historic Zone”, the Preferred Alternative does promise that **“All properties on or determined eligible for inclusion in the National Register of Historic Places would, at a minimum, undergo stabilization (where that action has not already occurred) or maintenance in the current condition where some preservation treatment has already been implemented..... it is the National Park Service’s intent that no action proposed be adverse. All actions affecting these historic structures and landscapes would be undertaken in consultation with the Michigan state historic preservation officer.”** (Historic Resources”, page 200, GMP)
10. **Giant Cedars:** CAL had asked that the concessionaire tour be allowed to transport visitors to the Giant Cedars. CAL is highly pleased that **“On South Manitou Island, concession-operated farm loop tours would continue. Concession auto tours to near the Giant Cedars would be allowed, provided there is demand and the service is economically feasible.”** (“Visitor Orientation, Interpretation, & Education”, page 53, GMP)

In Conclusion on NPS Question of General Satisfaction: CAL believes there is much for CAL members to support in the NPS’ Preferred Alternative.

NPS Question Number Two: *“How do you think the Preferred Alternative could be improved?”*

CAL RESPONSE:

Because the Preferred Alternative has been built over time, incorporating input and compromise along the way from many stakeholders, we would be concerned to find substantial change show up in the final December 2008 Record of Decision that is different from the April Preferred Alternative. We feel that substantial change at this point has the potential of destroying the cohesive integrity of the Preferred Alternative along with the good will that the Planning Team has worked so hard to establish the past two years.

NPS Question Number Three: *“Are there aspects of the other alternatives that you think should be added to the Preferred Alternative?”*

CAL RESPONSE:

With the information currently available to us, we have no suggestions at this time for further additions.

This concludes CAL’s comments at this time. We reserve the right to comment again if and when new information becomes available to us.

cc by FAX to: The Honorable Pete Hoekstra, U.S. Congressman
 The Honorable Dave Camp, U.S. Congressman
 The Honorable Carl Levin, U.S. Senator
 The Honorable Debbie Stabenow, U.S. Senator
 Mr. Ernie Quintana, Director, Midwest Region, National Park Service
 Ms. Sandra Washington, Chief, Planning & Compliance, Midwest Regional Office, NPS