

“FREQUENTLY ASKED QUESTIONS”

GENERAL MANAGEMENT PLAN /WILDERNESS STUDY / ENVIRONMENTAL IMPACT STATEMENT (GMP/WS/EIS) SLEEPING BEAR DUNES NATIONAL LAKESHORE

Questions and answers will be added to this document from time to time, as we receive more comments and questions from you. The date that questions and answers are added will be clearly indicated. You may note that we have provided more detail on some topics, such as wilderness, when compared to earlier versions. This is an expected outcome of planning, as more information becomes available or more analysis is conducted.

June 13, 2008

Why doesn't the draft GMP include cultural resources in the Lakeshore's purpose statement?

The purpose of the Lakeshore was specified by Congress in the 1970 enabling legislation that established the Lakeshore. That purpose does not include cultural resources. Changing the purpose statement to include something not specified by Congress would exceed the authority of Lakeshore managers, as it would be inconsistent with the enabling legislation. (See August 22, 2007 FAQ below for further discussion of cultural resources and enabling legislation)

Does not including cultural resources in the purpose statement or enabling legislation jeopardize the Lakeshore's ability to compete for funding to preserve them?

No. The Lakeshore has been competing very successfully for cultural resource preservation funding for the last ten years, even though they are not included in the legislation, nor in any purpose statement in the existing GMP. There is no reason to expect this to change. The criteria for the available fund sources are predicated on factors such as the level of significance of the resource (national, state, local), its condition, and its utility for visitor or administrative purposes.

Could the National Park Service designate a section of beach as “clothing optional”?

No. Michigan Penal Code 750.335a prohibits indecent exposure, which includes public nudity. We have no plans to designate any beaches as clothing optional, as it would violate this state law.

May 16, 2008

Why have the areas adjacent to highways M-22 and M-109 been placed in the high use zone in all alternatives?

Highways M-22 and M-109 were placed in the high use zone because of the high volume of traffic they carry. The width of the high use zone (each side) from the centerline of these highways is approximately 300 feet to allow for the possible development of a multiple-use, non-motorized trail (Trailway) along these corridors. Over most National Park Service lands along these highways, the Trailway would be placed within the narrower confines of the existing highway rights-of-way. Within this high use zone, wherever the NPS land is not needed for the Trailway, the width of the high use zone would revert back to just the M-22 or M-109 right-of-way, and the lands would revert to the adjacent management zoning.

A Trailway plan for Leelanau County is currently underway and should be available for public review in late summer 2008. This plan identifies alternatives for providing safe, non-motorized use on a trail separated from the road surface. Planning for the Trailway in Benzie County has not been initiated. The draft GMP includes management zoning that would accommodate Trailway options in both counties.

Does this mean that private lands would be acquired in order to develop the Trailway?

No. The high use zoning in the GMP in no way implies the acquisition of private lands for Trailway development. The Trailway, as currently proposed, is located entirely on federal land within the National Lakeshore, state highway rights-of-way, or, in a few isolated cases, on county road rights-of way. Anywhere such a Trailway might have to cross private lands, it would have to remain within the existing highway rights-of-way.

The National Park Service does not control state or county road rights-of-way within the National Lakeshore. The National Park Service also recognizes private inholdings and other valid existing rights, and the management zones shown in the alternatives are not intended to imply otherwise.

August 22, 2007

Cultural Resources:

Why doesn't the Lakeshore change its enabling legislation to include and protect cultural resources?

Cultural resources at the National Lakeshore already are protected by several other legislative acts, regulations and management policies and are recognized for their significance in park planning documents. The National Park Service Organic Act that governs all units of the national park system states that the mission of the agency is to "...conserve the scenery and the natural and historic objects therein..." In addition, NPS Management Policies, the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, the Archeological Resources Protection Act, and the National Historic Preservation Act guide management actions to protect and preserve these resources. The enabling legislation for the National Lakeshore itself, while not

listing cultural resources as part of the purpose for the park, does instruct that a management plan be developed for their protection.

The GMP/WS will make clear that it is the National Lakeshore's intent to preserve all of its cultural resources. In fact, the significance statements and list of fundamental resources that help to guide the plan specifically cite the National Lakeshore's cultural resources. The National Lakeshore has been competing quite successfully for the limited funding available to preserve cultural resources and there is no reason to expect that to change in the future, regardless of whether they are mentioned in our legislation or not. While amending the National Lakeshore's legislation to include cultural resources would provide yet another layer of protection for them, their protection is already specifically addressed by these numerous laws, regulations, policies, and by the GMP/WS itself. Typically, legislation is amended to solve a problem not foreseen at the time of passage or to resolve an issue that cannot otherwise be resolved through existing law, regulation, policy or practice. It is because of the existing multiple layers of legal protection and the preservation commitment made in the GMP/WS that park managers do not believe the issues surrounding the management of cultural resources require a legislative fix.

If cultural resources are listed in Wilderness zones, does that mean they will be lost?

No. The Wilderness Act does not require removal of cultural resources nor mandate that they be abandoned. It does however, set guidelines for the use of minimum tools and other requirements pertaining to the maintenance of these resources in a manner that also ensures the area maintains its wilderness character. The National Lakeshore has been operating under these guidelines for more than 20 years, and has stabilized and restored several historic structures within proposed wilderness using the minimum requirement concept.

The Recreation and Experience Nature zones say that “return to nature” is a possible treatment of the cultural resources in these zones. Doesn't that mean that the park might decide to allow them to molder rather than to preserve them?

No. The “return to nature” possibility was shown in Newsletter #4 only to highlight the fact that the National Lakeshore contains so many historic structures and landscapes, that our anticipated funding levels are unlikely to allow us to preserve all of them in good condition. Immediately preceding the range of possible treatments is a positive statement of the intent to preserve all of these resources. We would ideally like to preserve everything, but the reality is that we may not be able to. The management zones and criteria provided in the GMP are intended to help us make the difficult choices of where to expend our funds if they prove insufficient to allow us to bring everything up to good condition. The GMP/WS will establish a framework (e.g. identifying fundamental resources, and objectives within the management zones) in which to prioritize similar hard decisions for the National Lakeshore's, natural or recreational resources as well as for our facilities. Just as we all must be prudent with our own household budgets, and make spending decisions based on what is most important and cost-effective for ourselves, the National Lakeshore must be prudent with the expenditure of taxpayer funds based on the same principles.

We have received comments that have correctly pointed out the error in our wording that implies that “return to nature” might actually be selected as a treatment based on the priority factors listed. The Draft GMP/WS/EIS will correct this, and will reflect the fact

that the decision to be made is NOT whether to intentionally let some resources go – but rather, how to begin prioritizing allocation of our limited funding, partnership, and volunteer efforts.

Does listing on the National Register of Historic Places protect historic buildings from any potential of loss?

Not completely. Structures listed on, or eligible for, the National Register of Historic Places have been deemed historic and this designation requires federal land managers to carefully evaluate the effects of any proposed actions or undertakings. The land managers must then consult with the State Historic Preservation Officer for their concurrence with an assessment of the effects of the proposed action. If a proposal is found to have an adverse effect on historic resources, the land manager must either: cancel the action, mitigate the adverse effects, or, if the action is necessary for reasons that outweigh the adverse effects, as a last resort, document the status of the historic resource prior to the adverse effects taking place. This, however, only addresses the care with which actions must be proposed. Eligibility or listing on the National Register of Historic Places is by no means a guarantee that adequate funding will be provided to preserve the historic structure. All over the country there are examples of nationally significant historic resources that are suffering from a lack of adequate preservation funding.

What are fundamental resources?

Fundamental resources are those resources whose health, integrity, or quality are vital to achieving the park's mission and maintaining its significance. Fundamental resources are those that must be preserved and protected to ensure the integrity of the park. For example: the sand dunes are a fundamental resource at the National Lakeshore, and without them, the National Lakeshore might cease to exist; and the U.S. Life Saving Stations are a fundamental resource at the National Lakeshore, and without them, the National Lakeshore would lose its historic significance.

Why doesn't the NPS go on record, committing to the protection of all cultural resources at the Lakeshore?

We have. The National Park Service is in the preservation business and is committed to protecting and preserving all of its natural and cultural resources, both fundamental and non-fundamental. However, increasing demands and dwindling funds have forced public land managers everywhere to continually evaluate resources using prioritization criteria to determine which resources are funded first. The NPS is counting on philanthropy and volunteers to help us preserve the National Lakeshore's cultural resources, as the need currently exceeds our financial capability.

June 11, 2007

Why don't you leave the park the way it is now?

Many people have said they would like the Lakeshore to stay essentially the way it is now, and that is certainly possible. The General Management Plan revision was begun, however, to address some new planning needs. New acreage has been added to the

Lakeshore at Bow Lakes, Miller Hill, and the Crystal River, and planning for those areas is needed. New resource information unavailable when the park was established or when the first General Management Plan was completed is now available, and resource conditions and use have changed since that time as well.

Although you wouldn't think so, Alternative A, rather than the No-Action Alternative, would actually come the closest of the four alternatives to keeping the Lakeshore the way you see it today. Here's why:

Since 1981, the NPS has managed nearly 31,000 acres in the Lakeshore as wilderness, and this would continue under the No-Action Alternative. The 1981 Wilderness Recommendation, however, includes a number of county road rights-of-way. This means that if the Leelanau or Benzie County Road Commissions ever abandoned those rights-of-way, the National Park Service would close them to vehicles, in order to remove a use that is incompatible with the wilderness values of naturalness, solitude, and primitive, non-mechanized recreation.

Alternative A would propose wilderness areas similar to what we have had since 1981, *except the road rights-of-way have been specifically excluded from the wilderness areas to ensure that the roads will stay open to vehicles.* In Alternative A, everywhere you can drive today, you would be able to drive twenty years from now.

Alternative A would keep most of the park the way it is now, instead of zoning for major developments such as new roads, large paved parking lots, etc. However, it does call for some changes, such as modest enhancements to recreation facilities (bicycle and hiking trails, minor parking lot improvements, etc.), and the removal of Tiesma Road and the last part of the Farm Loop on South Manitou Island.

What is the Benzie Corridor?

As a scenic southern entrance to Sleeping Bear Dunes National Lakeshore, the Benzie Corridor (Crystal Ridge) would connect U.S. Highway 31 and Michigan Highway 22, via a scenic roadway and hike/bike trail on the ridge between Crystal and Platte Lakes. This scenic roadway was authorized by Congress on October 21, 1970 in Section 12 of Public Law 91-479, the enabling legislation for Sleeping Bear Dunes National Lakeshore. Since then, the National Park Service has been purchasing land from willing sellers within the Lakeshore boundary as funding becomes available. The National Park Service currently owns about 10% of the land within the Corridor boundary.

What was the rationale for the Benzie Corridor?

Construction of the scenic road between US 31 and M-22 was proposed to provide an identifiable southern entrance to the National Lakeshore. A scenic road is typically established as more than just a way to get from one place to another – it traverses areas with high aesthetic or cultural values. Accommodations for picnicking, parking, hiking, and other recreation potential could be built into the scenic road corridor. Where a scenic road leads into a larger park, such as Sleeping Bear Dunes NL, it provides an introduction to the area and also provides a welcome to a special place set aside for their use.

What options are on the table for the Benzie Corridor?

The scenic roadway is being evaluated during the new GMP/WS process. Public suggestions range from continuing to acquire land and eventually constructing the scenic roadway, to making the area a hike/bike trail only, or even eliminating the Benzie Corridor from the Lakeshore boundary.

Following its initial authorization in 1970, the scenic road was reevaluated in a 1977 study, and again during the creation of the Lakeshore's 1979 General Management Plan, both times with little opposition and strong support from Benzie County officials for the scenic road. Conversely however, much opposition was expressed for a similar corridor that had been authorized around Big Glen Lake in Leelanau County, so legislation was introduced in the 97th Congress that deleted this northern scenic road corridor from the Lakeshore boundary.

What would the proposed scenic road be like?

The proposed scenic road would begin with an interchange structure on US-31 and continue in a generally northwestward direction along the Crystal Ridge to an intersection with M-22. The road would provide scenic variety, passing through forests fields, and offering outstanding scenic views. To the north and east, Platte Lake, Empire Bluffs, and Lake Michigan are the primary scenic features, while to the south and west Crystal Lake is the focal point. Complementary facilities along the scenic road would likely include scenic overlooks, picnic areas, comfort stations, and hiking and biking trails.

The road would be somewhat similar to the Pierce Stocking Scenic Drive, except that it would be two-way. It would have an entrance station and would be closed to commercial traffic.

What are the environmental impacts?

A comprehensive analysis of environmental, cultural, and socioeconomic impacts would be undertaken in compliance with the National Environmental Policy Act if and when sufficient land has been acquired, the project becomes one of the Lakeshore's high priorities and project planning funds become available. In the interim, the Environmental Impact Statement for the GMP itself will address these concerns, although not in as much detail.

It is likely that there would be some short-term and/or localized impacts to soils, wildlife, vegetation, etc. with construction of either a roadway and trails, or just trails. In the long-term, however, protection of the scenic corridor through acquisition by the National Park Service would ensure a lesser degree of impacts than would arise from the likely residential development that would eventually take place. According to a 1982 feasibility study, the use of erosion control techniques, coupled with soil characteristics in the project area (sandy soils which can absorb 6-20 inches of water per hour; Soil Conservation Service, Benzie County) would ensure that runoff from the scenic road would not drain to Platte or Crystal Lakes, which are more than 2,000 feet from the proposed road at the closest approach. Phosphorus is contained in road runoff, but it also is rapidly immobilized as the runoff percolates through soil (Porcella and Bishop, 1975). Thus these pollutants would not reach Platte or Crystal Lakes, either from direct introduction of runoff or from infiltration to the groundwater.

What are the economic impacts?

A comprehensive analysis of environmental, cultural, and socioeconomic impacts would be undertaken in compliance with the National Environmental Policy Act if and when sufficient land has been acquired, the project becomes one of the Lakeshore's high priorities and project planning funds become available. In the interim, the Environmental Impact Statement for the GMP itself will address these concerns, although not in as much detail.

Construction of the proposed scenic road between US-31 and M-22 would provide an identifiable southern entrance to the National Lakeshore. It is expected that most visitors now using the four county road short-cuts would use the new road. The new road would likely change the amount of visitor traffic on local roads. Although this could reduce traffic to some businesses and resorts on these roads, this would be offset by the likelihood that visitor use patterns in the Lakeshore would be shifted somewhat from the attractions in the north to these improved facilities in Benzie County. Area tourist industries in general would be expected to benefit from this shift. Construction of the scenic road could also delay the need to upgrade the county road network in the project area. The local economy would benefit from the road construction directly, through wages to local workers, and/or indirectly, through materials and services purchased. The scenic road and/or biking and hiking trails might add slightly to the overall popularity of the Lakeshore as a tourist destination stop which would result in an increase in local tourism business.

What happens if the Benzie Corridor Scenic Roadway is eliminated?

The Benzie Corridor was included in the legislation that created the National Lakeshore in 1970, and if its removal were to be included in the final General Management Plan, the National Park Service would need to prepare a legislative proposal, through the U.S. Department of the Interior, to suggest that U.S. Congress pass an amendment to the Lakeshore's enabling legislation to remove the scenic corridor from the boundary.

Following passage of such an amendment, any land owned by the NPS in the corridor could potentially be exchanged or sold as payment for land to be purchased from willing sellers within the rest of the Lakeshore boundary. Otherwise, as excess Federal property, the land could also be made available first to other Federal agencies, then offered to states, public agencies or nonprofit organizations and lastly offered to the public for sale. Elimination from the Lakeshore boundary would mean the continued development of the area for private residences, and all of the associated support infrastructure (private roads and driveways, septic systems

February 26, 2007

Why don't you have members of the public on the GMP/WS planning team?

Many members of the public are actively involved in the GMP/WS planning effort; however, a member of the public may only participate on the planning team itself under the guidance of The Federal Advisory Committee Act. The Act states that, "Advisory committees should be established only when they are determined to be essential, and their numbers should be kept to the minimum necessary." In fact, action by both Congress and the President is needed to establish an Advisory Committee, and such action is relatively

rare. The National Park Service (NPS) has received thousands of public comments and ideas during the GMP process and the planning team takes all of this into consideration during the development of the new plan.

Is the NPS attempting to ban access to beaches?

Of course not. The NPS is currently preserving and improving access to beaches within the National Lakeshore. The NPS is seeking to provide a variety of recreational opportunities from solitary walks to drive-to beaches. The *1981 Wilderness Recommendation* included a number of county roads that provide vehicle access to beaches. The action alternatives in the new GMP/WS effort will state that all county roads which you drive on today will remain open to vehicles and not be included in any new wilderness proposal. Regardless, Leelanau and Benzie Counties own the rights-of-way on many beach access roads within the National Lakeshore and unless these rights-of-way are abandoned by the Counties, these roads will remain open, even under the *1981 Wilderness Recommendation*.

Why don't you hold your public planning meetings in the summer when seasonal residents can attend?

This three year project, scheduled for completion by December 31, 2008, is extraordinarily ambitious; general management plans typically take a minimum of four years from start to finish, even when they are not complicated by the inclusion of a wilderness study. The three year timetable established for this specific project is driven substantially by National Environmental Policy Act requirements for environmental impact statements, such as mandatory public review and waiting periods aligned with notices in the Federal Register. If public meetings were held during the summer, there is simply no conceivable way that the project could be completed by the specified project deadline. However, public meetings are only one of the many ways to provide comments. Other ways include completing and mailing comment forms, commenting on-line using the planning website, completing a comment form on the National Lakeshore website and using the new Web Forum. Good ideas are always welcome no matter when received; however, comments received by the indicated deadline will be most helpful. Immediately following the May 2007 public comment period, the planning team will begin to analyze the environmental impacts, select the preferred alternative and prepare the draft GMPS/WS/EIS.

If it ain't broke -- don't fix it! Why are you trying to change things by creating a new plan?

Typically, General Management Plans for units of the national park system are developed every 15-20 years. A lot has changed at Sleeping Bear Dunes National Lakeshore since the last plan was adopted almost 30 years ago. For instance, three new areas were added to the park's boundary (Miller Hill, Bow Lakes and Crystal River); updated direction is needed for the management, preservation and interpretation of cultural (historic) resources; and fundamental resources must be identified. Many feel that the *1981 Wilderness Recommendation* no longer makes sense and the new plan is considering changes to it. Also, lands have transferred from private to federal ownership over the years, increasing opportunities for visitor use and public enjoyment. As non-historic structures are removed and the landscape is returned to a more natural state, the public is gaining more access and new opportunities to enjoy the National Lakeshore. By working

with the public to develop a new GMP/WS, we can ensure that the natural and cultural resources of Sleeping Bear Dunes National Lakeshore are protected and enjoyed to the fullest.

Whose idea was it to restore the National Lakeshore to a Pre-Columbian state anyway?

The idea of a “Pre-Columbian” goal for natural areas was formerly used in NPS planning across the country. Although it originated with the best of intentions years ago, biologists now recognize that the idea of returning natural areas to their condition before Columbus discovered America may not be achievable. A more appropriate goal is simply to try to permit natural processes to work to the extent practicable, given past and present land use and biological and societal constraints.

What happens to cultural resources located in areas designated as wilderness?

Cultural (historic) resources may be maintained in wilderness - just as they have been over the last several years at the National Lakeshore. The Wilderness Act provides for exemptions that allow the NPS to maintain cultural resources within wilderness using minimal tools and techniques so as to leave the wilderness values of the area unimpaired. Sometimes cultural resources in wilderness, or even in other locations, may be left to nature forces. The GMP/WS will provide management direction for cultural resources, both in and out of wilderness.

Can you recreate in wilderness?

Absolutely. Wilderness is intended specifically for recreational use by people who want to enjoy a primitive, “get-away-from-it-all” experience. The Wilderness Act of 1964 states that wilderness “shall be administered for the use and enjoyment of the American people” and “shall be devoted to the public for purposes of recreation, scenic, scientific, educational, conservation and historic use” (Sections 2a and 4b). Nationwide, more than 12 million people visit wilderness each year. Wilderness visitors enjoy “leave-no-trace” camping, backpacking, hiking, hunting, horseback riding on designated trails, fishing, climbing, canoeing, skiing, bird and wildlife watching, star gazing, photography and many other activities. Most types of recreation are allowed in wilderness, except those needing mechanical transport or motorized equipment, such as motorboats, cars, trucks, off-road vehicles, bicycles and snowmobiles (exceptions include wheelchairs and emergency rescues).

Can you hunt in wilderness?

Yes. Hunting is enjoyed in many wilderness areas across the country, including within the currently proposed wilderness at the National Lakeshore.

What developments are planned for the National Lakeshore?

The NPS is making improvements to the Glen Haven Historic Village and to other historic structures throughout the National Lakeshore as funding is available. We are also in the planning phase of a project to address resource, safety, and maintenance issues at the #9 and 10 overlooks on the Pierce Stocking Scenic Drive. There are bank restoration projects planned along the Platte River at the old Waterwheel and Casey’s

sites, and in consultation with the Counties we are developing plans to improve road endings near some Lake Michigan beaches.

Why can't we add North and South Fox Islands and the Crib to the National Lakeshore?

These areas are all outside the National Lakeshore's boundary. In order for the NPS to add areas to its boundary, there must be federal legislation allowing the adjustment.

Areas being considered for boundary adjustments must meet the following criteria:

1. Protect significant resources and values, or enhance opportunities for public enjoyment related to park purposes;
2. Address operational and management issues, such as the need for access or the need for boundaries to correspond to logical boundary delineation such as topographic or other natural features or roads; OR
3. Otherwise protect park resources that are critical to fulfilling park purposes.

Additionally, recommendations for boundary changes must meet the following two criteria:

- The added lands will be feasible to administer, considering their size, configuration, and ownership, and hazardous substances, costs, the views of and impacts on local communities and surrounding jurisdictions, and other factors such as the presence of exotic species; AND
- Other alternatives for management and resource protection are not adequate.

North and South Fox Islands and the Crib do not appear to meet the requirements of the above criteria.

June 1, 2006

How did the National Lakeshore become involved with wilderness?

The 1970 legislation that authorized creation of the National Lakeshore (P.L. 91-479) stated that "Within four years . . . the Secretary of the Interior shall . . . report to the President . . . his recommendation as to the suitability or nonsuitability of any area within the lakeshore for preservation as wilderness . . ." In response to this legislation, a *1975 Wilderness Recommendation* was prepared by the NPS, which included 35,060 acres in six areas as "potential" wilderness. It did not recommend any lands for full wilderness status at that time because of nonconforming uses and the lack of federal ownership. No detailed maps of the acreage were produced. The *1975 Wilderness Recommendation* was forwarded through the Department of the Interior but was never officially transmitted from the President to Congress.

The *1975 Wilderness Recommendation* was reviewed in the late 1970s as part of the *1979 General Management Plan*. The *1979 General Management Plan* recommended excluding the Sleeping Bear plateau unit because of vehicle use on the Hart Nature Trail (Stocking Scenic Drive). It also excluded a "public transportation" corridor on South Manitou Island and several areas of private land on the mainland and road access to them. Based on the *1979 General Management Plan*, a *1981 Wilderness Recommendation* proposed 7,128 acres of recommended wilderness and 23,775 acres of "potential" wilderness in five areas. Best available information suggests that the *1981 Wilderness Recommendation* was approved by the NPS Director, but never transmitted from the Assistant Secretary to the Secretary of the Interior.

In 1982 Congress passed an amendment to the park enabling legislation (P.L. 97-361), stating that the President was to, no later than June 1, 1983, recommend wilderness suitability to the Congress. In May of 1983, the Director transmitted the *1981 Wilderness Recommendation* again, through the Assistant Secretary to the Department Legislative Counsel. It appears that it was never formally transmitted to the President. In the 1982 amendment, Congress also required that areas described in the *1981 Wilderness Recommendation* be administered to maintain their presently existing wilderness character “until Congress determines otherwise.” *NPS Management Policies* in place then and since that time also require such management, which has now been occurring for 25 years.

As part of this *General Management Plan/Wilderness Study* process, the National Park Service will develop a range of wilderness boundary alternatives. The lands proposed for wilderness in the *1981 Wilderness Recommendation* and addressed by Congress in the 1982 amendment will be included in the *General Management Plan/Wilderness Study* in the “No Action” alternative (current management) as a baseline for comparison. Other alternatives will present options for varying amounts of wilderness. Ultimately, whatever area is proposed for wilderness in the selected alternative will be transmitted to the Secretary of the Interior for recommendation to the President, through the process described below.

It is important to note, however, that the 1982 amendment requires that areas proposed in the *1981 Wilderness Recommendation* “until Congress determines otherwise.” So, regardless of the alternative selected in the *General Management Plan*, all lands included in the proposed wilderness area referenced by the 1982 amendment (P.L. 97-361) will continue to be managed to maintain their wilderness character “until Congress determines otherwise.”

What is the process for conducting a wilderness study?

A wilderness study is a formal, thorough analysis of lands eligible for wilderness consideration. The study evaluates which lands should be managed for wilderness values, describing various alternatives for wilderness and examining what the impacts of each would be. A wilderness study may identify lands that do not qualify for immediate designation as wilderness due to temporary, non-conforming, or incompatible conditions, but that would eventually become wilderness when these conditions are removed. These lands are described as “potential” wilderness.

A wilderness study results in a proposal by the National Park Service that the Secretary of the Interior transmit a wilderness recommendation to the President. This proposal may be for some, all, or none of the eligible areas to be recommended as wilderness or potential wilderness. During the *Wilderness Study*, the National Park Service invites full public participation, studies different wilderness alternatives, publishes notices in the *Federal Register*, conducts a public hearing, and prepares an *Environmental Impact Statement (EIS)*, as required by National Environmental Policy Act (NEPA) regulations. The *Draft Environmental Impact Statement* must contain a range of wilderness alternatives, including a preferred alternative. Once comments on the *Draft Environmental Impact Statement* are considered, the *Final Wilderness Study/Environmental Impact Statement* is produced and a Record of Decision issued. Then the *Final Wilderness Study/Environmental Impact Statement* and Record of

Decision are transmitted to the Secretary of the Interior, who then recommends it to the President, for submittal to Congress.

Why does the planning process take so long?

General management plans typically take three to five years to prepare, depending on the complexity of the park. The process includes numerous public involvement steps; data gathering; environmental impact analysis; writing, editing and formatting; NPS document reviews; and printing. This current *GMP* process also includes a *Wilderness Study*, which makes the three-year schedule more ambitious for this complex park.

Are you going to be closing any roads?

Benzie and Leelanau counties control almost all of the road rights-of way in the park and closure of those roads is beyond NPS authority. No county roads could be closed unless Benzie and Leelanau Counties decided to abandon them. We intend to closely involve the road commissions from both counties in the planning process. The majority of road-related comments received in response to Newsletter #1 supported maintaining existing road access, though there were several that suggested closing roads as well. The *General Management Plan* will address these comments by examining how roads support or impact park resources and visitor experiences, and determining which roads are needed to serve NPS visitor or administrative purposes. This information will: 1) provide management direction for NPS-owned roads, and 2) provide information for the counties to consider in their road management and maintenance programs.

How did you develop the purpose and significance statements?

The purpose statement conveys the reasons for which the National Lakeshore was set aside as part of the national park system. It is grounded in a thorough analysis of National Lakeshore legislation and legislative history. Significance statements capture the essence of the National Lakeshore's importance to the nation's natural and cultural heritage. They describe the National Lakeshore's distinctiveness and describe why an area is important within regional, national, and global contexts. Significance statements help managers focus their efforts and limited funding on protection and enjoyment of attributes that are directly related to the purpose of the National Lakeshore, the mission of the National Park Service, and the will of Congress. The planning team considered comments received during scoping and again reviewed the 1970 park enabling legislation (P.L. 91-479) and legislative history to develop the purpose and significance statements included in this newsletter. The planning team believes that the revised purpose statement reflects Congress' intent when it established the National Lakeshore.

Are there other laws and regulations that direct park management, other than the law that created the National Lakeshore?

All park units are required by the National Park Service Organic Act of 1916, which created the National Park Service, to manage park resources so as to leave them "unimpaired for the enjoyment of future generations." Park units are also required to meet the provisions of many other federal laws such as the National Historic Preservation Act, the Endangered Species Act, and the National Environmental Policy Act. In addition, there are a number of "special mandates," which are laws or regulations that are more specific to the National Lakeshore. These are addressed more fully in a separate document available on the park's website.

How can I view public comments on the newsletters?

Public comments on the newsletters are considered pre-decisional information. We take every precaution to protect the privacy of those who comment. Comments will always be *summarized* and made available to the public in future documents (newsletters and the draft plan). The “Summary of Comments on Newsletter 1 – May 2006” is available by linking on the park webpage. Individual public comments are collected but are not available for public viewing until *after* a final decision is reached by the NPS Regional Director with the signing of a Record of Decision.

Does completing the GMP guarantee future funding and implementation?

No. As a long-term vision for management of the National Lakeshore, the GMP will provide “big picture” guidance. Once the GMP is completed, future action plans, which “tier” off the GMP, will be prepared and will help support park requests for funding for a variety of activities. Although a GMP provides the analysis and justification for future funding, the plan in no way guarantees that money will be forthcoming.

FEBRUARY 1, 2006

Is this a brand new General Management Plan (GMP) process or a restart of the process stopped in 2002?

The new GMP/Wilderness Study/Environmental Impact Statement (GMP/WS/EIS) process will be “brand new.” It will take into consideration resource information and public comments gathered from the past GMP effort, but it will be a new start.

Why do a new GMP now?

Park planning is an ongoing process, and general management planning is the broadest level of decision making for national parks. GMPs are required for all parks and are intended to guide management direction for 20+ years. The current GMP was completed in 1979 and is no longer adequate.

Will the comments submitted during the initial GMP planning phases (1999-2002) be considered in the new start?

Yes. We will certainly review the public comments from the last GMP effort. Good planning always includes a review of past and concurrent planning efforts.

What are the planning steps?

The general planning steps include: scoping (gathering ideas for the “scope” of the project), developing preliminary alternatives, refining preliminary alternatives, preparing a draft plan and revising and preparing a final plan. A more detailed listing of the steps is identified in each Newsletter and is also available on the park’s website at www.nps.gov/slbe. Public comments will be solicited throughout the planning process, which will take about three years to complete.

How will this GMP process be different from the previous planning effort?

The biggest difference is that this process will include a Wilderness Study component. This means that changes to the existing wilderness proposal will be considered among the alternatives. Also, we will increase opportunities for public input. The public will be involved at several points. We anticipate frequent feedback loops so that people can see their input reflected in the issues identified, alternatives crafted, and decisions made. Visit the park's website at www.nps.gov/slbe for the latest information on the project.

How will people be able to give their input, and how will it be used?

Public input will be sought through a variety of methods such as letters, press releases, newsletters, websites, workshops and public meetings. Information gathered through these methods will be incorporated into planning at each step. Public comments will be carefully reviewed, grouped as appropriate, and considered by the planning team. The GMP will identify alternatives that were considered but not carried forward for detailed analysis. Suggestions that are outside the scope of the GMP have been identified in the Summary of Comments.

The park's website (www.nps.gov/slbe) will contain links to review documents and additional information about the project.

Public open houses were held on February 14-15 and March 2, 2006. Future public open houses and meetings will be scheduled during the warmer months.

Who is on the planning team for this project?

As identified on page 5 of Newsletter #1, the team includes:

National Lakeshore:

Dusty Shultz, Superintendent
 Tom Ulrich, Assistant Superintendent
 Michael Duwe, Environmental Specialist/Planner
 Lee Jameson, Facility Manager
 Larry Johnson, Chief Ranger
 Dan Kriebler, Administrative Officer
 Lisa Myers, Chief, Interpretation and Visitor Services
 Steve Yancho, Chief, Natural Resources
 Bruce Huffman, Public Information Officer (Added June 2006)

Midwest Regional Office:

Sandra Washington, Chief, Planning and Compliance

Denver Service Center:

Miki Stuebe, Project Manager (Changed June 2006)
 Craig Cellar, Cultural Resource Specialist
 Nola Chavez, Landscape Architect

Of course, members of the public, through their input in the ways mentioned above, will be involved in the development of alternatives and the planning process.

There is a difference between those who are consulted and those who participate in the actual planning. Previous planning processes did not include stakeholders as participants. Will this process be the same?

All who participate in the public input process are actually participating in the planning process. A distinction is drawn between those who participate as members of the public and those who are members of the planning team that review public input, evaluates options, and selects resulting alternatives. This process is basically the same for all federal planning, including previous efforts at this park. The formal team (described above) and consultants (private contractors and/or governmental representatives) provide specific data or research in support of the planning effort. Stakeholders, also referred to as interested publics, are actively involved in the planning process, but not as members of the planning team.

How will questions and issues about recommended wilderness areas be addressed?

They will be addressed in the Wilderness Study component of the document. Any suggested alternatives for wilderness may be considered.

The 1982 Congressional amendment to the park's enabling legislation requires that the NPS manage the lands in the existing Wilderness Recommendation as wilderness. How can a new GMP change this management?

Because of how the 1982 law addresses the *1981 Wilderness Recommendation*, anything in the GMP/WS/EIS that changes the existing wilderness boundaries cannot be implemented until such time that Congress passes new legislation on wilderness within the National Lakeshore. We cannot change management of those lands identified as wilderness until Congress takes action.

Will the 1981 Wilderness Recommendation be opened for full public review and how will this be done?

The Wilderness Study, a component of the GMP/WS/EIS package, will be open for full public review. This will be a new study, as mentioned above, and we will review the *1981 Wilderness Recommendation* for any pertinent information. Good planning always includes a review of past and concurrent planning efforts. The process will follow all requirements of the National Environmental Policy Act (NEPA) and the Wilderness Act. As we move through the process, the public will be asked for input at many phases.

How would any changes to the 1981 Wilderness Boundary be made? Will they be permanent and binding? If not, what would be required to make them so?

Any changes to the boundaries set in the *1981 Wilderness Recommendation* that might be proposed as a result of this process would be reviewed by the National Park Service Director and forwarded by the Department of the Interior and the Office of Management and Budget to Congress for approval. Once any wilderness boundary changes are passed by Congress, the park would then change our management based upon the new

boundaries. Once the Congressional bill is signed into law by the President, the changes become permanent and binding (Designated Wilderness).

Will any of the GMP alternatives include a net increase/decrease of wilderness at Sleeping Bear Dunes National Lakeshore?

This has yet to be determined. NEPA requires that the existing boundaries be included as one alternative, called the “No-Action” alternative. However, alternatives could also include lesser or greater amounts than in the *1981 Wilderness Recommendation*. Information gathered through public input will be analyzed and incorporated into a full range of alternatives.

At meetings with various groups during the past few years, the National Park Service had said that some areas within the recommended wilderness boundary could be “cherry-stemmed” out from the wilderness boundary as “minor modifications.” However, now you are talking about a Wilderness Study? Why?

“Cherry-stemming” is a method of excluding “non-conforming” uses such as roads from areas proposed as wilderness. Our research determined that minor modifications, such as cherry-stemming, could be made to the boundaries described in the *1981 Wilderness Recommendation*, but that the *total* acres of proposed wilderness could not change significantly without violating the 1982 legislation. Based on our many presentations made to groups in 2004 and 2005, however, the majority of participants favored a comprehensive Wilderness Study, rather than minor modifications.

The Wilderness Study, as part of the GMP and EIS package, will recommend alternatives for wilderness boundaries based on a thorough analysis of wilderness resources and values, potential impacts, and public review and comment.

Why is the Wilderness Study being combined with the GMP? I thought the wilderness issues were going to be resolved first, before the start of a new GMP.

The NPS initially recommended addressing wilderness and then a GMP in sequence. However, in order to complete the process in a timely and cost-effective fashion, we are now proceeding with a combined GMP/WS/EIS. Conducting these planning efforts sequentially would likely stretch out the length of time needed for completion to six years or more, and would nearly double the cost as well. Also, no separate fund source is available to conduct a stand-alone Wilderness Study at this time.

What is an Environmental Impact Statement?

An Environmental Impact Statement (EIS) is a detailed environmental analysis document that is prepared when a proposal or alternatives have the potential for significant impact on the environment. In the National Park Service, GMPs and Wilderness Studies are almost always accompanied by an EIS. It will not be a separate document.