

August 31, 2002
Ms. Dusty Shultz, Superintendent
Sleeping Bear Dunes National Lakeshore
9922 Front Street
Empire, MI 49630-9417

Re: Comments on the Draft General Management Plan / Environmental Impact Statement (GMP/EIS)

Dear Ms. Shultz:

I am a professional environmental engineer in industry and an Adjunct Professor in Civil & Environmental Engineering at the University of Michigan. As a volunteer professional, I have been involved in water quality monitoring of the Crystal Lake Watershed since 1965. As a long-time resident and riparian owner of property on Crystal Lake, I have followed the deliberations leading to the establishment of the SBDNL, and its planning and administration. Generally, I have been impressed with the management of the SBDNL and have interacted positively with staff members on environmental issues of common concern.

Most commenters may address road closures. I wish to address a specific road opening. I am very concerned about continued inclusion of the Benzie Corridor, implied as a separate "unit" under various guises and intents within SBDNL planning documents. I wish to provide personal comments relevant to this action within the GMP / EIS Alternatives (<http://planning.den.nps.gov/document/ACF1CA%2Epdf>). It is stated under the heading, Benzie Corridor, in the text of Alternative 1 (No Action), "The long-term goal of the Lakeshore is to acquire properties when they are offered by willing sellers and construct a scenic road along the ridge." This long-term goal definitely does not constitute a "no action". I direct my comments, therefore, to the issue of continued inclusion of the Benzie Corridor as described on Pages 2, 10, 13, 17, 20, 22, 25, on all maps, and in the Summary of Alternatives at Page 30, as repeated below:

Alternative	Action (Specific to the <u>Benzie Corridor</u>)
1	Acquire properties as they become available from willing sellers. Construct a scenic road along the ridge.
2	Eliminate from Lakeshore boundary.
3	Acquire properties as they become available from willing sellers. Zone as <i>Backcountry</i> and construct hiking and/or bicycling track.
4	Same as Alternative 3.

Comment on Alternative 1: Continued inclusion of the Benzie Corridor, even within this Alternative (described overall as "no action"), does not constitute "No Action". The specific language to "Acquire properties as they become available from willing sellers", and to "construct a scenic road along the ridge" should be deleted in its entirety. The Benzie Corridor is not and never has been part of the SBDNL.

Comment on Alternative 2: Action to "Eliminate (the Benzie Corridor) from Lakeshore boundary" should be supported in full for this Alternative and all other Alternatives. Unfortunately, the map accompanying Alternative 2 is inconsistent and contains the designation, "Benzie Corridor / Scenic Ridge". This designation should have been deleted prior to public comment!

Comment on Alternative 3: Action to "Acquire properties as they become available from willing sellers", and to "Zone as *Backcountry* and construct hiking and/or bicycling track" should be deleted in its entirety. The properties already are "backcountry" and lie partially within the Crystal Lake Overlay District.

Comment on Alternative 4 (Preliminary Preferred): Action described as "Same as Alternative 3", i.e. to "Acquire properties as they become available from willing sellers", and to "Zone as *Backcountry* and construct hiking and/or bicycling track", should be deleted in its entirety.

Comment on All Alternatives: All mentions of the Benzie Corridor should be eliminated from all SBDNL maps where it is now designated variously as "Corridor privately owned" or as "Benzie Corridor Scenic Ridge". This includes all maps publicly distributed and made available online at the SBDNL website.

I wish to make reference to specific language, quotations, and citations contained within the document "A Nationalized Lakeshore: The Creation and Administration of Sleeping Bear Dunes National Lakeshore", by Theodore J. Karamanski, National Park Service, Department of the Interior, 2000. I have reproduced excerpts from the section entitled, "Relegislating the Lakeshore" (available online at http://www.cr.nps.gov/history/online_books/slbe/adhi_4f.htm) as an attachment to these comments.

The "scenic route" designated as the Benzie Corridor, (shown in various SBDNL maps) generally follows the ridgeline (through the Crystal Highlands) 6.5 miles between Platte Lake and Crystal Lake (*), although specific mention of the latter is absent. Construction of this "scenic corridor" would adversely affect the viewsheds of both lakes especially by the clearing of old-growth forest and earth moving. Destruction of viewsheds is contrary to current popular local opinion strongly opposed to such action in other nearby areas. This opinion has been voiced repeatedly in recent articles and editorials in local newspapers.

It is also stated in the Management Alternatives (at Page 3) that "The NPS is concerned about fragmentation of habitat due to roads, because some species require large expanses of roadless habitat for their continued survival. Road use also introduced intrusive sounds into wild places and impairs views of the night sky." The same document also states that management direction "take no action that would diminish the wilderness suitability of an area possessing wilderness characteristics."

The Benzie Corridor remains an unwanted anachronism within the Management Alternatives. It is decidedly in contrast to the controversial "road closures" that have elicited much pointed public comment. It is incongruous to "close" old roads that the populace is desirous of having remain "open", while proposing to "open" a new road that is almost universally opposed and should forever remain "closed".

I also believe that continued consideration of the Benzie Corridor is contrary to the provisions of the Crystal Lake Overlay District which encompasses the Crystal Lake Watershed. This document contains specific restrictions and limitations regarding zoning, land development, clearing of trees and vegetation, and earth moving, that would increase soil erosion and nutrient runoff, and adversely affect the water quality of Crystal Lake (and Platte Lake). Continued inclusion of the Benzie Corridor in any management Alternative is certain to trigger requests for a full Environmental Impact Statement (EIS) under the National Environmental Policy Act. In regard to the Benzie Corridor, the GMP / EIS document has a decided lack of detail of these specific issues expected to be considered within such a document.

The Purpose for the SBDNL is to "Preserve outstanding natural features, including forests, beaches, dune formation, 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." (Page 5) The public has suggested several areas for possible inclusion within the SBDNL, but also repeatedly suggested that other areas be considered for specific exclusion. It seems incomprehensible that the Benzie Corridor remains within any of the four Alternatives of the GMP / EIS contrary to protracted public opposition over 40 years. State Senator Connie Binsfeld said, "Landowners have had to go through turmoil throughout the creation of the park while officials come and go. There is a lot of stress involved on the resident's part. Enough is enough." An aide to Congressman's Guy Vander Jagt once stated, "If the local people don't want it, forget it." I strongly encourage complete deletion of any further consideration of the Benzie Corridor from all present and future Management Alternatives and from all SBDNL maps.

Most sincerely yours,

Dr. Stacy L. Daniels
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Frankfort, MI 49635
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(*) The maps contained within the Management Alternatives document are inaccurate. They show all of Round Lake within the SBDNL. This is not true. A portion of this small Lake remains outside the SBDNL. The southernmost boundary of the SBDNL is also incorrect. It does not extend to the shores of Crystal Lake. Adjustments should be extended to all maps publicly available in print and online.

Attachment to Comments of Dr. Stacy L. Daniels, August 31, 2002.

http://www.cr.nps.gov/history/online_books/slbe/index.htm

"A Nationalized Lakeshore: The Creation and Administration of Sleeping Bear Dunes National Lakeshore", by Theodore J. Karamanski, National Park Service, Department of the Interior, 2000.

http://www.cr.nps.gov/history/online_books/slbe/adhi_4c.htm

The General Management Plan Process

http://www.cr.nps.gov/history/online_books/slbe/adhi_4f.htm

Relegislating the Lakeshore (Underlined emphases added by this commentor)

The 1982 bill amending the lakeshore was twice as long, even so it left hanging several controversial issues. Left unaffected by Public Law 97-361 was the proposed six and a half-mile scenic road corridor through the Crystal Highlands in Benzie County. People in the county were divided over the desirability of the corridor. Property owners on Platte Lake generally opposed the project as something that might degrade the quality of water within that lake's drainage. In 1977, the County Board of Commissioners had enthusiastically approved the proposed scenic road. Some business interests still favored the road as a way to guarantee that Benzie County was seen as the gateway to the Sleeping Bear Dunes. Unlike the politically savvy Citizens' Council in Leelanau County, the Platte Lake Improvement Association did not act decisively to have the scenic corridor removed from the lakeshore when the issue was before Congress. "Whatever they did, we've got to do," lamely observed a member of their board of directors after the fact. The formal removal of the Leelanau portion of the scenic drive from the lakeshore acted as a prod for Benzie County to bring the issue to a head. An ad hoc committee of the county commission was formed to review the road. That feasibility study established that there would be no serious environmental side effects from the road, that it would, however, be very costly (\$18.7 million), and that based on current park visitation rates the road was not necessary. The park service's main reason for wanting the road—to maintain the area's rural character—was turned on its head, with the corridor cited as the main threat to the areas rural landscape. Finally in August of 1983 the county commissioners met and voted to reverse their earlier support for the park road. Later that year Congressman Vander Jagt introduced H.R. 4242 to delete the Benzie Corridor from the lakeshore. "I'd say it's dead as a doornail," one of the Congressman's aides told the press. "If the local people don't want it, forget it." Nonetheless no bill to officially remove the corridor from the lakeshore was ever approved and two decades later it remains part of the Sleeping Bear park plan.[54] *Benzie County Weekly Express/Press Box*, October 7, 1982; *Record-Eagle* (Traverse City), August 22, 1983.

The amendment of the lakeshore's organic act dictated the dimensions of Sleeping Bear's land protection plan. The plan was the brainchild of Secretary Watt and was part of a nation-wide effort to make the National Park Service's land acquisition program more efficient and transparent. Land protection plans, it was hoped, would also cut the cost of park expansion by asking units to identify alternatives to fee acquisition and by encouraging parks to acquire only the absolute minimum interest in the land needed to meet management needs. The Sleeping Bear plan focused on the remaining 5,012 acres of non-federal land within the revised boundaries of the lakeshore. It proposed how best to use easements and other protection regimes on these lands as well as reviewing the status of the 1,399 acres of private land already under restrictive agreements. The plan also proposed scenic overlooks, parking areas and access roads for the Miller Hill and Bow Lakes preservation areas. The plan largely confirmed what had been enacted in 1982 and this angered many people who expected that the plan would reflect the new local consensus against the Benzie corridor. Public meetings presenting the plan were predictably stormy as old grievances were voiced and threats muttered. Even the proposal to use easements to protect the Bow Lakes drew flak from a property owner who argued he would rather the lakeshore bought the whole tract rather than place restrictions on the use of a portion of it. The sentiment, which drew the largest applause at the public meetings, however, came from State Senator Connie Binsfeld. "Landowners have had to go through turmoil throughout the creation of the park while officials come and go," she observed. "There is a lot of stress involved on the resident's part. Enough is enough—I hope there would be no more changes in the plan."^[55] *Leelanau Enterprise and Tribune*, August 4, 1983; *Record-Eagle* (Traverse City), August 4, 1983.

Map at <http://www.nps.gov/carto/PDF/SLBE-we1.pdf>

Map of SBDNL showing southern boundary at Round Lake and Crystal Lake with Benzie Corridor.

<http://planning.den.nps.gov/parkweb/default.cfm?RecordID=75>

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<http://planning.den.nps.gov/document/ACF1CA%2Epdf>

The full 36-page document describing the four Management Alternatives.

“Benzie Corridor” is mentioned on pages 2, 10, 12, 17, 20, 22, 25, & summarized in a table on page 30.

In regard to the “Benzie Corridor”

Alternative 1	Acquire
Alternative 2	Eliminate
Alternative 3	Acquire, zone as back country and construct biking and/or bicycling trails.
Alternative 4	Same as Alternative 3

http://www.cr.nps.gov/history/online_books/slbe/index.htm

**A Nationalized Lakeshore:
The Creation and Administration of Sleeping Bear Dunes National Lakeshore
By Theodore J. Karamanski
National Park Service
Department of the Interior
2000**

http://www.cr.nps.gov/history/online_books/slbe/adhi_4c.htm

The General Management Plan Process

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