



May 28th, 2021

Jessica McDonald | Environmental Specialist
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Re: Section 106 Process for the proposed telecommunications undertaking in the Copper Harbor area, at the east end of Eagle Harbor Township, more specifically – NE ¼ of NE ¼ Sec 01, T58N R29W.

To whom it may concern:

With respect to Brockway Mountain Drive, listed on the National Register of Historic Places, and the placement of the 260' tower with associated antenna, I feel that its location and height will be a dominate landmark on the landscape as viewed from this historical resource. Built in the early 1930's, this drive was purposefully created by the CCC to create a uniquely scenic route for travelers to experience, while minimizing the impacts to the topography and environment and encourage tourism in the region. While initial photo simulations downplayed the imposition of this tower, the recent drone and balloon test that was performed has revealed that this tower will extend far above the tree height, and create an adverse effect on the views from this historical drive.

Cellular coverage is important in rural areas like ours, especially in an area like Copper Harbor that does not have *any* signal coverage. But, providing a cellular signal to the largest area would seem to be the most logical undertaking. Likewise the goal of the FirstNet Authority is to provide the largest geographical coverage, and representatives have noted that once this tower is built, other smaller towers will need to be constructed to fill the holes in the limited coverage that this location would provide. Getting this tower site in an appropriate location and limiting its visual impact is understandably a difficult task.

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From Ramakers January 22, 2021 letter to Martha MacFarlane-Faes, State Historic Preservation Office, Michigan Historical Center, the subject being the “Updated Justification Information,” the correspondence offered several alternative sites for tower construction. The following would be my recommendations for mitigation that would address our historic preservation concerns:

- I would again suggest the previously approved tower location on the north side of Brockway Mountain (47.466514,-87.911686) that seemed to offer better coverage, at a height that wouldn't require the tower to be lit, and would be away from the natural views along the drive.
- Another location - The Keweenaw Mountain Lodge property- is higher in elevation than the proposed location, would seem to offer more coverage to the north and east toward the beginning of US41, already has power to the parcel, and would move the visibility of the tower from the Mountain Drive further to the east.
- Another option that hasn't been discussed in length is co-locating an additional antenna on an existing tower (south of Lake Medora) *and* using a shorter tower at the proposed location that would be less imposing on this historical feature.
- Other mitigation efforts that could benefit the Brockway Mountain Drive could be the establishment of a Brockway Mountain Stewardship Fund to begin the process of accumulating funds for improvements along the Drive, summit, and future resurfacing of this historic resource – although this action would not address concerns regarding the visual effects of this tower.

Thank you for the opportunity to address our historic preservation concerns.

Kind Regards,

A handwritten signature in blue ink that reads "Rich Probst, Jr." The signature is written in a cursive, flowing style.

Rich Probst, Jr.
Supervisor
Eagle Harbor Township
Keweenaw County