

CONSULTATION AND COORDINATION WITH OTHERS



PUBLIC INVOLVEMENT

This *Draft General Management Plan / Environmental Impact Statement* for Pipestone National Monument reflects thoughts presented by the National Park Service, American Indian groups, and the public. Consultation and coordination among the agencies and the public were vitally important throughout the planning process. The general public had two primary avenues to participate during the development of the plan: participation in public meetings and responses to newsletters.

AMERICAN INDIAN INVOLVEMENT

The section on the scoping process (p. 4) contains detailed information about the specific dates of notices and meetings and when government-to-government American Indian consultations were conducted. Consultations with American Indians began with letters sent initially to 27 tribes and follow-up telephone contact with tribal governments. Thirteen more tribes were contacted as their interest in Pipestone National Monument was identified. Because there were 40 identified Indian tribes with an interest in Pipestone National Monument, each tribe was asked about its interest in being involved in the planning process and how its members wanted to be consulted. All tribes indicated they wanted to be kept on the mailing list for newsletters and the draft plan. Several tribes identified specific individuals to represent them.

Meetings were conducted with individuals and with tribal entities on the basis of the level of interest that each showed in the plan alternatives as described in the newsletters. Written comments about the newsletters also were solicited.

PUBLIC MEETINGS AND NEWSLETTERS

Public meetings and newsletters were used to inform the general public and governmental

entities and to keep them involved in the planning process for Pipestone National Monument. A mailing list was compiled that consisted of members of government agencies, nongovernmental groups, businesses, legislators, local governments, and interested citizens.

The notice of intent to prepare an environmental impact statement was published in the *Federal Register* on September 25, 2000. A news release on September 29, 2000, announced the beginning of the planning process and invited the public to open houses at the visitor center on October 11 and 12. These meetings helped the planning team determine issues and concerns that should be addressed in the plan.

A short newsletter explaining the planning process was issued in February 2002. A news release was published in April 2002 to update the public about the progress of the planning effort. A third newsletter published in June 2002 outlined the alternative concepts and sought public comment.

The draft Pipestone National Monument General Management Plan was made available to the public on February 28, 2007. The Notice of Availability for the draft plan was published on March 16, 2007. Public review officially closed on May 15, 2007. The general management plan was mailed to everyone on the park mailing list, which includes a total of 273 individuals, agencies, and organizations.

During the review period four open houses were held in four locations in Minnesota and South Dakota. The public meetings were held in locations close to the reservations of culturally affiliated tribes and in population centers near Pipestone National Monument. These meetings helped the planning team to answer questions of the public and understand any concerns raised by the plan. The first open house was held the afternoon

and evening of February 20 at the Performing Arts Center in Pipestone with 32 in attendance. The second was held the afternoon and evening of February 21 in Pierre, South Dakota at the South Dakota State Historical Society. One person attended. The third open house was held at the Chamber of Commerce in Yankton, South Dakota on February 22. A total of 7 people attended during the two sessions that were held from 2:00 to 5:00 and from 6:00 to 8:30. The third open house was held the afternoon of February 23 in Marshall, Minnesota at Southwest Minnesota State University. No one attended. The open houses were announced in local newspapers, via news releases to the park mailing list. Notice was provided to local television and radio stations.

In addition, the National Monument Superintendent met with a group of 15 Lakota and Dakota elders on March 15, with the Pipestone County Commissioners on April 3, and with 22 Lower Brule elders on May 6.

Twenty-five (25) letters were received in response to the public review. Four (4) official responses were received from Indian tribes. Responses were received from city and county government officials and state and federal agencies.

CONSULTATION

Agencies that have direct or indirect jurisdiction over historic properties are required by section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470, et. seq.) to take into account the effect of any undertaking on properties in or determined eligible for inclusion in the National Register of Historic Places. To meet the requirements of the regulations of the Advisory Council on Historic Preservation on implementing section 106 (36 CFR 800, "Protection of Historic Properties"), the National Park Service sent letters to the Minnesota state historic preservation officer (SHPO) and the Advisory Council on Historic Preservation in

October 2000, inviting their participation in the planning process. All the newsletters were sent to both offices with a request for comments.

Under the terms of stipulation VI.E of the 1995 programmatic agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, the National Park Service will work with the Minnesota state historic preservation officer to determine which actions qualify as programmatic exclusions under IV.A and B and which other undertakings will require further review and comment under 36 CFR 800.4-6.

The following table identifies the actions that were considered and the determination that was reached about whether further SHPO consultation would or would not be required for each.

TABLE 11: FUTURE NATIONAL HISTORIC PRESERVATION ACT COMPLIANCE REQUIRED FOR IMPLEMENTATION OF SPECIFIC ACTIONS (PREFERRED ALTERNATIVE)

Action	Compliance Requirement
Maintenance moved out of national monument; cooperative maintenance agreement with other public or private entity to house operations; if not possible, then contract for or lease space.	No further SHPO consultation needed.
Visitor center and two Mission 66 houses removed.	Needs further consultation with the SHPO and development of an MOA.
Remnant prairie managed to preserve its significance; restored prairie managed to recover native plant species	No further SHPO consultation needed.
American Indian ceremonial use unchanged; Three Maidens grounds restored to prairie; Hiawatha Club use of Three Maidens ceased.	Needs further SHPO consultation.
Picnic area and restrooms removed.	No further SHPO consultation needed.
NPS assists with preservation of Indian School superintendent's house.	No further SHPO consultation required, but NPS will consult with SHPO as part of memorandum of agreement on demolition of the National Register eligible visitor center and associated cultural landscape.
School district lands south of Minnesota West Community and Technical College on eastern boundary acquired; prairie restored.	No further SHPO consultation needed.
Cooperative agreement among NPS, USFWS, and MDNR to coordinate mutually beneficial land management activities.	Needs further SHPO consultation if ethnographic resources as traditional properties or cultural landscapes found eligible for national register.
Existing trails upgraded with rerouting; new trails possible to connect the Circle Trail to the new entrance.	Needs further SHPO consultation.
Continued NPS efforts to control exotic species in national monument; NPS would work with owners of adjacent property to identify and eradicate exotics.	No further SHPO consultation needed.
Sun Dances still permitted; modifications of use might be made on the basis of impact and sustainability of resources.	No further SHPO consultation needed.
Superintendent's Indian Advisory Committee established.	No further SHPO consultation needed.

**TRIBES, AGENCIES, AND
ORGANIZATIONS TO WHICH
THIS DOCUMENT WAS SENT**

Director's Order 12 requires a listing of all agencies, organizations, and people who receive copies of the plan. A list of individual recipients may be kept in the project file rather than being listed in the back of the plan if that list is more than three pages. A complete list is available from the National Park Service, Denver Service Center, 12795 West Alameda Parkway, P.O. Box 25287, Denver, CO 80225-0287

Federal Agencies and Officials

Advisory Council on Historic Preservation
U.S. Department of Agriculture
 Natural Resource Conservation Service
U.S. Department of the Interior
 U.S. Fish and Wildlife Service
 National Park Service
 Badlands National Park
 Effigy Mounds National Monument
 Grand Portage National Monument
 Keweenaw National Historical Park
 Mississippi National Scenic
 Riverway
 Saint Croix National Scenic
 Riverway
 Voyageurs National Park
U.S. Environmental Protection Agency
Honorable Norm Coleman, Senator
Honorable Mark Dayton, Senator
John Kline, Representative to Congress

Affiliated American Indian Tribes

Cheyenne River Sioux Tribe
Crow Creek Sioux Tribe
Flandreau Santee Sioux Tribe
Fort Peck Assiniboiné and Sioux Tribes
Iowa Tribe of Kansas and Nebraska
Iowa Tribe of Oklahoma
Lower Brule Sioux Tribe
Lower Sioux Indian Tribe
Oglala Sioux Tribe
Omaha Tribe of Nebraska
Otoe-Missouria Tribe
Ponca Tribe of Nebraska

Ponca Tribe of Oklahoma
Prairie Island Indian Tribe
Rosebud Sioux Tribe
Santee Sioux Nation
Shakopee Mdewakanton Nation
Sisseton-Wahpeton Oyate Tribe
Spirit Lake Tribe
Standing Rock Sioux Tribe
Three Affiliated Tribes
Upper Sioux Community of Minnesota
Yankton Sioux Tribe

**Other American Indian Tribes and
Organizations**

Caddo Indian Tribe of Oklahoma,
 Chairperson
Devil's Lake Sioux Tribe
Eastern Band of Cherokee, Principal Chief
Fond du Lac Band of Minnesota Chippewa
Keepers of the Sacred Tradition of
 Pipemakers
Little Feather Indian Center
Nez Perce Tribe, Chairperson
Northern Cheyenne Tribe, President
Osage Nation, President
Pipestone Indian Shrine Association
Red Cliff Band of Lake Superior Chippewa
Sac & Fox Nation of Missouri, Chairperson
Sac & Fox Nation of Oklahoma, Principal
 Chief
Sac & Fox Tribe of the Mississippi in Iowa,
 Chairperson
Shoshoni Tribe, Chairperson
United Sioux Tribes

State Agencies and Officials and Parks

Minnesota Department of Health
Minnesota Department of Natural Resources
Minnesota Department of Tourism
Minnesota Department of Transportation,
 Passage Coordinator
Minnesota Pollution Control Agency
Minnesota State Historic Preservation Officer,
 Dr. Nina Archabal
Minnesota West Community and Technical
 College
State of Minnesota Indian Affairs Council
Governor Tim Pawlenty
Senator Jim Vickerman

Hon. Doug Magnus, Minnesota House of
Representatives
Bigstone Wildlife Refuge
Blue Mounds State Park
Camden State Park
Jeffers Petroglyphs State Historic Park
Lake Shetek State Park
Split Rock Creek State Park

Local Agencies and Officials

Pipestone County Attorney
Pipestone County Auditor
Pipestone County Extension
Pipestone County Fair
Pipestone County Museum
Pipestone County Treasurer
Pipestone County Recorder of Deeds
Pipestone County School District
Pipestone County Soil and Water
Conservation District
Pipestone County Sheriff
Mayor of Pipestone
Pipestone Building and Zoning Administrator
Pipestone City Administrator
Pipestone Community Library
Pipestone Convention and Visitors Board
Pipestone Parks and Recreation Director
Pipestone Heritage Preservation Commission

Organizations and Businesses

Ambulance Association
American Indian Movement, Minneapolis
American Indian Studies Program
Association on American Indian Affairs
Boy Scouts of America
Calumet Chapter 51
Cattlemen's Association
Center for Rural and Regional Studies
Chapter C, PEO
Cub Scouts, Boy Scouts of America
Farm Bureau
Fire Department, Pipestone
Flying Arrow Ranch
Fort Pipestone
Girl Scouts U.S.A.
Hiawatha Club
Hiawatha Snowblazers
Historic Pipestone
Historical Society

Indian Shrine Association
Jaycees
Keepers of the Sacred Tradition of
Pipemakers
Kiwanis Club
Little Feather Indian Center
Master Gardeners/Home Study
MCCL
Medical Auxiliary
The Nature Conservancy
Pheasants Forever
Pipestone Chamber of Commerce
Pipestone Golden Kiwanis
Pipestone Lions Club
Pipestone RV Campground
Pipestone Publishing Company
Pork Producers
Pottawatomie Cultural Center and Museum
Red Cross
Reliant Energy-Minnegasco
Sagio Club
Senior Citizen Center
Sioux Valley Southwest Electric
SWST Cultural Affairs Committee
Travelers Council
Truine Chapter #51
Veterans of Foreign Wars Auxiliary
Veterans of Foreign Wars Post 3814
Williams Pipeline Company
XCEL Energy-Northern States Power

Media

Argus Leader
Brookings Register
Buffalo Ridge Gazette
Dell Rapids Tribune
Edgerton Enterprise
Flandreau Santee Sioux Executive
Indian Country Today
KARL-KKCK-KMHL Radio
KDLT-TV
KELO-TV
KLOH
KRSW-FM
KSFY-TV
KTTW-FOX-TV
Lakota Times
Marshall Independent
Minneapolis Star-Tribune

CONSULTATION AND COORDINATION WITH OTHERS

Moody County *Herald*
Murray County *Herald*
South Dakota Public Broadcasting
Tollefson Publishing

Tyler *Tribune*
Worthington *Daily Globe*

Consultation and Coordination Record

7/15/00	Lower Brule Sioux Tribal Council, elders, and Cultural Resource Committee members visit Pipestone National Monument.
8/25/00	Pipestone National Monument superintendent met with Ms. Kathy Bolin, Passage Coordinator at Minnesota Department of Transportation, to discuss "International Prairie Passage Route."
9/25/00	<i>Federal Register</i> notice published.
9/25/00	Press release announcing beginning of general management plan (GMP) process.
9/29/00	Press release announcing public meetings on the GMP.
10/2000 and 2001	Letters and GMP data mailed to 40 tribes inviting participation. Pipestone NM staff made followup calls to confirm interest in receiving documents or briefings as plans became available. (Original letters to 27 tribes in October 2000; letters to 13 more tribes in 2001).
10/02/00	Letter to Advisory Council on Historic Preservation inviting participation in planning process.
10/02/00	Letter to Minnesota state historic preservation officer (SHPO) inviting participation in planning process.
10/02/00	Letter to Field Supervisor, U.S. Fish and Wildlife Service, Ecological Services Field Office, notifying of GMP and requesting list of federally listed species.
10/02/00	Letter to all people on NM mailing list inviting them to open houses.
10/02/00	Letter to Joseph Schelhass, president of Hiawatha Club, notifying him of GMP and inviting participation in open houses.
10/03/00	Letter to State Representative Richard Mulder to attend open houses.
10/11/00	Open House at Pipestone National Monument, 4–6 p.m.
10/12/00	Open House at Pipestone National Monument, 7–9 p.m.
10/27/00	Superintendent called Myron Williams, Sisseton-Wahpeton Tribe, and asked him to put out word on GMP. All welcome to provide input.
10/30/00	Lower Brule Sioux Tribal Council elders and Cultural Resource Committee members return to Pipestone NM to meet with national monument staff and GMP team captain to discuss their impressions of the national monument and the GMP and to advise the NM about issues of sacredness.
11/08/00	Letter from U.S. Fish and Wildlife saying that two T&E species possible in the NM (Topeka shiner, endangered, and western prairie fringed orchid, threatened).
11/17/00	Letter from Minnesota SHPO requesting involvement in planning process.
12/01/00	Letter to Minnesota Department of Natural Resources, Natural Heritage and Nongame Research Program, Section of Ecological Services, requesting information about state-listed species in Pipestone County.
12/12/00	List of species and native plant communities in the county provided by Minnesota Department of Natural Resources, Natural Heritage and Nongame Research Program, Section of Ecological Services. List of species and native plant communities in the county provided by Minnesota Department of Natural Resources, Natural Heritage and Nongame Research Program, Section of Ecological Services.
12/28/00	Letter from Pipestone Indian Shrine Association giving ideas, comments, and suggestions for GMP.
1/10/01	Letter from Larry Van Horn, DSC planning team, responding to a request from Scott Jones of the Lower Brule Tribe regarding American Indian Religious Freedom Act.
1/11/01	Letter from Advisory Council on Historic Preservation acknowledging the GMP and outlining the group's participation.
1/12/01	Telephone call to Minnesota SHPO arranging meeting to discuss SHPO involvement.
1/22/01	Tribal Chair Dallas Ross, Upper Sioux Community of Minnesota, came to Pipestone to discuss issues and review GMP process with superintendent.
02/02/01	Pipestone NM published short newsletter explaining GMP, telling schedule, and explaining how people can get involved. Newsletter sent to national monument's mailing list.
02/12/01	Jolene Arrow, Yankton Sioux Tribe, called about GMP because Jerry Flute, Association on American Indian Affairs, had alerted her. Fax and copies of original GMP mailing sent to her.
2/13–16/2001	GMP meetings at Performing Arts Center. DSC and NM team, as well as Bill Supernaugh, superintendent of Badlands NP.

2/20/01	Pipestone NM superintendent conferred with Paul Dobbs, Minnesota West Community and Technical College, about Pipestone Indian school Superintendent's house, discussed ownership issues and how it was transferred.
2/20/01	Superintendent conferred with Bud Johnston, Keepers of the Sacred Tradition of Pipemakers, discussed ownership of superintendent's house and how it was transferred.
2/26/01	Telephone call between Larry Van Horn, DSC planning team, and Dennis Gimmstad, Minnesota state historic preservation office, to discuss SHPO involvement in planning process.
3/03/01	Superintendent met with Flandreau Santee Sioux, Santee Sioux, and Chuck Derby, Little Feather Interpretive Center, to discuss national monument management and GMP issues.
3/20/01	Letter from Pipestone NM superintendent to Dennis Gimmstad, Minnesota state historic preservation office, outlining GMP progress and following up on conversations of 1/12/01 and 2/26/01.
4/02/01	Jolene Arrow, Yankton Sioux Tribe, asked Pipestone NM superintendent to present GMP and national monument management issues to a group meeting at Fort Randall, SD.
4/23/01	Letter from Dennis Gimmstad, Minnesota state historic preservation office to Pipestone NM superintendent regarding SHPO involvement in the GMP.
4/25/01	Meeting about pipestone quarries at Pipestone NM hosted by the Yankton Sioux at the Fort Randall Casino/Hotel. Members of many other Sioux Tribes included. Topics discussed were GMP, Government Performance and Results Act (GPRA), and national monument management. Pipestone NM superintendent and team captain spoke about the GMP, answered questions about NM management and operation. Regional anthropologist and NM chief ranger also attended.
4/27/01	Telephone call between Minnesota state historic preservation office and Pipestone NM superintendent to discuss GMP.
5/2/01	Yankton Tribal Chair designated Jolene Arrow as contact.
5/23/01	Myron Williams, Sisseton-Wahpeton Tribe, discussed with superintendent forming a consultative group.
6/28/01	Minnesota SHPO visited Pipestone NM for a day. Team captain and planning team also visited. GMP discussed.
7/3/01	Jolene Arrow, Yankton Sioux Tribe, called to discuss previous meeting.
7/13/01	Superintendent briefed Mick Myers, executive director, Pipestone Chamber of Commerce, on GMP.
7/16/01	Superintendent briefed County Commissioner Jack Keers on GMP.
7/19/01	Superintendent briefed Pipestone Mayor Bill Ellis on GMP.
7/24/01	Superintendent briefed Vern Long on GMP.
8/02/01	Superintendent briefed Chuck Derby, Little Feather Interpretive Center, on GMP and other issues.
1/30/02	Telephone conversation with Jim Jones, MN Indian Affairs Council, to discuss GMP. Follow-up letter and background materials on GMP sent 2/05/02.
2/2002	Two articles and an editorial in the <i>Argus Leader</i> newspaper about GMP following input from Pipestone NM superintendent and staff.
2/14/02	Meeting with Lower Brule Sioux Tribal Council and Elder Council at Pipestone NM.
2/22/02	Radio interview of superintendent with KDCR, Sioux Center, Iowa, about GMP.
2/22/02	Letter from Red Cliff Band of Lake Superior Chippewas Tribal Council to NM superintendent, designating Keepers of the Sacred Tradition of Pipemakers to represent the band on the GMP.
3/04/02	Letter from Pipestone NM superintendent to Chairman, Red Cliff Band of Lake Superior Chippewas confirming their 2/22/02 letter and assuring that they would remain on the mailing list.
4/01/02	Letter to Tribal Chairman, Sisseton-Wahpeton Sioux Tribe, acknowledging request that Chuck Derby function as the tribe's liaison to the GMP.
4/03/02	Letter from Pipestone NM superintendent to Chairman, Fond du Lac Band of Minnesota Chippewa Indians, to discuss GMP.
4/03/02	News release telling status of GMP.
5/29/02	Conversation between Pipestone NM superintendent and a staff writer, Minneapolis <i>Star Tribune</i> about GMP.
5/29/02	Letter to Tribal Chairman, Sisseton-Wahpeton Sioux Tribe, acknowledging request that Joe Williams, Cultural Committee of the Sisseton-Wahpeton Tribe, and Chuck Derby, Little Feather Interpretive Center, function as tribe's liaison to GMP team.
5/30/02	Meeting with Minnesota West Community and Technical College CEO Paul Dobbs about GMP.
6/02/02	Pipestone NM published newsletter describing progress to date and outlining alternative concepts to be expanded on in GMP.
7/16/02	Pipestone NM superintendent spoke at a meeting of Hiawatha Club about GMP, NPS policy and laws dealing with sacred sites, and possible impacts on the Hiawatha Pageant.

CONSULTATION AND COORDINATION WITH OTHERS

8/05/02	Letter from Tribal Council of the Sisseton-Wahpeton Tribe, Lake Traverse Reservation, to Pipestone NM superintendent transmitting three tribal council resolutions individually designating the Three Maidens, Leaping Rock, and the Oracle as sacred sites.
10/19/02	Meeting with Lower Brule Sioux at Pipestone NM.
3/19/03	Superintendent briefed City Administrator on possible partnerships and space needs.
4/24/03	Superintendent briefed Paul Dobbs, CEO, Minnesota West Community and Technical College.
4/29/03	Superintendent briefed Chuck Derby, Sisseton-Wahpeton Liaison, on GMP.
5/01/03	Superintendent briefed Cally Eckles, staff person for Congressman Gutknecht, about national monument and GMP.
5/6–7/03	Superintendent attended meeting hosted by the Lower Brule Sioux at Lower Brule, SD and gave GMP briefing and status of GMP. Other tribes represented were Yankton, Rosebud, Three Affiliated Tribes, Standing Rock, and Pine Ridge.
5/21/03	Superintendent briefed Joe Williams, Sisseton-Wahpeton Liaison, on GMP.
11/26/04	Elders and some council members of the Lower Brule Sioux visited national monument. They were given an update on draft GMP status and provided handouts on establishing act, proposed mission, purpose, significance statements, and interpretive themes.
3/25/05	Superintendent briefed Sisseton-Wahpeton tribal GMP liaison Chuck Derby on status of plan.
3/31/05	Superintendent had telephone discussion with Sisseton-Wahpeton tribal liaison Joe Williams on draft GMP and sent pipestone geology study.
7/1/05	Letters were sent to each of the 23 affiliated tribes transmitting recently completed studies: <i>Native American Cultural Affiliations and Traditional Association Study</i> , and <i>The Ever-Changing Pipestone Quarries</i> . Status of draft GMP was stated, and an invitation was extended requesting liaison representative designations.
10/12/05	Sisseton-Wahpeton Tribal Historic Preservation Officer, Mr. Frankie Johnson, and several other tribal members visited the national monument. Superintendent extended an invitation to discuss the draft GMP at a later time. Upon their request, a national monument <i>Strategic Plan</i> was sent.
10/12/05	Letters were sent to each of the 23 affiliated tribes requesting a preferred method for conducting government-to-government relations for the draft GMP and the designation of a preferred tribal contact person. One response dated December 6 was received from the Standing Rock Sioux Tribe.
12/6/05 – 12/9/05	Telephone contacts were made with 22 of the affiliated tribes for designated contacts. Contact persons were recorded for future reference in disseminating plans.

SUBSTANTIVE COMMENTS AND NPS RESPONSES

Following are reprinted letters containing substantive comments and NPS responses to those comments.

COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 15 2007

REPLY TO THE ATTENTION OF:

B - 19J

Superintendent Jim LaRock
Pipestone National Monument
36 Reservation Avenue
Pipestone, Minnesota 56164-1269

Re: Comments on the Draft Environmental Impact Statement for the Pipestone National Monument General Management Plan, Pipestone County, Minnesota, CEQ No. 20070091

Dear Mr. LaRock:

In accordance with United States Environmental Protection Agency (US EPA) responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS) for the Pipestone National Monument (PNM) General Management Plan.

The National Park Service is developing a General Management Plan to guide future decisions regarding this unique Minnesota resource. Catlinite is the stone quarried by American Indians from prehistoric times at this site, apparently one of only a few in the country, for the making of ceremonial pipes. This, along with several related landforms, have made the park area a sacred site for multiple tribes who still come to practice various traditions and rights. In 1937, a comparatively small National Monument was created to protect this cultural resource. A now historic, but functionally inadequate structure, was built as a visitor's center in the middle of the landform. A nearby Pipestone Indian School building is a registered National Historic Landmark, and has directly related significance to the PNM, but is presently not part of PNM. Global, national and state threatened and endangered species are located within PNM, contributing to its unique prairie landscapes and the historic Nicollet Expedition biology site. Neighboring developments and land uses threaten the PNM's sacred integrity, functions, and environmental resources. Past decisions, limited resources and philosophically divergent planning goals at national, state and local levels continue to threaten the maintenance and functionality of the monument's most significant resources.

US EPA has not participated in any earlier scoping initiatives for this project, which began in 2000. Local and Indian Tribe stakeholders have been actively pursued to obtain their participation in the scoping process. A list of Park Service and stakeholder concerns was developed and potential actions for addressing them were formulated. These were developed into two alternative plans for long range management of the park. A stakeholders meeting was

RESPONSES

Responses to United States Environmental Protection Agency

1. In the Memorandum of Agreement (MOA) with the Minnesota State Historic Preservation Officer (SHPO) detailing mitigation measures the National Park Service will undertake in removing the Pipestone Visitor Center, the National Park Service will provide technical assistance and will commit to search for preservation funding for the stabilization and restoration of the Superintendent's house. This may include-at some point in the future, should other options prove unsuccessful-the National Park Service assuming ownership of the house through a minor boundary adjustment, legislation, donation, or any other practical vehicle. One of the options the National Park Service will pursue is stabilization and preservation funding through the Centennial Challenge Program, with the premise that matching funds would come from the State of Minnesota and local sources, and in-kind assistance would come from the college. Future uses of the Superintendent's house could be as an interpretive center telling the story of the Indian Schools using the Pipestone Indian School as an example, or to house office space for tribal uses. The owners of the Superintendent's house, Minnesota West Community and Technical College, will be invited to be signatory to the MOA, and the MOA will be included as an appendix in the final General Management Plan.

RESPONSES

COMMENTS

then held to negotiate a third compromise plan. Alternatives presented in this DEIS include a no-action "baseline," two diverse proposals, and a fourth "blended" alternative.

Our review of the Pipestone National Monument Draft General Management Plan proposal as presented in this DEIS raises several concerns. The following is a brief discussion of those concerns.

1) The Indian School Superintendent's House and its immediate one-acre lot is presently owned by an Indian representative group, Keepers of the Fire. Although they have genuine concern for this site, they have no authority or mechanisms for raising financial support sufficient to maintain this registered National Historic Structure. The surrounding property (school house land) used to be part of this school grounds, and is elevated, affording vistas of the PNM. It is presently owned by the Minnesota West Community and Technical College. This college has developed a modest active campus just north of this site. College or other development of the school house land, surrounding the Indian School House, is a real possibility. Such development would adversely impact the PNM and preclude future incorporation into the functions of the PNM, yet purchase of this property was not discussed in the DEIS. Only a 15.3 acre parcel further south of this parcel is considered. We suggest a supplemental DEIS or the final EIS consider an alternative that would include obtaining this school house land as well as the 15.3 acre parcel, both to provide buffering protection for the PNM's globally significant environment nearby and for optimizing PNM functions as suggested below in item 2.

2) A significant difference between the alternatives considered involves demolition or retaining in place the Reservation Avenue Entrance Drive, parking lot(s) and the existing "historic" visitor's center. This latter facility is described in the DEIS as multiply modified within the past fifty years, functionally inadequate to the point of needing considerable upgrading /modification as proposed, and requiring construction of a berm within the floodplain for protection from annual and flash flooding. Two additional houses described as historically significant are located near the entrance of the PNM, just off Reservation Avenue. These are located within a significant wetlands area of the PNM where the fringed prairie orchid, an endangered species, is currently reestablishing a presence.

The DEIS presents (beginning on page 24) "...the conditions prescribed by laws, regulations, and policies most pertinent to the planning and management of the national monument..." These citations highlight avoiding further harm, promoting protection of and whenever possible restoration of previously impacted/degraded prairie, wetland, floodplain and significant species within the PNM. Did the Park Service consider the option of moving and restoring the visitor center and entrance houses at another location, rather than demolishing them? This, similar to alternative 1, would allow restoring an uninterrupted prairie at the center of the PNM and at the present entrance area. One possible relocation site for moving these structures is to a setting on the school house land mentioned in 1) above. This could improve prairie vistas and perhaps orientation for visitors, consolidate a visitor's introduction to the historic and cultural resources of the PNM, improve user fee operations, and provide a reasonable site to relocate/consolidate maintenance functions as well.

Alternatives 2 and 3 discuss anticipated impacts from remodeling the visitor's center and entrance houses in place. The DEIS presentation of alternatives 2 and 3 does not include meaningful consideration of the continued, cumulative and intentional maintenance of invasive

COMMENTS

RESPONSES

species with fertilizers, weed controls and such around the buildings and parking lots. The fact that the entrance road and abandoned railway are known significant routes of invasive species impacting the prairies is not addressed. The DEIS indicates that alternative 1 would remove a variety of visitor and support functions off-site, but does not discuss possible locations nor the impacts associated with moving these functions off-site. Please include such information in the final EIS.

Wherever these functions are ultimately located, the final EIS should consider modifying the structures to incorporate "green architecture." The Park Service could commit to retaining the historical nature of these buildings while using energy efficient and ecological design features, such as efficient heating, cooling, insulation, lighting, vegetated swales, and permeable pavements, by incorporating their use in this ideal setting.

3) Maintenance is currently conducted from several buildings, including the visitor's center, an entrance road house, and a structure adjacent to Pipestone Creek off Hiawatha Avenue and overlooking the Sioux Quartzite Escarpment. All three of these sites threaten important PNM ecological holdings, are responsible for some degree of run-off and spill impacts and complicate best management practices. Alternative 1 proposes moving the present structure on the escarpment "off-site" and replacing it with a parking-trailhead area with restrooms. While some impacts of this revised use are briefly presented, the questions of how the restrooms will avoid contributing to the creek impairment, how parking lot spills and run-off will be mitigated, and what impacts the relocated maintenance structure will have are not adequately addressed.

4) The DEIS mentions a growing concern for developments of neighboring properties surrounding the PNM. While the possibility of selectively expanding PNM to obtain a "buffer" zone is presented with respect to a portion of bordering lands to the north and a small northeast area, impacts to the west, south and east sides are only acknowledged. Given the importance and uniqueness of the PNM to the local economy, the state and national preservation inventory, and its sacredness to multiple tribal groups, we recommend a supplemental DEIS or the final EIS present specific ways of addressing neighboring developments with city and state planning groups. The possibility of PNM expansion to create buffer zones, easement purchases or agreements, or participation in local planning programs to better represent the PNM concerns are some opportunities that should be more completely presented. Although protecting vistas is a problematic effort, zoning which designates preservation of prime farmland with limitations to tower and bulk structures may be possibilities for at least the western and northern views into and across this prairie setting.

5) Mr. Thomas Bransch of our Water Division is investigating the status of the impaired Pipestone Creek, its restoration process, and development of a Total Maximum Daily Load (TMDL). These considerations might be expedited in light of this creek's impacts upon the PNM.

6) The DEIS makes several references to bringing trails up to park service standards. A supplemental draft or final EIS should discuss what those standards are and what impacts such enhancement could have. We recommend that they could include the use of permeable surfaces

RESPONSES

COMMENTS

to minimize run-off, bioswale adaptations to the adjacent lands, and reasonable adoption of handicap accessibility considerations.

7) Appendix E (page 255) mentions the abandoned Soo Line Railway right-of-way that traverses the PNM south to north along the east edge of the Sioux Escarpment. Because this is another major pathway for invasive species and directly challenges the historic and environmentally significant Nicollet biological site, a supplemental DEIS or final EIS should address its impacts and possible mitigation.

8) The PNM is a sacred site for tribal cultures who find great significance in and seek the solace of silence. Park user experience is typically a concern of the NPS. Since one aspect of prairie is its soft sounds, the supplemental DEIS or final EIS should address noise as an issue. The sounds from traffic, the use of loud pumps to drain quarry pits, ongoing maintenance methods, and now the possibility of nearby wind energy turbines are among the conditions that should be discussed in this plan.

We commend the Park Service for your extensive efforts to reach out to tribal stakeholders. We also commend your efforts to negotiate with adjacent land managers to address invasive species encroaching along the northern edge of the PNM. Community outreach is clearly a significant factor in the survival of the PNM setting; we encourage your continued efforts there.

Our review of this DEIS has identified concerns in several critical areas. Based upon these human and natural environmental concerns and the information we request to be provided in a supplemental DEIS or the final EIS, we have assigned a rating of "EC-2" (environmental concerns, insufficient information). Please refer to the enclosed Summary of Rating Definitions Sheet. This rating will be published in the Federal Register.

We appreciate the opportunity to review and comment on this DEIS for the Pipestone Draft General Management Plan. We would welcome questions or greater participation in considering alternatives suggested in our comments. Please feel free to contact me or Norm West of my staff at 312-353-5692 or west.norman@epa.gov. Specific questions concerning the water issues should be addressed to Tom Bramscher at 312-886-6753, or bramscher.thomas@epa.gov.

Sincerely,



Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Science, Ecosystems and Communities

COMMENTS

RESPONSES

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS state, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

COMMENTS

RESPONSES

COPY



MINNESOTA HISTORICAL SOCIETY

State Historic Preservation Office

May 15, 2007

Mr. M. James LaRock
U.S. Dept. of the Interior
National Park Service
Pipestone National Monument
36 Reservation Avenue
Pipestone, MN 56164-1269

Re: Pipestone National Monument Draft General Management Plan/EIS
Pipestone County
SHPO Number: 2007-1201

Dear Mr. LaRock:

Thank you for the opportunity to review and comment on the above report. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and the Procedures of the Advisory Council on Historic Preservation (36CFR800).

The discussion on pages 104 through 199 of the report provides a general background on the cultural resources of the monument – a crucial foundation of a management plan for a place like Pipestone. Of the five types of cultural resources found at the monument, four – archaeological sites, cultural landscapes, ethnographic resources, and historic structures – may meet National Register criteria as contributing elements. The discussion acknowledges that some of these resource types have been more thoroughly evaluated than others. For example, a number of archaeological investigations have been completed over a 120-year period, and a recent archaeological overview report has been completed. Structures and buildings that have been evaluated include the Mission 86 developments of the monument and the Pipestone Indian School Superintendent's Residence. While some individual ethnographic resources in the monument have been identified, they have not been fully evaluated under National Register criteria. Ethnographic and historic cultural landscapes have not been systematically surveyed, and need more study as contributing elements of the monument. The section provides a number of recommendations to address these identification/evaluation needs. This issue is of great importance.

Due to the unequal nature of resource information on the full range of contributing elements within the monument, we have some concerns about the Section 106 assessments of effect for the various types of resources under each alternative. It does not seem that the current level of information is sufficiently detailed to enable sound Section 106 determinations of effect. For example, the discussion of the effects of alternative 3 on cultural landscapes on page 203 acknowledges that potential effects on the cultural landscape that cannot be avoided could be adverse, but the next paragraph

Responses to the State Historic Preservation Office

1. We appreciate the comments of the State Historic Preservation Office (SHPO) on the adequacy of information in the Environmental Impact Statement. We recognize that not all resources have been completely inventoried, and the significance of all cultural resources and their roles as contributing elements within the Monument are not entirely known. However, we note that the purpose of the Draft Environmental Impact Statement is not a formal determination of effect. The intent of circulating the Draft Environmental Impact Statement for comment is to gain information on the sufficiency of the data gathered, and the reasonableness of the evaluation of impacts.

COMMENTS

2.
cont.

concludes that alternative 3 will have no adverse effect on eight potential cultural landscapes (which have been identified but have not yet been fully described). Considering these kinds of issues, we do not feel that we can concur in the determinations of effect at this time. It is also difficult for us to assess the analysis of future compliance requirements in Table 11 on page 224, without knowing what National Register eligible contributing elements of the monument might be affected by the listed actions.

3.

Finally, we have some specific concerns related to the Indian School Superintendent's Residence. The report establishes the importance of this National Register listed property to the history of the monument. We recognize that there can be a range of productive treatment options for historic buildings that may not be in federal ownership, but that may be important for preservation and interpretive purposes. However, we do not believe that the level of effort reflected in alternatives 1 and 3 (as explained in appendix F on page 258) for this building is sufficient to produce effective results. Appendix F proposes funding for the house from the Historic Preservation Fund allocation to the State Historic Preservation Office. In reality, grant funds for rehabilitation projects have not been available from this source since 1983, and are not expected to be available again in the near future without a significant increase in the federal appropriation. Clearly, more than "advice" is needed if the future of this endangered property is to be addressed. Active work on developing a viable new use for the property and on securing the necessary funding to implement that use is needed. (See our website at <http://www.mnhs.org/shpo/planning/primer.pdf> for guidelines in conducting a Reuse Study.) We also note that adherence to the Secretary of the Interior's Rehabilitation Standards would only be required if the work is funded or permitted by a federal agency, if the building is federally owned, or if the federal tax credits are being pursued. We would recommend that, should NPS decide not to acquire the house, you might consider a preservation easement that would ensure appropriate treatment in the future.

We look forward to visiting Pipestone National Monument and working with you and your staff to discuss the General Management Plan and other future initiatives. Contact Dennis Gimmestad at 651-259-3456 with any questions or concerns.

Sincerely,



Britta L. Bloomberg
Deputy State Historic Preservation Officer

cc: Don Stevens, NPS Midwest Office

RESPONSES

2. The GMP process is designed to provide a vision for the management of the Monument for the next 15 to 20 years. As such, the desired future conditions described within the General Management Plan tend to be directions the Monument will take in achieving the goals identified in the plan. Implementation of the general management plan will entail additional planning for specific actions to accomplish some of the goals and recommendations of the plan through the implementation phase. At that time, specific actions with specific impacts will be detailed. Each implementation phase will have its own compliance action, including adherence to the consultation requirements with the SHPO. However, at this level of planning, the implementation of the preferred alternative is not likely to have a direct adverse effect on cultural resources, keeping in mind the need for further planning and consultation.
3. In response to the lack of information specific to cultural landscapes, the Monument initiated an ethnographic landscape assessment in 2005. This report is scheduled to be finalized in early 2008. Although still in draft form, the current version of the report identifies a single cultural landscape; the report will assess the history of the Monument and the built elements within that landscape. Once complete, the report will address alternatives for management of that landscape and the State Historic Preservation Office will be provided an opportunity to review and comment on that report. In terms of data gaps with other cultural resources, the Monument will be working to acquire the necessary survey information before taking any actions that may impact these resources.

COMMENTS



Minnesota Department of Natural Resources

500 Lafayette Road
St. Paul, Minnesota 55155-40

COPY

April 12, 2007

Mr. Jim LaRock, Superintendent
Pipestone National Monument
36 Reservation Ave.
Pipestone, MN 56164-1269

RE: Draft General Management Plan / Environmental Impact Statement for Pipestone National Monument

Dear Mr. LaRock:

The Department of Natural Resources (DNR) has reviewed the Draft General Management Plan / Environmental Impact Statement (DGMP/EIS) for Pipestone National Monument (PNM), Pipestone County, MN. We offer the following comments for your consideration.

Sioux Quartzite Rock Formation and Sioux Quartzite Prairie (p. 17)

The document references a Minnesota Department of Natural Resources (DNR) report (1983b) that states, "The rock outcrop flora, however, appears to be fairly well protected from threat due to its unsuitability for other uses (Minn. DNR 1983b)." This statement does not represent the most recent findings of the department, which has conducted botanical surveys of rock outcrops over the past twenty years. The Minnesota County Biological Survey (MCBS) Unit within the DNR has documented that heavy grazing of livestock on rock outcrop vegetation can cause degradation and, in extreme cases, the elimination of many associated rock outcrop species. Furthermore, in recent years, many rock outcrops in southwestern Minnesota are being mined for the production of rock, sand and gravel. We recommend the statement in quotes be removed from the document and replaced with the MCBS Unit comments.

Threatened or Endangered Species and Species of Special Concern (pp. 19-21)

The following statement in the DGMP/EIS is incorrect: "two species have been dismissed because the national monument has no documented observations of them: the Dakota skipper and a lichen (*Buella nigra*) (p. 20)." The accompanying table, Table 1, Special Status Species and Critical Habitat at PNM (p. 21), also contains erroneous information about these species. Earlier documents sent by the DNR, as found in Appendix C, pp. 241-250, show that the lichen, *Buella nigra*, was last observed in 1999 and the Dakota skipper, *Hesperia dacotae*, in 1947, on PNM.

Enclosed please find an up-to-date Minnesota Natural Heritage and Nongame Research Program record of Element Occurrences (rare natural features) within PNM (March 7, 2007). Although the new report shows that some dates of observation have changed, it reaffirms the presence of species listed in the original report of December 12, 2000 that was included in the draft document. Our up-to-date records show that the last observation for *Buella nigra* was May 14, 1999, and *Hesperia dacotae*, July 7, 1968.

As the records indicate, management for the Dakota skipper should be considered in the DGMP/EIS because prairie management issues would affect a latent population of this butterfly. A species reintroduction may be feasible, considering the quality of prairie habitat in the park. DNR Information: 651-296-6157 • 1-888-646-6367 • TTY: 651-296-5434 • 1-800-657-3029

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RESPONSES

Responses to Minnesota Department of Natural Resources

1. Updated species occurrence information has been incorporated into the Final Environmental Impact Statement. The management actions proposed in the Draft General Management Plan / Draft Environmental Impact Statement would have no effect on either of the species, *Buella nigra* (a crustose lichen) and *Oarisma poweshiek* (Poweshiek skipperling). The lichen occurs in areas that will not be affected by fire or construction or other projects proposed in the Draft General Management Plan / Draft Environmental Impact Statement. The effects of fire on insects such as the poweshiek have been ongoing at the Monument since 1971 when the prescribed fire program began. The Fire Management Plan outlines and implements methods to protect pollinators from the impacts of fire. While the details of resource management are not a topic of the General Management Plan, copies of the Monument's Fire Management Plan/ Environmental Assessment, Prairie Management Plan, and Resource Management Plan are available upon request

RESPONSES

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Mr. LaRoeck
April 12, 2007
Page 2

As listed in Appendix C, on p. 241, Dr. Gerald Wheeler documented *Buellia nigra* in PNM in 1999. Dr. Wheeler's description is as follows: "NW edge of Pipestone, ca. 0.8 miles west of route 75 near summit of a precipitous west-facing quartzite outcrop, with *Pleopsidium fluvium*, *Dimelaena oreina*, *Aspicilia cinerea*, *Candelariella vitellina*. Plants infrequent on lower terrace and not observed on upper terrace." This record is also represented as a point in the spatial data in the Rare Features Database of the Minnesota Natural Heritage Information System (see the March 7, 2007 report). Prior to 1997, *Buellia nigra* had been known from only three locations in the world. Dr. Wheeler's 1997-1999 surveys located 18 new locations, mostly on crystalline bedrock outcrops along the Minnesota River. For additional information, please see the following publication: "Wheeler, G.A. 1999. New localities for *Buellia nigra* in Minnesota and the first report of this crustose lichen from South Dakota." The Michigan Botanist 38: 51-56.

The Poweshiek skipperling, *Oarisma poweshiek* (Hesperiidae), has been found in the vicinity of PNM and is likely a resident of its prairie habitat. According to the Minnesota Natural Heritage and Nongame Research Program, the species is presently listed as a Species of Special Concern but it is proposed for re-listing as Threatened. Minnesota's List of Endangered, Threatened, and Special Concern Species is currently open for public review. The Poweshiek skipperling has a long history of broad distribution throughout prairie remnants of western MN but extensive surveys in 2003-2006 found this species in very few locations. The Northern Prairie Wildlife Research Station (USGS) ranks the Poweshiek skipperling as one of the rarest skipper species in North America with its range restricted to the native tallgrass prairie of the Dakotas and Western Minnesota. This species is in need of conservation because of the loss of native habitat to crop production. For additional information on this species, please refer to the following document: "Selby, G. 2005. Status assessment and conservation guidelines: Poweshiek Skipperling (*Oarisma poweshiek* (Parker) (Lepidoptera: Hesperiidae). Prepared for Twin Cities Field Office, U.S. Fish and Wildlife Service, Bloomington, MN. 53 p."

Alternatives Including the Preferred Alternative (pp. 41-99)

The management goals of both Alternatives 1 and 3 do not include the ownership transfer of the Pipestone WMA to the National Park Service but promote the development of a closer working relationship with the Minnesota Department of Natural Resources on issues regarding the management of Pipestone WMA. The DNR would support the implementation of either of these options.

Alternative 2 proposes to enlarge PNM by adding the property presently managed as the Pipestone Wildlife Management Area (WMA). In addition, a 15-acre parcel on the northeast side of the monument would be added. The DNR Section of Wildlife has leased and managed the 113.4-acre Pipestone WMA on the behalf of the US Fish and Wildlife Service since the 1950's and considers the WMA an important area for hunting and fishing. Therefore, the DNR Section of Wildlife would not support the National Monument acquisition of this parcel. Since the existing National Monument property is not open to the public for hunting, the area occupied by Pipestone WMA also would likely be closed to hunting and fishing. When the U.S. Fish and Wildlife Service purchased the Pipestone WMA property, its original intent was to allow public hunting and other recreational opportunities. The Pipestone Wildlife Management Area serves as an important site for promoting hunter and angler recruitment, since the WMA is in close proximity to the city of Pipestone. It is crucial that these opportunities remain available to the public. If ownership were transferred to the National Park Service, the Department of Natural Resources would urge the administrators continue to allow the present suite of outdoor recreation activities.

RESPONSES

COMMENTS

Mr. LaRock

April 12, 2007

Page 3

Land Acquisition (pp. 42-43)

On pages 20-21, it is noted that The Nature Conservancy classifies the plant community type associated to Sioux quartzite outcrops as an endangered ecosystem. In this context, acquisition of nearby private lands that contain the same plant community type should be included in one of the alternatives.

The ridge of Sioux Quartzite outcrops continues north from the National Monument through Pipestone WMA and extends for nearly a mile farther northward on private land through the west side of Section 36, T107N, R46W (Troy Township). This part of Troy 36 contains a privately owned pasture. With permission of the landowner, Minnesota County Biological Survey (MCBS) surveyed the Troy 36 rock outcrops and found several of the very rare rock outcrop plant species that are found in PNM. Species occurring on the private land included: *Marsilea vestita*, *Limnsetella aquatica*, *Buchloe dactyloides*, and *Opuntia humifusa (macrochiza)*. In spite of grazing impacts, this pasture has a good diversity of common native prairie and rock outcrop species associated with the rock exposures. MCBS concluded that this tract is a high priority for conservation action. The DGMPEIS should include directives to pursue discussions with the Troy 36 landowner. The discussions should provide the landowner with information on the rare features found on his property and the significance of his land. The potential to develop a conservation easement or to purchase the land should be discussed with the landowner. The lands could become part of the WMA or be managed as part of the National Monument. Our records show that companies interested in mining the bedrock have approached this landowner. So far he has refused to negotiate a contract with them. Given that this pasture is part of the same bedrock system as found in the National Monument and that it is adjacent to the present WMA/National Monument, we recommend that the PNM plan mention the presence of this significant parcel and the need to work with the landowner on its conservation.

Pipestone Wildlife Management Area (pp. 46-47)

The following comment is in reference to this statement: "The landscape and resources are similar to those of the national monument, but this land is not actively managed as prairie (p. 46, 2nd paragraph)." In fall 2003, 55 acres of native prairie was restored using native seed harvested from the nearby Terrace WMA. To enhance the native prairie vegetation, prescribed burns are conducted on the unit at approximate 5-year intervals (a burn is planned for spring 2007).

The following comment is in reference to this statement: "Continuing the current management practices would not resolve concerns for the spread of exotic plant species...(p. 46, last paragraph)." Since 2005, the DNR has increased buckhorn removal efforts on the Pipestone WMA by clearing stems with an ASV loader mounted with a brusher unit. In addition, buckhorn trees were manually cut and Garlon was applied to stumps. The DNR treats noxious weeds, primarily consisting of Canada thistles, on an annual basis. Thistle patches are treated with Transline or Milestone chemical, by mowing, or by hand cutting. Other routine maintenance activities (i.e., sign posting, trash removal, etc.) are completed on the WMA as needed. More work still needs to be done to improve the native prairie habitat and control the re-growth and invasion of exotic species, but DNR continues to work toward that goal.

Prairie Restoration Zone (pp. 50)

The DGMPEIS presents useful prescriptions for management of the Prairie Preservation Zone. In addition, the DGMPEIS should contain recommendations that a management plan for the prairie zone be developed and circulated to conservation biologists for review. The prairie management plan should include a detailed listing of constraints, tasks, actions, and schedules involved in meeting objectives. Two downloadable documents found on the Society for Ecological Restoration International Web site (<http://SER.org>) may provide useful information

COMMENTS

Mr. LaRock
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Page 4

The names of the documents are "The SER Primer on Ecological Restoration" and "Guidelines for Developing and Managing Ecological Restoration Projects"

We recommend that the management designs for the Prairie Preservation Zone include considerations of how land treatments affect invertebrate and other sensitive prairie flora and fauna, especially when considering the application of prescribed fire. One issue that needs to be clarified is the extent to which the prairie zone is burned. Only a fraction of the prairie should be burned in any one year and burned areas should be allowed enough time to be re-colonized by invertebrate fauna before the remaining unburned area is subjected to burning. The restricted burning regime should be standard practice regardless of whether the Dakota skipper is present. Additional constraints are described in the following comment.

Threatened or Endangered Species and Species of Special Concern (pp. 125-126)

The plan reports that late spring fires affect the flowering success of the Western Prairie Fringed Orchid. However, with the variable weather patterns in recent years, "late spring" is a relative term. In their recent publication devoted to understanding the relationship of orchid growth at PNM to fire and climate, Willson *et al.*¹ recommend burning in early to mid-May, "before the orchids are fully emerged." Results of ongoing phenological studies by the MN DNR at Blue Mounds State Park, near Luverne, Minnesota, indicate that orchids may emerge earlier than the period reflected in the Willson study. For example, in 2005, half of 50 monitored orchids at Blue Mounds State Park had emerged to heights between 1.5 and 7 cm by May 6, with 9 orchids already emerged to heights in excess of 1/5 cm on the first monitoring date of April 18.² In an era of changing climate, it would be more appropriate to establish the burn date on the basis of the spring growth of orchids, allowing burning only if the orchids have not emerged from dormancy. The DGMPEIS should state that areas containing orchids would not be burned "after orchid emergence" instead of "in late spring."

There is a typographical error in the last paragraph on page 125. The scientific name of Topeka shiner is *Notropis topeka*. The paragraph also contains text that reads [the Topeka shiner has] "...not been found in the annual census since 1999." However, I hope R. Dodd (see contact information below) found the Topeka shiner in the park during a collecting trip to PNM on August 29, 2006.

The Preferred Alternative (Alternative 3) would have the most pronounced impact on Topeka Shiner and the White Prairie Fringed Orchid of any of the alternatives. The Preferred Alternative should be further refined to incorporate the new findings and additional measures should be taken to minimize impacts of the plan on these rare species.

Through its permit program, the DNR has received a fish community data set of collections made in 2006 in PNM. In case the NPS has not received this data set, we are providing contact

¹ Gary D. F. Willson, Adnan Akyuz, and Manda J. Page, "Precipitation and fire effects on flowering of a threatened prairie orchid. *Natural Resource Year in Review*, 2005. http://www2.nature.nps.gov/YearReview/02_N.html This document link is functional. Accessed February 22, 2007

² Judith Beckman. Unpublished phenology data. Minnesota Natural Heritage and Nongame Research Program, Minnesota Department of Natural Resources, Box 25, 500 Lafayette Road, St. Paul, MN 55155-4025.

RESPONSES

2.

2. The information regarding the Topeka shiner on page 125 has been corrected.

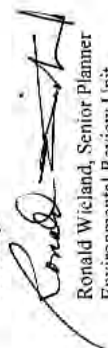
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Mr. LaRock
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Page 5
information for the collector: Hope R. Dodd, Fisheries Biologist, Department of Biology,
Missouri State University, 901 S. National Avenue, Springfield, MO 65897
417-836-3163.

Thank you for the opportunity to review this document. Please contact me with any questions regarding this letter.

Sincerely,



Ronald Wickland, Senior Planner
Environmental Review Unit
Division of Ecological Services
(651) 259-5115

Enclosure – Element Occurrences within PNM

c: Mark Mamuska, Steve Colvin, Todd Kolander, Matt Langan, Lisa Joyal, Wendy Krueger,
Richard Baker, Nancy Sather, Robert Dana, Fred Harris, John Schladweiler

ERDB#20070570-0001
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RESPONSES

COMMENTS

Minnesota Natural Heritage & Nongame Research Program
Short Record Report of Element Occurrences within Pipestone National Monument
T106N R46W Sections 1 & 2
Pipestone County

Page 1 of 2

Element Name and Occurrence Number	Federal Status	MN Status	State Rank	Global Rank	Last Observed Date
Pipestone County, MN					
<u><i>Ammodramus henslowii</i></u> (Henslow's Sparrow) #2 Location Description: T106N R46W S2, T106N R46W S12, T106N R46W S1		END	S1B	G4	1980-11-10-PRE
<u><i>Bacopa rotundifolia</i></u> (Water-hyssop) #7 Location Description: T106N R46W S2, T106N R46W S12, T106N R46W S11, T106N R46W S1		SPC	S3	G5	1963-09-10
<u><i>Buchloe dactyloides</i></u> (Buffalo Grass) #1 Location Description: T106N R46W S2, T106N R46W S12, T106N R46W S11, T106N R46W S1		SPC	S3	G4G5	1961-09-29
<u><i>Buchloe dactyloides</i></u> (Buffalo Grass) #3 Location Description: T106N R46W S2, T106N R46W S12, T106N R46W S11, T106N R46W S1		SPC	S3	G4G5	1954-09-15
<u><i>Buchloe dactyloides</i></u> (Buffalo Grass) #7 Location Description: T106N R46W S1, T106N R46W S12, T107N R46W S35, T107N R46W S36		SPC	S3	G4G5	1979-06-27
<u><i>Buellia nigra</i></u> (A Species of Lichen) #19 Location Description: T107N R46W S36, T106N R46W S1		END	S1	G1G2	1999-05-14
<u><i>Buellia nigra</i></u> (A Species of Lichen) #20 Location Description: T106N R46W S1		END	S1	G1G2	1999-05-13
<u><i>Cyperus acuminatus</i></u> (Short-pointed Umbrella-sedge) #2 Location Description: T107N R46W S36, T107N R46W S35, T106N R46W S1, T106N R46W S11, T106N R46W S12, T106N R46W S2, T106N R46W S3		THR	S2	G5	1961-09-11
<u><i>Hesperia dacotae</i></u> (Dakota Skipper) #26 Location Description: T107N R46W S36, T106N R46W S2, T106N R46W S12, T106N R46W S24, T106N R46W S11, T106N R46W S1, T107N R46W S35	C	THR	S2	G2	1968-07-07
<u><i>Heteranthera limosa</i></u> (Mud Plantain) #2 Location Description: T106N R45W S6, T106N R46W S12, T106N R46W S1		THR	S2	G5	1956-09-11
<u><i>Isoetes melanopoda</i></u> (Blackfoot Quillwort) #2 Location Description: T106N R46W S1		END	S1	G5	1979-06-26
<u><i>Limosella aquatica</i></u> (Mudwort) #1 Location Description: T106N R46W S1, T106N R46W S12		SPC	S3	G5	1979-06-27
<u><i>Limosella aquatica</i></u> (Mudwort) #4 Location Description: T106N R46W S2, T106N R46W S12, T106N R46W S1		SPC	S3	G5	1963-06-18
<u><i>Marsilea vestita</i></u> (Hairy Water Clover) #2 Location Description: T106N R46W S12, T106N R46W S1, T107N R46W S36		END	S1	G5	1946-06-20

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Minnesota Natural Heritage & Nongame Research Program
Short Record Report of Element Occurrences within Pipestone National Monument
T106N R46W Sections 1 & 2
Pipestone County

Page 2 of 2

Element Name and Occurrence Number	Federal Status	MN Status	State Rank	Global Rank	Last Observed Date
Pipestone County, MN					
<u>Native Plant Community, Undetermined Class</u> #596 Location Description: T106N R46W S2, T106N R46W S1		N/A	SNR	GNR	1983-08-08
<u>Native Plant Community, Undetermined Class</u> #626 Location Description: T107N R46W S36, T106N R46W S2, T106N R46W S1, T107N R46W S35		N/A	SNR	GNR	1983
<u>Notropis topeka</u> (Topeka Shiner) #1 Location Description: T107N R46W S35, T106N R46W S1, T106N R46W S2	LE	SPC	S3	G3	2003-07-31 August 29, 2006 RGW
<u>Opuntia macrorhiza</u> (Plains Prickly Pear) #5 Location Description: T107N R46W S36, T106N R46W S1, T106N R46W S2, T107N R46W S35, T107N R46W S26		SPC	S3	G5	1967-06-09
<u>Plantago elongata</u> (Slender Plantain) #1 Location Description: T106N R46W S1		THR	S2	G4	1967-06-09
<u>Platanthera praecleara</u> (Western Prairie Fringed Orchid) #40 Location Description: T106N R46W S1, T106N R46W S2	LT	END	S1	G2	2006-07
<u>Schedonnardus paniculatus</u> (Tumblegrass) #3 Location Description: T106N R45W S6, T107N R45W S30, T107N R46W S35, T107N R46W S25, T106N R46W S1, T107N R46W S36, T107N R45W S31		SPC	S3	G5	1959-06-16
<u>Schedonnardus paniculatus</u> (Tumblegrass) #4 Location Description: T106N R46W S2, T106N R46W S12, T106N R46W S11, T106N R46W S1		SPC	S3	G5	1954-09-14

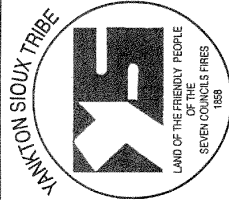
Records Printed = 22

RESPONSES

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COPY

Yankton Sioux Tribe



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(605) 384-3804 / 384-3641
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May 31st 2007

Jim LaRock
National Park Service
Superintendent Pipestone National Monument
36 Reservation Avenue
Pipestone, Minnesota 56164

Mr. LaRock:

The Yankton Sioux Tribe has approved of comments for the "Draft General Management Plan/Environmental Impact Statement: Pipestone National Monument, or "Oico 'Tun'kan 'duta" Pipestone Quarry. We also want to state that we are still in consultation according to Section 106 process with the National Park Service.

These comments were approved by the Yankton Sioux Tribe Tribal General Council at a Emergency Meeting held on May 29th 2007.

If there are any questions that you may have, please feel free to contact this office at 605-384-3641, Ext.# 248.

Lisa Arrow
Lisa Arrow
Secretary, Business and Claims Committee
Yankton Sioux Tribe

cc: file
cc: YST Business and Claims Committee

MEMBERS:
TERRY BRUGUIER, SR.
DARRELL E. DRAPEAU
DENNIS RUCKER
EVERDALE SONG HAWK
BRENDA ZEPHIER

OFFICERS:
ROBERT COURNOYER, CHAIRMAN
HAN COURNOYER, JR., VICE CHAIRMAN
LISA ARROW, SECRETARY
JOHN W. SULLY, SR., TREASURER
Business and Claims Committee YST

RESPONSES

COMMENTS

 YANKTON SIOUX TRIBE LAND OF THE PURSUIVLY PEOPLE OF THE SEVEN COUNCIL FIRES 1864 Yankton Sioux Tribe Box 248 Marty, SD 57361 (605) 384-3804 / 384-3641 FAX (605) 384-5687	OFFICIAL COMMENTS SUBMITTED BY: The Ihanktonwan Dakota/Nakota or Yankton Sioux Tribe of the Oceti Sakowin (Seven Council Fires) "Keepers of the Quarry" Of Marty, South Dakota May 29, 2007 Concerning the "Draft General Management Plan/Environmental Impact Statement: Pipestone National Monument, or "Oicu Tun'kan'duta" Pipestone Quarry Approved by the General Council of the Ihanktonwan at a Special Meeting held regarding this issue on May 29, 2007	OFFICERS: ROBERT COURNOYER, CHAIRMAN STEPHAN COURNOYER, JR., VICE CHAIRMAN LISA ARROW, SECRETARY JOHN W. SULLY, SR., TREASURER MEMBERS: TERRY BRUGUIER, S DARRELL E. DRAPEA DENNIS RUCKER EVERDALE SONG (HA) BRENDA ZEPHIER <i>Business and Claims Committee #57</i>
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**Ihanktonwan
Pipestone
"Keepers"
1927**



Further hearings on the Red Pipestone Quarry land claim, Pipestone Minnesota, September 30, 1927. Philip Deloria is standing in the fifth row from the bottom, on the left. National Archives.

Responses to the Yankton Sioux Tribe

- 1. See response 2 to the Bureau of Indian Affairs.

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OFFICIAL POSITION OF THE IHANKTONWAN GENERAL COUNCIL OF THE OCETI SAKOWIN (SEVEN COUNCIL FIRES) IN REGARD TO THE PIPESTONE QUARRY

The Ihanktonwan Dakota/Nakota Band of the Oceti Sakowin makes it known to all parties, federal, state, international and all other relevant bodies; that we consider the Treaty of 1858 and the 1892 Agreement as coerced documents produced by the United States Government under extreme duress of the Ihanktonwan People. These documents were obtained through starvation methods, confinement and threat of annihilation of our Nation.

An act of dehumanization took place, when the United States government declared us incompetent to conduct our own affairs. Any agreement obtained through coercion is considered null and void by virtue of the fact that it was obtained under duress in an inhumane way. Unilateral agreements like the Treaty of 1858 and the 1892 Agreement violate the principle of prior, free and informed consent. This was demonstrated clearly by repeated votes and re-votes which were forced upon the Yankton People until a government-desired vote was achieved. The White Swan community was the last to sign the 1892 Agreement, saying "You've killed us, we've starved, until we have no choice but to sign." Children were starving.

With these principles in place, we continue to assume our responsibilities over the management of the Pipestone Quarry in an active way, based on an inherent aboriginal responsibility and right as "keepers of the Quarry". This inherent responsibility is recognized and respected by the Oceti Sakowin (Seven Council Fires).

We take this responsibility with great seriousness. We choose to exercise this responsibility with the greatest of caution and commitment. Further, with the support of the Oceti Sakowin, we are prepared to pursue appropriate methods to protect the Quarry for the current generations and the unborn.

General Council Statement, May 29, 2007

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AMENDED COMMENTS SUBMITTED REGARDING THE
PIPESTONE QUARRY MANAGEMENT

May 29, 2007

I. INTRODUCTION The Yankton Dakota, i.e., *Ihanġ'ŋonway* "Camps at the End," are historically acknowledged as the *kiciyuhapi* "keepers" of the pipestone quarry, which in Dakota is called *čanġ(n)ihupa ša k'a pi* "to dig red pipes," or *čanų ōt'e*; or *oicu tuġ'kanj'duta* "Pipestone Quarry." For generations the Yankton Dakota, and their relatives the Mdewakanton'wan "Dwellers of the Spirit Lake," Wahpe'kute "Leaf Shooters," Wahpeton'wan "Leaf Dwellers," Sisi'ton'wan "Slimy Ones," Ihanġ'ŋonwanja "Little Camps at the End," Sicąngu "Burnt Thigh," Oġlala "Scatters their Own," Mnikówoju "Plants beside Water," Itázipcó "Without Bow," Hunkpapa "Camps on the End of Horns," Sihá Sápa "Blackfeet," Óóohenuppa "Two Boilings," and the Pa baksá "Cut Head,"; other Teton/Dakota/Nakota and displaced Oceti Sakowin Bands, such as the Santee/Isanti "knife village" have suffered cultural and emotional harm as a result of the taking of the Pipestone reservation by the U.S. government, and its subsequent development into a National Park. Virtually all other Oceti Sakowin Bands (Seven Council Fires) considered the Pipestone Quarry as a place of peace, gathering and holiness. Even the bands who fled north from the government into Canada, continue to maintain their connections with Pipestone. Beginning with Henry T. Davis, the first known homesteader to settle on lands within the reservation, the Yankton have always opposed any intrusions into the reservation by non-Indians. The Yankton Dakota and their relatives listed above, all hold the *čanġ(n)ihupa ša k'a pi* "to dig red pipes," and the associated rock formation called *witaj'šna ya'nni mini* "three maidens," as a *kabda'ya* "holy place." Circa 1878 the Yankton lodged an official complaint with their Agent, Major Andrews, concerning intrusions into the reservation by non-Indian homesteaders, and whites quarrying stone for retail purposes. The Yankton have never given up their treaty right to access the quarry and procure the sacred red stone commonly called in Dakota, *we oyáte kitj* "the blood of the people," i.e., catlinite. This presence of the Ihanġonwan at Pipestone has taken place since time immemorial, and will continue.

II. RECOMMENDATIONS

The following commentary is provided by the Ihanġonwan Dakota/Nakota Sioux Tribe of Indians, Marty, South Dakota, concerning the management of Pipestone Quarry in Pipestone County, Minnesota. After careful review of the current management situation, the Ihanġonwan make the following recommendations:

- A. **In making these comments we reserve the right to raise compelling issues at a later date. We submit these recommendations under protest with the knowledge in mind, that we were coerced and starved into signing for the sale of the Pipestone Quarry. This historical trauma exists in our current families and we steadfastly**

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will continue to seek remedies for the return of Pipestone to the Oceti Sakowin (Seven Council Fires).

B. We seek to obtain a global moratorium on the sale of Pipestone. It is the life-blood of our people and should not be sold for tourism purposes. Pipestone is “wakan”, or holy to our people. According to our Dakota laws, it is illegal to sell pipestone in any form for anything due to its holy and endangered status. It is important to remind all that the Ihanktonwan guard the sacred red pipestone as it was gifted to our people by the White Buffalo Calf Woman, which has reiterated this as the “most sacred of sacred places” for the Oceti Sakowin.

C. We are in a consultation process and status at this time, according to Section 106. We can be afforded the necessary time to pursue this process to mutual satisfaction.

D. After the submission of these comments we advise that Pipestone schedule an on-site consultation with us to discuss the recommendations. We request that the National Park Service seek consultation funds to assist the tribes in travel costs to consult at Pipestone.

E. We recommend that the Canadian Dakota/Nakota Tribes be invited to the consultation process as they pray at Pipestone, utilize the quarry and were originally part of the Oceti Sakowin. We can provide names to the Pipestone Monument Staff.

F. By a wide consensus, the Ihanktonwan recommend that there be no Sundances at the Pipestone Quarry. This is a strong recommendation.

G. After reviewing the Archaeological Study of Pipestone, the Yankton strongly desire and require the agency to fund a Yankton Sioux comprehensive TRADITIONAL CULTURAL PROPERTY SURVEY of the Pipestone National Monument area. The TCP survey will consist of identifying traditional cultural property sites lying within the boundaries of the national monument by utilizing the Identification and Typing System for Traditional Cultural Properties “ITS-TCPs;” a unique Lakota TCP survey methodology and taxonomy designed to locate and identify a Dakota/Lakota TCP or site. Other Yankton oral history and site information will be integrated by elders into this taxonomy. A

2. The Monument is required to comply with the American Indian Religious Freedom Act (the Act) as amended (Public Law 95-341, 42 U.S.C. 1996 and 1996a). The Act protects and preserves for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonies and traditional rites. As such, Sun Dances will be permitted within the Monument grounds though issuance of a Special Use Permit. The Monument encourages open dialog between Sun Dance organizers and concerned tribes and citizens to resolve this issue.
3. The request for funding of a Traditional Cultural Property (TCP) Survey is considered a desirable addition of information for the management of Monument resources. The Monument's need for additional cultural/ethnographic information is already mentioned in the alternatives (pages 57, 65, 72, and 79). Funding will be sought to complete such a project and usual government procurement procedures would be followed to secure a contractor to complete the study.

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3. recent archaeological inventory and overview of Pipestone National Monument was conducted by Scott, Thiessen, Richner, and Stadler (Scott et al. 2006) which characterizes the national monument as both a historic and archaeological resource. The Yankton are contesting this sole characterization, however, and the Yankton are asserting that a traditional cultural property survey and study of the quarry area be performed by the Yankton and underwritten financially, by the Park Service Agency in order to determine which localities and places within the national monument are identified by the Yankton and their relatives as sites and remind them that the whole area is considered a TCP, including documented, undisclosed and undiscovered redstone areas; including water rights. This is a Sacred Site in entirety.	3. Ethnobotanical information has already been obtained by the 2003 ethnobotany study completed by the University of Arizona. The study included interviews with members of various tribes including Yankton elders.
4. H. The Yankton also officially request that National Park Service integrate into their on-going funding appropriations, the creation of a minimum of two full-time tribal persons to be employed at Pipestone as on-site "keepers of the quarry" designated to work for the tribal management of Pipestone. It is preferable that these individuals be Yankton, in line with our tribal responsibility; however qualifications and cultural background can have an impact, from other tribes. Job descriptions would be created and funding sought if necessary from Congress, much like the Spaulding Interpretive Center of the Nez Perce; or worked into the current Pipestone budget requests. These individuals would work closely with the Tribal Consultation/Transition Group and the Pipestone Management.	4. The establishment of a Superintendent's Indian Advisory Committee called for in the Draft General Management Plan should fulfill the desire of the Yankton tribe to be more closely involved in the management of the Monument. The current base budget of the Monument does allow for the filling of these positions; however, adding additional unfunded positions is not possible at this time. Yankton tribal members as well as members of other tribes are encouraged to apply for National Park Service positions as they are advertised. We will continue to forward seasonal and permanent position openings to all the tribal offices.
5. I. The Yankton recommend and respectfully request that the Hiawatha Pageant be moved to a different location. There is no indication in the management plan that a carrying capacity study will be undertaken to determine how much human use occurring in the Three Maidens area during the pageant could occur before the environmental integrity of the site is damaged. According to the Pipestone Chamber & Visitor Center website "....the annual Hiawatha Pageant draws thousands of visitors to Pipestone..." (no author specified, 2007). The overflow of pageant visitors into the reservation must impact the environment of the Three Maidens site area to some degree, and yet there is no mention of this human impact to a traditional cultural property sacred site lying within the complex boundaries of the reservation that is culturally affiliated to the Yankton and their relatives. We insist that a carrying capacity study be undertaken on the Three Maidens site area. Quarriers recognize that this site is an offering site that they pray at before digging pipestone.	5. The Hiawatha Pageant occurs on property not owned or managed by the National Park Service. Efforts to work with the Hiawatha Club to reduce the impact of the pageant on the Three Maidens sacred site have been made and will continue to be pursued as described under Alternative 1 (page 65). The previous response to the request for a carrying capacity study of the Hiawatha pageant also applies to this comment.

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J. The Yankton recommend that the ethnobotany/plant management staff consult with medicinal plant and spiritual practitioners convened by the Yankton to make recommendations for the current plants present and those being restored. These comments will be incorporated into the Traditional Cultural Property Survey work.

K. After careful review of the Draft General Management Plan, by and large the Yankton Sioux Tribe favors and endorses most of the elements of Alternative #1, as described in the DGM/EIS beginning on page 59, WITH THESE EXCEPTIONS:

1. No sundances at the quarry
2. No pageant recommended at the Three Maidens area or anywhere on the site, or where the stone lies.

For the Yankton people, Alternative #1 within the DGM/EIS is the only proposed federal undertaking that is endorsable by the tribe. Alternative #1 provides an opportunity to have the landscape of the reservation restored as much as possible to its prehistoric natural setting through the process of removing the visitor center and associated parking lot from among the quarries, and initiate a prairie restoration project within the vacated area to reintroduce native grasses and plants.

Alternative #1 emphasizes reducing development within the national monument which is a strategy wholly supported by the Yankton. All efforts to end development within the reservation, to preserve the natural phenomenological setting of the quarries, to preserve the native history of the site, *a history which provides the cultural significance for it that helped establish and maintains pipestone as a national monument*, and preserve the spiritual significance of the monument as a source of sacred red pipestone, are the kinds of federal undertakings that the Yankton favor.

L. Lastly, the Yankton favor the development of an Indian Consultation / Transition Team to oversee the preservation of the Pipestone Quarries from a Native Perspective and management presence.

In conclusion, these comments are officially submitted by the Yankton Tribal (Ihanktonwan) General Council in consultation with the Tribal Cultural Committee, the Treaty Steering Committee, Sundance leaders and Pipestone Run families present at a Tribal Consultation meeting with Pipestone Monument staff on May 14, 2007 at Ft. Randall Casino on the Yankton Reservation. Individual tribal

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members of quarrier families, a woman's society, other societies and those invested in the protection of Pipestone also submitted comments. Other Tribes such as the Santee, the Sisseton, and the Lower Sioux were also in support of the Yankton position at this consultation on May 14, 2007. Other tribes of the Oceti Sakowin have advised us that they will be submitting tribal resolutions in support of the Yankton position once these comments are approved by the official governing body of our tribe, the General Council.

These comments have been reviewed, accepted and approved for submission to Pipestone Management purposes, by the General Council of the Ihanktonwan Dakota/Nakota on May 29, 2007.

(See attached meeting notes from Official Tribal Consultation held on May 14, 2007, requested by the Tribe with Pipestone Monument Officials for input and comments. The Tribe initiated Sec 106 consultation at that time. See following notes.)

RESPONSES

COMMENTS



Box 248
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(605) 384-3804 / 384-3641
FAX (605) 384-5687

Official Comments Submitted By:
THE CULTURAL COMMITTEE OF THE
thanktonwan Dakota/ Yankton Sioux Tribe
"Keepers of the Pipestone Quarry"

Of

Marty, South Dakota
May 14, 2007

Concerning the
"Draft General Management Plan/Environmental Impact
Statement: Pipestone National Monument, Pipestone County,
Minnesota

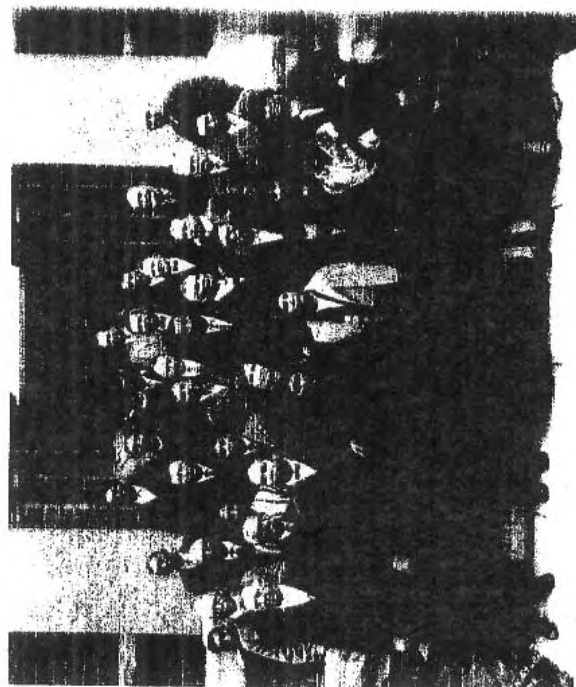
At a Tribal Consultation held on May 14, 2007
Ft. Randall Casino, Wagner, SD

OFFICERS: ART COURNOYER, CHAIRMAN COURNOYER, JR., VICE CHAIRMAN ISA ARROW, SECRETARY J.W. SULLY, SR., TREASURER	402 661 1982 P.1
<i>Business and Claims Committee #57</i>	NPS/MNRD 2ND FLOOR 54101 4802-22-07N
MEMBERS: TERRY BRUGUIER, SR. DARRELL E. DRAPEAU DENNIS RUCKER EVERDALE SONG HAWK BRENDA ZEPHIER	

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Ihanktonwan Pipestone "Keepers" 1927



Further hearings on the Red Pipestone Quarry land claim, Pipestone Minnesota, September 20, 1927. Philip Deloria is standing in the fifth row from the bottom, on the left. National Archives.

COMMENTS

RESPONSES

The following commentary is provided by the Ihanktonwan Dakota/Yankton Sioux Tribe of Indians, Marty, South Dakota, concerning the "Draft General Management Plan/Environmental Impact Statement: Pipestone National Monument, Pipestone County, Minnesota." After careful review of the DGM/EIS¹ the Yankton Sioux Tribe favors and endorses the implementation of Alternative #1 as described in the DGM/EIS beginning on pp. 59. The Yankton Dakota, i.e., *Ihanjĕ' tonwan* "Camps at the End," are historically acknowledged as the *kiciyuhapi* "keepers" of the pipestone quarry, which in Dakota is called *čand(n)úhupa ša k'a pi* "to dig red pipes," or *čanyų ók'e*, or *oicu tuų'kan'duta* "Pipestone Quarry."

For generations the Yankton Dakota, and their relatives the Mdewakanton' wan "Dwellers of the Spirit Lake," *Wahpe' kute* "Leaf Shooters," *Wahpetonwan* "Leaf Dwellers," *Sisi' tonwan* "Slimy Ones," *Ihanjĕ' tonwanja* "Little Camps at the End," *Sicángu* "Burnt Thigh," *Oglála* "Scatters their Own," *Manikówoju* "Plants beside Water," *Itázipcô* "Without Bow," *Húŋkpapa* "Camps on the End of Horns," *Sihá Sápa* "Blackfeet," *Oóohenunpa* "Two Boilings," and the *Pa baksá* "Cut Head,"; other Teton/Dakota/Nakota and displaced Oceti Sakowin Bands, such as the Santee/Isanti "knife village" have suffered cultural and emotional harm as a result of the taking of the Pipestone reservation by the U.S. government, and its subsequent development into a National Park. Virtually all other Oceti Sakowin Bands (Seven Council Fires) considered the Pipestone Quarry as a place of peace, gathering and holiness. Even the bands who fled north from the government, continue to maintain their connections with Pipestone. Beginning with Henry T. Davis, the first known homesteader to settle on lands within the reservation, the Yankton have always opposed any intrusions into the reservation by non-

¹ Draft General Management Plan/Environmental Impact Statement

COMMENTS

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Indians. The Yankton Dakota and their relatives listed above, all hold the *éan(n)áúhupa* *ša k'a pi* "to dig red pipes," and the associated rock formation called *wítanj'ína ya' mni* "three maidens," as a *kabáda'ya* "holy place." Circa 1878 the Yankton lodged an official complaint with their Agent, Major Andrews, concerning intrusions into the reservation by non-Indian homesteaders, and whites quarrying stone for retail purposes. The Yankton have never given up their treaty right to access the quarry and procure the sacred red stone commonly called in Dakota, *we oyáde kítj* "the blood of the people," i.e., catinite. Under Article 8, of the 1858 Treaty with the Yankton Sioux, April 19, 1858, (11 Stat., 743), ratified February 16, 1859, and proclaimed February 26, 1859, the Yankton secured their right to continue quarrying the stone.

"ARTICLE 8: The said Yankton Indians shall be secured in the free and unrestricted use of the red pipe-stone quarry, or so much thereof as they have been accustomed to frequent and use for the purpose of procuring stone for pipes; and the United States hereby stipulate and agree to cause to be surveyed and marked so much thereof as shall be necessary and proper for that purpose, and retain the same and keep it open and free to the Indians to visit and procure stone for pipes so long as they shall desire."

Note: This Treaty agreement precedes all other statements such as the one made on page 42 of the Draft Management Plan which states that pipestone quarrying is reserved to "individual Indians of all Tribes", not to particular tribes. It must be clear that although other Tribes have access to this holy place, other Tribes of the Seven Council Fires "Oceti Sakowin" clearly support that the Yanktons were and continue to be the "kicuyhapi" of the pipestone quarry. This recognition and responsibility is humbly recognized by the Ihanktonwan; and in fact certain protocols were observed humbly.

For the Yankton people, Alternative #1 within the DGM/EIS is the only proposed federal undertaking that is endorsable by the tribe. Alternative #1 provides an opportunity to have the landscape of the reservation restored as much as possible to its prehistoric natural setting through the process of removing the visitor center and associated parking lot from among the quarries, and initiate a prairie restoration project within the vacated

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area to reintroduce native grasses and plants. Alternative #1 emphasizes reducing development within the national monument which is a strategy wholly supported by the Yankton. All efforts to end development within the reservation, to preserve the natural phenomenological setting of the quarries, to preserve the native history of the site, *a history which provides the cultural significance for it that helped establish and maintains pipestone as a national monument*, and preserve the spiritual significance of the monument as a source of sacred red pipestone, are the kinds of federal undertakings the Yankton Dakota favor.

Alternative #1 also proposes that the ceremonial use zone located on the north boundary line of the reservation would undergo seeding with locally harvested tallgrass prairie plant species, and actively remove nonnative plant species from the zone (DGM/EIS, 2006:63). Such proposed activities as this are supported by the Yankton, however, there is this following statement contained within the Ceremonial Use Zone section:

"A carrying capacity study would be undertaken to determine how much human use could occur within the zone before it would cause environmental damage. After this determination, ceremonial events would *not be allowed* [Yankton emphasis] to exceed the maximum capacity. Identifying and enforcing the carrying capacity would allow the natural healing of the site between uses." (DGM/EIS, 2006:63)

The purpose of this carrying capacity study within the ceremonial use zone would be to determine the human carrying capacity of the zone. Regarding this proposed study the Yankton categorically reject the idea that such a study be undertaken as it equates and characterizes Native American people who attend the annual Gathering of the Sacred Pipes Sundance with livestock. The Yankton and their relatives, and Native American

1. The prescribed carrying capacity study of the Sun Dance grounds will seek to ensure the continued availability of the property for ceremonial/religious uses over time. The study will assess the qualities of the property that are most valued to the Sun Dance attendees, assess what impacts are occurring to the property as a result of the use, and define acceptable levels of damage. We consider this study to be an assessment of both social values and resource values that will sustain the use of this property for religious events over time. It is not meant to reduce the use of the property or limit religious practices.

A carrying capacity study at the Hiawatha grounds is not warranted. The portion of the pageant that occurs on federal property is negligible; the majority of use is on property owned solely by the Hiawatha Club. The Monument has already lessened the impacts of the pageant by limiting certain uses of the Three Maidens through the annual permit process. Adoption of Alternative 1 would eliminate contact with the Three Maidens during the production of the Hiawatha Pageant (page 65).

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1.
cont.

people as a whole, are not *ptegdéska/pté yanampi* “tame cattle” to be counted, husbanded, or cullled. This study recommendation is one of the most paternalistic, asinine, culturally insensitive, and racist statements ever contained within a federal document. Invoking the phrase: “...Identifying and enforcing the carrying capacity would allow the *natural healing of the site* [Yankton emphasis] between uses...” (DGM/EIS, 2006:63) is interpreted by the Yankton as a poor, thinly veiled, tactless attempt by the federal agency to impose upon Native Americans accessing the ceremonial use zone for ceremonial purposes, regulatory practices which would empower the agency with an ability to hinder, limit, and/or prevent Native Americans from annually congregating and performing a traditional ceremonial activity. The Yankton state that it is imperative that this language pertaining to the proposed carrying capacity study must be stricken from Alternative #1 as it is **not**, repeat, **not**, supported by the Yankton.

For the record, there is language in Alternative #1 which states that the Hiawatha Club would under a restricted permit continue to use the Three Maidens area during the Hiawatha Pageant which indicates the agency regulating use of the area. However, there is no indication that a carrying capacity study will be undertaken to determine how much human use occurring in the Three Maidens area during the pageant could occur before the environmental integrity of the site is damaged. According to the Pipestone Chamber of Commerce & Visitor Center website “...the annual Hiawatha Pageant draws thousands of visitors to Pipestone...” (no author specified, 2007). The overflow of pageant visitors into the reservation must impact the environment of the Three Maidens site area to some degree, and yet there is no mention of this human impact to a traditional cultural property sacred site lying within the complex boundaries of the reservation that is culturally

COMMENTS	RESPONSES
1. cont. affiliated to the Yankton and their relatives. If the agency is determined to carryout its proposed carrying capacity study of the ceremonial use zone, then the Yankton must insist upon a similar carrying capacity study is undertaken on the Three Maidens site area as well. Quarriers recognize that this site is still an offering site to dig pipestone. The Ihanktonwan endorse the creation of a superintendant's Indian consultation group, however the question the meaning of "informal consultation group."? This must be framed and acceptable to the Tribes beforehand. As stated above, and reiterated here, the Yankton Sioux Tribe of Indians, favors and endorses the implementation of Alternative #1 as described in the DGM/EIS, however, excluding the language describing the proposed carrying capacity study described on page 63. Additionally the Yankton Sioux Tribe desires and requests the agency to fund a Yankton Sioux comprehensive traditional cultural property survey of the Pipestone National Monument. The TCP survey will consist of identifying traditional cultural property sites lying within the boundaries of the national monument by utilizing the Identification and Typing System for Traditional Cultural Properties "ITS-TCPS;" a unique Lakota TCP survey methodology and taxonomy designed to locate and correctly identify a Lakota TCP or a Lakota TCP site. A recent archaeological inventory and overview of Pipestone National Monument was conducted by Scott, Thiessen, Richner, and Stadler (Scott et al, 2006) which characterizes the national monument as both a historic and archeological resource. The Yankton are not contesting this characterization, however, the Yankton are asserting that a traditional cultural property survey and study of the national monument performed by the Yankton Sioux Tribe be undertaken, and underwritten financially, by the agency in order to determine which localities and places	2. The request for funding of a Traditional Cultural Property (TCP) Survey is considered a desirable addition of information for the management of Monument resources. The Monument's need for additional cultural/ethnographic information is already mentioned in the alternatives (pages 57, 65, 72, and 79). Funding will be sought to complete such a project and usual government procurement procedures would be followed to secure a contractor to complete the study. Ethnobotanical information has already been obtained by the 2003 ethnobotany study completed by the University of Arizona. The study included interviews with members of various tribes including Yankton elders.

2.

COMMENTS

RESPONSES

2.

within the national monument are identified by the Yankton and their relatives as sacred sites, offering sites, and gathering sites.

3.

The Yankton also officially request that National Park Service funding provide for the creation of a minimum of one/preferably two full-time tribal person(s) to be employed at Pipestone as on-site "keepers of the quarry" designated to work with the tribal management of Pipestone. It is preferable that these individuals be Yankton, in line with our Tribal responsibility; however qualifications and cultural background can have an impact, from other tribes. A job description would need to be created and funding sought in Congress, much like the Spaulding Interpretive Center of the Nez Perce; or worked into the current Pipestone budget request. These individuals would work closely and cooperatively with the Tribal Consultation Group and the Pipestone Management.

Yankton Tribal Members and elders also object to the sale of Pipestone items for tourist exploitation purposes at the visitor center. The sale of pipestone is akin to the sale of Jesus's garments in Christian religion. The pipestone is considered "wakan" or holy to our people.

These comments are officially submitted by the Tribal Cultural Committee at a requested Consultation, including other interested Tribes, with Pipestone Management Staff at Ft. Randall Casino, on Ihanktonwan lands on May 14, 2007.

It is further recognized that individual families (tiwahe); extended families (tiyospaye); individual family quarrier representatives; Sundance families; Pipestone Sacred Run families; Ihanktonwan Treaty Steering Committee Representative and individual members of the Ihanktonwan will be present at this meeting and will be invited to present their individual oral comments for the record. This document however is the

3. The establishment of a Superintendent's Indian Advisory Committee called for in the Draft General Management Plan should fulfill the desire of the Yankton tribe to be more closely involved in the management of the Monument. The current base budget of the Monument does allow for the filling of these positions; however, adding additional unfunded positions is not possible at this time. Yankton tribal members as well as members of other tribes are encouraged to apply for National Park Service positions as they are advertised. We will continue to forward seasonal and permanent position openings to all the tribal offices.

RESPONSES

COMMENTS

official Tribal position with added comments from Yankton relatives present. We plan to provide more in-depth comments after the requested TRADITIONAL CULTURAL PROPERTY SURVEY is conducted and completed and the Tribal Consultation Groups is formed. These two events will provide for addendums to this document.

For additional tribal comments concerning the DGM/EIS please contact: Yankton Sioux Tribe Cultural Committee, Marty, South Dakota, eaglerax@hotmail.com.

Evelyn Blackmoon

Faith Spotted Eagle

Sharon Drappeau

Michael Rouse

David Arrow

Mabel (Judy) Honornichle

Glen Drapeau

COMMENTS

RESPONSES

100-1-2007-0-11AM Pipestone National Monument 1605384#095 No 075 P 11 P-31

Meeting Notes, May 14, 2007 @Ft. Randall Casino
Participant list attached.

During introductions someone said we should also be consulting with the Canadian Bands.

Faith Spotted Eagle read a prepared statement from the Cultural Committee. The statement is not from the tribe as a whole. Others with different opinions may voice them.

Darryl Drapeau: More land should be acquired if it has Pipestone on it.

Wyatt Thomas: Add more property if it contains Pipestone. I am here to support the Yankton, the keepers of the quarries. This process is important but it will take time. Wyatt will report back to his tribal chair about this meeting but had to leave at about 3:30.

Faith Spotted Eagle: We (the Yankton) will need to get the approval of the General Council on official comments.

Evelyn Blackmoon: The elected committee has the authority. Major issues like this need an emergency meeting of the General Committee. I would like to call for a GC meeting on this issue.

Vince Two Eagles: Be careful in dealing with the government, they have lied many times in the past. We were forced to sign treaties. I don't think we should submit comments officially from the tribe. Where do they (government) get the right to take this property and do what they want with it?

Faith Spotted Eagle: We request 2 weeks additional time to provide comments; May 29.

G. Drapeau: I am speaking personally of my own opinions. I cannot attend a GC meeting this week.
When the rights to the Pipestone quarries were relinquished, there were only 26 signatures on it. That could not have been the result of a General Committee decision. As keepers, we had no right to sell it as it belonged to all the tribes. We would have had to have permission from them as well.
The Sundance does not belong at Pipestone. I would like to see the Visitor Center moved away from the quarries like Alternative 1 shows. I want visitors to stay away from the quarries and women too when they are in their moon.
(History) Someone from the tribe would watch over the quarries and people outside of the seven council fires would come to ask for stone. The Blanktowan would have

Responses to the Pipestone Tribal meeting

1. The Monument is required to comply with the American Indian Religious Freedom Act (the Act) as amended (Public Law 95-341, 42 U.S.C. 1996 and 1996a). The Act protects and preserves for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonies and traditional rites. As such, Sun Dances will be permitted within the Monument grounds though issuance of a Special Use Permit. The Monument encourages open dialog between Sun Dance organizers and concerned tribes and citizens to resolve this issue.

RESPONSES

COMMENTS

1.

ceremonies and prayers to decide if they should give them stone. If a decision was made to give them the stone, the keepers would lay it on the ground in front of them and tell them of the significance of the stone and how to treat it; they would explain the responsibility of having the stone. If they took the stone, they would take the responsibility for it.

We were entrusted with the quarries. The government knew if they got us out of the quarries, the entire nation would be conquered. And it was. If we can get the quarries back, our whole nation can be reunited.

To the other tribal reps here—tell your councils to submit a resolution that states the Yankton never had the right to sell the quarries.

Get the Sundance out of the Pipestone quarry area.

Frank Sanchez: Does the National Park Service honor treaties? What is their trust responsibility as far as the head of the park service?

There is a lot of misinterpretation about treaties and us as a people. Our tribe has split many times. We have had to struggle and fight in court for our rights and what we believe in. The agreements/treaties were illegal and we are still in court. The allotment process was illegal. In 1858 they enacted the allotment process here and shouldn't have done that. They justified it by eminent domain. We are forced to react to these illegalities. The National Park Service should put their resources into addressing these larger issues. We need more time to comment. We should request a congressional hearing on the quarries. We used the entire nation to address these questions.

Chris Mazo (Upper Sioux but speaking personally): Pipestone is the most sacred site in North America. AIRFA provides us with access to sacred sites but what right does the government have to tell us what we can do at those sites?

Dennis Gill: I am concerned about the quality of the stone. The stone is brittle. Now you need to dig deep to get it. The stone is only for pipes. The issue is not just with the Yankton. The Yankton are the keepers of that land. The quarries are the center of the Lakota, Nakota, Dakota nation.

Pam Halvorson, speaking for Lower Sioux tribal government: Request 4 weeks additional time for comment, until June 11.

2.

Izzy Zephiar: I disagree with the Sundance at Pipestone. The Yankton need to be involved with the quarries. First we need to get rid of drugs and alcohol so we can heal. The prophecy of the resurgence of the red nation is up to us to fulfill.

D. Derosier speaking for the Sisseton-Wapeton government: The Yankton are the keepers of the quarries. I will report on this meeting to my council.

Vine Marks: We need more time to comment. We need to speak as *ras oysa*.

2. The Monument is required to comply with the American Indian Religious Freedom Act (the Act) as amended (Public Law 95-341, 42 U.S.C. 1996 and 1996a). The Act protects and preserves for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonies and traditional rites. As such, Sun Dances will be permitted within the Monument grounds though issuance of a Special Use Permit. The Monument encourages open dialog between Sun Dance organizers and concerned tribes and citizens to resolve this issue.

1.

COMMENTS

RESPONSES

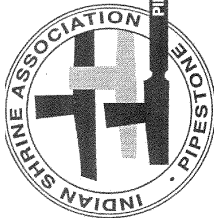
Jun 1, 2007 9:12AM MAY 2007 4:22 PM	Pipestone National Monument 100 E. Lincoln, Minn	16053644043	Ms. 0731 P 13 P. 13
Sign-Sheet for Pipestone Tribal Meeting / Consultation May 14, 2007.			
Name	Tribe	Phone #	E-mail
1. Mike Ackland		491-1539	17 Snake Sign
2. John Rouse		481-0477	
3. M. Judy Horvath		384-4201	
4. Stephen		487-7031	sharon_d920
5. Kevin Karas		491-1605	
6. Maria Jurek		491-4784	mjoseph22-26
7. Allen Hale		491-3383	notmail
8. Margaret Zepher			
9. Phil the Eagle			
10. Chris McIsaac		320-564-4348(h)	
11. Upper Sioux Community		320-884-0806 (cell)	
12. Francis Benne	Thahtowas Opta	605-497-4602	N/A
13. Daniel Dugan			
14. Eugene Blackman			
15. FISH			
16. Brent Dutton Jr.			
17. G. Wagner	Pipestone NM		
18. Wayne Dutton			
19. Steve LaRoe			
20. Dennis Gill			
21. David Amundson			
22. Diane Dutton			
23. 402-857-2772			ogatajmaini@
24. 507-825-5444			pebble.com
25. 605-268-0211			PIPESTONE
26. 605-6157-4133			PAINTHIMSELF.PEEL
27. 605-698-4972			jo yutton-61
28. 605-698-4972			dyanderson@yahoo.co

RESPONSES

COMMENTS

  21. Frank L. Sanchez 22. Frank Parks - SWO - 23. Allen Mesa 24. Am Hakeasa HPA LSTC	
--	--

COMMENTS



P.O. Box 727 • Pipestone, Minnesota 56164
507-825-5463 Fax: 507-825-2903
888-209-0418

www.authenticpipestone.com

May 5, 2007

Superintendent
National Park Service
Pipestone National Monument
36 Reservation Ave.
Pipestone, MN 56164

Dear Supt. LaRock:

Thank you for reviewing the Draft General Management Plan (GMP) at the last meeting of the board of Pipestone Indian Shrine Association (PISA). As a cooperating association of the park service serving Pipestone National Monument, PISA, of course, has a keen interest in all things related to the Monument. We thank you for making copies of the draft GMP available to board members and for taking your personal time to go over the plan alternatives and answer questions at our board meeting. We were glad that we were able to comment during the early stages of the draft process and are appreciative of the opportunity to comment at this juncture.

The board decided that members might make their own comments individually, but the board would also present a comment letter representing the view of PISA as a whole.

The board generally agrees with Alternative Three, the park service's preferred alternative. The board members are very much opposed to Alternative One.

1. While agreeing with Alternative Three, PISA urges that the park service actually acquire the superintendent's house. The house is integral to the Pipestone Indian School and the association believes its preservation should be ensured and the history of the Indian School interpreted for future generations.

PISA also believes that the wildlife area adjacent to the Monument grounds on the northwest should be acquired by the park service and added to the Monument. The inclusion of this land, as well as land on the northeast edge of the Monument, is logical and appropriate.

RESPONSES

Responses to the Pipestone Indian Shrine

1. In the Memorandum of Agreement (MOA) with the Minnesota State Historic Preservation Officer (SHPO) detailing mitigation measures the National Park Service will undertake in removing the Pipestone Visitor Center, the National Park Service will provide technical assistance and will commit to search for preservation funding for the stabilization and restoration of the Superintendent's house. This may include-at some point in the future, should other options prove unsuccessful-the National Park Service assuming ownership of the house through a minor boundary adjustment, legislation, donation, or any other practical vehicle. One of the options the National Park Service will pursue is stabilization and preservation funding through the Centennial Challenge Program, with the premise that matching funds would come from the State of Minnesota and local sources, and in-kind assistance would come from the college. Future uses of the Superintendent's house could be as an interpretive center telling the story of the Indian Schools using the Pipestone Indian School as an example, or to house office space for tribal uses. The owners of the Superintendent's house, Minnesota West Community and Technical College, will be invited to be signatory to the MOA, and the MOA will be included as an appendix in the final General Management Plan.

RESPONSES

COMMENTS

Pipestone National Monument
Page Two

The association would also recommend that a trail system on the perimeter of the park or north of the quarry line be developed. This would greatly add to park enjoyment and provide additional opportunity for interpretation and education. In that same regard, we would urge inclusion of a drive-off for interpretation of the prairie area, on the north side of the park.

PISA also believes that the two houses along Reservation Ave. should be removed. These interrupt the landscape and are inappropriate as well as obtrusive.

The association believes that the Sun Dance and other religious activities of Native groups should be accommodated as much as possible. The board recommends that the park service closely monitor the Sun Dance activity effects on park resources and work with groups to keep environmental detriments to a minimum.

PISA very much supports rehabilitating the Visitor Center and would like to see more space and interpretation available to enhance visitor education and enjoyment.

Sincerely,



Mike Morgan
Executive Director
Pipestone Indian Shrine Association

COMMENTS

RESPONSES

May 9, 2007

Supt Jim LaRock
Pipestone National Monument
Pipestone, MN
56164

Dear Supt. LaRock:

I am pleased to submit a comment letter representing the collective view of Friends of Pipestone National Monument. Again our thanks for the time you have spent with the group during this process and for your presentation on the GMP. The Friends board members have reviewed the plan and may be making personal comments beyond this letter from the group as a whole.

The consensus of board members is that we support Alternative Three, the preferred alternative, albeit with some suggestions and refinements.

One of these is that we think the park service should actually acquire the superintendent's house. The house is about all that is left of the Pipestone Indian School. The Friends group feels the house needs to be saved and be developed as the focal point for interpretation of the history of the school.

The Friends would also like the park service to consider removal of the two houses near the entrance to the park. They mar the landscape and are not appropriate to the park experience.

Our group also believes that the park service should acquire additional land. This would include the land immediately to the northeast and the Wildlife Management area to the northwest. This would be natural extension of the park to incorporate resources proper to National Park Service stewardship.

The acquisition of this land would also help make possible a trail system which the group feels is missing and not mentioned in Alternative 3. The Friends think a trail system, with interpretation, could be added if land is acquired to the northeast. The trail could be extended to pretty much encompass the perimeter of the park. This would greatly add to visitor education and enjoyment.

We think it important that the prairie continue to receive attention as an important park resource. A trail system would aid in education and interpretation of the prairie. Another big aid would be a drive off interpretation area on the north side of the park. We hope such a drive-off will be part of any management alternative finally selected.

The group concurs in moving the maintenance function off-site. We would like to see the Visitor Center rehabilitated and/or enlarged to provide more exhibits and interpretation as that, too, would provide greater visitor education and enjoyment.

Responses to the Friends of Pipestone National Monument

1. 15.1

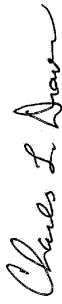
In the Memorandum of Agreement (MOA) with the Minnesota State Historic Preservation Officer (SHPO) detailing mitigation measures the National Park Service will undertake in removing the Pipestone Visitor Center, the National Park Service will provide technical assistance and will commit to search for preservation funding for the stabilization and restoration of the Superintendent's house. This may include-at some point in the future, should other options prove unsuccessful-the National Park Service assuming ownership of the house through a minor boundary adjustment, legislation, donation, or any other practical vehicle. One of the options the National Park Service will pursue is stabilization and preservation funding through the Centennial Challenge Program, with the premise that matching funds would come from the State of Minnesota and local sources, and in-kind assistance would come from the college. Future uses of the Superintendent's house could be as an interpretive center telling the story of the Indian Schools using the Pipestone Indian School as an example, or to house office space for tribal uses. The owners of the Superintendent's house, Minnesota West Community and Technical College, will be invited to be signatory to the MOA, and the MOA will be included as an appendix in the final General Management Plan.

RESPONSES

COMMENTS

The Friends group is very appreciative of the work of the Park Service, you and your staff in behalf of Pipestone National Monument. Thank you for the opportunity to work with you and be part of management draft plan process. We look forward to many years of partnership with the Park Service for the betterment of Pipestone National Monument.

Sincerely,



Chuck Draper
Interim Chair
Friends of Pipestone National Monument

COMMENTS

RESPONSES

M James La Roch, Sust
 P.M.M
 Pipestone, MN 56164
 FEB 3 2007
 Pipestone MN 56164
 Feb 6 2007

Dear Mr. James La Roch
 Enclosed is our quarry permit application
 we filled them out, our reservation number
 never changed in the same day past.
 If any disagreement please let me know
 also receive your big Thank you!
 book, we are reading it
 and if you wish to consult
 with any one of us, just
 let us know.
 Shirley Ecks

As I Shirley Ecks, do not like all these
 Indian thing in and back where we quarry
 I was years + years ago, I am done in bed
 in the Black Hills, I am done by our ancestors.

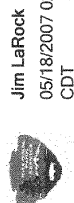
Response to Shirley Ecks

1. The Monument is required to comply with the American Indian Religious Freedom Act (the Act) as amended (Public Law 95-341, 42 U.S.C. 1996 and 1996a). The Act protects and preserves for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonies and traditional rites. As such, Sun Dances will be permitted within the Monument grounds though issuance of a Special Use Permit. The Monument encourages open dialog between Sun Dance organizers and concerned tribes and citizens to resolve this issue.

COMMENTS

RESPONSES

COPY



Jim LaRock
05/18/2007 02:08 PM
CDT
To: Sheryl Baerenwald/PIPE/NPS@NPS
cc:
Subject: Fw: Review Comments, Pipestone Draft GMP

These should be treated as any comments are. Copies to Sandra and Craig and one for our files. Thanks.

Jim LaRock
National Park Service
Superintendent, Pipestone National Monument
36 Reservation Avenue
Pipestone, MN 56164
(507) 825-5464
----- Forwarded by Jim LaRock/PIPE/NPS on 05/18/2007 02:07 PM -----

John Sowl
05/17/2007 04:44 PM
CDT
To: Jim LaRock/PIPE/NPS@NPS
cc:
Subject: Review Comments, Pipestone Draft GMP

Hi Jim,

Thank you for the opportunity to review and comment on your draft GMP. My comments are in attached below. Please don't hesitate to contact me with any questions you might have regarding these comments.

Best wishes on the final outcome of your GMP!

John
402.661.1872



Draft GMP-PA; PIPESTONE Review Comments.JHS.doc

COMMENTS

**Review Comments on the Draft
General Management Plan/Environmental Impact Statement:
Pipestone National Monument**

15 May 2007

General Comments:

A review of the draft GMP and its alternatives left me with a significant number of questions regarding why certain decisions were made to develop the alternatives as presented, aside from the No Action alternative. While not privy to the discussions and meeting comments associated with the development of this draft GMP over the years and intending *no disrespect* toward the monument staff, planning team, or their product, my collective comments and thoughts in this regard are presented below for your consideration and action, along with the possibility of a fourth alternative that consolidates many of the stated concerns while recognizing other opportunities. Although I disagree with its conclusions as presented within the draft GMP, I commend the planning team for working hard while under constraints to make every effort to conserve the monument's resources.

1. Pipestone National Monument has operated under a 1966-vintage Master Plan, and other minor adjustments, since its inception. Because of this, I was quite disappointed to read within the draft GMP – its *first* GMP – that the monument's preferred alternative was essentially to remain, by and large, mostly the same as it has been over all these years with only relatively minor adjustments to its facilities, land resources, and to the original 41 year-old Mission 66 centric orientation of the entire operation. Why, in practicality, should more financial resources be sunk into an out-of-date, debilitated, and physically inadequate visitor facility set in the very middle of the monument's key resource feature to the disruption of the monument's natural and cultural landscapes and, to American Indians, the overall sacredness of the site? With the NPS Centennial celebration looming in 2016, this GMP is probably the last big opportunity before that date to think outside of the box and boldly position the monument for the Service's new century. In the end, it's just as easy to select one scenario over another for the final preferred alternative.

The Pipestone situation is directly analogous to that of Homestead National Monument in 1999. They too were developing their GMP with thoughts of sticking with their current, inadequate Mission 66 visitor center, *etc.*, which, like Pipestone's, was located within the 100-year floodplain. In the end, however, they decided to rethink the situation and now are poised to open a new, improved visitor center outside of the hazard zone.

My opinion is based on the draft GMP's description of the existing visitor center as having so many inadequacies for meeting the monument's needs, while being in need of so many repairs, that it is most curious why the planning team has not opted to dramatically rethink the *status quo*, seize this moment in time, and put forward a proposal to construct a new facility to *fully* address the shortcomings, not simply to rework the current situation. In this case, this could translate into a new up-to-date, energy-efficient visitor center designed to fully accommodate the monument's needs while consolidating a number of now disparate functions. These variations in thinking are enough to form an **Alternative 4**, the main features of which can be summarized as follows:

1.

RESPONSES

Responses to John Sowl

1. The suggested 4th alternative is very similar to the Draft Alternative 1. The notable exceptions are retaining the current Reservation Avenue in its entirety, upgrading of all trails within the Monument to Americans with Disabilities Act (ADA) standards, and locating of a new visitor center at the southeastern corner of the Monument.

Location of the new visitor center will be analyzed and determined through additional study and appropriate environmental compliance. The proposed site and other potential locations have not been formally evaluated for impacts to resources; the selection of a site is outside the scope of this document.

The retention of Reservation Avenue is not warranted under the proposed 4th alternative as the parking for quarriers is provided for at the southern terminus of the south quarry trail. The trail will also be widened to accommodate a small maintenance vehicle to assist in the movement of tools and quarried stone at the request of individual quarriers. The widening of the trail will also put the south quarry trail in compliance with ADA standards for trails. Other legs of the trail do not afford an opportunity to be ADA compliant due to the steepness of the escarpments and their location near sensitive plant communities and ethnographic/archeological resources. Access to sites and vistas will be afforded to handicapped visitors in other ways while retaining the historic qualities of the Circle Trail.

RESPONSES

COMMENTS

Potential Alternative 4

Visitor Services/Administrative Zone:

Same as under Alternative 3: Administrative Zone and Visitor Center Zone EXCEPT:

- Remove visitor services and administration from the center of the primary resources to 1) help preserve the sacredness of the area, as envisioned by American Indians, and 2) to help preserve and enhance the natural and cultural landscape of the quarry area and its setting within the monument.
- Two zones consolidated.
- Develop a new, state-of-the-art energy-efficient visitor center to address congestion at the monument and one that consolidates visitor services, museum and interpretation; cooperative association; pipestone carving demonstrations; collections, archives and curation; administrative functions and offices (including law enforcement), public restrooms and outside picnic area.
- Locate the new visitor center to the southeastern corner of the monument off the entrance road to replace the two houses near the entrance and constructed on a berm above the 500-year floodplain, but careful not to adversely impact any threatened, endangered, or otherwise sensitive species or environmental features.
- Remove the existing visitor center but keep its entrance road. Redesign the present parking area to reduce its "footprint," if possible, for greater efficiency and possibly terminate in a smaller cul-de-sac end design.
- Relocate maintenance facility to location near Minnesota West Community and Technical College.
- Remove public restrooms and parking lot from the Three Maidens area and incorporate into new visitor center.
- A new public prairie overlook would be developed along the western boundary of the monument.
- All trails through the monument would be upgraded to be fully ADA compliant.
- A new ADA-compliant trail segment would be established extending west from this new visitor center/administration complex, but careful not to adversely impact any threatened, endangered, or otherwise sensitive species or environmental features, to the nearby south quarry line where a demonstration quarry would be developed both to interpret the quarrying process for visitors and to teach new quarries the basic quarrying techniques.

Prairie Preservation Zone:

Same as in Alternative 3: Preferred Alternative, BUT

- Rehabilitate the old visitor center area and redesigned parking area to native prairie.
- Rehabilitate the public restroom and parking area near the Three Maidens to native prairie.
- Relocate trail bridge above the falls and across the channelized portion of Pipestone Creek
- or remove the bridge altogether and redesign the southern portion of the trail to create a new loop segment between the below the falls and the old visitor center area and south along the quarry line.
- The 18-acre area of former community college land bordering on the northeastern corner of the monument would be added to the monument and managed as Prairie Preservation Zone.

RESPONSES

COMMENTS

- Quarry Zone:
Same as in Alternative 3: Preferred Alternative.
- Ceremonial Use Zone:
Same as in Alternative 3: Preferred Alternative.
- Three Maidens Zone:
Mostly the same as in Alternative 3: Preferred Alternative EXCEPT
- Public restrooms, picnic area and parking would be removed to the new visitor center locale on the site of the current two NPS houses.
- Natural Resources
Same as in Alternative 3: Preferred Alternative.
- Cultural Resources
Same as in Alternative 3: Preferred Alternative.
- Boundary Adjustments
- The monument would seek to acquire the 18-acre area of former community college land bordering on the northeastern corner of the monument to preserve the archeological evidence of a pipestone work area. Once incorporated into the monument, the area would be managed as Prairie Preservation Zone. This can be accomplished without a prior Boundary Study since the 18 acres represent less than 10% of the monument's total area.
 - A Boundary Study would be requested to examine the feasibility and suitability of expanding the monument's boundaries to include 1) the adjacent Pipestone Wildlife Management Area from the US Fish and Wildlife Service, and 2) the former Pipestone Indian School superintendent's house located on the Metropolitan West Community and Technical College campus.

Please add a map showing the 100 and 500-year floodplain boundaries to the GMP.

As the artificial Lake Hiawatha on Pipestone Creek probably does not provide habitat benefits for the Topeka shiner, and may actually contribute to that species stress within the monument, please consider the removal of the impoundment and lake for the long term benefit of this species.

Specific Comments:

Alternative 1

The nicest aspect of this alternative is that it removes the monument's administrative and most visitor service facilities from within the monument while restoring native vegetation in its place. Therefore, the monument's natural resources are maximized to concentrate on its purpose, the pipestone quarries and their environment. However my experience, for a variety of reasons, suggests a significant benefit from retaining some of these facilities – particularly visitor centers – relatively near to the resource(s) being interpreted, but not overwhelming them or assuming primacy.

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Visitor Services Zone:

p.59: The proposed new entrance area on the east side of monument land would continue to be within the 100-year floodplain resulting in a potential risk to NPS structures and, to a small extent, to park staff. Therefore, this does not appear to be a good long-term solution

Retention of the public restrooms near the Three Maidens appears to represent a certain disrespect (although unintentional) toward these sacred rocks and toward American Indian people who perform rituals near the rocks as well as a potential disruption of the sacred atmosphere from visitors. If the restrooms are retained, that action would appear to call into question the true sacredness of the site to non-Indians. Therefore, consultation with the affected American Indian community to seek their clearance for this design feature is recommended.

The concept of creating a public prairie overlook on the west side of the monument is excellent. It should help visitors better understand the physical context of the pipestone quarries within an admittedly small remnant of their natural environment.

Ceremonial Use Zone:

p.63, para.2: Would reseedling of the Sun Dance sight take place every year prior to the dance? If so, it does not make financial or resource sense to reseed the area every year only to have it severely impacted by the ceremonial activities every year. Even though the area's carrying capacity would be determined first, what are the political ramifications if carrying capacity dictates that only a handful of people can participate out of the many who desire to participate? It does not seem possible that even this stated policy on carrying capacity can avoid long term environmental degradation of the site. Please consider that if these activities do result in long term resource degradation to the site, can the ceremonial activities be moved to a less impact-prone area? Should Sun Dance activities continue to be allowed on the monument, as it's not part of the monument's legislated purpose?

Alternative 2Administrative Zone:

p. 67, para.1: Please consider that installation of a new maintenance facility within the newly acquired land along Hiawatha Avenue to the south of the Minnesota West Community and Technical College could adversely impact lithic scatters and the pipestone work site – or other potential pipestone-related cultural resources – within this parcel. It also could establish a visual intrusion between the newly acquired Pipestone Indian School's superintendent's house and the monument's natural and, potentially, cultural landscapes. In addition, this area is apparently within the 100-year floodplain or has the potential to flood. In light of these reasons, please reconsider the placement of a new maintenance facility in this locale.

Visitor Services Zone:

2. The Monument is required to comply with the American Indian Religious Freedom Act (the Act) as amended (Public Law 95-341, 42 U.S.C. 1996 and 1996a). The Act protects and preserves for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites. As such, Sun Dances will be permitted within the Monument grounds though issuance of a Special Use Permit. The Monument encourages open dialog between Sun Dance organizers and concerned tribes and citizens to resolve this issue.

COMMENTS

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p.67, para.1: Please describe exactly what measures would be used to help protect the redeveloped visitor center from flooding?

p.67, para.2: Please make appropriate analysis within the “Impacts” section (unless I’ve missed it) that the stated adjustments to the visitor center area would probably enlarge the development “footprint” within this zone which could adversely affect both natural and cultural resources as well as their landscapes within the monument.

Prairie Preservation Zone:

p. 67: Although the acquisition of the USFWS/MDNR land adjacent to the monument would undoubtedly make a fine addition to the monument’s Prairie Preservation Zone and could benefit the natural and possibly cultural landscapes of the monument, the draft GMP does not make a strong or convincing case that such an acquisition is necessary. After all, these additional 100 or so acres are already protected by federal ownership with additional state management, albeit to support hunting and not strictly to preserve prairie. In addition, it is noted that additional pipestone deposits reside within these acres (see comment below under “Quarry Zone”). Please consider an alternate arrangement whereby the NPS has first write of refusal if the USFWS and MDNR do not want to retain these acres. Also, please consider requesting a Boundary Study to determine the feasibility and suitability of such an addition to the monument.

Quarry Zone:

p.68, para.2: Under this alternative the monument acquires the USFWS/MDNR land to the north and northwest of the current monument boundary. If the purpose for acquiring this land is to provide additional quarry resources for future American Indian quarriers (as the pipestone deposit extends through this area and connects to the monument’s deposit), it would make sense to *first* make a formal determination that the pipestone in this “new” deposit is of acceptable quality to be quarried *before* undergoing a boundary adjustment and acquiring the land.

RESOURCE PROTECTION: Cultural Resources:

p.72, left column, para.3: Implementation of the action described the first sentence would undoubtedly provide an unimpeded view of the Winnewissa Falls. However, the proposed relocation of the Winnewissa Falls bridge to a site below the falls would locate the bridge within a braided reach of Pipestone Creek. Assuming that the park wants to retain the natural morphology of the creek through the monument, a new bridge at this location would probably have to be exceptionally wide to accommodate the natural shifting of the braided channel over time while allowing for public transit. This fact could possibly render such a bridge impractical, uneconomical, an adverse impact to natural (and possibly cultural) resources by virtue of a larger developmental “footprint,” and a visual intrusion on the natural/cultural landscape. Please consider relocating the Winnewissa Falls bridge to a location upstream from the falls to provide a narrower crossing in conjunction with a minor realignment of the existing trail – together with appropriate adjustments to the trail’s approach slopes to meet ADA requirements – to incorporate the bridge. Adoption of this suggestion could not only result in a potentially smaller, less expensive bridge than below the falls that takes advantage of the channelized portion of Pipestone Creek, but should help the park avoid the yearly replacement of the bridge and should help to reduce or avoid any high water-related damages.

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In addition, please consider that another option would be to reconsider the need for a bridge altogether. Perhaps the major southern portion of the monument's trail system could be made into a loop with a new segment sited to parallel Pipestone Creek on its south side. This would connect the trail near the Winnewissa Falls with the visitor center OR back south along the South Quarry Line.

p.72, left column, para.4: Wouldn't the action described in this paragraph, if implemented, significantly modify the original Mission 66 structure to the point where it loses a significant amount of its integrity? The draft GMP states that the 1970 addition was in keeping with the Mission 66 concept for visitor facilities, however this proposed modification appears to go beyond even that. Please address this under the "Impacts" section.

p.72, right column, para.1: First, the draft GMP paints a picture of some real flooding potential for the monument, particularly up front in the plan and associated with the No Action alternative. Now in this paragraph, the draft GMP states that flooding would be an "...unlikely but real possibility..." seemingly down-playing the risk. Yet the GMP states (p. 154) "Foreseeable future actions that could occur throughout the region" that could adversely affect natural resources and cultural landscapes include continued subdivision and proposed commercial developments. With these changes, as well as the possibility of more frequent and intense storm events as a result of future climatic changes, the hydrologic characteristics of the Pipestone Creek watershed will probably also change to increase runoff from developed surfaces, resulting in greater flooding potential for the creek and, by extension, the monument. This, in turn, would increase the potential for significant damage to the monument's visitor center and its collections and archives. Please adjust the draft GMP to remove these inconsistencies.

This paragraph also states that while the curation and storage areas would be raised, presumably above the 100 and 500-year floodplain levels, the collections and archives would, nevertheless, continue to be protected by the actions recommended in the (existing?) national monument's emergency operations plan. So if this plan would continue to protect these resources, what's the point and extraordinary benefits from paying to elevate the structure now? In addition, elevating the structure as described will also raise the prominence and visibility of development within the monument's natural and cultural landscapes, thus possibly detracting from these resources. Please adjust the draft GMP to take these considerations into account.

Alternative 3: PREFERRED ALTERNATIVE

Administrative Zone:

p.74, Management Zones, Administrative Zone, para.1 and 2: Please consolidate the verbiage in these two paragraphs into one as they both are saying about the same thing.

p. 74, para.2: The draft GMP states that the second house within this zone could also be used for collections storage or additional office space. Yet this house, as well as the first house within this zone, are probably situated within the floodplain. Therefore, this sight and these facilities, as they are now, would provide no additional safety for personnel and collections from potential flooding. Therefore, please reconsider this option.

Visitor Services Zone:

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Why did the planning team decide to retain the Mission 66-era visitor center within the Preferred Alternative? The GMP states that the present facility has a list of structural and environmental health and safety problems (e.g., leaks, catlinite dust) together with design short-comings (overall cramped and dated with inadequate visitor “processing” or curation space, etc.) for accommodating the current level of activities. Most troubling of all, the building is situated within the 100-year floodplain, thus potentially endangering the monument’s collections and archives and, to a reduced extent, the staff, demonstrators and public during flood events. The GMP states (p. 154) “Foreseeable future actions that could occur throughout the region” that could adversely affect natural resources and cultural landscapes include continued subdivision and proposed commercial developments. With these changes, as well as the possibility of more frequent and intense storm events as a result of future climatic changes, the hydrologic characteristics of the Pipestone Creek watershed will probably also change to increase runoff from developed surfaces, resulting in greater flooding potential for the creek and, by extension, the monument. This, in turn, would increase the potential for significant damage to the monument’s visitor center and its collections and archives.

After reading the proposal for the Administrative Zone and particularly for the visitor center, one strongly comes away with the question “If (1) the visitor center’s fabric needs so much maintenance attention, (2) its design is inadequate to meet today’s – and the foreseeable future’s – visitor and operational needs, (3) it’s situated within both the 100 and 500-year floodplains of the site, and (4) it’s architecturally significant as a small park example of Mission 66 architecture but removing it from the monument would result in no adverse effect, then why doesn’t the monument simply tear down the present structure and build a new designed-to-suit visitor and administration facility away from the primary resources and out of the flood hazard zone, instead of throwing more money into the old, inadequate structure?” According to the 106 Compliance analysis presented in the draft GMP, the present visitor center is only significant and on the National Register as an example of Mission 66-style small park visitor facilities. Since this structure has no significance to the monument’s legislated purpose, the analysis states that removal of the structure, after undergoing mitigation through documenting and recording the structure, would result in only a moderate adverse effect on the National Register-listed structure (p. 170, Section 106 Summary). Therefore, interpretation of this analysis is that the removal of the current visitor center, while sorely regretted by some, would not be an insurmountable achievement for the overall improvement of the monument’s visitor services function together with its collections and archives storage and curation, particularly in light of the facility’s many short-comings.

Prairie Preservation Zone:

p. 75, para.4: Regarding a new bridge below Winnemissa Falls, see comment under Alternative 2, RESOURCE PROTECTION: Cultural Resources above.

Three Maidens Zone:

Retention of the public parking lot and restrooms near the Three Maidens appears to represent a certain disrespect (although unintentional) toward these sacred rocks and toward American Indian people who perform rituals near the rocks as well as a potential disruption of the sacred atmosphere from visitors. If the parking lot and restrooms are retained, that action would appear to call into question the true sacredness of the site to non-Indians. The draft GMP states (next paragraph) that the Three Maidens area “...should be a place of quiet contemplation and

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respect...and visitors would be asked to help preserve that atmosphere.” Keeping a parking lot and restrooms near the rocks for visitor use does not appear to be consistent with the sanctity of the Three Maidens area. Therefore, consultation with the affected American Indian community to seek their clearance for this design feature is recommended.

RESOURCE PROTECTION: Cultural Resources:

p.80, left column, para.2: Regarding a new bridge below Winnewissa Falls, see comment under Alternative 3, Prairie Preservation Zone above.

p.80, left column, para.3: Regarding renovation of the existing visitor center, see comment under Alternative 2, RESOURCE PROTECTION: Cultural Resources, p. 72, left column, para.4 and under Alternative 3; Visitor Services Zone above.

p.80, left column, para.5: The draft GMP’s proposal to acquire the Pipestone Indian School’s superintendent’s house does not appear to directly support or fulfill the specific legislated purpose identified within the establishing legislation of the monument and, therefore, should probably not be considered. However, the Indian school does have a long and close historical relationship with the monument, even though it represents a different, but extremely important, story, which is of the forced assimilation and systematic destruction of American Indian culture through the mechanism of Indian schools. The question seems to be if this story is or can be better represented at another NPS unit within the system or at a location outside of the NPS system. Please consider requesting a Boundary Study to determine the feasibility and suitability of this potential addition to the monument.

RESOURCE PROTECTION: Natural Resources:

p.80, para.4: Implementation of the action described the first sentence would undoubtedly provide an unimpeded view of the Winnewissa Falls. However, the proposed relocation of the Winnewissa Falls bridge to a site below the falls would locate the bridge within a braided reach of Pipestone Creek. Assuming that the park wants to retain the natural morphology of the creek through the monument, a new bridge at this location would probably have to be exceptionally wide to accommodate the natural shifting of the braided channel over time while allowing for public transit. This fact could possibly render such a bridge impractical, uneconomical, an adverse impact to natural (and possibly cultural) resources by virtue of a larger developmental “footprint,” and a visual intrusion on the natural/cultural landscape. Please consider relocating the Winnewissa Falls bridge to a location upstream from the falls to provide a narrower crossing in conjunction with a minor realignment of the existing trail – together with appropriate adjustments to the trail’s approach slopes to meet ADA requirements – to incorporate the bridge. Adoption of this suggestion could not only result in a potentially smaller, less expensive bridge than below the falls that takes advantage of the channelized portion of Pipestone Creek, but should help the park avoid the yearly replacement of the bridge and should help to reduce or avoid any high water-related damages.

Please consider that another option would be to reconsider the need for a bridge altogether and allow visitors to view the falls from one of the downstream trail alignments. Perhaps the major southern portion of the monument’s trail system could be made into a loop with a new segment

3. In the Memorandum of Agreement (MOA) with the Minnesota State Historic Preservation Officer (SHPO) detailing mitigation measures the National Park Service will undertake in removing the Pipestone Visitor Center, the National Park Service will provide technical assistance and will commit to search for preservation funding for the stabilization and restoration of the Superintendent’s house. This may include-at some point in the future, should other options prove unsuccessful-the National Park Service assuming ownership of the house through a minor boundary adjustment, legislation, donation, or any other practical vehicle. One of the options the National Park Service will pursue is stabilization and preservation funding through the Centennial Challenge Program, with the premise that matching funds would come from the State of Minnesota and local sources, and in-kind assistance would come from the college. Future uses of the Superintendent’s house could be as an interpretive center telling the story of the Indian Schools using the Pipestone Indian School as an example, or to house office space for tribal uses. The owners of the Superintendent’s house, Minnesota West Community and Technical College, will be invited to be signatory to the MOA, and the MOA will be included as an appendix in the final General Management Plan.

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sited to parallel Pipestone Creek on its south side. This would connect the trail near the Winnewissa Falls with the visitor center OR back south along the South Quarry Line.

AFFECTED ENVIRONMENT:

p. 123, Floodplains: The GMP states that the existing visitor center/headquarters and maintenance facility are situated within the 100-year floodplain, with the employee housing located outside of the 500-year floodplain, yet prone to some flooding. The GMP would greatly benefit from the addition of a map showing both monument elevations and the boundaries of the 100 and 500-year floodplains in the area of the monument.

p. 125, right column, para. 3, line 2: Please ensure that the species name for the Topeka shiner is correct.

p. 159 and elsewhere in this chapter: The GMP states that the monument has experienced the effects from altered local hydrology over time with a resultant occasional flooding and its related sediment deposits, particularly into Lake Hiawatha. It is also stated that the lake may have approximately two feet of capacity remaining to absorb any additional sedimentation. Consequently, please discuss the possibility and resulting associated impacts if that lake may need to be dredged in the near future or if is removed altogether, since it is a man-made impoundment.

p. 193-194: This chapter does not appear to address the associated impacts to wetlands and floodplains from the proposed installation of a pedestrian bridge somewhere below Winnewissa Falls. Please adjust this section to analyze these impacts.

p. 209-212: See comment for p. 193-194 above. Please adjust this section to analyze these impacts.