



National Park Service
U.S. Department of the Interior

Keweenaw National
Historical Park

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Keweenaw NHP FONSI – Union Building Interpretive Facility

Finding of No Significant Impact (FONSI) Union Building Interpretive Facility Keweenaw National Historical Park

The National Park System preserves outstanding representatives of the best of America's natural, cultural, and recreational resources of national significance. These resources constitute a significant part of the American heritage, its character, and future. Keweenaw National Historical Park was established in 1992 in Houghton County, Michigan. As stated in its enabling legislation (Public Law 102-543), the park has a two-fold purpose: to preserve the nationally significant historical and cultural sites, structures, and districts of a portion of the Keweenaw Peninsula for the education, benefit, and inspiration of present and future generations; and to interpret the historic synergism between the geological, aboriginal, sociological, cultural, technological, and corporate forces that relate the story of copper on the Keweenaw Peninsula.

A Congressionally mandated partnership park, Keweenaw works with officially designated partners (Keweenaw Heritage Sites, or KHS), private property owners and organizations, and other governmental agencies to fulfill its purpose. Although the breadth of this partnership encompasses four counties, the park's two units are located in Houghton County; each is based on a National Historic Landmark district. The Calumet Unit is located within the community of Calumet and has a stronger emphasis in social history, while the Quincy Unit contains key elements of the Quincy Mining Company's industrial operations and several of its neighborhoods of worker housing. The park owns only six structures within these two units, and the majority of property within park boundaries is privately owned.

The Union Building documents that intersection between Calumet's industrial and social stories, and is particularly important in architectural and social history.¹ It is located a few blocks west of park headquarters at the edge of the village. Its development began in 1888 when two fraternal lodges – the Free and Accepted Masons and the Independent Order of Odd Fellows – formed the Union Building Association. The Association's purpose was to fund the construction of a shared lodge hall, which was then built on land owned by C&H. Over time, the partnership's name came to identify the building itself as the Union Building. The building also demonstrates the connection between mining company and community: donating land was an expression of C&H's paternalistic management style, and allowed them a measure of control over how land

¹ US Department of the Interior, National Park Service, Keweenaw National Historical Park, *Union Building Historic Structure Report, Part 1: Developmental History*, 2009.

was being used and how its workforce was spending its leisure time. The three and one-half story masonry structure was completed in 1889, and provided meeting spaces for the Odd Fellows on the second floor and Masons on the third; other fraternal and benevolent groups rented the lodge spaces as well.

The Union Building is listed as a contributing structure in the National Register's Red Jacket Downtown Historic District (1976), and the Calumet National Historic Landmark District (1989). It has also been included in the State of Michigan's Historic Register and in the Village of Calumet Civic and Commercial Historic District.

Recognizing its inherent historical value, and guided by previous development plans, the National Park Service (NPS) purchased the building in 1999 with the intention of preserving it for interpretive purposes. A comprehensive exterior rehabilitation project was completed in 2005. This work included a new roof, repairs to the masonry and cornice, and the rehabilitation of the storefronts. As part of the effort to preserve and interpret the structure, planning is underway to rehabilitate the interior as a permanent interpretive facility and temporary visitor orientation facility.

The Environmental Assessment (EA) was prepared to assist the NPS in planning the development of the Union Building as the first NPS-operated visitor interpretive facility for Keweenaw NHP. The project includes the rehabilitation of the historic structure's interior, including provision for universal access, and the design and installation of interpretive exhibits on the first and second floors.

Keweenaw NHP's General Management Plan and Environmental Impact Statement (GMP/EIS) directs the NPS to provide a traditional park experience within its boundaries.² This experience is being developed, in part, through the acquisition and rehabilitation of significant historic structures like the Union Building. The GMP/EIS also calls for the NPS to establish an interpretive presence in the Calumet Unit. The Union Building was identified as the most suitable facility to meet these goals during two separate planning endeavors: the Park's draft Long Range Interpretive Plan (LRIP) and the Park Facility Plan (PFP).³ The preservation and rehabilitation of this structure as an interpretive and visitor orientation facility is integral to the Park's mission.

The purpose of this project is therefore twofold: the first is to complete the work begun in 2005 and rehabilitate the interior of a significant park-owned historic structure following the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (or, in short, the *Secretary's Standards*). The second purpose is to develop the structure as an interpretive and orientation facility for visitors and residents. This facility will provide information about the park and regional area, and interpret social history through exhibits on the first and second floors, providing a cohesive overview of the community's development and role in the Keweenaw Peninsula's rich, nationally significant copper mining history.

² US Department of the Interior, National Park Service, *Keweenaw National Historical Park, Michigan, Final General Management Plan and Environmental Impact Statement* (Washington, DC: 1998).

³ US Department of the Interior, National Park Service, *Keweenaw National Historical Park Long Range Interpretive Plan*(draft) (2009); US Department of the Interior, National Park Service, *Keweenaw National Historical Park, Park Facility Plan* (2009).

PREFERRED ALTERNATIVE

Alternative 2 – Interior Elevator and Stair

Alternative 2 incorporates a new four-stop elevator and egress stair within the interior of the Union Building. This new construction consolidates secondary spaces in the building's southeast corner. New group toilet facilities on the first floor serve users on the first, second, and third floors. Supplemental new single-occupancy unisex toilets are included on the second and third floors. The second floor toilet facility is located in an existing toilet room. The third floor toilet facility is located in the east end of the south anteroom.

Utilizing the Choosing by Advantages (CBA) process, Alternative 2 was selected as the preferred alternative for rehabilitation during the Union Building architectural Value Analysis (VA) sessions held at park headquarters in July 2008. Alternative 2 incorporates all contemporary use requirements, including an elevator for universal accessibility, an additional stair for safe building egress, and toilet facility needs, all within the building's secondary interior spaces. It was determined that Alternative 1 best maintains the integrity of both the Union Building's exterior envelope and the surrounding cultural landscape. Alternative 1 also best supports a positive visitor experience by integrating intuitive building circulation, convenience to toilet facilities, and optimal use of the building's primary entrances adjacent to the new elevator and stair. Finally, Alternative 2 best optimizes use of the building for after-hour community functions with the lowest projected operational expenses based on a square foot analysis.

OTHER ALTERNATIVES CONSIDERED

In addition to the preferred alternative described above, the environmental assessment also analyzed Alternative 1, a No Action alternative, which would result in a degradation of park values and community preservation and economic revitalization objectives, and was therefore dropped from consideration.

Alternative 3, Exterior Elevator and Stair, proposed construction of an external, adjacent structure that would house the accessible elevator and egress stairway. The VA's CBA process clearly indicated that the introduction of an additional structure would create an incompatible intrusion on the cultural landscape, and the alternative was therefore dismissed from further consideration.

Alternative 4, Interior Elevator and Exterior Stair, proposed construction of an interior elevator in the southeast quadrant and an external, three-story addition to accommodate an egress stair. The visibility of the stair addition within the Village of Calumet Civic and Commercial Historic District would adversely impact the cultural landscape and the integrity of the historic structure. Coupled with the diminished visitor experience resulting from fragmented interior spaces, the VA's CBA process indicated that the Interior Elevator and Exterior Stair alternative would not meet community and park values, and was therefore dismissed from further consideration.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria in the National Environmental Policy Act of 1969 (NEPA), which is guided by the Council on Environmental Quality (CEQ). The CEQ defines the environmentally preferred alternative as “...the alternative that causes the least damage to the biological and physical environment; it also means the

alternative which best protects, preserves, and enhances historic, cultural, and natural resources.” (1981)

Using the CEQ’s interpretations of the Section 101 criteria and the alternatives impact analysis in this document, it was determined that Alternative 2: Interior Elevator and Stair and its accompanying decision to remove the second floor stage platform is the environmentally preferred alternative.

Alternative 2 and the accompanying decision to remove the second floor stage platform would implement the highest level of rehabilitation, restoration, and preservation of all the alternatives. This alternative strikes a balance between available resources, the desire to rehabilitate the building to its period of significance, and provide meaningful interpretation for visitors while minimizing impacts to the historic structure and the surrounding community.

No new information came forward during public scoping or consultation with regulatory agencies or Native American tribes to necessitate the development of any new alternatives, other than those described and evaluated in the Environmental Assessment.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT IMPACT ON THE HUMAN ENVIRONMENT

The impact on twelve significance criteria, defined in 40 CFR §1508.27, were considered in determining the appropriate NEPA path, resulting in the attached Environmental Assessment and this subsequent FONSI.

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

It is important to note that “impact” may be both beneficial and/or adverse, but that impact for the overall good of the program cannot be used to overlook significant bad impacts. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial. Both good and bad impacts were carefully considered by the park’s Interdisciplinary Team (IDT) and the Cultural Resources Management Team (CRMT), which found that there would be no significant impact, either adverse or beneficial, in the preferred alternative.

In answering the twelve significance criteria, the following questions were addressed:

If implemented, would the proposal

A. Have significant impacts on public health or safety?

There would be no significant impact on public health and safety since prescribed treatments would create only minor, and most importantly, temporary effects due to noise intrusion during the construction period.

B. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); and other ecologically significant or critical areas?

The actions taken under the preferred alternative will affect only the Union Building and its associated cultural landscape; the remainder of the contributing features in the Calumet National Historic Landmark District will not be affected by these actions. Impacts will typically be negligible to minor, and, indeed, several will be beneficial to the preservation of cultural resources related to the Union Building and its associated cultural landscape. There will be no significant impacts to natural, cultural, or historic resources.

C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?

The resultant facility, including treatment of the historic resources and interpretive exhibits, does not encompass highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources as defined in NEPA §102(2)(E).

D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?

The impact of Alternative 2 does not have highly uncertain and potentially significant environmental effects, or involve unique or unknown environmental risks. Throughout the IDT assessment phase of this project, team members sought any indication of such effects or risks, and found nothing to indicate the possibility of significant impact.

E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?

There is no element of this alternative that would have the potential of establishing a precedent for future actions or represent a decision in principle about future actions with potentially significant environmental effects. All elements of this alternative have been implemented in other parks throughout the country.

F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?

In examining the subject area and its adjacent properties and interested parties, the Environmental Assessment found no impact from this action that would result in significant cumulative effects when added to other actions in the past, present, or reasonably foreseeable future.

G. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office?

While the project is located entirely within the Calumet Historic Landmark District (1989), the final written consultation from the State Historic Preservation Officer dated April 23, 2010, project number ER-930564, concurs with the NPS CRMT that the undertaking would have **no adverse effect** [36 CFR § 800.5(b)]. The MI-SHPO did, however, attach several conditions that need to be met in order for the NPS to meet its responsibility in complying with 36 CFR § 800.4, "Identification of historic properties," and 36 CFR § 800.5, "Assessment of adverse effects". The bulk of the SHPO's conditions were relative to corrections/omissions in the construction documents, ensuring that corrections be made prior to construction. Others involved documentation to support the use of encaustic tile on the first floor, retention of decorative stenciling on the second floor Introduction Hall, removal of a

door jamb adjacent to the second floor elevator landing, finishes in the third floor kitchen, and ceiling details above the third floor stage. The park concurs with the SHPO's conditions, and submitted the required acceptance letter to SHPO on April 23, 2010. Personal consultation with the Keweenaw Bay Indian Community (KBIC) THPO, indicated that there are no sites of religious or cultural significance in the project area. Consultation with the SHPO and the THPO satisfies compliance with Section 106 of the National Historic Preservation Act (NHPA).

H. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?

While the Natural Heritage Specialist for the Michigan Department of Natural Resources (MI-DNR) cites the presence of the occasional transient, the Michigan Natural Features Inventory (Michigan State University Extension) indicates that there are no known resident fauna or flora listed as Threatened and Endangered (T&E) species that occur in this unit, nor is there any designated Critical Habitat for such species identified in the subject area. Consultation with the Fish and Wildlife Service (FWS), pursuant to Section 7 of the Endangered Species Act of 1973, indicates the potential presence of Gray wolf (*Canis lupus*) and Canada lynx (*Lynx canadensis*), although no suitable habitat is present near the project area. Consultation was accomplished through the FWS web-based consultation tool, and is documented in the administrative record..

I. Violate a federal law, or a state, local, or tribal law or requirement imposed for the protection of the environment?

Treatments prescribed by the preferred alternative are in regular use within other national park areas, and do not violate any federal, state, local, or tribal law for the protection of the environment in the project area.

J. Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898)?

There are no low income or minority populations that would be adversely affected by the implementation of this project.

K. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007)?

The Keweenaw Bay Indian Community has not identified any sacred Indian sites on the subject federal lands. Access by Indian religious practitioners would not be limited, nor would the Union Building Interpretive Facility adversely affect the physical integrity of such sacred sites if they existed (Executive Order 13007).

L. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112)?

The park's landscape architect will guide landscape treatment in the project area and will ensure that no methods would contribute to the introduction, continued existence, or spread of non-native invasive species.

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the preferred alternative would not constitute an impairment to Keweenaw

National Historical Park's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the *Union Building Interpretive Facility Environmental Assessment*, the comments received, relevant scientific studies for similar areas, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies 2006.

PUBLIC INVOLVEMENT

External public scoping was conducted to inform various stakeholders and the public about the proposal to rehabilitate the Union Building and locate interpretive exhibits and orientation facilities in it. Dr. Marcella Wells, PhD, conducted Public Involvement Focus Groups October 24-26, 2008 to explore the intent of the Union Building project. (See *Front-End Evaluation Report for the Union Building Interpretive Facility, Keweenaw National Historical Park* – December 30, 2008.) Observations included residents' sense of place and first-time visitor perceptions, richness and complexity of the stories, misperceptions of the name, "Union Building," Italian Hall, paternalism, modern relevancy of the proposed topics, and potential alternatives. Forty-seven (47) people participated in six (6) focus groups.

External scoping continued at a public meeting on October 28, 2008. The results of the Public Involvement Focus Groups and the Value Analysis sessions were presented. Stakeholders were provided with an opportunity to discuss with and provide comments directly to the primary exhibit design team.

A press release was distributed to media outlets across the western Upper Peninsula, resulting in numerous public service announcements on radio stations, a news spot on WNMU Public Radio, and an article in the Daily Mining Gazette. Flyers were posted in public gathering spaces in the local area.

A third public meeting was held on July 8, 2009 to discuss the Design Development I phase of exhibit planning. The meeting was attended by eight (8) residents of Calumet, Laurium, and Hancock in addition to NPS staff and the Office of Krister Olmon, Inc. (Report to follow.) Attendees had the opportunity to view and discuss a three-dimensional model of the proposed exhibit and accompanying documentation.

The Union Building Interpretive Facility Environmental Assessment was released for a 30-day review by park and regional office staff. After comments were incorporated as appropriate, it was then released for a 30-day public review and comment period, ending March 5, 2010.

To inform the public of the availability of the EA, the NPS published and distributed press releases to various agencies and media outlets on the park's mailing list. Copies of the EA were provided to interested individuals upon request. Copies of the document were available for review at the CLK Public Library in Calumet, MTU Van Pelt Library and Portage Lake District Library in Houghton, and the Hancock School Public Library in Hancock, Michigan. Other copies were available at the Calumet Village Office, the offices of the Charter Township of Calumet, Osceola Township, Franklin Township, and Quincy Township. The EA was also available for download at the NPS website: www.nps.gov/kewe.

The EA was subject to a 30-day public review and comment period. During this time, the public was encouraged to submit their written comments to the NPS at the park headquarters address. Another option for public comment was to access the NPS website for Planning, Environment and Public Comment (PEPC) at: parkplanning.nps.gov to provide comments on the Union

Building EA. Following the close of the comment period, the one public comment was reviewed and analyzed prior to the release of the decision document. In response to internal NPS and public review, the NPS made appropriate changes to the EA as needed.

CONCLUSION

The preferred alternative would not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). The preferred alternative would not have a significant effect on the human environment. Adverse environmental effects that could occur are negligible to minor in intensity. There would be no significant adverse effects on public health, safety, T&E species, sites or districts listed or eligible for listing in the National Register of Historic Places, or other unique characteristics of the area. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative adverse effects, or elements of precedence were identified. Implementation of the action would not violate any federal, state, or local environmental protection law. Based on the foregoing, it has been determined that the implementation of the Union Building Interpretive Facility entails no significant impact, and will not require the preparation of an Environmental Impact Statement.

RECOMMENDED



James P. Corless
Superintendent
Keweenaw National Historical Park

4/23/2010

Date

APPROVED



Ernest Quintana
Regional Director
Midwest Region

4-28-2010

Date