

**Good Fellow Club Youth Camp
Historic Structures Report and Cultural Landscape Report
Phase II: Environmental Assessment**

Indiana Dunes National Lakeshore, Porter, Indiana

Finding of No Significant Impact

Summary

Pursuant to the National Environmental Policy Act (NEPA) and National Park Service (NPS) NEPA guidelines, the NPS prepared an Environmental Assessment (EA) evaluating the potential impacts of proposed improvements to the existing Good Fellow Club Youth Camp in the Indiana Dunes National Lakeshore (INDU). The EA is Phase II of the Historic Structures Report/Cultural Landscape Report, and was required by NPS for the completion of that document. The HSR/CLR was taken to 95% completion in 2006, and it was at that time that the NPS determined that an EA was necessary to adequately assess potential impacts in alternative treatment plans.

The NPS has prepared this EA in compliance with the National Environmental Policy Act of 1969, as amended (NEPA), (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508], the National Historic Preservation Act of 1966, as amended (NHPA), the Advisory Council on Historic Preservation's (ACHP) implementation regulations for Section 106, implementation regulations for 36 CFR Part 800 *Protection of Historic Properties* and the NPS Director's Order -12 (as reflected in the DO-12 Handbook).

Park Information

The National Lakeshore is located in Northwest Indiana along the shore of Lake Michigan between Gary and Michigan City, approximately fifty miles southeast of Chicago. It is loosely bounded by Lake Michigan to the north and US 20 to the south, and is separated into the East and West units with several small noncontiguous satellite areas. A variety of residential, commercial, and industrial developments abut the National Lakeshore boundaries, including several communities that are completely surrounded by National Lakeshore land.

The endeavors of local and regional constituents to protect the Indiana dunes began in 1899. However, it was not until 1966 that Congress designated Indiana Dunes National Lakeshore as a unit of the national park system. While the National Lakeshore's authorizing legislation included only 8,330 acres of land, four subsequent expansion bills increased its size to more than 15,000 acres, including the 2,182-acre Indiana Dunes State Park which is managed by the Indiana Department of Natural Resources.

Introduction

The Good Fellow Club Youth Camp was the site of a summer camp operated by the Good Fellow Club of U.S. Steel's Gary Works from 1941 to 1976. The camp was created to provide outdoor recreation for the children of the Gary Works employees. In addition to its recreational purpose, the camp was seen as a social, physical, and moral benefit for the children - an idea derived from the progressive labor movements and welfare capitalism of the early twentieth century. In addition to organized sports and crafts the activities of the camp emphasized an appreciation of the natural environment. Although the

NPS purchased the property in 1977 funding for extensive maintenance and repairs did not become available until the 1990s. In 1993 a survey of the site determined that it was potentially eligible for listing on the National Register of Historic Places due to its association with regional industrial history.

It is the intention of the NPS to develop the site in a manner that protects its historic character and sense of place while rehabilitating its historic buildings and landscape features. This proposed expansion is the subject of the Environmental Assessment (EA). The EA is Phase II of the previously completed Historic Structures Report/Cultural Landscape Report. The combined HSR/CLR and EA is intended to guide long term cultural resource and environmental resource management of the Good Fellow Club Youth Camp and was prepared reflecting the interconnected nature of the cultural resources and natural resources of the camp, both physically and in terms of function. The HSR/CLR details the significance of the landscape as the setting for the Good Fellow Club Youth Camp as well as the significance of the buildings and recreational features. The EA concentrates on the potential impacts to the historic and natural resources at the Good Fellow Club Youth Camp.

The EA identifies three action alternatives and determines the potential impacts and recommended mitigation measures related to their implementation. The EA also identifies a No Action Alternative and a preferred alternative as required by the Council on Environmental Quality (CEQ). The EA addresses short-term construction-related impacts and long-term effects, as well as the cumulative impacts that would result from this and other projects which have been completed recently, are currently under-development, or are proposed within the project area.

Selected Alternative

Alternative D - Rehabilitate the Historic Good Fellow Club Youth Camp to Accommodate Conferences, Events, and Activities Rental

This alternative assumes a partnership between the NPS and a third party interested in sensitively rehabilitating the Good Fellow Club Youth Camp site for commercial special events and activities rental such as conferences, professional and recreational retreats, and other types of events. Any commercial activity will be addressed in a commercial services plan which the park has initiated. All activities will be in keeping with the plan and appropriate for the site and the surrounding land use. In addition to offering the overall camp landscape as an attraction this alternative will require developing reception areas, kitchen facilities, and overnight lodging, and adaptations for universal accessibility so that the facility could host events for clients with disabilities. Existing historic buildings will be adaptively reused to accommodate the programmatic needs of the third party. The third party will be permitted to construct additional buildings on the existing concrete pads that mark the former cabin sites. The exterior design of the new buildings will be expected to be contemporary, yet compatible with the historic setting. The level of finish and details of the interiors of new buildings will be permitted to meet the needs and target audience of the facility. Structures currently in use by the Dunes Learning Center (DLC) could be available for the programmatic needs of the new management. Existing uses by the DLC could be relocated. The National Lakeshore remains committed to ensuring that any activities or events of a third party will not be incompatible with the DLC. As portions of the site change there will be negotiations between the NPS and the DLC for alternative uses and locations.

Rehabilitation of the landscape will accommodate the anticipated needs for outdoor activity associated with the facility, such as tented events and recreational opportunities. To that end, this alternative indicates selected clearing of existing woodland within the center of the site and establishment of open turf or meadow for outdoor activities and gatherings. Native woodland plants will be retained and protected and invasive species will be removed. Portions of the cultural landscape could be restored with particular attention to spatial organization and viewsheds from the period of significance. This alternative

retains the overall character of the landscape setting. The existing overflow parking area will be expanded, and there will be continued use of this area by the NPS for festivals and large special events as well as any program needs of the third party. To accommodate recreational needs of guests, this alternative recommends that the swimming pool and pool house be restored and interpreted. Additional recreational trails will be developed within and along the margins of the remaining wooded areas and provide a connection to the DLC, the river, and regional trail networks. Universally accessible paths will be developed between roads, parking, and key destinations.

Missing historic recreational features such as the horseshoe pits and the croquet court are recommended for reestablishment if sufficient historic documentation exists to guide their reconstruction. Historic resources in fair to poor condition will be stabilized to the extent possible, but not integrated into use of the site. Features in degraded condition that cannot be repaired will be documented and removed.

Also, this alternative recommends the documentation, stabilization, and maintenance of the historic retaining wall found along the Little Calumet River and maintenance of the historic stone columns near Howe Road.

In this alternative, to align with Park goals and objectives for all sites, maintenance and management of the Good Fellow Club Youth Camp will follow a set of best management practices developed specifically for the property to promote environmental stewardship and the protection of historic resources. The environmental processes could be interpreted and demonstrated through the use of green technologies.

This alternative will include upgrading and expansion of physical infrastructure at the camp. The existing woodland will be selectively cleared for events but large areas of the encroaching forest will remain. This alternative will provide a wide variety of visitors with both aesthetically and culturally pleasing surroundings and a wide range of beneficial uses of the environment.

The HSR/CLR/EA considered three other alternatives:

Alternative A - No-Action Alternative

Alternative B – Rehabilitate the Historic Good Fellow Club Youth Camp to Accommodate its Traditional Use as a Recreational Camp for Youth

Alternative C - Rehabilitate the Historic Good Fellow Club Youth Camp to Enhance Environmental Learning Opportunities

Alternative A - No Action Alternative -- Under the No Action alternative the park would continue to maintain the existing landscape patterns and features of the Good Fellow Club Youth Camp site in their current condition. The successional oak-hickory woodland that occupies much of the formerly open camp site would remain, and current mowing and vegetation management regimes would continue. Overall treatment of the landscape would focus on maintaining existing conditions. Land uses of the site would continue to include the DLC's use of historic structures and landscape features as noted in the EA.

With the No Action alternative areas of the camp that were open historically but have revegetated would remain in this state of succession. The primary actions involving vegetation management would include the removal of invasive plant species and trees that pose a hazard to buildings and the safety of visitors. Turf and field areas, where they do remain, would continue to be mown and kept clear. Surviving culturally derived plantings such as the white and scotch pines, apple trees, shade trees, and arborvitae would continue to be maintained in their current condition although continued growth of the successional woodland community may interfere with the growth habit and health of some of these plantings over time.

Other management activities that would occur under the No Action alternative include ongoing maintenance of all contributing buildings, structures, circulation, and small-scale features in their current condition. There is special concern for the current condition of the Lodge and the need for rehabilitation in order to adequately protect the historic structure and prevent further deterioration and undermining of the building from water and weather damage. Landscape features that are currently in poor condition, and which are in need of restoration, may not survive under this alternative.

Alternative B – Rehabilitate the Historic Good Fellow Club Youth Camp to Accommodate its Traditional Use as a Recreational Camp for Youth

Under this alternative the NPS, potentially in concert with local partners, would rehabilitate the Good Fellow Club Youth Camp in support of reestablishment of its traditional use as a recreational camp. Rehabilitation would focus on accommodating the contemporary programmatic needs of a relatively rustic camp. Historic landscape features would be retained, maintained, repaired, and/or restored to establish a new camp. Modeled on the historic programs of the Good Fellow Club Youth Camp, the new camp would be active during both the traditional summer period as well as expanded spring and fall shoulder seasons to augment the potential revenue stream. Lost or degraded historic resources that would be desirable components of the new camp, such as cabins, lawn and playing fields, a campfire circle, picnic areas, archery and rifle ranges, a swimming pool, and trail connections to the river would be reestablished based on historic documentation.

Historic documents and records, would guide the rehabilitation and closely approximate the Good Fellow Club Youth Camp's historic operational conditions. While the lodge, former cabins, caretaker's house, and site entrance areas are currently maintained in open vegetative cover, much of the remainder of the formerly open site has been allowed to undergo secondary succession, and is now characterized by a young oak-hickory forest. Under this alternative the successional forest areas would be cleared and returned to a low-growing turf or meadow vegetation, although the forest would be retained in areas identified as important to sensitive plant communities or where there are steep slopes. The DLC would have shared use of the forested area with the NPS and any new uses developed for this alternative. The new vegetative cover type would be selected to meet sustainability criteria such as drought tolerance and low-frequency mowing requirements.

The existing overflow parking site would remain but be managed to retain an unobtrusive character that would be as open and uncluttered as the surrounding landscape. To address any potential impacts to the sensitive slopes and plant communities associated with the river bluffs to the south, a filter strip is recommended for the south edge of the open field on the restored forest edge. Maintenance, and replacement in-kind if necessary of culturally derived historic plantings, including the white and scotch pines, apple trees, shade trees, and arborvitae, is also recommended – but only if these are still considered non invasive. Missing historic plantings, such as the cedars that once flanked the lodge porch, would be replanted.

Under this alternative historic land uses and activities would be reinstated, such as lodging and recreation. Repair and adaptive reuse of historic buildings is recommended to accommodate the needs of the new camp. Every effort would be made to retain the historic character and configuration of contributing buildings and structures, including the Good Fellow Lodge, Pool House, Director's Cabin, Staff Cabin, Pump House, Caretaker's House and Garage, Gatehouse, and steel bridge.

To further support restored use of the site as a camp, new structures would be established on the concrete pads that mark the sites of the former cabins. The design of these structures would be based on either the historic tent cabin structures used by the camp in the 1940s, or the wood cabins present in the 1970s. Interior building character and use would be permitted to deviate from historic uses under this

rehabilitation strategy. Non-contributing structures (sewage pump station, underground reservoir) would be retained and maintained as long as they continued to serve a useful purpose.

Historic site circulation features would be retained, repaired, and maintained in good condition. Deteriorated features such as the flagstone walk and patio associated with the lodge would be repaired, with missing sections reestablished. Historic trails, including access to the river and a boat launch area, would be reestablished based on historic documentation. Universally accessible walks would be established to provide connections between road and parking and the primary features of the camp. Non-historic circulation would be maintained as long as it continues to serve a useful purpose. The DLC will continue to have use of trails through the historic site for programs and hiking.

Surviving historic recreation features, such as the swimming pool, riflery, tennis courts, and checkerboard, are recommended for restoration and reuse by the camp. Missing historic recreation features, such as the baseball diamond, boxing ring, archery range, horseshoe pits, croquet court, basketball court, badminton court and running track are recommended for reestablishment if sufficient historic documentation exists to guide their siting and design, and if they will be used by the camp. Other small scale features that are recommended for repair or reestablishment include the Good Fellow Club Youth Camp sign that hung next to the entrance, the sign on the roof of the gatehouse, the campfire circle south of the steel bridge, and the stone wall along the river. Given the evolution of safety standards for playgrounds since the 1970s, documentation and removal of any surviving equipment is recommended under this alternative. Replacement with contemporary equipment in the same location is recommended.

Also, this alternative recommends the documentation, stabilization and maintenance of the historic retaining wall found along the Little Calumet River and maintenance of the historic stone columns near Howe Road.

Alternative C – Rehabilitate the Historic Good Fellow Club Youth Camp to Enhance Environmental Learning Opportunities

Under this alternative the NPS, engaged in a partnership with a public or private entity and in coordination with the DLC, would rehabilitate the Good Fellow Club Youth Camp site as an environmental education center for programs and activities that would not be incompatible with the adjacent DLC. Surviving historic camp features would be retained, maintained, and adaptively reused, but missing historic elements and patterns of spatial organization would not be reestablished. The successional forest, specialized vegetation communities, and other natural elements of the site would be featured in environmental education programs. Maintenance of the site would follow a set of best management practices developed specifically for the property to promote environmental stewardship and the protection of historic resources. Management strategies would be linked to the educational programs conducted at the site. For example, the successional oak-hickory forest that currently occupies the camp's formerly open grassy field would be studied to record and analyze change over time as an aid to understanding ecological principles and processes. Invasive plants that interfere with native plant communities would be removed and controlled. Native plants that are threatened or provide habitat for local wildlife species of interest would be planted and their associated vegetation communities promoted. Turf grasses would be replaced with native warm season grasses and forbs. Other environmental processes in evidence on the site would be revealed through the interpretation and demonstration of green technologies. For example, stormwater management strategies that promote collection of rainwater for reuse, infiltration of runoff into the groundwater system, and removal of sediments such as rain gardens, filter strips, cisterns, rain barrels, and detention areas would be established in association with building and circulation systems.

Existing historic buildings, such as the lodge, would be rehabilitated to accommodate classroom, meeting, training, laboratory, and family camping uses. The Director's Cabin, Staff Cabin, and Caretaker's House have already been rehabilitated and probably will remain DLC facilities. The Pump House has also been rehabilitated and houses a booster pump and chlorination system for the site's water service.

Rehabilitation of the site and the historic building would adhere to a set of guidelines developed to protect the historic integrity of the National Register-eligible property. In addition, green building principles and technologies would be applied to all aspects of the rehabilitation.

Should the existing buildings and structures prove insufficient to accommodate the needs of the facility, additional lodging, classroom, laboratory, storage, and training facilities would be established using the existing concrete pads that mark the former site of the Good Fellow Club Youth Camp cabins. The architecture and design of the new facilities would be contemporary and compatible with the historic setting, and green building principles would be applied to their construction.

Historic circulation systems would be retained and maintained, while unnecessary non-contributing circulation systems would be removed. The NPS and its partner would explore replacement of impervious pavements with permeable paving systems, and associated stormwater management systems that promote infiltration, detention, cleansing, and collection. Universally accessible trails would be developed to provide connections between roads, parking and primary site destinations. Woodland trails would be established to connect the camp with the river, the DLC, and adjacent park trail and bike trail systems. These trails would be designed to have as little environmental impact as possible.

Former recreational features in poor or unsafe condition, such as the swimming pool, riflery, and playground equipment, would be documented and removed, while other existing historic recreation features would be stabilized and maintained, but not repaired for use. The tennis court site would be adapted for use as an outdoor classroom area.

Also, this alternative recommends the documentation, stabilization and maintenance of the historic retaining wall found along the Little Calumet River and maintenance of the historic stone columns near Howe Road.

Alternatives Considered and Dismissed

A fourth alternative was considered and dismissed as part of the discussions and analysis. This alternative had the NPS as sole manager of the rehabilitation of the Good Fellow Club Youth Camp as well as its operations and costs. This alternative was dismissed because its feasibility was doubtful.

A fifth alternative partnered the NPS and DLC in the rehabilitation of the camp. The surviving contributing features would be protected, maintained, and reused where appropriate to meet the programmatic needs of the DLC. Extant contributing features that would not support the educational program of the DLC would still be preserved for interpretation. This alternative was dismissed because the DLC felt it could not take on the leadership of the Good Fellow Lodge rehabilitation effort, but they would support the Park in its efforts to restore Good Fellow Lodge. With this assessment by DLC, the Park determined that viable alternatives for the EA will have to include development of the lodge through public/private partnership or through a third party.

Environmentally Preferable Alternative

The environmentally preferable alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA, 42 U.S.C.A. § 4321 et seq., Public Law 91- 190

(1970)), which is guided by the Council on Environmental Quality (CEQ). The CEQ provides direction that "[the] environmentally preferable [alternative] is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.
- Ensure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings.
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.
- Preserve important historic, cultural, and natural aspects of our heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.
- Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.
- Enhance the quality of renewable resources and approach the maximum attainable recycling of delectable resources (40 CFR § 1500 et seq.).

The Council on Environmental Quality (CEQ) provides additional direction in its guidance *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations* (1981). "The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative which causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic cultural, and natural resources."

Under **Alternative A**, the park would continue to maintain the existing landscape patterns and features of the Good Fellow Club Youth Camp site in their current condition. Also, Alternative A does not address the purpose and need of the project, including expansion of environmental learning camp facilities and rehabilitation of historic structures and landscape.

Alternative A would not provide for beneficial use of the environment, nor would it provide a sharing of amenities. This alternative would cause the least damage to the biological and physical environment, however, Alternative A would not enhance historic, cultural, and natural resources because no site restoration would occur.

Alternative B proposes the rehabilitation of the historic Good Fellow Club Youth Camp to accommodate its traditional use as a recreational camp for youth. This alternative would provide aesthetically and culturally pleasing surroundings, preserve important historical and cultural resources and through use of green technologies and sustainable design, enhance the quality of renewable resources. There is vegetation removal and soil disruption in this alternative, but mitigation measures would minimize impacts to the surrounding environment.

Alternative C proposes the rehabilitation of the historic Good Fellow Club Youth Camp to enhance environmental learning opportunities. The NPS in partnership would rehabilitate the site as an environmental education center for programs and activities that would not be incompatible with the adjacent DLC programs and activities.

This alternative would preserve the natural resources as they are and provide environmental educational programs specific to the unique vegetation communities and other natural elements of the site. This alternative would provide for beneficial use of the environment and a sharing of amenities. There is some preservation of historic resources in this alternative. The cultural landscape and many historic features of the site would further deteriorate and disappear if Alternative C were implemented. Also visitor use

would be limited to daily programs and overnight lodging for specialized environmental activities and educational uses.

Alternative D Rehabilitation is the environmentally preferable alternative. This alternative proposes rehabilitation of the historic Good Fellow Club Youth Camp to accommodate conferences, events and activities rental. This alternative will preserve and protect many of the historic and cultural resources on the site and allow a variety of visitors to experience the site. Portions of the cultural landscape will be restored as well as spatial organization and viewsheds from the period of significance. The character of the landscape setting will be preserved. It will have facilities and accessibility for clients with special needs and provide diversity and variety of choice. This alternative minimally disrupts some woodland vegetation, however, maintenance and management will follow a set of best management practices developed specifically for the property to promote environmental stewardship and to protect historic resources. Native woodland vegetation will be preserved and invasive plantings removed. This alternative also best meets the stated goals and objectives of the park for the Good Fellow Club Youth Camp.

Therefore, Alternative D best addresses all the criteria presented in Section 101 (b) for the Environmentally Preferable Alternative and best addresses the goals and objectives of the Park.

Why the Selected Alternative Will Not Have a Significant Effect on the Human Environment

1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal Agency believes that on balance the effect will be beneficial.

Alternative D would have a long-term, minor and beneficial impact to cultural resources following the rehabilitation of the historic lodge and other historic structures and portions of the cultural landscape. A short-term, minor and adverse impact would occur only during the construction efforts to rehabilitate these resources on the site. There would be no major adverse impacts to the cultural resources on the site. The changes would improve the overall integrity and condition of the property's contributing features.

2. The degree to which the proposed action affects public health and safety.

Restoration and re-use of some of the recreational features on the site which are currently in a poor state of repair is recommended in Alternative D. This plan recommends the restoration of the historic stainless steel pool and the pool house. The pool is currently neglected and in a poor state of repair. Other smaller recreational features such as the horse shoe pit and croquet court are also recommended for restoration. Features that are not consistent with the programmed use and pose a threat to visitors, such as outdated play equipment are recommended for documentation and removal.

Alternative D also proposes changes to circulation to meet Uniform Federal Accessibility Standards to safely accommodate all visitors to the greatest extent possible. An accessible route is also being provided between the lodge and near-by UFAS accessible parking as well as routes to other areas of educational value. Low level lighting is recommended and achieved with bollard lights placed along strategic visitor circulation routes and parking and only the surface of the walkway or parking would be illuminated. This will not significantly increase light levels through the Good Fellow Club Youth Camp.

To enhance public safety and welfare, Alternative D includes upgrading and expansion of physical infrastructure at the camp. Also the existing woodland would be selectively cleared for events but large areas of the encroaching forest would remain. This alternative would provide a wide variety of visitors with both aesthetically and culturally pleasing and safe surroundings and a wide range of beneficial uses of the environment.

3. Unique characteristics of the Geographic Area such as Proximity to Historic or Cultural Resources, Wild and Scenic Rivers, Ecologically Critical areas, Wetlands or Floodplains, Park Lands and so forth.

Alternative D, the Selected Alternative, does not negatively impact any known historic or cultural resources. The Good Fellow Club Youth Camp lies in the center of Indiana Dunes National Lakeshore which is located in northern Indiana along Lake Michigan. The lakeshore is comprised of over 15,000 acres of dunes, oak savannas, swamps, bogs, marshes, prairies, rivers, and forests. It contains twenty-five miles of Lake Michigan shoreline extending from Gary to Michigan City. Lake Michigan is one of the largest freshwater lakes in the world. Four major dune systems exist within the Lakeshore and include the present lakeshore dunes, the Tolleston dunes, Calumet dunes, and Glenwood dunes. Open beaches, grass covered dune ridges, blowouts, dunes with woody shrub vegetation, pine-forested dunes, oak-forested dunes oak savannas, and prairies all come together to form the Indiana Dunes National Lakeshore. The biological diversity within Indiana Dunes National Lakeshore is amongst the highest per unit area of all the national parks. There are more than 300 species of birds, thirty-seven of mammals, thirty of reptiles, and twenty-two of amphibians. The lakeshore is an especially important feeding and resting area for migrating land and water birds.

4. The degree to which the impacts on the quality of the human environment are likely to be highly controversial.

There were no highly controversial effects on the quality of the human environment identified during either preparation of the Environmental Assessment or the public review period.

5. Degree to which the potential impacts on the quality of the human environment is highly uncertain or involves unique or unknown risks.

Although it is highly unlikely, the rehabilitation of the Lodge and other potential construction projects including circulation paths and plantings could unearth currently unknown archeological resources. There have been two archeological surveys conducted at Good Fellow Club Youth Camp, *Archeologist Rip Report* (1996) and *An Archeological Survey of elected Areas at the Good Fellow Club Youth Camp* (1999). To date no archeological resources have been documented on this site. In the Park agreement with the Deputy State Historic Preservation Officer outlined in the letter received by the Park on June 21, 2010, it states: "It is also our understanding that archaeological investigations (including documentation of the historic features) and a Section 106 review will be completed prior to each individual project."

6. Degree to which the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.

The proposed actions of the Selected Alternative are within the guidelines set by the Park's General Management Plan (GMP) prepared in 1997. This plan establishes management zones for future protection of natural and cultural resources and use of lands within the East Unit of Indiana Dunes National Lakeshore. The Selected Alternative is within this unit and complies with the initial guidance for the area. The GMP describes specific actions such as "the Good Fellow Club Youth Camp will be used to provide overnight environmental education programs; historic Good Fellow Club Youth Camp features that can be incorporated into the environmental education program will be preserved, and the preferred alternative will rehabilitate and adaptively use the lodge and additional existing structures associated with the lodge complex. Other planning documents include: Good Fellow Club Youth Camp *Lodge Reuse Study and Evaluation of the Capacity of the Good Fellow Lodge building*, 1989; Good Fellow Club Youth Camp, *Historic Structures Report and Cultural Landscape Report*, 2005; Indiana Dunes National Lakeshore Division of Interpretation, *The Plan*, 2008; and Indiana Dunes National Lakeshore *Strategic Plan 2007-2011*.

The intent of this combined Historic Structures Report/Cultural Landscape Report and Environmental Assessment is to guide treatment and use of the above ground resources associated with the National

Register eligible Good Fellow Club Youth Camp in Indiana Dunes National Lakeshore. Previous planning documents along with research conducted as part of this HSR/CLR/EA, have helped to guide the development of treatment alternatives and the analysis of their potential impacts. The Selected Alternative does not set a precedent for future actions that may have significant impacts and does not represent a decision in principle about a future consideration.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

Cumulative impacts were determined by combining the impacts of the preferred alternative with other past, present and reasonably foreseeable future actions. Related actions were identified as: The General Management Plan 1997; the Lodge Reuse Study and Evaluation of the Capacity 1989; Good Fellow Club Youth Camp: Development Concept Plan and EA 1995; and the Historic Structures Report/Cultural Landscape Report for Good Fellow Club Youth Camp 2005. Existing and anticipated future projects at Indiana Dunes National Lakeshore and in the surrounding area were also identified in order to determine the potential cumulative impacts. These projects included: the Porter Brickyard Trail; a funding request for *An Area Study for Howe Road*; a future study HSR/CLR/EA for the Bailly Homestead; DLC future plan *Design and Construction of a new Education/Office Building*; NPS future project *Landscape Rehabilitation of the Peter Larson Site*; NPS study for *Reopening the Little Calumet River for Canoes and Kayaks*; the NPS plan for a *Municipal Water Line for Good Fellow Club Youth Camp*; and current NPS plans for *Grading Plans Around the Historic Lodge*.

Cumulatively, implementation of the Selected Alternative of the HSR/CLR/EA and any or all of the other actions is expected to enhance the cultural landscape and built resources by improving conditions and integrity, specifically those related to circulation patterns, spatial organization, historic views, historic structures and historic recreational features. Cumulatively, the implementation of the Selected Alternative does not constitute a significant impact.

8. The degree to which the action may adversely affect historic districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of significant scientific cultural or historical resources.

In 1993, a reconnaissance survey of the Good Fellow Club Youth Camp site determined that it was potentially eligible for listing on the National Register of Historic Places due to its association with regional industrial history. The Camp is located in the Indiana Dunes National Lakeshore in northern Indiana along the south shore of Lake Michigan between Gary and Michigan, Indiana. This is approximately fifty miles southeast of Chicago. The camp consists of wooded and open areas, historic camp buildings, and site recreational facilities. The camp was designed by U.S. Steel engineers to provide recreational and educational opportunities for the employees' children. Built starting in 1941, the camp embodies visions of an Adirondack style summer camp, including a rural, rustic character that blends with the natural environment. Alternative D, the Selected Alternative would improve the overall integrity of the Camp by restoring missing pieces of the cultural landscape, rehabilitating the Lodge and other historic structures and recreational facilities. To date no archeological resources have been documented on this site. In the Park agreement with the Deputy State Historic Preservation Officer outlined in the letter received by the Park on June 21, 2010, it states: "It is also our understanding that archaeological investigations (including documentation of the historic features) and a Section 106 review will be completed prior to each individual project." This assures ongoing NPS consultation with the SHPO during the course of the implementation of the preferred alternative. The HSR/CLR/EA will serve the park well as it continues to assess, plan, preserve and interpret the Good Fellow Club Youth Camp and its resources.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

Endangered species information was requested from the U.S. Fish and Wildlife Service on May 1, 2009. In a letter dated May 15, 2009, the Fish And Wildlife Service provided the following information. The good Fellow club Youth Camp site is within the range of the following Federally endangered, threatened, and candidate species: Indiana bat, Karner blue butterfly, Pitcher's thistle, Piping plover and Eastern Massasauga rattlesnake. Of these species, the only one potentially present in the Good Fellow Club Youth Camp vicinity is the Indiana bat because there is no suitable habitat for the other species in that portion of the Lakeshore. The only bat mist net surveys conducted along the East Branch Little Calumet River in the Bailly Unit to date did not capture any bats of any species. A Biological assessment was submitted to the Fish and Wildlife Service and the Park requested initiation of formal consultation under Section 7 of the endangered Species Act of 1973, as amended, even though the environmental assessment concluded that the action is not likely to adversely affect the Indiana bat when all the protective measures outlined in the BA are implemented. Fish and Wildlife Service informed the Park that formal consultation is not necessary for this proposed project because they concurred with the "may affect, not likely to adversely affect" determination concerning the Indiana bat. The FWS concurrence with our determination of may affect, not likely to adversely affect the Indiana bat was stated in a letter dated January 22, 2010, signed by Elizabeth McCloskey for Supervisor Scott E. Pruitt. Section 6.1.7 of the BA lists actions that the Indiana Dunes National Lakeshore will undertake to protect and enhance potential Indiana bat habitat within the Youth camp area and will be protective of the species. The BA is included in the Environmental Assessment.

10. Whether the action threatens a violation of Federal, state, or local law or requirements imposed for the protection of the environment.

The Selected Alternative violates no federal, state, or local law, including environmental protection laws. Proper consultation with the Indiana Department of Natural Resources has been completed.

Public Involvement

Groundwork preparation for the formal scoping process was developed by the Park staff in 2008. During that year a Planning Work Group committee was developed, opening a dialog with stakeholders. The committee met on March 31, 2008, April 15, 2008 and September 3, 2008. The following stakeholders were identified as having an interest in the Good Fellow site: U.S. Steel, former owners and operators of the camp; Friends of Camp Good Fellow, an alumni group; the DLC, residential camp currently using the site and new buildings adjacent to the site; Historic Landmarks Foundation of Indiana, historic preservation organization (now known as Indiana Landmarks); the State Historic Preservation Office, state agency which oversees compliance for historic sites; the Eppley Institute, education agency associated with Indiana University; Bradford Woods, a residential environmental education camp south of Indianapolis and connected with Indiana University; and the Friends of the Indiana Dunes, a local support group for interpretation and education.

To officially initiate the EA, a kickoff meeting was held via conference call on November 3, 2008, which included National Lakeshore staff, Midwest Regional Office staff, and planning team members. Public scoping strategy was part of the agenda and the planning team was given all the notes from the previous meetings held in 2008. A second conference call was held with Park staff and the planning team on November 18, 2008, and key issues were discussed pertaining to partners, project objectives, program requirements, and feasible alternatives. The planning team was tasked to develop the discussed alternatives, and send to the park for review. After reviews and revisions, the alternatives were approved for presentation to stakeholders. Park staff then requested that the planning team come to the park for the formal stakeholder meeting to present the environmental assessment process, schedule, goals and objectives, and the conceptual alternatives. The stakeholder meeting at the Park was held on January 22,

2009. Input from park staff and stakeholders was then incorporated into the alternatives by the planning team. The draft document was made available to the public through the Planning, Environment, and Public Comment (PEPC) website and the Park, and letters of availability sent to stakeholders, agencies, and Indian tribes.

The scoping process continued during the public review period and the scheduled public meeting. Solicitation of comments also continued during the formal review period from agencies and Indian tribes. The Public Meeting was held on July 15, 2009, and alternative concepts were presented and comments solicited. Upon request from stakeholders the public review period was extended for 45 days, and additional comments were posted on the PEPC website. Additional comments were also sent by mail to the Superintendent's office at the Park.

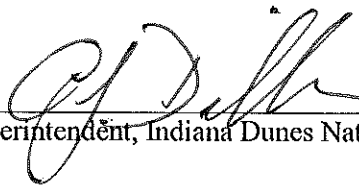
Impairment

In addition to reviewing the list of significance criteria, the NPS has determined that implementation of the proposal will not constitute impairment to the critical resources and values of INDU. This conclusion is based on a thorough analysis of the environmental impacts described in the HSR/CLR/EA, public comment, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies.

Finding of No Significant Impact

Finding of No Significant Impact based on my review of the facts and analysis contained in this Historic Structures Report/Cultural Landscape Report/Environmental Assessment, which is incorporated herein, I conclude that the Selected Alternative for the Good Fellow Club Youth Camp with Indiana Dunes National Lakeshore, Porter, Indiana, would not have a significant impact on the human environment either by itself or considering cumulative impacts. Accordingly, the requirements of the National Environmental Policy Act, regulations promulgated by the President's Council on Environmental Quality, and provisions of National Park Service (NPS) Director's Order-12 and Handbook (Conservation Planning and Environmental Impact Analysis and Decision-Making) have been fulfilled. The Selected Alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement and one will not be prepared. The Selected Alternative will not have a significant effect on the human environment and negative environmental impacts that could occur are primarily minor in intensity. In addition, the Selected Alternative supports the enabling legislation establishing Indiana Dunes National Lakeshore with the intended purpose of preserving for the educational, inspirational, and recreational use of the public certain portions of the Indiana dunes and other areas of scenic, scientific, and historic interest and recreational value in the State of Indiana.

Recommended:




Superintendent, Indiana Dunes National Lakeshore

10/18/10

Date

Approved:



Midwest Regional Director

12-7-2010

Date

**Good Fellow Club Youth Camp
Historic Structures Report and Cultural Landscape Report
Phase II: Environmental Assessment**

Indiana Dunes National Lakeshore, Porter, Indiana

ATTACHMENT 1: DETERMINATION OF IMPAIRMENT

A determination of impairment is made for each of the resource impact topics carried forward and analyzed in the environmental assessment for the preferred alternative. The description of park significance in Chapter One was used as a basis for determination if a resource is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

Impairment determinations are not necessary for visitor experience, socioeconomics, public health and safety, environmental justice, land use, and park operations, etc. because impairment findings relate back to park resources and values. These impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired the same way that an action can impair park resources and values.

NATURAL RESOURCE TOPICS

Soils and Geology

Geologically, the Good Fellow Club Youth Camp site sits atop Lake Border Moraine rather than on dune ridge as is typical of most of the East unit of the park. Moraines are landscapes of knobby hills and kettle shaped valleys created by glacial drift. Lake Border Moraine is also associated with the high ground comprising the Tremont areas of the park. The soils that underlie the Good Fellow Club Youth Camp site include the Morley series in its northern portion and Martinsville series within its central portion. Beyond the site boundary to the south, Fluvaquents series soils occur within the river floodplain and the Del Rey series is associated with the Little Calumet River corridor.

Soil conservation and stability are necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and the Indiana Dunes National Lakeshore were established and are key to the natural integrity and enjoyment of the site and the park. The preferred alternative would result in adverse impacts from tree removal and stump grinding activities and construction activities for the development of the site. These impacts would be localized and short term with specific construction activity. The preferred alternative would not result in impairment, because the impacts are short term and moderate.

Air Quality

Air quality at Indiana Dunes National Lakeshore is of concern due to the park's proximity to industry and the urban centers of Gary, Indiana, as well as Chicago, Illinois, which subject the park to pollution via the prevailing winds. Industrial, commercial, and residential development, power plants, agricultural operations, and highways with heavy motor vehicle traffic in the surrounding area also impact the park's air quality. Air quality in the region of the National Lakeshore is generally poor and does not meet all standards of the Clean Air Act.

Clean air is necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and the Indiana Dunes National Lakeshore were established and is key to the natural integrity and health and enjoyment of the site and the park. The preferred alternative would result in adverse impacts from increased visitation in automobiles and mowing and maintenance of newly cleared lawn areas. Long term impacts would be mitigated by continuing maturation of existing successional woodland and management practices to enhance woodland health and promote development of a stand of higher quality vegetation to benefit the environment. The preferred alternative would not result in impairment, because there would be only negligible impacts.

Water Quality

The Good Fellow Club Youth Camp site is north of the Little Calumet River floodplain. The river, and its floodplain, is approximately sixty feet wide as it meanders north to Lake Michigan. Ephemeral streams and small swales drain into the river from the undulating face of the bluff which separates the floodplain from the level of the camp. The section of the Little Calumet River south of the Good Fellow Club Youth Camp has not been listed as impaired water on the IDEM Final 2006 303d List. Although this segment is not identified as impaired, the upstream segment of the Little Calumet River is listed for a Fish Consumption Advisory (FCA) for mercury and PCBs.

Healthy and clean water quality is necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and the Indiana Dunes National Lakeshore was established and key to the natural integrity and enjoyment of the site and the park. Actions in the preferred alternative include new walks, parking, and event-related facilities as well as removal of selected vegetation that could increase runoff into the river. These impacts would be localized and long term impacts would be mitigated through sustainable design. The preferred alternative would not result in impairment, because there would be only negligible adverse impacts on water quality.

Wetlands

As defined in the preferred alternative, the boundaries of the Good Fellow Club Youth Camp site are Howe Road to the east, camp roads to the north and west, and the bluff above the river to the south. Within this area there are no federally-identified wetlands. The HSR/CLR study for the Good Fellow Club Youth Camp shows a hydromesophytic forest (slough) occurring within the southeastern portion of the floodplain of the Little Calumet River below the project site. A steep bluff separates the project site from the floodplain area. This low, frequently-flooded, area contains sedges, cattails, and shrubs tolerant of flooding.

Preservation of any wetlands is necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and the Indiana Dunes National Lakeshore were established and is key to the natural integrity of the camp and the park. Actions in the preferred alternative within the stated boundaries of the camp site include some woodland removal and addition of impervious pavement associated with new universally accessible walks. These actions would cause an increase in runoff into the offsite slough and the floodplain resulting in a long-term but minor impact. These impacts would be localized and only expected to affect existing wet and frequently flooded areas outside the boundary of the camp. Long term impacts would be mitigated through sustainable design. The preferred alternative would not result in impairment, because there would be only minor adverse impacts on wetlands.

Vegetation

The Good Fellow Club Youth Camp site supports several native plant communities in various stages of succession, as well as culturally-introduced species. Identification of these communities occurred as part of a 1994 plant survey conducted by Barbara Plampin. In 1996 Plampin further surveyed the site to identify significant species or species of special concern - plants potentially falling within the Good

Fellow Club Youth Camp landscape. Most of these were found beyond the site boundaries along the bluff and within the river floodplain. These investigations were useful within the context of a larger park-wide survey conducted in 1990 by Gerould Wilhelm entitled *Special Vegetation of the Indiana Dunes National Lakeshore*.

Healthy, native, vegetation is necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and the Indiana Dunes National Lakeshore were established and is key to the natural integrity and enjoyment of the site and the entire park. The preferred alternative would result in adverse impacts from removal of selected woodland and construction of new visitor access and event features. The preferred alternative would not result in impairment, because there would be only negligible impacts.

Wildlife and Wildlife Habitat

The wide variety of habitats and range of vegetation found within the Indiana Dunes National Lakeshore supports many species of wildlife. Within the Lakeshore surveys have documented 37 species of mammals, 352 species of birds, 18 species of amphibians, and 27 species of reptiles. The park is an especially important feeding and resting area for migrating land and water birds. There currently do not appear to be any wildlife populations or habitats of special importance associated with the Good Fellow Club Youth Camp site. The land to the south of the site, including quality woodlands and the Little Calumet River floodplain, however, are of importance to several wildlife populations.

Maintenance of a wide variety of wildlife and wildlife habitat is necessary to fulfill the purpose for which the Good Fellow Club Youth Camp site and the park were established and are key to the natural integrity of the site and the park. The actions in the preferred alternative (removal of selected existing successional woodland and construction of new visitor access and event features) would result in adverse impacts due to changes in vegetation and the addition of new features on the site. Long term impacts would be mitigated by management practices to protect the higher quality community on the slopes above the floodplain and the wetland area, and by sustainable design. The preferred alternative would not result in impairment, because there would be only minor adverse impacts.

Rare, Threatened, and Endangered Species

Endangered species information was requested from the U.S. Fish and Wildlife Service on May 1, 2009. In a letter dated May 15, 2009, the Fish and Wildlife Service provided the following information. The Good Fellow Club Youth Camp site is within the range of the following Federally endangered, threatened, and candidate species: Indiana bat, Karner blue butterfly, Pitcher's thistle, Piping plover, and Eastern massasauga rattlesnake. Of these species the only one potentially present in the Good Fellow club Youth Camp vicinity is the Indiana bat, because there is no suitable habitat for the other species in that portion of the Lakeshore. A Biological Assessment for the Indiana Bat was submitted to the Fish and Wildlife Service.

Viable populations of special status species are necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and the Indiana Dunes National Lakeshore was established and are key to the natural integrity of the site and the park. The actions in the preferred alternative would have only minor impacts because of additional protective measures required in the Biological Assessment including:

- Avoid disruption of potential roosting areas during the summer season. Tree thinning operations must adhere to the tree cutting restriction dates between April 1 and October 1. Tree thinning operations for the trails, retaining wall, and columns must also adhere to the restricted period between April 1 and October 1. If it is determined that tree clearing or thinning operations must occur during the restricted period a biologist will conduct a mist net survey of the site to demonstrate the presence or absence of Indiana bats.
- Allow larger snags of trees with preferred bark, including ash, elm, hickory, and oak to remain unless they otherwise threaten visitors or other resources.

- Consider opportunities to provide forest edge conditions nearby to support insect foraging.
- Identify suitable migration corridors between summer roosting site and winter hibernation areas, and work to protect their integrity.

The preferred alternative would not result in impairment, because there would be only minor adverse impacts.

Night-Sky Initiative

Protecting the dark night sky is an important goal that takes initiative, public awareness, and concerted efforts aimed at curtailing light pollution. Portions of the Good Fellow Club Youth Camp site are currently lit. Lanterns are located in association with the entrance gates along Howe Road. Several light poles are located along the entrance drive leading to the lodge and beyond, some of which are historic. There are also light poles located elsewhere on the site that no longer function. Wall-mounted lighting is also located at the entrances to some of the buildings. The luminaries are generally not shielded.

Maintenance of the night sky is necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and the Indiana Dunes National Lakeshore were established and is key to the ecological integrity of the camp site and the park. The actions in the preferred alternative (the addition of new lighting to facilitate outdoor activities and to ensure safety of site users at night) would cause long term adverse impacts on the night sky. These impacts would be localized and the long term impacts mitigated by fixture design that diminishes light trespass. The preferred alternative would not result in impairment, because there would be only minor adverse impacts on night skies.

Soundscapes

The natural soundscape of the Good Fellow Club Youth Camp site is generally composed of the natural sounds of winds, rustling vegetation, and animal populations such as frogs and birds. The soundscape is also composed of motor vehicle noise emanating from Howe Road and the entrance and parking areas, and the sounds produced by human visitors. Programmed uses of the Good Fellow Youth Camp are specifically intended to support visitor activities, education, and recreation so human-generated noise is a result of the intended and current use of the site.

Natural soundscapes as well as human generated sounds are necessary to fulfill the purpose for which the Good Fellow Club Youth Camp and Indiana Dunes National Lakeshore were established and are key to the natural integrity of the site. The actions in the preferred alternative including periodic special events and on-going use of the site would cause both short term and long term but minor adverse impacts to the existing natural soundscape. The long term impacts would be mitigated by design and management of programs and events. The preferred alternative would not result in impairment, because there would be only minor adverse impacts on the natural soundscapes.

Aesthetics

Historically the camp site was maintained in open vegetative cover - primarily mown grass and meadow. Woodland species have been allowed to grow up since use of the site as a summer camp ended. The extent of vegetation affects the overall views within the area. Most views are foreshortened or enclosed by surrounding forest. The existing visual environment is defined as what is seen by the visitor during the approach to the Good Fellow Club Youth Camp as well as what is seen by the visitor within the area itself. The visual environment impacts both the anticipation of and experience at the Good Fellow Club Youth Camp.

Maintenance of the quality of the visual environment is necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and the Indiana Dunes National Lakeshore were established and is key to the natural and cultural integrity of the Good Fellow Club Youth Camp. Actions in the preferred alternative include selected woodland removal that would create distinct viewsheds into the site and open

spaces for special use activities. Invasive plants would be removed, which would enhance the aesthetic value of the site. These actions in the preferred alternative would have long term beneficial impacts on the aesthetics of the Camp site and the viewsheds both into and out of the site and the viewsheds within the site. Because there would be only beneficial impacts on aesthetics and viewsheds, the preferred alternative would not result in impairment.

CULTURAL RESOURCE TOPICS

Cultural Landscape

The Good Fellow Club Youth Camp has been documented and evaluated as a cultural landscape and was found to be eligible for listing on the National Register of Historic Places for its contribution to the broad patterns of American History. The surviving characteristics and components of the cultural landscape of the Good Fellow Club Youth Camp contribute greatly to the significance and integrity of the site as it relates to the identified period of significance (ca. 1941-1976). The numerous landscape resources that survive from the identified period of significance include: the landform and topography; grading for the pool and tennis courts; the main drive; access roads to the lodge and caretaker's house; the remnant lodge flagstone walks; the primary parking area; the white and scotch pine plantings; the apple trees and arborvitae trees; lawn and meadow; almost all of the surviving buildings and structures; the steel swimming pool; the steel bridge; and surviving recreational features on the site.

Cultural landscapes are necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and the Indiana Dunes National Lakeshore were established and are key to the cultural integrity of the Good Fellow Club Youth Camp. The actions in the preferred alternative would result in impacts on cultural landscapes that would be localized, long- term to permanent, and generally beneficial. The actions include selected removal of noncontributing woodland, helping to reinstate the historic patterns of spatial organization and views to and from the contributing Lodge structure. The preferred alternative also recommends the adaptive reuse of existing historic structures and recreational features to maintain the integrity of the landscape resources surviving the identified period of significance. The preferred alternative would not result in impairment, because of these beneficial effects. Consultation with the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, concurred with the NPS findings that there are no cultural landscapes within the area of potential effects that will be adversely affected by the preferred alternative.

Historic Resources

The Good Fellow Club Youth Camp is a historic youth camp and recreation area that has been determined eligible for listing on the National Register of Historic Places. The Good Fellow Club Youth Camp is primarily significant for its association with broad patterns of American history. The appreciation for nature and educational aspects of the camp program also are a part of the broader movement to protect and preserve the Indiana Dunes. The rustic architectural design of the camp buildings, in particular the lodge, is a significant aspect of the site and its history. Contributing buildings include: the lodge, gatehouse, caretaker's house, caretaker's garage, pool house, staff cabin, director's cabin, pump house, and utility shed. Contributing structures include: the steel foot bridge; riflery; various structure foundations; entrance limestone wall and columns; river entrance limestone columns and iron gate; stone retaining wall along the river; and the steel swimming pool. There are also contributing site furnishings, camp amenities, and fencing.

Historic resources are necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and Indiana Dunes National Lakeshore were established and are key to the cultural integrity of the site. The actions in the preferred alternative (rehabilitated, preserved, and adaptively reused structures, buildings, site furnishings, camp amenities, and fencing) would result in impacts on historic resources that would be

localized, long-term to permanent, and generally beneficial. The preferred alternative would not result in impairment, because there would be no adverse effects on historic resources. Consultation with the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, concurred with the NPS findings that there are no historic resources within the area of potential effects that will be adversely affected by the preferred alternative.

Archaeology

There have been three archeological surveys conducted at Good Fellow Club Youth Camp, *Archeologists Trip Report* (1966), *An Archeological survey of elected Areas at the Good Fellow Club South Camp* (1999), and (2009). To date no archeological resources have been documented on this site. However, to avoid endangering unknown archeological resources the preferred alternative recommends that areas which are to be disturbed for construction or other activity should be tested by an archeologist before any soil-disturbing activity occurs, and construction activity should be monitored by an archeologist at the time of soil disturbance.

Archeological resources are necessary to fulfill the purposes for which the Good Fellow Club Youth Camp and Indiana Dunes National Lakeshore were established and are key to the cultural integrity of the park. The actions in the preferred alternative would have no impact on known archeological resources. Consultation with the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, concurred with the NPS findings that there are no archaeological resources within the area of potential effects that will be adversely affected by the preferred alternative. The preferred alternative would not result in impairment, because there would be no adverse effects on archeology.