

**SLEEPING BEAR NATIONAL LAKESHORE
PORT ONEIDA RURAL HISTORIC DISTRICT
ENVIRONMENTAL ASSESSMENT**

**RESPONSE TO PUBLIC COMMENTS
SEPTEMBER 15, 2008**

Comment Received	Comment Response
Opposed to agricultural activities in abandoned farm fields.	Determining the appropriateness and or impacts associated with agricultural activity is not included this project and outside the scope of the Environmental Assessment.
The EA does not show or refer to any of the several farms that were very much part of the Port Oneida story, apparently because the buildings are now mostly gone.	The history of these farms is documented in other park publications, such as "Farming at the Waters Edge." Their treatment is outside the scope of the Environmental Assessment.
We would also encourage the Park to take advantage of the findings and recommendations of our (Preserve Historic Sleeping Bear) Port Oneida Cultural Landscape Interpretive Model.	The project team reviewed the Port Oneida Cultural Landscape Interpretive Model as part of its literature review.
This plan as written does no more than provide recreational opportunities such as parking, trails, restrooms, and wayside exhibits, not the mission as stated, and should be corrected.	The purpose of this project is clearly stated in the document. It is to stabilize historic structures and landscape features while protecting natural features, and meet visitor use and operational needs. The preferred alternative addresses all these project components by addressing the impacts of stabilizing a number of buildings and landscape features, and providing a visitor contact station and park housing in rehabilitated historic buildings.
Did the park consult with the State of Michigan, the Nature Conservancy or the National Audobon Society? Fallow fields in Port Oneida are home to several species of birds that are in decline. The State of Michigan Endangered Species Office would certainly object to plowing or grazing because of the sensitive bird species in the field.	Plowing and grazing are not included in this project and their associated impacts are outside the scope of this EA. The EA identified no impacts to sensitive bird species in any alternative. The park consulted with the Michigan State Historic Preservation Office and U.S. Fish and Wildlife Service as required.
Do the comments go to SLBE or Denver or Wichita or more than one place?	Comments were distributed to the project team, which included representatives from the park, the Midwest Regional Office in Omaha, NE,

	and the Denver Service Center.
The comment period should be extended by two months. Interested parties regarding Port Oneida were not informed about the EA.	The Lakeshore made a diligent effort to publicize the EA and to solicit comments from interested parties. National Environmental Policy Act compliance requires a 30 day public review for Environmental Assessments. We are not aware of any interested parties who have not had the opportunity to become involved.
The criteria and point values used in the choosing by advantage session were ill conceived. The fundamental criteria for judging the best location for these new facilities is “does it support and compliment the work of our partners now and in the near future?”	Fundamental criteria are tied to the purpose of the project - resource condition and visitor experience. Partnership opportunities, while not part of the purpose of the project, were evaluated as additional criteria.
<p>It would have been helpful to select the visitor contact station and employee housing in the context of an overall plan for Port Oneida. We hope that the process for such a plan is scheduled to begin after the conclusion of the planning for the GMP.</p> <p>The proposal should have been expanded as soon as it was discovered that funding for this project had dropped beyond 2014. This EA could potentially lock project proposals without adequately looking at additional features identified by the public during early scoping meetings.</p> <p>Once funding was no longer a near future possibility, the project planning should have been expanded and A/E contract amended to undertake a more thorough discussion on future wants and needs.</p>	A more comprehensive plan is desirable; however, in the interim, it is appropriate to select locations for the currently planned uses of housing and visitor contact station. Although is not known when a more complete plan can be written, the plan may include a range of acceptable uses necessary to attract outside support for preservation of some properties.
The park identified that partnerships would provide an important component in the preservation of historic structures in Port Oneida. This is missing from this EA planning document. It would have made more planning sense to discuss the potential partnerships desired and develop the parking, trails, and NPS facilities that would support this primary use of Port Oneida.	Partnerships are not the “primary use” of Port Oneida. They can, however, be an important component of preserving resources in Port Oneida, as NPS funding for the rehabilitation, operation and maintenance of multiple farmsteads for compatible park purposes is beyond the projected budget for this construction package. The most likely mechanism to accomplish this goal would be through the use of lease or permit agreements. An overall plan would be a part of the solicitation process but would have to be flexible to

	accommodate the range of options representing the best alternative at a particular time.
There is currently a functioning visitor center in Empire. Why is a second one necessary?	This project will rehabilitate a historic property in Port Oneida for use as a visitor contact station. This will not duplicate programs or exhibits currently offered in Empire. It will be a much smaller center that will allow the park to direct visitors and provide programs focused on the historic district.
If one wanted to bring in more money to the Lakeshore by “capturing visitors” (p. 34), then an unmanned pay station at Kelderhouse might accomplish this goal at less expense to taxpayers.	The goal is not to gain revenue, it is to rehabilitate a historic structure for use as a visitor contact station and provide educational opportunities for visitors. It is yet to be determined whether fees will be collected at the visitor contact station.
There is already employee housing at Dechow farm, the Lakeshore should explain to taxpayers why a new employee housing location is needed.	Because the Dechow farm has a high degree of integrity, the park would like to provide more visitor services at the site. Housing will be removed from the farmhouse and located at the new rehabilitated structure. No second location is planned for housing at this time.
The Kelderhouse farm shown in the EA was built not by Thomas, but by his son William.	This correction will be noted on an errata sheet inserted into the final printed document.
The chart on page 18 does not show the M-22 & Basch Road and the Vacation Valley pull-offs.	This correction will be noted on an errata sheet inserted into the final printed document.
Ethnographic resources in the park extend beyond native sites and should be indicated and evaluated so on page 11.	Properties in Port Oneida associated with European-American settlement are not considered ethnographic resources under NPS definitions.
The handicap accessibility access at Charles Olsen is not an adverse effect to either the house or the cultural landscape and additional installation of handicap accessibility features at other sites in Port Oneida will also be a “no adverse effect,” contrary to what is presented in the EA on pages 88, 89, 90.	The addition of universal access through ramps, lifts and/or walks would not cause a determination of adverse effect. Through the impact analysis, however, the project team determined that the overall impact of improvements associated with adaptive re-use, such as gravel parking areas, walkways, and access ramps could result in an adverse effect to the cultural landscape.
The EA mentions the no action alternative; however, all of the alternatives considered provide for a staffed visitor center and new employee housing. Why not consider placing educational signs and literature in kiosks	The construction project is intended to rehabilitate the exterior and at least the portion of an interior space to provide simple interpretive media and visitor information. It may or not be staffed.

<p>around historic structures as they are stabilized and/or rehabilitated?</p>	<p>Compatible signs and kiosks may be part of the interpretive media.</p>
<p>Why is park staff required to be present to provide information at a visitor center in Port Oneida?</p>	<p>It has not been determined whether the visitor contact station will be staffed. It could be staffed full-time, part-time/seasonally or unstaffed. This decision will be determined by availability of interpretive rangers and funding for salary.</p>
<p>What happens to any partnership agreements the Lakeshore has with local nonprofit organizations should the resource that organization is using be chosen as a visitor contact station or housing? For instance, where does PHSB fit into alternative three?</p>	<p>In that instance, the park would share the rehabilitated space with the partner. The detailed arrangement has not been determined at this point. Existing partnerships were considered in the evaluation of locations for housing and visitor contact station. In the selected alternative, visitor opportunities are enhanced through interpretive opportunities at Dechow and Kelderhouse which complement rather than replace the accomplishments at Charles Olsen. No duplication of effort is planned.</p>
<p>A true proposal to experience rural life and cultural heritage would have included a discussion and real alternatives that introduced small-scale agricultural activities onto this cultural landscape</p>	<p>While small scale agricultural activities could potentially be a desired compatible use for visitor education and understanding, that potential is beyond the scope of this planning document. In the future an effort could be made to identify properties best suited for such uses, but these would have to be reviewed on a case by case basis for their impacts and benefits. An overall plan would be a part of the process but would need to be flexible to accommodate options which may be the best alternative at a particular time.</p>
<p>One criteria that should have been considered, when selecting sites for park housing and visitor contact station, should include best use of all structures at a given site.</p> <p>The best suggestions for park housing would be at sites that have a farmhouse and a limited number of small outbuildings.</p>	<p>When developing alternatives, the project team looked at available properties that had at least two buildings that could be used for visitor contact station and restroom facilities. Farms with large numbers of outbuildings tend to have higher integrity and would be impacted to a higher degree than those that had lost outbuildings. Properties that did not have sufficient buildings to support the visitor contact station/restroom development were rejected from evaluation.</p>

<p>I am concerned about the environmental destruction that the Leelanau Scenic Heritage Trailway may cause.</p>	<p>The Heritage Trailway is not part of this project and was not evaluated within the Environmental Assessment.</p>
<p>Page 5, specific treatment approaches – does this mean a return to active agriculture?</p>	<p>The appropriateness of agricultural activities within the historic district is not evaluated within the scope of this project.</p>
<p>Will more detail be provided regarding landscape stabilization? Will any plans beyond what is presented in the EA necessitate a complete and comprehensive EA that will include an evaluation of the environment?</p>	<p>All future historic landscape treatments will be evaluated through the required NEPA process.</p>
<p>The vegetation along the bluff at Carsten Burfiend was historically present as a windbreak. The EA notes clearing of the vegetation along the bluff.</p>	<p>Vegetation would be thinned, not cleared.</p>
<p>Hostelling International has been attempting to get approval to establish a hostel in the Lakeshore. They determined that the Carsten Burfiend was their preferred location. If this farm is selected for use, we in effect thumb our nose at their efforts to be a partner.</p>	<p>The Lakeshore has been in contact with Hostelling International and any plans they might have had for a hostel within the Lakeshore are on indefinite hold. Regardless, an adaptive use that directly serves park visitors or mission would take precedence over use by a potential partner that is not necessary to serve the public. Hostelling International did not provide comment, and another location was selected for both housing and the visitor contact station.</p>
<p>The maps of the Charles Olsen farm do not show the sites of a number of significant buildings that were part of the operation during the period of significance.</p>	<p>The EA focused on the sites as they exist today. If a site was chosen as the Visitor Contact Station, more detailed planning could determine whether and how it would be interpreted.</p>
<p>Are the Thoreson farm and M-22 roadside pull-offs really needed? Is there a particular reason for these?</p>	<p>These pull-Offs would be low impact, and allow visitors to experience striking views of the historic district and Lake Michigan.</p>
<p>Are the parking lots really needed? Visitors to Port Oneida are able to find a place to park without these additional parking lots.</p> <p>The assumptions on which the need for improved circulation is based are not substantiated by hard data.</p>	<p>Parking areas will be designed, located, and sized to accommodate present and anticipated visitation levels with minimal resource impact. Lakeshore staff will direct visitors to Port Oneida to enjoy both educational and recreational opportunities. Park facilities must be adequate to address this need.</p>