

5. CONSULTATION AND COORDINATION

History of Community Participation

Reaching out to the community for ideas and expertise and listening to concerns is an important step in the GMP planning effort. There are many different public agencies, local governments, non-profit organizations and individual citizens having an interest in this plan. Community participation and consultation efforts were ongoing throughout the process of preparing this Draft General Management Plan and Environmental Assessment. Public involvement methods included conducting open house meetings, holding stakeholder meetings, distributing newsletters, posting planning information on appropriate websites, publishing Federal Register notices and sending press releases.

Scoping: Listening to Ideas and Concerns

The Paterson Great Falls NHP GMP planning team launched the GMP planning process in 2011. The official public scoping period opened on November 17, 2011 and closed on March 16, 2012. A comprehensive scoping outreach effort elicited early public comment regarding issues and concerns, the nature and extent of potential environmental impacts, and possible alternatives that should be addressed in the GMP. Through various scoping and outreach activities, NPS welcomed information and suggestions from the public.

In November 2011, the planning team produced the first GMP newsletter. More than 3,000 copies were printed in English, Spanish, Arabic and Bengali. Newsletters were mailed to individuals and organizations on the GMP mailing list out, and distributed throughout the city of Paterson—to visitors at the park, neighbors in local communities, and attendees at open house meetings. The newsletter's purpose was to announce the start of the planning process; to inform the public on how they could participate; and to ask for thoughts, ideas and concerns about future planning, and what issues should be addressed in the GMP. The newsletter

also contained information on the date, time and location of open house meetings.

Announcements and Notices

The scoping newsletters were published and made available for comment on NPS's Planning, Environment and Public Comment (PEPC) website and the park's main website. Additional updates on the GMP were provided on the websites. An email list was also developed and maintained so that the public could receive updated information electronically.



Press releases announcing the GMP planning process were distributed to local newspapers and on local radio. NPS staff worked closely with the city of Paterson to increase outreach on public involvement opportunities. On November 14, 2011, a notice of intent to prepare a general management plan and environmental impact statement was published in the Federal Register. NPS staff posted and maintained announcements regarding the status of the GMP on the park's website and Facebook page.

Open House Meetings

From November 17 to 19, 2011 the planning team held scoping open house meetings at Paterson's Center City Mall, The Brownstone House and the New Jersey Community Development Corporation. Displays and stations were set up at the start of the meetings so that attendees could have one-on-one conversations with

members of the planning team. Planning team members recorded comments on flipcharts and by video.

Community Contributions

Following the open house meetings, the city of Paterson submitted 50 pages of consolidated comments collected from various city department staff. Additional public presentations were held at William Paterson University and Clifton Public Library about the GMP process. Park staff worked with two elementary schools on special projects devoted to the GMP. Paterson's School No. 7 submitted the results of a writing assignment given to their fifth graders, asking what they would like to see in the park. School No. 5 built and submitted photos of models displaying student's ideas for park improvements.

Summary of Scoping Comments

During the scoping period, the park received over 700 hundred comments in a variety of forms. Most comments were from individuals and organizations in New Jersey. A second GMP newsletter, also in Arabic, Bengali, English and Spanish was distributed in November 2012 and provided a summary of comments received, along with a summary of planning issues. The following public comment summary reflects the wide range and diversity of comments received. The foundation for the plan's vision reflects all of these ideas.

Values

One of the sentiments described most frequently was the appreciation of the Great Falls and surrounding natural setting. People value this place for its beauty and serenity and many use this space as a place for solitude and reflection. Others appreciated the opportunity for recreational activities that the area provides including picnicking, hiking, and fishing. Many commenters indicated the NHL district's mill buildings to be of great value and a large number of comments pointed to these buildings as a reminder of how Paterson became such an important part of America's industrial history.

Industrial Connection

Numerous comments referenced the connection between the natural power source of the Great Falls and its industrial connection to Paterson. Many expressed an appreciation of the ingenuity of Alexander Hamilton

and others to harness that power for industrial use. The complete hydroelectric system, including raceways and dams, was of particular interest to many people as a way to interpret and learn about using water as a natural source of energy.

Concerns

Many commenters expressed concern with the overall cleanliness of the park including, the amount of litter and debris found along the banks of the river. Several comments stressed the need to improve water quality in and around the river. Others had concerns about the maintenance of the park's buildings and facilities and suggested that additional landscaping around the park would improve its appearance. Commenters suggested the need for additional lighting and surveillance, especially in more remote areas of the park. Many expressed the need for public restrooms, additional benches, picnic areas, and space for larger gatherings or community events. Finally, many people described the need for additional roadway signage to point visitors in the direction of the park and informational signage inside the park to orient the visitor and provide historical background.

Future Programming

Numerous suggestions were received for activities that many would like to see occur within the park. Many commenters asked for more recreational opportunities within the park including the addition of new hiking and biking trails, access to the river for boating and fishing, and additional sitting and picnicking areas. Commenters had several suggestions for outdoor open space which could be used by the public to hold special events such as festivals, art shows, and classes. Several people suggested the inclusion of a library and/or research facility for public use and more educational tours, brochures, and exhibits.

Partnerships

Several commenters stressed the importance of partnerships for the park including partnerships with local governments and private organizations to incorporate a wider variety of programming. Some examples provided were partnerships with museums to create historical tours, and partnerships with local historical groups to convey the story of labor struggles in the area.



Development of the Preliminary Management Alternatives

Alternatives describe a vision for a park's future conditions and provide a means to explore what the park could become under different management scenarios. They offer different ways of sharing the stories of Paterson, providing educational experiences at the park and within the surrounding NHL district and for managing the natural and cultural features of the park. In addition, GMP alternatives must be reasonable, achievable, consistent with the park's purpose, and conform to NPS laws, regulations, and policies.

To develop the draft alternatives, the GMP planning team reviewed reports and research on the park's historic landscapes, structures and raceway system, and considered elements of other planning studies. Four concepts for the alternatives were presented at the federal advisory commission meeting in January 2013. The federal advisory commission held a special meeting in March 2013 to discuss the alternative concepts and seek public comment. After consulting with the federal advisory commission, the city of Paterson, and other interested agencies, the planning team finalized the

draft management alternatives and presented them at the October 2014 federal advisory commission meeting.

Consultation with Other Agencies, Officials and Organizations

Cooperating Agency

The city of Paterson is formally participating in the GMP process as a cooperating agency. The general agreement (appendix B) established the city's role as a cooperating agency for the GMP/EA in November 2011. Specifically, the city will: appoint a liaison to NPS for the GMP, make non-privileged public records available to NPS, and provide official and consolidated city comments on GMP documents, newsletters and the draft GMP in a timely fashion.

City officials and staff participated in open house meetings, workshops, briefings and many discussions with the GMP planning team. In addition, city staff included NPS in the planning process for the 2014 Paterson Master Plan to ensure that future actions and policies would be consistent with the direction of the GMP. The expertise and assistance of the city staff greatly contributed to the GMP planning process.

Consultation under Section 7 of the Endangered Species Act

Section 7 of the Endangered Species Act of 1973, as amended (16 USC 1531 et seq.) requires all federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) to ensure that any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of listed species or critical habitat.

On March 15, 2012, Paterson Great Falls NHP sent a letter to the U.S. Fish and Wildlife Service (USFWS) informing them of preparation of the GMP and requesting information regarding federally-listed threatened and endangered species in accordance with Section 7 of the Endangered Species Act. NPS received a response from the USFWS with data resources related to the Indiana Bat (*Myotis sodalis*). NPS staff continued to coordinate informally with USFWS throughout the planning process, following which, NPS determined that actions proposed in the GMP “may affect, but are not likely to adversely affect” any federally threatened or endangered species or critical habitats. As part of the Section 7 consultation process, a letter was submitted to the USFWS for review and concurrence with the NPS determination of “may affect, not likely to adversely affect.”

Consultation on State-listed Threatened and Endangered Species

NPS sent a letter on March 15, 2012 to the New Jersey Division of Fish and Wildlife requesting consultation on state-listed species of special concern to the New Jersey DEP. Paterson Great Falls NHP received a response on May 10, 2012 stating that no state-listed endangered, threatened or special concern species was found within the park boundary. NPS staff has also coordinated with this agency during the planning process and will provide a copy of the GMP/EA for their review and comment.

Consultation under Section 106 of the National Historic Preservation Act

Section 106 of the National Historic Preservation Act requires that federal agencies with direct or indirect jurisdiction take into account the effect of undertakings on National Register listed or eligible properties and



allow the Advisory Council on Historic Preservation (ACHP) an opportunity to comment. Toward that end, NPS will work with the NJSHPO and the ACHP to meet requirements of 36 CFR 800 and the November 2008 Programmatic Agreement among the National Conference of State Historic Preservation Officers, the ACHP, and NPS (Department of the Interior). This latter agreement requires NPS to work closely with the SHPO and the ACHP in planning for both new and existing national park areas.

While the GMP will be provided to the NJSHPO and many others, further section 106 consultation, including section 106 assessment of effects to historic properties, will take place once the GMP has been completed and the GMP Finding of No Significant Impacts has been signed, identifying the final alternative chosen. Implementation of the preferred alternative will require section 106 consultation. That consultation, including



Mary Ellen Kramer Park

inviting the ACHP to consult and identifying the appropriate consulting parties, will take place as the GMP is implemented.

Prior to any ground-disturbing action by park managers, a professional archeologist will determine the need for archeological activity or testing evaluation. Any such studies would be carried out in advance of construction activity and would meet the needs of the NJSHPO. Section 110 of the NHPA requires NPS to identify and nominate to the National Register of Historic Places all resources under its jurisdiction that appear to be eligible. Historic areas of the national park system are automatically listed on the National Register of Historic Places upon their establishment by law or executive order.

On March 15 2012, NPS sent a letter to the NJSHPO to initiate consultation for the GMP. In April 2012, NJSHPO staff participated in a workshop with NPS

staff, city representatives and federal advisory commission members to draft the park's foundation for planning. On March 23, 2014, a meeting was held with NJSHPO staff to brief them on the broad GMP concepts and preliminary management alternatives.

Consultation with Native American Tribes

NPS recognizes that indigenous peoples have traditional and contemporary interests and ongoing rights in lands now under NPS management, as well as concerns and contributions to make for the future via the scoping process for general management plans and other projects. Related to tribal sovereignty, the need for government-to-government Native American consultations stems from the historic power of congress to make treaties with American Indian tribes as sovereign nations. Consultations with American Indians and Native Americans are required by various federal laws, executive orders, regulations, and policies, including section 106 of the NHPA.

The Delaware Nation, Delaware Tribe of Indians and the Stockbridge-Munsee Community were invited to consult in March 2012. Letters inviting consultation to these federally- recognized tribes were sent on March 28, 2012. In addition, the Sand Hill Indians were invited to consult and were sent a letter on March 28, 2012. NPS will continue to consult with these traditionally associated tribes and groups during the public review period for this EA and throughout implementation of the GMP pursuant to requirements of 36 CFR 800, federal executive orders and agency management policies.

Future Compliance Requirements

NPS will conduct additional site-specific environmental analysis as individual projects or actions included in the preferred alternative are proposed for implementation. Some of the specific future compliance requirements of the preferred alternative are described in the alternatives and environmental consequences chapters. Included are NPS determinations of how those individual requirements relate to NEPA, the Endangered Species Act (Section 7 requirements), and requirements for compliance with Section 106 of the NHPA regarding historic properties (2008 programmatic agreement and 36 CFR 800).

Public Officials, Agencies and Organizations Receiving this Plan

Copies of the draft GMP/EA were distributed to the following government officials, government agencies, and non-governmental organizations and institutions. Individuals on the GMP mailing list were contacted and copies distributed to people, groups, property owners and businesses who requested the document.

Congressional Delegation

New Jersey Senator Corey Booker

New Jersey Senator Robert Menendez

New Jersey Representative William Pascrell

New Jersey Legislative Delegation—District 35

Senator Nellie Pou

Assemblywoman Shavonda E. Sumter

Assemblyman Benjie E. Wimberly

City of Paterson

Office of the Mayor

City Council

Paterson Historic Preservation Commission

Paterson Free Library (Paterson Museum)

Paterson Public Schools/Board of Education

Passaic County

Board of Chosen Freeholders

Department of Parks and Recreation

Department of Planning and Economic Development

Passaic County Historic and Tourism Board

Regional Commissions

Passaic Valley Sewerage Commission

Passaic Valley Water Commission

New Jersey State Agencies

Department of Community Affairs

Department of Environmental Protection,

Division of Fish and Wildlife

Department of Environmental Protection,

Division of Parks and Forestry

Department of Environmental Protection,

Green Acres Program

Department of Environmental Protection,

Historic Preservation Office

Department of State, Division of Travel and Tourism

Department of Transportation

Governor's Office

Tribal Organizations

Delaware Nation

Delaware Tribe of Indians

Sand Hill Indians

Stockbridge-Munsee Community

Federal Agencies

U.S. Army Corps of Engineers

U.S. Environmental Protection Agency

U.S. Department of Agriculture,

Natural Resources Conservation Service

U.S. Department of the Interior, Fish and Wildlife Service

U.S. Department of the Interior, U.S. Geological Survey

Advisory Council on Historic Preservation,

Office of Federal Agency Programs

Organizations and Institutions

American Labor Museum/Botto House

Friends of Hinchliffe Stadium

Hamilton Grange National Memorial

Hamilton Partnership for Paterson

Montclair State University

National Parks Conservation Association

National Trust for Historic Preservation

New Jersey Community Development Corporation

Passaic County Community College

Passaic County Historical Society

Passaic River Institute

Paterson Education Fund

William Paterson University

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