



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, DETROIT DISTRICT
477 MICHIGAN AVENUE
DETROIT MI 48226-2550

20 JANUARY 2021

SUBJECT: The Placement of Integrated Project Office on the Soo Locks Historic Property

TO: ALL INTERESTED AGENCIES, PUBLIC GROUPS, AND CITIZENS

On December 13, 2020 the U.S. Army Corps of Engineers (USACE), Detroit District released a public notice pursuant to Section 106 of 54 U.S.C. Subtitle III, National Historic Preservation Act (NHPA), which invited concerns and comments regarding a proposed Memorandum of Agreement (MOA) with the Michigan State Historic Preservation Office (SHPO) to erect a structure to provide office space necessary to execute and oversee construction of a new lock at the Soo Locks Complex, Sault Ste. Marie, Michigan. The public notice was released with a copy of a draft MOA and Alternative Analysis Document, which can be provided upon request or viewed online at <http://www.lre.usace.army.mil/> by clicking on the link to "Other Public Notice" in the bottom left corner.

Upon review of comments and concerns received in response to USACE public notice and press release, the USACE would like to address common concerns expressed by interested agencies, public groups, and citizens. Approximately 106 comments and concerns were received via email address provided by the above-mentioned public notice and the proposed project's news release posted December 23, 2020 on the USACE, Detroit District's public Facebook page.

What will the temporary office spaces look like?

USACE is working to develop an artistic rendering which will show the general appearance of this new structure.

Will the park still be open to the public during construction and the duration of use for the temporary office space?

Yes, this project will not impact public access to Canal Park. The placement of the structure will happen over the course of approximately two days during normal closing hours for the park. The connection to utilities and additional site work will be limited to this area of the park. The main entrance will remain open.

What will be removed for construction of the office spaces?

Two trees will be removed for this project. One of the trees has been condemned as a result of disease.

How will the site of the temporary offices be restored and when will restoration begin?

The USACE and Michigan State Historic Preservation Office (SHPO) have agreed that restoration efforts will include, but not be limited to, replacement of any removed trees of similar type, restoration of any grass area, and restoration of any previously existing sidewalks to previous conditions. The USACE has agreed that upon the new lock being substantially completed (90% constructed) they will submit a timeline for the removal of the structure within one year of substantial completion and subsequent restoration of the site to the SHPO and National Park Service (NPS). These efforts have been agreed to by USACE, the SHPO, and the NPS and are documented as a stipulation in a Memorandum of Agreement (MOA) being developed with SHPO and NPS under Section 106 of the National Historic Preservation Act (NHPA).

What is the risk of uncovering Native American burial and funerary remains during construction of the temporary office space?

The area that will be the footprint of the structure is an area that has been surveyed and disturbed in association with a previous project, thus the finding of culturally significant material (including intact burial and funerary object) is unlikely. Other locations of the Soo Locks property have a greater risk for uncovering intact cultural material as they have not been surveyed or are not known to be previously disturbed. In compliance with Section 106 of the NHPA, the USACE has coordinated with Tribes with historic and cultural interest in the area for comments and concerns and have agreed to have a USACE archeologist present during any ground disturbing work associated with this project.

Should any cultural material be discovered during construction, all work will cease and the USACE will contact the SHPO, National Park Service, and federally recognized tribes with a historic and cultural interest in the area and consult with them under Section 106 of the National Historic Preservation Act.

Why was this area of Canal Park chosen as the site for the temporary office spaces?

The other locations on the Soo Locks property that were considered for placement of the structures were near the Comfort Station, near the Maintenance and Support Building, and near the Visitor Center. Each were considered as follows with the chosen location offering the benefit of proximity to the project site while minimizing the impact to Canal Park.

West End of Canal Park

This area of Canal Park was not considered as a viable option for installation of the temporary structures as it is already an area used for vital operations and maintenance activities done by USACE for the continued operation of the Soo Locks throughout the year. Access to city utilities needed for the office space is difficult in this area and would require effort and costs that are prohibitive for this option.

Near the Comfort Station

Though the closest to the project site, the placement of the temporary structure near the Comfort Station would be in the most prominent viewshed of the Soo Locks from the Canal Park main entrance and would occupy the same space as a paved overlook area that is frequently used by the public. Other locations reviewed for placement of the structures on the Soo Locks property have been determined to have less impact on visitor access to the park.

Near the Maintenance and Service Building

The placement of the temporary structure near the Maintenance and Service Building would have the least obstruction to the visitor's viewshed of the Locks, but it would place the office space the furthest away from the project site and would require the removal of six mature, healthy trees and the relocation of park fencing. This location presented drainage concerns that would have brought about additional time and cost to the project.

Near the Visitor Center

Though this location would offer adequate proximity of the office space to the project site, placement of the temporary structures near the Soo Locks Visitor Center would ultimately impede foot traffic between the Visitor Center and Viewing Stand of the Locks themselves, both vital parts of tourism for the Soo Locks. This location would also impact the park itself as park fencing would need to be moved and three mature, healthy trees would need to be removed.

What are the advantages of locating the temporary office near the main park entrance?

The location near the main entrance of Canal Park from Portage Avenue minimizes removal of healthy trees. Furthermore, while the location near the main entrance appears centrally located in the park from an aerial view, the location will minimize impacts to visitor's view of the locks as they enter the park. From the main entrance the guard shelter will obscure the view of the structure and visitors will be focused toward the locks making the structure behind their line of site. The area where the structure will be placed has very low use by Visitors. Close proximity to the project site is crucial to the successful oversight of the construction project and this location provides efficient access to the construction site.

Where will employees using the offices park their vehicles while overseeing the new lock construction?

The USACE understands the significance of readily available parking space as part of tourism and access to Canal Park. USACE Employees will be parking in all available government-owned parking space first, and only utilizing public parking as needed.

Could the temporary office spaces be installed at the Depot Lot, which is owned by the USACE?

This location is too far from the project site to ensure adequate oversight of the new lock construction. This location is also the proposed site of a new backup generator building

and additional parking for the new lock management team. In addition, during the construction of the new lock, other construction projects to maintain the existing facility will continue to take place with the Depot Lot continuing to be a key location for contractor office trailers and equipment staging.

Why is the time associated with securing lease for a local office space or empty lot in Sault Ste. Marie considered prohibitive for this proposal?

Leasing a space large enough for the entire team (roughly 9,000 square-feet) would require the USACE to use the General Service Administration (GSA) leasing process. The GSA has estimated that it would take several years to secure a lease once an adequate space in terms of space and proximity to the project area is found.

New lock personnel are currently using space in the Soo Lock Visitor Center which threatens to impede public access of the center upon its reopening on May 9, 2021. To alleviate this potential impact to tourist resources, a transitional, local office space is being leased beginning in April 2021 to accommodate the Construction Management Team while the temporary structure is being designed and installed. This space will provide roughly 2,500 square-feet and is not subject to a long leasing process, acting as an adequate short-term solution to restore full public access to the Visitor Center without stalling progress to the construction of the new lock. Though this leased space does not offer sufficient space and length of lease to be the exclusive office for the Construction Management Team, the USACE is considering continued use of this as supplemental office space to accommodate the massive effort needed at the beginning stages of new lock construction.

How does the construction cost of the installation of temporary office space and associated staging and restoration of the site in Canal Park compare to the costs associated with using space in the Soo Locks Administration Building?

The cost of a temporary structure is one third the cost of using space in the Administration Building. To create a usable space in the Soo Locks Administration Building would require extensive modification of the third floor of the building. These modification efforts would include, but not be limited to, the construction of a fire escape, installation of an elevator for handicap access, installation of fire alarm and sprinkler system, installation of additional bathrooms, installation of HVAC system, and the installation of city sewer access to accommodate additional personnel as the existing septic system is undersized. These modifications would take several years to design and construct and is projected to cost well over \$6M. Additionally, all modifications would need to be designed to minimize any effects to the building and follow the Secretary of the Interior's Standards for Rehabilitation whenever possible, as the Administration Building is itself a contributing resource to the historic nature of the Soo Locks.

Alternatively, the temporary office space is expected to cost roughly \$2M and can be constructed by the end of 2021.

Could the temporary offices be installed outside of Sault Ste. Marie?

This office space will be the base of operations for the oversight of this project and in order to ensure the highest quality and timely execution the construction management team will need to be in daily and hourly interaction with the contractor and operations team at the Lock. The team needs to be within short walking distance of the project.