

Environmental Consequences



IMPACTS COMMON TO ALL ALTERNATIVES

The following sections, as required by the National Environmental Policy Act, describe the impacts of implementing the four alternatives. Impacts that are common to all alternatives are described first. Summary comparison tables (tables 3 and 4) of the impacts of implementing the actions common to all alternatives and the alternatives are in "The Alternatives, including the Proposed Action" part of this document.

IMPACTS ON CULTURAL RESOURCES

As suggested in the "The Alternatives, including the Proposed Action" part, the creation of local historic districts through preservation ordinances by local governments would be the most effective means of protecting the historic values of private properties in the park units. Establishing historic district ordinances requires (a) continuing survey activities to document and evaluate historic resources, and (b) community consensus on the benefits of property regulation, the availability of expertise, funding, and citizen participation to develop and administer district ordinances.

Local preservation ordinances can provide the community with important tools for regulating work done to historic properties and for controlling new development so that it is compatible with existing community character. Conversely, if districts and ordinances were not established, development that is inconsistent with the area's historic building patterns could occur. This would diminish the very qualities — compact development, scenic views, and pedestrian scale, among others — that make the area desirable to current residents.

The effective functioning of local historic district ordinances would require substantial commitments of time and interest on the part of local citizens. If local historic district ordinances were enacted without broad community support, the effect could be divisive, impeding overall preservation efforts. Knowledgeable and

committed citizens will need to take leadership roles in developing programs and policies to promote preservation goals. In addition, funding for program staffing may be needed. In communities like Calumet, with small tax bases and increasing expenses, revenues to cover added costs might not be readily available.

IMPACTS ON NATURAL RESOURCES

Threatened and Endangered Species

These alternatives would not likely impact plant species potentially located in the Quincy unit that are currently listed by the state of Michigan as threatened or as species of concern. Should development be proposed in the future, a biological assessment should be prepared before initiating construction activities.

Although there are no plant or animal species identified as threatened or endangered in the Calumet unit, monitoring and assessment should be done periodically to determine whether conditions have changed. This would apply to any new park units or boundary expansions added to the park in future years.

Soils and Hydrology

Park development would probably be in the form of parking area construction, limited road widening, landscaping, structural preservation, and adaptive restoration. No major new NPS construction projects would be anticipated. Construction activities would cause short-term impacts such as noise, soil disturbance, and erosion. Increased paving would cause long-term but minor incremental increases in surface-water runoff. Most construction activity would occur on already disturbed sites.

Much of the short-term construction-related impacts could be effectively mitigated through implementing "best management practices" in

the design and construction phases. The long-term mitigation of development impacts would be best accomplished through comprehensive planning in coordination with the community.

IMPACTS ON THE SOCIOECONOMIC ENVIRONMENT

Like all units of the national park system, Keweenaw National Historical Park does not exist in a vacuum. The local social and economic environment is affected by the existence and management of the park. The creation of the park has contributed to the local interest in historic preservation.

Also, some new businesses have come into being, and existing businesses have benefited from the creation of the park. This phenomenon has occurred in spite of the very limited NPS presence. The park would be another attraction on the peninsula that would contribute to the viability of the local tourism industry.

Although the park does not exist for the social or economic benefit of the local region or the state, it is likely to become an important economic and social asset for both. These important socio-economic relationships will evolve over the years. The partnership concept for this park would ensure that the park and the local communities would become and remain closely connected in the years to come.

Under alternatives 1, 2, 3, and 4 (to a lesser degree), there would be a real possibility that some significant historic resources and aspects of the cultural landscape would be negatively impacted by neglect or inappropriate alteration driven by personal or market forces. Some historic resources might be lost.

IMPACTS ON VISITOR EXPERIENCE AND INTERPRETATION

Actions proposed as common to all alternatives would have a predominately positive effect on interpretation and visitor experience opportuni-

ties in the park. Joint NPS and community action at Osceola #13 mine complex would preserve a significant visual feature related to copper mining and provide an opportunity to interpret the development of mining technology in the modern period.

Partnerships between the National Park Service and other entities could provide more diverse visitor experience opportunities than if each entity operated independently. These partnerships would support NPS interpretive efforts and coordinate historic preservation activities that are critical to visitor understanding and enjoyment of area resources and stories. Comparable standards for visitor services and facilities could be maintained throughout the region. Jointly developed preservation priorities would ensure that the most appropriate resources were selected for prompt attention.

IMPACTS ON PARK ADMINISTRATION AND MANAGEMENT

Proposed Legislative Changes

If the legislation were amended to remove the outright prohibition of acquiring contaminated properties, the National Park Service potentially would have more flexibility in what it could acquire. This could contribute to a higher quality visitor experience and the protection of key resources, especially when other avenues of protection fail.

Possible Acquisition or Management of Contaminated Properties

There would be a potentially significant cost to the National Park Service if it conducts the required pre-acquisition environmental site assessments required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). It is difficult to predict definitively the cost of completing all assessments. Costs would vary depending on the properties identified for potential acquisition. The time involved to accomplish these surveys

would depend on the availability of funds and the number of surveys needed for each property. The purpose of these assessments would be to determine the nature and extent of contamination and then weigh the benefits of acquisition against relevant costs, including the fair market value of the property, remediation costs, and potential damages.

If a decision to acquire contaminated properties is made (assuming the legislation has been amended), the National Park Service must determine whether liability is an issue and how to minimize exposure to potential liability. The probability of a suit or enforcement action by the Environmental Protection Agency or the state is relatively low in light of the EPA evaluation of the risk associated with NPS ownership and/or operation of the properties. Specifically, the record of decision for operable units I and III (which include properties within the park boundary) indicates that the EPA remedy for certain properties would be minimized if the National Park Service acquired the properties.⁶ If the National Park Service acquired the properties, the Environmental Protection Agency would implement soil cover and revegetation in certain areas while conducting no action at other areas.⁷ In addition, long-term monitoring of the affected properties would probably occur.

The National Park Service could minimize potential liability by pursuing a prospective purchaser agreement with the Environmental Protection Agency and the state by which the respective agency would covenant not to sue the National Park Service in the future for liability arising from NPS ownership or operation of currently contaminated properties.⁸ This action

6. See record of decision, pp. 27–28.

7. See record of decision, pp. 44 and 46.

8. The situation presented at the park meets the criteria used by the U.S. Environmental Protection Agency to determine when the use of prospective purchaser agreements is appropriate. See, *Guidance on Agreements with Prospective Purchasers of Contaminated Property*, U.S. Environmental Protection Agency, Office of Enforcement and Compliance Assurance (May 24, 1995).

would avoid some of the liability exposure presented by the Comprehensive Environmental Response, Compensation, and Liability Act and might also potentially avoid the issue presented by 602 DM 2, which is concerned exclusively with sites presenting liability exposure associated with hazardous substances contamination.⁹

Even with a prospective purchaser agreement, some exposure to potential liability and threats to human health and the environment could remain. The National Park Service therefore would need to ensure that all management activities associated with the site would avoid causing disturbance to and possible release of hazardous substances.

This *General Management Plan* also proposes that the National Park Service conduct interpretive activities on property it does not own. While such activity would not be a concern based on the park's establishing legislation and 602 DM 2,¹⁰ CERCLA liability may apply if the National Park Service activities could be interpreted as that of an "operator" of the site. If such activities could be interpreted as exercising significant management control over a property, then under the Comprehensive Environmental Response, Compensation, and Liability Act, the National Park Service may become categorized as a potentially responsible party and could be held responsible for any contamination on that property.¹¹

9. See 602 DM 2. Section 2.2 states in pertinent part, "The requirement of this chapter shall not apply to real property to which liability will not attach, as determined in consultation with the Office of the Solicitor."

10. 602 DM 2 applies exclusively to real property acquisition, defined in section 2.5(B) as "real property obtained either through discretionary acts or when acquired by law, whether by way of condemnation, donation, escheat, right-of-entry, escrow, exchange, lapses, purchase, or transfer and that will be under the jurisdiction or control of the United States for any period of time, however short."

11. The courts reviewing this issue do not generally focus upon control of a facility's general operations but rather focus upon control over hazardous substance issues at a facility, e.g., whether the party controls the disposal of hazardous substances at a landfill. However, as any agreement with present owners of the park properties would

ENVIRONMENTAL CONSEQUENCES

If liability were attached to the National Park Service, the financial implications would be significant and may include: cost of the EPA response activities if liability were established; the cost to implement a remedy to supplement the EPA activities; and costs for reducing risks associated with management activities.

probably enable the National Park Service to conduct some measure of construction and/or remediation activities that would affect hazardous substances, the National Park Service would probably meet a court's criteria for an "operator."

IMPACTS OF IMPLEMENTING ALTERNATIVE 1 — NO ACTION

IMPACTS ON CULTURAL RESOURCES

Minimal staffing levels would limit the National Park Service's ability to implement the cooperative agreements and technical assistance envisioned in the park's establishing legislation, and there would be no way to carry out the legislated provisions for a grant program. The National Park Service could provide minimal additional technical support for the development of local preservation ordinances, and their development would depend primarily on local government and citizen efforts.

The National Park Service could not provide the level of support, coordination, and leadership that would facilitate local actions to protect historic buildings, archeological sites, and historic open space. The National Park Service would also be severely limited in its ability to help local groups or cooperating sites provide interpretation of copper mining history.

If local preservation ordinances were not backed by strong local support and adequate staff and financing, and without a grant program, significant buildings would probably continue to deteriorate and perhaps be lost. New development, without local preservation ordinances and design review process, might result in the destruction of significant archeological resources and important qualities of the historic landscape. The National Park Service would not be able to fulfill its mission of providing for resource protection.

The implementation of this alternative would probably result in damage or loss of some significant historic resources through neglect, incompatible new construction, or poorly thought-out rehabilitations.

Places designated as cooperating sites might benefit from increased recognition, prestige, and visitation because of their defined association and identification with Keweenaw National Historical Park. Because there would probably be no funds available to provide financial assistance

to property owners, significant resources related to the park's story could be lost or seriously impaired.

IMPACTS ON NATURAL RESOURCES

There would not be significant impacts on natural resources as a direct result of NPS actions proposed in this alternative. There would be potential for the disturbance or destruction of wetlands and other open spaces currently in private ownership within park boundaries that could be subject to local development.

IMPACTS ON THE SOCIOECONOMIC ENVIRONMENT

The mission of the National Park Service — to provide for visitor services and to protect the resources — would not be successfully accomplished under this alternative. As a result, the support and enthusiasm of the general public, park partners, and the local community could diminish and might disappear. Economic benefits would be minor, with the annual park budget of about \$216,000 (1996 dollars). Enterprises that had been attracted to the area because of the park and its tourism potential might not choose to remain.

IMPACTS ON VISITOR EXPERIENCE AND INTERPRETATION

This alternative continues a trend of a static or shrinking interpretive budget. NPS reliance on other organizations, especially those managing cooperating sites, to provide most visitor orientation and interpretation services would likewise be continued. As visitation increases in the future, additional demands for visitor services would be imposed on local resources. Sufficient funds would not be available from either the National Park Service or local organizations to preserve, develop, and maintain resources and

ENVIRONMENTAL CONSEQUENCES

facilities necessary to maintain current and future visitor expectations.

Landscapes and structures related to the story of copper would continue to deteriorate or be replaced with modern developments. This loss, combined with previous losses, would cause incremental impacts on the historic integrity of the area's remaining resources. The number and quality of visitor experience opportunities would decline.

IMPACTS ON PARK ADMINISTRATION AND MANAGEMENT

There would be no new impacts under this alternative.

IMPACTS OF IMPLEMENTING ALTERNATIVE 2 — COMMUNITY ASSISTANCE

IMPACTS ON CULTURAL RESOURCES

This alternative would foster protection and interpretation of cultural resources by partners and individual property owners. This alternative would provide for a phased program for the park to build its staffing and funding levels so that the financial and technical assistance programs envisioned in the park legislation could be effectively carried out.

The park staff would eventually be able to provide a broader range of preservation technical and professional services to owners of historic properties. Park staff could also assist in obtaining services, expertise, and donations from non-NPS preservation specialists and scholars. The increased technical and financial support for establishing and implementing local preservation ordinances and a grant program would lead to a more effective and comprehensive local preservation program. As a result, compared to alternative 1, more of the important qualities of historic buildings, sites, and historic landscapes would be protected. There would still be potential for losses of historic properties or damage to their important qualities, but significantly less than in alternative 1.

Increased staffing and funding levels would help improve basic orientation and interpretation of the park story in the park units and in providing assistance to cooperating sites. The park would be able to carry out its legislated educational mission by working with a variety of partners. Programs could be developed that would allow residents to share their understanding of the Keweenaw's historic heritage. Greater appreciation of this heritage would, presumably, foster local support for continued preservation efforts.

Increases in visitation could lead to impacts on fragile cultural resources. Increased traffic (foot or automobile) could also affect the feeling of small-town or rural quiet that residents and visitors alike may value. Increased tourism would

also heighten pressures for developments such as roads, trails, parking lots, and the many services visitors would require for food, lodging, and transportation.

The information in the cultural landscape report and historic resource study would facilitate local preservation planning as well as increase knowledge about the landscape.

Implementing the rehabilitation of any historic building in accordance with federally prescribed preservation standards would avoid compromising the historic values of those buildings.

Some significant historic resources might be negatively and irretrievably impacted if the local preservation ordinances were not implemented and did not receive broad community support.

IMPACTS ON NATURAL RESOURCES

The implementation of ordinances and preservation assistance and some increased visitor services would increase the attractiveness of the park to the public. This would cause a gradual long-term increase in traffic and related emissions in the park units, primarily during the summer season. The overall vehicular emissions on the Keweenaw would not be expected to rise, but the park and immediate surrounding area might experience some small measurable increase in vehicular emissions due to the additional traffic circulating in the units.

IMPACTS ON THE SOCIOECONOMIC ENVIRONMENT

Impacts under this alternative would occur gradually as various elements of the plan are implemented. The long-term gains in employment and park expenditures would accrue to the local economy due to the park being fully staffed and funded at a level of about \$1.08

million annually at full implementation (1996 dollars).

Short-term positive economic benefits in the form of temporary jobs and development expenditures for construction and preservation activities conducted by individuals and organizations would occur under this alternative. Federal grant money would encourage and help support some of these activities. These expenditures would benefit individuals, construction-related firms, and property owners. If federal funds were used to acquire park administrative and visitor orientation facilities, then the affected property owners would benefit from the one-time expenditures.

While some long- and short-term benefits might be significant for a number of individuals and firms, the direct impact on the overall county and regional economies would be minor due to the relative size of these economies. However, locally in Calumet and Quincy, these benefits might be significant.

Some nonmonetary social impacts would also occur. Local interest in historic preservation might be increased. A park visit would increase the public's (local and transient) historical and cultural awareness. Also, educational outreach programs would have a positive effect on school-children and other visiting groups. These impacts would be beneficial for the public and the park.

Expanded operations would aid the tourism industry of the Keweenaw Peninsula. The park, as another attraction on the peninsula, might encourage visitors to stay longer. If so, local businesses and individuals would benefit because a longer stay usually increases tourist expenditures.

NPS activities and programs would complement and supplement local group and individual historic preservation and interpretation efforts. In some cases, NPS actions and technical assistance would be the direct or indirect cause of significant local historic preservation activities.

IMPACTS ON VISITOR EXPERIENCE AND INTERPRETATION

The National Park Service would foster interpretation and resource protection through partners, many of whom have a long history of such activities related to the story of copper mining. NPS technical and financial assistance would expand resource preservation efforts already begun by the private sector and stimulate new efforts. NPS assistance would also enhance basic orientation and interpretation at existing cooperating sites. This alternative would provide more opportunities to visit, understand, and appreciate Keweenaw's significant resources and stories than alternative 1.

This alternative substantially involves the community. Even with NPS assistance, interpretation and the protection of key cultural resources would be primarily the responsibility of private and public landowners. Local communities would shoulder much of the expense of preservation and interpretation to maintain high-quality visitor experience opportunities. The adoption of local ordinances and voluntary compliance through partnerships among local governments and private and public property owners would help ensure the protection of resources necessary for positive visitor experiences. As technical and financial assistance filtered into community activities, greater understanding and appreciation of the park story and resources would encourage more local support for preservation and interpretation. Visitor experience opportunities would be improved and preservation efforts would be advanced — culminating in a more viable park environment than now exists. However, the visitor experience would probably be much less integrated compared to the more traditional national park system unit.

The proposal to establish administrative and orientation functions in the Quincy unit would provide optimum administrative function and improve visitor orientation capabilities.

IMPACTS ON PARK ADMINISTRATION AND MANAGEMENT

Because this alternative proposes an extensive assistance program to achieve objectives, most staff time and park funding would be dedicated to establishing and monitoring the agreements for those properties that received NPS technical and financial assistance.

IMPACTS OF IMPLEMENTING ALTERNATIVE 3 — TRADITIONAL PARK

IMPACTS ON CULTURAL RESOURCES

NPS acquisition of properties within the industrial core areas at Calumet and Quincy would provide for their long-term preservation. The restoration, adaptive reuse, and maintenance of these properties, completed in accordance with accepted standards and federal review processes, would further promote the long-term preservation of such properties.

Without active NPS involvement in the development of local preservation ordinances in the housing and commercial areas, protection of those resources might take longer and there would be potential for the loss of integrity. Also, with very limited technical and financial assistance to those areas, important evidence of the community's social, commercial, and cultural history would receive less emphasis and preservation support, potentially resulting in the loss of historic resources.

The implementation of this alternative might result in gradual damage to or loss of some historic housing, social institutions, and nonindustrial historic landscape values. As a result, resources needed to present a complete and balanced picture of the historic mining communities might be lost. Resources that document the social and domestic lives of workers and managers, community institutions, and the corporate paternalism of the mining companies are major parts of the park story; their neglect or destruction is more likely in this alternative than in alternative 4 because of their location outside the core industrial areas.

IMPACTS ON NATURAL RESOURCES

This alternative would potentially generate higher visibility for the park than alternative 2. This would probably result in more visitation to the park in the long term. For the first three to five years as this plan is implemented, much of the visitation still would come from the

traditional vacationers to the Keweenaw. After full implementation and greater public awareness, the park would also likely generate more park-specific visitation from outside the Keweenaw. This would result in an increase in traffic to the Keweenaw Peninsula and the park, thus causing a long-term but relatively low-level increase in auto exhaust emissions. These increases would not be expected to cause nonattainment of any major air pollution component.

IMPACTS ON THE SOCIOECONOMIC ENVIRONMENT

Impacts from this alternative would occur gradually as various elements of the plan were implemented. The long-term gains in employment and park expenditures would positively benefit the local economy due to the park being fully staffed and funded at a level of about \$2.45 million annually at full implementation (1996 dollars).

Short-term positive economic benefits in the form of increased temporary jobs and development expenditures related to construction and preservation activities conducted by the National Park Service would occur under this alternative. These expenditures would benefit individuals and construction-related firms. One-time expenditures of federal funds to acquire properties in the core industrial areas and grant money allocated to encourage private historic preservation efforts would provide short-term benefits to the affected property owners.

Some long- and short-term benefits might be significant for a number of individuals and firms; however, the direct impact on the overall county and regional economies would be minor due to the relative size of these economies. These benefits might be significant in Calumet and Quincy.

Some nonmonetary social impacts would also occur. Local interest in historic preservation might be increased. A park visit would increase the public's (local and transient) historical and cultural awareness. Also, educational outreach programs would have a positive effect on schoolchildren and other visiting groups. These impacts would be beneficial for the public and the park.

Expanded operations would aid the tourism industry of the Keweenaw Peninsula. The development of the park as a significant NPS presence would create another attraction on the peninsula and might lengthen a visitor's average stay to the peninsula. If so, local businesses and individuals would benefit because a longer average stay usually increases tourist expenditures.

NPS activities and programs would mostly be independent of local group and individual historic preservation and interpretation efforts. Benefits resulting from cumulative actions would be inconsistent and difficult to predict. However, in some cases, NPS actions and technical assistance might be the direct or indirect cause of significant local historic preservation activities (via the historic preservation grant program).

IMPACTS ON VISITOR EXPERIENCE AND INTERPRETATION

This alternative would surpass alternatives 1 and 2 in providing visitor experience opportunities. Existing visitor uses would continue; additional NPS facilities, programs, and services would be available in the park's core industrial areas. A variety of activities and resources would meet the needs of a varied audience seeking different levels of involvement in the park. New, high-quality interpretation and educational media, facilities, and services related to the park's primary themes would be offered by the National Park Service in a limited area.

Upon arrival to the core industrial areas at full implementation, visitors would see stabilized and restored historic structures and landscapes that create a sense of entering a special place and that contribute to understanding and appreciating the

area's cultural integrity. Visitors would find personnel stationed at convenient locations to provide orientation, which would reduce the stress caused by the uncertainty of approaching an unfamiliar area. The National Park Service would have little involvement outside the core industrial areas at Calumet and Quincy. Visitor experience opportunities provided through interpretation and resource protection in those areas would be the responsibility of local communities with limited assistance from federal funding. Differences in funding and staffing between the core industrial area and surrounding areas could create divergent levels of visitor use opportunities and quality of experiences.

Some park user inconvenience would be encountered during stabilization and development of new facilities and media. The disruptions would be short term, and visitor experience opportunities would soon be significantly enhanced by the improvements.

IMPACTS ON PARK ADMINISTRATION AND MANAGEMENT

Because this alternative proposes NPS assistance activities primarily within the core industrial areas of each unit, the number of staff and the percentage of the total park budget dedicated to providing assistance directly or establishing and monitoring cooperative agreements for NPS technical and financial assistance would be less than that described for alternative 2.

IMPACTS OF IMPLEMENTING ALTERNATIVE 4 — PROPOSED ACTION

IMPACTS ON CULTURAL RESOURCES

With the development, over time, of staffing and funding to carry out the technical assistance and grant programs envisioned in the park's enabling legislation, effects on cultural resources would generally be the same as described for alternative 2 and as described under "Impacts Common to All Alternatives" for the local historic district ordinances. With the more comprehensive technical assistance and grant program, however, the social, cultural and commercial aspects of the area's history would be better recognized and preserved within each unit.

In the long run, this alternative would generally provide for increased continuity of preservation in the park as a whole.

IMPACTS ON NATURAL RESOURCES

This alternative would generate the most comprehensive level of protection and interpretation. This would probably generate more visitation than the other alternatives. For the first three to five years, much of the visitation still would come from the current traditional vacationers to the Keweenaw Peninsula. After full implementation and greater public awareness, the park and peninsula are likely to become a new destination for many visitors. This would cause a long-term but relatively low-level increase in auto exhaust emissions. This would not be expected to impact air quality conditions to any extent that would cause nonattainment of any major air pollution component.

IMPACTS ON THE SOCIOECONOMIC ENVIRONMENT

Implementing the preferred alternative would best fulfill the legislative vision for the park and provide for the greatest level of success in accomplishing the resource protection and visitor service missions of the National Park Service.

Impacts from implementing this alternative would occur gradually as various elements of the plan were implemented. The long-term gains in employment and park expenditures would positively benefit the local economy due to the park being fully staffed and funded at a level of about \$1.9 million annually at full implementation (1996 dollars).

Short-term positive economic benefits in the form of increased temporary jobs and development expenditures related to construction and preservation activities conducted by the National Park Service would occur under this alternative. These expenditures would benefit individuals and construction-related firms. One-time expenditures of federal funds to acquire properties in the park units and grant money encouraging private historic preservation efforts would provide short-term benefits to the affected property owners.

Some long and short-term benefits might be significant for a number of individuals and firms; however, the direct impact on the overall county and regional economies might be minor due to the relative size of these economies. However, these benefits might be significant locally in Calumet and Quincy.

Some nonmonetary social impacts would also occur. Local interest in historic preservation might be increased. A park visit would increase the public's (local and transient) historical and cultural awareness. Also, educational outreach programs would have a positive effect on schoolchildren and other visiting groups. There would be a real possibility that significant historic resources and some of the cultural landscape outside the core industrial areas could be preserved through park acquisitions, the historic grant program, and other public and private efforts. These impacts would be beneficial for the public and the park.

Expanded operations would aid the tourism industry of the Keweenaw Peninsula. The park

and a significant NPS presence would create another attraction on the peninsula and might lengthen the duration of a visitor's average stay on the peninsula. If so, local businesses and individuals would benefit because a longer average stay usually increases tourist expenditures.

The preferred alternative would contribute to the growing tourism industry on the Keweenaw Peninsula. Improved programs for preserving resources and developing quality visitor experiences would contribute to the park's status as a *must see* attraction on the peninsula. These programs would complement the local government and private initiatives occurring outside the park, further improving the tourism potential of the area. NPS involvement would increase the regional and national appeal of the peninsula as a tourist destination.

The potential increases in visitation, traffic, and noise levels might diminish the perceived quality of life enjoyed by some current residents.

IMPACTS ON VISITOR EXPERIENCE AND INTERPRETATION

This alternative combines the positive visitor experience opportunities described in alternatives 2 and 3. It eliminates many of the negative impacts of either of those two alternatives standing alone. It would provide the broadest level of resource protection, interpretation, and visitor services and create the optimum opportunity for high-quality visitor experiences.

Partnerships between federal and local interests and resources would increase the ability for the total community to protect significant resources. Visitors would have access to a more comprehensive variety of resources and more opportunities for dispersed use that offers less crowded, more enjoyable experiences.

Increases in federal staffing would significantly enhance the NPS interpretive presence at both the Quincy and Calumet units. Interpretive media and services and centrally located visitor center

orientation/interpretation facilities would result in increased visitor satisfaction and decreased resource damage. Visitors would have the opportunity to choose from many activities to select those appropriate to their own interests. A variety of programs could encourage year-round visitation. Schools and other organized groups would benefit from increased access to specially designed education programs. All visitors, including those with disabilities, would be able to experience through audiovisual media those elements of the story that are not accessible (e.g., underground mining activity).

Some park user inconvenience would be encountered during stabilization and development of new facilities and media. The disruptions would be short term, and visitor experience opportunities would soon be significantly enhanced by the improvements.

CUMULATIVE IMPACTS

A cumulative impact, according to federal regulations, is the impact on the environment of many different actions regardless of what agency (federal or nonfederal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

There would be no significant adverse cumulative impacts on cultural resources anticipated from fully implementing this alternative. The presence of a strong partnership with the community and local governments and an adequately funded local preservation program, combined with NPS preservation and interpretation actions, would provide the best preservation effort for the park's resources.

Because most of Keweenaw National Historical Park would remain primarily in private ownership, there is a high likelihood that there would be cumulative impacts on natural resources within the park boundaries that are a result of actions taken by private owners.

As the park grows and is increasingly seen as a tourist attraction, the various social and economic pressures might result in significant development in and around the park. The mere establishment of the park has already helped generate the development of a new shopping center next to a small wetland in the Calumet unit. This development resulted in a significant amount of paving that has increased surface runoff and interrupted hydrological conditions in that area.

Continued new development, especially on currently open, vegetated sites, would potentially result in the loss of plant and animal habitat, the filling of wetlands, and incremental increases in urban runoff. The long-term impacts would be incremental increases in runoff that, combined with the already significant level of urban development (especially in the Calumet unit), would potentially contribute to soil erosion, flooded streets, and the degradation of stream courses and possibly wetlands. Additional potential impacts include substantially increased automobile traffic levels (and associated noise and pollution) generated by the park, new businesses, and new housing.

Through regulations and preservation ordinances, the community governments could play a major role in guiding this development and limiting its impacts on resources. This would have a positive overall effect on the aesthetic appearance of the cultural landscape and potentially limit levels of new development and its accompanying runoff and erosion.

There would be no significant adverse cumulative impacts anticipated from fully implementing this alternative. Improved interpretive programs and coordination of NPS and local preservation programs would provide the greatest opportunity for compounding the positive effects of individual efforts throughout the region. Combining NPS resources and the resources of local visitor service organizations should provide the best interpretation and visitor service opportunities and a viable national park experience that survives and expands in the future.

IMPACTS ON PARK ADMINISTRATION AND MANAGEMENT

Because this alternative proposes a comprehensive assistance program, which would be broader in scope than in other alternatives, extensive staff time and park funding would have to be dedicated to providing assistance or establishing and monitoring the cooperative agreements for those properties that received NPS technical and financial assistance.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The implementation of the preferred alternative would involve the commitment of capital, energy, materials, and labor to accomplish financial and technical assistance and preservation and adaptive use of historic structures and other cultural resources.

Some indirect effects would be local socio-economic activities stimulated by the implementation of the preferred alternative. These would probably be alterations in land uses in and around the park that might cause loss of cultural landscape values and commitment of natural resources that cannot be recovered for other purposes.

RELATIONSHIP BETWEEN THE LOCAL SHORT-TERM USE OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Because full implementation would take many years, there would be some short-term loss of historic fabric due to the effect of weather and limited maintenance on historic structures. There also might be some minor loss of historic fabric in the process of preserving and adaptively reusing structures.

Public and private resources used for historic and cultural preservation might not result in immediate positive economic impacts for

individuals or firms; however, in the long term, implementation would contribute to the overall enhancement of regional economic productivity and cultural resource conditions within the park boundaries.

UNAVOIDABLE ADVERSE IMPACTS

The gradual development of the park would lead to minor to moderate alterations in the character of the area that for some would be a degradation in quality of life. These effects would include gradual increases in tourist and possibly commuter traffic; increases in air pollution and runoff; increases in property values, which could cause displacement of lower income residents; and new development in and around the park that might degrade current small-town qualities and historic landscape values.

ENERGY REQUIREMENTS AND CONSERVATION POTENTIAL

Energy requirements would increase for those structures currently unused and unheated that would be acquired, preserved, and adapted for park uses or leased for other uses. For some structures currently occupied, preservation and maintenance measures could result in energy-saving modifications. New private development in and around the park would also result in increased energy use.

COMPLIANCE WITH FEDERAL AND STATE LAWS, EXECUTIVE ORDERS, AND REGULATIONS

The following are the laws, regulations, and policies considered in preparing this *General Management Plan / Environmental Assessment* and may potentially require future compliance in implementing the plan.

NATIONAL ENVIRONMENTAL POLICY ACT OF 1969

This act sets forth the federal policy to preserve important historic, cultural, and natural aspects of our national heritage. It requires federal agencies to use a systematic, interdisciplinary approach that integrates natural and social sciences in planning and decision making that may impact the human environment.

The *General Management Plan / Environmental Assessment* were prepared pursuant to this act and its implementing regulations and guidelines. Implementation of this plan will require ongoing adherence to the National Environmental Policy Act.

SECTION 7 — ENDANGERED SPECIES ACT OF 1973

In compliance with the Endangered Species Act of 1973, as amended, the National Park Service initiated informal consultation with the U.S. Fish and Wildlife Service and the Michigan Department of Natural Resources during the development of this plan. The results of this consultation are in the "Affected Environment" part of this document.

Should the National Park Service propose future actions within the park, it will consult and coordinate with the U.S. Fish and Wildlife Service and the state of Michigan to identify and analyze potential impacts on threatened and endangered species and develop mitigation measures. Formal consultation with the U.S. Fish and Wildlife Service will be requested if it is

determined that an NPS action is likely to adversely affect a threatened or endangered species.

EXECUTIVE ORDERS 11988, "FLOODPLAIN MANAGEMENT," AND 11990, "WETLANDS"

Environmental documents would be prepared whenever adverse impacts on floodplains or wetlands could be expected from agency actions. Environmental documents would be made available for public review for not less than 60 days before issuing a finding of no significant impact or a notice of intent to prepare an environmental impact statement. When the action would involve adverse impacts on wetland or floodplain areas, the finding of no significant impact or final environmental impact statement would be coupled with a separate statement of findings document.

SECTION 404, CLEAN WATER ACT

The National Park Service will submit applications for section 404 permits to the Army Corps of Engineers when the agency anticipates the need to discharge dredged or fill material into the waters of the United States, including wetlands and waterways.

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OF 1980 (CERCLA)

This law regulates the cleanup of hazardous or toxic contaminants at closed or abandoned sites. In response to this act, the Department of the Interior's policy set forth in 602 DM 2 states "It is Departmental policy to minimize the potential liability of the Department and its bureaus by acquiring real property that is not contaminated unless directed by the Congress, court mandate,

or as determined by the Secretary." This policy requires the acquiring bureau to conduct preacquisition environmental site assessments (level 1, 2, 3 surveys) to determine the nature and extent of contamination.

Consultations with the NPS Hazardous Waste Management and Pollution Prevention Team of the Field Office Technical Support Center have resulted in serious concerns that the National Park Service's "acquisition of historic mining sites or exercise of significant management control of these sites may further expose the NPS to liability under CERCLA."

ARCHITECTURAL BARRIERS ACT OF 1968 (42 USC 4151 ET SEQ.), REHABILITATION ACT OF 1973 (29 USC 701 ET SEQ.) AS AMENDED, THE AMERICANS WITH DISABILITIES ACT OF 1990 (PUBLIC LAW 101-336, 104 STAT. 327), AND THE UNIFORM FEDERAL ACCESSIBILITY STANDARDS

All programs and facilities developed would be as accessible as possible to visitors with disabilities in keeping with the above laws.

EXECUTIVE ORDER 12898 (FEDERAL ACTIONS TO ADDRESS ENVIRONMENTAL JUSTICE IN MINORITY POPULATIONS AND LOW-INCOME POPULATIONS)

This order requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities.

The alternatives addressed in this planning effort were evaluated, and it was determined that none of these actions would result in significant direct or indirect negative or adverse effects on any minority or low-income population or community. See the impacts discussion in the

"Environmental Assessment" for further discussion.

No statistically significant minority groups are present. The largest group is a variety of Asian nationals in Michigan Technological University graduate school; in each family at least the student is relatively functional in English.

The document will be placed in several libraries and community accessible offices for review. Public meetings will probably be conducted via community access television or distance learning network.

THE SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES

The secretary of the interior is responsible for establishing professional standards and providing advice on the preservation and protection of all cultural resources listed on or eligible for listing on the National Register of Historic Places. *The Secretary of the Interior's Standards for the Treatment of Historic Properties* are prepared under the authority of sections 101(f), (g), and (h) and section 110 of the National Historic Preservation Act of 1966, as amended. The standards apply to all proposed development grant-in-aid projects assisted through the National Historic Preservation Fund and are intended to be applied to a wide variety of resource types, including buildings, sites, structures, objects, and districts. They address four treatments: preservation, rehabilitation, restoration, and reconstruction. These standards, developed in 1992, are codified as 36 *Code of Federal Regulations* (CFR) part 68. They replace earlier versions of 36 CFR 68 entitled *The Secretary of the Interior's Standards for Historic Preservation Projects*. Further, these standards are only regulatory for projects receiving federal grant-in-aid funds. These standards will provide important guidance for the park staff, other agencies and organizations, and individual property owners in making sound preservation decisions and choosing appropriate treatments

for historic properties in Keweenaw National Historical Park.

SECTION 106, THE NATIONAL HISTORIC PRESERVATION ACT OF 1966

Section 106 requires federal agencies to take into account the effects of their actions on properties listed on, or eligible for listing on, the National Register of Historic Places (see table 13), and to give the Advisory Council on Historic Preservation a reasonable opportunity to comment on those actions. Advisory council regulations (36 CFR Part 800) outline procedures and requirements for compliance with section 106, which involve consultation with the state historic preservation officer (SHPO) as well as the advisory council. In keeping with the intent

of the law and regulations, and with the NPS servicewide programmatic agreement of 1995, this plan has been developed with the periodic involvement of a past state historic preservation officer for Michigan. For example, the state historic preservation officer was among the participants in the May 1994 workshop to develop purpose and significance statements. The state historic preservation officer and the advisory council have been kept informed through the park newsletter and the planning briefing booklet, and they have been invited to participate in public meetings. In the September 1995 public meetings, a briefing was held in Lansing that included both the state historic preservation officer and other state officials. SHPO and ACHP comments and advice will continue to be solicited in later planning stages.

TABLE 13: GENERAL MANAGEMENT PLAN PROPOSED ACTIONS AND SECTION 106 REQUIREMENTS

Proposed Action and Affected Resource	Potential Effect	Preservation or Mitigating Measures	Further Compliance Needed
<p>Provide cooperating sites and other owners of historic properties technical assistance for preservation and interpretation through long-term and project-specific partnerships.</p>	<p>Effects not yet defined and varying from site to site; they could range from advice and joint training to financial assistance for preservation work and interpretive programs.</p>	<p>Ensure that appropriate levels of information about cultural resource treatment decisions and try to ensure that work conforms to the <i>Secretary of the Interior's Standards</i>. Facilitate or prepare historic structure reports and other studies where needed to identify significant cultural resource values and elements and to provide direction for treatment activities and for future management.</p>	<p>SHPO and ACHP consultation and review of NPS involvement in actions that are undertaken for section 106 purposes. SHPO and ACHP involvement and advice on the development of any formal agreements with sites.</p>
<p>Acquire or lease and rehabilitate structures for adaptive use as visitor orientation centers and office space; meet accessibility standards and health and safety codes.</p> <p>Open the buildings to visitors.</p> <p>Potentially acquire or otherwise get involved in protection and interpretation of additional structures; some adaptive use and leasebacks possible</p>	<p>If structures can be rehabilitated meeting the <i>Secretary's Standards</i>, no adverse effect from rehabilitation of structures would be expected. Effects of continued visitor use would be monitored. Associated proposals for any additional parking facilities or other development for visitor access would also have to be based on awareness of archeological, cultural landscape, and other cultural resource values that could be affected.</p>	<p>Historic structure reports would guide rehabilitation and architectural treatment of buildings. Work would conform to the <i>Secretary of the Interior's Standards</i>. Exhibit design plans would be developed. Adaptive use for administrative and visitor use would ensure continued maintenance of structures. Visitor use would be monitored to avoid damage to historic values of the structures. Development concept plans and other planning for any needed developments for visitor access (parking, etc.) might necessitate additional studies to identify landscape, archeological, or ethnographic resources that could be affected so that those values could be protected.</p>	<p>SHPO and ACHP review of historic structure reports, exhibit design plans, and preliminary and final design documents to determine nature of effects and appropriate measures for resource protection and avoidance, in accordance with 36 CFR Part 800.</p>
<p>Prepare cultural landscape report, preserve the park's cultural landscapes, and provide interpretive access in the park, where consistent with health, safety, and resource preservation.</p>	<p>Further identification and recognition of important cultural landscape values for purposes of informed management decisions and increased public awareness. Interpretive planning and development would then be based on documentation to avoid potential adverse effects.</p>	<p>Cultural landscape report(s) would guide uses, maintenance, and other management decisions and help preserve significant elements of the landscape.</p> <p>Appropriate archeological investigations would precede any ground-disturbing activities.</p> <p>Visitor use would be managed to avoid damage to the landscapes.</p>	<p>SHPO and ACHP reviews of cultural landscape and archeological reports and proposals and any preliminary design documents.</p>

Proposed Action and Affected Resource	Potential Effect	Preservation or Mitigating Measures	Further Compliance Needed
Study potential boundary expansion at Cliff Mine, Painesdale, and Torch Lake.	Effects are not yet definable, but they are highly unlikely to be adverse.	Any recommended boundary expansion would extend the park's various basic resource preservation and partnership mandates to additional areas.	SHPO and ACHP advice and comment would be sought in the course of boundary studies.
Survey for potential hazardous substances in areas proposed for NPS acquisition.	Potential adverse effects of testing for hazardous substances on archeological and cultural landscape values would need to be considered. Failure to carry out surveys would result in major resources not being considered for NPS acquisition and direct protection.	Some testing would not involve physical disturbance to sites. Some areas might be tested in ways that would not adversely affect cultural resource values.	Potential effects under 36 CFR Part 800 would be discussed with the state historic preservation office and advisory council.
Provide assistance to local jurisdictions to establish local historic districts and preservation ordinances.	Local review of many private projects to provide for preservation, using the <i>Secretary's Standards</i> as the foundation.	Ordinances would promote both preservation of historic properties and compatible design of new development in the key areas of the park, with possibly more flexible standards in other areas. Additional survey needed to establish historic districts would promote public awareness of the community's historic values.	Probably negotiate a programmatic agreement with the state historic preservation office and advisory council to cover any NPS involvement in design review and project approval under the ordinance.
Establish preservation financial assistance (grants) authorized in park legislation.	Would provide a powerful encouragement for preservation projects by private property owners.	Grant criteria would include the <i>Secretary's Standards</i> , and the program would also entail promotional and educational efforts by park staff for local property owners.	Probably negotiate a programmatic agreement with state historic preservation officer and advisory council to cover grant administration.
Assist in preservation of Osceola #13 shaft complex as part of overall community preservation effort.	Would contribute to preservation and public appreciation of more recent copper mining technologies.	HABS/HAER recording project if owner chooses to sell extant machinery.	Would depend on potential effects on any national register and register-eligible properties.
Develop a maintenance facility.	Potential adaptive use of historic structure. See discussion above of historic structure treatments and monitoring use.	See above discussion of need for certain types of information in making decisions about adaptive use.	State historic preservation office and advisory council review as noted in above discussion of historic structures, consistent with 36 CFR Part 800.

CONSULTATION AND COORDINATION

PUBLIC INVOLVEMENT

The National Park Service has provided an ongoing public involvement program to enable the public to participate in the planning process for the Keweenaw National Historical Park general management plan. The first such opportunity occurred in May 1994 when the park's partners and members of the park's advisory commission participated in a three-day workshop to help develop purpose and significance statements for the park as well as identify the major interpretive stories of the park.

In February 1995 a series of public meetings was held in the Calumet and Houghton/Hancock areas to share with the public the results of the May 1994 workshop and ask the public to share with the planning team their dreams and nightmares and future visions of the park.

The first park planning newsletter was distributed to the public in March 1995 and included the purpose and significance statements, the interpretive themes, and a series of vision statements for the future of the park. That newsletter also included a mail-back response form in which the recipients were asked to respond to a series of questions relating to the contents of the newsletter.

May 1995 saw another series of public workshops. The public was asked to help planners determine what specific park stories should be told and where, and what should be the long-range use and management for the various resources in the park.

The information gleaned from the public in all the above workshops and meetings was used by the planning team to develop alternative concepts for the preliminary *Draft General Management Plan*. In August/September 1995, a briefing booklet on the alternative concepts was distributed to the public for review and comment. During the week of September 12, 1995, a series of public meetings was held in Houghton,

Calumet, Marquette, and Lansing to present the preliminary alternative concepts to the general public and to solicit comments. The meetings were well attended and, for the most part, the public was pleased with the five alternatives presented in those meetings.

In February 1996 additional meetings and briefings were conducted in Calumet for members of the advisory commission and the other park partners. During that time, substantial revisions were made to the preliminary draft document, which were reflected in the document provided to the commission and partners in fall 1996.

On December 10 and 11, 1996, representatives of the NPS planning team from the Denver Service Center, the Midwest Field Area in Omaha, Nebraska, and the park met with a variety of individuals to discuss the revised preliminary draft plan. These individuals represented a wide array of the park's partners. Among those in attendance were members of the Quincy Mine Hoist Association, the Calumet national park committee, the Village of Calumet, Calumet Township, and the park's advisory commission; staff representatives of the governor of Michigan, Congressman Bart Stupak, and Senator Carl Levin; and representatives of other park cooperating sites including Coppertown USA, Laurium Manor Inn, Hanka Homestead, the Seaman Mineral Museum at Michigan Tech University, the Keweenaw County Historical Society, and Michigan Tech University.

Many of the comments that were presented to the planning team and other NPS representatives were of a technical nature or a request for clarification of certain elements of the revised preliminary draft plan. It was agreed during the meetings to incorporate virtually all of these comments, as presented.

The more substantive comments presented by the respective groups focused on the revised preliminary draft plan's treatment of the issues

related to hazardous materials and the subsequent impact the presence of such materials would have on a future NPS acquisition program. The primary concern was that the revised preliminary draft plan and its accompanying NEPA document had overstated the potential seriousness of the hazardous material issues and had presented the information in a very negative manner.

Another major concern was the formal recognition and establishment of a workable partnership arrangement for the park. It was felt that the discussion of a partnership in the revised preliminary draft plan proposed a concept that weakened the authority of the park's advisory commission and treated the other partners as "friends of the park" rather than as partners in the park.

Another concern expressed by both cooperating sites representatives and NPS representatives was the need to formalize the informal arrangements between the National Park Service and the individual cooperating sites.

Decisions at the meetings relative to the three major issues of discussion were as follows:

- Hazardous materials issues: The preliminary draft plan will be revised to only state the National Park Service's legal, and departmental and agency policy responsibilities relative to this matter. The National Park Service would also work with the staffs of Congressman Stupak and Senator Levin to revise or delete the more restrictive language in the park's establishing legislation (which currently prohibits acquisition of property that has ever been contaminated).
- Redefining the partnership: A new partnership model was discussed and refined during the meetings. That new model is presented in revised preliminary draft plan.
- Formalizing the concept of cooperating sites: It was agreed at the meetings that the concept of cooperating sites was a valid concept, but

that the relationship between the cooperating sites and the National Park Service needed to be more structured and formalized.

Consequently, the revised preliminary draft plan contains specific criteria to be applied in designating cooperating sites and proposals relative to establishing formal cooperative agreements between the National Park Service and the respective sites. These criteria and agreements will help to clearly define responsibilities and expectations between both parties.

In addition to the above, members of the planning team have participated in each of the park's advisory commission quarterly meetings since the inception of the planning process, as well as meeting, on an informal basis, with other representatives of the park's varied constituencies on numerous occasions.

NPS Attorney/Advisor Shawn Mulligan consulted with U.S. Environmental Protection Agency (Region V) officials and also reviewed EPA administrative records on the Torch Lake NPL site.

The Draft General Management Plan / Environmental Impact Statement was made available to the public on September 1, 1997. Review copies were placed in area libraries and government offices. A newsletter was mailed to the park's mailing list that announced the availability of the document and upcoming public meetings and provided a summary of the proposed action. The official review period was from September 1 through October 31 as officially posted in the *Federal Register*. Two local public meetings were held to give interested parties the opportunity to comment directly to the National Park Service about the *Draft General Management Plan / Environmental Impact Statement*.

The first public meeting was held at Calumet Elementary on the evening of September 22, 1997. About 35 people attended. The park superintendent and planning team members made a short presentation of the key elements of the management plan. Members of the public

then presented their comments. The chairman of the Keweenaw National Historical Park Advisory Commission stated the commission's general support for the draft plan, including the proposed action (alternative 4). Other individuals also offered their general support for the draft document. Additional specific comments and suggestions were recorded.

Some of the major comments included concerns about including a boundary adjustment in alternative 4, and the preference to see this postponed until more analysis was completed.

There was a request that an interpretive theme be developed that reflected the importance of the origins of Keweenaw copper deposits. The community also voiced concern about the park's relationship with Isle Royale National Park. Their desire was to see the Keweenaw superintendent administratively answer to the regional director, not the Isle Royale superintendent. Another comment focused on the state of Michigan and the desire to see it take a role in the park partnership.

The second public meeting was held on the evening of September 23, 1997 at Suomi College in Hancock. About 15 individuals attended. Comments were recorded, and some concerns and ideas were voiced that were not heard at the September 22nd meeting. One concern was about the Keweenaw area outside the park. This person thought that the area needs stronger identification as an area rich in copper-related heritage and should be designated a "heritage area," for example. On the subject of hazardous materials, there was concern that the document could be more positive and reference actions that could be taken to delist the superfund site, of which the park is in the "area of concern." Further, the discussion on ordinances in the plan was perceived by a commenter as overly negative and that the park should have a role in evaluating development proposals based on how that development would impact the visitor experience.

Another person commented on the desire to see the document include a reference for more

historical research on the area. And finally, a statement was made about there being an obligation on the community's part to recognize that the park means something, and this creates an obligation on the part of the community to regulate its development to preserve vistas and the integrity of cultural landscapes and resources.

During the public comment period, seven letters were received. Those letters have been reproduced at the end of this chapter, with corresponding NPS responses also noted. This plan has been revised to respond to public comments and correct mistakes found in the draft plan.

This *General Management Plan / Environmental Impact Statement* is available for a 30-day public review. Following this period, comments will be analyzed, an alternative will be selected, and a record of decision will be issued by the NPS regional director, Midwest Regional Office.

The Keweenaw National Historical Park *General Management Plan / Environmental Impact Statement* is also available for review at:

Keweenaw National Historical Park and Isle Royale National Park offices
Calumet Public Library, 102 Calumet,
Calumet, MI
Hancock Public Library, Hancock High School, Hancock, MI
Olson Library, Northern Michigan University, 1401 Presque Isle, Marquette, MI
Lake Linden-Hubbell Public Library, 601 Calumet, Lake Linden, MI
Michigan Technological University Library, Houghton, MI
Peter White Public Library, 217 North Front Street, Marquette, MI
Portage Lake District Library, 105 Huron, Houghton, MI
Calumet Township Offices, 106 Red Jacket Road, Calumet, MI
Hancock City Manager, City Hall, Hancock, MI
Houghton City Manager, 616 Shelden Ave., Houghton, MI

Village of Calumet Clerk's Office, 340 6th Street, Calumet, MI
Village of Laurium Clerk's Office, 310 Hecla, Laurium, MI

There are a limited number of copies of the *General Management Plan / Environmental Impact Statement* available to the public; requests for copies may be made to the superintendent at the Keweenaw National Historical Park.

LIST OF AGENCIES AND ORGANIZATIONS WHO RECEIVED COPIES OF THE PLAN / ENVIRONMENTAL IMPACT STATEMENT

The document was distributed to the following agencies and organizations. An * indicates that this organization sent written comments on the draft plan.

Federal Agencies / Officials

Advisory Council on Historic Preservation
Environmental Protection Agency, Region V
U.S. Coast Guard Station, Portage
U.S. Fish and Wildlife Service
 East Lansing Field Supervisor
 Great Lakes Coordinating Office
 Seney National Wildlife Refuge
U.S. Senate
 Hon. Spencer Abraham
 Hon. Carl Levin
U.S. House of Representatives
 Hon. Bart Stupak

State Agencies / Officials

Hon. John M. Engler, Governor of Michigan
Hon. Connie Binsfeld, Lieutenant Governor of Michigan
Brian Swift, Office of the Governor, Northern Michigan Representative
Scott Stangeland, Office of the Governor, Administrative Assistant

Michigan Department of Environmental Quality, Superfund Section
Michigan Department of Natural Resources
 Director
Michigan Department of State
 Director, Michigan History Center
 Library of Michigan
 State Historic Preservation Office
Michigan Department of Transportation
Michigan House of Representatives
 Hon. Paul Tesanovich
Michigan Legislature
 Ann Jousma-Miller, Special Assistant
Michigan State Senate
 Hon. Don Kiovisto
Michigan State University Regional Office
Michigan Technological University
 Archives
 Department of Geology
 President
 Seaman Mineral Museum
 Social Sciences
Northern Michigan University, Olson Library
State Parks
 Ron Racine, Manager, F. J. McLain, Baraga, and Twin Lakes State Parks
 Ron Welton, Manager, Porcupine Mountains Wilderness State Park
 Dan Plescher, Manager, Fort Wilkins State Park

City and Local Organizations / Agencies / Officials

C-L-K Public Schools
Calumet Library
Calumet Park Committee*
Calumet Theatre
Calumet Township
Calumet Village
Champion-Lake Superior Land Co.
City of Houghton
City of Hancock*
Copper Range Historical Museum
Coppertown USA Mining Museum
Daily Mining Gazette
Delaware Copper Mine Tours
Franklin Township
Hancock Public Library

Hancock Township
Hanka Homestead
Houghton County Board of Commissioners
Houghton County Historical Society
Isle Royale Natural History Association
Keweenaw Peninsula Chamber of Commerce
and Tourism Council
Keweenaw County Board of Commissioners
Keweenaw County Historical Society
Keweenaw Heritage Center at St. Anne's
Keweenaw National Historical Park Advisory
Commission
Laurium Manor Inn
Osceola Township
Portage Lake District Library
Quincy Mine Hoist Association
Quincy Township
Schoolcraft Township
Society for the Restoration of Old Victoria
Suomi College Maki Library
Torch Lake Township
U.P. Engineers and Architects
Upper Peninsula Firefighters' Memorial
Museum
Upper Peninsula Travel and Recreation Assoc.
Ventures Group
Village of Laurium
Western Upper Peninsula Planning and
Development Regional Commission

**WRITTEN COMMENTS FROM
AGENCIES, ORGANIZATIONS, AND
INDIVIDUALS**

During the public comment period, seven letters were received. Those letters have been reproduced on the following pages, with NPS responses.

Indian Organizations

Keweenaw Bay Indian Community*

Other Organizations

American Lands Conservancy
George Wright Society
Heartland Regional Office, National Parks
and Conservation Association*
Michigan Historic Preservation Network
National Park Foundation
National Parks and Conservation Association
National Trust for Historic Preservation
The Trust for Public Lands
Upper Peninsula Section, Society of Mining
Engineers (formerly American Institute of
Mining and Metallurgical Engineers)

COMMENTS

National Parks
and Conservation Association

HEARTLAND REGIONAL OFFICE

November 3, 1997

Superintendent Frank Fiola
National Park Service
Keweenaw National Historical Park
100 Red Jacket Road, Second Floor
Calumet, MI 49913

Dear Superintendent Fiola:

Thank you for providing the National Parks and Conservation Association (NPCA) with the opportunity to comment on the Keweenaw National Historical Park's Draft General Management Plan and Environmental Impact Statement (GMP/EIS). I wish to submit the following comments for your review.

The GMP accurately depicts the creation of the Keweenaw National Historical Park (Keweenaw) as an example of a true partnership park. It is clear that the legislation creating the park intended that the National Park Service and the Keweenaw community coordinate in an extremely close fashion to protect and interpret park and community resources tied to the story of copper mining on the Keweenaw Peninsula. Although the draft GMP/EIS provides a good framework for discussion of partnering and other management issues, the GMP needs to clarify the definition, structure and implementation of park partnerships and should consider, or reconsider, several key points:

1) What is the proposed legislative "clarification" of authority for the Advisory Commission in order for it to be fully operational? Why is a clarification necessary? The legislation's delineation of commission authority and responsibilities seems clear. The use of the terms "advise" and "assist" in Section 9(a) clearly indicates the advisory commission is expected to play the role of a secondary partner within the park, with more active terms being applied to Section 9(b), indicating the commission is expected to play a much more active role in activities outside park boundaries that are consistent with and benefit the park.

2) Why is it necessary to establish an interim "board of partners" supposedly to fulfill the duties of the as-yet-to-be-determined advisory commission? There is no mandate in the legislation setting a deadline for creation of the commission. An informal partnership arrangement that currently exists does not need to be justified or recognized in the GMP.



Heartland Regional Office
P. O. Box 25354, Woodbury, MN 55125-0354
Tel: (612) 735-8008 • Fax: (612) 735-8008

National Office
1776 Mass. Ave., N.W., Washington, D.C. 20036
Tel: (202) 223-6722 • Fax: (202) 659-0650

RESPONSES

National Parks and Conservation Association, Heartland Regional Office

1. Essentially, the appointing authority of commission members as established in the park's legislation violates the Appointments Clause (Article II, section 2, clause 2) of the U.S. Constitution. President Bush signed the legislation that established Keweenaw National Historical Park with the understanding that the commission would serve only in an advisory capacity and would not exercise any executive authority. The appointing authority of the commission in the park's legislation will require an amendment by Congress to authorize such executive operating authority. The park staff is working on language to submit to Congress for this authorization.
2. An interim board of partners would not be established, and the document has been corrected to reflect this. Park management would focus on empowering the advisory commission as envisioned in the enabling legislation.

COMMENTS

RESPONSES

<p>2</p> <p>If a mechanism is needed to provide funding for private activities benefiting the park, it seems funding can be funnelled to the partners without creating an additional transitional body whose composition and responsibilities potentially conflict with the legislatively-authorized advisory commission.</p>	<p>3)</p> <p>The GMP should more clearly and accurately reflect the NPS's role in park management in relation to its partners. The Advisory Commission, as a clearinghouse or facilitator, should not be viewed as a "first among equals" as described in the GMP. The NPS is an equal partner and arguably holds the ultimate stewardship responsibility within Keweenaw NHP. The depiction of the permanent partnership as a hierarchy gives a misleading impression of the relationship between partners.</p>
<p>4</p> <p>The creation of land use plans promoting development consistent with the vision for park management outlined in the legislation should be a high priority for the NPS and its partners. Perhaps the NPS should consider conditioning federal funding for technical assistance to partners such as local governments upon the adoption of land use plans consistent with park-appropriate development within and outside park boundaries. Cooperative agreements could be used as a tool to help establish and enforce these relationships.</p>	<p>5)</p> <p>There is a potential conflict between provisions in the legislation pertaining to land acquisition and conveyance that must be resolved, especially relating to contaminated properties. The legislation allows the Advisory Commission to acquire real property to further park purposes, presumably within and outside of park boundaries. In turn, the Commission must convey the property as soon as possible to the National Park Service or other appropriate public agency. Conceivably, the Commission could transfer contaminated or potentially-contaminated property to the National Park Service, which is legally prohibited from accepting contaminated properties. Even if the legislation is amended to authorize the National Park Service to acquire contaminated properties if it deems the acquisition appropriate under a cost-benefit analysis, the Service could be deprived of the opportunity to conduct an analysis and make a choice before acquisition if the Commission consciously or unwittingly acquires contaminated properties and conveys them to the NPS under current law.</p>

3. This section of the *General Management Plan* has been revised to reflect a more accurate representation as to the role between the National Park Service and park partners. The National Park Service recognizes its stewardship responsibilities and would exercise its authority in the administration of Keweenaw National Historical Park.
4. Cooperative agreements containing appropriate protective language will be developed and are required for any federal funding authorized by the park.
5. Land acquisition and/or conveyance of contaminated property is a key issue for park management. Park management would work with the advisory commission to establish procedures and protocol for any property the commission anticipates acquiring and conveying to the National Park Service for federal ownership and management.

Thank you for consideration of these comments. I hope the NPS and its partners will refine the GMP to address our concerns. If you have any questions, please feel free to contact me at 612-735-8008. I look forward to working with you as the plan continues to develop.

Sincerely,

 Lori M. Nelson
 Regional Director

COMMENTS

RESPONSES

To: National Park Service
100 Red Jacket Road, Second Floor
Calumet, Mich. 49913
Re: GMP Draft for Keweenaw National Historical Park
Fr: The Calumet National Park Committee

The Calumet National Park Committee

29 October 97

Our group has met six times to digest the new edition of the General Management Plan. We like this draft! It shows a responsiveness of the National Park Service to the concerns of the community. The draft is significantly improved; thus, our comments are quite limited.

1. We appreciate your careful reading of the document. We have made those editorial corrections as appropriate for this final document.

Enclosed is our format of providing three levels of response:

- a) Editorial Revisions b) Questions we have c) Recommendations we propose.

EDITORIAL REVISIONS.

As we reviewed the sections we note the following needs for corrections.

- Page 9 under Cooperating Sites
Keweenaw County Historical SOCIETY MUSEUM SITES is the correct title, not "historical MUSEUM". The society is on the WEB, therefore it is important to have the correct title.
- Page 49, Map # 4 of the Calumet Unit
Several of the numbering's are incorrectly placed on the map; and existing items 19, 20, & 21 are INSIDE the industrial core, not outside of the core district. Our corrections are on the enclosed map.
- Page 50, correct col. 1, Development & use.
- Quincy is appendix F (not G) and Calumet is appendix G (not H)
- Page 56, Alternative 4, Boundary Adjustment
... moving the Boundary three blocks EAST (not west) (Note: We recommend that no boundary adjustments be made at this time. See page 4 of this response.)
- Page 58 Item 9
"conveyed" (Not convey)
- Page 61 Col. 1
Appendix I (not H)
- Page 93, Col 2
Calumet Waterwork Park Add: "...basketball, and nature trail."
Laurium Bicentennial Park Omit: "Offers hookups for recreational vehicles
Substitute: "... offers a tennis court, ice arena, and indoor recreation."
- Page 113, Col 2, Par. #3 Remove the word "transient" and substitute the word "visitor"

COMMENTS

RESPONSES

<p>2</p> <p>Page 12, "Resource Management" page 2</p> <p>What is meant by the statement that "There is no mechanism to determine which facilities are most significant" and how to protect them?</p> <p>a) The Quincy & Calumet support groups have drawn up a joint listing of the top priorities for stabilization. This mechanism is in place & can be operative on an interim basis. Is this what you are looking for?</p> <p>b) Or, does the statement within the draft mean that stabilization must wait until the Historic Structures Reports (p. 64) are complete? If so, how long might that take? Stabilization is a major concern of ours!</p>	<p>2. The National Park Service has an established process to evaluate and prioritize natural and cultural resource projects for funding nationwide. To be considered for funding, this process must be followed. Park management would comply with established procedures for completing the necessary documents as required by NPS policy. The historic resource study and the historic structure report are essential to help identify park priorities. The historic resource study is near completion. The stabilization of critical park resources is a major concern of park management, and those resources requiring immediate attention would be given priority consideration whether or not park documents have been completed.</p>
<p>3</p> <p>Page 44 "Concept", last paragraph</p> <p>This is the proposed alternative # 4. So it is important. What does it mean that "Once the park has a strong technical assistance program, the NPS would begin ... to acquire and protect...?"</p> <p>Are the staff of Ed, Lynn, & Josef the strong technical assistance team? Or what is meant?</p> <p>The above emphasis upon having staff first and then addressing preservation second is often contained within the document. (P. 44, & 49, etc) Is this the proper strategy at this crucial time of stabilization?</p>	<p>3. The preferred alternative would be phased in accordance with available funding and park priorities established in collaboration with the park's advisory commission. The park is committed to meeting its responsibilities as quickly as possible.</p>
<p>4</p> <p>Page 49 under LOCAL PRESERVATION ORDINANCES</p> <p>The second paragraph states "(Such documentation is required before local historic districts and preservation ordinances can be established)"</p> <p>What is meant by this?</p>	<p>4. To develop preservation ordinances compatible with the purposes for which the park was created, documentation and other essential information pertaining to park resources is required.</p>
<p>5</p> <p>Page 155 The Next Steps</p> <p>How are these next steps developed? How will these steps accelerate or hinder the rapid development of this park?</p>	<p>5. The development of the park, which includes the park's interpretive program, depends on funding and would require time to implement. Park management is committed, dependent on funding, to implement park programs, in collaboration with the park's advisory commission, as rapidly as possible.</p>

COMMENTS

RESPONSES

6. Park management is aware of these recommendations for both units of the park and would certainly consult this list in establishing park priorities for preservation and interpretation.

7. This section has been rewritten to provide a future opportunity for the NPS regional director to address this concern.

8. The term "basic" has been removed in reference to visitor facilities in alternatives 3 and 4, but remains appropriate to the concept of alternative 2. The text has been revised to more accurately reflect the type of facility intended.

Our intent is not to imply that one area deserves a quality facility and another does not. Rather, each site has different requirements based on our understanding of how visitors would approach the park and learn about the resources and stories.

The traditional NPS approach to interpretation is to let the resources, such as historic structures and landscapes (with appropriate onsite interpretive support), bring the story alive to visitors, and let visitor centers supplement by interpreting those stories that cannot be told well onsite. This may involve the use of films, models, and exhibits. At Quincy, it is critical that such a facility provide general orientation to and overview interpretation of the Keweenaw Peninsula and Keweenaw National Historical Park. As a first point of contact for many, visitors would need this to help plan their visit. Interpretation specific to Quincy that cannot be told well onsite would also be presented in this facility. The facility at Calumet would be more focused, providing orientation to Calumet and nearby cooperating sites and interpreting those park stories represented by Calumet that cannot be told well onsite. Because of the complexity of the stories at Calumet, some significant interpretation may be necessary at the visitor facility.

Page 3

RECOMMENDATIONS

Page 12 Resource Management

A. Mechanism for determining the significance of buildings.

The Calumet and Quincy Units have jointly identified and prioritized key buildings for preservation and essential interpretation. We recommend: *The NPS will evaluate this list and use it on an interim basis until a "Historic Studies Report" is completed.*

Page 26 Relationship to Isle Royale, paragraph 2.

In the long run, such a relationship diminishes the capacity of KNHP to speak for itself, which we believe will be crucial during future budget negotiations within the NPS.

Also, this language sets the KNHP up for eventually becoming a "Cooperative Site" of Isle Royale.

We are in full agreement that the two parks do not need separate purchasing departments, etc. etc. But new wording about cooperation is needed.

We recommend: *"The superintendent of the KNHP would have full responsibility for managing the park and would administratively answer directly to the regional director. Inter-dependence between the two parks would be extensive, however, and could include shared staff support, joint consultation & budget planning, joint purchasing, resource management, interpretation, and maintenance."*

Page 44 Visitor Experience, Column 2, paragraph 2.

This paragraph constricts Calumet's potential to call upon philanthropists, corporations, and units of government to partnership with us in the development of a first class visitors center!!!! Calumet has the potential for attracting such partnerships but this language regarding a "basic" center would scare such investors away.

Further, the federal legislation, in Sect. 1 Findings & Purposes, items (6) & (7) accents that the integrity of the paternalistic and cultural resources exists in the Calumet Unit. We believe they are best interpreted within the physical setting of Calumet.

We certainly agree that people will be approaching from the south and would benefit from a orientation center in the Quincy Unit. That is not the issue.

Rather, the Calumet Unit has such a complex mix of industry, commerce, ethnic, geological, paternalistic & social history that it requires the time and interpretation that would be provided by a full scale interpretive center.

- more-

COMMENTS

RESPONSES

Our recommendation therefore is:

Page 4

"Eventually, a visitor orientation facility would be established in the Quincy Unit & a visitors interpretive center be established in the Calumet Unit. The orientation facility would provide most visitors approaching from the Houghton-Hancock area a first destination point for general interpretation of the peninsula and specific information about the park's stories, resources, and programs, allowing them to better orient to the park and plan their time. The visitors interpretive center in the Calumet Unit would provide an in depth view of the heart of the peninsula and provide visitors with specific information regarding the complex mix of paternalism, industry, geology, commerce, ethnic and social history that dominates the landscape. At NPS-owned buildings, all visitors, including those with disabilities, would be able to experience through audiovisual media those elements of the story that are not accessible (e.g., underground mining activity).

The language on page 38, under PARK ADMINISTRATION AND OPERATION, and page 56, Alternative 2 should omit the word basic, as it relates to a visitors center. In both places it would then read, "A suitable building (or buildings) in the Calumet unit would function as the administrative headquarters for the park superintendent and staff and also provide visitor interpretation."

8

Page 49 Description of the core district on the map.

Several of the original numberings were incorrect. We have provided a corrected map. We also strongly recommend that the core district be extended to include the Osceola #13 site properties as well as a corridor west of Mine Street to the Osceola #13 site which would include the mine rock piles in that area.

Opponents have wrongly stated that we are "a mining town without a mine". And with the removal of the mine-rock piles in the Quincy Unit (which is now under way) these specific C & H mine rock piles, which contain not only the Amygdaloid but also the Conglomerate types of rock, are of increasing significance.

Page 49, 113, etc. The term "local PRESERVATION ordinances" is used extensively in this draft.

This terminology is not the legal Michigan description of what is meant. The term "preservation ordinances" should be replaced with "... through land use and historic district ordinances." Michigan has numerous laws on the topics of land use and historic districts that will apply to this park.

9

10

9. The numbering corrections have been made. The map does show Osceola #13 as part of the core industrial district. Any corridor along Mine Street will be considered in future public meetings on boundary adjustments.

10. The use of preservation ordinances as terminology throughout the document would not prohibit the implementation of appropriate land use and historic district ordinances within the park under Michigan law. The intent of the existing language is for concept only.

COMMENTS

RESPONSES

<p>11</p> <p>Page 50 2nd col, top paragraph include the location of the park headquarters. P. 5 <i>"In addition, however, as in alternative 3 where the park headquarters are designated for Calumet, alternative 4 proposes that the National Park Service acquire or otherwise take a proactive role....."</i></p>	<p>11. Your concerns are addressed in the following "Park Administration and Operation" section.</p>
<p>12</p> <p>Page 51 Boundary Adjustments. The proposed adjustments listed on page 51 were arbitrarily assigned by park personnel. They have never received a public hearing or discussion. Therefore we recommend that no specific Boundary adjustments be made at this time. Rather, we propose that broad language such as, <i>"The park boundaries shall be re-examined from time to time for possible adjustment."</i> be substituted. Revisions would need to be made on pages 13, 51, 56 and 65 to reflect this general policy.</p>	<p>12. The proposal to adjust the park boundaries as part of alternative 4, the proposed action, has been dropped from this final document. Any consideration of boundary adjustments requires further study and public participation. This has been reflected under the "Future Studies and Plans Needed" chapter.</p>
<p>13</p> <p>Page 53 Co. 1, bottom paragraph <i>Osceola # 13 - Whereas the federal legislation (Page 143, section (7)) includes this mine we recommend a Substitute for the last sentence. "If owners intend to sell the machinery, the National Park Service acquire the complex and the machinery."</i></p>	<p>13. The document has been revised to reflect the park's commitment to work cooperatively with the owner of Osceola #13 and the community to ensure the long-term protection of the complex, including its land, structures, machinery, and rockpiles.</p>
<p>14</p> <p>Page 58 Partnership..... Advisory Commission Since paragraph 1, Col 1, page 59 describes the commission as having authority to carry out historical, educational, & cultural programs....acquire property...etc. why is it described as only "Advisory"? We recommend that it be described as an "OPERATIVE" commission?</p>	<p>14. The terminology for the commission as established in the park's enabling legislation was that of advisory commission; we will continue to use this terminology.</p>
<p>15</p> <p>Page 62 Col 1, last paragraph..... regarding state participation in the partnership We believe the language included in this paragraph is confrontive & will be a hindrance to state participation. We recommend substitute language which both affirms existing state involvement and builds upon the same for increased participation. We urge using the following as a substitute. <i>"The State of Michigan has historically been involved in issues such as transportation, roads, highway signage, economic development, tourism, historic preservation, housing</i></p>	<p>15. The purpose of this section is to be clear that in a partnership there are general expectations of what the different partners would do to help make the park a success. Specific suggestions are outlined only to provide partners ideas given the direction provided by the plan. We understand that the state has its priorities and will provide assistance consistent with what it considers the most effective use of resources.</p>

COMMENTS

RESPONSES

16. The studies and plans listed in the document are either required by law or NPS policy and must be completed. However, emergency stabilization funding can and will be sought when necessary.
17. We have replaced the word "hazards" with "risks," which retains the intent of that phrase.
18. We have added the additional language.
19. We have added the two sentences from the appendix to introduce the C & H Mining Company story.

rehabilitation, and recreational services. Page 6

The involvement of the state in these items can greatly impact the park and enhance the visitor experience at the park.

The park service, local governments, and the State of Michigan have the opportunity to cooperate, pool resources, and coordinate projects that will continue to develop the park and enhance visitor experience throughout the Keweenaw Peninsula."

Pages 64-65, Future Plans and Studies
 These pages represent a major concern. Other parks have been stymied by such language. They appear to be road blocks and a strategy for delaying development.

Some studies will surely be needed. But unless there is a short-cut through these studies the historic facilities now available for preservation and interpretation will disappear and become archaeological digs for future generations to investigate.

Millions of dollars will be required for these studies. Therefore we recommend that the introductory paragraphs indicate that these do not have to all be done prior to stabilization and development.

Page 73 Col 2, paragraph 3 ".... profits and HAZARDS of copper mining..."
 The term "hazards" has EPA overtones. We recommend striking the two words "and hazards": so that the sentence reads "In fact, many sites...testify to the profits of copper mining, to the high failure rate of early entrepreneurs, and..."

Page 73 Col 2, bullet three: Keweenaw County is left out except for the Cliff Mine. We recommend*
 * the Cliff Mine site and other early sites in Keweenaw County: the Champion Mine...."

Page 77 The C & H Mining Company
 We affirm the detailed description of the Quincy Mining Co. as found on page 74. And rejoice that it is found in the body of the text rather than tucked away in the appendix.

We request the same be true for the Calumet & Hecla Co. Therefore, we recommend that two sentences from the appendix on page 139, col 1, paragraph 3 be used to introduce the C & H story:
 "Some 400 copper mining companies operated in the Keweenaw copper district between 1872 and 1920. Of these, the C & H Mining Company represented the greatest product-

COMMENTS

RESPONSES

19	<p>ion, technological development and influence in Michigan copper mining and, for the period 1867-82, for the nation's copper industry." Page 7</p>
20	<p>Page 98 Transportation Access paragraph Omit the word "remote" and substitute "reasonably accessible". Substitute: "The Keweenaw Peninsula is reasonably accessible to the major population...."</p>
21	<p>Pages 112-113 Impacts of Alternative 4 These pages are overly stated! We strongly disagree with them. It sounds as though one would need a ark to get to Ace Hardware or to the grocery store after a rain! Since this is the preferred alternative this needs to be corrected! Please re-write them!</p> <p>First, the state of Michigan has strict laws which control animal habitat, wetlands, flooded streets, soil erosion and the like. The feds do not have to do this!</p> <p>Second, page 114 states, under "Cumulative Impacts" that: "There would be no significant adverse cumulative impacts anticipated...."</p> <p>Third, Page 115 states, under "Unavoidable Adverse Impacts" that: "The gradual development of the park would lead to minor to moderate alterations in the character of the area...."</p> <p>Why then do the following sentences then go on to sound as though we are heading toward Armageddon. We recommend this paragraph also be re-written.</p>

20. We have replaced the term "remote" with "accessible."
21. The National Park Service is required by law and policy to evaluate the potential impacts of proposed actions on the environment. The impact analysis is based on the assumption that the proposed action is fully implemented over the long term. If it is fully implemented, these are likely impacts that are not unusual to the development of a new park in an historic area of this size. The discussion of unavoidable impacts are just that, impacts that are most likely unavoidable given the direction of the proposed action and the nature of the park. These unavoidable impacts are not considered significant given the offsetting beneficial impacts of protecting historic resources and providing a valuable visitor experience.

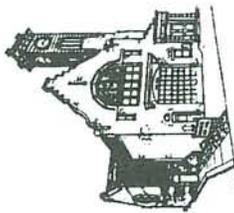
Thank you. If you have questions regarding these comments, please phone me. (906-337-2400)

R. V. Langseth
 Rev. R. V. Langseth, Chair
 P.O. Box 523, Calumet, MI. 49913

Sue Cone	_____	Paul Lehto	_____
Richard Dana	_____	Tom Tikkanen	_____
John Garber	_____	John Vertin	_____
Jackie Jaaskelainen	_____	Marty Oigren	_____

COMMENTS

RESPONSES



City of Hancock
399 Quincy Street
Hancock Michigan 49930

(906) 482-1121
482-2720
FAX (906) 482-7910

September 10, 1997

Mr. Frank C. Fiala
Superintendent
Keweenaw National Historic Park
P.O. Box 471
Calumet, MI 49913-0471

RE: Draft General Management Plan.

Dear Mr. Fiala:

We are writing on behalf of the City of Hancock in general support of the draft management plan recently prepared by the National Park Service. The draft is a much more positive document than the initial draft and we applaud the new direction and substance of the document.

The City of Hancock has one specific concern regarding a comment contained on pages 90 and 91 of the plan. The paragraph references the upgrade of the existing road to the new hospital and high school off of US41 on Quincy Hill. The draft plan indicates that the road may conflict with the park's mission.

It is the City's intent to follow recommendations the Keweenaw National Historic Park made in November of 1995 which acknowledged and accepted the proposed development. The City will incorporate a road alignment that will keep it as far away as practical from the "bathhouse". We will widen the intersection in anticipation of a future traffic signal and design appropriate street lighting to minimize impact. The City will not at this time construct the requested bathhouse parking lot but would consider this item as a future project in cooperation with the Park Service.

Concerning the hospital signage, the City will endeavor to assure a historic but progressive signage as requested by the Park Service.

City of Hancock

We disagree with the city's position that development envisioned and/or planned on Quincy Hill will not conflict with the park's mission. As a park partner, the city has a responsibility to ensure that its development plans and projects will not impact or threaten park resources in the Quincy Mining Company National Historic Landmark District. Park management highly endorses continued communication and exchange of information between the city and the park to ensure that the project's progress is consistent with the purposes for which the park was established.

RESPONSES

COMMENTS

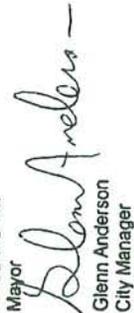
Mr. Frank C. Fiala
September 10, 1997
Page 2.

Therefore, because we are planning to incorporate the recommendations of the Park Service and the support we previously received for the hospital project from the Park Service Superintendent, we do not feel that this road is in conflict with the Park's Mission and request that the reference be deleted from the plan.

Sincerely,

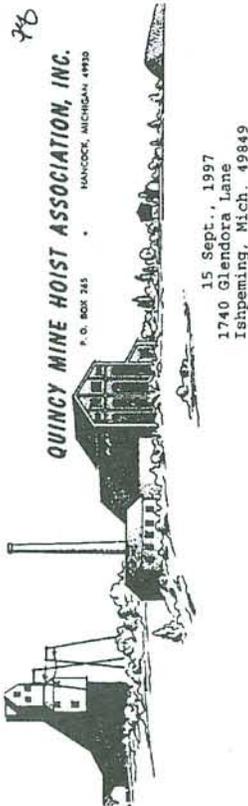
CITY OF HANCOCK


Barbara Clark
Mayor


Glenn Anderson
City Manager

COMMENTS

RESPONSES



Mr. Frank C. Fiala, Supt.
Keweenaw National Historical Park
P.O. Box 471
CALUMET, MI. 49913-0471

Revised General Management Plan

Dear Mr. Fiala:

Recently we received a copy of the Revised General Management Plan for the KNHP. First, may I say, it is a vast improvement over the previous version. Secondly, I suggest, as a matter of style, that the figures be numbered as: Plate 1, or Figure 1.

Other points are as follows:

1. Page v, it is quoted as saying { White, 1991 } : "the mining companies did their best to keep workers from joining unions - by paternalistic services," Unfortunately this is completely false and misleading. The mining companies, in both the copper and iron ranges, developed these practices from economic necessity - This was done to attract and keep good workers. At the time there were no unions nor a threat of unions. I realize this was a guess, but it is a poor and misleading reference. Paternalism is addressed on pages 16 and 138. Perhaps the subject can be set straight there.
2. Page 9. Cooperating Sites. I am sorry to see the Quincy Mine Hoist and Underground Mine listed last. In terms of visitor importance, it should be first.
3. Page 17 Quincy Unit. "Underground operations" I fail to understand the tone of the comments ... that they should be brought, they are now ! Also reference should be made here to the Smelter.
4. Page 70 - Figure - The company Rexnord is no longer in existence. It should be Nordberg Manufacturing.
5. Pages 74 and 75 The Supply House should be mentioned as having been restored as the Visitor Center and Gift Shop. I would like to see a reference in this section to the Quincy Mine Hoist Association as having done all these things as a group of volunteers with the prime objective of saving and restoring the heritage of the Quincy. Also here a

Quincy Mine Hoist Association

1. Based on your comments and others, we have deleted from this final plan "The Experience of Place" section found on pages v and vi in the draft plan.
2. The cooperating sites are listed in alphabetical order.
3. See the "Desired Visitor Experience" section for Quincy in the "Planning Considerations and Process" section for revised language that clarifies the visitor experience of underground operations and adds language about the desired visitor experience of the smelting works.
4. At the time the photograph was taken, Rexnord was the company of record.
5. See the "Industrial Core Area" section of the "Cultural Resources and Related Areas," chapter in the "Affected Environment" for clarification of current uses of the 1895 hoist house and the supply house. Discussion of the tram is found under the next subtitle, "The Quincy Smelter." The volunteer efforts of the Quincy Mine Hoist Association, while very much appreciated, should be recognized and discussed elsewhere and not in this planning document.
6. No comment is required.

COMMENTS

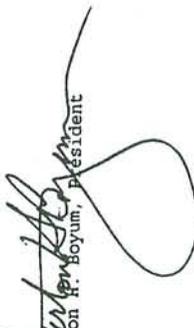
RESPONSES

Page Two GMP

5	
6	description of Michigan's first Cog Wheel Railway, our Tram. 5 6. Page 89 Table 3. We will supply you with the QMHA figures for '95 and '96.
7	7. Page 130 Other Organizations The list should include the Upper Peninsula Section - SME - Society of Mining Engineers, formerly called the American Institute of Mining and Metallurgical Engineers (A.I.M.E.)
8	7. Page 140 Paragraph "One mark" .. There should be a reference here to the QUINCY and TORCH LAKE RAILROAD built in 1888 and 1889, when the hill side trams could no longer handle the tonnage.
9	8. Page 157 QMHA. The Hoist Association was formed in 1957 by the U.P. Section, A.I.M.E. The Hoist association has since purchased the land encompassing the Shaft house, and Hoisthouse, and the Hoist, as well as the Right-of-Way of the Tramway. Page 158. The Pay Office. It has not been purchased by a private business, but is in the process of being acquired by the Hoist Association.
10	9. Page 153 " Copper mining progressed...copper sulfite, this should be copper sulfide.

I hope these minor points help the draftors in their labors.

Respectfully submitted


Burton R. Boyum, President

C:QMHA-300

7. Neither the Upper Peninsula Section, Society of Mining Engineers nor the American Institute of Mining and Metallurgical Engineers were found on mailing lists and therefore did not receive a copy of the draft document. Once an address is located, we will be glad to add them to our mailing list for the final document.
8. Appendix A is not meant to be all-inclusive historically. The subject paragraph simply refers to the smelter development as a significant event in the growth of the company.
9. Appendix F has been revised to include your corrections.
10. Appendix D has been revised to include your corrections.

COMMENTS

KEWEENAW BAY INDIAN COMMUNITY

TRIBAL COUNCIL
 WAYNE SWARTZ, President
 WILLIAM BERRY, Vice-President
 WILLIAM BERRY, Secretary
 TIBAL DONOFIO, Asst. Sec.
 ARY ST. ANGELO, Treasurer

Frank C. Fiala
 Keweenaw National Historical Park
 100 Red Jacket Rd
 Calumet, MI 49913

Dear Mr Fiala:

Keweenaw Bay Tribal Center
 107 Beartown Road
 BiRange, Michigan 49908
 Phone (906) 353-6623
 Fax (906) 353-7540
 29 October 1997

WILLIAM CROSA
 BOBBIE MANNING
 MICHAEL LAFRENDA
 CARY LOONSFORT, Sr.
 SADORIS MIZDAN
 PAULINE TRUMP-SRULICE

We are sending the following comments regarding the draft general management plan for the Keweenaw National Historical Park. The Keweenaw Bay Indian Community is the governmental body for the L'Anse and Ontonagon Indian Reservations. Our ancestors ceded land in Minnesota, Wisconsin and Michigan to the western Upper Peninsula (including all land within the boundaries of the Keweenaw Park) through the Treaty of 1842. We have retained usufructuary rights including the ability to manage and harvest fish, wildlife, and plants within the Treaty area. Our tribal members are presently and will continue exercising these rights in the western Upper Peninsula.

- We have reviewed the management plan and offer the following comments:
- 1) Our views and pre-mining history are absent from the draft plan, such as:
 - a) Copper miners came to this area, because of stories told by Native Americans and copper medals shown to explorers.
 - b) Native Americans assisted explorers by indicating exposed copper masses and shallow excavations in Ontonagon and the Keweenaw.
 - 2) FEDERAL LAW requires any development associated with the Park include archeological explorations and proper protection of Native American burial sites and settlements. We are not satisfied with the statement that these explorations will only occur if funding is available.
 - 3) Tribal members have seen protected animals, such as moose in the Keweenaw. How will the management plan assess and possibly add management in the park?
 - 4) What are the impacts of potential management of the Park on our gathering rights?
 - 5) We certainly applaud your efforts to have cooperative historic sites associated with the Park.
 - 6) All construction contracts are awarded, will we notifiery? Will we be offered other business opportunities associated with the Park?
 - 7) We believe there should be a Native American representative on the Keweenaw Park Advisory Board and we insist you make that recommendation to the Department of Interior?

In closing, we ask you to remember that we lived here before the area was developed for mining. Our ancestors dwelled throughout the Keweenaw and had settlements in Keweenaw and Houghton counties. They created tools and medallions from the native copper. Through the treaty of 1842, our ancestors sold the land to the Federal government which became the mining district. In addition, our ancestors assisted early miners in surviving those first few winters. Greed over economic gain and fear of Native American reprisal caused those early settlers and the Federal government to force our consolidation to the L'Anse and Ontonagon Indian Reservations with the signing of the 1854 treaty. We ask you, as the Park is developed, to tell the story accurately and not let visitors leave the Keweenaw without knowing the Native American lifestyle that existed before the advent of the Copper mining boom.

If you have any questions, future comments should be forwarded to Michael Donofrio (524-5757) from my staff.

Sincerely,

 Wayne Swartz
 Tribal Chairman

C. Mr. Donofrio

LAKE SUPERIOR BAND OF CHIPPEWA INDIANS

RESPONSES

Keweenaw Bay Indian Community

1. The document does discuss some of the prehistoric mining activities of Native Americans and their contribution to the development of the copper mining industry on the Keweenaw Peninsula, but there is certainly more to tell. The contributions made by Native Americans to this story are reflected in the park's interpretive goals and would be expanded on in the park's interpretive program. As the interpretive program is developed, we would consult with you to ensure that the contributions of Native Americans are recognized and accurately conveyed to the public.
2. The National Park Service would follow applicable laws, regulations, and policies in managing the park. The National Park Service would conduct site-specific archeological surveys before any development. Every effort would be made to avoid known resources through design. Should avoidance prove impossible, the National Park Service would work with the state historic preservation office and Native American tribes or groups to develop appropriate mitigative strategies. Should unknown resources be uncovered during construction, work would be stopped in the project area and the National Park Service would consult according to 36 CFR 800.11 and, as appropriate, provisions of the Native American Graves Protection and Repatriation Act.
3. Moose and wolf management is a state function and would remain so within park boundaries. Lands that might be acquired by the National Park Service do not provide suitable habitat for either species.
4. Lands that might be acquired by the National Park Service have little or no potential to provide gathering opportunities. We would consult with you if any future actions may have an impact on gathering sites or resources.

COMMENTS

RESPONSES

5. Cooperative historic sites both within and outside of park boundaries would be a major component of the total interpretive story.
6. When we contract, we send out a presolicitation notice to people who are interested in contracting in addition to the notice that is published in the Commerce Business Daily. Potential contractors return the form if they are interested, and then receive a request for proposal. Also, if the tribe has a firm, or if members of the tribe have a firm, they may qualify under 8-A and can be hired for certain projects without competition. They would have to look into this through the Small Business Administration.
7. The composition of the park's advisory commission is based in the legislation that established Keweenaw National Historical Park. The park management has no authority to recommend or solicit any representation other than that specified by this law. Changes in the composition of the commission would require a change in legislation. Members of the public can write their elected representatives if they have concerns about this.

COMMENTS

RESPONSES

Stephen L. Albee

October 21, 1997

Mr. Frank Fiala,
 Superintendent
 Keweenaw National Historical Park
 100 Red Jacket Road, 2nd Floor
 Calumet, MI 49913

RE: Draft General Management Plan and Environmental Impact Statement

Dear Mr. Fiala:

In reviewing the General Management Plan and Environmental Impact Statement (GMP/EIP), I found it to a vast improvement over a previous effort. I also believe the preferred alternative is very acceptable. It will certainly offer the park's partners no shortage of challenges in its implementation.

I did, however, find four points which I consider to weaken the document. These involve a) the regional dimensions of the park and its impact, b) the hazardous materials issue, c) the negative impacts of economic development activities on the cultural resources, and d) the organization of the governing partnership. I would like to see these points addressed in the final document because it will strengthen the document as well as alert future NPS managers along with the representatives of the other partners that positive mechanisms have been established to address these specific issues.

The regional dimensions of the park: It was ascertained very early in the effort to establish a unit of the National Park System in Michigan's western Upper Peninsula detailing the national significance of the region's copper resources, that having as broad a representative support as possible from within the region was very important. A start was made by the regional planning commission when it developed and designated a series of cultural landscapes which define the region's historical resources. See the attached poster depicting the cultural landscapes. The cultural landscape/heritage area defining the copper related stories is labeled the Lake Superior Copper District. It encompasses a geographical area from the tip of the Keweenaw Peninsula to the Black River area in Gogebic County or for practical purposes to the Michigan-Wisconsin stateline, and it includes Isle Royale.

In the preparation of an earlier draft of the narrative for the GMP, this broader perspective was utilized. However, in this draft the horizon is limited to "the peninsula". I believe it would strengthen the concept of this park to cast it in the context of the entire Lake Superior Copper District. The utilization of the current cooperating sites and possible

Albee

1. Reference to the Lake Superior Copper District has been included under the "Introduction" and in the "Affected Environment." While copper-related sites in this district beyond the Keweenaw Peninsula may contribute to telling the stories relating to our nation's copper mining heritage, the park management and partnership emphasis would remain on the Keweenaw Peninsula. The park's enabling legislation repeatedly identifies the Keweenaw Peninsula as the area of significance, and we take our guidance from this legislation. However, this does not preclude future possibilities for park management and advisory commission to consider cooperative efforts with sites beyond the peninsula.

COMMENTS

RESPONSES

Page 2.

future sites could then be better managed to strengthen the interpretation of the many stories and legends that prevail throughout the copper district. It will also help maintain continued support from constituencies in all parts of the copper district for the park. These are constituencies who over the years have served as the conservators of this heritage, and most recently have supported the establishment of the Keweenaw National Historical Park.

The hazardous materials issue: In the last two years a great deal of work has accomplished to begin developing a remedial actions to cleanup the pollution problems brought on by past industrial activities. The staff of the local Natural Resources Conservation Service (NRCS) office has been engaged in planning a remediation of the milling and smelter waste products left on the landscape. This effort has been in close coordination with the U.S. Environmental Protection Agency.

Community involvement is essential in addressing this issue. In April of this year (1997), the stakeholder groups impacted by this issue elected representatives to a Torch Lake Area Public Action Council. Their charge is to continue the remedial action process, and return the beneficial uses that have been impaired from these hazardous materials. The reason for mentioning this in the GMP is to give notice to all partners that a process is available to address the hazardous materials issue, that mechanisms are in place, and that the process has commenced. See attached materials. Also contact the Statewide Public Action Council representative, Jim Spence, at 487-7757 and the NRCS at 482-0360.

The negative impact of economic development activities on cultural resources: The GMP mentions the need for ordinances and other controls in order to manage and to protect the cultural resources. While some effort has been expended in this area, to date it has brought little results. The drive for economic and community development has had a negative impact on both units of the park and has seriously brought into question their historical integrity. Until such time that the cultural resources can be protected from these types of activities, the GMP needs a standard to judge such activities in terms of whether to support or oppose them.

There is a need to explicitly state such a standard in the GMP. This statement can be developed around the visitor experience concept to the effect that all future proposed community and economic development activities will be evaluated on basis of their impact on the cultural resources and the influence they may have on the current and future visitor experience. Propose activities that suggested a negative impact will be opposed. This is a critical issue and requires a strong stand.

The governing partnership concept: I am a strong advocate of the partnership concept but I think the way it has been laid out in the GMP is too complicated. The idea that one can go from an interim partnership to a permanent partnership is pretty bureaucratic. This approach doesn't address the building of trust among partners. And, it certainly doesn't

2. We appreciate your bringing to our attention the existence of the Torch Lake Area Public Action Council. We have made reference to it in the "Affected Environment." It is helpful to know that there are mechanisms in place that the community can avail itself of in addressing hazardous materials concerns.

3. Impacts related to economic development activities affecting the park would be a primary area of interest for park management. Complicating this issue is the fact that the park, as currently defined, totally consists of private property and, as such, NPS regulations are not applicable. However, for this park to succeed, there is the responsibility, the obligation, and the expectation for all parties involved with the park to consider and to protect park resources. Therefore, a major emphasis by the park, in cooperation with the park's advisory commission, would be to promote the development of ordinances that protect the historic integrity of the cultural resources within the park by the governmental entities having jurisdiction. Federally funded projects occurring within or in the vicinity of the park must comply with both sections 106 and 110(f) of the National Historic Preservation Act. Both the National Historic Preservation Act and the *Secretary of the Interior's Standards for the Treatment of Historic Buildings* would guide park management in managing any developmental activity affecting park resources.

4. The governing partnership concept, as presented, has been rethought and is presented in a more understandable manner in the "A Partnership for the Park and Peninsula" chapter. The National Park Service recognizes that this partnership is critical to the overall management of the park as envisioned by the park's enabling legislation. It is the intent of the National Park Service to develop a partnership with the advisory commission that is as efficient and effective as possible to manage the cultural resources both within and outside park boundaries. This process however must remain flexible and will undoubtedly be refined as the approved *General Management Plan* is implemented.

COMMENTS

RESPONSES

Page 3

take into consideration the dynamics of human relationships. I have a very difficult time discerning a true partnership when we have a word game in progress equating a partnership between "an equal partner" and "first among equals". I think this entire approach needs some serious rethinking.

Thanks for the opportunity to comment on this document.
Sincerely,



Stephen I. Albee, AICP FCP

Enclosures

COMMENTS

RESPONSES



November 4, 1997

Mr. Fraik Fiala
Superintendent
Keweenaw National Historical Park
100 Red Jacket Road
Calumet, MI 49913

Dear Mr. Fiala

I have reviewed the Draft General Management Plan and Environmental Impact Statement for the Keweenaw National Historical Park, Michigan, and respectfully offer the following comments:

p. 19 Change state historic preservation office to State Historic Preservation Office

p. 20 Relationship to Isle Royale National Park

Paragraph two needs to be revised to reflect more accurately the intent of the relationship. The superintendent reports to the regional director. Through an operating agreement with Isle Royale National Park, Keweenaw National Historical Park may employ the administrative services of Isle Royale for budgetary, accounting, payroll, recruiting and other activities.

p. 49 Financial and Technical Assistance

The National Park Service must hasten its assistance to local governments seeking local preservation ordinances. In addition to assisting historic district study committees with defining boundaries and drafting ordinances, rules of procedures and design review guidelines, NPS must assist them in offering education programs. Ongoing education programs must address the benefits of local preservation ordinances and the process for attaining them. Education programs would prepare the communities to support the ordinances.

Alternative 4 must provide a protection alternative to the establishment of local historic districts under ordinance. We have no guarantee that local units of government will enact local preservation ordinances and establish historic districts under them. In addition to aggressively promoting the ordinances, the National Park Service staff must be prepared to offer education programs and design assistance for property owners to use on a volunteer basis. Demonstration projects make excellent models for property owners to follow.

Eckert

1. This section has been revised and hopefully clarified. Isle Royale will continue to provide administrative services to Keweenaw National Historical Park, and the superintendent of Keweenaw National Historical Park will be administratively supervised by the superintendent of Isle Royale National Park. An opportunity for the NPS regional director to review this arrangement will occur when the superintendency of either park becomes vacant. However, both parks are independent, autonomous units of the national park system and managed by separate, independent park managers.
2. The National Park Service realizes the important need to provide both financial and technical assistance to local governments as quickly and as comprehensively as possible. Any financial and/or technical assistance from the park depends upon the federal budgeting process. The park's top priority will be seeking funding levels consistent with and compatible to fulfilling the assistance obligations described in the park's enabling legislation.

A reference to the *Secretary of Interior's Standards for Historic Preservation Projects* has been added to the document.

COMMENTS

RESPONSES

2 New development will occur. The National Park Service must assist local governments in preparing appropriate designs for compatible new construction. When a developer comes to a local government to start a project, the government may refer to these guidelines.

The General Management Plan should reference the Secretary of Interior's Standards for Historic Preservation Projects--better yet, state them.

3. This affordable housing planning document remains a working document that requires further attention before it is finalized. Once completed, it will be an important guide for responding to issues related to worker's housing rehabilitation.

3 p. 80 Workers Housing District

Mention should be made of the worthwhile affordable housing planning document or concept paper that the National Park Service, State Historic Preservation Office, Western Upper Peninsula Planning and Development Office, and outside specialists prepared in response to our concerns about the Housing and Urban Development housing rehabilitations on workers' housing. This could be inserted at the conclusion of the workers housing district discussion on page 81.

4. The text has been corrected.

4 p. 129 State Agencies/Officials

Change Bureau of Michigan History to Michigan Historical Center, delete Michigan Library and Historical Center, delete the second entry for the Michigan Historical Center.

p. 184 Kathryn B. Eckert also authored national register nominations for the Calumet Fire Station and the Calumet and Hecla Historic District.

In my opinion the Keweenaw National Historical Park will soon have a fine General Management Plan and Environmental Impact Statement of which we can be very proud and that will serve us well.

Thank you for the opportunity to comment. If you have questions, you may reach me at 616/256-7662 or 616/256-7880 (fax) or kathyeckert@isul.com.

Sincerely yours,



Kathryn Bislog Eckert

Member, Keweenaw National Historical Park Advisory Commission